Safeguarding and Child Protection Policy

Saturday Family Fun Swim: children with SEN/disabilities (under 14)

Organisation	Bright Starts SEN CIC
Activity	Saturday family fun swim for children with special educational needs and/or disabilities (SEND), under 14, accompanied by a parent or carer
Venue	Upper Wharfedale Swimming Pool
Designated Safeguarding Lead (DSL)	Jessica Beeson 07469713842 brightstartscic@gmail.com
Version / approved	1 approved by Jessica Beeson on 24/9/26
Next review due	24/10/26

1. Policy statement

Bright Starts SEN CIC is committed to safeguarding and promoting the welfare of every child who attends our Saturday Family Fun Swim. We believe that every child, whatever their age, disability, gender, race, religion or belief, sexual orientation or background, has the right to be protected from harm and to enjoy swimming in a safe, welcoming environment.

The welfare of the child is our paramount consideration. Safeguarding is everyone's responsibility. We will listen to children (in whatever way they communicate) and to their families, act on every concern, and work with the local authority, police and other agencies where a child may be at risk of harm.

2. Scope

This policy applies to everyone involved in the session: trustees and committee members, paid staff, volunteers, lifeguards and venue staff working alongside us, contractors, and parents, carers and visitors while at the session. It covers the pool hall, changing rooms, toilets, entrance and car park, and any communication with families outside the session (phone, email, messaging or social media).

The session takes place at premises run by Upper Wharfedale Swimming Pool. This policy sits alongside the operator's own safeguarding policy, Normal Operating Procedure and Emergency Action Plan. Where the two differ, the stricter standard applies, and the DSLs of both organisations liaise on how concerns are shared and recorded.

3. Legal and good-practice framework

- Children Act 1989 and Children Act 2004
- Working Together to Safeguard Children (HM Government, statutory guidance; current edition)
- Safeguarding Vulnerable Groups Act 2006 and Protection of Freedoms Act 2012 (vetting and barring, DBS referrals)
- Equality Act 2010 (including the duty to make reasonable adjustments for disabled people)
- Data Protection Act 2018 and UK GDPR; DfE Information sharing advice for safeguarding practitioners
- Health and Safety at Work etc. Act 1974; HSE guidance HSG179, Managing health and safety in swimming pools
- DfE guidance on keeping children safe in out-of-school settings, and NSPCC Child Protection in Sport Unit safeguarding standards

- Local safeguarding partnership procedures for North Yorkshire, including the Local Authority Designated Officer (LADO) arrangements

4. Roles and responsibilities

Role	Responsibilities
Board / trustees	• Ultimate responsibility for safeguarding; approve the policy and review it annually. • Appoint a DSL and deputy; ensure safe recruitment, training and resources; receive anonymised safeguarding reports.
Designated Safeguarding Lead (DSL)	• First point of contact for all safeguarding concerns; decides on referrals to children's social care, the police or LADO. • Keeps confidential records; ensures staff and volunteers are trained; liaises with the pool operator and local safeguarding partnership. • Is trained to DSL level and refreshes it at least every 2 years. The Deputy DSL acts in the DSL's absence, or if the DSL is the subject of a concern.
Session Lead	• Runs each session safely; ensures ratios, register, briefings and checklists are done. • Reports concerns to the DSL immediately; can pause or stop a session if safety or safeguarding standards are not met.
All staff and volunteers	• Read and follow this policy and sign the code of conduct. • Complete safeguarding training before starting, and refresh it regularly. Report every concern; never keep a secret or investigate on their own.
Parents and carers	• Remain responsible for their child throughout the session, including in the changing rooms. • Follow the session rules, provide accurate registration information, and raise any concern with the Session Lead or DSL.
Pool operator and lifeguards	• Responsible for pool safety and the venue's procedures. Follow our arrangements for this session and report any safeguarding concern to our DSL as well as their own.

5. Why children with SEN and disabilities need extra attention

Research by the NSPCC and others shows that disabled children are more likely to experience abuse and neglect than non-disabled children, and are often less likely to be identified and heard. We take this into account in everything we do:

- Children may have limited or no speech, or communicate through behaviour, signs, symbols or technology. We learn how each child communicates and pay close attention to it.
- Some children rely on adults for personal care, giving more opportunities for abuse, and may not know what is or is not acceptable.
- Children may be more isolated, less able to resist, and more used to being compliant with adults.
- Signs of abuse (a change in behaviour, distress, withdrawal, injuries) can wrongly be put down to the child's disability. We do not assume: we ask, record and report.
- Disabled children are at higher risk of bullying and of harm from peers as well as adults.

