



# **SAFE PRACTICE IN SCHOOL SWIMMING**

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## Contents

INTRODUCTION .....	3
SCHOOL RESPONSIBILITIES .....	3
1. SWIMMING IN PUBLIC POOLS .....	5
1.1 LIFEGUARD PROVISION	
1.2 TEACHER PROVISION	
1.3 TEACHER TO PUPIL RATIOS	
1.4 SUPERVISION OF CHANGING FACILITIES	
1.5 RECORDS	
1.6 RISK ASSESSMENTS, NOP, EAP	
1.7 FIRST AID	
1.8 POOL PLANT OPERATION AND MANAGEMENT	
2. SWIMMING IN SCHOOL POOLS .....	8
2.1 LIFEGUARD PROVISION	
2.2 TEACHER PROVISION	
2.3 TEACHER TO PUPIL RATIOS	
2.4 SUPERVISION OF CHANGING FACILITIES	
2.5 RECORDS	
2.6 RISK ASSESSMENTS, NOP, EAP	
2.7 FIRST AID	
2.8 POOL PLANT OPERATION AND MANAGEMENT	
2.9 CONDITIONS OF HIRE	
3. SWIMMING IN PRIVATE POOLS .....	14
3.1 LIFEGUARD PROVISION	
3.2 TEACHER PROVISION	
3.3 TEACHER TO PUPIL RATIOS	
3.4 SUPERVISION OF CHANGING FACILITIES	
3.5 RECORDS	
3.6 RISK ASSESSMENTS, NOP, EAP	
3.7 FIRST AID	
3.8 POOL PLANT OPERATION AND MANAGEMENT	
4. SWIMMING ATTIRE .....	15
5. POOL RULES .....	15
6. DIVING .....	16
7. CHILD PROTECTION .....	16
8. OTHER POOL ENVIRONMENTS .....	17
10.1 HYDROTHERAPY POOLS	
10.2 EDUCATIONAL VISITS	
10.3 OPEN WATER	
10.4 SEA BATHING/SWIMMING	
APPENDIX A – TEACHER QUALIFICATIONS AND TRAINING .....	19
APPENDIX B – INFORMATION TO INCLUDE IN THE NOP .....	22
APPENDIX C – INFORMATION TO INCLUDE IN THE EAP .....	23

## INTRODUCTION

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. We owe it to our youngsters to give them the best chance to learn to swim, as well and as early as possible.

Nonetheless, it is one of the few recreational or teaching activities which also carries with it the evident hazards of death through drowning or injury by brain damage through near drowning. The teaching and learning of swimming and water safety therefore requires the utmost care on the part of all concerned.

The purpose of this document is to provide guidance on safe practice in school (primary, secondary and private) swimming, whether at a school pool, hydrotherapy pool or public pool.

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

- the Risk Assessment for the pool and session used
- the Normal Operating Procedure (NOP)
- the Emergency Action Plan (EAP)
- conditions of hire - if relevant
- pool rules
- any special needs or medical conditions of pupils.

This document sets out the policies and procedures of Wiltshire Council in relation to swimming pool safety. The Appendices contain model procedures and forms which must be made specific to each school pool.

## SCHOOL RESPONSIBILITIES

The Governing Body 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 proper operation of the school's own swimming facility or use of a third party pool. It also includes monitoring and recording, for the pool and sessions used, of the

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

Ideally a specialist swimming teacher or swimming instructor should always be present when children are being taught swimming; however the standard and quality assurance of swimming teaching is solely the responsibility of the school.

Teaching staff are expected to be present at all times to ensure the ratio numbers as outlined at 1.3 below are followed at all times so the school must provide enough teachers or assistants to suitably cover all those present.

### 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. The law has often described this responsibility as equivalent to the standard expected of a reasonable and careful parent. 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 enforced
- 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.

### **Adults supporting learning**

Adults supporting learning (ASLs) can be extremely helpful and may be absolutely essential, to support 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 unwell children or children who are not swimming

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

Higher Level Teaching Assistants who have the required specific competencies may replace a teacher who does not.

ASLs should be vetted by the Criminal Records Bureau to work with children.

