



**OXFORDSHIRE
COUNTY COUNCIL**

Safe Practice in School Swimming Policy (Shallow Pools)

January 2024



**OXFORDSHIRE
COUNTY COUNCIL**



**Swim
England**



**ROYAL
LIFE SAVING
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Summary

The purpose of this document is to set out the policies and provide guidance on Safe Practice in School Swimming and Water Safety, whether at a school pool, hydrotherapy pool, public pool or during school visits. It aims to keep everyone involved in School Swimming safe. Included are the policies and procedures of Oxfordshire County Council (OCC) based on current national guidance, the Association for Physical Education (AfPE) and Swim England in relation to School Swimming and Water Safety lessons, swimming pool safety, and educational visits, which may include water-based activities.

[Health and safety in swimming pools - HSG179 \(hse.gov.uk\)](https://www.hse.gov.uk/hsg179/)

The appendices contain exemplar materials and greater detail on guidance.

This policy is for all OCC maintained schools. It is recommended that Academies, Foundation and Voluntary Aided schools also follow the guidance within the policy unless stand-alone policy exists.

Where schools use Leisure Provider pools, **partnership working is vital**, not only to keep pupils and staff safe, but also to ensure the inclusion of a breadth of aquatic opportunities, which meet the needs of all pupils.

Introduction

The following policy has been revised and updated by Oxfordshire County Council. It has been through consultation involving Oxfordshire Headteachers, Leisure Providers, Swimming Coordinators, Swim England and Royal Lifesaving Society (RLSS), to provide a valuable and accurately informed working document. It is intended to inform and support the following:

- Headteachers
- Governors
- Teachers, including poolside school support staff, with the 'duty of care' responsibility for the provision of School Swimming and Water Safety within their school
- Leisure Providers
- Swimming Teachers

The policy will ensure a consistent approach in the planning and delivery of safe, quality School Swimming and Water Safety lessons as noted in the DfE, Physical education programmes of study – all schools must provide swimming instruction either in Key Stage 1 or Key Stage 2.

'Swimming is a very inclusive, health-promoting activity that can be continued for life. Learning to swim and be confident in water not only saves lives but can also provide the essential foundation for individuals to access many water-based recreational activities. Aquatic activities include swimming, Water Safety activities, lifesaving, diving, and open-water swimming.' (afPE Safe Practice in Physical Education, School Sport, and Physical Activity 2020 edition)

'Swimming in clothes is common practice in water safety sessions as it helps to simulate real situations. These sessions should teach students how to conserve energy and body heat while staying afloat, using gentle swimming movements and holding specific body positions. Swimming teachers should take account of the fact that wearing clothes presents different challenges for swimmers in that clothes offer more resistance, which can result in swimmers tiring more easily and swimming more slowly.' (AfPE Safe Practice in Physical Education and School Sport and Physical Activity 2020 10th Edition p. 190 2.11.170)

Physical Education including Swimming is a National Curriculum Foundation Subject and thus STATUTORY.

All schools must provide Swimming instruction in either Key Stage 1 and/or Key Stage 2. In particular, pupils should be taught to:

- **swim competently, confidently and proficiently over a distance of at least 25m**
- **use a range of strokes effectively, such as front crawl, backstroke and breaststroke**
- **perform safe self-rescue in different water-based situations**

Swim England recommend that pupils should receive a minimum of 25 hours of School Swimming and Water Safety before the end of Key Stage 2.

Swimming is a highly beneficial life-saving activity. It supports the acquisition and development of physical literacy, along with skills for health and enjoyment. Swimming is 'Wet Physical Education'.

As a threshold skill, it also gives access to many other water-based recreational activities.

Swimming 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.

Nevertheless, it also carries the risks 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.**

Definitions

Teachers in Charge of School Swimming and Water Safety 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. These poolside assistants should be qualified to at least a minimum of Support tTeacher of School Swimming and Water Safety

Leisure Providers:

These are staff in pools coordinating and providing School Swimming and Water Safety who are employed by the Leisure facility.

Specialist Swimming Teacher:

The individual in charge of the School Swimming and Water Safety lesson, as a minimum, qualified to **Swim England SEQ Level 2 Teaching Swimming Qualification** or **STA Level 2 Certificate in Swimming Teaching**

Swimming Teacher Assistants:

Individuals that can work under the supervision of a Specialist Swimming Teacher, qualified to Swim England (ASA) UKCC Level 1 (for SHALLOW POOLS ONLY).

