

Rt Hon Caroline Nokes MP
Chair – Women and Equalities Committee
House of Commons

Via email to womeqcom@parliament.uk

Dear Ms Nokes,

Health and Wellbeing of female swimmers

Thank you for your letter of 25 September and for the opportunity to provide a written submission as part of the Women and Equalities Committee's important inquiry into women and girls in sport. I am proud of the representation of women and girls across aquatics.

The Senior Leadership Team at Swim England is majority female and our board is gender-balanced. Our Swim England workforce is approximately two-thirds female and of our 170,000 members, more than 50% are women and girls.

Beyond Swim England as an organisation, swimming remains an incredibly popular activity for women and girls with 1 million more women (5.8 million) going swimming in the last year than men (4.7 million).

Girls are also more likely to say they love swimming (74%) compared to boys (62%) and more likely to say they want to swim more (80%) compared to boys (73%). Swim England's 2019 Value of Swimming report also found that girls who swim have considerably higher increases in wellbeing, health and self-confidence compared to boys, with swimming more than doubling women and girls' self-confidence.

Despite the positive impact swimming has for millions of women and girls in England, recent reports have shown that sadly there have been incidences where poor practices and unacceptable behaviours, including around the weighing of swimmers, has caused distress and harm to those taking part in our sports and activities.

Ensuring there is a positive, welcoming, safe and inclusive culture across aquatics for everyone is an issue we are committed to tackling and have already taken action to begin the process of cultural change as outlined in our Heart of Aquatics¹ plan.

I will respond to your points in turn.

¹ <https://www.swimming.org/swimengland/heart-of-aquatics/>

1. How many swimmers have raised complaints about inappropriate approaches to weighing by swimming coaches, what proportion are female, and, of those, how many are under 18?

Whilst our old case management system isn't able to report in this level of detail, I can confirm we have no open, or recently closed cases from the last twelve months that have involved allegations of an inappropriate approach to weighing on our case management system.

We have received concerns and cases in the past which have related to weighing. We are aware of the negative impact which this type of practice can have on children and owing to this in June 2023 Swim England changed our previously published position statement in relation to weighing, to policy.

The policy states those on the talent pathway, and athletes aged over 18, can be weighed but this should 'only be undertaken with clearly documented reasoning, specific to that athlete, and with the athlete's optimal long-term development in mind' – otherwise athletes should not be weighed and action will be taken should an investigation demonstrate that this is occurring.

We know there will also be cases where people may have felt unable or unwilling to approach Swim England at the time. As part of our Heart of Aquatics Plan we have given all members of the aquatics community, past and present, the opportunity to share their views and experiences. I have set out more details about the form this has taken below.

This work is underway with the interim findings expected to be shared with us before the end of the year.

2. How has Swim England supported affected swimmers?

Swim England has expanded and strengthened our safeguarding and welfare team, including the appointment of Talent Welfare Officers.

We have also delivered workshops on disordered eating/eating disorders for parents, athletes and coaches to help them recognise the signs and symptoms and to signpost to where to go for help and support.

Swim England has also produced guidance documents on the subject of Low Energy Availability (LEA)², which can be caused by relative energy deficiency in sport (RED-S), overtraining syndrome, disordered eating or an eating disorder.

Again, our guidance includes how to identify the signs and signposts to where expert support is available.

As part of our support to affected swimmers, we are keen to listen and better improve the support which swimmers feel they require from Swim England. That is why, as part of our Heart of Aquatics Plan we have commissioned independent experts to undertake a comprehensive listening exercise, completely independently of Swim England, to give all members of the aquatics community the opportunity to share their views and experiences. This includes current and former club members, parents, coaches, teachers, workforce, club committee members, officials and pool owners/operators.

This involves a private and anonymous online 'listening space' accessible to all as well as pre-arranged interviews, focus groups and online research with the independent experts (the results of which will be anonymised before being shared with Swim England).

This work will help underpin the support which we provide to swimmers going forward.

² <https://www.swimming.org/sport/low-energy-availability-guidance/>

3. What steps have you taken to investigate the prevalence of inappropriate use of weighing and, to your knowledge, how many swimming clubs have employed potentially harmful approaches?

Swim England has communicated with all affiliated clubs to reiterate the policy that athletes under the age of 18 should not be weighed unless they are on a nationally supported talent pathway.

Weighing of over 18 athletes or those under 18 on a nationally supported talent pathway should only be undertaken with clearly documented reasoning, specific to that athlete, and with the athlete's optimal long-term development in mind. The policy also sets out a 15 point best practice guide for this process which stresses that in all cases there should be an athlete-centred approach to monitoring, respecting the athlete's rights and decision making.

