



**Scottish  
Swimming**

**Wellbeing & Protection  
(Safeguarding) Policy**

**Children &  
Young People  
2025–2030**



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# 1.0 Introduction & Policy Statement

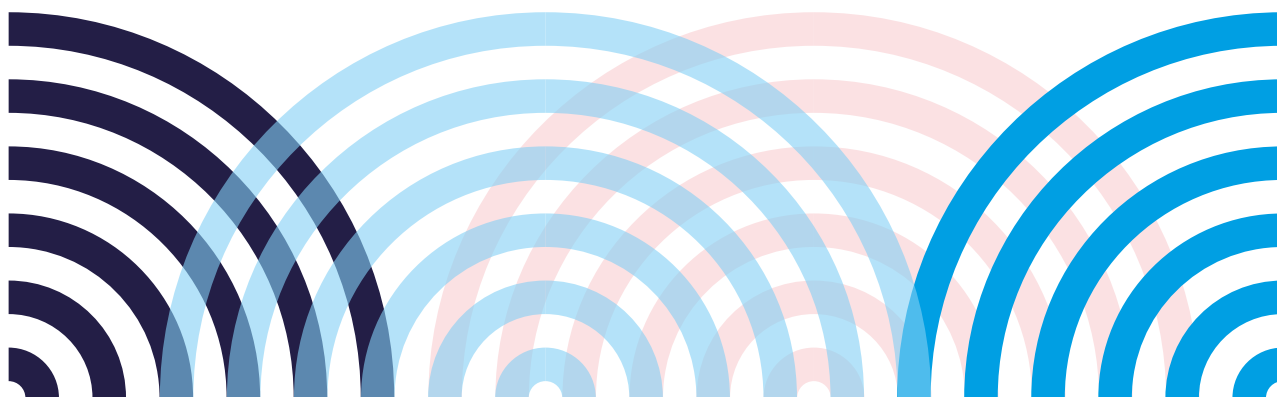
Scottish Swimming is committed to ensuring every child and young person who takes part in our aquatic sports whether that is Swimming, Diving, Artistic Swimming, Open Water or Water Polo, should be able to participate in an enjoyable and safe environment, which promotes inclusion and protects them from harm, poor practice, exploitation, bullying and abuse.

Scottish Swimming values a rights-based approach within our sports and this Scottish Swimming Safeguarding Policy takes into account the National guidance for Child Protection in Scotland 2023 and the principles of 'Getting It Right For Every Child (GIRFEC)'. Scottish Swimming also recognises the importance of the general principles of the UN Rights of the Child (UNCRC) and the UNCRC (Incorporation) Scotland Act 2024. Staff and volunteers will work together to embrace difference and diversity and respect the rights of children and young people.

Ensuring the voice of the child and voice of the athlete is another key driver for Scottish Swimming through this policy. It is essential that our young people have the opportunity to feedback their thoughts, opinions and experiences on their sport and are also involved in the decision-making processes of further developing our aquatic sports. Our clubs play an important part in facilitating these opportunities and ensuring that the voice of the young people is reflected strongly in everything that we do.

This safeguarding policy has been developed to assist Scottish Swimming and our club network to achieve our common goal of protecting and supporting our members across all aquatic sports. We aim to safeguard children and young people in line with current legislation, regulations and guidance and as it sits as a Code of Practice within the Scottish Swimming governance, the policy must be adopted by all Scottish Swimming affiliated clubs and teams.

The management for safeguarding is not the sole responsibility of any one person at club, district or national level so this policy provides comprehensive wellbeing and protection information in one place for everyone involved in aquatics. Supporting appendices and resources can be found on the Scottish Swimming **Wellbeing & Protection** webpage.



## 2.0 Key Definitions & Principles of Safeguarding

**Children & Young People** – Within the Children & Young People (Scotland) Act 2014, a child is defined as anyone who has not reached the age of 18. For the purposes of this policy, ‘children’ and ‘young person’ refer to members under the age of 18 and may be used interchangeably throughout the document.

**Club** – a club or composite team affiliated to Scottish Swimming.

**Member** – any individual participating in aquatics sports under the jurisdiction of Scottish Swimming who has a valid membership in place for the current year. This may be Athletes, Coaches, Teachers, Volunteers, Life Members, Technical Officials and parents/guardians of child members.

**Safeguarding** – The protection of a child or young person’s health, wellbeing and human rights, and enabling them to live free from harm, abuse and neglect. It is the umbrella term for welfare, wellbeing and protection.

**Scottish Swimming Safeguarding Team** – This is the Scottish Swimming Team who are involved with supporting clubs and members with case management, general safeguarding advice, safeguarding related forms, processes and policies. The team can be contacted for general enquiries and processes at [wellbeingprotection@scottishswimming.com](mailto:wellbeingprotection@scottishswimming.com), and for case management and concerns [safesport@scottishswimming.com](mailto:safesport@scottishswimming.com)

**Subject of Concern** – an individual against whom a safeguarding concern has been raised with a club or Scottish Swimming.

**Wellbeing & Protection Officer** – any Wellbeing & Protection Officer (WPO) for a Scottish Swimming affiliated club or composite team.

### 2.1 Principles of Safeguarding

The six widely accepted principles of safeguarding are explained below. These are essential for protecting those at risk within our aquatic sports and ensuring the appropriate support is in place for everyone.

#### Empowerment

- Talk to the young person – Involve them in decision making processes
- Involve them by giving them the opportunity to have their say
- Provide information to help them make informed decisions

#### Proportionality

- Consider the level of risk that situations present
- Respect the young person and those involved
- Only get involved as much as needed

#### Partnership

- Clubs and Organisations should work together to safeguard young people
  - Members have a part to play in preventing, detecting and reporting abuse and concerns

#### Protection

- Know what to do if there are concerns (who to involve, how to handle situations)
- Offer help and support where needed
- Ensure information is passed onto others as required

#### Prevention

- Create a culture where participants feel able to discuss issues/concerns
  - Information provided is clear, simple and accessible
  - Young people are clear of the expected standards of behaviour of themselves and others
- It is better to take action before harm occurs

#### Accountability

- Safeguarding is everybody’s business
- Everyone must accept that we are all accountable as individuals, and as clubs
- Roles and responsibilities must be clear so that people can see and check how safeguarding happens

## 3.0 Key Principles & Promoting Good Practice

Safeguarding children and young people in your club is an integral part of the club's activities. It seeks to create a culture that provides a safe and happy environment in which children can learn to swim and develop to a level appropriate for their ability. Aquatic sports should be enjoyable and fun, including the competitive aspect at whatever level undertaken, giving each individual a sense of achievement and satisfaction from taking part.

This policy is based on the key principles:

- The wellbeing of children and young people is the primary concern
- All children and young people, whatever their age, culture, disability, sex, gender reassignment, language, racial origin, socio-economic status, religious belief and/or sexual identity have the right to protection from all forms of harm, poor practice, exploitation, bullying and abuse
- Children and young people have the right to express views on all matters which affect them, should they wish to do so
- The voice of the child is essential in developing our aquatic sports and opportunities must be explored regularly by clubs and Scottish Swimming to ensure this is optimised
- Safeguarding and child protection is everyone's responsibility
- All suspicions, disclosures and allegations of abuse will be taken seriously and responded to swiftly and appropriately
- Adults working with children are provided with opportunities for education and training to ensure best practice becomes the norm
- Working in partnership with children and young people and their parents/carers is essential for the promotion of an inclusive sport and a safe enjoyable environment

The promotion of good practice is essential for all roles that enable our aquatic sports to happen. This includes direct support roles for children and young people such as Coaches, Team Managers and WPOs. Good practice must be embedded within how our clubs and members operate and behave, and any poor practice reported and challenged quickly by WPOs and Scottish Swimming as appropriate.

Effective safeguarding systems are child centred. Failings in safeguarding systems are too often the result of losing sight of the needs and views of the children within them or placing the interests of adults or the organisation's reputation ahead of the needs of children.

In 'Working Together to Safeguard Children 2023', it states that children are clear about what they want from an effective safeguarding system:

- **Vigilance:** to have adults notice when things are troubling them
- **Understanding and action:** to understand what is happening; to be heard and understood; and to have that understanding acted upon
- **Stability:** to be able to develop an ongoing stable relationship of trust with those helping them
- **Respect:** to be treated with the expectation that they are competent rather than not
- **Information and engagement:** to be informed about and involved in procedures, decisions, concerns and plans
- **Explanation:** to be informed of the outcome of assessments, decisions and reasons when their views have not been met with a positive response
- **Support:** to be provided with support in their own right as well as a member of their family
- **Advocacy:** to be provided with advocacy to assist them in putting forward their views
- **Protection:** to be protected against all forms of abuse and discrimination

### Safeguarding children is everyone's responsibility!

Everyone who works with children has a responsibility for keeping them safe; this includes teachers, coaches and all who are employed or volunteer to work with children in the sport sector. No single person can have a full picture of a child's needs and circumstances and, if children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action. Effective safeguarding requires clear local arrangements for collaboration between practitioners and agencies.

## 4.0 Roles & Responsibilities of Safeguarding in Scottish Swimming & Clubs

### 4.1 Scottish Swimming:

- Promote the health and wellbeing of children and young people by providing opportunities for them to take part in aquatics safely
- Respect and promote the rights, wishes and feelings of children and young people
- Promote a positive safeguarding culture within Scottish Swimming activities and support and encourage clubs to operate positively and improve their culture
- Support and encourage the Club network to promote opportunities to champion the voice of the child (athlete) within and across each sport
- Appoint a Safeguarding Manager to provide leadership to WPOs and guidance on child wellbeing and safeguarding matters
- Promote and implement appropriate policies, procedures, support and guidance to safeguard the wellbeing of children and protect them from abuse
- Recruit, train, support and supervise staff and volunteers to adopt best practice to safeguard and protect children from abuse and to reduce risk to themselves
- Require staff, affiliated clubs and volunteers to adopt and abide by this safeguarding policy and supporting appendices and procedures
- Respond to any allegations of misconduct or abuse of children in line with this Policy and these procedures, seeking advice as required from the Children First Case Management Support Service or any other advisory body considered by Scottish Swimming to be appropriate, further to any guidance published from time to time in connection with the same, including the Case Management Support Service Guidance Document (or equivalent); as well as implementing, where appropriate, the relevant disciplinary and appeals procedures as per Scottish Swimming's' Constitution (R12.0 – R13.0)
- Maintain confidential records of all complaints, concerns and sanctions against clubs and individuals utilising a case management system (Globocol). Provide the Globocol Club Portal to all clubs to allow for low level concerns reporting and recording as well as facilitating a referral option to Scottish Swimming Safeguarding Team.
- Ensure best practice is extensively promoted, and clubs, coaches/teachers, officials and all members are encouraged to follow guidelines set down by Scottish Swimming
- Provide a suitable programme of training via the inclusion and integration of Safeguarding, Wellbeing and Child Protection issues within Scottish Swimming's coach education programmes as well as specific training opportunities for club members to attend workshops:
  - Child Wellbeing and Protection in Sport (CWPS) workshops
  - Child Wellbeing & Protection in Sport Officer Training (CWPO) workshops
  - WPO Networking sessions and CPD opportunities
  - Other relevant training on contemporary issues
- Recruit and maintain a Case Management Review Group (CMRG) to support with making case management and case review decisions
- Recruit and maintain a Safeguarding representative on the Scottish Swimming Board
- Maintain registration as an umbrella body with Disclosure Scotland to facilitate a Protecting Vulnerable Groups (PVG) service on behalf of clubs to prevent unsuitable people from working within aquatic sports
- Require all member clubs and Districts to adhere to Scottish Swimming's Safer Recruitment Policy
- Require all those who are deployed by Scottish Swimming to work with children including those who act in a pastoral role whilst on trips, to attend child protection training and have a PVG in place
- Apply appropriate safeguarding compliance and sanction measures to ensure required standards of safer recruitment and training are in place
- Require those attending sport roles (i.e. coaches, athletes) at national events to apply for an event pass to gain entry to the field of play
- Regularly monitor and evaluate the implementation of this policy and these procedures

## 4.0 Roles & Responsibilities of Safeguarding in Scottish Swimming & Clubs (continued)

### 4.2 Affiliated Clubs:

- Adopt the Club Wellbeing & Child Protection Statement and adhere to the guidelines and procedures contained within this Safeguarding Policy
- Appoint at least one WPO in accordance with Scottish Swimming requirements for club affiliation. Good practice would be for clubs to have a second WPO to provide additional support to members
- Accept that all office bearers and committee members have a responsibility for wellbeing and child protection and be prepared to respond to any indication of abuse or poor practice
- Safely recruit club volunteers/staff in accordance with the Safer Recruitment Policy. In addition to the Safer Recruitment Policy the club must have a recruiting with convictions policy, PVG Referrals Policy, Secure Data Handling Policy and a Safeguarding Data Policy in place
- As part of the Safer Recruitment Procedure, clubs must have a Safer Recruitment Statement in place for members as well as at least one ID Checker contract signed by a WPO and a Club PVG Processing Contract in place signed by the Chairperson and a WPO
- Champion best practice and implement Scottish Swimming guidelines on key areas, such as minimum coach-to-athlete ratios, transporting children, accident reporting, behaviour management, consent forms, social media, overnight trips/accommodation, safe use of public facilities
- Have all volunteers, coaches, swimmers and parents agree to and sign the club's code of conduct on an annual basis or more frequently if required
- Ensure the Rights of the Child are at the forefront of decision making and provision of sporting activity and support for members within the club. Distribute information on the Rights of the Child to members as required or considered appropriate
- Champion the voice of the athlete by providing opportunities to give feedback on their sporting activity as well as enabling young people to be part of the decision-making processes within the club and helping to shape the development of their sport/club
- Promote a positive safeguarding culture within the club, where members feel supported, and concerns can easily be raised and managed effectively
- Promote an environment where all legitimate concerns can be raised without fear of victimisation or reprisal
- Support members by having anti-bullying, discipline and mobile phone, digital communication and social media policies in place
- Be prepared to challenge, alter and record poor practice being shown by a club member
- Ensure that safeguarding cases which are dealt with by the club are reviewed once concluded in line with the club's case management review policy
- Require all those working in a regulated role to attend and have an active CWPS course and have a satisfactory PVG check
- Operate within the compliance and sanction measures in place regarding safer recruitment and safeguarding training requirements
- Implement any recommendations of Scottish Swimming relating to the area of safeguarding

**Report child wellbeing & protection concerns to Scottish Swimming for recording and support within 48 hours of the incident occurring. This includes reporting low-level concerns to Scottish Swimming.**

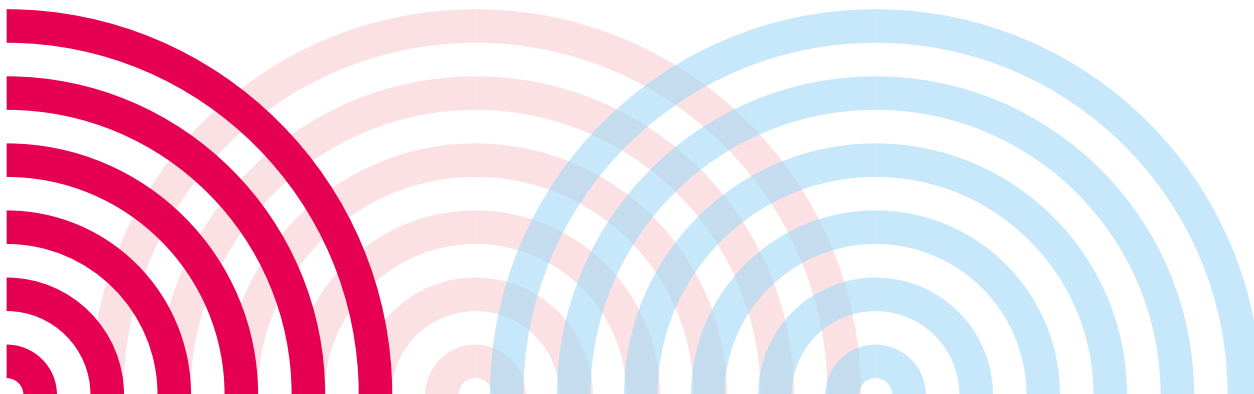
## 5.0 The Role of the Club Wellbeing & Protection Officer

Every Club must have a minimum of one WPO in place. Recommended safeguarding practice would be for clubs to appoint two WPOs to be in place to support members. The WPO role is essential in providing a first point of contact for children and adults within the club who have a safeguarding or wellbeing concern. In conjunction with the club committee, the WPO must also ensure that the club is adopting and implementing the various safeguarding policies and procedures, which are necessary for it to demonstrate its duty of care to members.

The importance of appointing the right person cannot be underestimated. The appointed individual may be involved in the most private aspects of members' lives. They may have to take part in meetings and discussions with the Police and statutory agencies. They must show that they are able to handle matters of a wellbeing and protection nature in an appropriate and confidential manner. Support is available from the Scottish Swimming Safeguarding Team.

### 5.1 Roles & Responsibilities:

- Raise awareness of and assist the club in implementing the Scottish Swimming Safeguarding policy
- Assist the club in putting plans in place for children and young person safeguarding and advise the club committee on matters of policy relating to child wellbeing, safeguarding and protection
- Act independently and in the best interests of any child or young person at the club
- Ensure all persons working either paid or unpaid with children and young people at the club are fully aware of what is required of them within the guidelines of their club, the Wellbeing and Protection Policy and codes of conduct
- Ensure the club has codes of conduct in place for staff, volunteers, coaches, competitors and parents/guardians which should be renewed annually or sooner if appropriate
- Ensure that the safer recruitment policy and processes are being implemented and relevant club members, volunteers and staff have a PVG check if appropriate. This must be renewed every five years and there must be an opportunity to access CWPS training, which is renewable every three years
- Conduct the administrative work associated with processing of information on volunteers/staff PVG scheme applications and self-declarations in line with the Safer Recruitment Policy
- Liaise closely with club volunteers/staff ensuring that agreed procedures for the prevention of risk are being followed
- Carry out the case management process from investigation through to conclusion for all wellbeing concerns raised to the club, with the support of Scottish Swimming as required
- Be aware of and have a note of contact details of Police (101 non-emergency or 999 emergency), Local Authority Social Work team and the Scottish Swimming Safeguarding Team
- Ensure all incidents are correctly recorded, referred and reported in accordance with Scottish Swimming policy and procedures
- Ensure that cases are reviewed once completed in conjunction with Scottish Swimming (as appropriate) as per the Club's case management review policy



## 5.0 The Role of the Club Wellbeing & Protection Officer (continued)

### 5.1 Roles & Responsibilities (continued):

- Ensure confidentiality is maintained and information is only shared on a 'need-to-know' basis within the Club committee
- Introduce themselves to members (and if children, their parents/guardians) and ensure they know who to contact and how to access the safeguarding arrangements at the Club
- Act as the first point of contact for coaches/teachers, helpers, club volunteers, parents and participants on any issues concerning the wellbeing of children within the club, (poor practice or alleged abuse) as well as matters relating to safeguarding or child protection at the club
- Work with the Scottish Swimming Safeguarding Manager on education, training and case management for the club
- Drive change within the club to develop a positive safeguarding culture across the club to ensure members feel comfortable raising concerns and instil confidence that concerns will be taken seriously
- Ensure that the voice of an athlete is championed throughout the club and that athletes have opportunities to feedback on their experience as well as being involved in the decision-making processes within the club
- Ensure that the club is championing the rights of children and young people in the activities it promotes and how it operates on a day-to-day basis

### 5.2 How to appoint a WPO:

When the club identifies an individual who is willing and able to fulfil the commitments of the role, a nomination form is required to be completed and submitted to [wellbeingprotection@scottishswimming.com](mailto:wellbeingprotection@scottishswimming.com). An induction meeting will be organised by one of the Scottish Swimming Regional Development staff to support the new WPO. The club should follow the Scottish Swimming Safer Recruitment Policy.

