

CONWY COUNTY BOROUGH COUNCIL

Safe Practice in School Swimming Guidance & Procedures

(Version 1.0, May 2018)

Mae'r ddogfen yma ar gael yn y
Gymraeg.

This document is available in Welsh.

About this policy

This policy defines the procedures and protocols for primary and secondary schools who require swimming lessons at Council Leisure Centres and outlines the roles and responsibilities of the relevant parties.

Anyone organising swimming lessons for young people from Conwy County Borough Council should also refer to Conwy County Borough Council planning and approval procedures for Educational visits and follow the relevant guidance (relating to the nature of the visit being planned) as set out in the National Guidance for Educational Visits www.oeapng.info and *AfPE Safe Practice in Physical Education and Sport 2016 Edition*

Revision history

Version	Date	Summary of changes	Date Accepted by Board of Governors
1.0	May 2018	New document	

Date of next review	
This policy will be reviewed in:	12 months
The review will be undertaken by:	Education / Leisure Service

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We are happy to provide this document in alternative formats on request. Please use the above contact details.

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Introduction

The purpose of this document is to set out Conwy's policies, based on national guidance in relation to swimming pool safety and provide guidance on safe practice in school swimming.

The Terms of Reference will apply to:

- Head-teachers
- Governors
- Teachers in charge of school swimming within their school
- School staff accompanying their pupils to school swimming lessons
- Leisure management and pool staff
- Swimming Instructors

Working in partnership will ensure a team approach in the planning and delivery of safe, quality school swimming lessons.

Background

Swimming is a vital life skill. *'It is important that personal survival skills are taught. Pupils should understand the effects and dangers of cold water, their ability to assess a survival situation and the application of the principles of personal survival.'*

(AfPE Safe Practice in Physical Education and Sport 2016 Edition)

In addition, it is a highly beneficial activity for acquiring fitness, a healthy lifestyle and gives access to many other water-based recreational activities.

It is one of the few activities that people can enjoy all their lives either on their own, with family or friends 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 carry with it the evident risks of death through drowning or injury by brain damage through near drowning. The teaching of swimming and water safety therefore requires the utmost care on the part of all concerned.

Contents

	Page
Definitions	1
Responsibilities	1
Normal Operating Procedure	4
Emergency Action Plan	4
Risk Assessment	5
Medical Information	6
First Aid Arrangements	6
Pool Rules	7
Accompanying Pupils to their School Swimming Lesson including FAQ's	7
Teacher: Pupil Ratio including ASA Guidance	8
Amateur Swimming Association Guidelines	9
Diving – Shallow Entry Racing Dives	12
Qualifications for Lifeguard Provision	12
Swimmers Instructor Position	13
Swimmers with Disabilities	14
Guidance on Goggles	14
Child Protection / Safeguarding	15
Supervision of Changing Rooms	17
Conditions of Hire to Outside Organisations	17
Safety Equipment	18
Pool Closures	19
Natural Bather Swimming	19
Paddling in the Sea	20
Managing Activity	21
Everyone should know/ Other Activities	22
Records	23
Routine Maintenance	23
Incidents and Accidents	23
References	23
Appendices	25

Definitions

Teachers in Charge of school swimming within their school:

The named teacher or member of staff responsible for coordinating swimming arrangements for their school.

Accompanying School Staff:

These are the adults employed by the school or volunteers chosen to accompany the children to their swimming lesson.

Leisure Providers:

These are management and pool staff in the leisure centre, who provide school swimming and who are employed by the Council as an internal member of staff or as an external swimming coach.

Swimming Instructor:

The individual in charge of the school swimming lesson, as a minimum, qualified to ASA UKCC Level 1, working towards Level 2.

Swimming Instructor Assistants:

Individuals that can work under the supervision of a Swimming Instructor, qualified to ASA UKCC Level 1.

Lifeguard:

The individual responsible for lifeguarding, rescue and resuscitation of swimmers in difficulty. See Appendix M for appropriate qualifications suitable to pool depth.

Responsibilities

Overall County Council Responsibility

Conwy County Borough Council has a responsibility for ensuring safety in swimming in all Council run schools. As part of this responsibility, the County Council provides the safety policy, guidance and procedures for school swimming.

It also provides a swimming service with centrally employed Disclosure Barring Service (DBS) registered and qualified Swimming Instructors, one of whom is supplied with each lesson and any extra of which, can be supplied at the rate indicated on the Leisure Fees and Charges sheet. **Booking Sheet provided in appendix A.**

School Responsibility

The Governing Body must ensure that a nominated member of staff is delegated the responsibility of 'School Teacher in Charge of Swimming' and applies the Safe Practice in School Swimming Policy to all aspects of school swimming. School Teacher in charge of swimming should liaise with their EVC co-ordinator to ensure the school follows the LA procedures for educational visit planning, approval and monitoring. Staff planning an educational visit must ensure that they follow the procedures set out in this policy.

Governors should be aware of the school swimming policy. The policy will be reviewed on an annual basis and/ or when there is a change in circumstances.

Schools using Council swimming pools will need to request the pool's Normal Operating Plan (N.O.P.) and Emergency Action Plan (E.A.P.) and ensure that accompanying school staff read it and sign following completion of site induction to show an understanding of their responsibilities during the visit to the pool, to keep themselves and the pupils safe. Sign in sheet is provided in appendix B.

