



Swimming Policy

Safe Practice in Swimming Guidelines

Based on WCC 2009 Document

Adopted by Governing Body: 08.12.15

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Review Cycle: 1 year

Statutory Policy: No

N.B The NOP, the EAP and the Risk Assessment should be reviewed at the same time.

SAFE PRACTICE IN SWIMMING

This **amended** Worcestershire County Council document represents the Authority's policy and guidance on swimming for schools and other Children's Services establishments. Whilst it will require local interpretation and adaptation to individual circumstances, care must be taken to ensure that these remain consistent with the overall policy and guidance set out in this document.

UN Convention on the Rights of the Child (Article Numbers: 15, 16, 17, 19, 23, 24, 29, 31)

1. INTRODUCTION

1.1 Swimming is an important life skill. It is also a highly beneficial activity for acquiring an increased movement vocabulary. In addition, it provides skills for health and enjoyment, and gives 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 proficiently and as early as possible.

1.2 Nonetheless, it is a recreational and teaching activity 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.

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

1.4 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 Normal Operating Procedure (NOP)
- the Emergency Action Plan (EAP)
- conditions of hire
- pool rules
- any special needs or medical conditions of pupils.

1.5 This document sets out the policies and procedures of Worcestershire County Council in relation to swimming pool safety. The Appendices contain model procedures and forms for those schools which have their own pools. These must be made specific to each pool.

1.6 References

Schools with their own pools should have a copy of:

HSG 179 "Managing Health and Safety in Swimming Pools" – 3rd Edition 2003,
HSE Books for £10.95 + P and P; telephone 01787 881165. ISBN 1 978 0 7176 2686 1

"Swimming Pool Water – Treatment and Quality Standards" – 1999

Pool Water Treatment Advisory Group – £35.00 – ISBN 0 951 7007 66

Published by: Greenhouse Publishing Ltd, telephone 01379 890721

(N.B. A revision of this book is expected to be published during 2008.)

All schools should have a copy of:

"Safe Practice in Physical Education and School Sport" – 7th Edition, 2008

Association for Physical Education (AfPE) – £44.99 - ISBN 1 978-1-905540-54-9

Coachwise Ltd. 0113 201 5555 – www.1st4sport.com

The QCA website www.nc.uk.net/safeswimming may also be of help.

Refer also to the DCSF and DCMS "Swimming Charter" – support for swimming as a strand of National PE, School Sport and Club Links Strategy (PESSCL).

2. RESPONSIBILITIES

2.1 Overall County Council Responsibility

Worcestershire County Council has responsibility for ensuring safety in swimming in schools, units and centres where it is the employer. As part of this responsibility the County Council provides the safety policy, guidance and procedures for swimming, and ensures that its employees receive any necessary training to carry out their delegated tasks. In Academy, Foundation and Voluntary Aided schools the Governing Body holds this responsibility, but the Local Authority will act as their agent where their health and safety services have been purchased as part of a service level agreement.

2.2 School, Unit or Centre Responsibility

Every Headteacher or manager should ensure that a nominated member of staff is delegated the responsibility of swimming co-ordinator to apply the swimming safety policy and procedures for their establishment. At Pitcheroak School this person is **Michael Wright**. This will include the proper operation of the establishment's own swimming facility or use of a hired pool. It also includes monitoring and recording of:

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

2.3 Teaching Staff

Teachers have a duty of care that operates for any activity in which children are involved; they cannot transfer that duty of care to anyone else. The law has described this 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 operating and emergency procedures are enforced
- teachers have an overview of the teaching of 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.

In small shallow school learner pools (1.0 metre deep or less) it may not be practical to have a swimming instructor. In these circumstances the class teacher may need to take on the responsibilities of the swimming instructor (see 2.4).

2.4 Adults Other than Teachers (AOTTs)

2.4.1 Swimming instructors

Swimming instructors will hold a relevant national teaching qualification (see section 6) and may be employed by a school to teach in their own pool or in a public pool. They have responsibility for ensuring the safe conduct of the class in the water and on the poolside, in line with good practice and their training, which includes:

- being familiar with the Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) for the pool and 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

and in co-operation with the visiting school's swimming co-ordinators:

- planning, developing and monitoring the swimming programme
- preparing schemes of work appropriate to pupils' ages, abilities and interests
- identifying specific groups for each swimming session
- helping the class teacher to check pupil numbers before, during and after sessions.