#### The WPO must be someone who:

- Is able to act independently and in the best interests of the child or adult at risk
- Is an adult (18+) and is not an active teacher or coach in the club
- Is, where possible, not related to, or in a relationship with the Head Coach or an assistant coach of the club. This is best practice
- Is, where possible, not related to, or in a relationship with, the Chairperson or Vice Chairperson of the club. This is best practice
- Is able to attend the club frequently and be available for club members
- Has the time to fulfil the role and is prepared to complete all of the core tasks
- Can satisfy the requirements, core skills and knowledge areas needed for the role
- Is prepared to undergo the training and PVG check required

The above requirements are best practice to avoid difficulties that could arise should someone wish to refer a concern to the WPO but feels unable to do so, or the WPO feels unable to deal with the concern, due to a conflict of interest. Should a conflict of interest arise, the WPO must contact the Scottish Swimming Safeguarding Team to discuss this situation to seek further advice.

The names and contact details of the WPO(s) must be clearly communicated and publicised to all members. This ensures that should anyone at the club have a concern they are clear on whom they can refer that concern to. Best practice would be for the email address used by a WPO to not be a personal email account and should be formatted in a way that references both the role of WPO and the club.

## 6.0 Key Contact Information

### Scottish Swimming Safeguarding Team Contacts:

- The generic safeguarding team inbox which is monitored office hours daily – **wellbeingprotection@scottishswimming.com**
- The case management inbox which is regularly monitored by the Safeguarding Team is **safesport@scottishswimming.com**. All incident forms and any correspondence regarding a concern or a case should be submitted to this email address.
- The Scottish Swimming Safeguarding Policies and supporting information can be found on the **Scottish Swimming Website**

### Sean Dawson Safeguarding Manager

Point of contact for policy development, safeguarding concerns and case management

**s.dawson@scottishswimming.com**

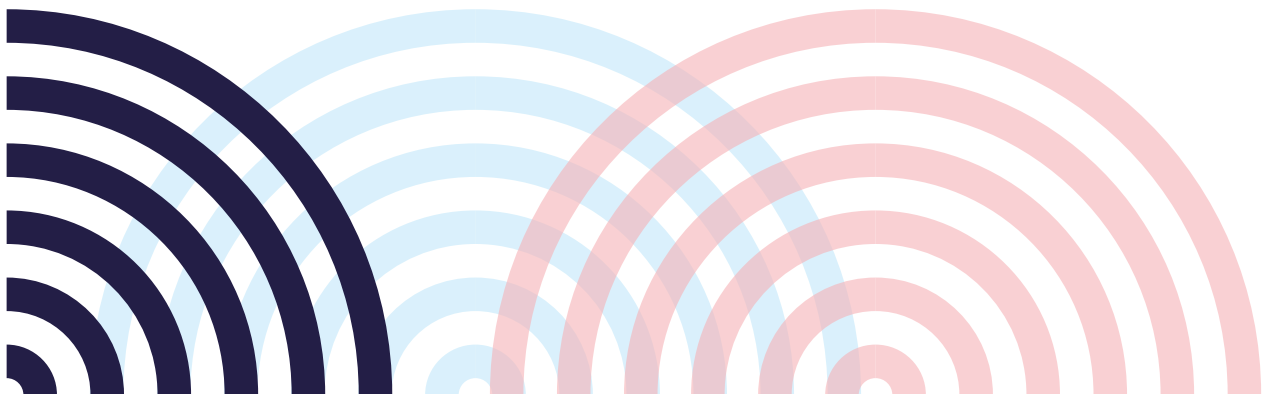
07801 578967

### Natasha Hofton Safeguarding Officer

Point of contact for Safer Recruitment, safeguarding related processes and resources

**n.hofton@scottishswimming.com**

07511 222209 / 01786 466530



## 7.0 Monitoring & Review of Policy

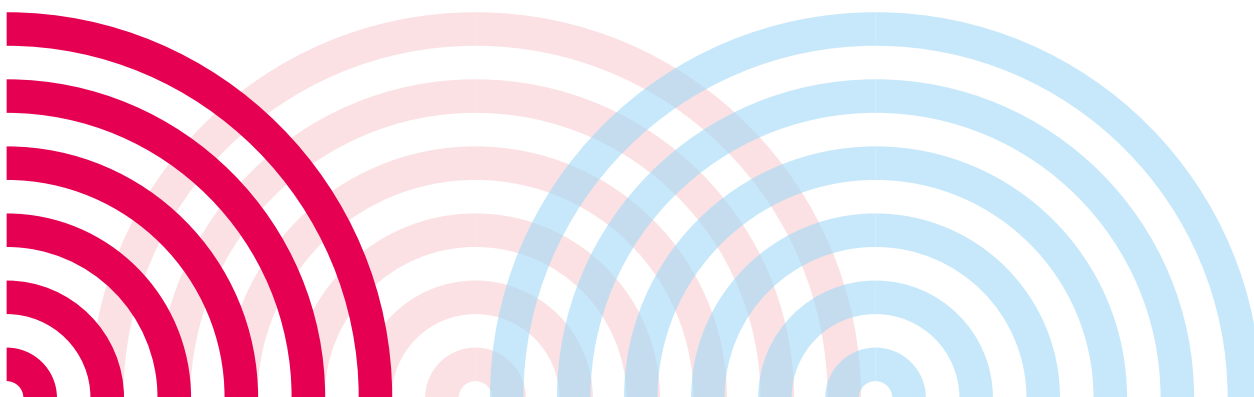
It is essential that the contents of this Safeguarding Policy are kept up to date to ensure the correct standards of safeguarding are in place to support and protect our members and clubs within the aquatic sports. This policy and these procedures will be regularly monitored and reviewed, with a full review being carried out every two years.

The policy and procedures will also be reviewed in the following circumstances:

- In accordance with changes in Scottish or UK Government legislation
- Changes in Scottish Swimming procedures or governance
- Following any issues or concerns raised about the protection of children and young people within Scottish Swimming
- As a result of case management trend analysis identifying areas for improvement
- As a result of changes in the industry standards of best and poor practice being updated
- As a result of a Home Nation partner changing its policies which also affects Scottish Swimming members/clubs
- On advice from Harper Macleod, sportscotland, Children First or a statutory agency

This policy will be monitored by:

- The Safeguarding Manager and the Safeguarding team on a regular basis, reporting any issues quarterly to the Scottish Swimming Management Team
- Keeping records of cases brought and their outcomes
- Utilisation of the case management review policy and recording lessons learned
- Accepting feedback from clubs on the ease of implementation and effect of the policy
- At least once per year the Scottish Swimming Board will receive a report which details any changes required to the policy and a summary of cases managed



## 8.0 Building a Safer Culture

Everyone at Scottish Swimming is dedicated to making our aquatic sports accessible, inclusive and safe for people of all ages and backgrounds. We recognise we must continuously strive to improve in order to foster a positive culture and deliver support for our members who are the lifeblood of our sports. Our clubs and members play an essential part in driving and embedding the shared culture we wish to have within our sports. A lot of what Scottish Swimming and clubs do and how we operate daily impacts on the culture of the sport and the culture within clubs. A selection of culture influencing factors is detailed below:



### 8.1 To Do

In order to drive forward change to ensure our culture is safe, positive and inclusive, all those who work or volunteer directly with children and young people **must ensure that:**

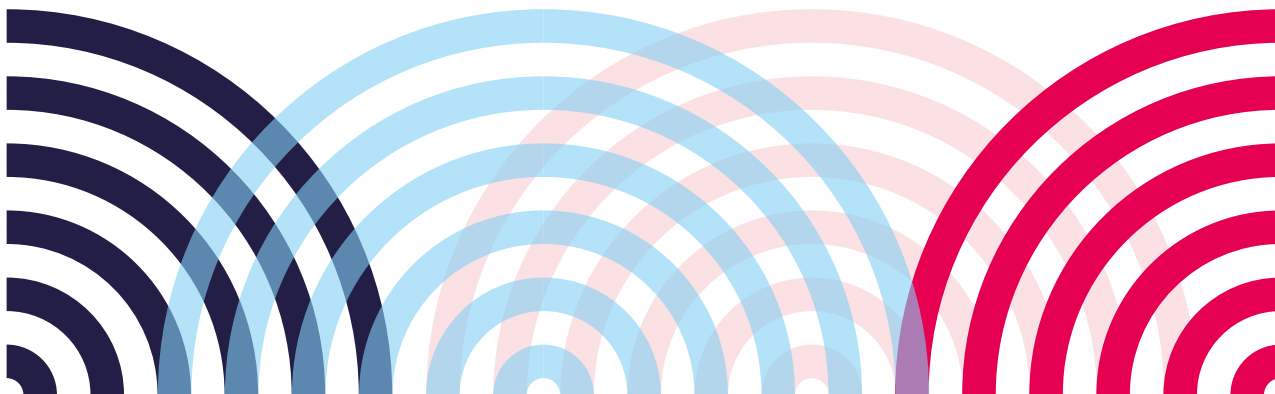
- Members are treated with dignity and respect but are challenged appropriately when an individual doesn't demonstrate acceptable practice and behaviours
- Good practice is promoted, in order to reduce the possibility of abusive situations occurring
- They continually reflect upon their own coaching, supervisory style, philosophy and practice to ensure the safety and wellbeing of members at all times and encourage others to do the same
- They know and understand Scottish Swimming's Safeguarding Policies and associated procedures
- They always work appropriately and openly with children and young people in the club
- They are an excellent role model, which includes not smoking or drinking alcohol in the company of children
- They always put the wellbeing, health and safety of a member before all other considerations, including the development of performance
- They build a balanced relationship based on mutual trust, which empowers members, including children and young people, to share in the decision-making process
- They follow the required safer recruitment policy and requirements ensuring PVG check, and safeguarding training is completed as necessary
- They refer and address safeguarding concerns appropriately
- Coaches and teachers to keep their technical skills and qualifications up to date
- Have open and regular communication with parents/guardians of child members
- Utilise the voice of athletes for feedback and involve young people in the decision-making processes in the club as appropriate
- Ensure that activities are appropriate for a member's age, maturity, experience and ability
- Promote honesty, teamwork and a good sporting environment
- Have respect for, and encourage members to have a life outside of aquatics, and account for such where necessary

## 8.0 Building a Safer Culture (continued)

### 8.2 To Avoid

In order to drive forward change to ensure our culture is safe, positive and inclusive, all those who work or volunteer directly with children and young people **must not**:

- Take children or young people to their home or other secluded places where they will be alone. This includes changing room cubicles
- Engage in rough, physical or sexually provocative games or make sexually suggestive remarks to children
- Never use physical force on a child, for example hitting or slapping a member or engage in any form of inappropriate touching
- Share overnight accommodation with a child or young person
- Reduce a child or young person at risk to tears as a form of control
- Use physical exercise or any form of humiliation as a punishment to a member, for example making a member perform sit ups or press ups on poolside in front of their peers
- Allow members to use inappropriate language or behaviour unchallenged
- Allow allegations made by a member to go unrecorded, or not acted upon
- Abuse their position of power or trust with children or resort to bullying tactics or verbal abuse
- Cause a child or young person to lose self-esteem by embarrassing, humiliating or undermining the individual
- Spend excessive amounts of time with one member to the detriment of the squad/team
- Do things of a personal nature for children or young people that they can do for themselves
- Engage in a sexual, including online or non-contact in nature, relationship with a child aged 17 or under
- Give a lift to, or otherwise transport, an individual child (unless they are a family member) when unaccompanied



## 9.0 Duty of Care

The Children Act 2004 places duties on a range of organisations and individuals to ensure their function and any services they contract out to others are discharged having regard to the need to safeguard and promote the wellbeing of children. Scottish Swimming and its affiliated clubs have a duty of care to members. Paid and volunteer staff have a duty to be aware of their responsibilities for safeguarding and promoting the wellbeing of children, how they should respond to child protection concerns and make a referral to the local authority Children's Social Services, Police, or other agencies if necessary.

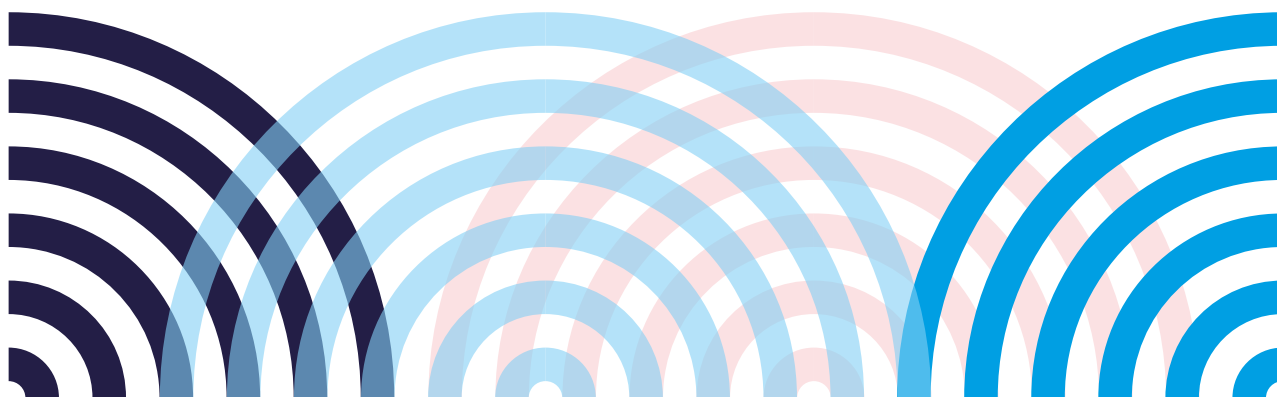
Scottish Swimming is the national governing body (NGB) for aquatic sports in Scotland, and as such receives funding from sportscotland to support the delivery of its activities. As a funded NGB, Scottish Swimming meets the standards for safeguarding and protecting children in sport as required by **sportscotland** and Children First.

Each club has a duty of care towards its members and as it's a code of practice, Clubs must adopt the Scottish Swimming Safeguarding Policy as a condition of annual affiliation. All Scottish Swimming members must comply with the Scottish Swimming Safeguarding Policy and appendices, other codes of practice and the rules and regulations of the aquatic sports.

To meet its safeguarding duty of care Scottish Swimming clubs **must:**

- Follow the policies and procedures in the Wellbeing & Protection (Safeguarding) Policy in full and use it as required
- Promote and raise awareness of the Scottish Swimming Safeguarding Policy and associated appendices to all of their members
- Ensure the safer recruitment policy is embedded within club procedures
- Ensure all of their members are aware of their responsibilities and the procedures to be followed in the event of any concerns about a child or young person's safety or wellbeing
- Promote a culture of listening to children and young people

Anyone involved in our sports can contact the Scottish Swimming Safeguarding Team for advice or guidance on Safeguarding concerns. If the team are unavailable for any reason, or failure to act immediately may place a child or young person at risk of harm, then immediate contact should be made with Police, Children's Social Services, or other agencies as appropriate.



## 10.0 Athlete Voice

Scottish Swimming is implementing a refreshed approach to ensuring that the aquatic athlete community has an opportunity to input into the future direction of Aquatics in Scotland and to provide an open and transparent opportunity for athletes to provide feedback on all areas across the sport, from joining a club through to performance levels.

The recommendations from the Whyte Review (2022) and the Swim England Listening Report (2024) included increasing the importance and value placed on the athlete voice, leading to Scottish Swimming's commitment to ensuring that the voice of the athlete, including across sport representation, be enhanced. By embracing this approach, Scottish Swimming can help to make opportunities within the sport more relevant, enjoyable, as well as ensure environments are enhanced and appropriate at all levels.

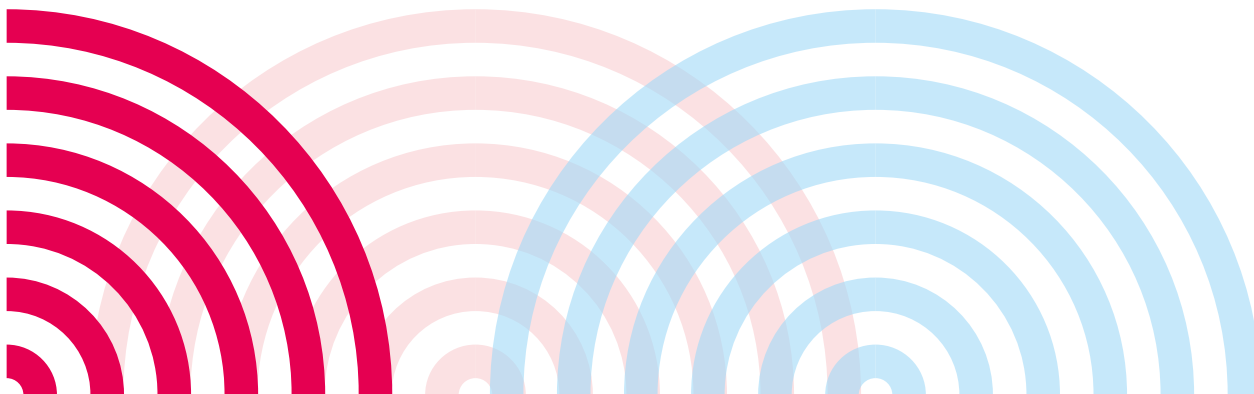
### Athlete Opportunity to Provide Feedback

### Athlete Involvement in Decision Making Processes

Scottish Swimming affiliated clubs play an essential part of increasing the athlete voice across the sports both at club and national level. Scottish Swimming is looking to support clubs to increase participation in the following two areas:

1. Seeking the views and opinions of their athletes regularly
2. Involving athletes in the decision-making processes within the club

Information regarding examples of what clubs could introduce to increase the voice of their athletes in their activities and the role Scottish Swimming plays can be found in Safeguarding Guidance Appendix SG30. Additional support for clubs will be developed and become available through the Scottish Swimming website in due course.



# 11.0 Introducing & Embedding the Rights of the Child

## 11.1 What are children’s human rights?

Everybody, including children, has human rights. Human rights make sure that everyone is safe, healthy and treated with respect. Children have special rights because they need extra protection, care and support during childhood (from birth to age 18). In 1989, the United Nations (UN) developed the Convention on the Rights of the Child (UNCRC). The UNCRC was written to detail all the human rights that belong to children, and it was signed by the majority of nations, including the UK. It helps us to understand the rights and freedoms that all children should have. Children’s human rights always put the best interests of children first.

Important ideas and words to remember about the UNCRC are:

### Universal

Children’s human rights belong to everyone under 18

### Inalienable

Rights shouldn’t be taken away from children and young people

### Indivisible

Rights can’t be separated from each other – they’re all important

### Interdependent

Different rights depend on each other to make sense and work together

## 11.2 What does this mean for Scottish Swimming and affiliated clubs?

On 16th July 2024 the UNCRC Incorporation (Scotland) Act 2024 became law. This requires Scottish Swimming and its affiliated clubs to embed a rights-based approach into its sporting and non-sporting activities as necessary.

Scottish Swimming understands it requires to support and inform clubs about the introduction and ongoing obligation of this legal requirement and how introducing a rights-based approach to delivering club activities would benefit their young members. Championing the rights of the child/young person brings many benefits to both the club and the young people, and much of what Scottish Swimming and affiliated clubs currently deliver is inclusive of these Rights already. It is imperative that Scottish Swimming and its clubs can demonstrate that a rights-based approach is at the heart of our aquatic activity.

The following table details the 14 articles from the UNCRC that apply the most to Scottish Swimming and affiliated clubs along with an explanation of what each article means from a Scottish Swimming application point of view. Clubs should be able to evidence how each of the identified 14 articles are included within their activities.