Accompanying School Staff

School staff have a duty of care that applies to any activity in which children are involved and this duty of care cannot be transferred to anyone else. This covers all activities within the school curriculum and extra-curricular activities organised by the school during and outside of school hours, whether on or off school premises. www.oeapng.info

In relation to swimming this means that:

- Learners are appropriately supervised when changing.
- Learners are under control at all times.
- A head count is taken before, during and after sessions. This should be recorded in the swimming registers kept by the school.
- The NOP and EAP are enforced; all staff on poolside should be aware of the emergency procedures of any external provision, ensuring that children are aware of what to do in the event of an emergency evacuation. Copy of NOP/EAP can be seen in appendix C.
- School Teachers have an overview of the teaching of their learners and the conduct of their class.
- **School Teachers/staff remain on poolside to provide an assisting role to teach swimming ensuring appropriate footwear.**
- School Teachers have the responsibility for monitoring the progress of the pupils, regardless of who directs the sessions.
- School Teachers should be aware of the special needs or medical conditions of the pupils they are teaching so that correct measures/ precautions can be put in place. Medical history form can be seen in appendix D.
- School Teachers should accompany their own classes to their swimming lessons whenever possible, as they know their children in a unique way.

Leisure Provider

The leisure provider has a duty of care during all sessions and as a minimum the provider will provide the school with the following:

- Induction on the first week of each term and when the school request an induction e.g. new teacher / group of children.

- Induction will include raising awareness of pool and fire alarms.
- To request details of medical conditions before each term – these should be provided by the school 7 days prior to the first lesson.
- Safeguarding – all staff will have a DBS in place
- Roles of staff – staff will be fully aware of their role during school swimming lessons. Staff will attend regular staff training following RLSS guidance.
- Children will be assessed on the first week in regards to their swimming ability.
- Provide a risk assessment in relation to the activity and staff.

The Swimming Instructor

(Qualified as a minimum to ASA UKCC Level 2 or STA equivalent working towards level 2)

Needs to:

- Understand their role in school swimming.
- Work in partnership with the Teacher in Charge of swimming and other school staff accompanying children swimming.
- **Ensure a suitable and sufficient risk assessment is undertaken for each group involved in swimming activities.**
- **Be aware from school staff of any medical, behavioural and special needs of the children in their class - risk assessing these within the context of the swimming environment.**
- Ensure the safe conduct of the class whilst the children are in the water and on the poolside.
- Enable children to have fun in and near water.
- Prepare schemes of work appropriate to the pupils' age and ability - with reference to National Curriculum requirements.
- Ensure appropriate numbers of fully qualified lifeguards, as per N.O.P.

Duty of Care

The overall duty of care for the pupils involved in swimming remains at all times with school staff. Where public pools are used for school swimming, the duty of care still remains with the school staff. Swimming Instructors may be employed to assist with the teaching of the lesson, but it is essential the school staff remain on poolside. Swimming Instructors also have a duty of care, for the pupils directly in their control and for ensuring an appropriate swimming programme for the group.

It is the responsibility of the school staff to monitor the progress of the pupils regardless of who teaches them, equally the teaching programme needs to be agreed to before the course and, if necessary, modified during the course. Having a teacher standing on the side passively watching is a potential waste of talent and energy that could otherwise

benefit the class. Involvement, not lesson observation, therefore not only reduces the instructor pupil ratio, but also enhances the quality of experience for the pupils concerned.

Normal Operating Procedures (NOP) – See Appendix C

For some children, school swimming could be their first experience of being in a swimming pool. It is important that they know and understand the rules of the changing rooms, pool, pool layout and the possible hazards of this new environment.

All school staff must have read and signed to show they understand the Normal Operating Procedure (N.O.P) for the pool being used for school swimming, to ensure that they understand their role and responsibilities during normal operations to maintain safety. This must be recorded by the school, signed by the person delivering the training and kept on file.

Emergency Action Plan (EAP) – See Appendix C

An Emergency Action Plan details roles and responsibilities in the event of a reasonably foreseeable emergency.

All staff must receive an induction course on the EAP to ensure that they understand their role and responsibilities during an emergency. This must be recorded by the school, signed by the person delivering the training and kept on file.

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

All school classes should run practice drills during the first lesson of each term in order that both staff and pupils recognise the alarm signal and know how to respond to it.

Exit doors and signs, fire-fighting equipment and alarm points need to be checked regularly to ensure that they are working and accessible.

All fire doors must be operable without the aid of a key at all times the pool is in use. These should be regularly checked.

Safety equipment such as poles, throwing ropes or throw bags, first aid provision and emergency alarms need to be sufficient in quantity, regularly checked and records kept.

All pools must be equipped with an alarm or alternative backup means of raising an alarm for summoning support in the event of an accident or incident.

Risk Assessment – See Appendix E

For each pool and each session, the children and the staff participating will have unique features that make particular demands upon safety. Each pool and each session must therefore be dealt with individually and risk assessments produced to cover the activity.

The school must provide the swimming instructor with a register, up to date medical information and any other relevant information about the children 7 days before the first lesson and updates of changes during the term. The completed register of children present should be updated and handed to the swimming instructor for them to check before each lesson. School risk assessment template can be seen in appendix E.

Staff **must follow their school** risk management procedures, this should reflect the way that school staff manage off site visits. It is important that it reflects actual practice on visits run by your school/establishment. The only additional written risk assessment any visit leader would need to undertake is for risks that are **above and beyond** those set out in the standard school/establishment risk assessment. This should be reviewed annually or following any accident / incident on an educational visit.

