

POLICIES &

PROCEDURES

2018-2019



* All policies are reviewed annually



Functional
skills UK

Pavilion
TRAINING



European Union
European Social Fund
Investing in jobs and skills

Contents:	Page
Health and Safety Policy	3-5
Safeguarding Policy	6-14
Data Protection Policy	15
Appeals and Complaints Policy	16-18
E-Safety Policy	19-22
Acceptable Usage for Learners Policy	23-24

Health and Safety Policy/Statement

Our statement of general policy is to:

- Provide adequate control of the health and safety risks arising from activities.
- consult with our employees on matters affecting their health
- provide and maintain safe plant and equipment
- ensure safe handling and use of substances
- provide information, instruction and supervision for employees
- ensure all employees are competent to do their tasks, and to give adequate training
- prevent accidents and cases of work-related ill health
- maintain safe and healthy working conditions
- review and revise this policy as necessary at regular intervals

Responsibilities

1. Overall and final responsibility for health and safety is that of the managing director Paul Smith
2. Day-to-day responsibility for ensuring this policy is put into practice is delegated to the centre manager
3. To ensure health and safety standards are maintained/improved, the centre manager is responsible in the following areas:
 - Health and Safety visits
 - Risk assessments
 - Updating operating procedures

All employees must:

- Co-operate with supervisors and managers of health and safety matters
- Not interfere with anything provided to safeguard their health and safety
- Take reasonable care of their own health and safety
- Report all health and safety in concerns to an appropriate person (centre manager)

The centre manager is responsible for:

1. Safe plant and equipment
 - Identifying all equipment requiring maintenance
 - Ensuring effective maintenance procedures are drawn up
 - Checking the new/repaired equipment meets health and safety standards
2. Arrangements under the Control of Substances Hazardous to Health Regulations 2002 (as amended)
 - Identifying all substances which need a COSHH assessment
 - Undertaking COSHH assessments
 - Ensuring that all actions identified in the assessments are implemented
 - Ensuring that all relevant employees are informed about the COSHH assessments
 - Checking that new substances can be used safely before they are purchased

Information, instruction and supervision

- The Health and Safety Law poster is displayed in the Brighton Swimming Centre Office, Eastern Road, Brighton, BN2 5JJ and also on the top floor of Sussex Functional Skills Centre.
- Health and safety advice is available from www.hse.gov.uk
- Supervision of young workers/trainees will be arranged, undertaken and monitored by the appropriate people.
- The centre manager will give employees working at locations under the control of other employers, relevant health and safety information

Competency for tasks and training

All employees will be given health and safety induction training when they start work, which will cover basics such as first aid and fire safety.

There will also be job-specific health and safety training. BSC will also provide training if risks change and refresher training when skills are not frequently used such as lifeguard training which is offered at 3.5 hours every month.

Arrangements for training, including arrangements for record keeping are as follows:

- Induction training will be provided for all employees by Jade Cohen at Brighton Swimming Centre and Charlie Dew/Luke Hardy at Skills House.
- Job Specific training (lifeguard training) will be provided by Jade Cohen or other RLSS approved trainer/ Assessor
- Training records are kept at by Jade Cohen, Eastern Road, Brighton, BN2 5JJ (lifeguard training and general staff training)
- Training will be identified, arranged and monitored by Jade Cohen

Accidents, first aid and work-related ill health

Our first aid arrangements are as follows:

- There is a first aid box located on poolside and in the staff office at BSC. There are also first aid boxes on the 1st floor and top floor of Sussex Functional Skills Centre.
- Office staff mentioned on the 1st aider sheet on the back of all doors or the lifeguard is the first aider.
- All accidents of work-related ill health are to be recorded in the accident book at whichever site is relevant.

The centre manager is responsible for reporting accidents, diseases and dangerous occurrences to the enforcing authority (HSE or your local authority depending upon where you work).

Monitoring

To check our working conditions, and ensure our safe working practices are being followed, the centre manager is responsible for:

- Investigating accidents
- Investigating work-related causes of sickness and absences
- Acting on investigation findings to prevent a reoccurrence

To check the working conditions of our learners on our funded programs and to ensure safe working practices are followed, we will

- Conduct health and safety (HASPS) visits every 2 years by NEBOSH or IOSH qualified inspectors
- Obtain copies of the operating procedures for each centre
- Ensure learners are aware of the Safety procedures in their workplace.