## 11.0 Introducing & Embedding the Rights of the Child (continued)

### 11.3 What are the key 'Rights' that Scottish Swimming & clubs need to implement in Aquatics?

Article Number	Scottish Swimming application of the UN CRC Articles
 2 Non-Discrimination (Article 2)	Scottish Swimming and clubs must ensure that no child or young person should face discrimination of any kind while participating in aquatics.
 3 Best Interests of the child (Article 3)	Scottish Swimming & clubs must take the best interests of the child as top priority when making decisions that affect the children and young people in aquatics.
 6 Life, survival & development (Article 6)	Scottish Swimming and clubs must ensure that they do all they can to ensure children and young people have the opportunity to develop to their full potential as a person and as an athlete.
 12 Respect for the views (Article 12)	Every child has the right to express their views, feelings and wishes in all matters affecting them, and to have their views considered and taken seriously by their club and Scottish Swimming.
 13 Freedom of expression (Article 13)	Scottish Swimming and clubs must allow every child to express their thoughts and opinions and to access information that they need, as long as it is within the law.
 15 Freedom of association (Article 15)	Scottish Swimming & clubs must ensure that every child has the opportunity to meet with other young people and to join groups and other clubs, as long as this does not stop other young people from accessing and enjoying opportunities.
 16 Right to privacy (Article 16)	Scottish Swimming and clubs must protect the child and young person's right to privacy. This includes their private, family and home life and against attacks that potentially harm their reputation.
 17 Access to Information from the Media (Article 17)	Scottish Swimming and clubs must support children and young people with accessing reliable information from the media, protect them from the effects of media attention and ensure information within aquatics is available in a child friendly version.
 19 Protection from violence, abuse & neglect (Article 19)	Scottish Swimming & clubs must do all they can to ensure that children are protected from all forms of violence, abuse, neglect and bad treatment by their coaches, parents or anyone else who looks after them.
 23 Children with a disability (Article 23)	Scottish Swimming and clubs must support children and young people with disability access appropriate opportunities for them from learn to swim stage through to wherever their potential takes them within the aquatic sports.
 27 Adequate standard of living (Article 27)	Scottish Swimming and clubs must support children and young people to enable them to develop physically and socially within their aquatic activities allowing them to have a good standard of living.
 28 Right to Education (Article 28)	Scottish Swimming and clubs have the responsibility to ensure that all children and young people are able to access learning and development opportunities in the sport and their attendance at school should not be impacted by aquatics activities where at all possible.
 29 Goals of Education (Article 29)	Scottish Swimming and clubs must provide supportive environments and programmes whereby children and young people can develop their personality, talents and abilities to the full as well as developing their respect for others.
 31 Leisure, play & culture (Article 31)	Scottish Swimming and clubs must ensure that children and young people can participate in aquatics in a relaxed environment and have the opportunity to access appropriate competitions as well as being able to explore other sports and activities, while ensuring that the young people have sufficient opportunity to rest and recuperate.

Clubs should consider how a rights-based approach to delivering club activities would benefit their young members. Championing the rights of the child brings many benefits to both the organisation and the young people, and a lot of what Scottish Swimming and clubs currently deliver is inclusive of these Rights.

Support and best practice examples of how to embed the rights of the child in club activities and processes is available to clubs from Scottish Swimming with more information to support clubs being developed and made available when possible. Additional information can also be found in Safeguarding Guidance Appendix SG30.

# 12.0 Safer Recruitment Policy & Process

## 12.1 The Process

All aquatics clubs have a variety of volunteers and staff who assist with the overall running of the club. Whilst it is vital to keep the issues of wellbeing & protection in proportion, Scottish Swimming affiliated clubs must have implemented a safer recruitment policy. Safer recruitment is an essential part of our wellbeing and safer sport practice; it is our commitment to ensuring that those who are recruited in paid or unpaid roles in the aquatic sports are suitable to work with children and young people.

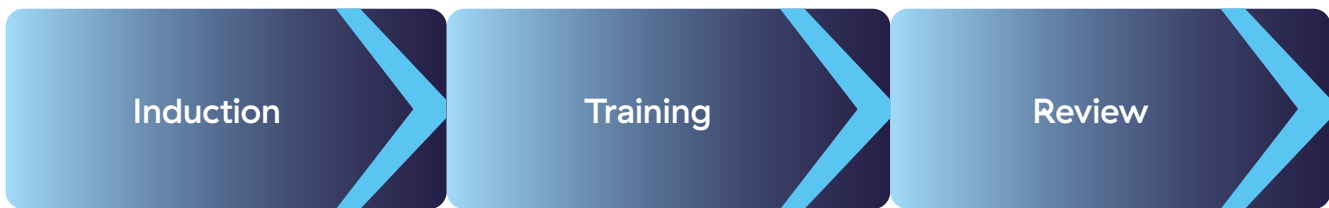
Abusers of children tend to gravitate to situations where little vetting or checking takes place. It is impossible to know who could abuse children. Therefore, it is important that all reasonable steps be taken to ensure unsuitable people are prevented from working with children and young people. It is also important that standardised procedures are used, whether people are in regulated roles or not, paid or unpaid, part-time or full-time.

For **all** volunteers/staff working or applying to work in a regulated role within a club, the Safer Recruitment Process requires the following steps to be undertaken:

### Before appointing the new club member to a role:



### After appointing the new club member to a role:



#### 1. PVG Scheme Membership – for regulated roles only

A PVG Scheme application must be processed for everyone carrying out a regulated role involved in your club. Under the Disclosure (Scotland) Act 2020 it is a legal responsibility for clubs to process a PVG check for everyone who is in a regulated role. Minimum age for a PVG check is 16. The role cannot be commenced before a PVG is in place. The club WPO will assist a member to complete the PVG application as appropriate. PVGs check an individual's suitability to work with children and young people and adults at risk. Scottish Swimming will assess the individual's suitability for carrying out the regulated role based on the information on the disclosure certificate and will inform the club WPO of the outcome. If a volunteer is not carrying out a regulated role, this step can be omitted.

#### 2. ID checks – all volunteers and staff

As part of the process for applying for a PVG the club will need to confirm the identity of the member through an ID check as per the club's ID checker contract. ID checks must be carried out in accordance with the Disclosure Scotland Code of Practice.

#### 3. Self-Declaration – all volunteers and staff

Everyone applying for a regulated role within a club must complete a self-declaration form for the club to review. For all other roles completion of a self-declaration form is recommended. The completion of a volunteer self-declaration form allows the individual to disclose any criminal convictions and investigations to support the recruitment decision. The club will retain the form in accordance with their secure handling policy.

## 12.0 Safer Recruitment Policy & Process (continued)

### 12.1 The Process (continued)

#### 4. Reference Checks – all volunteers and staff

Everyone applying for a regulated role within a club must provide two individual references for the club to review. For all other roles provision of references is recommended. References are required from at least two people (not relatives) who have known the applicant for at least two years. Referees must be able to comment confidentially on the person's suitability for the role being applied for and experience working with children and young people and/or adults at risk.

#### 5. Interviews – at discretion of the club

There may be occasions when an interview is required to support the recruitment of a volunteer. A simple, informal interview to assess the applicant and attempt to verify all information given can be held for voluntary posts. Where a club is looking to employ/contract an individual, then employment law governs recruitment processes and a full recruitment process including an interview would be required.

#### 6. Induction – all volunteers and staff

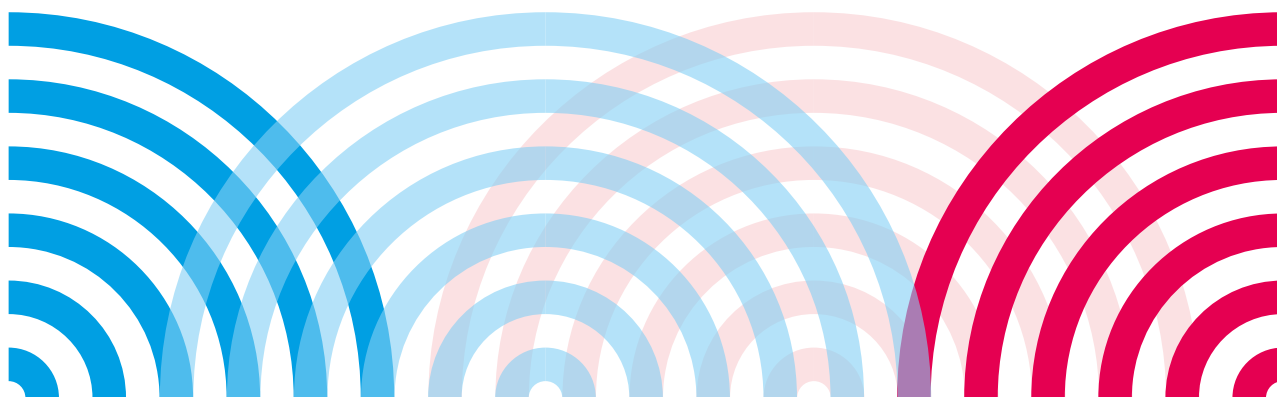
An induction procedure for all new starts is recommended. New starts should be made aware of their responsibilities and are made aware of the relevant club policies. They are also required to sign the appropriate Codes of Conduct. A period of probation is advisable.

#### 7. Training – all volunteers and staff

The completion of the Child Wellbeing & Protection in Sport (CWPS) workshop is mandatory for all individuals in a regulated role within the club. This must be renewed every three years. The completion of the CWPS workshop is recommended for all other roles working within the club. Those in a regulated role must continue to have an active CWPS credential in place.

#### 8. Membership – all volunteers and staff

All volunteers and staff active within the club must become members of Scottish Swimming under the rules and regulations of the Scottish Swimming Constitution. C3.3.9 – A club failing to ensure that all volunteers that assist a club, no matter how irregularly, are members of Scottish Swimming, will be deemed to be operating outside the Association's remit. As this remit forms the basis of the Company Insurance Policy the insurance cover for the club may be affected.



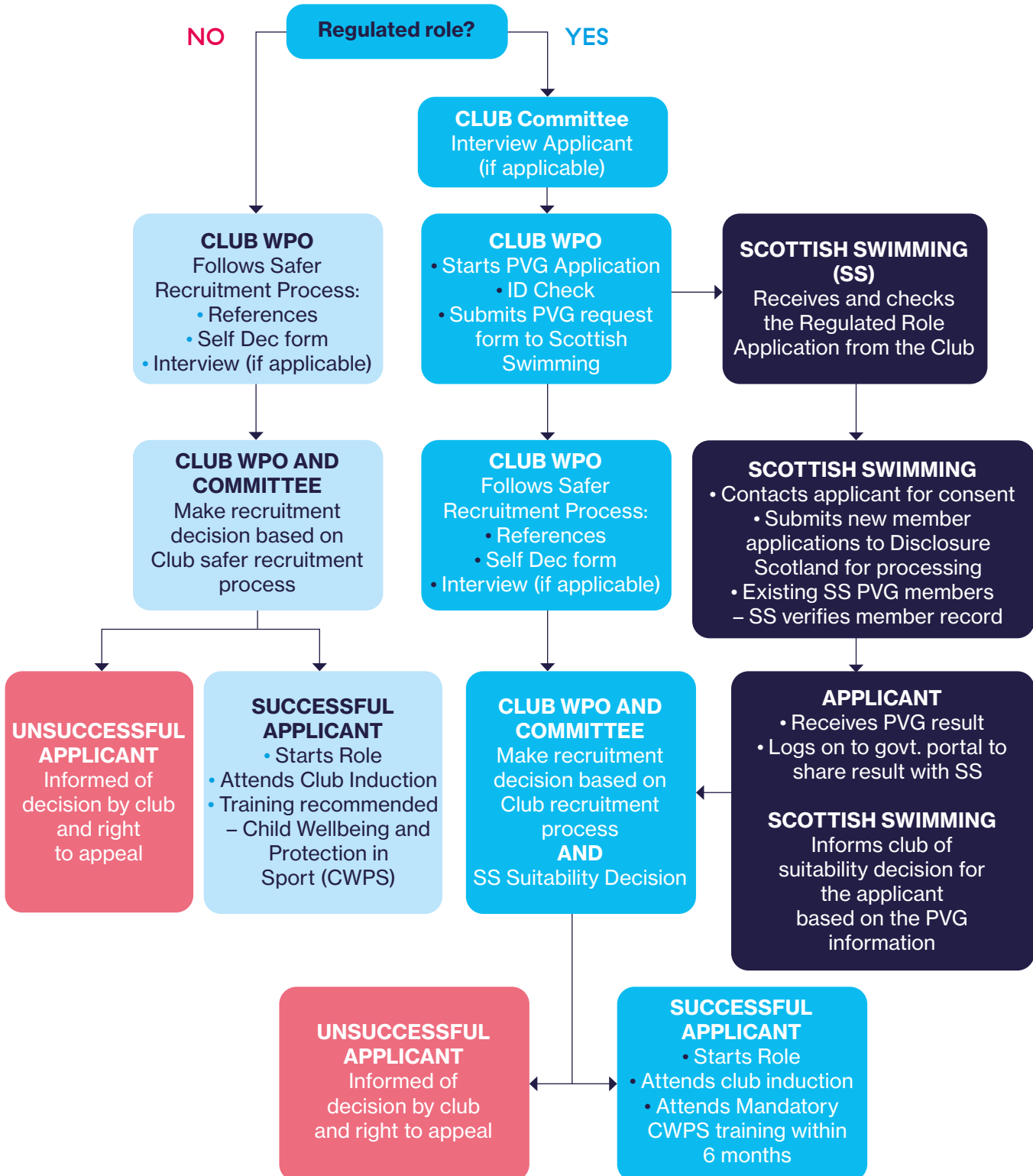
## 12.0 Safer Recruitment Policy & Process (continued)

### 12.2 Recruiting with convictions

It is important to recognise that having a criminal record does not necessarily mean that someone cannot work or volunteer for our organisation. For further information please see the Safeguarding Appendix SR7 (Recruiting with Convictions policy). Additional support is available from the Scottish Swimming Safeguarding Team.

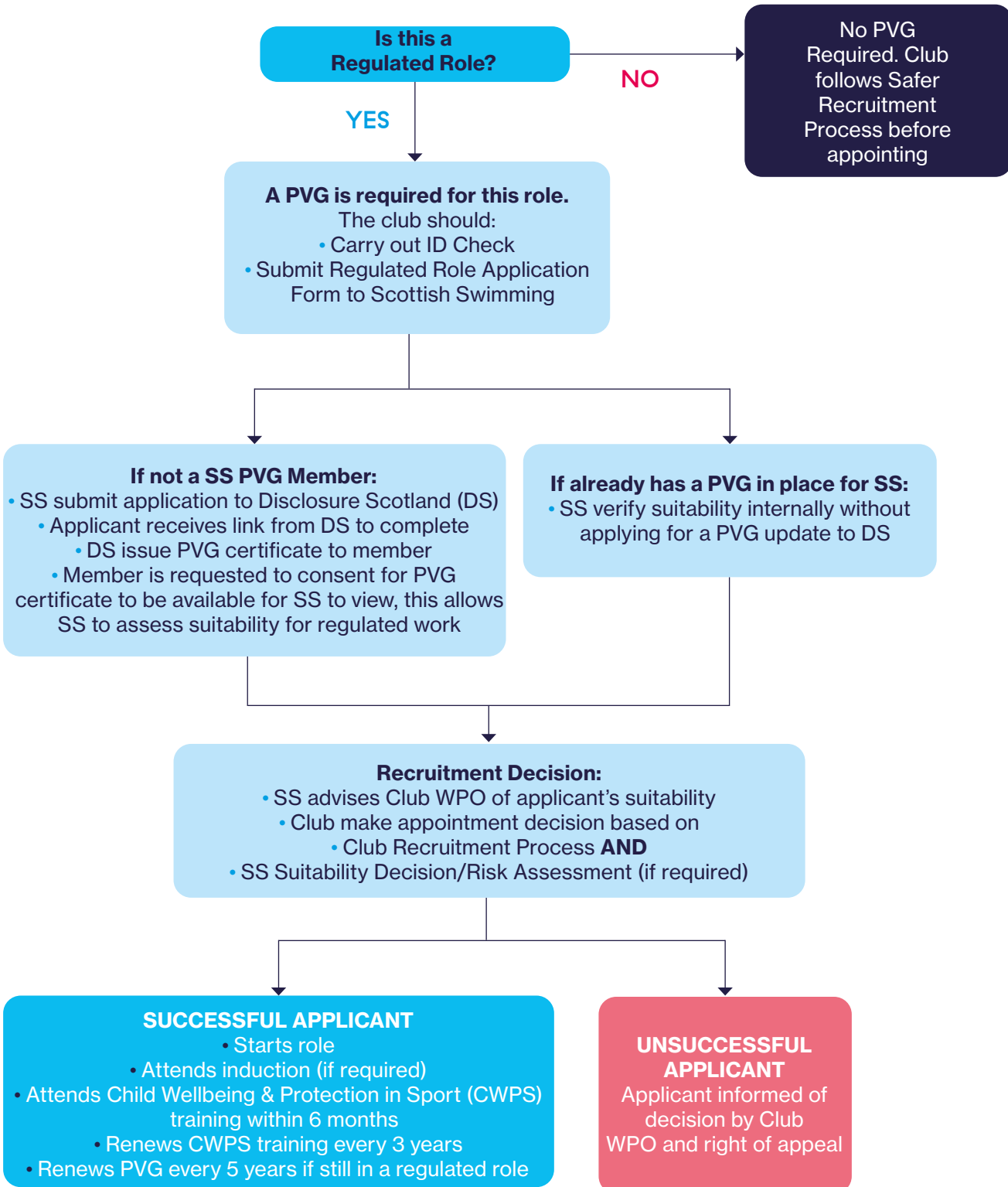
#### CLUB SAFER RECRUITMENT PROCESS

This process applies to all new members to a club, including those already volunteering for other affiliated clubs.



**THE PVG AND SUITABILITY DECISION PROCESS**

The suitability decision making process applies to all PVG checks carried out.  
More information can be found in Safeguarding appendix SR12.



## 13.0 Regulated Roles within Scottish Swimming

Scottish Swimming and clubs must follow the Safer Recruitment Process for all appointments. Part of the Safer Recruitment process is the undertaking of PVG checks for those who wish to work paid or unpaid with vulnerable groups.

The information from the PVG application is used by Scottish Swimming to determine the Suitability Decision for a person's appointment to a Regulated Role. Scottish Swimming must take all reasonable steps to ensure that we provide safe sport for all by ensuring that all staff and volunteers have been through appropriate checks before taking on a role within aquatics. Scottish Swimming is enrolled with Disclosure Scotland for the purpose of accessing PVG disclosure records. PVGs are only a part of the full Safer Recruitment Process.

### 13.1 Regulated Work Definition (Disclosure Scotland)

With the Disclosure (Scotland) Act 2020 taking effect from the 1st April 2025 a number of changes to regulated work has taken place. Regulated work is now regulated roles. Whether a role has power and influence over the activities or decisions that affect the activities of children and young people and/or have position of responsibility and/or have a position that influences the health and safety of activities that affect children and young people, may now be classed as a regulated role.

- It can be a paid or volunteer role
- It must be with children and young people (those U18)
- It has to be part of normal duties i.e. the activity is reasonably anticipated and could appear on the person's job description
- The activity has to be targeted at children; e.g. where an adult section/team has one or two under 18s in attendance; this is termed 'incidental' and does not constitute regulated work

The role must include at least one of the following to be classed as regulated:

- be in a position of power and influence
- be in a position of responsibility
- provide decisions on children's activities relating to health and safety
- caring for children and young people
- teaching, instructing, training or supervising young people
- being in sole charge of children and young people
- having unsupervised access to children and young people
- being a host parent

The Scottish Swimming Safeguarding Team have reviewed all of the main club coaching, officiating, committee and volunteer roles that are regularly found in clubs. There may be other roles that the club has that aren't contained on the list detailed in 13.2. if this is the case then the Club WPO should contact the Scottish Swimming Safeguarding Team for support and advice.