They must be vetted by DBS to work with children.

A member of school staff must always be in charge and present when children are being taught swimming. This responsible member of staff will maintain their duty of care for the children and any other staff or volunteers assisting.

2.4.2 Other adults (TAs, volunteers etc.)

Other adults can be extremely helpful and may be absolutely essential, to support the delivery of swimming in the PE curriculum and in the extended curriculum, whether on or off site. Teachers cannot transfer their duty of care to these other adults, but where they have experience in the teaching of swimming they may be involved in it. They can:

- supervise changing
- administer first aid
- look after any children who are not swimming or who are unwell.

Additionally, those who have the necessary experience, expertise or qualifications to teach swimming may replace a teacher who does not. However the Headteacher must be aware that they hold the responsibility for ensuring that they are competent. The pool environment is more isolated than a classroom where they can more easily call upon qualified teacher support if required. Because the teaching of swimming and supervision of changing involves significant contact with children, all adults should be DBS checked.

2.5 Lifeguards

Pool operators have a responsibility for the safety of all who use their pools. Whenever children swim, there must be someone present with appropriate life guarding, rescue and first aid skills (see Section 5).

in a school pool (depth more than 1.0m)	this must be a teacher, a swimming instructor or an AOTT
in a public pool	this must be a qualified pool lifeguard or an AOTT with the same qualification
in a private pool	this must be a qualified lifeguard, a teacher, a swimming teacher or an AOTT
hydrotherapy pool	this must be specialist staff (e.g. a physiotherapist), a teacher, a swimming teacher or an AOTT
in a learner pool (depth less than 1.0m)	this must be a teacher, swimming instructor or an AOTT with a minimum of First Aid at Work qualification.

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

- be familiar with the pool NOP and 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

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

N.B. A teacher of swimming who is also responsible for life guarding must never 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.

3. STAFF TO PUPIL RATIOS

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

3.2 There must always be at least one adult, in addition to a lifeguard, present on the poolside. Staff should carry out and record a thorough risk assessment to help determine pupil: staff ratios. The following ratios are based upon safety considerations rather than teaching requirements:

Recommendations

Adult and baby groups: 12 pairs:1

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

Non-swimmers and beginners: 12:1

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

Improving swimmers: 20:1

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

Mixed ability groups: 20:1

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

Competent swimmers: 20:1

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

Competitive swimmers: 30:1

Training only with very competent swimmers.

Specialist swimming activities: various

For more information about the appropriate ratios for specialist activities refer to the ASA at Harold Fern House, Derby Square, Loughborough 01509 618700 or refer to the ISRM publication "Safe Supervision".

Swimmers with disabilities: 1:1 – 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.

4. SUPERVISION OF CHANGING ROOMS

4.1 Children should be supervised whilst changing.

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

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

4.3 In Public Pools

It is not desirable for members of the public to share changing provision with school pupils. Pool operators should be asked, wherever possible, to make arrangements for schools to have sole use of changing rooms. Where this cannot be achieved appropriate supervision arrangements need to be agreed between the pool and school. Schools should consider cancelling contracts and seek alternative facilities if the pool management is not amenable to such arrangements.

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

4.4 In School Pools

Children will be able to change without members of the public being present. Arrangements for the supervision of children should be as in paragraph 4.1 and 4.2 above.

5. LIFEGUARD PROVISION AND QUALIFICATIONS

Someone must always have specific responsibility for lifeguarding/rescue and resuscitation and must be suitably trained and qualified in accordance with the circumstances applying.

5.1 In a Public or School Pool with Deep Water (greater than 1.0 metre deep)

5.1.1 Programmed session

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

Minimum Qualification for Lifeguards: Royal Life Saving Society (RLSS)

National Rescue Award for Swimming Teachers and Coaches

5.1.2 Un-programmed session

In un-programmed sessions (recreational swimming – such as an end-of-term fun session or PTA use in evenings or at weekends) the unpredictable nature of children’s behaviour will be such that a higher lifeguarding standard will be required, as per normal public swimming supervision.

Minimum Qualification: RLSS 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 predetermined zoned areas in line with the NOP for the pool. School staff and AOTTs should work under the direction of the qualified pool lifeguard staff.

5.1.3 Mixed programmed and un-programmed sessions

Where the pool is in shared use and clearly divided between programmed and unprogrammed swimming activities, suitably qualified staff 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 and Coaches

Where shared used is not in defined areas then the standard of lifeguarding provision should be as for an un-programmed session.