Emergency procedures – fire and evacuation

- The centre manager is responsible for ensuring the fire risk assessment is undertaken and implemented
- Escape routes are checked by the supervisors before every session
- Fire extinguishers are visually checked by the appropriate people and annually inspected by Pyrotec Ltd.
- Alarms are tested twice annually by specialist company – A1 Fire.
- Emergency evacuation will be tested every 6 months

This policy and procedure will be reviewed periodically to ensure that it remains fit for the purpose, suitable and complies with legislation.

This policy applies to staff employed by Functional Skills UK Ltd t/a Swim UK, Gym UK and Pavilion training, Brighton Swimming Centre Ltd and Brighton Swimming Centre Ltd t/a Brighton Swimming School, Pool to Pier and any other brands adopted by either company



Signed:

Name and position: Paul Smith MD
Date: December 2017
Review Date: December 2018

SAFEGUARDING

Vulnerable Adults and Child Protection Policy

Contents

A General Policy Statement

B Designated Staff with Responsibility for Child Protection

C Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

D Reporting and Dealing with Allegations of Abuse against Members of Staff

E Recruitment and Selection Procedures

A Policy Statement

Swim UK has a responsibility towards safeguarding and promoting the welfare of young people receiving education and training with us

Throughout these policies and procedures, reference is made to “young people”. This term is used to mean “those under the age of 18”. However, Swim UK also recognizes that some adults with learning difficulties and any adults who are vulnerable in any manner whatsoever, are to be protected within this policy. The term “young people” refers to all the above within this policy.

The procedures will be applied to allegations of abuse and the protection of vulnerable adults.

We must wherever possible strive to:

- Provide a safe environment for young people to learn in
- Identify young people who are suffering, or likely to suffer, significant harm, and
- Takes appropriate action to see that such young people are kept safe, both at home and whilst attending our courses.
- Report immediately to MET GB College/NSAFS/Skills Training UK Training Academy any concerns we have regarding any of their learners.

In pursuit of these aims, Swim UK will approve and review policies and procedures with the aim of:

- Raising awareness of issues relating to the welfare of young people and the promotion of a safe environment for young people learning with our organisation.
- Aiding the identification of young people at risk of significant harm, and providing procedures for reporting concerns
- Establishing procedures for reporting and dealing with allegations of abuse against members of staff
- The safe recruitment of staff
- Swim UK will refer concerns that a young person might be at risk of significant harm to social services and the police where relevant.

Swim UK recognise the following as definitions of abuse:

Physical Abuse

Physical abuse causes harm to a child's person. It may involve hitting, shaking, throwing, poisoning, burning, scalding, drowning or suffocating. It may be done deliberately or recklessly, or be the result of a deliberate failure to prevent injury occurring.

Neglect

Neglect is the persistent or severe failure to meet a young person's basic physical and/or psychological needs. It will result in serious impairment of the child's health or development.

Sexual Abuse

Sexual abuse involves a young person being forced or coerced into participating in or watching sexual activity. It is not necessary for the child to be aware that the activity is sexual and the apparent consent of the child is irrelevant.

Emotional Abuse

Emotional abuse occurs where there is persistent emotional ill treatment or rejection. It causes severe and adverse effects on the young person's behavior and emotional development, resulting in low self-worth. Some level of emotional abuse is present in all forms of abuse.

Bullying

Bullying can take many forms and may include threatening, inappropriate or abusive statements, made on social networks or via the internet in general.

B Designated Staff with Responsibility for Child Protection

MD and Managers of Swim UK with Lead Responsibility

Both have received training in child protection issues.

The designated senior member of staff is responsible for:

- Overseeing the referral of cases of suspected abuse or allegations
- Providing advice and support to other staff on issues relating to child protection
- Maintaining a proper record of any child protection referral, complaint or concern (even where that concern does not lead to a referral)
- Ensuring that parents of young people within Swim UK are aware of our child protection policy
- Liaising with appropriate agencies
- Liaising with employers, colleges and training organisations that we deal with.
- Ensuring that relevant staff receive basic training in child protection issues and are aware of Swim UK's child protection procedures.