### **Specialist swimming teachers**

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

They have responsibility for ensuring the safe conduct of the class in the water and on 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 every term with each class taught
- working with the lifeguards on duty or, if there are no lifeguards, providing lifesaving and first aid skills on their own or with others
- entering the water and effecting a rescue if necessary.

They must be vetted by the Criminal Records Bureau to work with children.

## **1. SWIMMING IN PUBLIC POOLS**

(those managed by or on behalf of Wiltshire Council)

### **1.1 LIFEGUARD PROVISION**

- 1.1.1 Pool operators have a responsibility for the safety of all who use their pools
- 1.1.2 The pool operator has responsibility for life guarding / rescue and resuscitation, and all Lifeguards will be suitably trained and qualified with a National Pool Lifeguard Qualification
- 1.1.3 The pool operator WILL provide lifeguard provision for all school swimming at a cost to the school
- 1.1.4 Lifeguards will work with class teachers and teachers of swimming with regards safety in the pool and their instructions should be followed at all times
- 1.1.5 It is the responsibility of the pool operator to ensure that there are sufficient numbers of qualified lifeguards (NPLQ) for the session
- 1.1.6 A swimming instructor can be a lifeguard, if they have the relevant qualification (NPLQ) however they will only lifeguard their group/station and NOT the whole pool. This is at the discretion of the pool operator

### **1.2 TEACHING PROVISION**

- 1.2.1 The standard and quality of the swimming teaching/instruction is the responsibility of the school and not the pool operator
- 1.2.2 The centre can provide, if requested, at a cost to the school, a swimming instructor who will be qualified to a minimum ASA Level 1 or equivalent and will teach to the ASA teaching guidelines
- 1.2.3 It is highly desirable that for all school swimming lessons a class teacher accompanies the class to the pool
- 1.2.4 Ideally the best qualified swimming instructor should teach the least able pupils. However this will need to take into account the ability of all staff in the team to teach effectively at the depth of water at which they are working
- 1.2.5 Irrespective of who teaches swimming the teacher to pupil ratios as outlined below at 1.3 must be followed at all times so the school must provide enough teachers or assistants to suitably cover all those present
- 1.2.6 If the pool operator provides a swimming instructor they could be utilised as a lifeguard if they hold the relevant qualification (NPLQ) but only for the group/station they are teaching and NOT the whole pool
- 1.2.7 A teacher of swimming who is also responsible for life guarding 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 effect a rescue

## 1.3 TEACHER TO PUPIL RATIOS

- 1.3.1 Each pool will have a designated maximum bather capacity appropriate to the size of the pool which is specified in the Normal Operating Procedure and available from the centre
- 1.3.2 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:

### **12:1**

**Non-swimmers and beginners** – 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** – Irrespective of their swimming ability, group size should be restricted

### **20:1**

**Improving swimmers** – 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** – 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 deepwater experience should be considered

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

### **30:1**

**Competitive swimmers** – Training only with very competent swimmers

### **Specialist swimming activities - various**

For more information about the appropriate ratios for specialist activities (i.e. diving, canoeing) please contact the centre. For any specialist activity the centre procedures must be adhered to.

### **Swimmers with disabilities 1 - 8:1** (with an appropriate number of helpers)

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 child

The Disability Discrimination 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 swim

## **1.4 SUPERVISION OF CHANGING FACILITIES**

### **1.4.1 It is the responsibility of the school to ensure gender balance and supervise changing**

#### 1.4.2 Children must 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 ASLs) 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 operator

#### 1.4.3 Teachers 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

#### 1.4.4 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 can be asked, wherever possible, to make arrangements for separate areas or times to enable this to happen. Where this cannot be achieved appropriate supervision arrangements can be discussed and agreed between the pool and school

#### 1.4.5 Where changing takes place in open plan public single sex changing rooms, a specific arrangement, as mentioned above, can be made with the pool operators 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 be vetted by the Criminal Records Board (CRB)

## **1.5 RECORDS**

### 1.5.1 Qualification records of staff supplied by the pool operator will be maintained and kept up to date by the pool operator and can be available for inspection by the school if required