Lifeguard/Lifesaver:

The individual responsible for lifeguarding, rescue and resuscitation of swimmers in difficulty.

Responsibilities

Overall County Council Responsibility

OCC have a responsibility for ensuring safety in swimming in all maintained schools. As part of this responsibility, OCC provides the Safe Practice in School Swimming Policy.

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

School Responsibility - Governors and Headteachers

The Headteacher supported by the Governing Body must ensure that a nominated member of staff is delegated the responsibility of Teacher in Charge of School Swimming and Water Safety and applies the Safe Practice in School Swimming Policy to all aspects of School Swimming. This will incorporate the proper operation of the school's own swimming facility or use of a third-party pool. Governors should be confident that the school is managing their Duty of Care responsibilities to ensure the policy and procedures contained within this document are being applied. These include:

- **Risk Assessment** completion – member of staff should carry a copy of this with them, together with emergency contact numbers in the School Swimming folder (with copy held centrally by Headteacher)
- **Normal Operating Procedure (NOP) and Emergency Action Plan (EAP)** member of staff should ensure **all** staff accompanying pupils to School Swimming have read and understood the current NOP and EAP for that pool.
- Ensuring staff accompanying School Swimming are qualified to support the delivery of School Swimming and Water Safety and comply with their school's Safeguarding
 - Policy
- Ensuring relevant training for School Swimming is in place for staff
- Understanding what School Swimming qualifications allow staff to do and ensure staff are confident and competent to carry out their role in School Swimming
- Maintaining a central record of staff qualifications and training - the OCC Health & Safety Team will view such evidence at the annual H&S monitoring visit
- Keeping current copies of the 'Conditions of Hire' and Leisure Provider Insurance details within the School Swimming folder
- Ensuring that all relevant and up to date medical and health information is maintained within the School Swimming Folder

School Teacher in Charge of School Swimming and Water Safety

- Maintain School Swimming Folder (see Governor and Headteachers section above)
- Be in possession and understand all relevant and up to date NOP/EAP and Risk Assessments for the pool, and plan and risk assess the activities with your Specialist Swimming Teacher
- Complete Visit Notification Form – **Appendix N** (agreed by Headteacher)
- Undertake Risk Assessments (please refer to pages 13-15 and **Appendix A, B or C** – Model Risk Assessments), signed by all staff involved (including Headteacher). This will include separate written information on pupils with medical conditions and/or additional needs and **must** be shared with the Specialist Swimming Teacher prior to the School Swimming and Water Safety programme commencing. This information needs to be updated where necessary

- Complete and share relevant documents with Leisure Providers (Schools may choose to use the following forms: *Swimming Class Registers & Student Information (including information on pupils with medical conditions and/additional needs; information for Leisure Providers – Appendix M)*)

School Staff Accompanying Pupils to their School Swimming Lesson

e.g. Swim England Support teacher of School Swimming Certificate or RLSS National Rescue Award for Swimming Teachers and Coaches (NRASTC)

For all School Swimming and Water Safety lessons, appropriately trained members of school appointed staff, who know the children well, should accompany the class to the swimming pool (this applies to both school pools and Leisure Provider pools). In addition to the venue qualified Swimming Teacher and Lifesaver, there should be two members of school staff on poolside, one being a confident swimmer who is suitably qualified (Support Teacher of School Swimming/Lifesaver qualification). This is always dependent on risk assessment for: pupil numbers and abilities, and any known medical conditions and behavioural tendencies.

Support Teacher of School Swimming

- Online Course available at <https://www.swimming.org/ios/course-information/supportteacher-school-swimming/>
- Practical Course – please contact OCC Helpdesk: email healthandsafetyhelp@oxfordshire.gov.uk or Telephone 03300 240849

Lifesaver Course

- National Rescue Award for Swimming Teachers and Coaches (NRASTC) see <https://rlssuk.tahdah.me/event> or contact OCC Helpdesk: email healthandsafetyhelp@oxfordshire.gov.uk or Telephone 03300 240849

Swim England - NCTP Support Teacher of Swimming

This is the minimum requirement for School Staff delivering school swimming lessons in a School Pool Shallower than 1.2m.