Accompanying school staff are expected to monitor the provision and overview of the risk assessment during the term. Staff should take action to control any identified changes such as:

- School staff to carry a whistle
- 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.
- Known medical conditions/support needs.

If in any doubt about the safety of the lesson, don't proceed. Any concerns should be raised with a duty manager at the centre and reported to the Section Head of ACL, 01492 575565

Council Pools

Where public pools are used regularly for swimming lessons, the Leisure provider should arrange an induction course on the N.O.P. and E.A.P to ensure that all accompanying school staff are clear about how the pool operates and the role they will have to play in an emergency.

Schools whose pupils take part in swimming must be familiar with:

- Risk Assessments for the pool
- The Normal Operating Procedure (NOP)
- The Emergency Action Plan (EAP)
- Conditions of hire/hire agreement

- Pool Rules (usually found in NOP and displayed on poolside)
- Any special requirements or medical conditions of pupils

(N.B. appendices contain model procedures and forms **which must be made specific to each school and pool**).

Medical Information

The Head-teacher should ensure that all relevant and up to date medical and health information is maintained and provided to the swimming instructors.

It is a requirement that all relevant medical conditions are documented on each school's swimming register and Risk Assessment and each swimming instructor and the accompanying school staff must be in possession of all medical information at the start of term, in order that a suitable risk assessment can be undertaken. See Appendix D for templates on which this information can be provided.

If a child experiences a medical condition during a swimming lesson that was previously unknown to the swimming instructor, and/or school, this must be documented in writing by the school designated person. School staff should discuss the incident with the Parent/carer of the child and permission from them to continue with swimming lessons renewed. The incident should be discussed between the school designated person and the swimming instructor so that safe procedures can be put in place by the swimming instructor before the child participates in the next swimming lesson.

Inhalers, for those swimmers who require them, must be accessible at all times including the poolside. It is the school's responsibility to ensure the inhaler is kept safely by the poolside and readily available. Any child coming to the pool without their inhaler will not be allowed to swim.

First Aid Arrangements

All schools should make or check the arrangements for First Aid for travel to, from and at the pool.

Emergency blankets should be available in a box and clearly labelled; this should reflect the maximum number of people who could occupy the pool.

There must be a qualified First Aider, on site at all times when the pool is in use.

- Accidents/Incidents requiring first aid need to be recorded on the Council ADIR form/book.
- Schools hiring the pool must request a copy of the form for their own records.

- Accidents/Incidents should be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where appropriate.

Pool Rules

A copy of a pool rules will be found in the site's N.O.P. Rules will vary from pool to pool, so it is important that school staff read and understand the N.O.P for the site they are using before the first session.

The pool rules should be displayed and explained to all pupils before their first swimming lesson. Pupils should be reminded at the start of each term and ideally coincide with the emergency procedures when being tested (i.e. alarms).

*Only ASA/UKCC Level 2 / STA Level 2 Certificate in Swimming Teaching Teachers are qualified to teach diving. The pools NOP should be checked before allowing jumping in as water may be too shallow. Please see section on Diving.

School Staff Accompanying Pupils to their School Swimming Lesson

School staff must ensure that young people are supervised in accordance with the principle of effective supervision, requiring them to take account of the age and gender of the young people to be supervised, and the ability of the young people (including their behavioural, medical, emotional and educational needs).

This means that arrangement for supervision **MUST** take into account the nature of a group and the individuals in it, ratios should be reviewed with each group to ensure they meet group/ individual needs.

It is not possible to set down definitive staff/student ratios for a particular age group, but these should be regarded as starting points for consideration rather than being definitive

For example, **suggested starting points**

- School years 1 - 3, 1:6
- School years 4 - 6, 1:10/12
- School years 7 onwards, 1:15/20

Please note not ratios for swimming

Ratio is always likely to be lower than the legal minimum that applies

The Association for Physical Education (AfPE 2016) recommends:

'Where specialist Swimming Teachers are employed to lead the lesson, it is essential that school staff remain on poolside to provide an assisting role.'

All adults accompanying pupils to swimming lessons should:

- *Be given a clear role*
- *Understand the limits of the role*
- *Be confident on poolside*
- *Communicate with the other adults on safety issues*

- *Have the necessary discipline and control standards*
- *Regularly carry out head counts during, as well as at the beginning and end of, sessions*
- *Know, understand and be able to apply the pool normal operating procedures (N.O.Ps) and emergency action plan (E.A.P)*
- *Be suitably dressed for the role they are to play in the lesson'*
- *No use of mobile phone's on poolside unless in an emergency.*

(Safe Practice in Physical Education and Sport 2016 Edition)

Accompanying school staff need to work in partnership with qualified swimming instructors.

Teacher Pupil Ratios

As specific circumstances and the building design of swimming pools vary greatly, definitive sets of ratios are not always appropriate. For example, shallow-depth learner pools are much easier to supervise than large public pools.

The starting point for any such policy should be the completion of a thorough risk assessment, based on considerations of staff and pupils, the context and organisation and national governing body guidance.

Teacher pupil ratios will be found in the pool's NOP and will be based on risk assessments.

Irrespective of the teacher pupil ratio, there must always be sufficient school staff present on poolside during the swimming lesson.