### 1.5.2 Records of incidents and accidents that occur in the swimming pool or pool area will be maintained by the pool operator and are available for inspection upon request. The pool operator will review these to assist with the review of the risks associated with school swimming

## **1.6 RISK ASSESSMENTS, NOP, EAP**

- 1.6.1 Each pool and each session, the children and the staff participating will all have unique features that make particular demands upon safety. Each pool and each session must therefore be dealt with individually
- 1.6.2 The pool operator should arrange an induction on the Operating and Emergency procedures to ensure that school staff are clear about how the pool operates and the role they will have to play in an emergency. This should be completed periodically
- 1.6.3 The school swimming co-ordinator:
- can request a meeting with the pool operator regarding the operating and emergency procedures and risk assessments
  - ensure all those that require it receive the induction course as 1.6.2
  - will ensure the risk assessments for each activity have been carried out
  - 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

## **1.7 FIRST AID**

- 1.7.1 It is the responsibility of the pool operator to ensure that there is a first aider on site

## **1.8 POOL PLANT OPERATION AND POOL MANAGEMENT**

- 1.8.1 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
- 1.8.2 Public pools are normally checked by the local environmental health officers

## **2. SWIMMING IN SCHOOL POOLS**

### **2.1 LIFEGUARD PROVISION**

- 2.1.1 Someone must always have the responsibility for life guarding / rescue and resuscitation, and must be suitably trained and qualified in accordance with the circumstances applying
- 2.1.2 Whoever it is, the person responsible for life guarding and rescue will:
- be familiar with the pool NOP & EAP
  - maintain constant observation of the pool and pool users
  - carry out rescues and initiate any other emergency action required
  - be able to effect 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

- 2.1.3 In a school pool with deep water:



#### 2.1.3.1 **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: ROYAL LIFE SAVING SOCIETY (RLSS)  
NATIONAL RESCUE AWARD FOR SWIMMING TEACHERS &  
COACHES

Where lifeguards are present and responsible for supervising the safety of the children being taught, teaching staff and ASLs will not be required to have rescue skills but should understand the basics of teaching swimming

The life guarding arrangements need to be agreed with the pool management within their conditions of hire

#### 2.1.3.2 **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 life guarding standard will be required, as per normal public swimming supervision

MINIMUM QUALIFICATION: NATIONAL POOL LIFEGUARD  
QUALIFICATION (NPLQ)

Un-programmed sessions should 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 ASLs will need to be trained to do this and should work under the direction of the qualified pool lifeguard staff

#### 2.1.3.3 **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: RLSS NATIONAL RESCUE AWARD FOR  
SWIMMING TEACHERS & COACHES

Where shared use is not in defined areas then the standard of life guarding provision should be as for an un-programmed session

MINIMUM QUALIFICATION: NPLQ

#### 2.1.4 In school shallow water learner pools:

##### 2.1.4.1 **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 and this safety cover may be provided by a teacher provided they have the appropriate qualifications to teach, apply first aid and effect a rescue and have appropriate support for the number of pupils being taught. A teacher should not be working on her/his own in the pool

## MINIMUM QUALIFICATION: LOCAL AUTHORITY WATER SAFETY COURSE

### 2.1.4.2 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 life guarding standard will be required, on a par with normal public swimming pool supervision

## MINIMUM QUALIFICATION: NPLQ

Un-programmed sessions should not be run unless an NPLQ lifeguard is in position, 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 will need training to do this and should work under the direction of the qualified pool lifeguard

## 2.2 TEACHING PROVISION

- 2.2.1 It is essential that for all school swimming lessons a class teacher always accompanies the class to the pool
- 2.2.2 Ideally the best qualified swimming instructor should teach the least able pupils. However this will need to take into account the ability of all staff in the team to effect a rescue (if necessary) at the depth of water at which they are working
- 2.2.3 Irrespective of who teaches swimming the teacher to pupil ratios as outlined above at 1.3 must be followed at all times so the school must provide enough teachers or assistants to suitably cover all those present
- 2.2.4 A teacher of swimming who is also responsible for life guarding 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 effect a rescue

