

Contents

1.	Introduction.....	3
2.	Responsibilities.....	4
3.	Teacher to pupil ration.....	6
4.	Supervision of changing rooms.....	7
5.	Lifeguard provision.....	8
6.	Qualifications to provide teaching.....	9
7.	Qualifications to Provide Lifesaving Cover.....	12
8.	Pool Plant Operation & Pool Management.....	13
9.	Records.....	14
10.	Risk Assessment (See Appendix A).....	15
11.	Normal Operating Procedure (NOP).....	18
12.	Emergency Action Plans.....	21
13.	Pool Rules.....	22
14.	Diving.....	22
15.	Conditions of Hire.....	23
16.	Child Protection.....	23
17.	Acronyms & Abbreviations.....	24

1. Introduction

1.1 Swimming is an important life skill. In addition, it is a highly beneficial activity for acquiring an increased movement, vocabulary and skills, for health, for enjoyment and as a threshold skill, giving access to many other water-based recreational activities. It is one of the few activities that people can enjoy all their life either on their own or with friends and family of the same or different ages, whether just for fun or competitively.

1.2 The purpose of this document is to provide guidance on safe practice in school swimming and water safety, whether at a school pool, hydrotherapy pool or a public swimming pool.

1.3 Each school that has pupils taking part in swimming has a responsibility to ensure that it takes sufficient action to safeguard staff and pupils. It should be aware of:

- the risk assessment that is in use for the swimming pool.
- the Normal Operating Procedure (NOP)
- the Emergency Action Plan (EAP)
- conditions of hire - if relevant
- pool rules
- any special needs requirements or medical conditions of pupils.

1.4 This document sets out the policies and procedures of Kent County Council (KCC) in relation to swimming pool safety. The appendices contain model procedures and forms which must be made specific to each school pool.

1.5 References:

All schools with their own pools should have a copy of HSG 179 “Managing Health & Safety in Swimming Pools” 4th Edition 2018, downloadable from the HSE website

All schools should hold a copy of the AFPE (Association for Physical Education) 2016 edition of “Safe Practice in Physical Education and School Sport”, details further guidance on safety issues including swimming; can be obtained via the website

“Safe Supervision” CIMSPA 2001 (Published: 2nd edition 2001, reprinted 2012) This is a joint publication from CIMSPA, ASA, IOS and Lifesavers (RLSS UK). Can be purchased directly from CIMSPA

2. Responsibilities

2.1 Overall County Council responsibility

KCC has responsibility for ensuring safety in swimming in schools where they are the employer. As part of this responsibility KCC provides the safety policy, guidance, procedures for swimming, and ensures that its employees receive the necessary training to carry out their delegated tasks. This policy and associated guidance are designed to be adapted to suit each individual school.

In Foundation, Voluntary Aided schools and Academies the Governing Body holds this responsibility.

2.2 School responsibility

The Governing Body and Senior Management of the school should ensure that a nominated member of staff is delegated the responsibility of swimming coordinator and applying the swimming pool safety policy and procedures in the school. This will include the operation of the school's own swimming facility or use of a third-party pool. It also includes monitoring and recording of the;

- appropriate risks assessments
- pool safety operation procedures (NOP & EAP)
- qualifications and training of staff and record keeping
- any instructions issued to staff
- conditions of hire or arrangements for use of the pool.

2.3 Teaching staff

Teachers have a duty of care that operates for any activity in which children are involved; teachers cannot transfer that duty of care to anyone else. This applies to all activities within the school curriculum and to extra-curricular activities organised by the school during and outside school hours, whether on or off the school site.

In relation to swimming this means that:

- children are appropriately supervised when changing
- pupils are under control at all times
- a headcount is taken before, during and after sessions
- normal and emergency procedures are followed and enforced as necessary
- teachers have an overview of the teaching of their children and the conduct of the class.

Primary school teachers should accompany their own class to swimming whenever possible, because of the special knowledge they have of their pupils.

2.4 Adults other than teachers

Adults other than teachers (AOTTs) are beneficial and in some cases can be essential support with the delivery of swimming in school and in the extended curriculum, whether on or off site.

They can:

- support and work beside teachers
- supervise changing
- administer first aid
- look after any children whom are unwell or children who are not swimming.

Teachers cannot transfer their duty of care to AOTTs but where AOTTs have swimming teaching qualifications they may be involved in the teaching of swimming.

Higher Level Teaching Assistants (HLTA) who have the required specific competencies may replace a teacher who does not, so long as there is always another teacher present on poolside teaching with the group. The pool environment is more isolated than a classroom where they can more easily call upon qualified teacher support if required.

AOTTs should be vetted by the disclosure and barring service (DBS) to work with children.

2.4 Specialist swimming teachers and swimming instructors

Specialist swimming teachers are teachers with Qualified Teacher Status (QTS) who also hold an Amateur Swimming Association (ASA) swimming teaching qualification.

Swimming instructors will hold a relevant ASA teaching qualification and may be employed by a public pool or employed by a school to teach in their own pool.

Both have responsibility for ensuring the safe conduct of the class in the water and on the poolside, in line with good practice and their training which includes:

- planning, developing and monitoring the swimming programme
- preparing schemes of work appropriate to pupils' ages, abilities and interests
- co-operating with the class teacher to check numbers of pupils before, during and after each session
- identifying specific groups for each swimming session
- being familiar with the Normal Operating Procedure (NOP) & Emergency Action Plan (EAP) for the pool
- being familiar with the emergency equipment provided
- running emergency drills at least every term
- ensure adequate lifesaving and first aid cover is available and is maintained at all times
- entering the water and affecting a rescue if necessary.
- they must be vetted by the disclosure and barring service to work with children.
- they will organise non-specialist class teaching staff who maintain their duty of care for the children.