Limitations:

- There must be at least 2 members with the Support Teacher of Swimming Qualification on poolside
- The group should be no larger than 20 pupils
- It is recommended that Schools with their own shallow pools qualify their staff to the 'Teacher of School Swimming' qualification
- A qualified Swim England '**Teacher of School Swimming**' can organise & evaluate session plans in line with NC and teach independently within a school swim programme alongside at least one other.
- A qualified Swim England "**Support Teacher of School Swimming**" must work under the supervision of a specialist swimming teacher, (eg **Swim England SEQ Level 2 Teaching Swimming Qualification or STA Level 2 Certificate in Swimming Teaching**)

If the school wishes, they can still employ a Specialist Swimming Teacher: (e.g. **Swim England SEQ Level 2 Teaching Swimming Qualification or STA Level 2 Certificate in Swimming Teaching**) in the place of 2 Support Teachers of Swimming

Whichever is used they need to:

- Understand their role in School Swimming
- Work in partnership with the Teacher in Charge of School Swimming and Water Safety 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 of the additional needs and medical conditions 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,
- Endeavour to make the lessons enjoyable
- Prepare, plan and teach high quality School Swimming and Water Safety lessons in partnership with the school appropriate to the pupils' age and ability – showing good understanding of National Curriculum requirements
- Ensure appropriate numbers of fully qualified lifeguards/lifesavers are on poolside ○ Understand their role and responsibility in the case of an emergency (EAPs)
- Be able to organise a number of other staff (pool staff or School Swimming staff) so that the teaching groups are a 'best fit' for the standards and ability stages of the students
- If in a leisure centre, liaise with the lifeguards and pool centre staff concerning the School Swimming session
- Recommended reading: Swim England "The Benefits of Teaching from Poolside"
<https://www.swimming.org/swimengland/benefits-teaching-poolside/>

Lifesavers/Lifeguards

- Should directly supervise the pool and the pool users, exercising appropriate levels of control. (Note: the lifesaver/lifeguard should remain on the poolside at all times except in the case of an emergency)
- Brief pool users in advance regarding rules (e.g., no diving, running, etc.)
- Communicate effectively with pool users
- Anticipate problems and prevent accidents
- Intervene to prevent behaviour which is unsafe
- Carry out an emergency rescue if required
- Give immediate first aid to any casualty

Lifesaver/Lifeguard Courses:

- National Rescue Award for Swimming Teachers and Coaches (NRASTC) see <https://rlssuk.tahdah.me/event> or contact OCC Helpdesk: email healthandsafetyhelp@oxfordshire.gov.uk or Telephone 03300 240849
- National Pool Lifeguard (NPLQ) see <https://rlssuk.tahdah.me/event> or contact OCC Helpdesk: email healthandsafetyhelp@oxfordshire.gov.uk or Telephone 03300 240849

School Staff Accompanying Pupils to School Swimming Lessons

For all School Swimming and Water Safety lessons, appropriately trained members of school appointed staff, who know the children well, should accompany the class to the swimming pool (this applies to both school pools and Leisure Provider pools). Primary School Teachers or TAs should accompany their own class to swimming, whenever possible, as they know their children in a unique way. There should always be someone on poolside who knows the specific medical or additional needs of the pupils, as detailed in the risk assessment.

The Headteacher as the designated 'responsible person' will have overall **DUTY OF CARE** that applies for any activity in which children are involved and they cannot transfer that duty of care **which is non-delegable to a third-party provider dictated by case law - Supreme Court ruling in 2013**. This applies to all activities within the school curriculum and extracurricular activities organised by the school during and outside of school hours, whether on or off school premises.

Ideally, there should be two members of school staff on poolside, at least **one** being a confident swimmer who is suitably qualified (Support Teacher of School Swimming/Lifesaver qualification). The responsible person with the school 'duty of care' **MUST** be completely confident that appropriate safety control measures are '**suitable and sufficient**' for **ALL** swim sessions! The consequences of not having the necessary safety precautions, in the event of an incident, could have subsequent legal ramifications for venue and/or school staff, the local authority or Trust.

During School Swimming, the duty of care remains with the school. Swimming Teachers will be employed to teach of the lesson, but it is essential the school staff remain on poolside.

