



Cossum Swim Schools

Safety Policy
&
Risk Assessments

Review Date	Reviewed by
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1. General statement

We aim to act as a good employer and to carry out our business activities in a way which will achieve the highest possible standard of health and safety for our employees, visitors and members of the public. We see managing health and safety successfully as central to all our other business activities and all levels of management, including the owner and supervisors consider it as important.

All employees must co-operate to promote health and safety within the company. This may involve carrying out safety inspections and reporting any concerns regarding health & safety.

We aim to comply with all relevant legal requirements and codes of good practice, in particular we will make reference to HSE's Managing health & safety in swimming pools guidance (HSG 179) and the swimming teachers association (STA) codes of practice.

In particular we will:

- assess risks to all employees while at work;
- provide and maintain safe working conditions and equipment;
- provide instruction, information, training and supervision;
- provide suitable protective equipment where necessary;
- provide adequate resources; and
- keep training records.

Each employee has a duty to co-operate by:

- taking reasonable care of their own and others' health and safety;
- adhere to Cossum swim schools procedure;
- comply with the STA codes of practice
- reporting incidents or hazards which could lead to injury or damage;
- not interfering with anything provided to protect their health and safety; and
- using personal protective equipment provided.

Signed

Date

Des Cossum, Owner

2. Organisational responsibilities

Whilst overall responsibility for health and safety rests with the owner, all staff have health and safety responsibilities, and the following list details the primary health and safety responsibilities of all staff. Management have direct contact with staff and will consult on health and safety issues as appropriate.

2.1 Owner

Overall and final responsibility for health and safety is that of Des Cossum – Cossum swim schools owner. Responsibilities include

- To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.
- To provide adequate training to ensure employees are competent to do their work.
- To engage and consult with employees on day-to-day health and safety conditions and provide advice and supervision on occupational health.
- To maintain safe and healthy working conditions, provide and maintain plant, equipment and machinery, and ensure safe storage/use of substances.

2.2 Swimming teacher responsibilities

- To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.
- To control swimming lessons and participants to ensure classes are carried out in a controlled manner and in accordance with the STA's codes of practice.
- To implement emergency procedures – evacuation in case of fire or other significant incident.
- Responsible for making sure that the health and safety policy is put in place fully within the business's day-to-day activities.
- Carry out ongoing assessments of the general health and safety of the premises, report incidents or hazards which could lead to injury or damage

2.3 Student teacher

- To assist swimming teachers to implement emergency procedures – evacuation in case of fire or other significant incident.

- To assist swimming teachers to control swimming lessons and participants to ensure classes are carried out in a controlled manner and in accordance with the STA's codes of practice.

2.4 Supervisor (Coleraine Grammar only)

- To prevent accidents and cases of work-related ill health and provide adequate control of health and safety risks arising from work activities.
- Responsible for making sure that the health and safety policy is put in place fully within the business's day-to-day activities.
- Responsible for looking after the first-aid box and carrying out the weekly visual health and safety inspections.
- To supervise teachers taking swimming lessons and ensure classes are carried out in a controlled manner and in accordance with the STA's codes of practice.
- To implement emergency procedures – evacuation in case of fire or other significant incident.
- Carry out ongoing assessments of the general health and safety of the premises, report incidents or hazards which could lead to injury or damage.

3. Arrangements

This health and safety policy statement is supplemented by specific responsibilities, policies, codes of practice, guidance notes, and training courses as are required to address relevant work places and work activities.

The safety policy will be read through with staff upon induction and are available to all staff upon request at any time; these are ongoing documents that will be revised as and when required and any such revisions will be brought to the attention of all members of staff.

3.1 Training

All staff have undertaken teacher training courses provided by either the Swimming Teachers Association (STA) or the Amateur Swimming Association (ASA) and hold a minimum lifesaving qualification to the standard that meets the requirements of HSG 179. This is updated every 2 years as required by the STA in order to validate the swimming teachers' qualifications. It is the responsibility of teachers to ensure that their lifesaving qualifications remain up to date.

Staff must provide copies of certificates of their swimming teacher qualifications, safeguarding children course, CRB check and up to date lifesaving qualifications.

All staff will be provided with site specific induction training upon employment. Ongoing training will be provided by means of Continuous Professional Development (CPD) seminars and teacher updates required by the STA.

3.2 Health & safety poster

Health and safety posters are displayed:

- Coleraine Grammar - pool office
- Bushtown Hotel – Office
- Anchor House, Donaghmore
- Toomebridge, Airfield Road

3.3 Reporting accidents

Accident report forms are provided in each venue and must be completed when an accident happens to staff, visitors or members of the public. Accident report forms must be forwarded to the supervisor / owner who will determine whether or not the accident is reportable under RIDDOR.

Accidents and ill health at work are reported under RIDDOR (Reporting of Injuries, Diseases and Dangerous Occurrences Regs) www.hse.gov.uk/riddor

The teacher / owner must report all deaths and serious accidents immediately to the enforcing authority and fill in a NI2508 form and send it to the enforcing authority within 10 days of the incident. Accidents likely to result in an employee being absent from work for more than three days must also be reported to the appropriate enforcing authority using the NI2508 form. This must be done within 10 days of the incident happening.

The relevant enforcing authorities are:

Coleraine Grammar:

Health & Safety Executive
83 Ladas Drive, Belfast, BT6 9FR.
Belfast
BT6 9FR
Tel: 028 9054 7025

Toomebridge, Airfield Road

Mid Ulster District Council
50 Ballyronan Road
Magherafelt
BT45 6EB
Tel: 03000 132 132

Bushtown Hotel Coleraine:

Causeway Coast & Glens Council
Cloonavin
66 Portstewart Road
Coleraine
BT 52 1EY
Tel: 028 7034 7034

Anchor House, Donaghmore:

Newry, Mourne & Down District
Monaghan Row
Newry
BT35 8DL
Tel: 028 3031 3031

Incident reports are also available and must be completed in the case of 'near misses' or occurrences that have not resulted in a person being injured but could have had the potential to do so.

3.4 Fire safety

At Coleraine Grammar, and the Bushtown Hotel, fire drills and risk assessments are the responsibility of the respective owners. Cossum swim schools staff must however be familiar with the emergency action procedures as provided by each pool.