Ideally a specialist or fully qualified teacher should always be present when children are being taught swimming.

In school learner pools

In small shallow water (1.2m and under) school learner pools it may not be practical to have a specialist swimming teacher or instructor of swimming present. In these circumstances the class teacher, trained to teach swimming, may be the only teacher present and will take on the responsibilities of the specialist teacher. They must never work alone.

2.62 Lifeguards

Pool operators have a responsibility for the safety of all who use their pools. Whenever children swim, there must be someone present with appropriate lifeguarding, rescue and first aid skills. To identify the number of lifeguards that may be required, the HSE have produced the table below.

<u>Approximate Pool Size:</u> <u>M</u>	<u>Area M²</u>	<u>Number of lifeguards</u>	<u>Number of lifeguard's busy conditions</u>
<u>20.0 x 8.5</u>	<u>170M²</u>	<u>1</u>	<u>2</u>
<u>25.0 x 8.5</u>	<u>212M²</u>	<u>1</u>	<u>2</u>
<u>25.0 x 10.0</u>	<u>250M²</u>	<u>1</u>	<u>2</u>
<u>25.0 x 12.5</u>	<u>312 M²</u>	<u>2</u>	<u>2</u>
<u>33.3 x 12.5</u>	<u>416 M²</u>	<u>2</u>	<u>3</u>
<u>50.0 x 20.0</u>	<u>1000M²</u>	<u>4</u>	<u>6</u>

<u>Location: _____</u>	<u>Role:</u>
<u>In a school pool</u>	<u>This must be a teacher, the swimming teacher or an AOTT</u>
<u>In a public pool</u>	<u>This must be a qualified pool lifeguard</u>
<u>In a private pool</u>	<u>This must be a qualified lifeguard, a teacher, the swimming or an AOTT</u>
<u>Hydrotherapy pool</u>	<u>This must be specialist staff, a teacher, the swimming teacher or an AOTT</u>

The above is only designed as a guide, additional lifeguards may be required if there are hidden areas of water or where there are extensive areas of water deeper than 2 metres. Conversely, fewer may be required where the pool only contains water of 1 metre or less in depth, or during programmed school swimming sessions, considering the ages and swimming abilities of the pupils, and the numbers being supervised by competent members of staff.

Whoever it is, the person responsible for lifeguarding, rescue and first aid will:

- be familiar with the pools normal operating procedures & emergency action plans
- maintain constant observation of the pool and pool users
- carry out rescues and initiate any other emergency action as required
- be able to affect a rescue from the bottom of the deepest part of the pool
- administer first aid
- prevent unsafe activities
- ensure that the pool is never left unsupervised whilst in use

- assist in the running of emergency drills
- secure the pool against unauthorised access when not in use
- communicate with children and/or teaching staff to achieve the above.

Class teachers and teachers of swimming must work with lifeguards. Lifeguard instructions for safe conduct in the pool should be followed at all times.

N.B. A teacher of swimming who is also responsible for lifeguarding should not work alone. Another person should assist with teaching a group of children or assist the teacher with a rescue and first aid, as well as looking after the rest of the children in the event of the teacher having to undertake a rescue.

3. Teacher to pupil ratios

3.1 Each pool will have a designated maximum bather capacity appropriate to the size of the pool which should be specified in the NOP.

3.2 Irrespective of the ratio there must always be at least 2 supervisors present on the poolside. Pupil/teacher ratios must not exceed 20:1 and for the vast majority of cases in primary school swimming should be less than this. The following ratios are based upon safety considerations rather than teaching requirements:

Adult and baby groups 12:1

One teacher to twelve pairs of adults and babies/toddlers under the age of five.

Non-swimmers and beginners 12:1

Young children, normally primary school age, or adults being introduced to swimming who are unable to swim 10 metres unaided on back and front.

Children under the age of seven 12:1

Irrespective of their swimming ability, group size should be restricted

Improving swimmers 20:1

Swimmers of a similar ability to each other who can swim at least 10 metres competently and unaided on their back and on their front. It is recommended that the lesson be confined to an area in which the children are not out of their depth.

Mixed ability groups 20:1

Pupils with a range of ability (from improving to competent) where the least able and least confident are working well within their depth. Swimmers' techniques, stamina and deep-water experience should be considered.

Competent swimmers 20:1

Those swimmers who can swim at least 25 metres competently and unaided on front and back, and can tread water for 2 minutes.

Competitive swimmers 30:1

Training only with very competent swimmers.

Specialist swimming activities - various

For more information about the appropriate ratios for specialist activities refer to “Safe Supervision” CIMSPA 2001 (Published: 2nd edition 2001, reprinted 2012)

Swimmers with disabilities 4:1 (with an appropriate number of helpers, and will vary depending on the individual needs)

Each situation must be considered individually as people with disabilities are not a homogeneous group. Care must be taken to ensure that there are sufficient helpers in the water to provide a 1:1 ratio for those needing constant support and a sufficient number of other helpers to provide the degree of support required by the range of disabilities within the group. There are national organisations for specific disabilities from which further guidance may be obtained. Individual risk assessments must be undertaken so that the teacher in charge of swimmers with disabilities can be aware of the particular needs of each individual.

The Equalities Act ensures that disabled persons may not be treated less well than any other person. Policies and procedures or physical changes to the environment may need to be put in place for children with disabilities to be able to use the pool.

4. Supervision of changing rooms

4.1 Children should be supervised whilst changing:

- if children are using a mixed sex changing area with cubicles then a member of staff of either gender may supervise.
- if using open-plan single-sex changing areas then only staff of the appropriate gender should enter the changing room, unless in an emergency.
- if children under the age of seven are swimming, a mixed gender group may use an open-plan single-sex changing room, if schools do not have the staff (teachers and/or AOTTs) of the appropriate number or gender to supervise children in their own-sex changing room. In a public pool this will need to be notified to and approved by the pool management.