All pools will have a designated maximum bather capacity appropriate to the size of the pool. This should be available in the pool's NOP. Class sizes will be calculated from both bather capacity and an appropriate risk assessment.

Occasionally, swimming instructors will request schools to provide a dedicated named person to provide one to one observation for an individual child who has particular health and safety needs whilst swimming. Sometimes this person is referred to as a "spotter". If spotters are in the water they become a participant and should be included in the numbers under the supervision of the swimming instructor. They will be additional to Module 1 trained staff, who are not included in the numbers under the supervision of the Swimming Instructor.

In exceptional circumstances, swimming instructors may ask individual children to sit out of lessons until their health and safety in the water can be managed satisfactorily. A member of school accompanying staff is responsible for the safe supervision of any child asked to sit out of a lesson.

Additional school accompanying staff or Swimming Instructor Assistants (module 1 trained) who may be in the water to aid a pupil do not count towards the teacher pupil ratio, but do count towards bather capacity numbers.

The Amateur Swimming Association recommend maximum Teacher: Pupil ratios (please see below).

Amateur Swimming Association Guidelines

The ratios outlined below are guidelines set by the Amateur Swimming Association for Swimming Teachers holding an ASA/UKCC Level 2 Certificate for Teaching Aquatics Qualification. Please note these ratios below apply to the swimming lesson itself. The ratio for the duty of care of pupils to travel to and from site is different.

These ratios **should only be used for guidance** when writing **risk assessments**, Normal Operating Procedures and Emergency Action Plans and other factors need to be taken into account, **including the competency and experience of the Swimming Instructor, Lifeguard provision (if the Instructor is also taking on the role of the Lifeguard), design of the pool and ability of the pupils.**

The following applies to **UKCC Level 2 ASA (or equivalent) Swimming Teachers**:

PLEASE PAY PARTICULAR ATTENTION TO THE BOLD TYPE SECTIONS WHEN WRITING YOUR RISK ASSESSMENTS AND JOINTLY PLANNING WITH YOUR LEISURE PROVIDERS

<i>Non-swimmers and beginners 12:1</i>
Young children, normally primary school age or adults being introduced to swimming who are unable to swim 10m unaided on their front and back.
<i>Children under the age of 7 12:1</i>
Irrespective of their swimming ability, group size should be restricted.
<i>Improving swimmers 20:1</i>
Swimmers of a similar ability to each other who can swim at least 10m competently and unaided on their back and on their front. It is recommended that the lessons be confined to an area in which the children are not out of their depth.
<i>Mixed ability groups 20:1</i>
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.
<i>Competent swimmers 20:1</i>
Those swimmers who can swim at least 25m competently and unaided on front and back and can tread water for 2 minutes.

Competitive swimmers 30:1
Training only with very competent swimmers.
Swimmers with additional learning needs
Each situation must be considered individually as people with disabilities form a varied group.
Care must be taken to ensure that there are sufficient helpers in the water to provide 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.
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.

As it states, **where schools are taking children who are beginners, unable to swim 10M unaided on their front or back, which is often the reality, the ratio becomes 12:1** and schools will therefore need to employ additional qualified swimming instructors to work safely within these ratios.

Where schools take more than 20 pupils swimming; e.g. a class of 30 pupils, the above applies and they will require:

2 ASA UKCC Level 2 Qualified Swimming Instructors, along with 2 Module 1 school staff.

As stated above, this may need to be increased where there are a large number of non-swimmers; beginner swimmers or pupils with special educational needs.

THE CONWY COUNTY BOROUGH COUNCIL POLICY ON SAFE SWIMMING RATIOS COMPLIES WITH RELEVANT NATIONAL GOVERNING BODIES

ASA Guidance

The absolute upper limit for a qualified ASA UKCC Level 2 (or equivalent) Instructor in School Swimming is 20:1 (owing to the likely mixed ability of the group). It is emphasised that this **will need to be lower depending on the Risk Assessment; e.g. age, ability, special needs and where schools are taking children who are beginners, unable to swim 10m unaided on their front and back (see ASA guidance).**

Council pools work within the above national governing body ratio guidelines. The Conwy County Borough Council Safe Practice in School Swimming Procedures requires school staff with ASA Module 1 qualification to assist qualified swimming instructors (**whilst still working under the above ratios and the guidance of the Level 2 Swimming Instructor**).

The ASA recommend that Module 1 school staff work with **a maximum of 3 pupils**, again dependent on confidence, competence and risk assessments, **under the guidance and**

supervision of the qualified Level 2 Swimming Instructor and within the ASA recommended ratios.

Schools may well need to employ another qualified Swimming Instructor to meet these ratios.

Secondary School Specialist Physical Education teachers who are ASA Module 2 qualified, will have experience of working practically with groups; many will have had some swimming training during their courses and thus (dependent on Risk Assessment – confidence and competency) are able to deliver school swimming, within nationally recognised safe ratios. In addition, the minimum requirements for lifeguards will need to be met.

AfPE Guidance 2016

Some key points arising from AfPE:

Firstly, there should never be only one pair of ‘qualified eyes’ (a qualified ASA Level 2 or equivalent swimming instructor or lifeguard) on poolside. Whilst teachers have organisational and teaching experience, along with knowledge of their pupils, most will have ‘unqualified eyes’ in terms of spotting pupils in difficulty in the water. The swimming pool is a totally different environment from school settings. Therefore, if the swimming instructor is also the lifeguard, there should be an additional qualified swimming instructor on poolside.