There should be a nominated member of staff accompanying each group who holds responsibility for the:

- *progress of pupils*
- *assessing confidence and competence of accompanying staff (with guidance from Leisure Provider staff)*
- *enforcement of policies and procedures*
- *Sharing of procedures and standards to all Staff involved in the School Swimming and Water Safety lesson*

The Association for Physical Education (AfPE) states: '*Where specialist Swimming Teachers are employed to lead the lesson, it is strongly recommended that additional **school staff remain on poolside** to provide an assisting role.*'

All school staff accompanying pupils to swimming lessons should:

- *be clear about what their qualification enables them to do. They should ensure that their qualifications are kept up to date and/or refreshed when required*
- *demonstrate good knowledge and be able to communicate this clearly to the students*
- *adapt their approach to suit the needs of different students*
- *ensure they always maintain a good viewing position - this often means having to move frequently to overcome anything that makes visibility difficult (e.g., glare, shadow, sunlight)*
- *Not enter the water unless instructed to do so in an emergency*

- *Maintain good relationships with the pool operators and specialist swimming teachers, ensuring that communication is effective in ways that benefit the students and that roles and responsibilities regarding water safety cover remain clear and understood*

Additionally, they should:

- *be a confident swimmer*
- *be given a clear role and understand the limits of their role*
- *be confident on poolside*
- *effectively and appropriately communicate with each other and Leisure Provider staff on safety issues*
- *be suitably dressed for their role*
- *ensure children are appropriately supervised when changing*
- *ensure children are always under control and monitor behaviour during the activity from start to finish*
- *take head counts before, during and after sessions. This should be recorded in the swimming registers*
- *Know, understand and enforce the NOP and EAP; 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*
- ***remain on poolside to provide an assisting role to support the School Swimming Lesson (they must hold a minimum Swim England Support Teacher of School Swimming Certificate or Lifesaving Qualification – please refer to the section on Qualifications, page 8)***
- *hold responsibility for reporting on the progress of School Swimming (through ongoing monitoring and guidance from Leisure Provider staff). Identify those pupils unlikely to meet the minimum requirements for National Curriculum Swimming*
- *be aware of the additional needs or medical conditions of the pupils they are teaching so that correct measures/precautions can be put in place with guidance from the Specialist Swimming Teacher*

(Based on AfPE. Safe Practice in Physical Education, School Sport and Physical Activity, 2016 Edition)

Swimming Teachers also have a duty of care for the pupils directly in their control and for ensuring an appropriate School Swimming and Water Safety programme for the group. It is the responsibility of the school staff to monitor the progress of the pupils (with guidance from the Specialist Swimming Teacher), regardless of who teaches them, equally the teaching programme needs to be agreed before the course and if necessary, moderated during the course.

Having a teacher standing on the side passively watching is a massive waste of talent and energy, which could otherwise benefit the class. Involvement, not simply lesson observation, not only reduces teacher pupil ratio, but also enhances the quality of experience for the pupils concerned.

Staff should not be deployed in a poolside role however if they:

- *Lack confidence in carrying out such a role*
- *Cannot swim*
- *Are reticent about being on the poolside*

Staff should have the opportunity to express a lack of confidence or ability before being deployed in a poolside role.

(AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2020 10th Edition
p. 192 2.11.188-189)

Normal Operating Procedure (NOP)

For some children, School Swimming and Water Safety could be their first experience of being in a swimming pool. It is important that they know and understand the rules of the 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 (NOP) for the pool being used for School Swimming, to ensure that they are clear on their role and responsibilities during normal operations to maintain safety. The School Swimming Checklist (**Appendix F**) may be a useful document for school staff.

Schools with their own pools will need to draw up or review their own risk assessment as a basis for writing the NOP for their pool. This requires reviewing at least annually to ensure it is up to date and relevant.

School staff working in the pool must receive appropriate induction on the NOP which must be recorded by the school, signed by the person delivering the induction and kept on file.

Emergency Action Plan (EAP)

An Emergency Action Plan (EAP) details roles and responsibilities in the event of an emergency.

The EAP is the responsibility of a Leisure Provider when a third-party pool is being used. The responsibility for maintaining a safe swimming pool and building lies with the Leisure Provider when this is the case.

All staff must receive an induction 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.

Schools with their own pools will need to draw up or review their own risk assessment as a basis for writing the EAP for their pool. This requires reviewing at least annually to ensure it is up to date and relevant.

Safety signs, including arrangements in the event of an emergency, must be clearly visible in relevant areas of the pool area and students need to be made aware of these.