4.2 Teachers will sometimes have to operate a remote supervision procedure when gender balance is not appropriate. This can only happen where the children are responsible enough and mature enough to take on significant personal responsibility whilst changing. In order to protect themselves, two members of staff should operate together when controlling by voice through doorways, or entering changing areas in an emergency.

4.3 In public pools

4.3.1 Ideally children will change in separate “school changing areas” as it is not desirable for members of the public to share changing provision with school pupils.

Pool operators should be asked, wherever possible, to plan for separate areas or times to enable this to happen. Where this cannot be achieved appropriate supervision, arrangements need to be agreed between the pool and school.

4.3.2 Where changing takes place in open plan public single sex changing rooms and the school is unable to provide staff of each gender, a specific arrangement must be made with the pool management to provide a suitable member of staff to patrol the changing area whilst children are present. This member of staff must have child protection training. To ensure that the allocated member of staff is not left alone with a single child all children must wait until everyone is together before moving off. All staff used to supervise changing rooms should have had appropriate checks by the disclosure and barring service

4.4 In school pools

4.4.1 Children will be able to change without members of the public being present.

4.4.2 The arrangements for the supervision of children should be as for paragraph 4.1 and 4.2 above.

5. Lifeguard provision

5.1 There must always be somebody with the swimming group who holds the responsibility for life guarding, rescue and resuscitation. This person or persons must be suitably trained and qualified in accordance with the circumstances applying:

5.2 In a public pool or school pool:

5.2.1 Programmed session

In programmed sessions (such as teaching, coaching and other tuition) the degree of control inherently in place is likely to reduce the risks. The necessary safety cover may be provided by a teacher, provided they have the appropriate qualifications to teach and life-save, teaching ratios are appropriate and another competent adult is present.

Minimum Qualification: STA Pool Safety Award (Valid for two years)

If, in addition to those providing the teaching, there is a dedicated lifeguard provided who is fully qualified by the National Pool Lifeguard Qualification (NPLQ) and responsible for supervising the safety of the children being taught, teaching staff and AOTTs will not be required to have rescue skills but should understand the basics of teaching swimming.

The lifeguarding arrangements need to be agreed with the pool management within their conditions of hire prior to the swimming group starting.

5.2.2 Un-programmed session

In un-programmed sessions (recreational swimming - such as an end-of-term fun session) the unpredictable nature of children's behaviour will be such that a higher lifeguarding standard will be required, as per normal public swimming supervision.

Minimum Qualification: National Pool Lifeguard Qualification (NPLQ)

Un-programmed sessions must not be run unless an NPLQ lifeguard is in place, supported by teaching staff working as part of a lifeguard team to supervise pre-determined zoned areas in line with the NOP for the pool. School staff and AOTTs will need to be trained to do this and should work under the direction of the qualified pool lifeguard staff.

Lifeguards should must hold a valid RLSS/ISRM National Pool Lifeguard Qualification (NPLQ) achieved within the previous two years and kept up to date through a regular monthly programme of training and practice.

5.2.3 Mixed programmed and un-programmed sessions

Where the pool is in shared use and clearly divided between programmed and un-programmed swimming activities, suitably qualified teachers may provide both the teaching and lifeguard cover but only for the programmed area of the pool.

Minimum qualification: STA Pool Safety Award

Where shared use is not in defined areas then the standard of lifeguarding provision should be treated as if it is an un-programmed session.

Minimum Qualification: National Pool Lifeguard Qualification (NPLQ)

5.3 Training courses

5.3.1 National Rescue Award for Swimming Teachers and Coaches (NRASTC)

NRASTC is a supervision and rescue qualification for teachers working on the poolside or in the water during programmed activities, such as a swimming lesson. It is suitable for teachers working in a wide range of swimming pools where the water is deeper than the teachers' standing depth and meets the Individual sites risk assessment.

Additionally, a drill should be run with every class (pupils and teachers) at every pool on the first lesson of each term to practice an emergency evacuation of the pool and to ensure familiarity with the pool alarm and emergency procedures. It should be repeated as necessary to ensure everybody is aware of the procedures.

5.3.2 National Pool Lifeguard Qualification (NPLQ)

This is a 38-hour RLSS and regulated by Ofqual qualification designed to equip lifeguards to supervise public recreational swimming, to implement safe practice, to operate the EAP and perform first aid if required. To maintain their qualification the NPLQ qualified lifeguard must also undertake regular monthly ongoing training and skills practice.

6. Qualifications to provide the teaching in school swimming lessons

6.1 It is recommended that, for all school swimming lessons, a class teacher always accompanies the class to the pool.

6.2 Where school swimming lessons are being delivered by a specialist instructor, it is essential that school staff remain on poolside at all times.

6.3 Teachers, Teaching Assistants (TAs), HLTAs and AOTTs who cannot swim should not teach swimming but may have a pastoral role. However, it is not advisable to deploy staff to poolside responsibilities if they lack confidence in the role, cannot swim or are reticent about being on the poolside. School staff should have the opportunity to express such a lack of confidence or ability before being deployed in a poolside role.

6.4 It is essential that, for all school swimming sessions, provision is made for lifesaving, first aid and resuscitation cover. If the pool provides a lifeguard, that lifeguard must hold a valid NPLQ. This covers lifesaving, life guarding and first aid (including resuscitation) skills. If no lifeguard is provided, alternative and satisfactory arrangements, in line with this policy document, must be made. This is likely to be the case at most school pools. (See paragraphs 5.2, 5.6 and 6.18)

6.5 Ideally the best qualified swimming teacher/instructor should teach the least able pupils.

However, this will need to consider the ability of all staff in the team to undertake a rescue (if necessary) at the depth of water at which they are working

6.6 Specialist teachers of swimming

6.6.1. Specialist teachers or instructors of swimming must hold, as a minimum qualification:

- ASA Teachers Certificate (Level 2) and
- RLSS Rescue Test for Teachers obtained within the past 2 years.