Other Important Factors

Schools using Council pools must work in partnership to assist the qualified pool staff, within the ratios outlined by the ASA (outlined above).

It is vital that schools work with their Leisure Providers and hold discussions (preferably induction visits) at the start of the term. A Risk Assessment must be undertaken.

Appropriate Ratios for Other Qualifications for Teaching Swimming

The Risk Assessment is paramount and should determine safe ratios.

The following upper limit applies to all school swimming lessons.

Qualified to:

ASA UKCC Level 2: Upper limit for pupils 20:1

ASA UKCC Level 1: With an Upper limit of 5 is a support teacher to Level 2 qualified teacher (within the 20:1 upper limit).

Module 1 (Unit 1 & 2): 3:1 pupils, working under guidance of a Level 2 qualified teacher who is working under the ASA recommended ratios.
(Within the 20:1 upper limit).

Module 2: 8:1 pupils, working under guidance of a Level 2 qualified teacher who is working under the ASA recommended ratios (within the 1:20 upper limit).

Secondary school qualified PE teacher with Module 2: working within ASA Ratio Guidelines, absolute upper limit 1:20

Primary School qualified teacher with specialism in PE : Following a risk assessment it may be appropriate for Primary school teachers with a specialism in PE to teach children to swim in shallow tank pools less than 1.2m depth. Should this be considered appropriate they must:

- Never teach alone.
- The group should be no more than 20 children or the maximum number of bathers for the pool.
- Ensure an appropriate lifeguard is present.
- Hold ASA Module 1 or equivalent

Diving – Shallow Entry Racing Dives

Diving must only be taught by an appropriately qualified swimming instructor with a diving specific qualification. At no point must anyone without this qualification be allowed to teach diving. Please note recently acquired ASA/UKCC level 2/STA Level 2 qualifications no longer include an appropriate qualification to teach diving.

NB. All teachers/instructors (schools and leisure providers) must check whether their qualification covers them to deliver diving. Please also refer to AfPE Safe Practice in Physical Education and Sport 2016 Edition, Section 5.2.46 for guidance on diving.

No diving shall be permitted in water less than 1.8m deep and/or with less than 7.6m forward clearance. However, the clearance will vary according to the height and the ability of the person undergoing instruction and therefore instructors should consider the clearance required taking this into account. Only shallow entry dives should be permitted.

Diving blocks and stages must conform to FINA/ASA regulations.

Qualifications for Lifeguard Provision

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.

There must always be at least 2 people on poolside whilst there are swimmers in the water. One of these supervisors must always have the responsibility for lifeguarding, rescue and resuscitation. They need to have a suitable lifeguarding qualification in accordance with the pool size, depth, NOP and Risk Assessment.

If fully qualified (to ASA UKCC Level 2), in a school pool over 1.2m where the NOP allows, a swimming instructor can also be responsible for lifeguarding if they hold an appropriate

lifeguarding qualification, when assisted by an additional qualified person (at least Module 1).

A Swimming Instructor who is also responsible for life guarding should not work alone.

Lifeguards must never leave the poolside unattended and always secure the poolside against unauthorised access. They must remain alert and be facing the pool at all times.

See Appendix M for appropriate Lifeguarding qualifications for pool types.

UNPROGRAMMED SCHOOL SESSIONS IN ALL POOLS, OWING TO THEIR UNPREDICTABLE NATURE, SHOULD ONLY TAKE PLACE FOLLOWING A THOROUGH RISK ASSESSMENT.

(These are defined as any activities including any non-structured swimming session or 'free play'.)

A Health and Safety talk should be run with every class (pupils and teachers) at every pool on the first lesson of each term (and then regularly or when required) to ensure familiarity with the pool alarm and emergency procedures.

Swimming Instructor Position

The Swimming Instructor in charge of the group should 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 pupil in the group.

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, (as an additional person). This would be the exception rather than the rule and only following a careful risk assessment, by the swimming instructor, of all the potential factors involved (depth of water, pupil ability, and use of flotation aids, size of pool, number and age of pupils, life guarding arrangements).

The teacher or member of staff 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.

When teaching or instructing non - swimmers or weak swimmers in underwater swimming or activity, the Swimming Instructor 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. When an additional person is in the water assisting, they must be aware of the NOP and appendix J Re: handling in the water. This will not compromise ratios on poolside.

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 re-position themselves so that anything on the bottom of the pool can be seen.
- **In an outdoor pool** the teacher/lifeguard should position themselves so that anything on the bottom of the pool can be seen.

Accompanying school staff, who are not involved in teaching swimming, should be positioned as 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. Such staff will be in addition to the ASA Module 1 qualified members of accompanying school staff, working on poolside with the children under the direct supervision of the Swimming Instructor. Care needs to be taken that there are not excessive numbers of adults on the poolside, but that all staff accompanying the children swimming are alert and supportive to the Swimming Instructor.

Swimmers with additional learning needs

The Equality 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 into place to ensure children with disabilities are able to learn to swim. However, there remains the principle that justifiable actions for the protection of an individual's life or health and safety override the duty to include.

Schools may have to consider the following:

- Pool accessibility (i.e. ramps, hoists and changing facilities)
- Increased Teacher : Pupil ratio
- Assistant/helper in the water

Please refer to the ASA Guidance for Teaching in the Water – Safeguarding, within Appendix J, for guidance for assistants/helpers in the water.