## INFORMATION ON THE NECESSARY TEACHER QUALIFICATIONS AND TRAINING IS ATTACHED AT APPENDIX A

## 2.3 TEACHER TO PUPIL RATIOS

- 2.3.1 Each pool will have a designated maximum bather capacity appropriate to the size of the pool which should be specified in the Normal Operating Procedure
- 2.3.2 The ratios can be found under section 1.3.2

## 2.4 SUPERVISION OF CHANGING FACILITIES

- 2.4.1 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 ASLs) 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

2.4.2 Teachers 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

2.4.3 Children should be able to change with no members of the public present

## **2.5 RECORDS**

2.5.1 Records of those involved in the teaching of swimming must be maintained, kept up to date and available for inspection if required. The person responsible for this is the designated person in charge of school swimming

2.5.2 Records of incidents and accidents that occur in the swimming pool or pool area should be maintained and should be available for inspection upon request. These should be reviewed annually to assist with the review of the risks associated with school swimming

2.5.3 Records should also be kept of pool water tests taken. 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. They should be signed by the person taking the test

## **2.6 RISK ASSESSMENTS, NOP, EAP**

2.6.1 Each pool and each session, the children and the staff participating will all have unique features that make particular demands upon safety. Each pool and each session must therefore be dealt with individually

2.6.2 Where a pool is on a school site, the host school has a responsibility to undertake a risk assessment:

- to identify the hazards that might be present at the pool
- to quantify the risks
- 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

2.6.3 Teachers will be expected to undertake an unwritten risk assessment, each time they attend the pool, of the situation at that time and to take action to control any identified risks. These will take into account:

- 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

- 2.6.4 Schools with their own pools will need to draw up or review their own risk assessment as a basis for writing down 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 if an emergency occurs
- 2.6.5 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
- 2.6.6 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 one year

#### **INFORMATION ON WHAT TO INCLUDE IN AN NOP IS ATTACHED AT APPENDIX B**

- 2.6.7 An Emergency Action Plan details what everyone should do in the event of a reasonably foreseeable emergency
- 2.6.8 The EAP 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
- 2.6.9 All staff likely to be involved in the EAP 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
- 2.6.10 Notices need to be displayed to advise pool users of the arrangements in the event of an emergency
- 2.6.11 All school classes should run practice drills during the first lessons of each term in order that both staff and pupils recognise the alarm signal and know how to respond to it
- 2.6.12 Exit doors and signs, fire fighting equipment and alarm points need to be checked regularly to ensure that they are working and accessible
- 2.6.13 All fire doors must be operable without the aid of a key at all times the pool is in use. These should be checked at the start of every day

#### **INFORMATION ON WHAT TO INCLUDE IN AN EAP IS ATTACHED AT APPENDIX C**

### **2.7 FIRST AID**

- 2.7.1 All schools should make or check the arrangements for first aid
  - There should be a qualified first aider (First Aid at Work) available within call at all times that the pool is in use. This can be a member of school staff or, when hired out to an outside group, the group must be required to provide a first aider

- 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
- Accidents where a pupil is hospitalised should be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

## **2.8 POOL PLANT OPERATION AND MANAGEMENT**

- 2.8.1 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
- 2.8.2 Pool plant operators should be qualified by the ISRM Pool Plant Operators Course, a three-day course covering 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 life and can be re-validated by a one day course refresher and updating course
- 2.8.3 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
- 2.8.4 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
- 2.8.5 ISRM 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

## **2.9 CONDITIONS OF HIRE**

- 2.9.1 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
- 2.9.2 Equally if a school hires a pool from someone else that organisation will need to make sure that the school is supported in the safe use of the pool
- 2.9.3 The mechanism for this is initially the agreement to hire and any conditions of hire imposed by the organisation. The conditions will be re-enforced in the NOP and EAP
- 2.9.4 The agreement to hire should be reviewed at regular intervals - whenever dates and times are confirmed these should be recorded in a signed agreement between the two parties - a simple form, but the hirers should also be given an up to date copy of the relevant NOP and EAP for the facility and any special conditions of hire which might apply to their session