At Donaghmore & Toomebridge pools – fire drills and risk assessments will be managed by the pool proprietors and are available in their respective EAP.

All teachers working at any venue should ensure that:

- fire exits are kept clear at all times
- fire extinguishers are kept in their correct positions
- employees should remove any obstructions to the emergency escape routes and report this to management.

3.5 Electrical safety

Electrical equipment provided by Cossum swim schools shall be regularly visually inspected and an annual portable appliance test (PAT) carried out annually. Equipment provided in venues shall be the responsibility of the premises.

In all venues, employees should report any faulty equipment and remove or report it. In particular visual inspections should include checks for

- loose wires
- trailing cables
- signs of overheating, for example, blackening around the plugs and socket outlets
- damage, for example, cuts, splits or severe rubbing to the outer casing (sheath) of the cable
- damage to the plug, for example, the casing is cracked or the pins are bent
- make-do repairs and connections, for example, taped joints in the cable
- damage to the casing of the equipment or obviously loose parts or screws

- overheating in other words, a burning smell or burn marks on the casing, cable, plug or the socket from which the equipment was disconnected
- the cable not being properly gripped where it enters the plug or equipment - look to see if the coloured insulation of the wires inside are showing.

3.6 Manual handling

Staff are provided with basic manual handling advice through their swimming teacher / lifesaving training. However the following is advised:

- Stand close to the load
- Bend your knees and keep your back straight
- Grasp the load firmly
- Lift with your legs and not your back
- Never lift a load that is too heavy - get help.

Specific risk assessments have been completed for activities considered to be high risk.

3.7 Good housekeeping

Good housekeeping is essential to ensure safety and hygiene and all staff have a responsibility to keep poolsides, changing facilities and general areas clean and tidy. Floats and teaching equipment must be tidied between classes and stored in the designated areas.

3.8 Contact with children

Cossum swim schools teachers are all expected to comply with the STA's policies and codes of conduct. On occasions we understand that the most appropriate method of teaching is water based teaching, in particular for younger children who may require assistance in the water and baby and pre-school classes. In these cases all teachers are expected to comply with the STA's policy guidelines on swimming teaching where the teacher is in the water. These are detailed below:

'It is preferable for the swimming teacher to conduct swimming lessons from the poolside; there are a number of reasons for this, including:

1. *Safety - the teacher is able to maintain full visual cover of all their students from the poolside and thus be in a position to react quickly to any incidents that may arise.*

2. *Observation - the swimming teacher on the poolside is in a better position to analyse the student's skills.*
3. *Teacher protection - due to their proximity to the students, and the difficulty of seeing exactly where a teacher has their hands; swimming teachers can be more vulnerable to accusations of abuse if they are teaching in the water.*

Nevertheless STA recognise that teaching in the water can be very effective and beneficial to many students. If Teachers are teaching in the water then STA strongly recommend that the responsible person (swim school owner, centre/pool manager etc.) have suitable and sufficient risk assessments undertaken to determine the maximum number of students that a single Teacher can teach for each specific type of lesson (e.g. beginners, improvers, adult etc...) while they are in the water.

It is an STA requirement that:

1. *When swimming lessons are in progress, there must always be at least one person on duty on the poolside who is suitably qualified in pool rescue.*
2. *All STA swimming teachers must have an approved and in-date pool rescue award.*

To help with the risk assessment STA recommend that the following points are taken into consideration:

- *What is the age of the students? Will they be able to understand safety instructions given to them by the teacher?*
- *Do any of the students have special needs/requirements and/or medical conditions e.g. hearing difficulties, visual impairments, learning difficulties, hidden conditions, physical disabilities etc...?*
- *Additional support and supervision may be required dependent upon the individual needs of the student*
- *Are there any site specific characteristics of the pool that may present special risks? E.g. sudden changes in depth, blind spots, specular reflection etc...*
- *These may require more than one person qualified in pool rescue to be on duty on the poolside*
- *How deep is the water?*

- *Non-swimmers and younger students will be safer in water of their own standing depth*
- *What is the size and shape of the pool?*
- *Small pools with fewer lessons are easier to supervise*
- *How many lessons are taking place?*
- *More lessons may require more than one pool rescuer on the poolside, due to higher risks with the increased numbers of pupils to supervise, increased noise levels etc...*
- *How many poolside rescuers will there be?*
- *Will one rescuer be overseeing one class or several? Supervising one class will give a greater degree of safety.*
- *What is the temperature of the water?*
- *The warmer it is, the quicker the Teacher will become de-hydrated*
- *The colder it is, then the Teacher may need to be provided with some form of thermal protection (Personal Protective Equipment) i.e. wet suit.*
- *How long will the teacher remain in the water?*
- *STA recommend that Teachers should not teach in the water for longer than two consecutive hours before having at least a thirty minute break to allow themselves time to recover from the water temperature and pool humidity, to hydrate and refresh themselves and to allow their vocal cords to rest. It is also recommended that a Teacher does not teach more than two two-hour blocks per day in the water.*
- *Is there a regular change of pool rescue cover?*
- *This is to prevent the pool side rescuer from becoming fatigued and allowing them to remain vigilant and alert.*

STA recommend that the following guidelines are also observed:

- *The maximum depth of water in which a teacher can operate safely is when the water is at approximately the mid-chest line. Note: The swimming teacher in the water must be able to stand and walk freely and not be forced, by the depth of water, into a floating position.*
- *The teaching positions will be different when teaching in the water; the teacher must always position themselves so that they have the whole class under observation. Note: Particular attention must be paid when the swimming teacher is attending to an individual pupil; the teacher must be aware of the safety of the rest of the class and this may necessitate the remainder of the class being on poolside.*

- *The parent/guardian should be informed that the swimming teacher will be in the water and advise them of the reasons and benefits to the student.*
- *The parent/guardian should also be informed of the methods of manual support, if any, that will be used and obtain their consent to their use.*
- *The swimming teacher should only use methods of manual support that are appropriate to the age and ability of the student.*
- *Prior to using manual support the teacher should inform the student, explain the procedure and seek the student's permission.*
- *Manual support should only be given when necessary and only for as long as it is required.*
- *The swimming teacher should keep his/her hands in view whenever possible.*
- *The swimming teacher should be easily recognisable as the instructor by, for example, wearing a 'Teacher' T-shirt.*
- *The swimming teacher should not infringe on the personal space of the student and should be aware of familiarity that may come from students.'*