C Dealing with Disclosure of Abuse and Procedure for Reporting Concerns

If a young person tells a member of staff about possible abuse:

- Listen carefully and stay calm.
- Do not interview the young person, but question normally and without pressure, to be sure that you understand what the child is telling you.
- Do not put words into the young person's mouth.
- Reassure the young person that by telling you, they have done the right thing.
- **Inform the young person that you must pass the information on, but that only those that need to know about it will be told. Inform them of to whom you will report the matter.**
- Make a detailed note of the date, time, place, what the young person said, did and your questions by completing the incident report form.

Staff should not investigate concerns or allegations themselves but should report them immediately to the Designated Person.

If the learner is a learner of one of our funding providers –Northbrook College or Catch 22 we should inform them immediately via their safeguarding officer and follow their procedures.

Northbrook College has the following document for reference “safeguarding young people and vulnerable adults at Northbrook College”.

D Reporting and Dealing with Allegations of Abuse against Members of Staff

The procedures apply to all staff, whether teaching, administrative, management or support, as well as to volunteers.

1 Introduction

1.1 In rare instances, staff of education institutions has been found responsible for child abuse. Because of their frequent contact with young people, staff may have allegations of child abuse made against them. Swim UK recognises that an allegation of child abuse made against a member of staff may be made for a variety of reasons and that the facts of the allegation may or may not be true. It is imperative that those dealing with an allegation maintain an open mind and that investigations are thorough and not subject to delay.

1.2 Swim UK recognises that the Children Act 1989 states that the welfare of the child is the paramount concern. It is also recognized that hasty or ill-informed decisions about a member of staff can irreparably damage an individual's reputation, confidence and career. Therefore, those dealing with such allegations within Swim UK will do so with sensitivity and will act in a careful, measured way.

2 Receiving an Allegation from a Child

2.1 A member of staff who receives an allegation about another member of staff from a young person should follow the guidelines in Part C for dealing with disclosure

2.2 The allegation should be reported immediately to the Managing Director, unless the MD is the person against whom the allegation is made, in which case the report should be made to the Manager of Swim UK. Allegations against staff must be referred to LADO.

2.2.1 Obtain written details of the allegation from the person who received it, that are signed and dated. The written details should be countersigned and dated by the MD (or designated person).

2.2.2 Record information about times, dates, locations and names of potential witnesses.

3 Initial Assessment by The MD (or designated person)

3.1 The MD (or designated person) should make an initial assessment of the allegation. **Where the allegation is either a potential criminal act or indicates that the child has suffered, is suffering or is likely to suffer significant harm, the matter should be reported immediately to the appropriate authority.**

3.2 It is important that the MD (or designated person) does not investigate the allegation. The initial assessment should be based on the information received and is a decision whether or not the allegation warrants further investigation.

3.3 Other potential outcomes are:

3.3.1 The allegation represents inappropriate behavior or poor practice by the member of staff and is neither potentially a crime nor a cause of significant harm to the young person. The matter should be addressed in accordance with Swim UK disciplinary procedures.

3.3.2 The allegation can be shown to be false because the facts alleged could not possibly be true.

4 Enquiries and Investigations

4.1 Child protection enquiries by social services or the police are not to be confused with internal, disciplinary enquiries by Swim UK. Swim UK may be able to use the outcome of external agency enquiries as part of its own procedures. The child protection agencies, including the police, have no power to direct Swim UK to act in a particular way; however, Swim UK should assist the agencies with their enquiries.

4.2 Swim UK shall hold in abeyance its own internal enquiries while the formal police or social services investigations proceed; to do otherwise may prejudice the investigation. Any internal enquiries shall conform to the existing staff disciplinary procedures.

4.3 If there is an investigation by an external agency, for example the police, the MD or designated person should normally be involved in, and contribute to, the inter-agency strategy discussions. The MD (or designated person) is responsible for ensuring that Swim UK gives every assistance with the agency's enquiries. He/she will ensure that appropriate confidentiality is maintained in connection with the enquiries, in the interests of the member of staff about whom the allegation is made.

4.4 Subject to objections from the police or other investigating agency, the MD (or designated person) shall:

4.4.1 Inform the young person or parent/carer making the allegation that the investigation is taking place and what the likely process will involve.

4.4.2 Ensure that the parents/carers of the young person making the allegation have been informed that the allegation has been made and what the likely process will involve.

4.4.3 Inform the member of staff against whom the allegation was made of the fact that the investigation is taking place and what the likely process will involve.