School staff in conjunction with Leisure Provider staff, need to ensure that, for students for whom English is not their first language, those who are visually impaired or have difficulty in reading, understand all safety signs.

All school classes should run emergency practice drills to evacuate the water and summon assistance during the first lesson of each term (and then regularly afterwards) in order that both staff and pupils recognise and understand emergency signals and procedures and know how to respond to them.

Space (foil) blankets should be available near emergency exits. Consideration needs to be given to:

- Students leaving the pool during an emergency with bare feet
- Students with additional needs or physical disabilities

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 checked at the start of every lesson.

Safety equipment such as poles, torpedoes, throwing ropes or throw bags, first aid provision (including emergency blankets) and emergency alarms need to be fit for purpose and sufficient in quantity. Equipment needs to be accessible and readily available when needed without creating additional hazards to pool users.

All pools must be equipped with an **alarm** or alternative backup in the event of an accident or incident to ensure support can be summoned quickly. These need to be regularly checked, records kept and an initialled checklist available by the alarm. If the pool has no alarm, there should be a landline phone on poolside which is checked before each lesson. **Access to emergency services must be guaranteed at all times the pool is in use.** Mobile phones are also appropriate as a backup and signals and battery life should be checked on arrival at poolside prior to the lesson.

All pools need to have a clear procedure for removing **pupils with physical disabilities**. Where a pool has a spinal board/special recovery stretcher, staff should receive training in this. It is recommended that special schools have a spinal board on poolside. Specialist training will be required for this situation.

A variety of teaching and flotation aids should be available. Equipment should:

- conform to any British standard
- be checked before the lesson to ensure it is safe to use and there are no defects
- be close at hand for ease of access during lesson but be kept tidily on poolside to minimise trip hazards
- be used appropriately to avoid over-reliance
- **not be given to non-swimmers to allow them into water out of their ability depth**
- be appropriate and safe for the needs of students
- be correctly fitted or held according to the design and purpose of the aid
- be regularly cleaned with an appropriate sanitising agent and preferably air dried

Any specialist electrical equipment required on poolside needs to be risk assessed

- designed for use in an aquatic environment
- of low voltage or battery operated
- located so as not to create an additional hazard
- have current circuit breakers attached
- PAT tested annually
- checked regularly

No one in the water should handle any electrical equipment.

<p style="text-align: center;">NOPs</p> <p style="text-align: center;">Normal Operating Procedure</p>	<p style="text-align: center;">EAPs</p> <p style="text-align: center;">Emergency Action Plan</p>
<p><i>These are the day-to-day organisational systems based on risk assessment, and would typically include information relating to:</i></p> <ul style="list-style-type: none"> ● <i>pool design and depth</i> ● <i>potential areas of risk</i> ● <i>arrangements for lessons</i> ● <i>responsibility for safety</i> ● <i>staffing levels and qualifications</i> ● <i>supervision and student conduct</i> ● <i>arrangements for students with particular needs (e.g., very young children, or those with SEND or medical conditions)</i> ● <i>pool's safety equipment</i> ● <i>clothing and personal equipment</i> ● <i>maximum numbers</i> ● <i>first aid provision</i> ● <i>water quality</i> 	<p><i>This should establish who assumes leadership in managing emergencies and the action to be taken in relation to such issues as:</i></p> <ul style="list-style-type: none"> ● <i>serious injury to bather</i> ● <i>dealing with casualties in the water</i> ● <i>sudden overcrowding in a public pool</i> ● <i>sudden lack of water clarity</i> ● <i>disorderly behaviour</i> ● <i>faecal/blood/vomit contamination</i> ● <i>emergency evacuation due to:</i> <ul style="list-style-type: none"> - <i>fire and fire alarm</i> - <i>bomb threat</i> - <i>power and lighting failure</i> - <i>structural failure</i> - <i>uncontrolled toxic-gas emission</i>

(AfPE Safe Practice in Physical Education and School Sport and Physical Activity 2020 10th Edition p. 134 2.8.134)

Pool Rules

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

The pool rules should be displayed and explained to all pupils before their first School 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). The following are examples of standard pool rules. It is by no means a comprehensive list.