6.6.2 Where teaching specialist groups, additional qualifications may be required appropriate to the group, for example:

- ASA Teacher for Swimmers with Disabilities

6.6.3 If supervising an un-programmed session, the teacher or instructor must hold a current NPLQ.

6.6.4 Specialist teachers should keep their qualifications updated by attending an appropriate CPD course every two years.

6.7 Class teachers

Where a class teacher is conducting a school swimming lesson without a specialist teacher or instructor of swimming present, that teacher must be qualified to do so.

6.7.1 When leading the teaching of pupils of secondary school age, the class teacher should, as a minimum, hold:

- STA Level Two Certificate in Teaching Swimming – Secondary Teacher

6.7.2 When leading the teaching of pupils of primary school age, the class teacher should, as a minimum, hold:

- ASA National Curriculum Training Programme Module 2

Class teachers should must never teach swimming lesson without at least one other person present to assist with first aid and rescues if necessary. The numbers and level of support will depend upon the circumstances such as the age of the group, their individual needs and the size of the teaching pool.

6.7.3 Where a class teacher is assisting with a school swimming lesson alongside a specialist teacher, instructor of swimming, class teacher, TA, HLTA or Adult Other Than Teacher who is fully qualified to lead a school swimming lesson (see sections 6.7.1 and 6.7.2), the class teacher must be qualified to do so.

6.7.4 When assisting with the teaching of pupils of secondary school age the class teacher should, as a minimum hold,

- STA Level Two Certificate in Teaching Swimming STA Certificate in Teaching Swimming – Secondary Teacher

6.7.5 When assisting with the teaching pupils of primary school age the class teacher should, as a minimum, hold:

- ASA National Curriculum Training Programme Module 1

6.8 TAs, HLTAs and Adults Other Than Teachers (AOTTs)

When an adult other than a teacher is involved with school swimming, they should be given a clear understanding of what is expected from them.

Where TAs or HLTAs are conducting a school swimming lesson without a class teacher, specialist teacher or instructor of swimming present, that person must be qualified to do so.

6.8.1 When leading the teaching of pupils of secondary school age, they should, as a minimum, hold:

- ASA Teachers Certificate Level 2

6.8.2 When leading the teaching of pupils of primary school age, they should hold, as a minimum:

- ASA National Curriculum Training Programme Module 2

6.8.3 Where a TA, HLTA or AOTT is assisting with a school swimming lesson alongside a specialist teacher or instructor of swimming or a class teacher, TA, HLTA or Adult Other Than Teacher who is fully qualified to lead a school swimming lesson (see sections 6.7.1, 6.7.2, 6.8.1 and 6.8.2), the TA, HLTA or AOTT must be qualified to do so.

6.8.4 When assisting with the teaching of pupils of secondary school age the TA, HLTA or AOTT should, as a minimum, hold:

- STA Award in Swimming Teaching

6.8.5 When assisting with the teaching of pupils of primary school age the TA, HLTA or AOTT should, as a minimum, hold:

- Swim England Level 1 Swimming Assistant (Teaching)

6.9 All accompanying staff should have undergone an induction course, provided by the Pool Manager, on the NOP and EAP of the pool they are using and ensure that they are clear about the role they will be expected to play in an emergency.

7. Qualifications to provide lifesaving cover

7.1.1 Specialist teachers of swimming

Specialist teachers or instructors of swimming who are providing the lifesaving cover for a school swimming lesson will hold, as a minimum qualification:

- National Rescue Award for Swimming Teachers & Coaches (NRASTC)

7.1.2 If supervising an un-programmed session, the teacher or instructor must have a National Pool Lifeguard Qualification

7.2 Class teacher

Where a lifeguard is on duty or the class teacher is working under the direction of a specialist swimming teacher, other class teacher, TA, HLTA or AOTT, who is qualified and contracted to provide the lifesaving cover, the class teacher needs no lifesaving qualification.

If the class teacher is the person identified to provide the lifesaving cover for a school swimming lesson, then they must be qualified to do so.

7.2.1 When providing the lifesaving cover for pupils of either primary or secondary school age for a programmed session within a school swimming lesson the class teacher should, as a minimum, hold:

- STA Pool Safety Award

7.2.2 When providing the lifesaving cover for pupils of either primary or secondary school age for an unprogrammed session within a school swimming lesson the class teacher should, as a minimum, hold:

NPLQ

7.3 TAs, HLTAs and Adults other than teachers (AOTTs)

Where a lifeguard is on duty or the TA, HLTA or AOTT is working under the direction of a specialist swimming teacher, class teacher or TA, HLTA or AOTT, who is qualified and contracted to provide the lifesaving cover, the TA, HLTA or AOTT needs no lifesaving qualification. If the TA, HLTA or AOTT is the person identified to provide the lifesaving cover for a school swimming lesson then they must be qualified to do so.

7.3.1 When providing the lifesaving cover for pupils of either primary or secondary school age for a programmed session within a school swimming lesson the TA, HLTA or AOTT should, as a minimum, hold:

- STA Pool Safety Award

7.3.2 When providing the lifesaving cover for pupils of either primary or secondary school age for an unprogrammed session within a school swimming lesson the TA, HLTA or AOTT should, as a minimum, hold:

- **NPLQ**

7.4 All accompanying staff should have undergone an induction course, provided by the Pool Manager, on the NOP and EAP of the pool they are using and ensure that they are clear about the role they will be expected to play in an emergency.