**There is a legal responsibility for those undertaking a regulated role to ensure they have a suitable PVG to cover their activity. There is also a legal responsibility on the club/organisation to ensure that anyone they employ/deploy in a regulated role has a suitable PVG check in place.**

## 13.0 Regulated Roles within Scottish Swimming (continued)

### 13.2 Roles That Require a PVG

The following positions have been agreed with Disclosure Scotland as regulatory positions, therefore require a PVG for a club **before** carrying out the role. If a member already has a PVG with another club, the club still should apply to Scottish Swimming through the regulated roles application form and the Scottish Swimming Safeguarding Team will confirm suitability for the role:

General Club Regulated Roles				
Chair/President	Charity Trustee	Secretary	Meet Director	Wellbeing & Protection Officer
Vice President	Treasurer	Entries Secretary	Team Manager	Chaperone
Club Development Coordinator	Driver	Host Parent	Lifeguard	Mentor
Coach Liaison Officer	Fundraising & Sponsorship Coordinator	Inclusion Officer	Media & Website Coordinator	Technical Official Coordinator
Club Coaching Roles				
Head Coach / Coach	Assistant Coach	Swimming Teacher	Land Trainer	Poolside Helper
Technical Official Regulated Roles				
All Sports	Diving	Water Polo	Artistic Swimming	Open Water
Judge 1, 2, 2S & 3 Marshall Referee	Assistant Referee	Delegate	Assistant Referee Senior Assessor Difficulty & Synchronisation Technical Controller	Medical Officer Rescue Boat Crew Member Safety Officer Safety Representative

### 13.3 Removal of Interest

It is important that all clubs keep Scottish Swimming informed when individuals who are in regulated roles within clubs leave their role/club. A removal of interest form needs to be completed and submitted to Scottish Swimming who in turn will inform Disclosure Scotland and the specific PVG will be cancelled. This will ensure that Disclosure Scotland avoids sharing disclosure content with the club/ Scottish Swimming for an individual that is no longer part of the club or carrying out a regulated role. Please be aware when you remove a person from the PVG scheme, should you wish to use them again in the future they will have to go back through the PVG process.

### 13.4 Volunteers under 16

For young volunteers in a regulated role, once they turn 16, they must have a PVG in place to continue carrying out a regulated role. Minimum age a PVG check can be processed is now 16. Scottish Swimming cannot process any PVG applications for young volunteers under the age of 16. Those under the age of 16, should not be carrying out an unsupervised regulated role. **All volunteers under 18 must be supervised.** More information can be found in Safeguarding Guidance Appendix SG18.

# 14.0 Safeguarding Compliance Measures & Sanctions

In order for Scottish Swimming to ensure a high standard of compliance with regards to PVG checking and CWPS training for those in a regulated role, the Scottish Swimming Board approved the introduction of a range of compliance measures and sanctions for clubs with children & young people to ensure members comply with the PVG legislation requirements and the safeguarding training requirements for specific roles.

The sanctions and compliance information is detailed in the following table:

Minimum Requirement		Sanction if requirement not in place	
<b>Wellbeing &amp; Protection Officer</b>	<b>Appointment</b>	All clubs shall appoint a WPO and register them with SS within 1 month of the previous WPO leaving or a new club affiliating	Club is unable to carry out club activities, club is suspended until compliant
	<b>PVG Check</b>	PVG required to be in place before taking up the role	If no WPO at the club has a PVG in place - club is unable to carry out club activities, club is suspended until compliant
	<b>Safeguarding Training</b>	Complete both required training workshops (CWPS & CWPO) within 6 months of taking up the WPO role	If no WPO at the club has the training in place - club is unable to carry out club activities, club is suspended until compliant
<b>Coaches &amp; Team Managers</b>	<b>PVG Check</b>	PVG in place before they actively take up their coaching/team manager role	Member suspended from the role (of a coach/team manager) and unable to coach/team manage until PVG is in place, but can volunteer in an unregulated role.
	<b>CWPS Training</b>	Active CWPS training in place within 6 months, with intermediary sanctions at 3 months	No CWPS training within 3 months – Coach/Team Manager is unable to access: <ul style="list-style-type: none"> <li>National (&amp; District) event poolside passes</li> <li>National Squad Programme training opportunities</li> <li>SS Connect and other Learning &amp; Development opportunities</li> </ul> No CWPS training within 6 months: <ul style="list-style-type: none"> <li>Member suspended from the role (of a coach) and unable to coach/Team manage until CWPS is in place, but can volunteer in an unregulated role</li> </ul>
	<b>Event Passes</b>	For all National Events a poolside pass is required for all Coaches, Team Managers and Technical Officials (as required). To qualify for a pass individuals must have a PVG, CWPS and Membership	No access to the poolside or other athlete areas at the event.

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## 14.0 Safeguarding Compliance Measures & Sanctions (continued)

Minimum Requirement		Sanction if requirement not in place	
All other regulated roles	PVG Check	All regulated roles within a club must have a PVG in place before they actively take up their volunteering role. Technical Officials undertaking training to become a regulated role need to have a PVG in place by the point of qualification.	Member suspended from the regulated role and unable to volunteer in that role until PVG is in place, but can volunteer in an unregulated role
	CWPS Training	Active CWPS training in place within 6 months	Member suspended from the regulated role until CWPS is in place, but can volunteer in an unregulated role
All Regulated roles (Renewals)	PVG Renewal	Everyone in a regulated role is required to have a valid PVG at all times when carrying out the role and shall renew their PVG every 5 years.	Member suspended from the regulated role and unable to volunteer in that role until PVG renewal is in place, but can volunteer in an unregulated role
	Safeguarding Training Renewal	Everyone in a regulated role is required to have active CWPS training at all times when carrying out the role and shall renew their CWPS training every 3 years	Member suspended from the regulated role until CWPS renewal is in place, but can volunteer in an unregulated role
	Membership	Everyone in a regulated role is required to have a current SASA membership in place	Individual suspended from the regulated role until membership is in place. Individual shall not volunteer in an unregulated role.
Club Compliance & Non-Compliance	Regulated Roles Requirements	Every club is required to ensure that no member once suspended from a regulated role for non-compliance or does not have membership, is actively still carrying out any regulated role	Club is unable to carry out club activities, club is suspended until compliant and insurance policy is invalidated
	Safer Recruitment Contracts	PVG Processing Contract and ID checker Contract in place	Club is unable to carry out club activities, club is suspended until compliant and insurance policy is invalidated

There are several reports that WPOs can access through the JustGo membership system which will allow WPOs and clubs to monitor who is compliant and who requires action to become compliant with the above criteria. Guides to generating the reports can be found on the **Scottish Swimming Website**.

### 14.1 Event Passes

For all National events across the aquatics sports, from the 1st December 2025, all team staff including Coaches, Team Managers and Chaperones along with all Technical Officials and Event Staff who are in a regulated role must apply for and have been issued an event pass by Scottish Swimming, through the JustGo membership system to be able to access field of play and athlete areas at events.

From the 1st February 2026 this will also apply to all SASA District events across all aquatic sports. Anyone in a regulated role without an event pass after these dates, will not be able to volunteer until a pass has been issued. Passes will be valid for one year only and will need to be reapplied for. The event passes will expire during the year if membership is not renewed, PVG or CWPS expire without renewal being completed.

# 15.0 Safeguarding Children and Young People Definitions

## 15.1 Wellbeing Concerns Definition:

A wellbeing concern is if a child's wellbeing (measured using the eight SHANARRI indicators: safe, healthy, achieving, nurtured, active, respected, responsible and included), is, or is at risk of, being adversely affected in any matter. More information can be found in Safeguarding Guidance Appendix SG32.

A wellbeing concern may be identified by the child, or by anyone who knows or supports the child and can be identified for many reasons, such as (but not limited to) the following:

- A child may be worried, anxious or upset about an event/set of circumstances, including socio-economic circumstances
- A coach/parent/carer or family member may have noticed a change in the child's behaviour, demeanour or developmental progress
- A coach/parent/carer may have concerns about the impact on the child of an event or set of circumstances

Or can be identified using the SHANARRI indicators for example:

### Healthy

The child has started to self-harm, is depressed or shows other signs of poor physical or mental health

### Achieving

The child has struggled to master and develop skills at training that are normal for that age and stage of child

### Included

A child who is being excluded or bullied

## 15.2 Negative Discrimination (including racism)

Children and young people may experience harassment or negative discrimination because of their race or ethnic origin, socio-economic status, culture, age, sex, disability, gender reassignment, sexuality or religious beliefs. Although not in itself a category of abuse, it may be necessary for the purposes of this Safeguarding Policy for negative discriminatory behaviour to be categorised as a wellbeing concern and in serious cases emotional abuse.

## 15.3 Abuse of Position of Trust

A relationship of trust can be described as one in which one party is in a position of power or influence over another by virtue of their position – such as a coach, staff member, club official or other appointed volunteer. A genuine social relationship can start between two people within a relationship of trust, however it is important to recognise that relationships where an unequal power dynamic exists can become exploitative and lead to abuse. The coaches and teachers code of conduct clearly states that individuals should not seek out or start personal/sexual relationships with Athletes U18. More information can be found in Safeguarding Guidance Appendix SG19.

## 15.0 Safeguarding Children and Young People Definitions (continued)

### 15.4 Abuse of Trust

Abusive practice is where a person is indoctrinated with attitudes to training, drugs and cheating, or social, political and religious views (radicalisation) which are unacceptable to the community or rules of the sport or uses the position of trust to develop an improper personal relationship with the athlete e.g. to groom them for sexual activity. More information can be found in Safeguarding Appendix SG19.

### 15.5 Poor Practice Definition

Poor practice includes any behaviour that contravenes this Safeguarding Policy or accompanying guidance, any behaviour that does not respect children's rights or those of their parents/carers. Poor practice is behaviour that falls short of abuse but has a negative and adverse effect on the wellbeing of children and is considered unacceptable.

The following definitions set out common areas within sport where poor practice can occur:

- Breaches of the Scottish Swimming/club's Safeguarding Policy and procedures
- Breaches of recognised best practice in coaching
- Practice that may be carried out with the best intentions but fall into a category of behaviours that are used by people who sexually abuse or 'groom' children/ young people

### 15.6 Child Abuse Definition

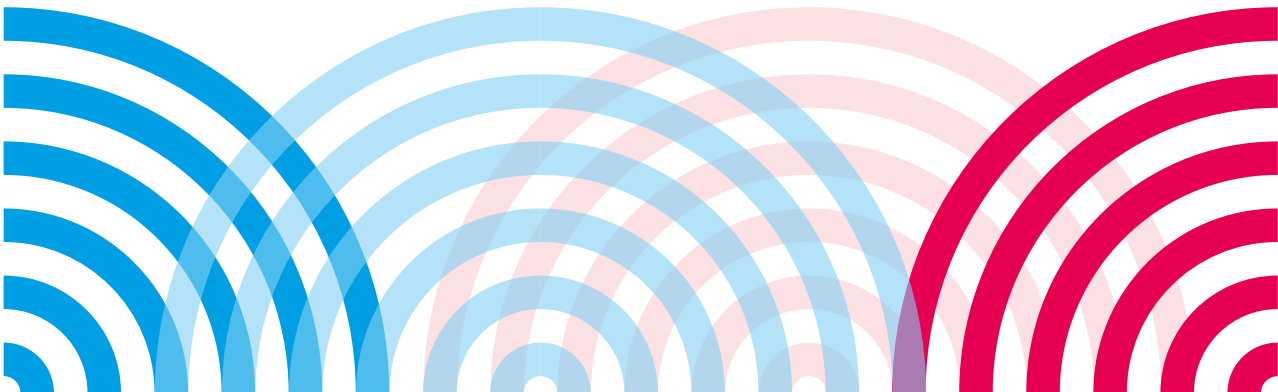
Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting, or by failing to act to prevent, significant harm to the child. Children may be abused in a family or in an institutional setting, by those known to them or, more rarely, by a stranger. This definition includes placing children at risk through something a person has done to them or something a person is failing to do for them and is split into 4 categories of abuse:

Neglect

Physical Abuse

Sexual Abuse

Emotional Abuse



## 16.0 Definitions of Abuse

Everyone involved in sport has a responsibility to be able to recognise and respond to signs and indicators of abuse and malpractice. In particular, each WPO should be aware of the definitions of abuse and must ensure individuals who hold a position of trust within the organisation are familiar with this information.

### What is abuse and maltreatment of children?

All incidents of abuse and neglect are forms of maltreatment of a child. Abuse is any action by another person that causes significant harm to a child or when someone fails to prevent harm to a child.

Who could abuse a child?

- A member of the child's family, a stranger, an acquaintance, or an institution
- A fellow Member or a coach/teacher
- An adult or a child
- Peer on peer abuse
- Anyone else

### The effects of abuse

- Abuse that is allowed to continue can be extremely damaging and can, if not responded to appropriately, cause problems for the person into adulthood
- Present and future relationships can be affected, as can trust in others
- In some cases, abused children have become involved in drugs, alcohol abuse, criminality, suicide and, in extreme cases, they may go on to abuse other children

## 16.1 Types of abuse

### 16.1.1 Physical abuse

Physical abuse happens when a child is deliberately hurt. This can cause injuries such as cuts, bruises, burns and broken bones. It can involve hitting, kicking, shaking, throwing, poisoning, burning or scalding, drowning or suffocating. Physical abuse may also be caused when a parent/guardian, carer or other adult fabricates the symptoms of, or deliberately induces, illness in a child. An example of physical abuse may be the imposed use of performance enhancing drugs or persistent training, which is beyond the capacity of the individual leading to physical harm.

### 16.1.2 Emotional abuse

Also referred to as psychological abuse, it is the ongoing emotional maltreatment of a child. Emotional abuse is persistent and, over time, it severely damages a child's emotional health and development. It may include:

- Making children feel that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Withholding opportunities for the Young Person to express their views, deliberately silencing them or making fun of what they say or how they communicate
- Imposing inappropriate age or developmental expectations on children – for example, interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- A child seeing or hearing the ill-treatment of another
- Bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

In a sporting context, emotional abuse could include, but is not limited to, a coach who continuously criticises, uses sarcasm and/or name calling or who generally belittles the child. Parents/guardians can emotionally abuse a child by having excessively high expectations which places unrealistic pressure on the child, or by constantly giving the child negative feedback.

## 16.0 Definitions of Abuse (continued)

### 16.1.3 Sexual abuse

Sexual abuse can include, but is not limited to, forcing or enticing a child to take part in sexual activities. It doesn't necessarily involve violence and the child may not be aware that what is happening is abuse. There are two different types of child sexual abuse. These are called contact abuse and non-contact abuse.

Contact abuse happens when the abuser makes physical contact with the child. It includes:

- sexual touching of any part of the body, whether the child is wearing clothes or not
- rape or penetration by putting an object or body part inside a child's mouth, vagina or anus
- forcing or encouraging a child to take part in sexual activity and making a child take their clothes off, touch someone else's genitals or masturbate.

Non-contact abuse involves non-touching activities. It can happen online or in person. It includes:

- encouraging a child to watch or hear sexual acts
- not taking proper measures to prevent a child being exposed to sexual activities by others;
- showing pornography to a child
- making, viewing or distributing child abuse images (this can include taking images of a child when they are getting changed in the changing rooms)
- allowing someone else to make, view or distribute child abuse images
- meeting a child following face-to-face or online sexual grooming, with the intent of abusing them
- sexually exploiting a child for money, power or status (child exploitation)
- persuading or forcing a child to send or post sexually explicit images of themselves. This is sometimes referred to as 'sexting'
- persuading or forcing a child to take part in sexual activities via a webcam or smartphone and having sexual conversations with a child by text or online.

Abusers may threaten to send sexually explicit images, video or copies of sexual conversations to the child's friends and family unless they take part in other sexual activity. Images or videos may continue to be shared long after the abuse has stopped.

### 16.1.4 Neglect

Neglect is a persistent failure to meet a child's basic physical and/or psychological needs usually resulting in serious damage to their health and development. Neglect may involve failure to:

- provide adequate food, clothing and shelter
- protect a child from physical and/or emotional harm or danger
- ensure adequate supervision (including leaving them with unsuitable carers)
- ensure access to appropriate medical care or treatment
- make sure the child receives a suitable education
- meet or respond to a child's basic emotional needs

An example of neglect could be that a coach or officer fails to ensure the safety of a child by exposing them to undue cold or to unnecessary risk or injury. Neglect often highlights a failure to fulfil a duty of care.

### 16.1.5 Bullying

Bullying is defined by the Anti-Bullying Alliance as: "The repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online." It can cause considerable distress to children, to the extent that it affects their health and development or, in extreme cases, causes them significant harm (including self-harm). Children who suffer from bullying may often bully others in turn.

## 16.0 Definitions of Abuse (continued)

### 16.1.5 Bullying (continued)

Bullying can take a variety of forms, and often multiple forms simultaneously:

- Verbal: name calling, persistent teasing, mocking, taunting and threats
- Physical: any degree of physical violence including hitting, kicking and pushing. Intimidating behaviour, theft or the intentional damage of possessions
- Emotional: excluding, tormenting, ridiculing, humiliation, setting people up and spreading rumours
- Cyber: the misuse of digital technologies or communications to bully a person or a group, typically through messages or actions that are threatening and/or intended to cause offence, anxiety or humiliation
- Racist: bullying based on ethnicity, skin colour, and language, religious or cultural practices
- Homophobic and transphobic: bullying based on sexuality or gender identity
- Disablist: bullying children who have special educational needs and disabilities
- Sexual: unwelcome sexual advances, comments that intended to cause offence, humiliation or intimidation
- Discriminative: bullying based on any perceived weakness or difference. This could be because of their gender, age, race, nationality, ethnic origin, religion or belief, sexual orientation, gender reassignment, disability or ability. It could also be factors surrounding the way someone looks or the clothes they wear, their family and social situation, hobbies and interests

Bullying can occur between:

An adult and child

Children (peer on peer)

A parent/guardian and their own child

The competitive nature of sport can create an environment which provides opportunities for bullying. Examples of bullying in our sports could be:

- a parent/guardian who pushes their child too hard
- a coach who adopts a win-at-all-costs philosophy
- a member who intimidates others inappropriately
- an official who places unfair pressure on a person

Bullying in our sports could include a child being ostracised by others in their lane, squad or age group, refusing to talk to them and/or encouraging others to treat them with contempt.

### 16.1.6 Harassment

Harassment is a criminal offence, and can be when someone repeatedly behaves in a way that makes you feel scared, distressed or threatened. The National Website for Policing says that harassment may include:

- bullying
- cyber stalking (using the internet to harass someone)
- antisocial behaviour
- sending abusive text messages
- sending unwanted gifts
- unwanted phone calls, letters, emails or visits

It's harassment if the unwanted behaviour has happened more than once. Sexual harassment is also unlawful, as a form of discrimination, under the Equality Act 2010. The Act says it's sexual harassment if the unwanted behaviour violates the individual's dignity; or creates an intimidating, hostile, degrading, humiliating or offensive environment (this includes the digital environment, online).

Some examples of sexual harassment could include:

- sexual comments, jokes or gestures
- staring or leering at your body
- using derogatory names
- unwanted sexual communications, such as emails, texts or direct messages
- sharing sexual photos or videos
- groping and touching
- someone exposing themselves
- pressuring you to do sexual things or offering you something in exchange for sex

Some of these are also forms of sexual or indecent assault. Harassment should be reported to the Police, and referred to the Scottish Swimming Safeguarding Team.