- Pupils must not enter onto poolside unless a lifeguard/lifesaver is present
- Pupils must not leave the pool without permission, nor return without reporting to the person in charge
- Pupils must not approach or enter the water until instructed to do so
- Pupils must walk, not run, on poolside
- Pupils must respond immediately to all instructions
- All those on poolside must understand and respond appropriately to pool emergency procedures
- Report any unacceptable, unsafe behaviour
- No food to be consumed on poolside, including sweets and gum
- No shouting
- No jumping or diving unless instructed to do so*
- No jewellery to be worn
- No outdoor shoes on poolside
- Swim caps must be worn and other hygiene procedures for the pool followed
- Goggles may be worn if that is the school's' policy
- Report any illness
- Medication that may be required should be on poolside
- Pupils must understand that poor and inappropriate behaviour will have consequences and they may be removed from the lesson(s)

*Only Swim England Level 2 / STA Level 2 Certificate in Teaching Swimming Teachers are qualified to teach diving. Refer to the **Diving Appendix** for further clarification.

The pool's NOP should be checked before allowing jumping in, as water may be too shallow. Pool depth needs to be at least 1m, although Swim England advise a risk assessment to be undertaken before permitting jumping to take place into water of less than 1.5m.

Risk Assessment

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 must be suitable and sufficient under H&S Law and associated safe systems of work identified to manage all foreseeable risks related to the activity.**

Swim England, 2017 (no longer available). Safe Supervision for Teaching and Coaching Swimming, highlights six important factors These are:

Pool design

The suitability of the general design of the pool area for teaching and coaching includes:

- *shape and blind spots*
- *special water features such as sprays, inlets and wave machines*
- *blind spots resulting from the position of features and equipment*
- *glare, reflection, lighting and noise*

Depth

Its importance in relation to the ability and height of the pupils include:

- *the depth and extent of shallow water areas*
- *the extent of deep-water areas*
- *the pool floor profile, in particular sudden changes in depth*
- *the possibility of being able to segregate the shallow water area (e.g., roping off and using a boom)*

Water quality

Two factors need to be considered:

- *the temperature of the pool water (and the air) in respect of comfort - bearing in mind pupils' size, age and physical ability*
- *clarity of the pool water*

Pool organisation

The arrangements of the lesson must be considered:

- *who has the responsibility for the pool?*
- *is there exclusivity of use?*
- *is there shared use with other activities?*
- *if use is shared what are the implications? (e.g., lifeguarding responsibilities or Changing Rooms exclusivity)*
- *Nature of activities*
- *Access/admission arrangements*

Staffing

The skills and experience of staff and the ratio of pupils to teachers/coaches are important therefore consideration needs to be given to:

- *the qualification and number of teachers, coaches and lifeguards/lifesavers required*
- *the skill of teachers, coaches and lifeguards/lifesavers*
- *the degree of support and help provided by appropriate helpers, including parents, school assistants and auxiliaries*

Pupils and ability

The factors to be considered include:

- *the age of pupils*
- *the range of swimming ability. This should be known by the teacher or Specialist Swimming Teacher and each new pupil should be checked at the first lesson, in shallow water*
- *the use of flotation aids*
- *the ability of pupils to comprehend instructions including their command of the language in which the lesson is taught*
- *Medical/additional needs/behavioural tendencies*

The school must provide the Specialist Swimming Teacher with a register, up to date medical information and any other relevant information (e.g. Additional Needs) about the children, at least one week before the swimming programme takes place. The completed register of children present should be updated and handed to the Specialist Swimming Teacher for them to check before each lesson (see **Appendix J**).

Accompanying school staff are expected to undertake a dynamic risk assessment in situ each time they attend the pool. Staff should take action to control any identified changes such as:

- Water quality and temperature
- Integrity of pool enclosure/building
- Availability and condition of rescue/emergency equipment
- The age, range of ability and numbers of children in each class
- The activities they will be undertaking
- The qualifications of the people leading and supporting the session
- Known additional needs/medical conditions/behavioural tendencies
- Weather conditions (if the pool is an outdoor facility)

If in any doubt about the safety of the lesson, do not proceed!

Leisure Centre or other Pools

If a Leisure Centre or other pool is used at any time, the school need to make a judgement if the pool is safe and appropriate for School Swimming. Where public pools are used regularly for swimming lessons, the school and Leisure Provider should arrange an induction on the NOP and EAP 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, medical conditions of pupils, any behavioural tendencies

(N.B. the appendices listed at the back of this policy contain model procedures and forms which must be made specific for each school and pool).