Minimum Qualification: RLSS National Pool Lifeguard Qualification

5.2 In Shallow Water Learner Pools (less than 1.0 metre deep)

5.2.1 Programmed session

In programmed sessions (such as teaching, coaching and other tuition) the degree of control inherently in place is likely to reduce the risks and this safety cover may be provided by a swimming instructor or member of staff provided they have appropriate qualifications to teach, apply first aid, effect a rescue and have appropriate support for the number of pupils being taught. Staff should not work on their own in the pool.

Minimum Qualification: First Aid at Work

5.2.2 Un-programmed session

In un-programmed sessions (recreational swimming – such as an end-of-term fun session) the unpredictable nature of children’s behaviour will be such that a higher life guarding standard will be required, on a par with normal public swimming pool supervision.

Minimum Qualification: RLSS National Pool Lifeguard Qualification

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 predetermined zoned areas in line with the NOP for the pool. School staff should work under the direction of the qualified pool lifeguard.

5.2.3 Mixed programmed and un-programmed sessions

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

Minimum Qualification: First Aid at Work

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

Minimum Qualification: RLSS National Pool Lifeguard Qualification

5.3 Further Information on Lifeguarding Qualifications and Courses

RLSS National Pool Lifeguard Qualification

This is a course taken in two units. Unit 1 lasts a minimum of 31 hours and covers the principles of pool lifeguarding, water rescue skills, conscious and unconscious casualties, CPR skills and First Aid. Unit 2 is a practical assessment over a minimum of seven hours in a work-related environment. The course is offered at more than 2000 centres nationwide.

RLSS National Rescue Award for Swimming Teachers and Coaches is a two day course

This course covers class management, basic first aid and resuscitation as well as aquatic rescues likely to occur during programmed activity. The course is offered at seven centres. Details of both RLSS courses are available at www.lifesavers.org.uk.

First Aid at Work is the basic first aid course for fully-qualified first aiders in schools and other workplaces. It is normally taken as a four day course, with an assessment by examination on the final day. The course covers most aspects of first aid, including CPR and courses for schools organised by Worcestershire County Council also include an element of paediatric first aid to meet the requirements of early years work. First Aid at Work courses are available for Worcestershire County Council teaching staff from the INSET Office (telephone: 01905 740122/3/4/5) and for support staff from Children's Services Health and Safety (telephone 01905 766189).

6. QUALIFICATIONS FOR THE TEACHING OF SWIMMING

It is a strong recommendation that the class teacher accompanies the class to the pool for all swimming lessons in first and primary schools. If this cannot be adhered to, a qualified swimming instructor member of staff must be present.

It is essential that provision is made for lifesaving, first aid and resuscitation cover in all school swimming sessions. If the pool provides a lifeguard, that lifeguard should hold a valid National Pool Lifeguard Qualification (NPLQ). This covers lifesaving, lifeguarding and first aid (including resuscitation) skills. If no lifeguard is provided alternative and satisfactory arrangements, in line with this policy document, must be made. This is likely to be the case at most school pools. (See paragraphs 5.2 and 5.3.)

Ideally the best qualified swimming teacher/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.

6.1 Swimming Instructors

- Specialist instructors of swimming will hold an Amateur Swimming Association (ASA) Primary School Teacher Certificate for the Teaching of Swimming/Assistant teaching, an STA Certificate in Teaching Swimming (Primary Teacher (STC[PT]) or Secondary Teacher (STC[ST]) as appropriate) or national equivalent as a minimum qualification.
- Where teaching specialist groups, additional qualifications may be required, for example, ASA Certificate for Teaching Swimming for People with Disabilities – Level 1 or 2 as appropriate to the group.
- If supervising an un-programmed session the teacher or instructor must hold a current RLSS National Pool Lifeguard Qualification (NPLQ).
- Swimming instructors should keep their qualifications updated.

6.2 School Staff

Any adult teaching swimming lessons must be competent to do so by virtue of experience or qualification. Where possible, staff will have completed the following qualification: **SEQ Level 1 Swimming Assistant (Teaching) Qualification**, as a pre-requisite for the **SEQ Level 2 Teaching Swimming Qualification**. Nobody should ever 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.

