



Elmbridge Phoenix Swimming Club

Safeguarding Policy

Document Control

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1.0	22/07/2026	EPSC Executive Committee	22/07/2027



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1. Overview and Commitment

1.1 Our Commitment

Elmbridge Phoenix Swimming Club is committed to ensuring the safety, well-being, and protection of all swimmers, particularly children and vulnerable adults. We recognise that safeguarding is everyone's responsibility.

1.2 Policy Framework

This policy operates within the framework of:

- Swim England's Wavepower 2024-2028 Safeguarding Policy
- The Children Act 1989 and 2004
- The Care Act 2014
- Working Together to Safeguard Children (2023)
- Data Protection Act 2018 and UK GDPR

1.3 Scope

This protocol applies to:

- All club members (swimmers of all ages)
- Coaches, teachers, and volunteers
- Committee members
- Parents, carers, and spectators
- Any activities organised under the club's name

2. Key Definitions

Safeguarding means protecting children and vulnerable adults from maltreatment, preventing harm to their health or development, and ensuring they grow up in safe and caring circumstances.

Child: Anyone under the age of 18 years.



Vulnerable Adult: A person aged 18 or over who may be unable to protect themselves from harm or exploitation due to disability, illness, or other circumstances.

Abuse: Physical, emotional, sexual abuse, neglect, or bullying (including online).

Disclosure: When someone shares information about abuse or harm, either about themselves or another person.

Concern: Any worry or suspicion that a child or vulnerable adult may be at risk of harm.

3. Roles and Responsibilities

3.1 Club Welfare Officer

Responsibilities:

- Act as the designated safeguarding lead for the club
- Conduct initial assessments of all welfare concerns within **24 hours** of notification
- Determine appropriate action (informal resolution, formal reporting, or referral to authorities)
- Liaise with Swim England Safeguarding Team and statutory agencies
- Maintain confidential records of all concerns and actions
- Coordinate safeguarding training across the club
- Submit annual safeguarding report to the committee
- Attend Swim England safeguarding updates and maintain valid certification

3.3 Head Coach

Responsibilities:

- Ensure all coaching staff understand and follow safeguarding procedures
- Create a safe training environment
- Monitor coach-swimmer interactions
- Report concerns immediately to the Welfare Officer
- Ensure all coaches maintain valid DBS checks and safeguarding training
- Refer all concerns to the Welfare Officer and refrain from conducting independent investigations



3.4 Coaches/Teachers

Responsibilities:

- Maintain professional boundaries at all times
- Be vigilant for signs of distress, discomfort, or unusual behaviour
- Listen empathetically if approached by a swimmer
- **Immediately refer all concerns** to the Welfare Officer (within same session or within 24 hours maximum)
- Avoid making assurances of absolute confidentiality and communicate confidentiality limits in line with policy
- Ensure that safeguarding matters are referred promptly to the Welfare Officer and are not independently investigated or resolved
- Inform their line manager when referring concerns
- Document what they have observed or been told
- Maintain confidentiality (discuss only with Welfare Officer)

3.5 Committee Members

Responsibilities:

- Ensure the club has adequate safeguarding policies and procedures
- Ensure Welfare Officers are appointed, trained, and supported
- Allocate budget for safeguarding training and DBS checks
- Review safeguarding reports and implement recommendations
- Support the Welfare Officer with difficult decisions when required

3.6 Parents and Carers

Responsibilities:

- Share relevant information about their child's needs or circumstances
- Communicate concerns promptly to the Welfare Officer
- Support the club's safeguarding measures
- Model respectful behaviour
- Follow the club's Code of Conduct

3.7 All Club Members

Everyone has a responsibility to:

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- Treat others with respect and dignity
- Report concerns, however minor they may seem
- Cooperate with safeguarding procedures
- Maintain appropriate boundaries

4. Recognising Concerns

4.1 Types of Concerns

Low-Level Concerns (may be resolved informally):

- Minor disagreements between swimmers
- One-off inappropriate language
- Concerns about coaching methods (not abusive)
- Swimmer appearing withdrawn after friendship issues

Medium-Level Concerns (require formal documentation and monitoring):

- Repeated low-level incidents
- Pattern of concerning behaviour
- Persistent bullying
- Significant changes in behaviour or performance
- Physical indicators (unexplained bruises, weight changes)

High-Level Concerns (require immediate action and likely external referral):

- Disclosure of abuse (any form)
- Allegations of physical, sexual, or emotional abuse
- Evidence of serious neglect
- Serious bullying or harassment
- Grooming behaviours
- Self-harm or suicidal ideation
- Radicalisation concerns
- Child sexual exploitation indicators

4.2 Signs to Be Aware Of



Physical indicators: Unexplained injuries, frequent "accidents", neglected appearance, inappropriate clothing for weather, frequent hunger

Behavioural indicators: Sudden changes in behaviour, withdrawal, aggression, fear of specific people, sexual knowledge inappropriate for age, regression

Emotional indicators: Low self-esteem, excessive attention-seeking, self-harm, depression, anxiety

Remember: These signs don't always indicate abuse, but they warrant attention and appropriate response.