6. Safer recruitment, vetting and training

- Everyone working with children, paid or unpaid, is recruited using a safer recruitment process: application form, interview, ID verification, two references, and a signed declaration.
- An enhanced DBS check is obtained before anyone starts. Where the role qualifies as regulated activity with children, an enhanced check with a children's barred-list check is required. If unsure whether a role qualifies, check with the DBS before the person starts. Certificates are renewed or checked through the DBS update service every 3 years.
- Nobody works alone with a child
- Induction covers this policy, the code of conduct, disability awareness, the emergency procedures, and what to do if you are worried about a child.
- Safeguarding training is completed before starting and refreshed at least every 3 years, with an annual briefing for all. DSL has additional training.
- A 3-month probation and review applies to new volunteers and staff.
- The pool operator's lifeguards and staff must hold appropriate qualifications, DBS checks and safeguarding training in line with their employer's policy. We ask for confirmation of this.

7. Code of conduct

All staff and volunteers sign the code of conduct at Appendix D.

We always	We never
• Treat every child with respect, dignity and kindness, and listen to them. • Use the child's preferred communication and give them choices. • Work in open, visible areas with another adult present. • Ask parents/carers to provide personal care and hands-on support. • Explain before touching, and get the child's and the parent's agreement. • Challenge and report poor practice or worrying behaviour by anyone. • Record any incident, injury or concern the same day. • Dress and behave professionally, and stay sober and free of influence of drugs.	• Spend time alone with a child out of sight, or take a child anywhere on our own. • Provide intimate care (changing, toileting, dressing) or enter a cubicle with a child. • Use physical punishment, humiliate, shame or discriminate. • Give private lifts, gifts, money, or make contact via personal phone or social media. • Take photos or video on personal devices, or share images of children. • Engage in rough or sexually suggestive play, jokes or language. • Promise to keep a secret, or ask leading questions about a disclosure. • Show favouritism, or allow bullying or harassment.

8. Supervision, ratios and parent/carer responsibility

- Every child must attend with a parent or carer aged 18 or over, who stays for the whole session and is responsible for their child at all times. Older siblings under 18 cannot act as the responsible adult. Paid support workers must be named on the registration form and vetted by their employer.
- Parents/carers are in the water with their child if the child is a non-swimmer, a weak swimmer or has high support needs, and otherwise within arms reach. See the Risk Assessment for adult-to-child ratios.
- Children are counted in and out and signed in and out against the register. No child may leave with anyone other than an authorised person named on the registration form.
- If a parent/carer is not supervising their child properly, staff remind them; if this continues, the Session Lead may stop the child (or the session) from continuing in the water.

9. Changing rooms, toilets and intimate care

- Parents and carers help their own children to change, use the toilet and shower, regardless of the gender of the parent/carer or child. Family, accessible or unisex cubicles are provided for this.
- Staff and volunteers do not provide intimate care
- Unrelated adults do not enter a cubicle with a child, and adults do not change in areas where children are changing unless it is a family area.
- Staff patrol the entrance of changing areas at intervals but do not go in unless there is an emergency or concern, when they announce themselves.
- Phones, cameras and smart watches are not allowed in the changing areas.
- If a child appears to have an injury, staff do not undress or examine them. They note only what they can see without intervention and report it to the DSL.

10. Physical contact, water support and positive handling

- Hands-on support for water confidence or swimming skills is given by the parent/carer. Staff only use physical contact where needed to keep the child safe or where an agreed individual plan says so, in open view, with the child's and parent's consent.
- We do not use restraint as a behaviour-management tool. Physical intervention is only ever used as a last resort to prevent immediate serious harm (for example a child about to run into deep water), with the least force for the shortest possible time, by a trained person where possible.
- Any physical intervention is recorded on the same day, reported to the DSL, and explained to the parent/carer. The DSL reviews every incident and considers whether the child's plan needs changing.