6.3 Other Adults Assisting (Not Leading) the Teaching of Swimming

6.3.1 In school pools

Where an adult other than a teacher or swimming instructor assists with swimming they should be given a clear understanding of what is expected of them. The SEQ Level 1 Swimming Assistant (Teaching Qualification) is a practical qualification to start a career in swimming which will provide school staff with the skills needed to become an assistant swimming teacher.

6.3.2 In public pools

Where an instructor of swimming has been provided, the role of the class teacher and other accompanying school staff will be to work collaboratively with that person, though the class teacher retains the ultimate responsibility for the safety of their pupils.

6.4 Induction for School Staff and AOTTs

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

6.5. Records of 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. Records must be retained for a minimum of three years. The person responsible for this is the designated person in charge of school swimming.

6.6 Further Information on Swimming Teaching Qualifications and Courses

Swim England Qualifications (SEQ) and courses are available at an introductory level for teachers wishing to gain further experience or awards.

- SEQ Level 1 Swimming Assistant (Teaching);
- SEQ Level 2 Teaching Swimming;
- SEQ Level 3 Aquatic Activity for Health;
- SEQ Level 3 Swim Coordinator;
- SEQ Level 3 Education and Training qualification.

7. RISK ASSESSMENT

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

7.1 Risk Assessment for Pool Users

Staff, usually class teachers, must undertake a written risk assessment, for the visit to the pool (including the journey to and from it) and the activities planned, as part of their lesson planning process. This will be monitored by the school's swimming co-ordinator. It should be kept with the scheme of work and should include details of hazards, risk potential and control measures including supervision arrangements (on the journey, during changing and in the pool), lifeguarding, ratios for specific classes, groups or lessons and should take account of:

- 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.

The risk assessment should be written before the swimming unit of work commences, though it may need to be revised in the light of experience. Any risks specific to individual children with special needs of any sort will be covered in class risk assessments. A variety of skills are required, stemming from an assessment of each child's individual requirements. An on-going, unwritten risk assessment should be undertaken by individual members of staff, each time they attend the pool, to take account of the situation at that time and to take action to control any identified risks.

Pitcheroak School's Swimming Risk Assessment is attached at the end of this document

7.2 Pool Risk Assessment for School Pool Providers

Where a pool is on a school site, the host school has a responsibility to undertake risk assessments: to identify the hazards that might be present at the pool to assess the potential for risk to identify measures to eliminate and control risks and take steps to implement them. Additionally, the host school is responsible to ensure that hirers, including other schools and other users, are aware of the risks identified and the steps required to control them. The control measures for risks (but not the risk assessment itself) will be included within:

- a Normal (safe) Operating Procedure (NOP)
- an Emergency Action Plan (EAP).

Copies of the NOP and EAP must be provided to all hirers. The host school must ensure that all visiting staff are clear about how the pool operates and the role they will have to play in any emergency. The visiting school's swimming co-ordinator must:

- make a preliminary visit to become familiar with the pool and see how the NOP and EAP apply in context
- make the NOP and EAP available to all staff and AOTTs who are involved in school swimming sessions at the pool. (These should be re-issued to all hirers when they are reviewed but the school should check, annually, with the pool management that they have not changed.)
- 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 if the visiting school's swimming co-ordinator changes, they must make a preliminary visit to become familiar with the pool and see how the NOP and EAP apply.

7.3 Pool Risk Assessment for Public Pool Providers

Where public pools are used regularly for swimming lessons the Pool Manager should provide the NOP and EAP to the school's swimming co-ordinator, who must ensure that all visiting staff are clear about how the pool operates and the role they will have to play in any emergency. The school's swimming co-ordinator must:

- make a preliminary visit to become familiar with the pool and see how the NOP and EAP apply in context
- make the NOP and EAP available to all staff and AOTTs who are involved in school swimming sessions at the pool. (These should be re-issued to all hirers when they are reviewed but the school should check, annually, with the pool management that they have not changed.)
- 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
- If the school's swimming co-ordinator changes, they must make a preliminary visit to become familiar with the pool and see how the NOP and EAP apply.
- The writing of NOPs and EAPs is considered further in section 10 and templates for them are given in Appendices B and C.

8. SWIMMING IN OTHER CONTEXTS

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 usually deep water pools and so, for teachers and physiotherapists, the First Aid at Work qualification is an appropriate qualification for life guarding the pool. Adults in the water are only able to supervise the young person they are assisting and should not be counted in the supervising ratios. The lifeguarding duties must be carried out by qualified people on the side of the pool. Physiotherapists should have completed a recognised professional course in managing hydrotherapy activities. 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 staff to work with experienced staff before they take full responsibility for sessions. This induction can take place within or between schools.