4.5 The MD (or designated person) shall keep a written record of the action taken in connection with the allegation.

5 Suspension of Staff

5.1 Suspension should not be automatic. In respect of staff other than the principal, suspension can only be carried out by the MD.

5.2 Suspension may be considered at any stage of the investigation. It is a neutral, not a disciplinary, act and shall be on full pay. Consideration should be given to alternatives: e.g. paid leave of absence; agreement to refrain from attending work; change of, or withdrawal from, specified duties.

5.3 Suspension should only occur for a good reason. For example:

5.3.1 Where a young person is at risk.

5.3.2 Where the allegations are potentially sufficiently serious to justify dismissal on the grounds of gross misconduct.

5.3.3 Where necessary for the good and efficient conduct of the investigation.

5.4 If suspension is being considered, the member of staff should be encouraged to seek advice, for example from a trade union.

5.5 Prior to making the decision to suspend, the MD should interview the member of staff.

5.6 During the interview, the member of staff should be given as much information as possible, the reasons for any proposed suspension, provided that doing so would not interfere with the investigation into the allegation. The interview is not intended to establish the member of staff's innocence or guilt, but given the opportunity for the member of staff to make representations about possible suspension. The member of staff should be given the opportunity to consider any information given to him/her at the meeting and prepare a response, although that adjournment may be brief.

5.8 If the MD considers that suspension is necessary, the member of staff shall be informed that he/she is suspended from duty. Written confirmation of the suspension, with reasons, shall be dispatched as soon as possible and ideally within one working day.

5.9 Where a member of staff is suspended, the MD should address the following issues:

5.9.4 The parents/carers of the young person making the allegation should be informed of the suspension. They should be asked to treat the information as confidential. Consideration should be given to informing the child making the allegation of the suspension

5.12 The suspension should remain under review in accordance with Swim UK disciplinary procedures.

6 The Disciplinary Investigation

6.1 The disciplinary investigation should be conducted in accordance with the existing staff disciplinary procedures.

6.2 The member of staff should be informed of:

6.2.1 The disciplinary charge against him/her.

6.2.2 his/her entitlement to be accompanied or represented by a trade union representative or friend.

6.3 Where the member of staff has been suspended and no disciplinary action is to be taken, the suspension should be lifted immediately, and arrangements made for the member of staff to return to work. It may be appropriate to offer counseling.

6.4 The young people making the allegation and/or their parents should be informed of the outcome of the investigation and proceedings. This should occur prior to the return to Swim UK of the member of staff (if suspended).

7 Allegations without foundation: the following processes should be considered.

7.2.1 Inform the member of staff against whom the allegation is made orally and in writing that no further disciplinary or child protection action will be taken. Consideration should be given to offering counseling/support.

7.2.2 Inform the parents/carers of the alleged victim that the allegation has been made and of the outcome.

7.2.3 Where the allegation was made by a young person other than the alleged victim, consideration to be given to informing the parents/carers of that child.

7.2.4 Prepare a report outlining the allegation and giving reasons for the conclusion that it had no foundation and confirming that the above action had been taken.

8 Records

8.1 It is important that documents relating to an investigation are retained in a secure place, together with a written record of the outcome and, if disciplinary action is taken, details retained on the member of staff's personal and confidential file. The Safe within Sussex Functional Skills Centre would be suitable if this situation occurred.

E Recruitment and Selection Procedures (DBS Procedures)

Swim UK should assess the risk to learners when a new member of staff (who has direct and 1 to 1 contact with the learners) commences employment.

Such employees must either:

- (a) produce a CRB/DBS clearance document from an existing employer (which is less than 12 months old)
- (b) Or submit to our own CRB/DBS system operated in conjunction with Swim UK.

Employees in (a) must complete a CRB/DBS check within 12 months of starting with Swim UK.

All staff will be asked to undertake new DBS clearance every 3 years, unless concerns are raised whereupon we will apply for a renewal ASAP. Swim UK keep a centralized record of our staff and tutor's latest checks, we also have paper copies in a centralized file which is locked securely in the Portslade office.

The following processes must also be followed:

- The post or role is to be clearly defined.
- The key selection criteria for the post or role can be identified.
- Vacancies are to be advertised widely to ensure a diversity of applicants.
- Requirement of documentary evidence of academic & vocational qualifications.
- Obtaining of professional and character references.
- Verification of previous employment history.

Learners enrolled on behalf of Prime Further Education Providers.