## 16.0 Definitions of Abuse (continued)

### 16.1.7 Grooming

The National Society for the Prevention of Cruelty to Children (NSPCC) define grooming as “when someone builds a relationship, trust and emotional connection with a child or young person so they can manipulate, exploit and abuse them. Children and young people who are groomed can be sexually abused, exploited or trafficked”.

It is a criminal offence to cause or incite a child under 16 years old to engage in sexual activity. This can occur where a communication with a child causes or incites some kind of sexual activity by the child e.g. naked or semi-naked posing. It is also a crime for a person aged 18 or over to communicate with a child under 16 years old (who the adult does not reasonably believe to be 16 years old or over), if the communication is sexual or if it is intended to obtain from the child a communication which is sexual.

Children can be groomed face to face or online, by a stranger or by someone they know. Groomers can identify as any gender and could be any age. They will hide their true intentions and may spend months or years gaining a child’s trust and, in some cases, the trust of the child’s family to allow them to be left alone with a child. Those who work with children may use similar tactics to gain the trust of the child and their colleagues.

### 16.1.8 Extremism

Extremism goes beyond terrorism and includes people who target the vulnerable (including young people) by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

### 16.1.9 Child sexual exploitation

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity

- in exchange for something the victim needs or wants, and/or
- for the financial advantage or increased status of the perpetrator or facilitator

The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

### 16.1.10 Child-on-child abuse

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (sometimes known as ‘teenage relationship abuse’)
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

### 16.1.11 Female Genital Mutilation (FGM)

FGM is when a female’s genitals are deliberately altered or removed for non- medical reasons. It’s also known as ‘female circumcision’ or ‘cutting’, but has many other names. FGM is a form of child abuse. It’s dangerous and a criminal offence in the UK.

## 16.⊙ Definitions of Abuse (continued)

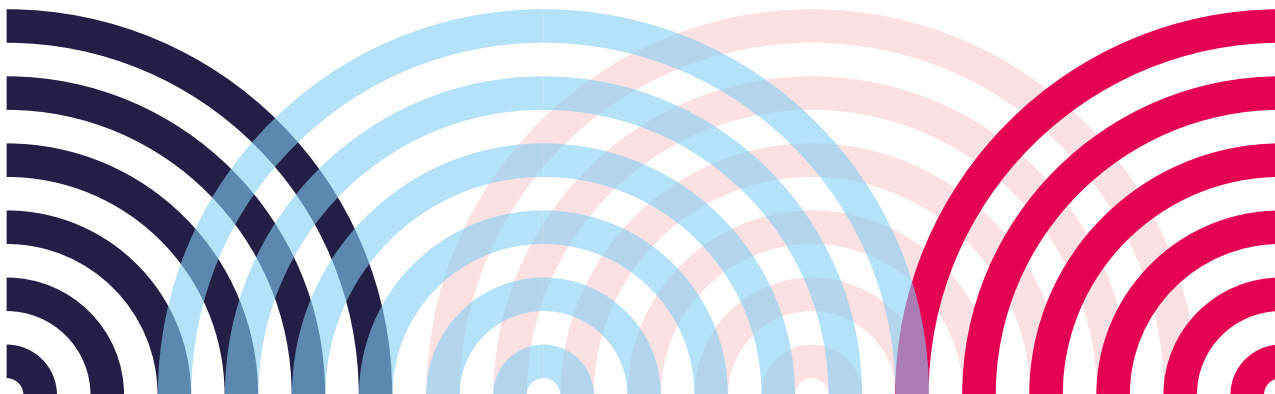
### 16.1.12 Self-Harming

Self-harm can take lots of physical forms, including cutting, burning, bruising, scratching, hairpulling, poisoning and overdosing. There are many reasons why children and young people try to hurt themselves. Often once they start, it can become a compulsion. That's why it's so important to spot it as soon as possible and do everything possible to help. Self-harm isn't usually a suicide attempt or a cry for attention. Instead, it's often a way for young people to release overwhelming emotions. It's a way of coping. Whatever the reason, it should be taken seriously.

### 16.1.13 Sextortion

Sextortion is a financial cyber-crime that exploits a young person's trust and seeks to control them through the threat of public humiliation by releasing or threatening to release nude or semi-nude images to the public. After the explicit imagery is captured by the sexual predator, it is used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. **Images can be both real or generated by AI.** It can happen to anyone, although the National Crime Agency has reported that while sextortion is prevalent amongst all age groups and genders, **males between 14–18 are more likely to become victims of this crime.**

Typically, sextortion begins when a criminal pretending to be a child or young person connects to and strikes up a friendship or relationship with a young person online. Initially, this will appear entirely innocent as they bond over shared interests. A young person may meet someone on a social media platform, a dating app, or even a gaming platform such as Roblox. Soon, the interactions take an unexpected turn towards sexual topics, initiated by the other person. The young person is encouraged to share explicit photos or engage in intimate acts on camera, not realising the digital trap being set. The perpetrator captures and saves these intimate images to use as leverage to manipulate and control the young person. More information can be found in Safeguarding Guidance Appendix SG26.



# 17.0 Identifying Child Abuse

## 17.1 Indicators of potential abuse

There are many indicators that a child may be suffering abuse, some general signs are included in the following list.

Please note that this list is not exhaustive:

- Unexplained or suspicious injuries such as bruising, cuts or burns, particularly if situated on a part of the body not normally prone to such injuries
- An injury for which the explanation seems inconsistent
- Someone else (a child or adult) expresses concern about the wellbeing of another child
- Unexplained changes in the behaviour (e.g. becoming very quiet, withdrawn or displaying sudden outbursts of temper)
- Inappropriate sexual awareness or behaving in a sexually implicit way
- Distrust of adults, particularly those with whom a close relationship would normally be expected and seems to have difficulty in making friends
- Displays variations in eating patterns including overeating or loss of appetite
- Refusal to remove clothing for normal activities or keeping covered up in warm weather
- Becomes increasingly dirty or unkempt or loses/gains weight for no apparent reason

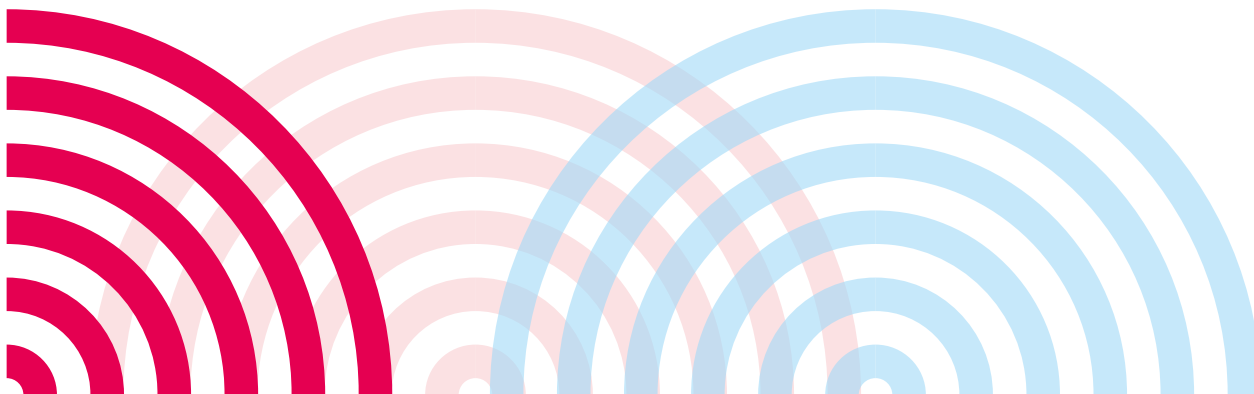
The presence of one or more of the indicators is not proof that abuse is actually taking place. It is not the responsibility of those working in sport to decide that child abuse is occurring but it is their responsibility to act on any concerns by reporting them via the appropriate channels.

## 17.2 Children & Young People Who Are Deaf, Disabled or Have a Learning Disability

Research, including “It doesn’t happen to disabled children” Child Protection and Disabled Children, NSPCC (2003), tells us that children and young people who have a learning or physical disability are more vulnerable to abuse. This is because:

- They are often dependent on a number of people for care and handling, some of which can be of an intimate nature
- They may be unable to understand the inappropriateness of the actions or unable to communicate to others that something is wrong
- Signs of abuse can be misinterpreted as a symptom of the disability
- Like other children, they are fearful of the consequences of disclosing abuse
- Attitudes and assumptions that children with disabilities are not abused
- They may be unable to resist abuse due to physical impairment
- Of negative attitudes towards children with disabilities

Volunteers/staff should be aware of the additional vulnerabilities that may affect deaf and disabled children and be mindful of this when working with them. More information is available in Safeguarding Guidance Appendix SG2.



## 18.🕒 Safeguarding in Changing Rooms

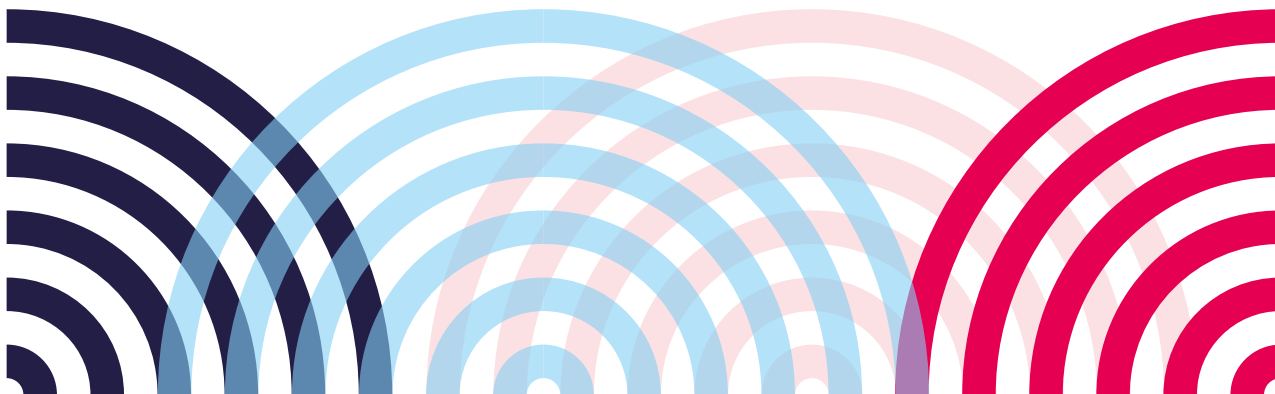
Unfortunately, incidents involving the taking of indecent images still occurs in changing rooms areas. It is imperative all members of the Club, including athletes, staff and volunteers, understand the individually harmful and legal consequences of a person being sexually assaulted, or having indecent images of them taken. Such behaviour is illegal and will not be tolerated in any form.

**Mobile phones and devices should not be used under any circumstances in a changing room area, toilet or shower area during Scottish Swimming regulated activity.** This should be supported by clear signage in changing rooms confirming a zero-tolerance approach to the use of mobile phones in changing areas. Mobile phones should be kept securely in pockets, bags or lockers when in these areas and should not be used for any purpose.

Where a mobile phone or electronic device has been used in this area and has been suspected that an image or video has been taken or attempted to be taken, this must be reported to the venue and the Club WPO straight away. The police should be informed by the club WPO or the facility manager if involved.

All misuse of mobile devices in a changing room, toilet or shower area must be reported to the club's WPO and venue as quickly as possible. The WPO should decide whether or not the behaviour being reported is a safeguarding concern (such as the reported taking of images/video, or the placing of a phone over/under a changing cubicle) and if so, this must be referred to the Scottish Swimming Safeguarding Team as soon as possible. If the breach of this policy is not deemed to be a direct safeguarding concern (such as a member using their phone to make a phone call in a changing area) then this should be dealt with under the club's behaviour and code of conduct process.

Information regarding photography can be found in Safeguarding Guidance Appendix SG22 and Information regarding Changing Room Management can be found in Safeguarding Guidance Appendix SG6. Any incidents requiring to be notified to the Scottish Swimming Safeguarding Team as a result of poor behaviour in changing room spaces should be submitted to **safesport@scottishswimming.com** or be contacting the Safeguarding Manager directly. Incidents should be notified to Scottish Swimming within 48 hours of the incident occurring but where there is Police involvement or for potential for Police involvement then Scottish Swimming should be informed as soon as possible.



## 19.0 Managing Bullying

Scottish Swimming is committed to providing a caring, friendly and safe environment for all our members so they can participate in a relaxed and secure atmosphere. Bullying of any kind is unacceptable within our sports.

### What is bullying behaviour?

The Anti-Bullying Alliance defines bullying as “the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. Bullying can be physical, verbal or psychological. It can happen face-to-face or online”.

Bullying can include (but not limited to):

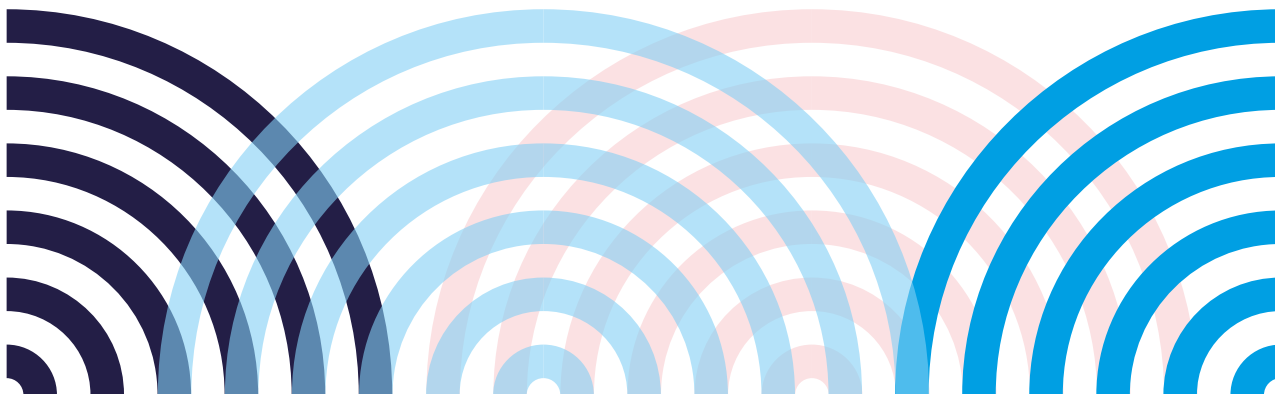
- Verbal: name calling, persistent teasing, mocking, taunting and threats
- Physical: any degree of physical violence including hitting, kicking and pushing
- Intimidating behaviour, theft or the intentional damage of possessions
- Emotional: excluding, tormenting, ridiculing, humiliation, setting people up and spreading rumours
- Cyber: the misuse of digital technologies or communications to bully a person or a group, typically through messages or actions that are threatening and/or intended to cause offence, anxiety or humiliation
- ‘Banter’: can include any of the above types of bullying in a way that may not be intended to cause harm to someone, but doesn’t account for the impact such behaviour can have on an individual

### Procedures

Children & Young People should report all bullying incidents to an adult at their club. That adult must then inform the club WPO. Every Scottish Swimming club is required to have an anti-bullying policy in place to support their members. The WPO and the club will decide the appropriate method for dealing with the situation, either as a breach of code of conduct, or as a wellbeing complaint. Support is available from the Scottish Swimming Safeguarding Team. Incident forms including details of the case situation and conclusion must be submitted to [safesport@scottishswimming.com](mailto:safesport@scottishswimming.com). Any serious or aggravating factors around bullying can be referred directly to the Scottish Swimming Safeguarding Team in the first instance.

### Prevention

Everyone within the club has a responsibility to work together to stop bullying. It is mandatory for all clubs to adhere to the Scottish Swimming code of ethics and accompanying codes of conduct. Template codes of conducts which clubs can adopt and adapt are available on the Scottish Swimming website. All club members must receive and agree to a copy of the relevant code of conduct when they join the club, so they are aware and understand acceptable standards of behaviour. Clubs must promote and implement the codes of conduct and their anti-bullying policy. More information regarding managing and preventing bullying can be found in Safeguarding Guidance Appendix SG28.



## 20.0 Reporting a Concern about a Child or Young Person at Risk of Harm

### 20.1 The Five R's of Safeguarding

The five R's of safeguarding are widely recognised as the stages to effectively manage a wellbeing and protection concern. The following graphic explains each of the stages. WPOs and anyone supporting an individual with the disclosure of a concern should follow these five steps.

#### **R**ecognise

- You must have a clear understanding of the what the different signs and symptoms of potential abuse, harm and neglect can be
- Being able to identify what a concern is, is important in safeguarding young people
- Ensure that you have valid Child Wellbeing & Protection Training in place

#### **R**espond

- If you do have a safeguarding concern, it is essential that you respond appropriately and do not ignore the situation
- Scottish Swimming and clubs have safeguarding policies in place to help you support members when needed
- Make sure you are aware of the steps to take in your club

#### **R**eport

- Safeguarding concerns need to be reported without delay.
- Inform the Club Wellbeing Officer or Scottish Swimming Safeguarding Team or Statutory agency as necessary
- Confidentiality is important, so only share information with those who are part of the safeguarding process

#### **R**ecord

- This is the who, what, why, when and where of safeguarding
- Take precise, comprehensive notes that detail everything about your safeguarding concern. For example, who it involves, what happened, and include times and dates
- Do not delay - you should do this as soon as possible

#### **R**efer

- Referring involves making appropriate arrangements for further support, investigation, or intervention by referring the case to relevant agencies or professionals
- It is usually the responsibility of the Club WPO or Scottish Swimming Safeguarding Team to pass on safeguarding concerns to the appropriate authorities
- However, if the safeguarding risk is more urgent and you suspect somebody is under immediate or severe threat, you should contact the police or social services

## 20.0 Reporting a Concern about a Child or Young Person at Risk of Harm (continued)

### 20.2 Reporting a Concern

All members should be aware of how to report any concerns which they are aware of, however, it is especially important that WPOs are aware of the reporting procedures for any child safeguarding concern. Scottish Swimming is committed to ensuring that any child member who attends a Scottish Swimming affiliated Club, event or activity will be safeguarded from harm. Protection and safeguarding of all of our members is paramount and should be based on prevention and best practice. However, we recognise that not all risks can be removed and safeguarding concerns will continue to be raised both within, and outside of, any Club.

The following three stages of action must be taken for anyone who may have a concern or is made aware of a concern about a child member's wellbeing:

#### Stage 1

Respond to the concern, disclosure, suspicion or allegation in a timely and appropriate manner.

1

#### Stage 2

Record the relevant information.

2

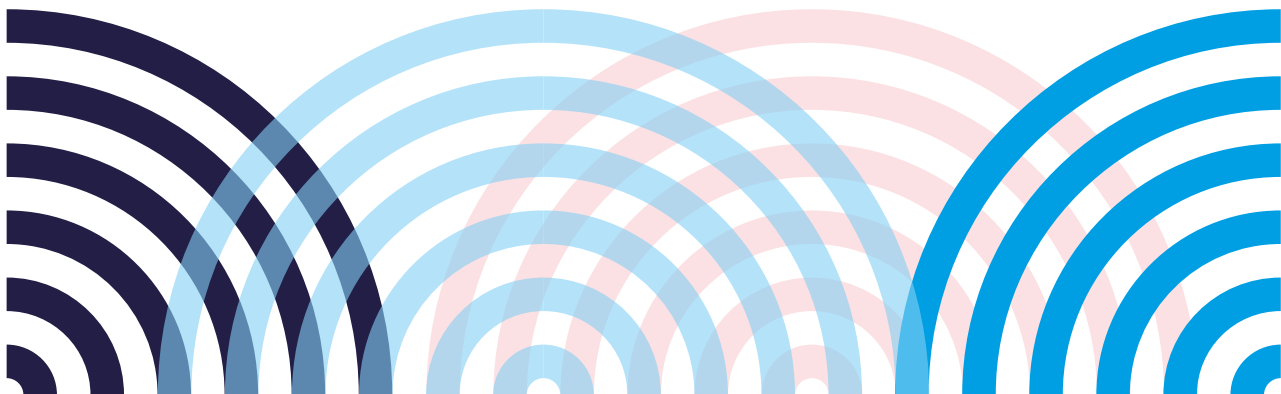
#### Stage 3

Report the information to the appropriate person(s) and/or organisation(s), subject to the above consent conditions being met.