3.9 Teaching babies to swim

All swimming teachers that are teaching baby and preschool children have been provided with training, either provided in house by Cossum swim schools staff, or have completed the STA baby and pre-school teachers qualification or equivalent. Staff are also expected to familiarise themselves with the STA policy on teaching baby and pre-school children. This is detailed below:

'There is a great deal of confusion regarding baby swimming, principally the areas of concern are:

- *The earliest date at which babies can be introduced to the swimming pool*
- *Submersions*

Starting Baby Swimming

- *The policy of the STA, with regard to introducing babies to aquatic activities is:*
- *Babies should only be introduced to water in line with the most recent recommendations from the Department of Health. This can be found on <http://www.sta.co.uk/>. The current recommendation, at the date of publication, is "your baby does not need any immunisations before they go swimming".*

- *The teacher should ensure that the midwife, health visitor or doctor is happy for the baby to be introduced to a public swimming pool.*
- *The water and air temperature must be higher than for normal public swimming; at least 30°C (32°C for babies under 3 months old or weighing less than 5.5 kilos/12 lbs).*
- *Baby swimming during the first six months should not take place in sea-water (see explanatory note 1).*
- *Babies should wear specialised waterproof nappies, and ideally double nappies, to prevent leakage.*
- *Very careful introduction must be carried out to prevent a long-term fear of water being developed.*
- *The teaching of babies and infants should only be undertaken by holders of a suitable specialist teaching certificate such as the STA Baby and Pre-School Certificate.*

Submersion Policy

The policy of the STA relates to intentional submersion as a practice in a structured session. It is not intended to include accidental submersions or quick dunks which may well happen on a frequent basis (see explanatory note 2):

Introduction

- *Submersion is an important part of introducing babies to the aquatic environment but should not be the dominant focus as it can be counterproductive to a good foundation in swimming.*
- *Forced submersion is not best practice; it must not be carried out.*
- *Submersion should only take place when the baby is ready and only then as part of a fun exercise.*
- *Submersion at an inappropriate time will lead to distress and may result in a baby permanently being frightened of water.*
- *Submersion practices should be progressive and should be stopped immediately if the baby shows any signs of distress or unhappiness.*
- *Submersion should only take place when the baby is prepared and involved in the fun; it should not be attempted when the baby is looking away or is unaware of what is about to happen.*

- *The frequency, depth and duration of submersions should be controlled within the guidelines set out below (see explanatory note 3).*

Frequency of Intentional Submersions

- *The frequency of intentional submersions should be based on the baby's age, physical ability and experience. It will also depend upon the swimming teacher's style and technique of teaching.*
- *The number of intentional submersions per session should be built up progressively at the baby's pace. It is suggested that an appropriate rate on increase would be an increase of 6 submersions over 6 sessions.*
- *As a guideline the STA suggests that the following frequencies be used:*
- *For babies under 6 months old a maximum of 6 intentional submersions per session; in addition the baby may make a number of accidental submersions. Initially there may only be one or two submersions, building up to more as the baby develops in age, physical ability and experience.*
- *For babies aged 6 to 12 months old the number of intentional submersions can be built up to a maximum of 12 intentional submersions per session in addition to any accidental submersions.*
- *For toddlers over 12 months old there need be no upper limit.*

Depth of Submersion

- *The depth of submersion is dependent upon age, physical ability and experience of the baby. The STA recommend that:*
- *No baby under 12 months should be submerged to a depth greater than 1 metre.*
- *Babies and toddlers over 12 months can progressively build up to a maximum submersion depth of 1.5 metres.*

Duration of Submersion

- *Babies under 12 months can progressively build up to a submersion time of 3 seconds.*
- *Babies and toddlers over 12 months can progressively build up to a submersion time of 10 seconds.*

Explanatory Notes

- 1. The natural swallowing reflex in young babies means that some water will enter the stomach and in cases where it contains salt, the salt will be absorbed. The kidneys of very young children are not developed enough to handle salt; salt overdosing can lead to serious illness and in extreme circumstances death.*
- 2. An intentional submersion would be to a maximum depth and duration as specified in the policy above and would be carried out within a structured baby swimming session. Where the submersion activity involves more than 1 short submersion, within a duration specified in the policy, e.g. mini dunks then this should count as 1 submersion. See chapter 14 in Baby & Pre-school Aquatics Training Manual by STA for further explanations and definitions.*
- 3. The principal concern surrounding the number of submersions a baby undertakes is related to water intoxication (hyponatremia).*
- 4. There has not been significant or recent research on this subject other than that carried out by Karl G Rosen, MD, PhD, published by the Swedish Paediatric Association in collaboration with the Swedish Board of Health and Welfare together with the Swedish Swimming Association. His research has shown that a baby needs to drink at least 10% of its body weight for the risk of water intoxication to occur. In a study of 15 babies below the age of 6 months, undertaking a 20 minute swimming session consisting of between 5 and 10 submersions, 7 of the babies increased their body weight by a maximum of 1.6%.*

3.10 COSHH – Use of chemicals

The Control of Substances Hazardous to Health Regulations (NI) 2000 (COSHH) is the primary piece of legislation relating to the use of chemicals. It provides specific requirements to be considered when assessing hazardous substances.

Swimming pool chemicals include various kinds of disinfectants and sanitizers, which work to control the growth of certain kinds of algae and bacteria in the pool water. Swimming pool chemicals may also be used in hot tubs, spas, wading pools, and whirlpools.

Typical chemicals used in the swimming pool include

- Chlorine – in tablet form in small pools however chlorine gas may be used in large pools.
- Bromine
- Ozone



Swimming pool chemicals can also be oxidizers and corrosives.

- Oxidizing liquids and solids can be severe fire and explosion hazards. Bromine and fluorine are also oxidizers.
- Corrosives are materials that can attack and chemically destroy body tissues on contact; corrosives can also damage or destroy metal.

Swimming teachers have no requirement to be using chemicals however may have direct contact with them when entering plant rooms and pool storage areas. Teachers should therefore be aware of the location of chemicals, warning signs in place, first aid boxes and eye wash stations, these details are provided in the relevant NOP & EAP for each pool in which they are teaching. Teachers must also be aware that an accidental release of chlorine gas in a swimming pool can be potentially fatal and therefore be aware of the procedures to be followed.