The Institute of Swimming offer on line learning (An Introduction to Disability Swimming – www.theiosonline.com/alltraining/onlinelearning) to support the teaching of swimming activities to children who have severe learning difficulties.

Guidance on Goggles

Association for Physical Education

While swimming goggles may make a child feel comfortable in the pool while they are learning to swim, if they accidentally end up in water it is unlikely they will be wearing them. It is vital that children are comfortable swimming with or without goggles. Goggles are not normally recommended for normal swimming lessons or where swimmers have poor control in the water. Adults' attention can be distracted by constantly having to help children adjust goggles etc. and limbs that are not controlled can often knock faces and goggles in crowded swimming conditions. Equally the pupil's attention can be compromised by the need to adjust and replace goggles.

The Swimming Instructor for the group is responsible for determining whether any pupil wearing goggles is using them safely and for a positive purpose. If they are not then the goggles should be removed.

Pupils with medical eye conditions may also need to be allowed to wear goggles. There may be particular situations, such as in hydrotherapy pools where the higher temperature

may affect chemical balance and may cause eye irritation but this should be managed through water treatment strategies rather than recourse to goggles.

Any deviation from the guidelines should be noted in the risk assessment for the activity. Knowledge about individual children's needs remains critical in determining the wearing of goggles.

Risk management should include ensuring parents have taught their children to put on and take off goggles safely.

Basically take an informed sensible approach, acknowledge that you are aware of the guidelines, and ensure that your children enjoy the experience.

Parents are responsible for requesting permission that goggles be worn by their children and schools are responsible for collecting and recording such requests. The Swimming Instructor will ultimately decide whether the wearing of goggles is appropriate for the activity being undertaken.

Children may be asked to remove their goggles for certain activities e.g. self-rescue, water polo.

Child Protection / Safeguarding

Special attention must be given to protection of children from abuse. Because of the opportunity for close physical contact and the nature of swim wear rules and procedures to avoid abuse and the allegation of abuse. **Schools must ensure that all pupils are safe; attention should be placed on ensuring that Harmful Sexual Behaviour cannot occur. Schools are advised to seek guidance through the NSPCC's Harmful Sexual Behaviour Framework, and the school's procedures should conform with its recommendations.**

<https://www.nspcc.org.uk/globalassets/documents/publications/harmful-sexual-behaviour-framework.pdf>

For this reason:

| All persons working with children must have a DBS Disclosure.

When supervising, changing or assisting children with their swimming, pool and school staff and adults other than teachers, should avoid physical contact with children unless it is:

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

- To assist with a personal care task which the child or young person cannot undertake by themselves.

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.

Appendix J contains the ASA Guidance for Teaching in the Water. The protocols the ASA suggest include:

- Ensure there is a system included within the Pool Operating Procedures whereby the parent or guardian of the pupil gives permission for the teacher to handle the children, for the purposes of supporting them in the water or manipulating limbs to convey correct stroke techniques (this could be through the parental swimming permission form).
- Ensure that any handling of pupils is done within clear sight of other persons.
- Always explain to the pupil that you are now going to hold him/her and why, to avoid embarrassment.
- Swimming instructors must never support pupils in such a way that their hands cannot be seen by the spectators.
- Never support a pupil by handling the swimmer's torso.
- Only support swimmers by holding their hands, head or feet.

Additionally teachers and instructors should NEVER teach or coach a swimmer alone.

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 should also be recorded by pool staff on ADIR forms.

In the event of a child needing to be taken to hospital for treatment, a representative from the school, known to the child, 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/carers of the child should be informed as soon as possible.

Staff and adults other than teachers, 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.

Supervision of Changing Rooms

Parents/guardians should be informed of changing arrangements.

It is the responsibility of the accompanying school staff to provide appropriate supervision whilst the children are changing.

Only staff of the appropriate gender should enter the changing room, where possible, unless in an emergency.

A mixed gender group may use an open plan, single sex changing area if the children are under the age of seven and with agreement from pool management.

Transgender

The use of changing rooms by Transgender children and young people should be assessed on a case by case basis in discussion with the individual. The goal should be to maximise social integration and promote an equal opportunity to participate in school swimming lessons, ensuring safety and comfort, and minimising stigmatisation of the child or young people. In most cases, transgender children or young people should have access to the changing room that corresponds to their gender identity. This approach is underpinned by the Equality Act 2010 whereby refusing a child or young person access to the changing room of their gender identity would constitute an act of discrimination.

See appendix F for the Swim England Guide to Engaging Trans People in swimming.

Conditions of Hire (Schools using external providers) – AE to use as a separate guidance for school whilst on Educational Visit – i.e. visits abroad etc.

Pool Operators cannot delegate responsibility or accountability for what happens in their pools and therefore need to ensure that the school use the pool in a safe manner, including safeguarding of young people and vulnerable adults.

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. If the pool is to be hired for an un-programmed session (See definition Page 20) the pools' NOP should refer to these. It is recommended that a qualified NPLQ lifeguard must be present regardless of pool depth, due to the unpredictable nature of such sessions.