3

You do not have to decide whether a concern or incident amounts to abuse or a failure to safeguard a child member. You do have to refer that concern to the Scottish Swimming Safeguarding Team so they can make that decision. Anyone with a concern relating to members in aquatics can contact the Scottish Swimming Safeguarding Team for advice and guidance.

**If you are experiencing, at risk of, or have experienced harm, or you are concerned that a child member is experiencing, at risk of, or has experienced harm, please contact the Scottish Swimming Safeguarding Team. The team will be able to provide advice even if you are not making a referral or are unsure whether to do so. If there is any uncertainty, please contact the Scottish Swimming Safeguarding Team for advice.**



## 20.0 Reporting a Concern about a Child or Young Person at Risk of Harm (continued)

### 20.3 Responding to Concerns

A complaint, concern or allegation may come from a number of sources: the child, one of their friends, their coach, a parent or someone else within your club. It may involve the behaviour of a volunteer/employee, or something that has happened to the child outside the sport e.g. at home or at school. Children may confide in adults they trust, in a place where they feel safe.

#### Responsibilities

A report/concern may range from mild verbal bullying to physical or sexual abuse. If you are concerned that a child may be being abused, it is **NOT** your responsibility to investigate further **BUT** it is your responsibility to:

- Reassure the person making the report they have done the right thing in raising a concern
- Listen openly without judgment
- Record anything that is said
- Report it to the appropriate statutory authorities and Scottish Swimming

Following set and published procedures when dealing with concerns and discourses helps:

- To avoid those receiving information from engaging in judgements
- Reassure those who report concerns that an appropriate course of action will ensue
- Support those charged with managing concerns by providing them with a step-by-step process to follow
- Safeguard the rights of those against whom complaints or allegations have been made

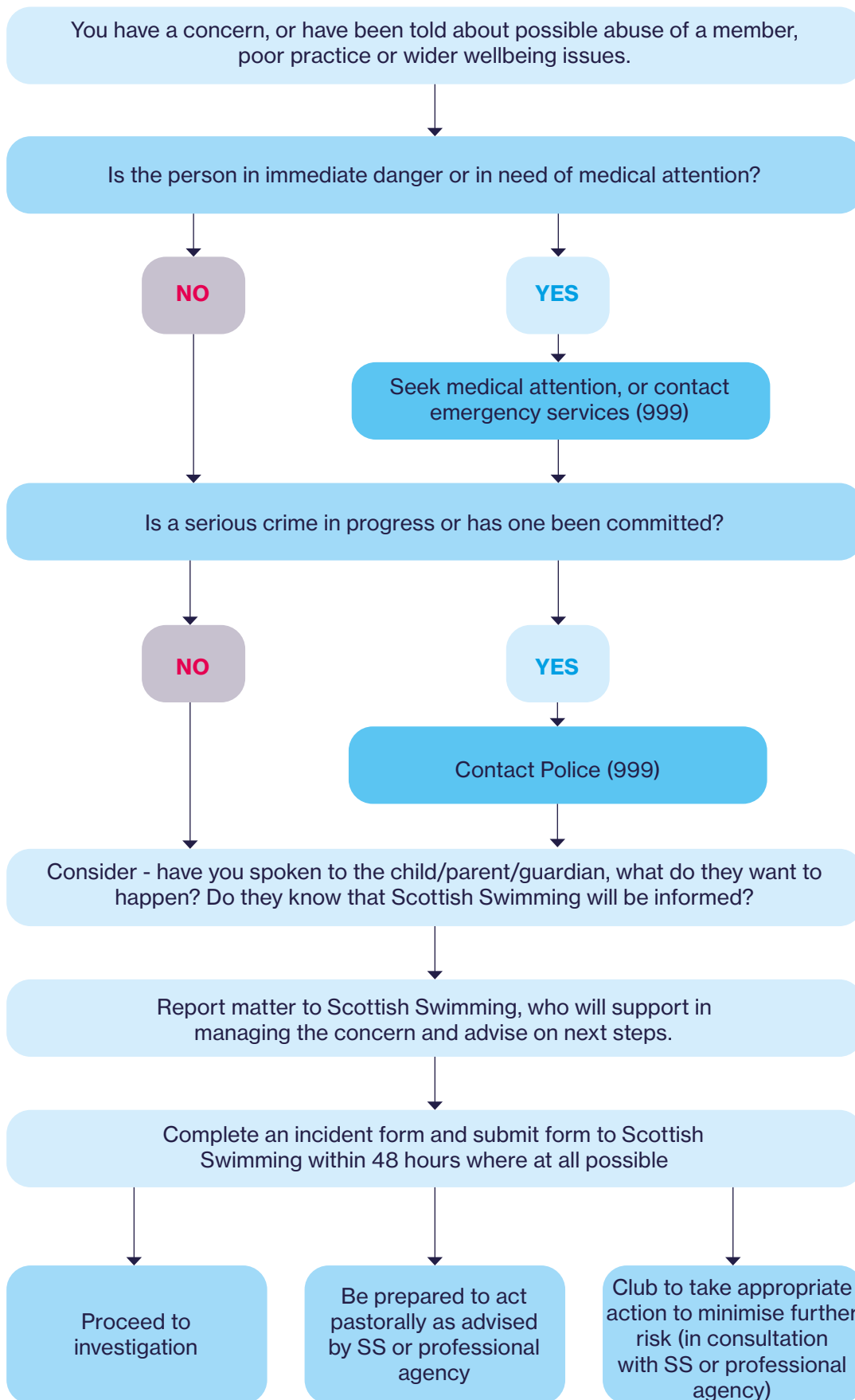
You may be concerned about harm to another person because of something you have seen or heard, information you have been told by others or because someone has confided in you about things that are happening or have happened to them. If you have concerns or you are told about possible or alleged abuse, poor practice or wider welfare issues you must contact your WPO or Scottish Swimming Safeguarding Team as soon as you can.

**You must not keep safeguarding concerns to yourself.**

If you are concerned about harm being caused to someone else, please be aware that:

- It is not your responsibility to prove or decide whether a child member has been harmed or abused
- It is, however, everyone's responsibility to respond to and report concerns they have using the Scottish Swimming Incident Form. **Forms must be submitted to Scottish Swimming Safeguarding Team within 48 hours of the incident**
- If someone has a need for immediate medical attention, you must always call an ambulance on 999
- If you are concerned someone is in immediate danger or a serious crime is being committed, you must contact the Police on 999 straight away
- If appropriate, discuss your concerns with the child's parent/guardian, and seek to understand what they would like to happen. Inform them that you have to pass on your concerns to your WPO or Scottish Swimming Safeguarding and Team
- Do not contact the parent/guardian before talking to your WPO or the Scottish Swimming Safeguarding Team if the person allegedly causing the harm is likely to find out as a result
- Do not confront the person thought to be causing the harm

20.4 Responding to concerns about a child being harmed or at risk of harm



## 20.0 Reporting a Concern about a Child or Young Person at Risk of Harm (continued)

### 20.5 Responding to a Direct Disclosure

It takes considerable courage for a child to disclose abuse. Allegations of abuse must always be taken seriously. The safety of the child is paramount. False allegations are very rare. Disclosures need to be handled sensitively to avoid causing further distress to the child. If a child says or indicates they are being abused or information is obtained which gives concern that a child is being abused the information must be responded to on the same day in line with the following procedure:

If a child discloses to you that they are being harmed or abused, or you are a WPO who receives information which gives rise to concern.

#### You must:

- Treat the disclosure seriously
- Remain calm and be sensitive
- Listen carefully to what is said, allowing the discloser to continue at their own pace
- Keep questions to a minimum, only ask questions if you need to identify or clarify what the person is telling you and do not ask leading questions
- Reassure the person that they have done the right thing in revealing the information
- Be aware of interpreting what a child says, especially if they have learning or physical disabilities which affect their ability to communicate, or English is not their first language
- Ask them what they would like to happen next
- Explain what you would like to do next in response to the concern
- Explain that you will have to share the information with the Scottish Swimming Safeguarding Team
- Act swiftly to report and carry out any required actions if you are a WPO
- Record in writing what was said, using the child's own words, as soon as possible, along with any actions taken or proposed
- Follow Scottish Swimming's wellbeing & protection procedures
- Report the incident to the Scottish Swimming Safeguarding Manager, the WPO or directly to Social Service's team in your Local Authority if necessary

#### You must not:

- Dismiss or ignore the concern
- Make negative comments about the alleged perpetrator
- Make assumptions or speculate
- Rush into actions that may be inappropriate
- Come to your own conclusions
- Probe for more information than is offered
- Make promises that cannot be kept, including that you will keep the disclosure secret when you cannot
- Conduct an investigation of the case yourself
- Confront the person thought to be causing harm
- Take sole responsibility for the concern
- Tell anyone else about the concern who has no need to be made aware of it

You must report all direct disclosures from children or any situation where you have not received a disclosure, but you suspect that a child is at risk or experiencing abuse. Reporting disclosures and concerns ensures that a child receives appropriate help and support, resulting in appropriate action being taken against those who pose a risk to children and will help protect not only the child involved but all other children. Where there is uncertainty about what to do with the information, Scottish Swimming must be consulted for advice on the appropriate course of action.

**If you have any doubt – report it!**  
**If you receive a disclosure – report it!**

## 20.0 Reporting a Concern about a Child or Young Person at Risk of Harm (continued)

### 20.6 Historical Allegations of Abuse

Allegations of abuse may be made some time after the event e.g. an adult who was abused as a child by someone who was (or still is) involved in aquatics.

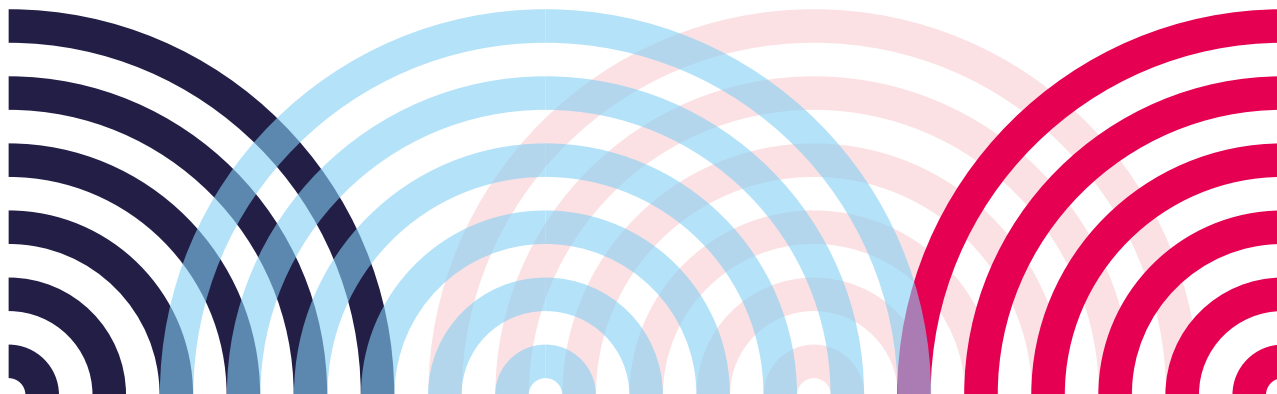
- If somebody raises a child protection concern in relation to a coach/teacher/volunteer who is currently practicing, then you should follow the 'Responding to Concerns' procedure.
- If it is a historical allegation, then you should follow the same 'Responding to Concerns'. Record the information using the Incident Report Form and signpost the individual to Police Scotland on '101'.
- If you have a concern about a child's immediate safety then this should be passed on to Police or Social Services, and after the child has been secured, record and report as normal to Scottish Swimming.

### 20.7 Circumstances where reporting to the club WPO is not possible

- If the club WPO is unavailable or is implicated, talk directly to a senior club officer or go directly to Scottish Swimming's Safeguarding Manager for advice.
- When on an away trip, inform the person who has responsibility for safeguarding. This may be the team manager or head coach.

### 20.8 Involving Parents or Carers

- Scottish Swimming is committed to working in partnership with parents. In most situations, it is important that the club WPO or Scottish Swimming Safeguarding Team involves parents to clarify any initial concerns e.g. if a child seems withdrawn, they may have experienced a recent bereavement.
- Where a parent or carer may be responsible for the abuse or may not be able to respond to the situation appropriately, they should not be involved, as it may place the child at greater risk.



# 21.0 Low-Level Concerns

## 21.1 Definition

A Low-level concern is any concern that an adult has behaved in a way towards a child that:

- Is inconsistent with the club/Scottish Swimming code of conduct while a member of the club regardless of whether they were carrying out a specific role at the time
- Does not meet the threshold of harm or is not considered serious enough for Scottish Swimming/club to take escalated action

Low-level concerns include a spectrum of behaviours which may be intentionally designed to facilitate abuse or be unintentional, inadvertent or thoughtless.

Low-level concerns may take place face to face, in writing, or digitally such as in online meetings, or via social media, text messaging, messaging apps or by email. The important consideration is that the behaviour is inappropriate and not what Scottish Swimming would expect of a member as set out in the code of conducts and Safeguarding Policy.

Examples of Low-level concerns:

- Showing favouritism or being over-friendly
- Using inappropriate language that is intimidating, offensive or of a sexual nature
- Inappropriate touching or initiating hugging, intimidation, punishment or degrading treatment

## 21.2 Threshold

An allegation of harm is where it is alleged that a person who works with children and young people has or may have behaved in a way that meets the harm threshold as specified below:

- Behaved in a way that has harmed or may have harmed a child
- Possibly committed a criminal offence against or related to a child
- Behaved towards a child or children or adult/s at risk in a way that indicates they may pose a risk of harm to children
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

These would be classed as: serious poor practice, misconduct, gross misconduct or criminal behaviour and should be reported to Scottish Swimming through the reporting a concern process. Concerns that do not meet the harm threshold are treated as Low-level concerns.

The term 'Low level' concern does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the harm threshold and is classed as potential poor practice or inappropriate behaviour. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the code of conduct, including inappropriate conduct and does not meet the allegation threshold.

Members when raising a concern, do not need to be able to determine in each case whether their concern is a low-level concern, or more serious, the club WPO will be able to assess the seriousness and take appropriate action. Advice is also available through the Scottish Swimming Safeguarding Team.

More information regarding thresholds is contained in section 20.0.

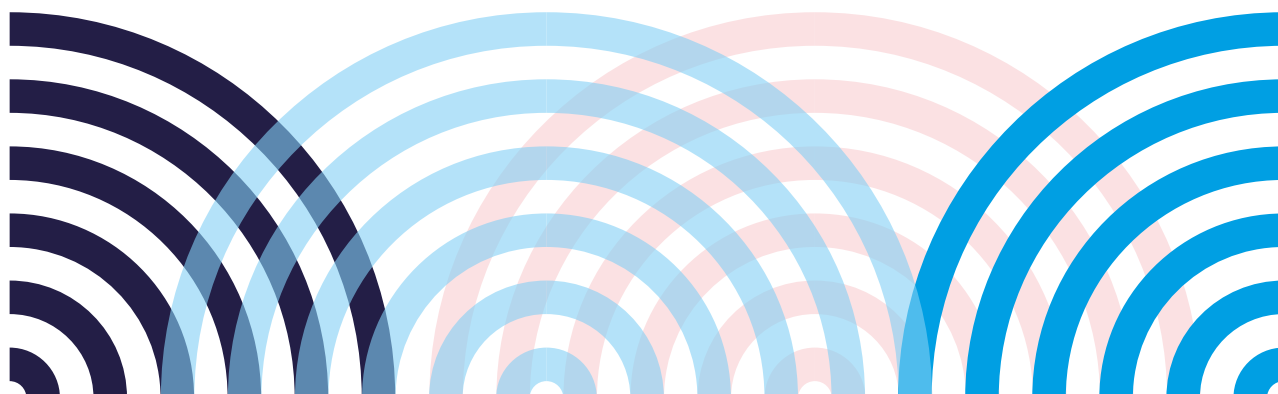
## 21.0 Low-Level Concerns (continued)

### 21.3 Raising Low-level concerns

1. Any Low-level concern must be shared with the club WPO as quickly as practically possible.
2. The WPO will assess the information and will take one of the following actions:
  - a. Record the Low-level concern locally, complete the incident form and submit to Scottish Swimming for filing on Globocol Case Management System (CMS)
  - b. Investigate the matter and decide appropriate disciplinary action to be taken. Record the concern locally, complete the incident form and submit to Scottish Swimming for filing on Globocol CMS
  - c. Club WPO can upload concern information directly to Globocol CMS Club Portal (when available to the club)
  - d. Refer the concern to Scottish Swimming Safeguarding Team for support with managing the concern investigation

### 21.4 Recording Information

All Low-level concerns received/raised with the club WPO must be recorded locally and an incident form containing the relevant details must be submitted to Scottish Swimming for recording centrally using Globocol CMS. The recording nationally will allow tracking of specific members/concerns and supports with safeguarding trends reporting. The recording and storage of concern information must conform to the **secure handling and safeguarding data policies**.



## 22.0 Thresholds for Concern Management

A key part of the case management process is carrying out the initial assessment of the safeguarding risk as it is important to consider how serious the situation is. The following scale and flow chart provides guidance as to how serious a situation is and what level of action is to be required.

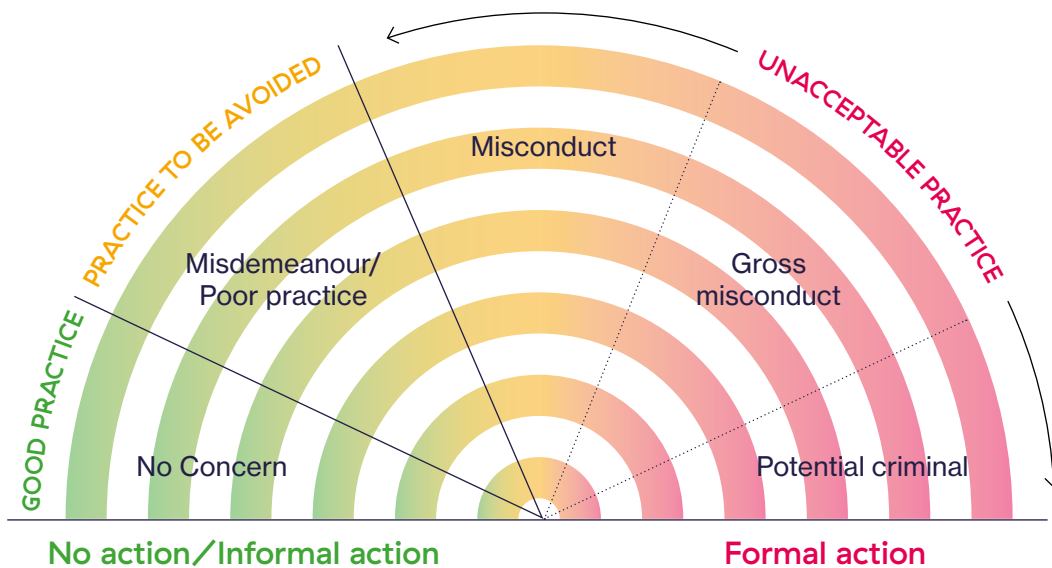
It is essential that clubs have codes of conduct in place to allow everyone to be aware of the standard of behaviour expected within the club. Where the behaviour of a member is considered in breach of the code of conduct then this should be reported to the club WPO.