In the event that a swimming teacher has any concerns regarding chemicals the teacher must initially contact a member of staff responsible for the pool. The contacts are as detailed:

- Bushtown Hotel – Duty Manager
- Coleraine Grammar– Caretakers on duty / School Bursar
- Anchor House, Donaghmore – Des Cossum 028 9448 7110 / Craig (owner)
- Toomebridge, Airfield Road - Des Cossum 028 9448 7110 / Sean (owner)

If a fire breaks out, leave the area and call the Northern Ireland Fire & Rescue Service. Any spills larger than 50 kg should be handled as an emergency and the fire department called immediately, if in doubt of what to do, call the Northern Ireland Fire & Rescue Service for advice.

All teachers are trained to a minimum level of emergency first aid procedures and should treat injuries as appropriate.

Safety data sheets are written by suppliers and provide information on the hazards e.g. health effects and detail what to do in an emergency.

3.11 Lone Working

On occasions teachers will be working alone when teaching lessons or opening and locking up, while it is not possible to eliminate lone working when carrying out lessons, the number of occurrences is, where possible kept to a minimum. Specific risks have been identified in the risk assessments however general precautions to be taken by staff include:

- Where a staff member perceives a risk while lone working they should leave the premises immediately.
- Teachers should where possible keep mobile telephones close to the poolside while lone working for teacher use in the case of an emergency.
- Teachers should notify the owner of any work outside normal working hours

Teachers must consider child protection when working alone; refer to the child protection policy for further information.

3.12 Child Protection

Cossum swim schools staff are expected to be familiar, and comply with the STA's child protection policy (Appendix 1) and in the case of suspected incidents of abuse or concerns about children report these to the STA using the STA's Safeguarding & Protecting Children incident report form (Appendix 2).



Duty of Care

THE DUTIES AND RESPONSIBILITIES OF THE MEMBERS OF THE SWIMMING TEACHERS' ASSOCIATION

- Code of Ethics and Professional Conduct
- Child Protection Procedures

The Swimming Teachers' Association
Anchor House, Birch St,
Walsall, West Midlands. WS2 8HZ
Tel: 01922 645097 Fax: 01922 720628
E-mail: sta@sta.co.uk
www.sta.co.uk

**NSPCC Child Protection Helpline
0808 800 5000 (24 hour service)**

Code of Ethics and Professional Conduct

1. Safety

- 1.1. The paramount consideration of all members at all time is safety:
 - Safety of pupils.
 - Safety of clients.
 - Safety of the general public.
 - Safety of the member.
- 1.2. Members must ensure that all reasonable steps are taken to provide a safe environment and all activities are in accordance with the appropriate regulations, or best practice if there are no regulations, and be appropriate for the age, experience and ability of the participants.

2. General

- 2.1. Members must respect the rights, dignity and worth of every person and treat everyone accordingly at all times.
- 2.2. Members must abide by the Equal Opportunities Policy of the Association; the Swimming Teachers' Association will not condone or permit harassment or discrimination on the grounds of sex, race, colour, nationality, national or ethnic origin, marital status, sexual orientation, age, disability, political or religious belief.
- 2.3. Child abuse is a criminal act, which will not be tolerated by the Association. Members should be fully aware of the Child Protection Procedures set out on pages 4 to 10.
- 2.4. Members, when acting in a professional capacity, must display the highest standards of behaviour and appearance and must adhere to all STA policies.
- 2.5. Members inevitably gather a great deal of personal information about pupils in the course of a working relationship. Members and pupils must reach agreement as to what is regarded as confidential information, i.e. not divulged to a third party without the express approval of the pupil. Confidentiality does not preclude the disclosure of information where the Member is in an alleged breach of this Code of Ethics.
- 2.6. Advertising by Members in respect of qualifications or services shall be accurate and professionally restrained and shall not display affiliation with an organisation that falsely implies sponsorship or accreditation by that organisation.
- 2.7. Members should refrain from public criticism of fellow Members, differences of opinion should be dealt with on a personal basis and more serious disputes should be referred to the STA.
- 2.8. Members should regularly seek ways of increasing their professional development and self-awareness, should welcome evaluation of their work by colleagues and be able to account to pupils, employers and colleagues for their actions.
- 2.9. Members should only act within their qualification.
- 2.10. Members should ensure that they have adequate Public Liability insurance. Fully paid up members are insured by the Association provided that they act within their qualification; if a member acts outside their qualification they may not be covered for insurance.
- 2.11. All members who work with children or vulnerable adults must obtain a CRB clearance. Many employers

provide clearance as part of the employment process. If you are not CRB checked by your employer the STA can provide a CRB clearance; subject to CRB regulations and payment of the relevant fee.

- 2.12. All Members who employ staff to work with children or vulnerable adults must obtain a CRB clearance for their staff.
 - ❖ In 2.11 and 2.12 CRB means **Criminal Records Bureau** in England & Wales, **Disclosure Scotland** in Scotland and **Data Protection Unit** in Northern Ireland; see page 9 for contact details.

3. Swimming and Lifeguard/First Aid Teachers

When acting as teachers of swimming, lifeguarding or first aid:

Members must place the well being and safety of the pupils/ candidates within the class/ course above the development of performance. They should follow all guidelines laid down by the governing bodies, Leisure Centres, Local Authorities or such other bodies who control swimming lessons/ courses.

- 3.1. Members must develop an appropriate working relationship with their pupils/ candidates, based on mutual trust and respect.
- 3.2. Members must encourage and guide their pupils/ candidates throughout each lesson/ course.
- 3.3. Members, who teach swimming, lifeguarding or first aid, must hold a recognised teaching qualification.
- 3.4. Members must ensure that the activities they direct are appropriate for the age, maturity, experience and ability of the pupils/ candidates.
- 3.5. Members should at the outset, clarify with pupils/ candidates (and where appropriate with their guardians), exactly what format the lessons/ course will take and what is expected of the pupil/ candidate. They should also clarify what fees, if any, are payable.
- 3.6. Members should co-operate fully with others involved in the lessons/ course (e.g. Pool Management, other teachers) in the best interests of the pupil/ candidate.
- 3.7. Members who run training courses under the auspices of the Association must comply with the appropriate rules and regulations of the Association.
- 3.8. Members who receive fees or other monies from candidates or pupils must keep proper accounts. Any fees collected that are due to the Association must be paid over promptly.