#### 2.9.5 Conditions of hire should include:

- the name and address of the organisation hiring the pool
- the name and address of the pool being hired
- the name of the hirer's representative (*the responsible person - first point of contact*) and contact details
- the activity for which the pool is to be hired (*to assess the level of risk and safety rules required by session type*)
- the numbers participating and their age and swimming ability (*where a school hires a pool for a block involving more than one class with different abilities, ideally the form should be completed to show all this information as the equipment/area of the pool used may need to be different for different groups*)
- specific agreement on the respective responsibilities of the hirer and the pool operator (*for instance who will provide the lifeguarding and the level of life guarding provision to be made, child protection issues, staffing levels*)
- details of who is to be responsible for what in the event of an emergency (*normally it is the operator of the pool who is responsible for building related problems and the hirer for emergencies associated with the activities of the group*)
- any safety advice to be given to swimmers and any specific rules that should be enforced
- a signature from the hirer that they have received and read copies of the NOP & EAP
- appropriate third party liability insurance

2.9.6 Schools operating a free letting procedure to enable children from the school to access extra pool time (for instance PTA summer holiday use) are still bound by the same letting procedures. For unstructured swimming sessions a qualified lifeguard must be present regardless of pool depth. In addition young children require close supervision in the water by an adult over the age of 16:

- 4 years and under in a ratio of 1 adult to 1 child
- 8 years and under in a ratio no more than 1 adult to 2 children

Schools may find it more expedient to arrange structured swimming sessions with a suitably qualified teacher in charge when the usual curriculum arrangements will apply

2.9.7 Where schools do not hire pools but use them on a pay for pupil per head basis, schools are recommended to put in place a reverse procedure confirming their use to the Pool Manager in writing and asking the pool for details of the NOP & EAP, conditions of hire and respective responsibilities

### 3. SWIMMING IN PRIVATE POOLS

Pools in private houses are not generally checked and are only suitable for domestic use by family and friends and should not be used by schools

These guidelines refer to private leisure facilities

#### 3.1 LIFEGUARD PROVISION

3.1.1 The school should ensure that lifeguard provision is of the same standard as a school pool, which can be found under section 2.1

#### 3.2 TEACHING PROVISION

- 3.2.1 The school should ensure that teaching provision are of the same standard as either a public pool, which can be found under section 1.2 or a school pool, which can be found under section 2.2

### **3.3 TEACHER TO PUPIL RATIOS**

- 3.3.1 The school should ensure that the ratios are of the same standard as a school pool, which can be found under section 2.3

### **3.4 SUPERVISION OF CHANGING FACILITIES**

- 3.4.1 The school should ensure that the supervision of changing facilities are of the same standard as a public pool, which can be found under section 1.4

### **3.5 RECORDS**

- 3.5.1 The school should ensure that the records are of the same standard as a school pool, which can be found under section 2.5

### **3.6 RISK ASSESSMENTS, NOP, EAP**

- 3.6.1 The school should ensure that the risk assessments, NOP and EAPs necessary are of the same standard as a public pool, which can be found under section 1.6

### **3.7 FIRST AID**

- 3.7.1 The school should ensure that first aid provision is the same standard as a school pool, which can be found under section 2.7

### **3.8 POOL PLANT OPERATION AND MANAGEMENT**

- 3.8.1 The persons responsible for pool plant and management should have the same standards as a school pool. See section 2.7

## **4. SWIMMING ATTIRE**

- 4.1 Pupils should wear appropriate costumes for swimming that conform to safety, cultural and teaching requirements. It is important that swimming clothing is relatively tight fitting so as to minimise the effect of drag that water logged 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

- 4.2 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

- 4.3 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 suitable insert in 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'

## **5. POOL RULES**

**5.1** 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 and checked with pupils

- 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
- all instructions from staff to be obeyed promptly

**5.2** 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

**5.3** There may also be 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

## **6. DIVING**

**6.1** 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

## **7. CHILD PROTECTION**

**7.1** The LA and the school will have their own child protection procedures and so too should the pool. It is important that the pool procedures relates to those of the LA.