Additionally, when members of the Swim England talent team visit with affiliated performance clubs, welfare and safeguarding issues such as weighing are always a part of the discussions. Efforts have also been made through education and communication to empower parents to better understand and identify what is and isn't acceptable behaviour and give them confidence to raise concerns.

The strengthened Safeguarding team respond to concerns raised with us and would seriously investigate any concerns raised about the weighing of athletes. As mentioned we have undertaken a listening exercise encouraging any member of the aquatic community, past or present, to raise any concerns.

Swim England is currently revising our coaching certification course content and the weighing policy and negative aspects of this being done incorrectly is an important part of this work.

Swim England has appointed eight members to a new Oversight Committee comprising independent experts as well as athlete, judicial and culture representatives alongside members of the organisation. Reporting directly to the Swim England board, the committee will manage and oversee the national governing body's safeguarding, welfare and culture plan.

4. How many coaches have been found to have acted inappropriately in relation to weighing of swimmers and what action has been taken against them?

As per question one, our case management system isn't able to report to this level of detail.

Whilst it is important to recognise that the vast majority of coaches within aquatics are dedicated individuals committed to providing a positive environment for participants to enjoy their time in the water, we have demonstrated our determination to act when unacceptable behaviours and practices are brought to our attention.

We have taken action against coaches historically where swimmers were weighed inappropriately, however, it would be fair to say that in most cases, the inappropriate behaviour of the coach was wider than the weighing of the swimmer.

Following the publication of the weighing policy (as set out in more detail above) action can now more easily be taken by Swim England purely in relation to the weighing of swimmers, where the policy is being contravened.

Whilst Swim England will take a firm line on this in order to protect our members, it is important to note that this will be supported by ongoing education in this area which we hope will eradicate the problem.

We have launched the Swim England Coaching Plan, outlining the key work that we will undertake in the next three years to cultivate a coaching culture and behaviours that ensure our participants enjoy a safe and fulfilling sporting experience.

5. What steps have you taken to re-educate coaches?

We strengthened our position on the weighing of athletes from guidance to a mandatory policy and have communicated this to all coaches and clubs and additionally we have run a number of webinars on this issue for coaches.

We have also run a number of “coaches’ forums” as part of our ongoing efforts to continuously educate our coach workforce.

We are reviewing and updating our coaching certification process and the policy around weighing has been included in the roles and responsibilities section of the ‘Senior Coach’ role.

WavePower – Swim England Child Safeguarding Policies and Procedures states that coaches should “always put the wellbeing, health and safety of the child before all other considerations including the development of performance.”

WavePower is being reviewed and revised for relaunch in 2024 and this will be supported by a comprehensive communication plan to ensure all parts of our sports are aware of its contents.

6. We understand Swim England has recently adopted a new weighing policy. I should be grateful if you could set out the key elements of that policy; the evidence you drew on in formulating it; and the steps you are taking to ensure the policy is followed by all coaches and affiliated clubs.

The key elements of Swim England’s weighing policy³ is that athletes under the age of 18 should not be weighed unless they are on a nationally supported talent pathway.

The weighing of over 18 athletes or those under 18 on a nationally supported talent pathway should only be undertaken with clearly documented reasoning, specific to that athlete, and with the athlete’s optimal long-term development in mind. The policy also sets out a 15 point best practice guide for this process which stresses that in all cases there should be an athlete-centred approach to monitoring, respecting the athlete’s rights and decision making.

The policy was produced by a team of sport science and medicine staff including our lead sports nutritionist, sports psychologist and doctor. We also sought advice from British Swimming and consulted with Scottish Swimming and Swim Wales on the guidance as well as with coaches about the document.

Our expanded safeguarding and welfare team responds to concerns, and will thoroughly investigate any concerns raised about the weighing of athletes.

As highlighted in response to point 5, we are also undertaking a number of actions to educate coaches and club officials on this issue to ensure the policy is well understood and complied with.

The requirement for clubs to adhere to the weighing policy is also discussed as part of conversations when Swim England visits affiliated clubs.

7. Can you describe how your new safeguarding, welfare and culture plan, Heart of Aquatics, is tackling the issue of weighing and its health and wellbeing impacts, particularly on girls and women?

Our approach, as set out in the Heart of Aquatics Plan is based on three pillars. Listen. Support. Resource.