Learners enrolled via a funded learning programme on behalf of our Prime Learning Providers detailed below have the right to take any issue up directly with them directly.

MET Northbrook 17 Liverpool Gardens, Worthing BN11 1RY Tel 01903 273735

Catch 22, Ground Floor Birch House Parklands Business Park Forest Road
Waterlooville, Hampshire PO7 6XP Telephone: 02392 222770

National Skills Academy for Financial Services

T: 0845 6182353 W: www.nsafs.co.uk 18 King William Street, London, EC4N 7BP

Skills Training UK

12th Floor, York House, Empire Way, Wembley, HA9 0PA. Tel: 0208 7958222

Signed:



Name & Position: Paul Smith MD

Date: December 2017

Review Date: December 2018

Data Protection Policy/Statement

Swim UK is fully committed to protecting the rights and privacy of individuals, in accordance with the Data Protection Act 1998. Information about our personnel, candidates and other individuals will only be processed in line with established regulations. Personal data will be collected, recorded and used fairly, stored safely and securely and not disclosed to any third party unlawfully. As the lawful and correct treatment of personal information is critical to our successful operations and to maintaining confidence. Swim UK is committed to:

- Protecting staff and candidates personal details, records and assessment outcomes.
- keeping staff and candidates' and other individuals' personal data up to date and confidential.
- maintaining personal data only for the time period required.
- Releasing personal data (in any form and by any means) only to authorised individuals/parties.
- collecting accurate and relevant data only for specified lawful purposes.
- adhering to regulations and related procedures to ensure that all employees who have access to any personal data held by or on behalf of Swim UK are fully aware of and abide by their duties under the Data Protection Act 1998.

Candidates are required to report any allegation in relation to the unlawful treatment of personal data via the Swim UK candidate complaint procedure. A complaint should be made in the event that candidates feel that records of their personal data have been:

- lost
- obtained through unlawful disclosure or unauthorised access
- recorded inaccurately and/or in a misleading manner
- Provided to a third party without permission.

Where required, Swim UK will take appropriate action/corrective measures against unauthorised/unlawful processing, loss, destruction or damage to personal data.

It is ultimately the responsibility of the Centre Manager, to ensure that this policy is published and accessible to all personnel, candidates and any relevant third parties.

This policy applies to staff employed by Functional Skills UK Ltd t/a Swim UK, Gym UK and Pavilion training, Brighton Swimming Centre Ltd and Brighton Swimming Centre Ltd t/a Brighton Swimming School, Pool to Pier and any other brands adopted by either company

Signed: 

Name & Position: Paul Smith MD

Date: December 2017 (Policy to be reviewed during 2018 in line with new Data Protection laws)

Review Date: December 2018

Swim UK Appeals and Complaints Policy

Appeals and Complaints Policy and Procedure

Policy Statement

Candidates have the right to complain against their Tutor/Assessor and/or appeal against an assessment¹ decision if they feel that the decision is unfair.

Complaints

If a candidate wishes to make a complaint about a course, a tutor or a facility then in the first instance Swim UK Centre Managers should be made aware in writing:

Charlie Dew and Luke Hardy

Swim UK, Skills House, 2 Gordon Mews, Gordon Close, Portslade, BN41 1 HU – 01273 434400

charlie@swimuk.org

luke@swimuk.org

Swim UK management will aim to be in contact within 5 working days with either a resolution to the complaint or a plan of action. This will be fully dependent on the nature of the complaint. If and where necessary Swim UK will inform Awarding Bodies of complaints.

Paul Smith is ultimately responsible for ensuring this policy is carried out, that it is fit for the purpose, relevant and complies with legislation.

1 Appeals procedure

If the Candidate feels that they have a justified reason to appeal against the assessment made by their Course Tutor /Assessor or the Internal Verifier then the following procedures should be followed:

- 1.1 A Candidate's first line of appeal is to their Tutor/Assessor. It should be made in writing and clearly explain the nature of the appeal. A copy should also be sent to the Centre Managers.
- 1.2 The Tutor/Assessor is required to respond to the appeal in writing within 10 working days and a copy be sent out the Centre Coordinator and the Internal Verifier.
- 1.3 The Course Tutor/Assessor may either confirm the original assessment or revise it.
- 1.4 The Candidate can either accept this assessment or proceed with the second line of appeal.