8. Pool plant operation and pool management

8.1 For school pools

The person setting up the safe systems of work in the pool should be trained and aware of both pool plant safety and pool operational safety. These functions and body of knowledge may be split between two persons. It is recommended that schools combine the role of Pool Manager and Pool Plant Operator.

8.2 Pool plant operators

8.2.1 Pool plant operators should have attended a PWTAG (Pool Water Treatment Advisory Group) Approved Pool Plant Operator course this three-day course covers what the plant operator needs to know to keep the pool water reasonably free from the risk of infection spreading, to keep the water clear so that pool users can be seen under the water and to operate a simple school pool plant safely and effectively. This qualification has a three-year validity and can be re-validated by a one-day refresher course

8.2.2 A one day foundation or introductory course is available and may be sufficient for managers of caretakers undertaking a pool plant operator role or as an introduction to newcomers to these responsibilities. It is important that persons responsible for pool plant operators are aware of what is required of pool plant operators and can monitor their work being undertaken.

8.3 **Pool managers**

8.3.1 Persons designated with responsibility for the management of the operation of the pool should be qualified to manage staff involved in operating the pool and should be authorised to control the use of the pool.

8.3.2 The institute of swimming offer a range of operational and supervisory short courses and other management courses which can be tailored to school needs. Where the public use school pools for recreational swimming, operational management skills will be essential.

8.4 **In public pools**

8.4.1 Standards should be to the PWTAG pool plant operator certificate.

8.4.2 Schools are not required to satisfy themselves as to the qualifications of those managing the pool and plant at pools where they swim, but if there is any concern with regard to pool safety (including the clarity and quality of the pool water) this should be reported to the manager of the pool.

8.4.3 Public pools are normally checked by the local environmental health officers. Pools in private houses are not generally checked and are only suitable for domestic use by family and friends and should must not be used by schools or groups.

9. **Records**

9.1 Records of all qualifications of those involved in the teaching of swimming must be maintained, kept up to date and available for inspection if required. The designated person in charge of school swimming shall take responsibility for this.

9.2 Records of incidents and accidents that occur in the swimming pool or pool area should also be maintained and should be available for inspection. A termly review of these will assist with the review of the risks associated with school swimming.

9.3 Records should also be kept of pool water tests taken in school pools. These should be tested manually at least twice a day, four times if used by the public as well. Records should be available for inspection if required showing the signature of the operative conducting the test.

Further information on swimming teaching / lifesaving qualifications

The teaching and lifesaving awards of Swim England, the Swimming Teachers' Association (STA) and the Royal Life Saving Society (RLSS) are important qualifications for swimming teachers, but it should be remembered that these may not indicate up-to-date competence in lifesaving and the

teaching of swimming skills unless re-taken from time to time. Local Authorities and school governing bodies should ensure that specialist swimming teachers, physical education specialists and other school staff, where appropriate, are afforded the opportunity to update their skills in these areas regularly through local or awarding-body professional development modules.

It is recommended that those qualifications that do not have specified renewal period (e.g.: NCTP Module 1 and NCTP Module 2) are updated through attendance at a professional development module at least every two years.

Further information on pool plant operation

HSG179 'Managing Health and Safety in Swimming Pools' 4th Edition 2018 contains guidance on pool plant operation. This guidance can be downloaded directly from the HSE website.

10. Risk assessment (See appendix A)

10.1 At each pool and during each session, the children and the staff participating will all have unique features that place particular demands upon safety. Each pool and each session must therefore be dealt with and treated individually.

10.2 School swimming pools

10.2.1 Where a swimming pool is on a school site, the host school has a responsibility to undertake a suitable and sufficient risk assessment:

- to identify the hazards that might be present at the pool
- to identify how these hazards could harm those using the pool
- to take steps to eliminate and control risks by:
- drawing up a Normal (safe) Operating Procedure (NOP)
- drawing up an Emergency Action Plan (EAP)
- to ensure that hirers or other users are aware of the risks identified and the steps required to control them and to do a practical induction of relevant aspects of the NOP & EAP

10.2.2 Teachers will be expected to undertake a dynamic risk assessment, each time they attend the pool for a teaching session, of the situation at that time and to act to control any identified risks. These will consider:

- the age and ability of the children in each class
- the activities they will be undertaking
- the qualifications of the people leading and supporting the session.

Any specific risks will be covered in Individual Education Plans (IEPs) or contained within the teacher's lesson plans.

10.3 Public pools

10.3.1 Where public pools are used regularly for swimming lessons the Pool Manager should arrange an induction course on the NOP and EAP to ensure that all staff are clear about how the pool operates and the role they will play in an emergency.

10.3.2 The school swimming co-ordinator will:

- obtain a copy of the NOP & EAP for the pool - this should be made available with the conditions for hire or hiring arrangements by the pool management
- make this available to all staff and AOTTs who are involved in school swimming sessions at the pool. This should be re-issued periodically when reviewed but the school may wish to check, annually, with the pool management to ensure its validity
- ensure the risk assessments for each session have been carried out by the teacher in charge of the session
- record staff training in the implementation of the NOP and EAP. It is important that arrangements are made for a practical induction whenever new staff attend at the pool. It is the responsibility of the school to inform the pool of any new staff attending.

10.4 Hydrotherapy pools

Water-based activity in hydrotherapy pools requires higher levels of supervision, often on a one-to-one basis in the water. These are not deep-water pools and so, for teachers and physiotherapists, the RLSS National Rescue Test for Swimmers with Disabilities is an appropriate qualification for lifeguarding the pool. Adults in the water are only able to supervise the swimmer they are assisting and should not be counted in the supervising ratios. The lifeguarding duties must be carried out by qualified people on the side of the pool.