4. Violations of the Code of Ethics and Professional Conduct

- 4.1. Allegations that a Member has breached any of the articles of the Code of Ethics and Professional Conduct must be made in writing to the Chief Executive of the STA. The Board of Trustees will consider any such complaint in accordance with Articles of Association of the STA, clauses 2.10 to 2.19. The powers contained under these clauses include suspension from and exclusion from membership of the STA.
- 4.2. Where the complainant alleges that a Member may be in breach of the STA's Child Protection Policy, the member **WILL BE** suspended from membership pending a full investigation.
- 4.3. A Member found guilty under article 4.2 will be permanently excluded from membership of the Association.

Child Protection Procedures

It is widely accepted that it is the responsibility of every adult to protect children from abuse. Child abuse and particularly child sexual abuse can arouse strong emotions in those facing such a situation and it is important to understand these feelings and not allow them to interfere with your judgement about any action to take.

Abuse can occur within many situations including the home, school and the sporting environment. Some individuals will actively seek employment or voluntary work with children in order to harm them. Everyone working in swimming either in a paid or voluntary capacity, together with those working in affiliated organisations has a role to play in safeguarding the welfare of children and preventing their abuse.

A swimming teacher, lifeguard, lifesaver, or volunteer may have regular contact with children and be a very important link in identifying cases where a child needs protection. When establishing guidelines concerning the protection of children, it is important to recognise that the organisation has both a moral and possibly a legal obligation to ensure that when it is given responsibility for children, it provides them with the highest possible standard of care.

The Swimming Teachers' Association recognises that they have a responsibility to:

- Safeguard and promote the interests and well-being of children with whom it is working;
- Take all reasonable practical steps to protect them from harm, discrimination, or degrading treatment;
- Respect their rights, wishes and feelings.

Child protection procedures can:

- Offer safeguards to the children with whom we work, and to our members of staff, volunteers and those in affiliated organisations;
- Help to maintain the professionalism and the standards of practice that are associated with the members of the STA.

We recognise that any procedure is only as effective as the ability and skill of those who operate it. We are committed to:

- Proper recruitment policies;
- The provision of support and appropriate training;
- Clear processes for recognition and responding to concerns;
- Working together with parents/carers and other organisations to ensure that the needs and the welfare of children remain paramount.

Principles

- The child's welfare is paramount.
- All children whatever their age, culture, disability, gender, language, racial origin, religious belief and/or sexual identity have the right to protection from abuse.
- All suspicions and allegations of abuse will be taken seriously; and responded to swiftly and appropriately.
- Anyone under the age of 18 years (under 16 years in Scotland) should be considered as a child for the purposes of this document.

Working in partnership with children and their parents/carers is essential for the protection of the children.

The STA recognises the statutory responsibility of the Social Services Department to ensure the welfare of children and is committed to working together with the local Area Child Protection Committee (ACPC) and to complying with its procedures.

Recognition of Abuse

Even for those experienced in working with child abuse, it is not always easy to recognise a situation where abuse may occur or has already taken place. The STA acknowledges that their staff, whether in a paid or voluntary capacity, are not experts at such recognition. It therefore expects them to discuss any concern they may have about the welfare of a child immediately with the person in charge, as follows:

Working within a Club

- If you are working within a swimming club, you should inform the person in charge of the club. If you are the head teacher/coach within the club then you will need to inform the club Chairman/President.

Working with Schools

- If you are working with schools as part of the school curriculum you should inform Head Teacher of the school.

Working within a Local Authority Swim Scheme (or similar)

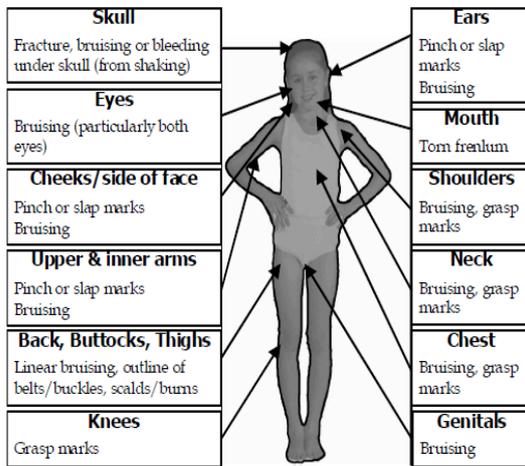
- If you are working within a swim scheme you should inform the manager of the pool.

Working with Swimmers Away From Home

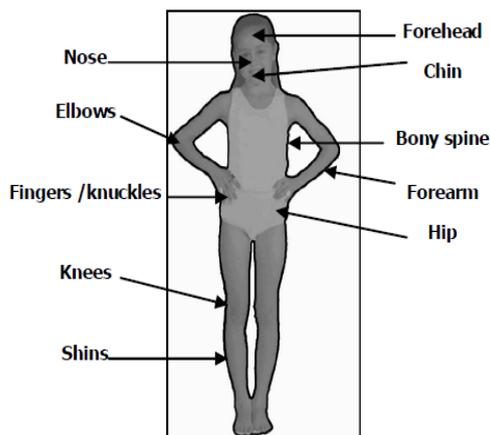
- If you are working with swimmers away from home (for example on Training Camps), then you should inform the Team Manager or Head Coach.

4 Duty of Care

Common sites for Non-Accidental Injuries



Common sites for Accidental Injuries



It is the responsibility of these people to ensure that appropriate advice is obtained from the local Social Services Department or the NSPCC. (Also see the section "Responding to Suspicions or Allegations of Child Abuse" on page 5, which details exactly what action to take.) If the person in charge is not available, or the concern is about the person in charge, the person in receipt of the information will contact the Social Services Department direct.

Indications that a child is being abused would include:

- 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;
- The child describes what appears to be an abusive act involving him/her;
- Someone else - a child or adult - expresses concern about the welfare of another child;
- Unexplained changes in behaviour, e.g. becoming very quiet, withdrawn, or displaying sudden outbursts of temper;
- Inappropriate sexual awareness;

- Engages in sexually explicit behaviour in games;
- Is distrustful of adults, particularly those with whom a close relationship will normally be expected;
- Has difficulty in making friends;
- Is prevented from socialising with other children;
- Displays variations in eating patterns including overeating or loss of appetite;
- Loses weight for no apparent reason;
- Becomes increasingly dirty or unkempt.