¹In the case of ASA Assessment this procedure only applies to the practical teaching/coaching and candidate packs

1.5 The Candidate's second line of appeal is to their Internal Verifier. This again should be made in writing including all relevant details and any supporting evidence. A copy should also be sent to the Centre Managers.

1.6 A panel made up of the Internal Verifier and two Assessors will meet to judge the evidence.

1.7 Within 7 days of the appeal being received the Candidate will be informed in writing of the decision reached.

1.8 The panel will either confirm the original assessment or support the appeal and reach an agreement with the Assessor and Candidate based on the evidence provided. In the unlikely event of a disagreement between the Course Tutor and the Internal Verifier with regard to the assessment the decision of the Internal Verifier will prevail.

1.9 In the event that the Internal Verifier/Panel is unable to make a decision or the candidate still feels that the decision is unfair then the next line of the appeal is to the External Verifier. For the Internal Verifier this must be done in the form of a report for the Candidate this must be done in writing.

1.10 The External verifier may confirm the original assessment, support the appeal on the evidence provided or obtain further advice from the Chief Verifier or such higher bodies as are relevant.

1.11 If a satisfactory conclusion for the Candidate is not reached by this stage then they may:

1.12 Appeal directly the relevant awarding body, a fee for handling such appeals will be chargeable to the Candidate. This will only be refunded if the appeal is upheld.

1.13 Be required to be reassessed in a specific assessment area or against the total assessment criteria. In this situation a fee equal to that charged by the awarding body will be made to the Candidate.

During the RLSS NPLQ courses candidates are assessed by external assessors, not their course tutor. Therefore, for Pool Lifeguard qualifications in the first instance a complaint needs to be submitted to the Approved Training Centre co-ordinator. For lifesaving qualifications an appeal needs to be made to RLSS UK Branch Lifesaving Co-ordinator. For further information see Page 9 of the RLSS code of practise (copy kept in Swim UK office).

For Active IQ. If an individual wishes to appeal against a decision taken by a centre it must first of all go through the centre's appeals process before bringing the matter to Active IQ. (Full copy of Active IQ appeals policy kept in Swim UK Office)

For ASA. If an individual wishes to appeal against a decision taken by a centre it must first of all go through the centre's appeals process before bringing the matter to the ASA. (Full copy of ASA appeals policy kept in Swim UK Office)

During our Highfield courses we will follow our own appeals procedure in regards to an assessment, if no decision can be reached or in exceptional circumstances learners will apply directly to HABC. Full copies of Highfield's appeals and complaints policy are on file in the Swim UK office.

1st4Sport will also need to be contacted directly if no satisfactory decision can be reached.

Learners enrolled on behalf of Prime Further Education Providers.

- learners enrolled via a funded learning programme on behalf of Prime learning Provider have the right to take any issue up directly with them directly.

These are currently:

Northbrook MET,
17 Liverpool Gardens, Worthing, West Sussex, BN11 1RY. Tel 01903 273735

Catch 22, Ground Floor, Birch House, Parklands Business Park, Forest Road, Denmead, Waterlooville PO7 6XP Tel: 02392 222770

National Skills Academy Financial Services
18 King William Street, London, EC4N 7BP: Tel: 0845 6182353

Skills Training UK
Head Office | 12th Floor | York House | Empire Way | Wembley | HA9 0PA
Tel: 0208 795 8222

This policy applies to staff employed by Functional Skills UK Ltd t/a Swim UK, Gym UK and Pavilion training, Brighton Swimming Centre Ltd and Brighton Swimming Centre Ltd t/a Brighton Swimming School, Pool to Pier and any other brands adopted by either company

Signed:



Name & Position:

Paul Smith MD

Date: December 2017

Review Date: December 2018

E-Safety Policy

Introduction

Swim UK recognises the benefits and opportunities which new technologies offer to teaching and learning. We provide internet access to all learners and staff and encourage the use of technologies in order to enhance skills, promote achievement and enable lifelong learning. However, the accessibility and global nature of the internet and different technologies available mean that we are also aware of potential risks and challenges associated with such use. Our approach is to implement appropriate Safeguarding within Swim UK while supporting staff and learners to identify and manage risks independently and with confidence. We believe this can be achieved through a combination of security measures, training, guidance and implementation of our policies. In furtherance of our duty to safeguard learners, we will do all that we can to make our learners and staff stay e-safe and to satisfy our wider duty of care. This e-safety policy should be read alongside other relevant policies e.g. safeguarding, acceptable use, anti Bullying, Disciplinary and Child Protection.