11. Photography, filming, phones and social media

- No photography or filming by anyone (including parents and carers) in the pool hall or changing areas. Phones are kept away during the session, except in emergencies
- Official photographs or video (for example for funding or publicity) are taken only with the written consent of the parent/carer, by a nominated person using an organisational device, and stored securely. Children are not identified by name, and are not photographed in the water or in swimwear where avoidable.
- Anyone taking pictures is politely challenged. If a concern remains, or images are suspected to be inappropriate, tell the DSL immediately; the police are contacted if appropriate.
- Staff and volunteers do not connect with children or families on personal social media, or contact children directly. Communication is with parents/carers via Bright Starts email, Watsapp or website

12. Recognising abuse and concerns

Abuse can be physical, emotional, sexual or neglect, and can happen in the family, in the community, online or in settings like ours. It also includes bullying, domestic abuse, child sexual and criminal exploitation, radicalisation, female genital mutilation and forced marriage. You do not have to be certain. If you are worried, report it.

Possible signs (there may be other explanations, and disabled children may show them differently):

- Unexplained or inconsistent injuries, bruises in unusual places, or a child who flinches at contact.
- A sudden change in behaviour, mood or communication (for example withdrawal, aggression, clinging, sleep or eating changes, regression, or distress at being changed or touched).
- Fear of a particular person or situation, or reluctance to go home.
- Sexualised behaviour or knowledge that seems inappropriate for the child's age or stage.

- Poor hygiene, hunger, unsuitable clothing or persistent lack of supervision or medical care.
- A child who says or signs something worrying, or shows it through play, drawing or behaviour.

13. Responding to a concern or disclosure

1. **Stay calm and listen.** Let the child tell you in their own way (words, signs, symbols, gestures or behaviour). Do not push for detail or ask leading questions. If you need to, ask “Can you tell me more?”
2. **Reassure.** Tell the child they were right to tell you and that it is not their fault. Do not promise to keep it secret. Explain that you will need to tell someone whose job it is to keep children safe.
3. **Do not investigate or confront** the person concerned, and do not tell them about the concern.
4. **Record** what you saw, heard or were told, using the child’s own words or means of communication, as soon as possible and on the same day. Use the concern form (Appendix B). Sign, date and time it. Keep original notes.
5. **Report** it to the DSL straight away, before you leave the session. If the DSL is involved in the concern or is unavailable, tell the Deputy DSL. If neither is available, contact children’s social care or the police directly.
6. **Emergency.** If a child is in immediate danger or needs urgent medical attention, call 999 first, then tell the DSL.
7. **DSL action.** The DSL considers the concern, seeks advice if needed, and decides whether to refer to local authority children’s social care (by phone, followed by a written referral within 24 hours and/or the police. The DSL informs the parent/carer unless doing so could place the child at greater risk, and records decisions and reasons even where no referral is made.
8. **Follow up.** The DSL keeps in touch with the child’s family and any agencies, monitors the child, and reviews what can be learned. Anyone who is not satisfied with the response may escalate to the Deputy DSL, the trustee lead, or refer directly to children’s social care or the NSPCC.

14. Allegations against staff, volunteers or other adults

An allegation (or concern) is where an adult is reported to have harmed or may have harmed a child, committed a criminal offence against or related to a child, behaved in a way that indicates they may pose a risk to children, or behaved in a way that indicates they may not be suitable to work with children.

- Report it to the DSL immediately. If the concern is about the DSL, report it to Chair of trustees. Do not investigate and do not tell the person concerned.
- The DSL contacts the Local Authority Designated Officer (LADO) on the same day, or within one working day, and follows their advice. The police are called at once if a crime may have been committed or a child is in immediate danger.
- The person may be removed from contact with children while the matter is looked at. This is a neutral step and does not imply guilt. Their welfare and confidentiality are protected.
- Where an individual is dismissed or leaves because of harm or risk of harm to a child, a referral is made to the Disclosure and Barring Service (DBS), and to the governing body where relevant. Insurers and the pool operator are informed as required.
- **Low-level concerns.** Behaviour that does not meet the allegation threshold but falls short of the code of conduct (for example being over-familiar, favouritism, breaching photo rules) is also reported to the DSL, recorded, and reviewed for patterns.

15. Bullying and peer-on-peer harm

- We do not tolerate bullying, harassment or discrimination, including disability-based hostility, name-calling or excluding others. Staff act promptly and calmly and involve the families concerned.
- Harmful sexualised behaviour between children is always reported to the DSL, who considers whether a referral is needed and how each child can be supported.
- Where behaviour arises from a child's disability, we focus on understanding and support rather than punishment, while ensuring other children are kept safe.