Physiotherapists should have completed a course in managing hydrotherapy activities.

There are no national qualifications for teaching swimming activities to children who have severe learning difficulties. A variety of skills are required stemming from an assessment of each child's individual requirements. Schools with hydrotherapy pools should establish a suitable and sufficient training and shadowing programme for new teachers to work with experienced staff before they take full responsibility for swimming sessions. This induction can take place within or between schools.

10.5 Using pools on educational visits

Where school parties use swimming pools as part of an educational visit the above conditions should still be applied.

Use is likely to be of a recreational nature. A qualified lifeguard must be on duty and teachers must work with the lifeguard to supervise the session. They should not stand together, or sit talking on poolside but should actively work together as part of a team safeguarding all the children.

If the pool has no lifeguard cover and the school is providing its own lifeguard, arrangements should be made to ensure sole use of the pool, so that other guests do not increase the numbers in the water.

Where the lifeguarding duty is given to an appropriately qualified student, the teacher will retain overall supervision responsibilities to guarantee appropriate levels of behaviour and adherence to pool rules.

10.6 Open water

Open inland water such as rivers, lakes, reservoirs or canals will present an unacceptable level of risk. These include vegetation and other underwater obstructions, sudden changes in depth and pollution.

The only exception will be where swimming takes place as part of a water sports activity such as canoeing, windsurfing or rafting, supervised in accordance with the County Council's Offsite Visits Policy. Guidance for offsite visits can be found by visiting the outdoor education page on Kelsi

If the open water is a recognised bathing place, then the safety rules relevant to sea bathing must apply.

10.7 Swimming in the sea

Swimming in the sea is considerably less safe than in a swimming pool. Safety can be further reduced when adverse conditions apply - bad weather, low temperatures and any undertow, therefore in these conditions swimming in the sea must be avoided.

The risk assessment should consider the need for:

- a minimum of two staff and ratio of 8:1 child to staff
- a qualified beach lifeguard watching the group from the edge
- an additional person able to do resuscitation
- thorough knowledge of conditions on the beach
- an agreed and restricted swimming/paddling area and depth within the permitted swimming zone which will be dependent on
- age / swimming ability / conditions / safety provision
- emergency signals, both visual and audible, to be given to the group and the need for:
- whistle / first aid equipment / lifesaving items
- The ability to account for all pupils at all times

Open Water – Qualifications for lifesaving/lifeguarding	
Environment	Qualification
Open Water – Sea	RLSS National Beach Lifeguard - Coastal or RLSS Bronze Cross or RLSS Silver Cross
Open Water – Mediterranean (non-tidal, sheltered locations only)	RLSS Bronze Medallion or RLSS National Beach Lifeguard - Coastal

Open Water - River	RLSS National Beach Lifeguard – Inland or RLSS Bronze Cross
--------------------	--

10.8 Paddling in the sea

Please refer to the Outdoor Education Unit's Educational Visits and Offsite Activities Guidance on Paddling. Guidance is available on Kelsi

10.9 Swimming attire

10.9.1 Pupils should wear appropriate costumes for swimming that conform to safety, cultural and teaching requirements. It is important that swimming clothing are relatively tight fitting so as to minimise the effect of drag that waterlogged clothing can create. Sensitivity is required to ensure:

- the correct balance when cultural demands require looser fitting garments
- the need to be able to see the movements that limbs and joints are making in the water to ensure appropriate learning

10.9.2 Pupils should not be excluded from swimming because of verrucae or similar foot infections. Swimming can continue provided a verruca sock covers the infected area.

10.9.3 Children who swim frequently or whose eyes are susceptible to irritation may request to use goggles for swimming. Parents should be informed of their responsibility to teach their child to put on and take off goggles in the correct and safe fashion. The following paragraph would be a suggestion of an insert to place into a letter to parents:

Please ensure that goggles are of a good quality, please read the manufacturer's instructions for putting them on and taking them off. This is important to ensure protection of eyes from impact damage through stretching the eyepieces away from the face with wet fingers. You should be aware that on occasions your child will be asked to remove their goggles in order to safely perform certain aquatic activities'

11. Normal operating procedure (NOP)

11.1 Schools with their own pools will need to draw up or review their own risk assessment as a basis for recording the safe operating procedures for their pool. This will include the Normal Operating Procedure (NOP) to maintain safety and an Emergency Action Plan (EAP), detailing exactly what everyone does should an emergency occur.

11.2 Schools using other people's pools regularly will need to be aware of the NOP in order to ensure that they do what is expected of them to keep themselves and others safe, and aware of the EAP to know what to do in an emergency.

11.3 Staff will need to be trained to follow the safety rules included in these procedures and should practice emergency procedures at the start of each term with the children in their classes.

11.4 Training in the NOP and EAP should be recorded by the school, signed by the person giving the training and records kept for a period of at least five years.