Each school and pool being used by the school should establish a protocol identifying the relationship between their respective procedures. Ideally this should be within the conditions of hire

**7.2** 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

**7.3** All persons working with children should have an Enhanced CRB Disclosure

**7.4** 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

**7.5** When supervising children changing or assisting them with their swimming, pool and school staff and ASLs 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 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

**7.6** Where children sustain an injury and any first aid is administered the parents/carers should be informed as soon as possible. Details should be recorded and retained by the school. Accidents and incidents which occur at a public pool should also be recorded by pool staff on their forms for their records

**7.7** In the event of a child needing to be taken to hospital for treatment, a representative from the school should 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 possible

**7.8** Staff and ASLs 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

## **8. OTHER POOL ENVIRONMENTS**

### **8.1 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 County Rescue Test is an appropriate qualification for life guarding 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 life guarding 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 an apprenticeship 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

## **8.2 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 life guarding 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

## **8.3 OPEN WATER**

Open inland water such as rivers, lakes, reservoirs or canals present unacceptable levels 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 watersports activity such as canoeing, windsurfing or rafting, supervised in accordance with the Council's Educational Visits Policy

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

## **8.4 SEA BATHING/SWIMMING**

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, and in these conditions should be avoided

The risk assessment should take into account the need for:

- a minimum of two staff and ratio of 8:1 children 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. Dependant upon: 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

## **APPENDIX A TEACHER QUALIFICATIONS AND TRAINING**

### **QUALIFICATIONS**

#### **Swimming instructor**

Swimming instructors will be qualified to a minimum ASA Level 1 or equivalent, with the desire to be at least an ASA Level 2 or equivalent

Swimming instructors should never teach swimming 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 and teacher pupil ratios as outlined in 1.3

If they are the lifeguard at the same time as teaching they WILL have achieved the relevant qualification (NPLQ) and will only lifeguard their group/station and NOT the whole pool

#### **Specialist swimming teachers**

Specialist swimming teachers are school teachers with Qualified Teacher Status who also hold an ASA swimming teaching qualification (Level 1 or 2) or equivalent

Where teaching specialist groups additional qualifications may be required appropriate to the group, for example an ASA Teacher for Swimmers with Disabilities

Specialist teachers should keep their qualifications up dated by attending a CPD course every two years

Specialist swimming teachers should never teach swimming 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 and teacher pupil ratios as outlined in 1.3

If they are expected to lifeguard (only at school pools) at the same time as teach they would be expected to have achieved the relevant qualification under section 2.1

#### **Class teacher**

Ideally a class teacher would not conduct a swimming lesson without a specialist teacher or swimming instructor being present. However if they are required to teach swimming they should hold:

- ASA Certificate for Teaching School Swimming (Key Stage 1&2)

Class teachers should never teach swimming 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

If expected to help with the teaching on poolside under the direction of a specialist swimming teacher or swimming instructor, they should have some knowledge or understanding of the principles of teaching swimming. It is desirable that he/she will have:

- an ASA Helper's Certificate (attended within the previous two years)
- undergone the induction course for the pool's NOP and EAP

If they are expected to help with the lifeguarding they would be expected to have achieved the relevant qualification under section 2.1

Class teachers will be expected to develop their skills with supplementary training which can lead to a formal basic swimming teaching qualification training

## **TAs, HLTAs and Adults supporting learning (ASLs)**

Where an adult other than a teacher assists with swimming they should be given a clear understanding of what is expected of them

If expected to help with the teaching on poolside under the direction of a specialist swimming teacher, swimming instructor or class teacher, they should have some knowledge or understanding of the principles of teaching swimming. As a minimum he/she will have:

- undergone the same induction course as that class teacher for the pool's NOP and EAP

And in addition it is desirable he/she will have:

- an ASA Helper's Certificate (attended within the previous two years)

If they are expected to help with the lifeguarding they would be expected to have achieved the relevant qualification under section 2.1

## **TRAINING**

### **Royal Life Saving Society (RLSS)**

#### **National Rescue Award for Swimming Teachers and Coaches (12 hours)**

This training course includes theory and practical work, and covers the competencies and skill that enable teachers / supervisors to deal with an emergency in a pool. A section is devoted to first aid and it has a validity of two years