It must be recognised that the above list is not exhaustive and 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 swimming to decide that child abuse is occurring, but it is their responsibility to act on any concerns. (See section "Responding to Suspicions or Allegations of Child Abuse" on page 5).

The Main Forms of Abuse

Physical Abuse

Where adults, or young people, physically hurt or injure children by hitting, shaking, squeezing, burning and biting or by giving children alcohol, inappropriate drugs or poison. Attempted suffocation or drowning also comes within this category.

In sports situations, physical abuse might occur when the nature and intensity of training disregard the capacity of the child's immature and growing body.

Sexual Abuse

Girls and boys are abused by adults, both male and female, and by other young people who use children to meet their own sexual needs. This could include full sexual intercourse, masturbation, oral sex, anal intercourse, fondling. Showing children pornographic material is also a form of sexual abuse as may be the taking of inappropriate photographs of children.

Swimming or related activities, which might involve physical contact with children, could potentially create situations where sexual abuse may go unnoticed. Also the power of the coach over young athletes, if misused, may lead to abusive situations developing.

Emotional Abuse

Persistent lack of love and affection, where a child may be constantly shouted at, threatened or taunted which may make the child very nervous and withdrawn. Emotional abuse also occurs when there is constant overprotection, which prevents children from socialising.

Emotional abuse in sport might include situations where children are subjected to unrealistic pressure by the parent or coach, or bullied in order to consistently perform to high expectations.

Neglect

Where adults fail to meet a child's basic needs like food or warm clothing. Children might also be constantly left alone or unsupervised. Adults may also fail to, or refuse to, give children love and affection; this could be seen to be emotional neglect.

Neglect in a sport situation could include a teacher or coach not ensuring children are safe, or exposing them to undue cold.

The Effects of Abuse

Abuse in all its forms can affect a child at any age. The effects can be so damaging, that if not treated, they may follow an individual into adulthood. For example, an adult who has been abused as a child may find it difficult, or impossible, to maintain a stable, trusting relationship; may become involved with drugs or prostitution; may attempt suicide, or may abuse a child in the future and find successful parenting difficult.

There have been a number of studies¹ which suggest children with disabilities are at increased risk of abuse through various factors such as stereo-typing, prejudice, discrimination, isolation, and a powerlessness to protect themselves, or to adequately communicate that abuse has occurred. Children from ethnic minorities, who may also be experiencing racial discrimination, may be doubly powerless.

Listening to the Child

If a child says or indicates that he or she is being abused, or information is obtained which gives concern that a child is being abused, the person receiving this information should:

- React calmly so as not to frighten the child;
- Tell the child they are not to blame and that it was right to tell someone;
- Take what the child says seriously, recognising the difficulties inherent in interpreting what is said by a child who is very young, has a speech disability and/or differences in language;
- Keep questions to the absolute minimum necessary to ensure a clear and accurate understanding of what has been said;
- Reassure the child, but do not make promises of confidentiality which might not be feasible in the light of subsequent developments;
- Make a full record of what had been said, heard and/or seen as soon as possible.

Responding to Suspicions or Allegations of Child Abuse

It is not the responsibility of a Member of the STA to take responsibility or to decide whether or not child abuse is taking place. There is however, a responsibility to report concerns so that appropriate agencies can then make inquiries and take any necessary action to protect the child.

The Social Services Department has a statutory duty under the Children Act 1989 to ensure the welfare of a child. When a child protection referral is made, its staff have a legal responsibility to investigate. This may involve talking to the child and family and gathering information from other people who know the child. Inquiries may be carried out jointly with the police.

What to do if there are concerns

1. There is always a commitment to work in partnership with parents or carers where there are concerns about their children. Therefore, in most situations, it would be important to talk to parents or carers to help clarify any initial concerns. For example, if a child seems

withdrawn, they may have experienced bereavement in the family.

2. **However**, there are circumstances in which a child might be placed at even greater risk were such concerns to be shared, e.g. where a parent or carer may be responsible for the abuse or not able to respond to the situation appropriately.
3. In these situations, or where concerns still exist, any suspicion, allegation, or incident of abuse must be reported to the person in charge as soon as possible, and recorded. (See section "Recognition of Abuse" on page 3).
4. It is the responsibility of the person in charge to inform the Social Services Department without delay. If a person in charge is not available, the person discovering or being informed of the abuse should immediately contact the Social Services Department or the police. If you're not sure about what to do, you can also obtain advice by telephoning:

**NSPCC Child Protection Helpline
0800 800 5000 (24 hour service)**

Recording and Information

Information passed to the Social Services Department or the police must be as helpful as possible, hence the necessity for making a detailed record. Information should include the following:

- The nature of the allegation;
- A description of any visible bruising or other injuries;
- The child's account, if he or she can give them, of what has happened and how any bruising or other injuries occurred;
- Any times, dates, or other relevant information;
- A clear distinction between what is fact, opinion, or hearsay.
- Reporting the matter to the police or Social Services Department should not however be delayed by attempts to obtain more information.
- Wherever possible, referrals telephoned to the Social Services Department should be confirmed in writing within 24 hours. A record should also be made of the name and designation of the Social Services Department's member of staff or police officer to whom the concerns were passed, together with the time and date of the call, in case any follow-up is needed.

Allegations of Abuse against Members of the STA

This would include anyone working with children in a paid or voluntary capacity. For example, volunteers in clubs, club helpers, tutors on training camps, lifeguards and swimming teachers.

Child abuse can and does occur outside the family setting. Although it is a sensitive and difficult issue, child abuse has occurred within institutions and may occur within other settings, for example, in sport or other social activities. Recent inquiries indicate that abuse, which takes place within a public setting, is rarely a one-off event. It is crucial that those involved in swimming are aware of this possibility and that all allegations are taken seriously and appropriate action taken.