11.5 **Guidance for schools with pools – writing a normal operating procedure:**

- draw a plan of the pool, noting dimensions and depths; features and equipment; entry points and the emergency exit routes; pool alarms; fire alarms and any other relevant information. Include the pool address, telephone number and name of the responsible person and describe how the pool is to be managed and used. Also include the maximum pool bather capacity
N.B. The floor plan for the pool area may help with this
- list the key hazards to alert users to things they need to be aware of and hazards to be avoided
- record communications methods: rules for safety; arrangements for passing on safety messages to any users; any policies or pool rules or access rules for controlling groups or individuals, and procedures for the enforcement of safety rules
- rules of supervision: ratios of staff to pupils; qualifications of staff; arrangements for life guarding; training arrangements and frequency; what helpers should be doing; how and what to observe in the pool and where to be positioned
- systems of work and operational systems: lines of supervision; regular checks on pool safety to be carried out, maximum times for lifeguard to be on the pool and any other control and safety systems in place
- detailed work instructions: for instance, for pool cleaning; pool plant operation; pool testing; chemical safety; setting up equipment; use of equipment
- first aid supplies and training including the equipment to be provided and its location; arrangements for checking contents, replenishing stock, first aiders, first aid training, disposal of sharps, dealing with blood and vomit spillage and the reporting and recording of incidents and accidents
- details of alarm systems and other emergency equipment: their location; operation; arrangements of testing; maintenance and action if sounded

A template to assist in the preparation of a normal operating procedure can be located at appendix B

Include in the normal operating procedure

11.6 **Teacher position**

11.6.1 The swimming teacher in charge of the group shall be teaching from the side of the pool where the whole group can be seen and from where feedback can be given on the performance of each individual in the group.

11.6.2 There may be some circumstances in which it is appropriate for the teacher or a classroom assistant to be in the water supporting individual children, but this would be the exception rather than the rule and only following a careful risk assessment of all the potential factors at play (depth of water, pupil ability, use of flotation aids, size of pool, number and age of pupils, life guarding arrangements).

11.6.3 The teacher or assistant in charge of a group must ensure that at all times they can see all the pupils and NEVER turn their back on a group or position themselves so that pupils are behind them.

11.6.4 When teaching or instructing non-swimmers or weak swimmers in duck diving or underwater swimming the teacher of the group should be positioned on poolside at the point nearest to that activity, but so that they can also see the rest of the class.

11.6.5 If there is glare on the pool surface and the bottom of the pool cannot be clearly seen:

- In an indoor pool coat or obscure the window letting the light in and/or move to a position so that anything on the bottom of the pool can be seen.
- In an outdoor pool the teacher / lifeguard should position themselves so that the light does not bounce back into their eyes as glare

11.6.6 Teachers with a pastoral role (normally teachers who are non-swimmers themselves) and are not involved in teaching swimming should none the less be positioned such that they are able to support the swimming instructor in the control of children but not so as to be in the way of those working on poolside. Their position must be specified in the NOP.

11.7 Teacher clothing and equipment

11.7.1 Teachers should change into suitable footwear to be able to move easily around poolside and not bring outdoor dirt onto the pool surround on their feet. They should wear clothes suitable to the humidity and temperatures of the pool and appropriate to the possibility of having to go into the pool to rescue a child.

11.7.2 For outdoor pools a peaked hat and polarised sunglasses may be beneficial. If teaching for prolonged periods a suitable sunscreen should be worn bearing in mind the additional reflection of the sun's rays from the water.

11.7.3 Teachers should all be equipped with a whistle and familiar with the standard signals used in most pools, to either use their whistle correctly or respond to a whistle communication from someone else:

- **one short blast** calls for attention of pool users
- **two short blasts** call for the attention of a lifeguard or member of staff
- **three short blasts** indicate a lifeguard taking emergency action
- **one long blast** calls for the pool to be cleared

11.8 Safety equipment

11.8.1 All pools must be equipped with a means of raising an alarm and summoning support in the event of an accident or incident. Ideally this will be an emergency button which activates a siren or a telephone giving direct contact with the emergency services.

11.8.2 There should be a long pole at either side of the pool to reach and rescue anyone in difficulties and therefore minimising the need to enter the water.

11.8.3 Adequate buoyancy aids and first aid equipment, including a blanket should be immediately to hand.

11.8.4 Pool depths should be clearly marked on the walls of the pool and teachers should explain their significance to pupils, especially beginners. In school open air pools this could be a painted depth line on the fence so that children can stand next to it to see where the water will come up to when they get in.

11.8.5 All signs should be compliant with the Safety Signs and Signals Regulations 1996 third edition.

11.8.6 A pool divider, usually a rope, should be positioned to separate deep from shallow water when non-swimmers are present.

11.8.7 All pools should be able to be locked off and isolated to prevent unauthorised access when not manned. Failure to achieve this is a major cause of accidents in school and private pools.

11.9 First aid arrangements

11.9.1 All establishments must make sure that they regularly check the arrangements for first aid on a regular basis.

11.9.1.1 In school pools: There must be a qualified first aider (First Aid at Work) available at all times that the pool is in use. This can be a member of school staff. When a hiring takes place, the hirer must be able to provide a first aider.

11.9.1.2 In public and other pools: It is the responsibility of the pool operator to ensure that there is a first aider on site or to ensure that the school provides their own first aider.

11.9.2 In the event of an accident occurring which requires first aid, this must be recorded on the accident form of the pool being used and the school should request a copy for their own records.

11.9.3 Accidents where a pupil is taken directly to hospital should be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR).

12. Emergency Action Plans

12.1 An emergency action plan details what everyone should do in the event of a reasonably foreseeable emergency. This might include but not limited to:

- overcrowding
- disorderly behaviour
- assault
- lack of water clarity
- fire

- bomb threat
- structural failure
- emission of toxic gases
- serious injury to swimmer
- discovery of a casualty in the pool

12.2 The procedure should explain how to clear the pool and/or evacuate the building / site, the roles of all the staff involved, how to call for help and what help to give to the people involved.

12.3 All staff likely to be involved in this procedure and all outside user group leaders who may be affected need to be trained to ensure their effectiveness in an emergency. This explains the need for all user groups to be aware of the EAP and in a public pool this is an excellent reason for running evacuation drills when the public are using facilities.

12.4 Notices need to be displayed to advise pool users of the arrangements in the event of an emergency.

12.5 Exit doors and signs, firefighting equipment and alarm points need to be checked regularly to ensure that they are working and accessible

12.6 All fire doors must be operable without the aid of a key at all times when the pool is in use. These should be checked at the start of every day as well at the start of every session.