#### **National Pool Lifeguard Qualification (NPLQ) (38 hours)**

This qualification is 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

#### **National Pool Management Qualification (NPMQ) (32 hours)**

This qualification is designed to equip managers with the essential skills for managing a leisure centre, especially a pool environment. It includes information on risk assessments, NOP, EAP, Induction and training procedures, serious incidents and their legal obligations

### **Amateur Swimming Association (ASA)**

#### **Helpers Certificate (7 hours)**

Designed to equip an adult other than a teacher with the skills required to assist the designated swimming teacher within the school swimming teaching programme. It provides basic technical knowledge, awareness and understanding of some of the health and safety issues, and guidance in how best to assist the designated teacher of swimming

#### **National Curriculum Training Programme Module 1 (7 hours)**

Designed to equip a qualified teacher to work under a specialist swimming instructor or holder of the Primary School Teachers Certificate to teach swimming

#### **National Curriculum Training Programme Module 2 (10 hours)**

Tops up the Module 1 course and equips the teacher to teach without additional supervision - does not cover any rescue or lifesaving

#### **Certificate for Teaching School Swimming (Key Stages 1&2) (17 hours)**

Covers both of the above

**Teachers Certificate Level 1 (32 hours)**

To assist an ASA Teacher working with small groups

**Teachers Certificate Level 2 (Aquatics) (60 hours)**

Competent to organise a programme and organise others

**ISRM****National Pool Plant Operators Certificate (NPPO) (24 hours)**

The course provides essential technical qualification for staff involved in day-to-day pool plant operation, or those responsible for plant management

**For further information contact:**

RLSS [www.rlss.org.uk/](http://www.rlss.org.uk/) or 01789 773994

ASA [www.swimming.org/asa/teaching-and-coaching](http://www.swimming.org/asa/teaching-and-coaching) or 01509 618700

ISRM [www.isrm.co.uk](http://www.isrm.co.uk) or 01509 226474

All schools with their own pools should have a copy of HSG 179 “Managing Health & Safety in Swimming Pools” obtainable from the HSE [www.hse.gov.uk/pubns/books](http://www.hse.gov.uk/pubns/books)

“Safe Supervision” ISRM, £2.30 inc P & P, covers ratios of staff to pupils and the qualifications required for teachers and lifeguards; telephone 01509 - 226474

Refer also to the DfES & DCMS “Swimming Charter” - support for swimming as a strand of National PE, School Sport and Club Links Strategy (PESSCL)

Wiltshire Council are also able to organise some of the course listed above

## APPENDIX B INFORMATION TO INCLUDE IN THE NOP:

- **Details of the pool**, including drawing a plan of the pool, noting dimensions and depths; features and equipment; entries 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
- **Maximum pool bather capacity**
- **List the key hazards** to alert users to things they need to be aware of and hazards to be avoided. This is the basis for the NOP
- **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, dealing with the public and procedures for the enforcement of safety rules
- **Rules of supervision:** ratios of staff to pupils; qualifications of staff; arrangements for life guarding; duties and responsibilities, 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 and 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
- **Conditions of hire:** a copy of a contract for hire showing the duties and responsibilities of each party and arrangements for safety during a hirer's use

## **APPENDIX C INFORMATION TO INCLUDE IN THE EAP:**

The Emergency Action Plan are specific instructions on action to be taken in the event of any emergency.

This should include:

1. Fire evacuation procedure
2. Power failure
3. Bomb threat
4. Structural failure to the building
5. Emission of unknown gaseous substances
6. Gas leak
7. Chemical spillage procedure
8. Poolside emergency procedures
9. Dryside emergency procedures
10. Post incident action
11. Emergency alarms & actions for other situations
  - overcrowding
  - disorderly behaviour
  - assault
  - lack of water clarity, pool contamination
  - emission of toxic gases
  - serious injury to swimmer/member of the public
  - discovery of a casualty in the pool
  - Threat of robbery
  - Lost child
  - Lift failure/entrapment
  - Dealing with needles and sharps
  - Terrorist act
  - Lightning storm
  - Flooding
  - Civil emergencies
  - Serious incident management system