8.2 Using Pools on Educational Visits

Where school parties use swimming pools as part of an educational visit the above conditions should still be applied. Use is likely to be of a recreational nature. A qualified lifeguard must be on duty and teachers must work with the lifeguard to supervise the session. They should not stand together, or sit talking on poolside but should actively work together as part of a team safeguarding all the children. If the pool has no lifeguard cover and the school is providing its own lifeguard, arrangements should be made to ensure sole use of the pool, so that other guests do not increase the numbers in the water. Lifeguarding qualifications should be to the same standard as for a similar activity in the school's own or hired pool (see section 5). Where the lifeguarding duty is given to an appropriately qualified student, the teacher will retain overall supervision responsibilities to guarantee appropriate levels of behaviour and adherence to pool rules.

8.3 Open Water – rivers, lakes, reservoirs, canals or the sea

Swimming and paddling or otherwise entering the waters of river, canal, sea or lake should never be allowed as an impromptu group activity. The pleas of young people to be allowed to bathe – because it is hot weather, for example, or after a kayaking exercise - should be resisted where the bathing has not been considered as part of the overall plan. Bathing activities should take place only when a specific risk assessment has been completed and control measures put in to reduce risks to an acceptable level. It is good practice that, wherever possible, group leaders seek out recognised bathing areas that have official surveillance i.e. qualified lifeguard cover. Even then, group leaders should be aware that young people may mingle with members of the public and be lost to view. Young people should always be in sight and reasonable reach of their supervisors.

The group leader should:

- be aware that many children who drown are strong swimmers
- ascertain for themselves the level of the pupils' swimming ability
- check the weather
- be aware of the local conditions – such as currents, weeds, rip tides, a shelving, uneven or unstable bottom – using local information from the lifeguard, coastguard, harbourmaster, police or tourist information office
- beware of rocks, breakwaters and other potential hazards

- 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
- designate a safe area of water for use by the group;
- brief the group about the limits of the swimming area
- avoid crowded beaches where it is harder to see young people
- be aware of the dangerous effects of sudden immersion in cold water
- be aware of the dangers of paddling, especially for younger children
- ensure that young people have not eaten (for an hour) before swimming
- ensure the activity is suitable for the young people, especially any with special needs or disabilities
- adopt and explain the signals of distress and recall
- ensure that buoyancy aids, lifejackets etc. are used where appropriate
- carry out regular head counts
- be aware that it is not always possible to tell when someone is in difficulties.

Supervisors should:

- have clear roles – 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 constant vigilance
- divide their careful watching between staff who stand in the sea and look landward towards the group and staff who stay on land and watch the group from that vantage point
- give the young people their full, undivided attention
- always follow the advice or directions of a lifeguard
- never swim themselves unless it is to help a young person in distress
- not join in any of the games with young people
- advise young people to stay well within their depth
- be prepared to act immediately when a young person appears to be in difficulties
- ensure that young people leave the water immediately if they get too cold, especially if toes and fingers look blue or feel numb – could suggest the onset of hypothermia
- recognise that a young person in difficulty may not wave or shout – all of their energies could be focussed on trying to keep afloat.
- Jumping and diving, as from sea cliffs or gorge environments should be treated as a specialist adventure activity and be supervised accordingly only by a competent and qualified adventure activities leader. Supervising a low key activity next to deep water should receive extra consideration during the planning process and on the visit itself. (Refer to 2003 DfE and CCPR Water Margins document.)

The Outdoor Education Adviser Panel's advice is that leaders should not supervise any open water bathing unless there is a qualified open water lifeguard on hand. For further advice contact the: The Royal Lifesaving Society UK, River House, High St, Broom, Warwickshire B50 4HN (Tel: 01789 773994) www.lifesavers.org.uk.

9 SWIMMING CLOTHING AND EQUIPMENT

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. 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.

9.1 Goggles

The use of goggles is generally to be discouraged, but some children who swim frequently or whose eyes are susceptible to irritation may ask 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 by only purchasing goggles that conform to British Standard BS 5883 (1996). 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 perform certain aquatic activities safely.”

Goggles must be rinsed in pool water before use to prevent misting. Goggles must never be worn when diving, nor when the pool is crowded.