A template to assist in the preparation of an EAP is attached at Appendix C

13. Pool rules

13.1 The pool rules should be explained to all pupils before their first swimming lesson. Pupils should be reminded at the start of each term, ideally when the emergency procedures are tested with pupils and staff.

- never go onto poolside until a member of staff is present
- do not enter the water until instructed to do so
- no running on poolside
- no chewing gum or eating sweets or other food on poolside
- no shouting or whistling
- no jumping in or diving in, except under instruction
- no pushing others in
- no holding others under the water or deliberately splashing them
- no jewellery to be worn
- no outdoor shoes on poolside
- swim caps to be worn if requested
- to leave the pool on one long blast of the whistle
- follow all instructions from staff and obey them promptly

13.2 Pool rules may vary from pool to pool and a copy should be provided to schools using public pools, together with the NOP, in advance of pool hire.

13.3 There are also rules for lifeguards to follow to ensure that they remain vigilant at all times. Where appropriate* these techniques should also be practiced by school staff in supporting qualified lifeguards.

- never leave the poolside unattended*
- always secure poolside against unauthorised access when it is not manned*
- never turn their backs on the pool or engage in any behaviour which results in not watching the pool when on lifeguard duty*
- divide the area up into zones and use techniques to constantly scan the area, counting heads, watching out for vulnerable or weak swimmers*
- keep alert, move position every five minutes or so - sit, stand, patrol
- rotate off poolside at least once in every hour

14. **Diving**

14.1 Additional hazards are created when swimmers are allowed to dive into the pool. These need to be carefully managed.

- teaching diving should only be undertaken by a specialist teacher
- no diving shall be permitted in less than 1.5 metres of water depth or with less than 7.6m forward clearance
- only very flat horizontal dives should be permitted
- diving blocks and stages must conform to Federation International de Natation (FINA) /ASA regulations

15. **Conditions of hire**

15.1 Pool operators cannot delegate responsibility for what happens in their pools, therefore if a school pool is hired to an outside organisation the school will need to ensure that the outside organisation will use the pool in a safe manner.

16. **Child protection**

16.1 The Local Authority and the school will have their own child protection policies and procedures in addition to this the pool should have as well. It is important that the pool procedures relate to those of the Local Authority. Details of this should preferably be within the conditions of hire.

16.2 Each pool should have a designated person with responsibility for child protection who should liaise with the designated teacher in the event of a concern about a child. The name of this person at the pool should be publicised to school and public users in order that concerns can be reported to them.

16.3 All persons working with children should have an up to date DBS check. This includes parent helpers who may sometimes support swimming lessons.

16.4 Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise children and that children are safeguarded from members of the public.

16.5 Staff must report any unexplained marks or bruises noticed on a child during changing to the schools designated person immediately.

16.6 When supervising children changing or assisting them with their swimming, pool and school staff and AOTTs should avoid physical contact with children unless it is:

- essential to develop a swimming skill or technique
- to treat an injury
- to prevent an injury
- to prevent them getting into difficulty
- to meet the requirement of the activity (e.g. Lifesaving)
- to lift or manually support a child with disabilities

In these circumstances the adult should explain the reason for the physical contact to the child. Unless the situation is an emergency the adult should ask the child for permission. If children have disabilities, they and their carers need to be involved in deciding what assistance should be offered and the child should be treated with dignity and respect.

16.7 Where a child sustains an injury and any first aid is administered the parents/carers should be informed as soon as is possible. Details should be recorded and retained by the school in line with normal retention of accident forms. Accidents and incidents which occur at a public pool should also be recorded by pool staff on their forms for their records.

16.8 In the event of a child needing to be taken to hospital for treatment, a representative from the school must always accompany the child. If this leaves the school group short of staff at the pool, then the school should be informed to seek additional staffing for the group. The parent/carer of the child should be informed as soon as is possible.

16.9 Staff and AOTTs should avoid placing themselves at risk by being alone with a child and should ensure that wherever possible there are other responsible persons around and that they are in public view.

17. Acronyms & abbreviations

afPE	Association for Physical Education
AOTT	Adults Other Than Teachers
CPD	Continuing Professional Development
CIMSPA	Chartered Institute for the Management of Sport and Physical Activity
DBS	Disclosure & Barring Service

DCMS	Department for Culture, Media & Sport
DCSF	Department for Children, Schools & Families (formerly DfES)
EAP	Emergency Action Plan
FINA	Federation Internationale De Natation (International Swimming Federation)
HLTA	Higher Level Teaching Assistant
IEP	Individual Education Plan
LEA	Local Education Authority
NaRS	National Rescue Standard Pool Safety Award
NOP	Normal Operating Procedure
NPLQ	National Pool Lifeguard Qualification
PE	Physical Education
PESSCL	PE, School Sport and Club Links Strategy
PDM	Partnership Development Manager
PWTAG	Pool Water Treatment Advisory Group
QCA	Qualifications & Curriculum Authority
RLSS	Royal Life Saving Society
SSCo	School Sport Co-ordinator
SSP	School Sports Partnerships
STA	Swimming Teachers Association
TA	Teaching Assistant

19. Contacts

Health and safety unit 03000 418456

Outdoor Education Unit 03000 413971

20. Websites

Amateur Swimming Association www.britishswimming.org

QCA lesson ideas <http://www.qca.org.uk/>

Royal Life Saving Society <http://www.rlss.org.uk/>

Swimming Teachers Association <https://www.sta.co.uk/>

Chartered Institute for the Management of Sport and Physical Activity <https://www.cimspa.co.uk/>

The Pool Water Treatment Advisory Group <https://www.pwtag.org/>