Conditions of hire should include:

- The name and address of the school 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, the*

form should be ideally 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, number of swimming instructors and their qualifications; who will provide the lifeguarding; qualifications of lifeguards and the level of life guarding provision to be made, qualifications of First Aiders, 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*); responsibility for emergency equipment at poolside, e.g. poolside First Aid, rescue equipment; responsibility for structural or power failures etc. will remain with the pool operator, who will therefore need to have competent staff in attendance during the hire session.
- 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 read and understood the copies of the NOP & EAP.
- Ratios for un-programmed sessions should be different to structured swimming lessons. In addition young children require close supervision in the water by an adult.
- 4 years and under in a ratio of 1:1.
- 8 years and under in a ratio no more than 1:2.

Safety Equipment

Safety equipment such as poles, throwing ropes or throw bags and first aid provision must be readily available and sufficient in quantity, regularly checked and positioned to be readily available when needed, without creating additional hazards to pool users.

Reaching poles should be kept at both ends of the pool and should be long enough to reach over half of the width of the pool, location being clearly indicated. (Very large poles can be difficult to manage – there may not be enough room to use them effectively, ensure poles can be managed safely).

All school pools must be equipped with an effective measure of summoning support in the event of an accident or incident including a backup method.

- Pool depths should be marked clearly around the pool and all signs should be compliant with the Health & Safety (Safety Signs and Signals) Regulations 1986. In pools with a sudden change in depth, there should be a pool profile on display.

- A pool divider (usually a rope) should be positioned to separate deep and shallow water when non-swimmers are present.

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

Teaching Lifesaving

*‘When teaching lifesaving, only reaching with a pole or similar item and throwing rescues should be taught to children below 8 years of age. **Contact rescues** should not be taught to children under 13 years of age.’*

‘Advice on teaching packs and awards for lifesaving at the appropriate key stages in primary and secondary education is available from the RLSS, STA, and ASA.’

(Safe Practice in Physical Education and Sport 2016 Edition)

Pool closures

If, following the issue of any Pool Service Report, the leisure centre is advised to close the pool based on unsatisfactory water chemistry, the report must be signed on behalf of the Council by a senior manager acknowledging the need for closure.

The bacteriological samples have to be sent away for analysis; the Council will be informed immediately of unsatisfactory results by telephone/facsimile/email and of satisfactory results by post.

Following closure for any reason, it will be the Council’s responsibility to arrange for remedial measures to be taken, for further testing and analysis of the pool water by a competent contractor - to obtain satisfactory results before the pool can be put back into use. The Health & Safety Team must be informed of the results.

Natural Water Bathing (Bring with conditions of hire external) put this in Appendix keep the paragraph below.

For the purpose of this guidance, “Natural Water Bathing” is defined as “swimming or paddling, in river, canal, sea or lake”. This document should be read alongside the following document;

“Group Safety at Water Margins” (DfES/CCPR 2005).

Taking young people on a trip to the seaside in good weather, and then not allowing them to at least paddle or cool off in the water would seem unfair and inappropriately risk-averse. There is a range of activity from paddling (water below knee level) in a shallow splash pool, or sitting chatting in shallow water at the edge of a lake or sea, where the purpose of the activity is to cool off, to swimming well out of one’s depth or body surfing in the waves.

Involving young people in well organised and supervised swimming or paddling in natural waters can provide a great opportunity to develop their awareness of water safety, choice of swimming area and safe conduct while swimming. Such opportunities are important because swimming and paddling in natural waters present real risks: around 400 people drown every year. The most effective way to reduce the risk of young people drowning is to

teach them to swim, giving them the skills to make sound judgements about playing in and around natural waters.

Open inland water such as rivers, lakes, reservoirs or canals present additional risks to those of a swimming pool. These include vegetation and other under water obstructions, sudden changes in depth and pollution, slippery rocks and surfaces. Swimming in the sea carries additional risks which may include low water temperature, strong winds, undertow and tide

Clearly the risks to be managed will differ for paddling in clear calm shallow water compared to those for swimming in deep water. But it is important to recognise that the risks involved in any use of natural water should be carefully assessed.

Natural water bathing should always be a robustly planned activity with a fresh look at any risk assessment or operating procedure each time it is undertaken. It should never be allowed as an impromptu group activity. The pleas of young people to be allowed to bathe within the context of another activity (e.g. because it is hot weather) must never be allowed to influence the leader's judgement of the situation.

Visit Leaders must seek out recognised bathing areas that have qualified lifeguard cover. Even then, they should be aware that young people might mingle with members of the public and be lost to view. In natural water bathing, young people should always be in sight and within reasonable reach of those supervising them. It is essential that supervisors always know how many young people are in the water and where they are. A number of young people on educational visits have drowned in shallow water because leaders did not keep track of where they were.

The Visit Leader should assess the risks, taking into account the group, the staff available and the venue, and decide on an appropriate safe supervision level and plan for their particular group before the activity takes place. This plan should be communicated to all other supervisors and participants.

At least one person within the supervision team should be appropriately competent in life saving and resuscitation. Appropriate competence means being able to deal with the worst-case scenario in your chosen environment. For example, when paddling or cooling off in contained shallow waters, or at a beach when the sea is calm and there is no risk of anyone getting out of their depth or encountering currents or underwater hazards, this may simply involve a suitable first aid qualification. When close to or entering a fast flowing stream or river, a supervisor may require experience and skills in white water safety and rescue. When it is possible for someone to get out of their depth, then 'in-water' lifesaving skills may be required. In the last two cases, competence should be verified by a relevant qualification, or by evidence of sufficient training and experience assessed by a competent technical adviser.