Creation, Monitoring and Review

Swim UK's e-safety officer is Charlie Dew, her name and contact details are displayed in all classrooms where learning takes place.

Policy Scope

The policy applies to all users/all learners and staff/all members of Swim UK who have access to the Swim UK IT systems. Both on the premises and remotely. Any users of Swim UK IT systems must adhere to e-Safety Rules and the Acceptable use Agreement.

The e-Safety Policy applies to all use of the internet and form of electronic communication such as email, mobile phones and social media sites.

Roles and responsibilities

All staff are responsible for ensuring the safety of learners and should report any concerns immediately to their line manager. When informed about an e-Safety incident, staff members must take particular care not to guarantee any measure of confidentiality towards either the individual reporting it, or to those involved.

All learners must know what to do if they have e-safety concerns and who to talk to. In most cases, this will be Charlie Dew – charlie@swimuk.org / 01273 434400.

Where any report of an e-safety incident is made, all parties should know what procedure is triggered and how this will be followed up. Where management considers it appropriate, the child protection officer may be asked to intervene with appropriate additional support from external agencies.

Staff

All staff are responsible for using Swim UK IT systems and mobile devices in accordance with Swim UK, Acceptable Use Policy and the e-Safety Rules. Staff are responsible for displaying a model example to learners at all times through embedded good practice.

All digital communication with learners must be professional at all times and be carried out in line with the Swim UK Code of Conduct, which you will find in the policies folder within the office. Online communication with learners is restricted and external platforms not hosted by Swim UK, such as social media sites should not be used for communication with learners.

Security

Swim UK will do all that it can to make sure the network is safe and secure. Every effort will be made to keep security software up to date. Appropriate security measures will include the use of enhanced filtering and protection of firewalls, servers, routers, work stations etc. To prevent accidental or malicious access of Swim UK Systems and information. Digital communications, including email and internet postings, over the Swim UK network, will be monitored in line with the e-security policy.

Behaviour

Swim UK will ensure that all users of technologies adhere to the standard of behaviour as set out in the Acceptable Use Policy or Staff/Learner Code of behaviour. Swim UK will not tolerate any abuse of IT systems, whether offline or online, communications by staff and learners should be courteous and respectful at all times. Any reported incident of bullying or harassment or other unacceptable conduct will be treated seriously and in line with the students and staff disciplinary code. Where conduct is found to be unacceptable, Swim UK will deal with the matter internally. Where conduct is considered illegal, Swim UK will report the matter to the police.

Communications

Swim UK requires all users of IT to adhere to tutor/assessor rules when email, mobile phones, social media sites, games consoles, chatrooms, video conferencing and web cameras may be used during the day.

Use of Images and Video

The use of images, or photographs, is popular in teaching and learning and should be encouraged where there is no breach of copyright or other rights of another person e.g. images rights or rights associated with personal data. This will include images downloaded from the internet and those belonging to staff or learners.

All learners and staff should receive training on the risks when taking, downloading and posting images online and making them available to others. There are particular risks where personal images of themselves or others are posted onto social networking sites for example.

Swim UK teaching staff will provide information to learners during reviews mainly, on the appropriate use of images as detailed in the policy. This includes photographs of learners and staff as well as using third party images. Our aim is to reinforce good practice as well as offer further information for all users on how to keep their personal information safe.

No image/photograph can be copied, downloaded, shared or distributed online without permission from Swim UK/Parent/Carer/Pupils. Photographs of activities on Swim UK premises should be considered carefully and have the consent from pupils and parents before being published. Approved photographs should not include names of individuals without consent.

Personal Information

Personal Information is information about a particular living person. Swim UK collects and stores the personal information of learning and staff regularly e.g. names date of birth, email. Addresses, assessed materials and so on mainly via our Take a Byte (TAB) CRM system. Swim UK will keep that information safe and secure and will not pass it onto anyone else without the express permission of the Pupil/Parent/Carer.

No personal information can be posted to Swim UK website without permission of Swim UK/Parent/Carer/Pupil unless it is in line with our Data Protection Policy. Only names and work email addresses of senior staff will appear on the Swim UK website, no staff or learner's personal information will be available on the website without consent.