6 Duty of Care

The person in charge may be informed of situations where they are unsure about whether the allegation constitutes abuse or not, and are therefore unclear about what action to take. There may be circumstances where allegations are about poor practice rather than abuse but those responsible should always consult with senior colleagues and gain advice from social services, or the NSPCC where there is any doubt. This is because this may be just one of a series of other instances which together cause concern. It is acknowledged that feelings generated by the discovery that a member of staff or volunteer is, or may be abusing a child, will raise concerns among other staff or volunteers, including the difficulties inherent in reporting such matters. However, it is important that any concerns for the welfare of the child arising from abuse or harassment by a member of staff or volunteer should be reported immediately.

The STA would want to assure all staff and Members that it would fully support and protect anyone who, in good faith, reports his or her concern that a colleague is, or may be, abusing a child.

Where there is a complaint of abuse against a member of staff, there may be three types of investigation:

1. A criminal investigation
2. A child protection investigation
3. A disciplinary or misconduct investigation

The results of the police and social services investigation may well influence the disciplinary investigation, but not necessarily.

- If, following consideration the allegation is clearly about poor practice then the STA will deal with this as a misconduct issue.
- Any suspicion that a child has been abused by a Member will be reported to a person in charge who will take such steps as he or she considers necessary to ensure the safety of the child in question and any other child who may be at risk.
- The person in charge will refer the allegation to the Social Services Department who may involve the police.
- The parents or carers of the child will be contacted as soon as possible following advice from the Social Services Department.
- The person in charge should also notify the Chief Executive of the STA.
- Every effort should be made to ensure that confidentiality is maintained for all concerned.
- If the person in charge is the subject of the suspicion/allegation and is a Member of the STA, the report must be made to the STA who is then responsible for taking the action outlined above.
- Irrespective of the findings of the Social Services Department or police inquiries, the STA must assess all individual cases under the appropriate misconduct/disciplinary procedure, to decide whether a Member should be reinstated and how this can be sensitively handled. This may be a difficult decision, particularly where there is insufficient evidence to uphold any action by the police. In such cases, the STA will reach a

decision based upon the information that is available which could suggest that on a balance of probability it is more likely than not that the allegation is true. The welfare of children should always remain paramount.

- Consideration should be given to what support may be appropriate to children, parents and members of staff.

Allegations of Previous Abuse

Allegations of abuse may be made some period of time after the event. For example, by an adult who was abused as a child by a member of staff who is still currently working with children. Where such an allegation is made, the organisation should follow the procedures given above and report the matter to the Social Services Department or the police. This is because other children, either within the sport or outside it, may be at risk from this person. Anyone who has a previous criminal conviction for offences related to abuse is automatically excluded from working with children.

Prevention

All children have a right to be safe and to be treated with dignity and respect.

Basic guidelines will help safeguard children, staff, volunteers and the organisation concerned and reduce the risk of allegations being made. These are listed below.

Recruitment and Selecting Staff and Volunteers

Anyone may have the potential to abuse children in some way and it is important that all reasonable steps are taken to ensure that unsuitable people are prevented from working with children. It is essential the same procedure is used consistently whether staff be paid or unpaid in part-time or full-time occupation.

When undertaking pre-selection checks the following should be included:

- All volunteers and staff working for a club should complete an application form.
- Application forms should be designed to elicit information about an applicants past career (including any gaps), and to establish any criminal record.
- Consent should be obtained from applicants for police and social services checks.
- At least two references should be taken up, including at least one regarding previous work with children.
- Clubs and employers should have effective measures in place to ensure the confidentiality of information received in relation to applicants is treated with the strictest of confidence.
- All volunteers and employees should sign a Child Protection Protocol.
- All volunteers and employees should be checked with the following organisations who maintain information about individuals who are deemed unsuitable to work with children:

England & Wales:	Scotland:	Northern Ireland:
CRB	Disclosure Scotland	Data Protection Unit
0870 9090811	0870 6096006	02890 650222

Policy and Procedure

To help prevent abuse of children the club or organisation should have a policy which ensures that children are protected and kept safe from harm. Everyone involved in the care of children should know what to do if there are concerns about abuse and where procedures are kept.

Training and Seminars

It should be recognised that checks are only part of the process to protect children from possible abuse by members of staff. They should receive appropriate ongoing training and attend suitable seminars undertaken by experienced deliverers so that they are aware and sensitive to potentially abusive situations.

Supervision

Managers should be sensitive to any concerns about abuse or not adhering to good practice as set out below, and act on them at an early stage. They should also offer appropriate support to those who report concerns.

Complaints

The Management Committee of all clubs will ensure that there is a well established complaints procedure in operation and that parents and their children have the relevant information that will allow easy access to this procedure.

Good Practice in the Care of Children

You can reduce situations for the abuse of children and help to protect staff and volunteers by promoting good practice. The following are more specific examples of care which should be taken when working within a swimming context:

- Always be publicly open when working with children. Avoid situations where a teacher/coach and individual swimmers are completely unobserved;
- Where any form of manual support is required, this should be provided openly. The teacher should also be extremely careful as it is difficult to maintain hand positions when the child is constantly moving. The views of parents / guardians should always be carefully considered;
- Where possible parents / guardians should take on the responsibility for their children in the changing rooms. Where classes have to be supervised in the changing rooms, always ensure that teachers/coaches work in pairs. Encourage an open environment, e.g. no secrets;
- Do not take children alone in a car on journeys, however short.

Where cases arise where it is unavoidable that these things do happen, they should only occur with the full knowledge and consent of someone in charge in the organisation, or the child's parents.

And you should never:

- Engage in rough, physical or sexually provocative games, including horseplay.
- Share a room with a child.
- Allow or engage in inappropriate touching of any form.
- Allow children to use inappropriate language unchallenged.
- Make sexually suggestive comments to a child, even in fun.