16. Whistleblowing

Anyone who has a concern about poor practice or the way a safeguarding concern has been handled should raise it with the DSL, the trustee lead, or the Chair. If they feel unable to, or are not satisfied, they can contact the NSPCC whistleblowing advice line on 0800 028 0285. We will not tolerate any detriment to someone who raises a concern in good faith.

17. Registration, consent, information sharing and records

- Every child must be pre-registered using the form at Appendix C. This records emergency contacts, authorised collectors, health and medical needs, communication, sensory and behavioural needs, swimming ability, personal care needs, and consent for photographs. The Session Lead reviews each form before the child first attends.
- If a child's needs are complex, we discuss them with the parents/carers and agree a written individual plan. If we cannot safely meet the child's needs, we say so honestly and discuss alternatives, rather than admit the child.
- Personal and health information is special-category data. It is stored securely, shared on a need-to-know basis (for example key points with lifeguards and first-aiders), kept for no longer than necessary, and handled in line with UK GDPR and our privacy notice.
- Data protection law does not prevent us from sharing information to keep a child safe. Consent is not needed to share a safeguarding concern with the appropriate agencies where sharing is necessary to protect a child, though we will normally be open with parents/carers unless that would put the child at risk.
- Safeguarding records are factual, kept separately from general records, held securely with access limited to the DSL and are not destroyed early
- A register of children, adults, staff and volunteers is kept for every session, with sign-in and sign-out. Accident and incident logs are kept and reviewed.

18. Complaints and feedback

Families can raise concerns or complaints with the Session Lead at any time. We acknowledge a complaint within 5 working days and respond in writing within 20 working days. Complaints about safeguarding are always shared with the DSL. Feedback is welcomed from children and families in whatever format suits them.

19. Monitoring and review

- The Session Lead reviews any incidents and near-misses after each session.
- The board reviews this policy, training and DBS records, and safeguarding incidents (anonymised) at least annually.

- We review this policy sooner after a serious incident, a change in law or guidance, or a change to the session or venue.

Appendix A: If you are worried about a child (poolside quick reference)

1. **Listen** calmly. Let the child communicate in their own way. Do not ask leading questions.
2. **Reassure.** "You did the right thing telling me." Do not promise secrecy.
3. **Do not** investigate, confront anyone, or discuss it with others.
4. **Record** exactly what you saw and heard, on the same day. Sign, date and time it.
5. **Report** to the DSL immediately
6. **Emergency?** If a child is in immediate danger or needs urgent medical help, call **999** first.

Contact	Details
Designated Safeguarding Lead	Jessica Beeson 07469713842
Police	999 (emergency); 101 (non-emergency)
NSPCC helpline (adults worried about a child)	0808 800 5000, help@nspcc.org.uk
NSPCC whistleblowing advice line	0800 028 0285
Childline (for children)	0800 1111

Appendix B: Safeguarding concern / incident report form

Complete as soon as possible and give to the DSL the same day. Record facts, not opinions. Use the child's own words or means of communication.

Date and time of concern	
Name of child and age	
Parent/carer present? Name	
Name and role of person reporting	
What happened, or what you saw or heard Include exact words, signs, gestures or behaviour. Attach additional pages if needed.	
Any injuries seen (describe, do not examine)	
Who else was present or has been told?	
Immediate action taken	
Signature and date of person reporting	

For DSL use

Date and time received	
Advice sought (from whom)	
Decision and rationale	
Referral made? To whom, when, and by whom	
Parent/carer informed? Details or reasons if not	
Follow-up actions and review date	
DSL signature and date	

Appendix D: Staff and volunteer code of conduct declaration

I confirm that I have read and understood the Safeguarding and Child Protection Policy, and I agree to:

- Follow the code of conduct at Section 7 and the arrangements for supervision, changing rooms, physical contact and photography.
- Report any safeguarding concern, allegation or low-level concern to the DSL immediately and record it the same day.
- Never be alone with a child out of sight of others, or provide intimate care.
- Not take photographs or videos on personal devices, or contact children or families privately.
- Tell the DSL immediately if I am arrested, cautioned or investigated for any offence, or if my circumstances change in a way that could affect my suitability to work with children.
- Attend safeguarding training as required and stay up to date with the policy.

Name	
Role	
Signature	
Date	
DBS certificate number and date checked (organisation use)	