9.2 Jewellery

The wearing of jewellery whilst swimming is hazardous and must not be allowed, except where they cannot be removed for health, safety or religious reasons, when they must be made safe. This may mean taping over (for example) newly-fitted ear studs, medical bracelets or religious symbols, but staff must be aware that the usual tapes used for this purpose in PE lessons may come loose in water and a stronger, waterproof adhesive will be needed. If this cannot be achieved, the child may not be allowed to participate in swimming activities and may need to be given an alternative activity such as helping to evaluate the performance of other pupils.

10. POOL SAFETY OPERATING PROCEDURE (PSOP)

Schools with their own pools must undertake and regularly review their own risk assessments as a basis for determining safe operating procedures for their pool. From these they should write a Pool Safety Operating Procedure (PSOP) which can usually be divided into two parts:

- Normal Operating Procedure (NOP) to maintain safety in normal use
- Emergency Action Plan (EAP) detailing what everyone does if an emergency occurs.

These must be made available to other schools and hirers using the pool and must be reviewed and/or revised at least annually. 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. Staff 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. Schools using other schools' or public pools will need to be aware of the pool's NOP in order to ensure that they do what is expected of them to keep themselves and others safe and aware of the EAP to know what to do in an emergency. You must ask for copies of these documents before using the pool.

10.1 NORMAL OPERATING PROCEDURE (NOP)

Pitcheroak School's NOP is part of a separate document that can be found on the school's website under non-statutory policies. <http://www.pitcheroak.worcs.sch.uk/>

11. Covid-19 Swimming Guidelines

In light of the current Covid-19 pandemic the following guidance has been adopted from Swim England's 'returning to the pool' document:

- When delivering swimming lessons swimming teachers that are external to a school bubble should adhere to government guidance on social distancing;
- School teachers and teaching assistants that are internal to the bubble can replicate the same procedures through swimming lessons as they do in the classroom;
- All parties involved in the delivery of school swimming should have a dedicated officer or lead responsible for Covid-19 considerations, making sure that they are up to date with central or local government guidance. This person should be aware of the rules and guidelines set out by the facility;
- When determining the capacity of classes, providers should consider the advice on children and assessing risk in the pool as set out in the Swim England Guidance for Operators;
- Considerations should be made on how to reduce contacts and maximise distancing between those in school wherever possible and minimise the potential for contamination so far as is reasonably practicable;
- Teachers should deliver from poolside;
- Teachers should adhere to government guidance on social distancing;
- Providers should evaluate the number of personnel on poolside to maintain social distancing;
- Providers of school swimming should review available pool space to allow for correct social distancing, including entry and exit points;
- Providers should allow sufficient time between lessons for cleaning and to reduce the chance of clustering groups;
- All equipment should be sanitised before and after each activity;
- Equipment that cannot be sanitised in the pool should be appropriately cleaned between activities. This should include surfaces in high traffic areas such as handrails and towel hooks;
- Risk assessment's to be completed by the school which aligns with the providers Covid-19 procedures;

- Adaptations and considerations of lessons and changing provision for any pupils with SEND to be confirmed with the provider.

As of 14.10.21 Covid-19 restrictions have been eased meaning pre-pandemic guidance can be adhered to.

Condition of hire

Updated hire agreement form for 2021-22 can be obtained from the Finance Manager at Pitcheroak School.

10.2 EMERGENCY ACTION PLAN (EAP)

Pitcheroak School's EAP is part of a separate document that can be found on the school's website under non-statutory policies. <http://www.pitcheroak.worcs.sch.uk/>

11. POOL RULES

11.1 Rules for Pupils

The pool rules should be explained to all pupils before their first swimming lesson of the school year. They should also be reminded at the start of each term, ideally when the emergency procedures are tested and checked with pupils. Rules will need to be determined by local circumstances, but should generally include:

- 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, 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
- to pay attention on one short blast of the whistle
- to leave the pool on one long blast of the whistle
- all instructions from staff to be obeyed promptly.

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

11.2 Rules for Staff

There are rules to ensure that lifeguards remain vigilant at all times. The following should also be practised by school staff supporting qualified lifeguards:

- never leave the poolside unattended
- keep alert and never turn your back on the pool or cease watching the pool when on duty. Move position every five minutes or so divide the area up into zones and

constantly scan the area, counting heads, watching out for vulnerable or weak swimmers.