At the very centre of Heart of Aquatics is a commitment to developing a culture of listening to the aquatics community and understanding what is taking place across the country. Following the independent work already undertaken in 2023 we will set up listening forums and groups which will continue beyond this initial phase. This is critical as it will inform where particular interventions or

³ <https://www.swimming.org/swimengland/weighing-aquatic-athletes-policy/>

changes in our current approach are required and help us decide how we set our cultural standards and activities going forward.

That is then backed up by providing the development and support required by all parts of the aquatic community. In particular in the field of safeguarding and welfare to make sure that change is seen, understood and delivered by all in aquatics.

Central to our support for the community is ensuring that we have the necessary mix of formal and informal training and education available to clubs, coaches and volunteers as well as parents, whilst also providing access to key members of the Swim England team. This approach will embed support right across the community.

Finally, we are committed to providing the required resources to deliver the level of support needed to ensure we have a positive and safe culture in place for everyone, across all levels of aquatics.

We have already begun the process of increasing the resources dedicated to meeting the safeguarding and welfare needs of our participants and sports.

Of course each of the three pillars is broader than just the issue of weighing within aquatics but that would absolutely be a part of the discussions in all stages.

In Heart of Aquatics we made the commitment that we will move away from guidance regarding weighing and instead create policies that need to be adhered to at all times, which will avoid any areas of ambiguity, which we have done.

8. What is Swim England's guidance and policy for coaches and medical staff, working at the elite level through to local clubs, on menstrual monitoring and tailored training programmes?

British Swimming is the organisation responsible for elite level for swimming and diving so the following comments relate only to the clubs and talent pathways for which Swim England is the governing body.

In recent years we have convened many webinars on menstruation to coaches and also produced a document on coaching the female athlete. Elite female swimmers have also produced videos for use on our talent pathway starting at aged 12.

Swim England has organised a 5-session course for swimmers on our youth and senior performance squads with a company called Well HQ who are leaders in the field of supporting female athletes.

These sessions focus on a range of areas including the menstrual cycle, female nutrition and REDs and also include a session on improving two-way conversations between athletes and coaches.

As part of our education programme menstrual monitoring is covered and we advise swimmers to use a tracking app but it is not compulsory. Some squads use a wellness app which also monitors menstruation.

We have also changed our swim England policy on swim wear at competition allowing swimmers to wear period swimwear which is not allowed in World Aquatics events.

As set out in our Wavepower document, the key principle that all Swim England affiliated clubs and coaches must abide by at all times is that the welfare of the child is and must always be paramount.

9. What efforts has Swim England made to share and learn from best practice in female health across sports?

Swim England continually seeks to learn and share information and good practice with other organisations from across the sporting landscape and beyond through attending conferences and workshops, bilateral meetings and information sharing, the continued professional development of staff and volunteers and utilising experts to advise the organisation, such as the independent chair of the Oversight Committee.

Ultimately, ensuring the correct culture is in place across aquatics to enable all the women and girls involved in aquatics to thrive and have the best possible experience is a continuous process of learning and adapting.

One such practical example is the workshops with Well HQ mentioned in response to point 8 above.

10. To what extent is female health built into Swim England's coaching qualifications? Can you set out what is covered at different levels of coaching?

Across all levels there is a focus on ensuring the safeguarding and welfare of each individual athlete and that all coaching activity should be adapted to the needs of the individual athlete.

Assistant coach qualifications include coverage of general health and the impacts on athletes. This involves an introduction to athlete development (LTAD) based on age and key physical, social, and emotional developments that occur including maturity. The basics of anatomy and physiology are also covered for each human system.

Coach qualifications include a reinforcement of the stages of development, wider coverage of the human body systems to include some basics on reproduction. Within the nutrition section there is some learning delivered on Energy balance, menstrual cycle, glycogen stores, hydration status, gut weight, lean mass, fat mass etc.

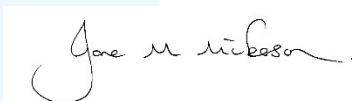
Senior coach qualifications contain even more specific focus at this level on the specific considerations/adaptations needed based on individual athletes, content includes

- Males vs Females
- Para
- Events
- Growth and Development/ Maturation Status
- Menstrual Cycle
- Exams

As mentioned in response to earlier points, Swim England's coach development team has delivered workshops via their 'connecting with coaches' programme on female health.

Thank you again for the opportunity to set out some of the actions Swim England has taken, is taking or will be taking in the future and I would be happy to provide more information if requested. I would reiterate the commitment of myself, my senior leadership team and the Swim England board to ensuring that there is a positive culture across our sports and that the highest standards of welfare and safeguarding are in place.

Yours sincerely,



Jane M Nickerson MBE
Chief Executive Officer – Swim England