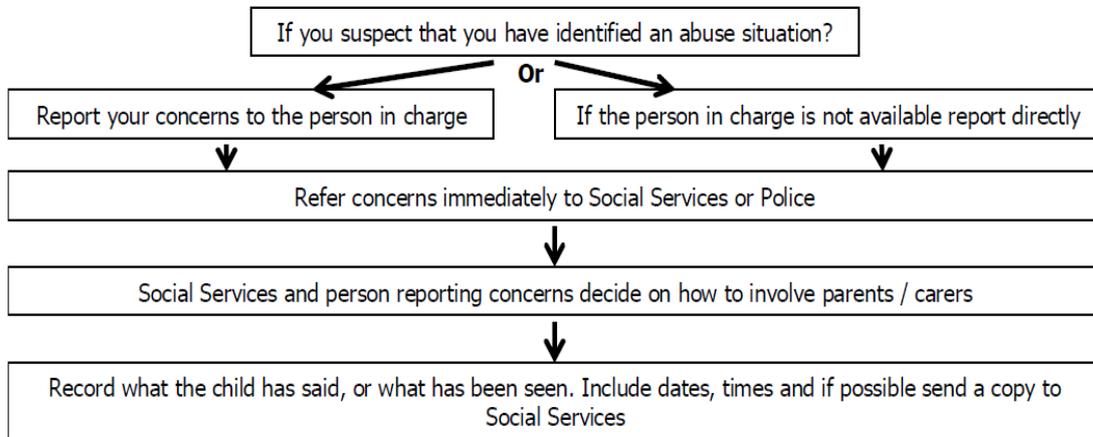
- Let allegations a child makes go unrecorded, or not acted upon.
- Do things of a personal nature that children can do for themselves.
- Have children stay at your home with you unsupervised.
- Spend excessive amounts of time alone with children away from others.
- Take children to your home where they will be alone with you.
- Take still or movie photographs of children without obtaining the guardians consent in writing.

It may be sometimes necessary for staff or volunteers to do things of a personal nature for children, particularly if they are young or are children with disabilities. These tasks should only be carried out with a full understanding and written consent of parents and of the children involved. There is a need to be responsive to a child's reactions and if a child is fully dependent upon you, talk with them about what you are doing and give them choices where possible. This is particularly so if you are involved in any dressing, or undressing of outer clothing, or where there is physical contact of lifting or assisting a child to carry out particular activities.

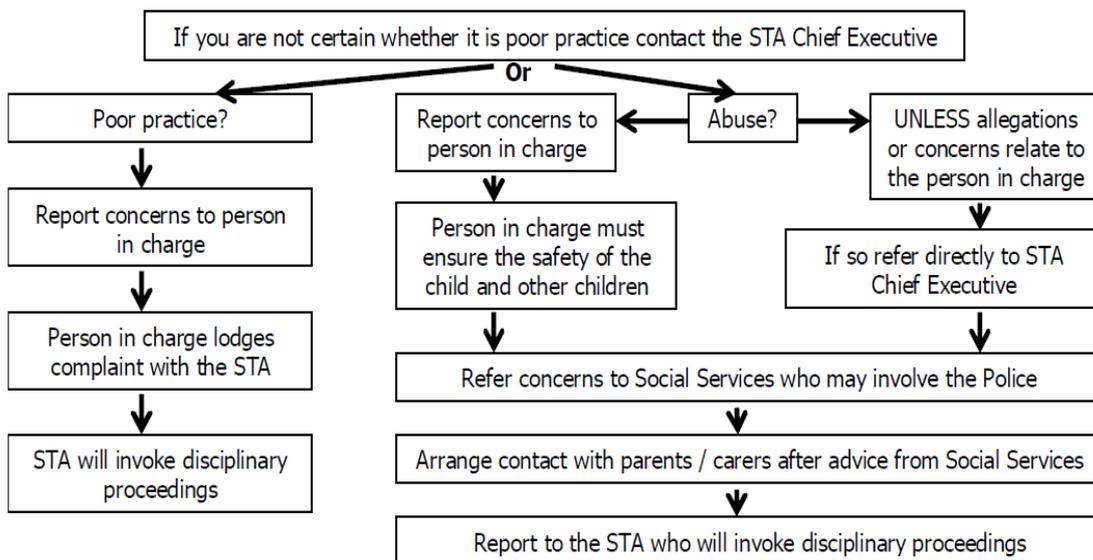
If during your care of a child you accidentally hurt them, the child seems distressed in any manner, appears to be sexually aroused by your actions, or misunderstands or misinterprets something you have done, report any such incident as soon as possible to another colleague and make a brief written note of it. Parents or carers should be informed of the incident.

The STA acknowledge the help provided by NSPCC and ASA in producing these procedures.

What to do if you have concerns about child abuse



What to do if you have concerns about child abuse by a member of the STA



Appendix 2

STA Safeguarding & Protecting Children

INCIDENT REPORT FORM

Thank you for identifying that you have concerns about a child or children in your care, it is not always easy to report an incident, and we would like you to know that this form will be treated in **STRICTEST CONFIDENCE**. Please complete this form with as much detail as possible, using additional sheets of paper if necessary to complete your report.

Name & Contact Details of Person(s) Completing this Report		Date of Incident	Date of Report
Please answer the questions below giving as much detail as possible	Y/N		
Are you or anyone involved an STA Member?		If Y, please give the member's name	
As the person making the report, did you witness the incident directly?		If Y, please give details of time & date of incident	
Were there any witnesses to the incident?		If Y, please give their name & contact details	
Do you know the person(s) about whom the allegation is being made?		If Y, please state relationship (e.g colleague, partner etc..)	
As the person making the report, did someone else make an allegation?		If Y, please give the name & address of the person making the allegation	
As the person making the report, has a child made a disclosure to you?		If Y, please give details of the time & date of the disclosure	
Have you discussed this incident with anyone else?		If Y, please give the name & address of all who have been informed	
Have you contacted the child's parents / legal guardian?		If Y, please give the parents name & address	
Has the child been offered / received medical care?		If Y, please give details	
Have social services, the police or the NSPCC been contacted by you or anyone else?		If Y, please give name & contact details	
In the space provided below, please give as much detail about the incident, disclosure or allegation as you can. (If you need more space, please continue to type and space will become available)			

Name of Person(s) about whom this report is being made	
Address of Person(s) about whom this report is being made	
Date of Birth (if known) of person(s) about whom this report is being made	
Name & Address of Alleged Victim	
Date of Birth of Alleged Victim	
<p>I understand the information given above is correct to the best of my knowledge, and that any information disclosed in good faith will be treated in the strictest confidence. I also acknowledge that malicious allegations may result in prosecution.</p> <p>Signed :</p> <p>Date of signing :</p>	

You should now send this form to ; STA Child Protection Officer, STA, Anchor House, Birch Street, Walsall, West Midlands, WS2 8HZ.

N.B An electronic copy can be sent immediately to; childprotection@sta.co.uk