It is essential for any low-level concerns (LLC) observed to be reported to the club WPO. Scottish Swimming encourages clubs to report and record low-level concerns to enable patterns of behaviour of an individual(s) and identify case trends across the aquatic sports to allow for robust proactive preventative measures to be developed.

In all cases an incident report form along with any supporting information should be sent to the Scottish Swimming Safeguarding Team ([safesport@scottishswimming.com](mailto:safesport@scottishswimming.com)) for recording on the Globocol Case Management System.

### 22.1 Case Management Thresholds:

1. When a club WPO receives a concern that is deemed to be poor practice/inappropriate behaviour or misconduct from a member they are responsible for managing the investigation and conclusion of the case with the support of Scottish Swimming where required
2. When a concern is received that is deemed to be gross misconduct the club WPO should liaise with the Scottish Swimming Safeguarding Team around the management of the case, likely to be led by the club WPO locally but directly supported by the Safeguarding Manager
3. Where a concern involving potential criminal activity is reported to a club WPO, this should be referred to Scottish Swimming immediately and the case will likely be managed by Scottish Swimming with the support of the club WPO
4. Where Scottish Swimming receives a concern of any level that applies to a Scottish Swimming national programme activity or national event activity, Scottish Swimming will manage the case fully, with the relevant club WPO supporting as necessary



## 22.0 Thresholds for Concern Management (continued)

### 22.2 Disciplinary Action

A guide to the appropriate disciplinary action is detailed and shown below:

For **poor practice** it is likely informal action is taken by the club if it is the first time the individual has been reported/investigated for this level of behaviour. If it is repeated behaviour, then escalation to more formalised action as per the Club's disciplinary policy is required.

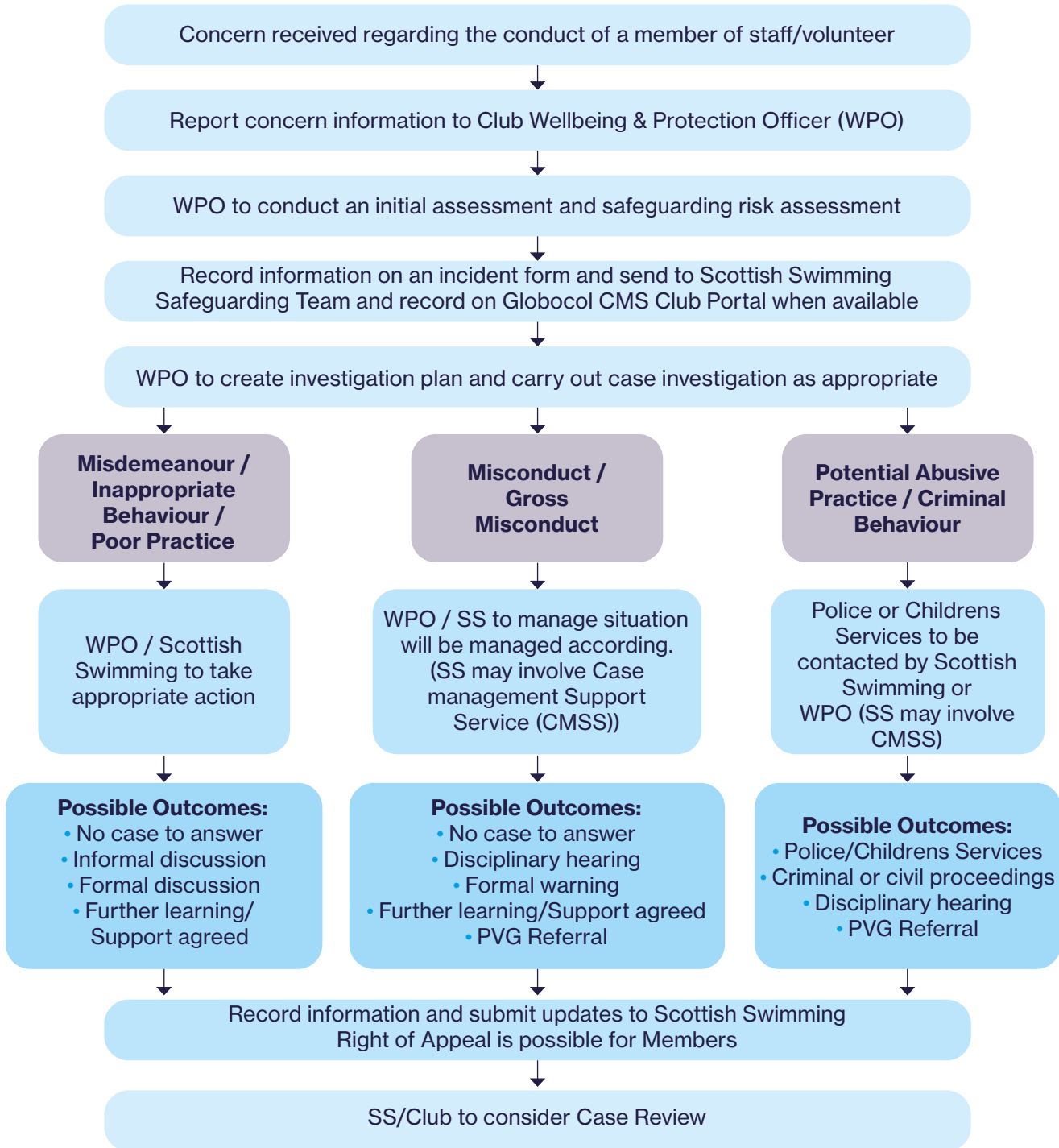
1. For **serious poor practice** or misconduct formal disciplinary action is recommended. Clubs should follow their disciplinary policy but likely to be formal verbal or written warning through to a temporary suspension
2. For **gross misconduct** formal disciplinary action is required. Clubs should follow their disciplinary policy but likely to be formal written warning or a temporary suspension
3. For **criminal activity**, the police/statutory services must be contacted. The club will liaise with and not interfere with a police/statutory services investigation. It is likely Scottish Swimming will put in place a whole sport interim precautionary suspension for the individual(s) involved that will remove the risk of any further harm being caused while the investigation is carried out
  - If the police/statutory services take action against the individual, then the club/Scottish Swimming is likely to have to remove the individuals from membership
    - If this is the case, then a PVG referral should be submitted
  - If police/statutory services take no further action it may be necessary for the club/Scottish Swimming to follow their disciplinary policy



In all cases the Scottish Swimming Safeguarding Team are available for support. More information about the case management (Investigations & Disciplinary Procedures) can be found on the Scottish Swimming website.

## 23.0 Procedures for Managing Cases of Abuse and Poor Practice

After receiving an incident report, the Scottish Swimming Safeguarding Team will consider the initial report and decide whether this is a case which can be dealt with by the club, i.e. a case of poor practice, misconduct or inappropriate behaviour. Or for cases of serious poor practice/gross misconduct or criminal activity, whether it should be dealt with in partnership with the club and Scottish Swimming or centrally by Scottish Swimming/statutory authorities. For all cases the case management process should be followed as detailed in section 24.0.



It is recommended that advice is sought from the Scottish Swimming Safeguarding Team if there is a risk of harm to a child or a statutory agency is involved. Scottish Swimming requires to be informed no later than 48 hours after the incident.

## 24.0 Case Management Process

With support of the Children First Case Management Support Service (CMSS) a robust 12 step case management process has been developed to support the management of concerns by Scottish Swimming and affiliated clubs. The Case Management Process is based on industry best practice and will be embedded into existing Scottish Swimming governance and procedures.

There is a suite of guidance, resources and templates that support each of the 12 steps in the new case management process. The guidance and resources are designed to support club committee members and WPOs to ensure the correct and most effective processes are in place when required. The process will be reviewed annually to ensure it remains fit for purpose.

**It is important to note that not all cases will require the utilisation of all 12 steps.**

- 1 Step 1 - Initial Assessment of the Situation - to determine the need to investigate and process required**
- 2 Step 2 - Safeguarding Risk Assessment - to determine the safeguarding risk posed to member(s) involved**
- 3 Step 3 - Terms of Reference (ToR) for Investigation - to determine what specifically needs to be investigated**
- 4 Step 4 - Investigation Plan - to detail how the investigation is going to be carried out and who will be involved**
- 5 Step 5 - Conducting Investigation Interviews - to plan and effectively carry out interviews with all those involved**
- 6 Step 6 - Analysis of Evidence - to review and interpret the value of all case evidence against each ToR**
- 7 Step 7 - Investigation Report - to summarise all of the key case information into a format that this be shared**
- 8 Step 8 - Presenting Investigation Findings - to present the case findings to the disciplinary panel/hearing**
- 9 Step 9 - Formal & Informal Disciplinary Action - to ensure the correct disciplinary decision is made based on evidence available**
- 10 Step 10 - Appeals - to allow a structured and fair avenue of appeal to individuals as appropriate**
- 11 Step 11 - Safeguarding Data Storage/Security Policy - to ensure all case information is managed appropriately**
- 12 Step 12 - Case Management Review Process - to ensure any learnings from the case management are highlighted**

Sean Dawson, Scottish Swimming Safeguarding Manager can provide case specific support to clubs as and when required, [S.dawson@scottishswimming.com](mailto:S.dawson@scottishswimming.com) 07801 578967 and general support provided through the safeguarding team [safesport@scottishswimming.com](mailto:safesport@scottishswimming.com).

Scottish Swimming can, at their discretion, seek ad hoc advice (including but not limited to) legal advice and/or support from the Children First Case Management Support Service (CMSS) or any other advisory body considered by Scottish Swimming to be appropriate. In appropriate cases a case review and/or opinion can also be sought from the CMSS or any other advisory body considered by Scottish Swimming to be appropriate.

For more information and to access the resources please see the Scottish Swimming website.

# 25.0 Scottish Swimming Case Management Review Group

## 25.1 Group Purpose

The Scottish Swimming Case Management Review Group (CMRG) is designed to provide an additional level of support to the Safeguarding Manager and/or Lead Case Officer and the CEO when making decisions regarding wellbeing & protection case outcomes involving Scottish Swimming affiliated Clubs and members. The panel is made up of a range of individuals who have been selected because of their specific skills and knowledge in the areas of legal, safeguarding, wellbeing and protection, education and aquatics sports knowledge. The CMRG purpose is not to make decisions but to provide recommendations and give expert advice to Scottish Swimming only. It is also designed to provide the Complaints/Appeals panels with necessary wellbeing and protection support and expertise as considered necessary.

The CMRG must ensure the wellbeing of the persons involved in any concern are paramount, with Children/young person's needs/concerns taking precedence over those of any adult where there is a perceived conflict of interest. The CMRG will adopt an open-minded approach until allegations/concerns have been investigated. The CMRG will help ensure those in our sport are safeguarded and protected from abuse regardless of their age, sex, ability, race, ethnic origin, gender reassignment, disability, religious or sexual orientation or other protected characteristics.

## 25.2 Group Remit

The remit of the CMRG is as follows:

1. Produce and/or review recommendations on the outcome of a case investigation being handled by Scottish Swimming to inform decision making processes
2. Ensure that decisions are made in compliance with the Scottish Swimming Safeguarding Policy and Procedures and the Scottish Swimming Governance
3. Liaise with the Lead Case Officer to ensure the necessary quantity and quality of information is presented regarding a case, to allow suitable and sufficient discussions to occur and for decisions to be made
4. Review a case and its outcomes, that has been handled by either Scottish Swimming or an affiliated club, in line with the Case Management Review Policy
5. Provide feedback to the Safeguarding Manager where the Safeguarding Policy or procedures need clarified or reviewed as a result of learnings from reviewing the management of a case
6. Liaise with the Lead Case Officer and CEO to review any information or recommendations provided by the Case Management Support Service when utilised
7. Liaise with the Lead Case Officer and CEO to review any recommendations provided by the Case Advisory Group of the Children First Case management Support Service, when this service is utilised
8. Support the Scottish Swimming Complaints/Appeals panel/committee with specific wellbeing & protection recommendations, and case information/interpretation as considered appropriate

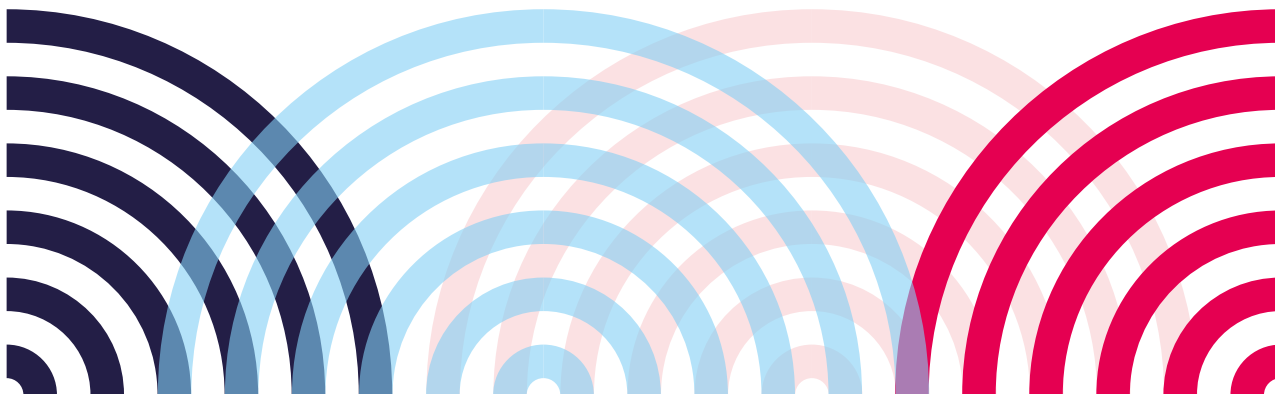
Scottish Swimming will utilise the CMRG to support with case management and review when considered necessary. More information is available in the Terms of reference for the group on the Scottish Swimming website.

## 26.0 Children First Case Management Support Service (CMSS)

The CMSS is a comprehensive, impartial service that offers support to Scottish governing bodies of sport including Scottish Swimming to manage and investigate child and adult wellbeing and protection concerns or complaints. Also available is a Case Advisory Group which is operated as part of the CMSS. This is an independent panel of wellbeing & protection experts that can be utilised for case specific advice including case reviews and case outcome recommendations.

A focus of this service is to support Scottish Swimming to develop and implement an effective case management system including the investigation and disciplinary & appeal hearings processes. This information will be introduced to all clubs when appropriate to allow consistency in how these matters are being managed across the aquatic sports. Support will be provided to the club WPOs to utilise and over time embed these new processes into clubs.

Scottish Swimming is committed to utilising the CMSS when required and will communicate to those involved in a case that it is being supported by the CMSS. Utilisation of the CMSS and the Scottish Swimming CMRG enable enhanced support for the Scottish Swimming Safeguarding Team and club WPOs and ensure robust and informed decisions are made regarding case outcomes.



## 27.0 Cross Border Safeguarding Jurisdiction & Information Sharing

Scottish Swimming regularly communicates and collaborates with Aquatics GB (AGB), Swim England (SE) and Swim Wales (SW) regarding matters of safeguarding, wellbeing and protection. This is to ensure that members of the three Home Nations as well as those involved in Aquatics GB activities are supported and protected, and removing any cross-border challenges as far as practically possible.

The following clauses detail the jurisdiction and information sharing arrangements between Scottish Swimming and AGB, SE and SW. There is a data sharing agreement in place between the Home Nations with information being processed, recorded and retained confidentially and sensitively as appropriate. The Scottish Swimming members privacy notice also reflects the information sharing process.

### Clause 1

For the wellbeing, safety, and protection of members the Safeguarding Manager, or the appropriate Lead Case Officer, will advise AGB, SE or SW as appropriate, of medical, wellbeing, conduct or safety matters limited to the minimum necessary information to address a specific situation. All information shared will be used solely for the purpose of ensuring the wellbeing, safety, and protection of that individual and will not be used for any other purpose.

### Clause 2

For the wellbeing, safety and protection of members the Safeguarding Manager, or the appropriate Lead Case Officer, will cooperate with AGB, SE or SW as appropriate, with investigations relating to medical, wellbeing, conduct or safety matters. All information shared will be used solely for the purpose of the specific investigation and will not be used for any other purpose.

### Clause 3

If during or upon completion of a case management process a member subject to investigation or sanction leaves Scottish Swimming membership to become a member of SE or SW the Safeguarding Manager, or the appropriate Lead Case Officer, will communicate the relevant case information/outcome to SE, SW or AGB as necessary. This will be for the reason of wellbeing, safety and protection of members across the Home Nations.

### Clause 4

Any individual applying for Scottish Swimming membership or transferring from Swim England or Swim Wales membership who is:

- a. currently under investigation by their current national governing body due to conduct or safeguarding related matters
- b. currently has membership suspended by their current national governing body due to conduct or safeguarding related matters
- c. is under disciplinary measures by their current national governing body due to conduct or safeguarding related matters
- d. has had membership revoked by their previous national governing body due to conduct or safeguarding related matters

must inform the Scottish Swimming Safeguarding Team ([safesport@scottishswimming.com](mailto:safesport@scottishswimming.com)) of these matters prior to applying for membership with Scottish Swimming. Failing to inform Scottish Swimming of matters which may affect the individual's ability to become a member may result in disciplinary action.

## 28.0 Making Referrals

### 28.1 Protection of Vulnerable Groups (Scotland) Act 2007: Referrals

The Protection of Vulnerable Groups (Scotland) Act 2007 is in place to make sure unsuitable individuals cannot work or volunteer with children (regulated work). A key part to this process working correctly is for a clubs or Scottish Swimming to pass on information to Disclosure Scotland when they identify an unsuitable individual within a club.

The PVG Scheme requires organisations to make referrals to the Protection Unit at Disclosure Scotland in certain circumstances. If the club/Scottish Swimming permanently remove someone from regulated work it needs to be decided if the reason(s) that they were removed means Disclosure Scotland need to be informed about what happened. This is called “Making a Referral” and includes circumstances where you would have removed them if, for any reason, they have already left the role.

Disclosure Scotland will then use this information to help them decide if someone remains suitable to continue to undertake regulated work with children or if they should be removed from regulated work.

### 28.2 When Should Scottish Swimming/Club let the Protection Unit know?

Scottish Swimming/Club should only make a referral when both Condition 1 and Condition 2 below have been met. Condition 2 is meeting a minimum of 1 of the 5 points.

#### Condition 1

- A person has been permanently removed/removed themselves from regulated work
- This includes suspension which requires the person to reapply for their role when the suspension period has ended

#### Condition 2

##### At least 1 of the following 5 grounds apply to their permanent removal:

- Caused harm to a child or protected adult
  - Placed someone at risk of harm
  - Engaged in inappropriate conduct involving pornography
- Engaged in inappropriate sexual conduct
- Given inappropriate medical treatment

When both conditions have been met, Scottish Swimming or the club must let Disclosure Scotland know by making a referral. Making a referral is not optional. It is a legal requirement to report circumstances where both conditions are met. This should be done within three months of the decision being made. Clubs are required to have a Referral Policy in place.

### 28.3 Who Is Responsible For Making The Referral?

1. When a club carries out disciplinary action and makes the decision to permanently remove someone from regulated work, the club are responsible for making the referral. In these circumstances the club must contact Sean Dawson, Scottish Swimming Safeguarding Manager ([s.dawson@scottishswimming.com](mailto:s.dawson@scottishswimming.com)) in the first instance for support.
2. Where Scottish Swimming takes disciplinary action which means that they have to remove someone from regulated work in a club, national programme activity or national event activity, Scottish Swimming is responsible for making the referral. Scottish Swimming will communicate with the club as appropriate.