For paddling in the sea (gentle, shallow water with no intention to swim) a thorough risk assessment MUST be undertaken which includes:

- A minimum of 2 staff and a ratio of 8:1 participants to staff.
- The ability to account for all participants at all times.

- A person qualified in at least Emergency Aid and competent to carry out CPR. This person may be included in the staffing ratio or be present as an additional person to carry out this responsibility.
- Thorough knowledge of conditions on the beach.
- An agreed and restricted swimming/paddling area taking into account: age, weather and water conditions and safety provision.
- Emergency signals - visual and audible – and need for a whistle and First Aid equipment.

Managing the activity

Leaders should:

- Ascertain for themselves the level of the participants' swimming ability.
- Ensure the activity is suitable for the group, especially any with special needs or disabilities.
- At the beach look out for warning signs and flags: a red flag means it is unsafe to swim; yellow flags mean that lifeguards are on patrol in the area between the flags; a black and white flag means it is an area used by surfers and not suitable for swimming.
- Brief the group about the limits of the bathing area.
- Consider marking the bathing area themselves, for example with a rope or buoys.
- Adopt and explain signals of distress and recall.
- Carry out regular and frequent head counts.
- Have clear roles within the supervision plan – at least one supervisor should always stay out of the water for better surveillance, even where lifeguards are on duty.
- Take up a best position from which to exercise a constant vigilance.
- Divide supervision between staff who are in the water and looking landward towards the group, and staff who stay on land and watch the group from that vantage point.
- Give the participants their full, undivided attention.
- Be prepared to act immediately when a participant appears to be in difficulties.
- Be aware that a participant in difficulty may not wave or shout – all of their energies could be focussed on trying to keep afloat.
- Follow the advice or directions of an official lifeguard.

- Avoid swimming themselves - unless it is to help a person in distress.
- Avoid joining in with the group's water-based games.
- Ensure that participants leave the water if they are at risk of becoming too cold; especially if toes and fingers look blue or feel numb (this could suggest the onset of hypothermia).

Everyone should know:

- That many people who drown are strong swimmers.
- That sudden immersion in cold water can be very dangerous.

Other Activities

Jumping and diving, as from sea cliffs or gorge environments, should be treated as a specialist adventure activity and be managed accordingly. The Activity Leader should be assessed as qualified specifically competent to lead these activities.

Use of throw-lines

Throw-lines in the hands of a trained and competent leader can have a significant impact on reducing the risk of drowning. However, they can create a false sense of security in the hands of someone who is not well-practised in their use, and training with this rescue tool is required.

Open inland water such as rivers, lakes, reservoirs or canals present additional risks to those of a swimming pool. These include vegetation and other underwater obstructions, including discarded fishing lines, angling equipment, sudden changes in depth, currents and pollution. Swimming in the sea carries additional risks which may include low water temperature, strong winds, undertow and tide.

Particular consideration should be given to the following factors:

- Unknown locations and hazards, especially overseas
- Changing environmental conditions
- The level of supervision
- Adherence to local advice
- Preparation and knowledge of young people, e.g. is it a planned activity?
- Choosing a venue

The designated Lifeguard must be dedicated exclusively to the group, and the location used must fall within the RNLI/RLSS definition of a 'safe bathing area'. **Local advice must always be sought.**

Records

It is important that adequate records are kept of all tests carried out. Records must be kept for a minimum of 5 years.

Routine Maintenance

Daily running of the pool and related plant will be the responsibility of the Leisure Centre.

Pool carer(s) should ensure that all safety fittings, such as pool steps, handrails, etc. and other equipment is secure and in good repair.

Pool surrounds should be slip resistant, flat and without any trip hazards to prevent injury to bather's feet. Where there are cracked paving slabs these should be replaced immediately.

Broken or missing grids to water outlets at the bottom of pools must be replaced immediately.

Records – Swimming

Qualifications

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 person responsible for this is the School Teacher in Charge of School Swimming. These records will be kept in the school swimming folder and will be looked at as part of the Health and Safety Team annual school check.

Incidents and Accidents

Records of incidents and accidents that occur in the swimming pool or pool area must be maintained and be available for inspection if required. An annual review of these records will assist with the review of the risks associated with school swimming.

References

- ❖ Whitlam, P (AfPE's Health and Safety Project Manager), *Safe Practice in Physical Education and Sport*. 8th ed. 2016: Association for Physical Education (); ISBN: 978-1-905540-94-4 (Appendices on accompanying CD); Aquatic Activities – 5.2
- ❖ HSG 179 '**Managing Health and Safety in Swimming Pools**' 3rd Edition, 2018, which they can purchase from the Health and Safety Executive (HSE), or also available to download free from: www.hse.gov.uk
- ❖ **Amateur Swimming Association (ASA)** *Safe Supervision for Teaching and Coaching Swimming*. www.swimming.org/asa
- ❖ **Swimming Teachers' Association (STA)** www.sta.co.uk

- ❖ **The Institute of Swimming (IOS)** – on line training www.theiosonline.com
- ❖ **Royal Life Saving Society (RLSS) UK** www.lifesavers.org.uk or <http://rlssoonline.com>
- ❖ **Other Useful Websites:**
- ❖ **Chartered Institute for The Management of Sport and Physical Activity (CIMSPA)** www.cimspa.co.uk
- ❖ **National Guidance on Educational Visit (Outdoor Education Advisors Panel) OEAP-** www.oeapng.info