Staff must keep learners personal information safe and secure at all times. When using an online platform, all personal information must be password protected. No personal information of individuals is permitted offsite unless the member of staff has the permission of their manager. Every user of IT facilities is required to log off on completion of any activity, or where they are physically absent from a device for any period.

Education and Training

With the current unlimited nature of internet access, it is impossible for the college to eliminate all risks for staff and learners. It is our view therefore, that Swim UK should support staff and learners stay e-safe through regular training and education.

Incidents and response

Where an e-safety incident is reported to Swim UK this matter will be dealt with very seriously. Swim UK will act immediately to prevent, as far as reasonably possible, any harm or further harm occurring. If a learner wishes to report an incident, they can do so via the e-Safety Officer. Where a member of staff wishes to report an incident, they must contact their line manager as soon as possible. Following an incident, Swim UK will review what has happened and decide on the most appropriate and proportionate course of action. Sanctions may be put in place, external agencies may be involved or the matter may be resolved internally depending on the seriousness of the incident. Serious incidents will be dealt with by senior management, in consultation with appropriate external agencies.

This policy applies to staff employed by Functional Skills UK Ltd t/a Swim UK, Gym UK and Pavilion training, Brighton Swimming Centre Ltd and Brighton Swimming Centre Ltd t/a Brighton Swimming School, Pool to Pier and any other brands adopted by either company.

Signed:



Name of employee:

Paul Smith MD

Date: December 2017

Review date: December 2018

Acceptable Usage Policy – Learners Using PC/Laptop

Learners – Please ensure you read and understand this policy.

Computer misuse

Some learners will have access to computers/laptops during the course of their learning. Abuse of the Company's computers is prohibited. Vandalism of the Company's computer network constitutes a potential gross misconduct offence and could result in the learner being removed from their learning programme or apprenticeship.

The internet

It is an inappropriate use of e-mail and the Internet for learners to access or download material that can be considered obscene, offensive, abusive, sexual, sexist, religion related, racist, or defamatory. Such material can also be contained in jokes sent by email. If users receive material with such content, the material should be promptly disposed of. Such misuse of the system will be treated extremely seriously. Logging on to sexually explicit websites or the downloading and/or circulation of pornography constitute gross misconduct offences. Any form of cyber bullying or virtual bullying whereby harmful or cruel text or images is sent or posted using the internet or other digital communication whether it is intentionally/unintentionally aimed at a learner or brings the Company into disrepute is also prohibited.

Swim UK actively monitors Internet use for content, and the amount it is used by individuals via random system checks and authorised investigations. All visited web sites are clearly logged as well as times of access. Excessive private use of the Internet may lead to disciplinary action. If any material is viewed in error that does not meet our acceptable use policy, a member of the IT Services department should be informed. Failure to do this may result in later disciplinary action.

Copyright applies to all text, pictures, video, and sound, including those achieved by email or the Internet. Music and video files such as MP3s and MPEG4s which are not free to distribute must not be downloaded or stored on any part of the Swim UK laptops or PC's.

Uploading material to the Internet for use other than course or work-related activities is prohibited.

Learners must never involve themselves in political discussions through outside newsgroups using the Swim UK network.

The Internet must be considered an unsecured medium when transmitting data. Any transactions that originate from Swim UK are carried out entirely at the user's risk. Swim UK is not responsible for any on-line fraud that may occur from personal use; or the loss, damage or misuse of data.

Chat rooms

Chat rooms including Yahoo messenger, AOL Instant Messenger, MSN, ICQ etc. are not permitted unless as part of the delivered curriculum.

Students accessing social networking sites outside of learning should not, in the interests of safeguarding, include current Swim UK staff as “friends”. Private messages should never be sent to any staff.

Passwords

Each user is responsible for safeguarding their system passwords. Individual passwords should never be printed, stored online or given to other people. Also, user password rights do not imply that user has complete privacy. Use good practice when selecting passwords, a combination of numbers and letters is recommended for security. Do not use obvious words or phrases; try to pick hard to guess random passwords.

Computer viruses

The Company’s computer network makes it vulnerable to viruses. Therefore, only duly authorised personnel have the authority to load program software onto the network system. Data compatible with the Company’s system may be loaded only after being checked for viruses by authorised personnel. Any learner found to be contravening this may face disciplinary action.

Signed:



Name of employee:	Paul Smith MD
Date:	December 2017
Review Date:	December 2018