More information is available from the Scottish Swimming Website – **Regulated Roles & Referrals**

## 29.0 Case Management Review Process

Scottish Swimming is committed to ensuring cases of a Wellbeing & Protection nature are managed as effectively and as efficiently as possible. Ensuring that there is a managed process in place for reviewing case investigation and decision-making processes on a regular basis is good practice and supports with the Scottish Swimming safeguarding risk assessment and management processes.

Having a case management review process in place provides an opportunity to:

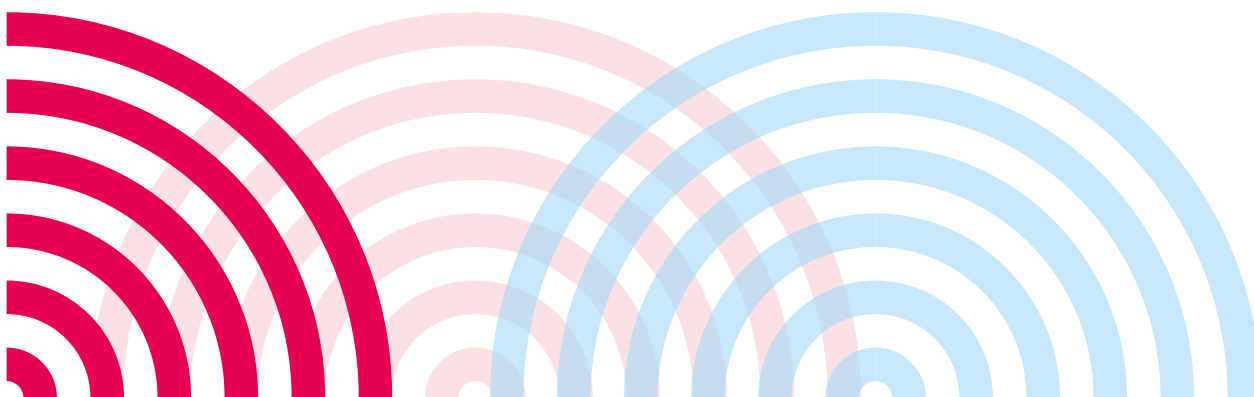
- Explore if policies and procedures were followed and were effective
- Identify if the correct governance was followed and whether any improvements are required
- Establish whether appropriate action was taken
- Examine the role of individuals involved in responding to and managing the case to establish whether further support or training is required
- Review how well the club/Scottish Swimming worked with other organisations involved in the case
- Identify if any changes are required or recommendations for the future
- Identify specific areas of risk, trends, or patterns
- Increase the confidence of those involved in the club/Scottish Swimming by demonstrating an open and transparent approach

Clubs should conduct a case review:

- At the conclusion of any case dealt with through the procedures for responding to concerns
- At the conclusion of legal proceedings where the club has been involved in the investigation
- At the conclusion of disciplinary proceedings, including an appeal
- As part of the regular review of all child wellbeing and protection cases but particularly where Police, Child social services or other statutory agencies have been involved in a case

The Club should conduct the review of the case(s) once the case has been closed and the matter has concluded. The case management review should be completed no later than 8 weeks from the conclusion of the case. Ensuring the correct people are involved in the case review is key. Generally, the case management review should be managed by either the club WPO or the Club Chairperson where there is no conflict, and that person should be supported by up to two others from the Club Committee who should also be clear of conflict with the case being reviewed (i.e. they were interviewed as part of the investigation).

More information with regards to how to carry out the review, format of review and the role of Scottish Swimming is detailed within Safeguarding Guidance Appendix SG34.



# 30.0 Data Protection

## 30.1 Data Protection Principles

Clubs have a duty to comply with the data protection legislation and regulations in place. Information about concerns of abuse includes personal data, potentially amounting to criminal offence data. It is therefore important to be clear as to the grounds for processing and sharing information about concerns of abuse.

Processing information includes record keeping. Records relating to safeguarding concerns will be accurate and relevant. Scottish Swimming stores all such concerns on encrypted servers with access limited to those who require it. Clubs must make arrangements to ensure that all safeguarding records are kept securely, with access limited only to those who need it.

WPOs in clubs must be able to access records in a timely manner, and these records must be organised, and easily searchable. Arrangements must be made to ensure that access to safeguarding records is transferred to any new WPOs.

It is strongly recommended that WPOs do not use a personal email for their role, and the club should arrange for a specific email address that can only be accessed by the WPO. Access to this email address must also be transferred to any new WPOs, and log-in details (such as passwords, and two-factor authentication details) must be changed when there is a change to the WPO.

Sharing information, with the right people, is central to good practice in safeguarding. However, it must only take place where necessary and not excessively, and where considered necessary to ensure the safety of a member.

Data protection legislation is not a bar to the handling of safeguarding information and sharing concerns with other clubs/organisations where required. Concerns will be shared internally within Scottish Swimming to ensure that reports made to any individual within Scottish Swimming are referred to the Safeguarding Team and to arrange Case Management Groups to consider safeguarding concerns.

If you are aware of a concern and are in doubt as to whether to share information, please seek advice from the Scottish Swimming Safeguarding Team and explain the situation without giving personal details about the person at risk or the person causing harm.

Any decision to share or not to share information with an external person or organisation must be recorded together with the reasons to share or not share information.

## 30.2 Multi-agency working

Safeguarding legislation gives Local Authorities a leading role, however, it is recognised that safeguarding can involve a wide range of organisations. Scottish Swimming may need to cooperate with the Local Authority Child services Team and the Police, including but not limited to:

- Providing more information about the concern you have raised
- Providing a safe venue for the adult to meet with other professionals, for example, Police, social workers or advocates
- Attending safeguarding meetings
- Coordinating internal investigations (e.g. complaints, disciplinary) with investigations by the Police or other agencies
- Sharing information about the outcomes of internal investigations
- Providing a safe environment for the adult to continue their sporting activity / their role in the club

Information sharing is essential for effective safeguarding. When taking decisions about what information to share, you must consider how much information you need to release. Not sharing more data than is necessary is a key principle of the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, and you should consider the impact of disclosing information on the information subject and any third parties. Information must be proportionate to the need and level of risk.

The most important consideration is whether sharing information is likely to support the safeguarding and protection of a child at risk. There will be incidents where sharing information with a person (or their parent/guardian) suspected of a criminal offence may compromise an investigation. Please seek advice from the Scottish Swimming Safeguarding Team in such cases.

## 30.0 Data Protection (continued)

### 30.3 Requests for Information from Statutory Authorities

Scottish Swimming's Safeguarding Team or the CEO will deal with any enquires if the organisation is contacted by the Police or Child Social Services concerning information received or a child protection complaint has been made by or about a member, volunteer or employee or member club.

If a member club receives a request of this nature they are advised to contact the Scottish Swimming Safeguarding Team for guidance and support. Clubs should cooperate fully with official requests for factual information, but do not express any personal opinions on the person's conduct.

### 30.4 Confidentiality

Confidentiality must be maintained at all times when a concern has been raised and is being investigated. Clubs must only tell individuals who need to know and can help in managing the concerns. If the concern relates to a child, and their parents/guardians are not implicated in the concern, ensure they are made aware at the earliest opportunity.

Consider the best method of communication to maintain confidentiality and be mindful of the environment. For example, who else is around you, can you make a phone call without others overhearing your conversation? If breached, confidentiality can put people at risk of further harm either by further inappropriate action of an individual(s) involved or other individuals who hear about the concern through rumours. Ultimately, any investigation may be impeded by misinformation or rumours.

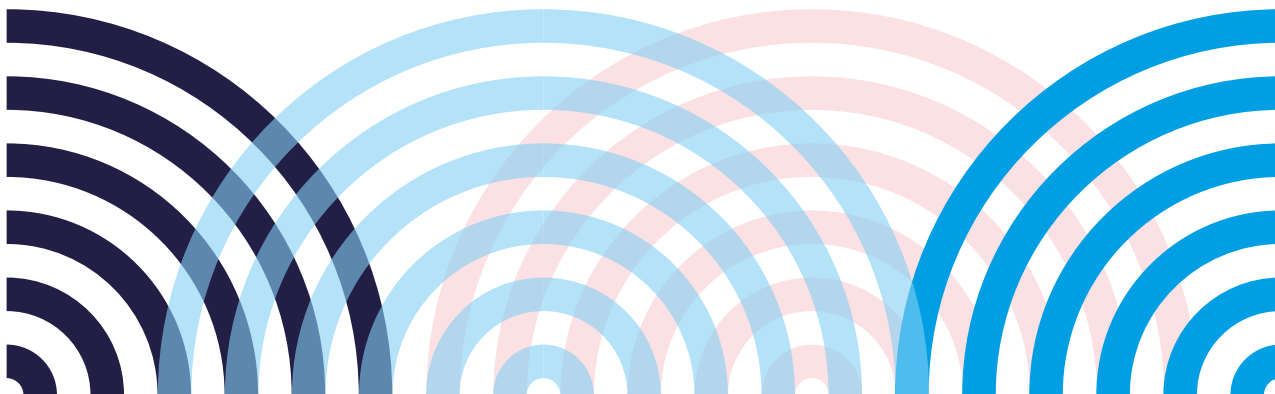
### 30.5 Scottish Swimming Data Protection Resources

To carry out and support clubs with the functions of safeguarding investigations and case management, Scottish Swimming have a few key resources/policies that clubs are required to have in place:

- Club Secure Handling Policy, (Scottish Swimming also have a Secure Data Handling Policy)
- Club Safeguarding Data Policy
- Fair Sharing Agreement
- Club Privacy Notice

Scottish Swimming can, at their discretion, seek ad hoc advice (including but not limited to) legal advice and/or support from the sportscotland CMSS or any other advisory body considered by Scottish Swimming to be appropriate. In appropriate cases a case review and/or opinion can also be sought from the CMSS or any other advisory body considered by Scottish Swimming to be appropriate.

Where cases utilise the services of the CMSS or Case Advisory Group through Children First a specific data clause applies, and this can be found on the Scottish Swimming website. If you have any specific data protection queries then please contact [dp@scottishswimming.com](mailto:dp@scottishswimming.com) or the Scottish Swimming Safeguarding Team.



# 31.0 Guide to Safeguarding Appendices

## 31.1 Summary of Safeguarding Guidance Appendices

Appendix Number	Appendix Title	Description of Appendix Content
SG1	Definitions of Poor Practice	Detailed definitions and explanations of the different types of poor practice that can be found in sport. Information specifically about what would be classed as breaches of the Safeguarding Policy due to poor or bad practice, practices that are carried out with the best intentions but are classed as potential opportunities to abuse and practices that can never be condoned.
SG2	Identification of Child Abuse	Information regarding identifying abuse. Specific information and examples of the different types of abuse; Neglect, Physical, Sexual, Emotional with additional information included on Grooming.
SG3	Concern Assessment Threshold	Details of the Case Management Thresholds from poor practice to serious poor practice and misconduct, to gross misconduct and criminal activity. Suggested disciplinary action for each of the level is also explained as is the importance of codes of conducts and the reporting of low-level concerns.
SG4	Concern Reporting & Investigation Process	Explains what process a club should follow in the event a safeguarding concern is reported. Process flow chart includes stages from the initial report being received to the review of a case once closed.
SG5	Case Management Process	Explanation of the 12 stages to managing a safeguarding case effectively. From the initial assessment and risk assessment to conducting the investigation and reporting findings to disciplinary action and appeals. Full resources and templates are available on the Scottish Swimming Website for each of the 12 stages.
SG6	Changing Room Management	Provides guidance to clubs for managing changing room spaces when adults and children have to use the same changing spaces in private and public venues, as well as advice around supervising changing room spaces.
SG7	Missing Children	Explains the considerations a club should take for when a child goes missing from club activity.
SG8	Athlete Collection Arrangements	Details best proactive arrangements for clubs to have in place for athlete collections. Considerations for late collection of athletes is also detailed.
SG9	Children Attending Centres Unaccompanied	Details points for clubs to consider when children are attending venues unaccompanied.
SG10	Transporting Children	Provides guidance to clubs for when they are transporting children as part of club activities and additional information provided for clubs for when there are arrangements between parents for transporting children.
SG11	Team Travel and Accommodation	Explains the requirements for safer recruitment and supervision, including adult to child ratios, considerations for different types of accommodation and information on carrying out risk assessing and developing emergency plans.
SG12	Adult to Participant Coaching Ratios	Details the recommended ratios for club training sessions based on coach qualification level and number of athletes. Also details the requirements for the temporary use of Level 1s where a Level 2 is unavailable.
SG13	Safeguarding LGBTQ+ Young People	Information from the NSPCC regarding the inclusion of LGBTQ+ members with the club environment. Includes some best practice for clubs and points to consider avoiding.

## 31.1 Summary of Safeguarding Guidance Appendices (continued)

Appendix Number	Appendix Title	Description of Appendix Content
SG14	Physical Contact & First Aid	Advice for coaches for when coaching/teaching in the water vs from poolside. Also includes best practice points to consider for physical contact between coaches and athletes and the provision of first aid.
SG15	Managing 1:1 Situations & Lone Working	Advice for coaches to consider when lone working at a facility or coaching in a 1:1 situation with an athlete.
SG16	Mixed Age Training Arrangements	Provides guidance for Swimming and Water Polo training and competitions for mixed age and gender sessions to keep athletes safe.
SG17	Anthropometric Measurements (U18)	Details the requirement for no weighing of athletes under 18. It also provides information around anthropometric measurements for athletes under 18.
SG18	Supporting Under 18 Volunteers	Includes details of how to support volunteers within a club who are under 18. this includes safer recruitment, legal and best practice considerations.
SG19	Relationships with Members Under 18	Explains the relationship/position of trust that coaches and team staff have over athletes particularly those under 18 and the need to respect this relationship.
SG20	Event Safeguarding Management	Details the requirements for incident and accident reporting at aquatics events, the application of event passes along with the best practice guidance on event photography.
SG21	Child Abuse Images	Details the difference between experimental and aggravated taking and distribution of images and explains the process for managing concerns that clubs should follow.
SG22	Photography of Members	Outlines the requirements for photography of members within and out with the pool environment. Also provides information of the risks of photography in the aquatics environment and advice for clubs when utilising an official photographer.
SG23	Digital Technologies for Members	Explains the safeguarding risks for all members and the best practice advice of using digital technology.
SG24	Online Contact & Communication with Children	Details best practice for coaches and volunteers when utilising technology to engage with young members. Includes advice for coaches under 18, coaches aged 18-21 and using social media in a safe manner.
SG25	Setting Up Social Media Accounts	Advice and best practice to clubs when setting up their social media accounts to ensure the platforms remain safe for members to use and for clubs to utilise them effectively for promotion and communication.
SG26	Sextortion Management	Provides specific guidance around the dangers and advice to clubs about the management of sextortion for members under 18.
SG27	Managing Difficult Behaviours	Provides guidance to coaches and club members regarding dealing with difficult behaviours, planning activities effectively and dealing with physical interventions in a safe manner.
SG28	Anti-Bullying Policy	Provides information regarding protecting young people from bullying within the club. Also, can be used as a template for clubs to adopt in order to create their own policy.

31.1 Summary of Safeguarding Guidance Appendices (continued)

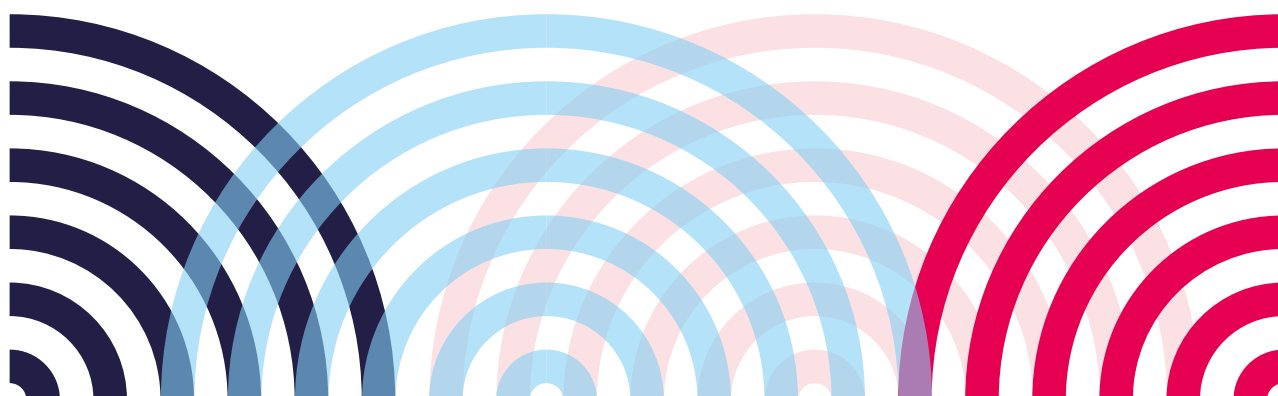
Appendix Number	Appendix Title	Description of Appendix Content
SG29	Club Safeguarding Policy Statement	A template statement for clubs to adopt and display to members which explains their commitment to safeguarding and protecting the members of the club.
SG30	Rights of the Child & Athlete Voice	Explains the importance of gathering the view of athletes and young people, utilising their views in shaping the direction of the sports and information on the Rights of the Child legislation and what it means for Scottish Swimming and affiliated clubs.
SG31	Safeguarding Standards	Displays the 8 safeguarding standards that have been published from Children 1st and sportscotland that requires Scottish Swimming to adopt and embed into policies and resources in order to deliver these standards within the aquatic sports.
SG32	Getting It Right For Every Child	Explains the Getting It Right For Every Child framework from the Scottish Government.
SG33	Safeguarding Legislation	Details a list of safeguarding related legislation that is relevant to clubs and has informed the Safeguarding Policy and supporting appendices to support clubs.
SG34	Case Management Review Process	Thoroughly explains the case management review process that Scottish Swimming and clubs should follow upon conclusion of a safeguarding case.

31.2 Summary of Safeguarding Agreements

Agreement Number	Agreement Title	Description of Agreement Content
SA1	Code of Conduct (Athlete U18)	Template code of conduct for Athletes aged 17 and under training and competing within affiliated aquatic clubs.
SA2	Code of Conduct (Coaches & Teachers)	Template code of conduct for Coaches and Teachers working within affiliated aquatic clubs.
SA3	Code of Conduct (Parents & Guardians)	Template code of conduct for Parents & Guardians supporting their athletes within affiliated aquatic clubs
SA4	Code of Conduct (Officials & Volunteers)	Template code of conduct for Volunteers and Officials volunteering within affiliated aquatic clubs.
SA5	Activity & Transport Agreement	Template activity, transport, medical and photographic agreement for participants (athletes and volunteers).
SA6	Mobile Phone Use Agreement	Template Mobile Phone Use Agreement for clubs to adopt/adapt for members to complete.
SA7	Code of Conduct (Athlete 18 & Over)	Template code of conduct for Athletes aged 18 and over training and competing within affiliated aquatic clubs.
SA8	Code of Conduct (Team Managers)	Template code of conduct for Team managers working within affiliated aquatic clubs.

31.3 Summary of Safeguarding Incident & Accident Forms

Form Number	Form Title	Description of Form Content
INC1	Club Incident Report Form	Form for completing incident/concern/complaint details for something that has happened during club activity. This form should be submitted to Scottish Swimming once completed.
INC2	Event Incident Report Form	Form for completing incident/concern/complaint details for something that has happened at a competition/event. This form should be submitted to Scottish Swimming once completed.
INC3	Club Accident Report Form	Form for completing accident details for something that has happened during Club activity. This form should be submitted to Scottish Swimming once completed.
INC4	Event Accident Report Form	Form for completing accident details for something that has happened at a competition/event. This form should be submitted to Scottish Swimming once completed.
INC5	EDI Incident Report Form	Form for completing incident details regarding an equality, diversity or inclusion matter at a competition/event. This form should be submitted to Scottish Swimming once completed where the matter will be investigated/resolved.







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