12. DIVING

Additional hazards are created when swimmers are allowed to dive into the pool. These need to be carefully managed. The teaching of diving should only be undertaken by an appropriately qualified teacher or swimming instructor. No diving shall be permitted in shallow water. A minimum depth of at least the full reach height of the pupil (i.e. standing on the bottom of the pool with arms fully extended above the head) and never less than 1.5 metres depth of water and at least 7.6 metres forward clearance is required. The pool freeboard (height of poolside above the water level) must not exceed 0.38 metres. Only very flat horizontal dives (i.e. racing starts) should be taught in school swimming lessons and then only if the teacher or instructor holds an SEQ Teacher Certificate (or higher) and is fully conversant with the contents of the current SEQ Teaching and Coaching Regulations. Looking to check for clear water immediately before diving must be taught and strictly observed. Prolonged swimming under water following a dive must be discouraged. Any diving blocks or stages must conform to Federation International de Natation (FINA)/ Swim England regulations.

13. POOL PLANT OPERATION AND POOL MANAGEMENT

13.1 In Public Pools

Schools are not required to check the qualifications of those managing the pool and plant at public pools that they use, 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. If their concerns are not addressed satisfactorily within a reasonable time, they should contact the LA for advice (See section 16).

13.2 Record Keeping for Swimming

Records of incidents and accidents that occur in the swimming pool or pool area should be kept and made available at both venues. All the above records must be retained for a minimum of three years.

14. CONDITIONS OF HIRE

14.1 Pool operators cannot delegate responsibility for what happens in their pools, therefore if a school pool is hired to an outside organisation the school will need to ensure that the outside organisation will use the pool in a safe manner. 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. The mechanism for this is initially the agreement to hire and any conditions of hire imposed by the organisation. The conditions will usually be re-enforced in the NOP and EAP. 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 standard form will suffice, 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.

14.2 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 and EAP
- appropriate third party liability insurance

15. SAFEGUARDING CHILDREN (CHILD PROTECTION)

15.1 The LA and the school have their own child protection procedures and so too should the pool. It is important that the pool procedures relate 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.

15.2 Each pool should have a designated person with responsibility for child protection who should liaise with the designated teacher in the event of any 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.

15.3 All persons working with children should have an Enhanced DBS Disclosure.

15.4 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 – see section 4. Supervision should be appropriate to the needs and age of the young people concerned and sensitive to the potential for embarrassment.

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

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

In these circumstances the adult should also 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. Where physical contact or support will need to be given to develop skills and technique, teachers should write to parents before the sessions start to explain that this may be necessary on occasions. This could be included with the general information that the school gives parents about swimming lessons.

15.6 When supervising children changing, adults should:

- avoid any visually intrusive behaviour
- announce their intention of entering the changing room
- avoid remaining in the room unless pupil needs require it.
- Adults should not:
- change in the same place as children
- shower with children.

15.7 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.

15.8 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.

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

16. USEFUL CONTACTS AND SOURCES OF INFORMATION

Advice on	Contact Name	Telephone	Email address
Curriculum	Colette Maynard, Subject Adviser, Physical Education	01299 873968	cmaynard@worcestershire.gov.uk
Curriculum	Nick Price, Teacher Adviser, Physical Education	01299 873968	nickprice@worcestershire.gov.uk
Health and Safety	Peter Babb, Health and Safety Co-ordinator	01905 766189	pbabb@worcestershire.gov.uk
Child Protection	Sally Mills Safeguarding Officer		smills@worcestershire.gov.uk
Major Emergencies	WCC Emergency Planning Section	01905 766176 (in office hours) 07836 655 932 (outside office hours)	
Pool Lettings	Bosko Medakovic, Senior Projects Officer, Directorate of Children's Services		bmedakovic@worcestershire.gov.uk
Pool, Plant and Alarm Maintenance	Ian Hartley, Property Services	01905 766456	ihartley@worcestershire.gov.uk
Training for Pool	c/o Children's Services	01905 766189	pbabb@worcestershire.gov.uk

Plant Management	Health and Safety		
Biological Monitoring of Water Routine	Andrew Wood, Property Services	01905 766189 01905 766434	awood@worcestershire.gov.uk