5. Reporting Procedures

5.1 Reporting Timeline

Immediate Action Required (within the session):

- If a child is in immediate danger
- If there's a disclosure of serious abuse
- If there are injuries requiring medical attention

Same Day Reporting (within 24 hours):

- All other safeguarding concerns must be reported to the Welfare Officer

Emergency Protocol: If immediate danger exists and the Welfare Officer cannot be reached:

1. Call 999 (police/ambulance) if required
2. Contact Club Chair/Co-chair
3. Document everything and report to Welfare Officer as soon as possible

For the step-by-step process, see [Appendix B: Reporting Procedures Step-by-Step](#).

6. Record-Keeping and Confidentiality



6.1 Documentation Requirements

All safeguarding concerns must be documented, regardless of outcome.

Records must include:

- Initial concern report (date, time, and location)
- Assessment notes (what was said, using the person's exact words in quotation marks)
- Actions taken and by whom
- Communications (dates, times, people contacted)
- Decisions made and rationale
- Outcome and follow-up actions

6.2 Storage and Retention

Storage:

- All safeguarding records are digital and stored in the cloud
- Digital records are password-protected
- Access is limited to Welfare Officer

Retention Period:

- Records retained until the individual reaches **25 years of age**, or
- For vulnerable adults: **7 years** after case closure
- After this period, records securely destroyed (shredded/digital deletion)

6.3 Confidentiality Principles

Information is shared on a "need to know" basis only.

Who needs to know:

- Welfare Officer (always)
- Statutory agencies (if referred)
- Swim England (as required)
- Club Chair/Co-chair (for serious matters)
- Person who reported (limited update on outcome)

Who does NOT need to know:

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- Other coaches or volunteers (unless essential for safety)
- Other swimmers or families
- Committee members (unless absolutely necessary)

Exception: Information must be shared when required to protect a child, even if confidentiality has been requested.

6.4 Data Protection

All personal data is processed in accordance with The UK GDPR and Data Protection Act 2018. Safeguarding is a lawful basis for processing sensitive personal data.

7. Training Requirements

7.1 Mandatory Training

Role	Training Required	Frequency
Welfare Officer	Swim England Safeguarding & Protecting Children (SPC) Course	Every 3 years
Coaches	Swim England Safeguarding Awareness Workshop	Every 3 years
Committee Members	Safeguarding Awareness (online)	Every 3 years
Regular volunteers	Safeguarding Awareness	Every 3 years

7.2 DBS Checks

Role	Level	Renewal
Welfare Officers	Enhanced with Barred List	Every 3 years



Coaches	Enhanced with Barred List	Every 3 years
Committee Members	Basic or Enhanced (depending on role)	Every 3 years
Regular volunteers	Enhanced (if in regulated activity)	Every 3 years

All individuals must hold a current, valid DBS check before undertaking any regulated activity with children. Under no circumstances may anyone begin such work without this clearance.

7.3 Induction Process

All new staff/volunteers receive:

- Copy of this Safeguarding Protocol
- Code of Conduct
- Contact details for Welfare Officers
- Confirmation of DBS check status
- Date of safeguarding training
- Signed acknowledgement (kept on file)

8. Related Policies

This protocol should be read alongside:

- **Code of Conduct** (for coaches, swimmers, parents, spectators)
- **Anti-Bullying Policy**
- **Photography and Filming Policy**
- **Social Media Policy**
- **Changing Room Supervision Policy**
- **Away Trips and Competitions Policy**
- **Recruitment and Selection Policy**
- **Whistleblowing Policy**
- **Data Protection Policy**
- **Complaints and Discipline Procedures**

All policies available at: www.elmbridgephoenix.com

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9. Contact Information

9.1 Internal Contacts

Role	Name	Email
Welfare Officer	Kelly Cheney	welfare@elmbridgephoenix.com
Chair	Cecile Stearn	chair@elmbridgephoenix.com
Vice Chair	Karina Kajelova	vicechair@elmbridgephoenix.com
Secretary	Celia Benham	secretary@elmbridgephoenix.com
Head Coach	Carmen Georgescu-Spiers	headcoach@elmbridgephoenix.com

9.2 External Contacts

Organisation	Contact	Phone	Email/Website
Swim England Safeguarding Team	Swim England	01509 640 230	wavepower@swimming.org
Local Authority Designated Officer (LADO) (Office Hours)	Surrey	0300 123 1650	
Children's Social Care (Office Hours)	Surrey	0300 470 9100, option 3	cspa@surreycc.gov.uk
Police (Non-Emergency)		101	-
Police (Emergency)		999	-
NSPCC Helpline		0808 800 5000	help@nspcc.org.uk
Childline		0800 1111	www.childline.org.uk

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11. Appendices

Appendix A: Specific Safeguarding Scenarios

Allegations Against Staff or Volunteers

Immediate Actions:

1. Report to Welfare Officer immediately
2. Welfare Officer contacts LADO within **24 hours**
3. Individual suspended from duties pending investigation
4. No contact with the complainant
5. No discussion of allegations with colleagues
6. Full cooperation with external investigation

Never attempt to investigate internally first.