WEBSITES

Swim England <https://www.swimming.org/swimengland/>

QCA lesson ideas www.nc.uk.net/safeswimming

Royal Life Saving Society www.lifesavers.org.uk

Institute of Sport and Recreation Management www.isrm.co.uk

Swimming Teachers' Association www.sta.co.uk

Pitcheroak School

Swimming Risk Assessment

Assessment conducted by: M. Wright	Job title: PE Co-ordinator	Covered by this assessment: Pupils attending swimming and staff
Date of assessment: 14.10.2021	Review interval: Annually	Date of next review: October 2022

Related documents
Health and Safety Policy

Risk Rating		Likelihood of occurrence		
		Probable	Possible	Remote
Likely impact	Major Causes major injury, disability or ill-health.	High (H)	High	Medium (M)
	Severe Causes injury requiring medical treatment.	High	Medium	Low (L)
	Minor Causes injury requiring first aid treatment.	Medium	Low	Low

Risk/Issue	Risk rating prior to action Major/Severe/Minor	Recommended controls	In place? Yes/No	Recommended further actions to be taken to reduce risks	By whom	Deadline	Risk rating following action H/M/L
Drowning – Pupil cannot support self in water.	Major	A minimum of 1 member of staff in the pool at all time.	Y	1 member of staff pool side at all times.	Teacher In charge		L
Evacuation	Major	Pupils should not be lifted by one person without a hoist.	Y	Personal Emergency Evacuation Plan (PEEP) to be put into practice.	All staff attending		L
Damaged or faulty equipment	Major	If the hoist is unavailable, pupil should be lifted by two adults.	Y	If hoist becomes damaged or faulty, manufacturer to be called immediately to organise a repair.	All staff attending		L
Behaviour	Low	Pupils are generally very well behaved and follows instruction well. Changes in behaviour should be taken seriously.	Y	If pupils become agitated or disruptive, pupils will be helped out of the pool before ascertaining what the problem is. Review risk assessment for pupil.	All staff attending		L
Use of wheelchair	Major	Pupil must not propel self in wheelchair when at poolside. Wheelchair must be pushed by member of staff. Pupil must not be left in wheelchair alone when poolside.	Y	Dependent on type of wheelchair and swimming pool operator, a specific poolside wheelchair may be provided.	All staff attending		L

Risk/Issue	Risk rating prior to action Major/Severe/Minor	Recommended controls	In place? Yes/No	Recommended further actions to be taken to reduce risks	By whom	Deadline	Risk rating following action H/M/L
Balance and coordination	Major	Pupil to be supported at all times in the water where needed. Out of the water, pupil is always strapped into wheelchair if applicable.	Y	Consider using specialist personal flotation device for extra stability.	All staff attending		L
Slips and trips	Severe	Assistants to take extra care when poolside and in other areas where floors are wet. Floors meet health and safety standards.	Y	Poolside assistant to wear trainers with a good tread for grip.	Staff on poolside duty		L
Safeguarding	Major	Unless written into an Individual Healthcare Plan (IHCP), pupil will not receive assistance in intimate care.	Y	Consider the use of an additional staff member or adult to supervise.	All staff attending		L
Vision	Minor	Poolside assistant to keep pupil's glasses on hand for when pupil exits the pool. If pupil is not confident without glasses, they may wear them, so long as face is not in the water.	Y	Consider purchase of prescription goggles.	All staff attending		L
Incontinence	Major	Swimming pads are used.	Y	Consider using specialist incontinence swimwear.	All staff attending		L

Risk/Issue	Risk rating prior to action Major/Severe/Minor	Recommended controls	In place? Yes/No	Recommended further actions to be taken to reduce risks	By whom	Deadline	Risk rating following action H/M/L
		Pupil's pad is changed immediately prior to entering the pool and again on exiting the pool.					
Legionella and waterborne diseases.	Major	Regular water testing is completed by operator.	Y	Legionella risk assessment is completed by school.	Abbey Stadium		L
Biting floats	Major	Ensure pupils use floats in an appropriate manner relative to the learning environment.	Y	Remove floats where necessary	All staff attending		L
Awareness of poolside	Severe	Ensure pupils are aware of where the poolside is when conducting strokes to limit accidents/striking their head against the poolside. Swimming staff to work with specific pupils where necessary	Y	Reduce width distance to compensate for poolside.	All staff attending		L
Elevation from poolside whilst in water	Major	Behavioural expectations reinforced where necessary. Pupils to use the side of the pool as expected.	Y	Reinforce expectations and if the issue persists the pupil will be asked to have 'time-out' or removed from the session entirely.	All staff attending		L