Concerns Identified by External Agencies

If another organisation (school, social services) is already involved:

- Welfare Officer liaises with the external agency
- Confirm what information can be shared
- Avoid duplication but ensure communication
- Offer club's support and cooperation
- Adjust club arrangements as needed (e.g., separate training times)

Parental/Carer Concerns

If concerns arise about a parent/carer's behaviour:

- Assess risk to the child
- Consider whether this affects the child at the club
- May require referral to social services
- Handle sensitively but prioritise child safety

Peer-on-Peer Abuse

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When concerns involve swimmers harming other swimmers:

- Take allegations seriously
- Both parties are safeguarded (alleged victim and perpetrator)
- May require separate training arrangements
- Consider police involvement depending on severity
- Support plans for both individuals

Online Safety Concerns

Including cyberbullying, inappropriate content, grooming:

- Screen-shot evidence if possible (do NOT forward inappropriate images)
- Report to Welfare Officer and may need CEOP (Child Exploitation and Online Protection Command)
- Educate swimmers about online safety
- Review club's social media and communication policies

Self-Harm or Mental Health Crisis

- Ensure immediate safety
- Involve parents/carers (unless this increases risk)
- Signpost to appropriate support (GP, CAMHS, crisis services)
- May require safeguarding referral if risk of significant harm
- Maintain supportive environment at club

Appendix B: Reporting Procedures Step-by-Step

Step 1: Recognition and Immediate Response

If a swimmer approaches you:

- Listen carefully and calmly
- Take what they say seriously
- Reassure them they've done the right thing
- Do NOT promise complete confidentiality

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- Do NOT ask leading questions or investigate
- Do NOT contact parents/carers without guidance
- Do NOT discuss with others

If you observe something concerning:

- Document what you saw (facts only, not opinions)
- Do NOT investigate further
- Do NOT confront the alleged perpetrator

Step 2: Report to Welfare Officer

Within 24 hours (except the low level concerns which may be resolved informally) contact:

- Welfare Officer, see [9.1 Internal Contacts](#)

Information to provide:

- Date, time, and location
- Names of individuals involved
- Factual account of what was said or observed
- Any immediate actions taken
- Names of witnesses (if any)

Step 3: Welfare Officer Assessment

The Welfare Officer will:

- Acknowledge receipt of the concern **immediately**
- Conduct initial assessment **within 24 hours**
- Determine severity level
- Decide on appropriate action
- Inform the reporter of next steps (maintaining confidentiality)
- Document all decisions

Assessment considerations:

- Immediate risk to the child or others
- Nature and seriousness of concern
- Whether the concern is about someone within or outside the club
- Whether other agencies are already involved

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- Historical context (are there previous concerns?)

Step 4: Action Pathways

PATHWAY A: Informal Resolution (Low-level concerns)

- Welfare Officer mediates or provides guidance
- All parties informed of expected behaviours
- Monitoring plan established
- Documented and reviewed after [2-4 weeks]
- May include coaching advice, reminders of Code of Conduct

PATHWAY B: Formal Club Action (Medium-level concerns)

- Formal investigation may be required
- Swim England Safeguarding Team consulted
- Potential suspension pending investigation
- Documented formally
- Disciplinary procedures may follow

PATHWAY C: External Referral (High-level concerns)

- **Immediate referral to:**
 - Local Authority Designated Officer (LADO), refer to [9.2 External Contacts](#)
 - Children's Social Care, refer to [9.2 External Contacts](#)
 - Police: 101 (or 999 if emergency)
 - Swim England Safeguarding Team: 01509 640 230 / wavepower@swimming.org
- Club cooperates fully with external investigation
- Suspension/removal of alleged perpetrator from club activities pending investigation
- Information shared on "need to know" basis only

Step 5: Follow-Up and Review

- Welfare Officer monitors situation
- Regular check-ins with affected individuals
- Case review after [30/60/90 days]
- Lessons learned incorporated into training
- Documentation completed and stored securely



Document Sign-Off

This protocol has been reviewed and approved by:

Club Secretary: Celia Benham

Club Welfare Officer: Kelly Cheney

Club Chair: Cecile Stearn

Club Vice Chair: Karina Kajelova

Club Head Coach: Carmen Georgescu-Spiers

Date: 22 July 2026

This document is based on Swim England's Wavepower 2024-2028 Safeguarding Policy and meets the requirements for affiliated swimming clubs. It should be reviewed annually and updated whenever there are changes to legislation, Swim England guidance, or club circumstances.