Safeguarding

OCC and the school will have their own Child Protection Procedures and so too should the pool. It is important that the pool procedures relate to those of the County Council. A school using a pool, other than their own should establish a protocol identifying the relationship between their respective procedures.

The school should assure themselves that the centre has carried out appropriate DBS checks and undertaken any other relevant safeguarding vetting checks and that any staff members working in “regulated activity” are not barred from working with children.” Each school should have a designated person with responsibility for Child Protection, the Designated Safeguarding Lead.

When supervising children changing or assisting them 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 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
- 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. School Staff should also refer to their school code of conduct/staff behaviour policy or safe practice document.

Swim England guidance for “Best Practice within your Swimming Lessons” can be found here: <https://www.swimming.org/swimengland/best-practice-within-swimming-lessons/>

The protocols Swim England suggest include:

- Ensure there is a system included within the Pool’s NOP/EAP 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 Teachers 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 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 their forms for their records and further reported to County via

<https://intranet.oxfordshire.gov.uk/cms/content/reporting-accident-online>. Academies will have their own reporting procedures.

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/carer 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.

All persons working with children frequently and / or intensively or who are working in “regulated activity” must have a relevant DBS Check and that any other relevant safeguarding vetting checks have been undertaken which should be shown with the hire agreement if these are not school or OCC staff.

Medical Information

The Headteacher/School Teacher in Charge of Swimming should ensure that all relevant medical and health information is maintained within the School Swimming Folder. This must be regularly reviewed, and updated as required

It is a requirement that all relevant medical conditions are documented on each school's swimming register and Risk Assessment; and that each Specialist Swimming Teacher and Accompanying School Staff must be in possession of all medical information one week prior to that child swimming (*Swimming class registers including information on pupils with medical conditions and/additional needs - information for Leisure Providers - Appendix M*). This will need updating when necessary.

If a child experiences a new medical condition during a School Swimming lesson, this must be documented in writing by the Teacher in Charge of School Swimming and Water Safety and additionally recorded in the Accidents Register. School staff should discuss the condition with the Parent/Guardian/Carer of the child and review whether the pupil is able to continue swimming. This will ensure that safe procedures can be put in place before the child participates in the next swimming lesson.

It is the responsibility of the school to ensure that all medication (including inhalers) is accessible at all times on poolside.

A child will not be allowed to swim if their medication is not available, unless an emergency salbutamol kit (with a 'spacer') is available from the school: refer to Department of Health, (2015) [Guidance on the use of salbutamol inhalers in schools](#) and Department of Health, (2017) [Guidance on the use of Adrenaline Auto-injectors in Schools](#)

Written permission from parents may be required prior to allowing a child with a particular medical condition to participate in the School Swimming programme. The school may need to seek help from outside organisations to understand how aquatic activities may affect the child.

The requirements for students who suffer with seizures may vary depending on whether an effective medication management regime is in place, the effectiveness of this in controlling the onset of episodes and whether the child has a history of episodes whilst swimming. Each child should be **Risk Assessed** separately to determine the support they require. Some may require 1 to 1 support in the water and some a dedicated spotter on poolside,

Using a 'buddy' system with a student or helper in the water can provide non-intrusive supervision which also avoids embarrassment on behalf of the child.

Managing Periods and School Swimming Lessons

The general topic of 'periods' often presents a barrier to physical activity. In the following link Swim England and AFPe provide short and helpful advice on the topic [Managing-Periods-and-School-Swimming-Lessons.pdf \(afpe.org.uk\)](#)

First Aid Arrangements

All schools should ensure they have procedures, including an in-date First Aid Kit, in place for First Aid including travel to/from and at the pool.

In the event of an emergency evacuation, emergency foil blankets should be available for all swimmers and clearly labelled.

There must be a member of staff with an appropriate First Aid qualification on site at all times when the pool is in use. In pools used by children under 8, a Paediatric First Aider should be present. In public pools this is the responsibility of the pool operator.

- Accidents/Incidents requiring first aid need to be recorded on an accident form/book. Schools hiring the pool must request a copy of the form for their own records,
- Accidents/Incidents should be reported to the OCC Health and Safety Team (maintained schools only, academy status schools will have their own procedures) and if warranted it may require reporting to the HSE under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR)

HSE. How to make a RIDDOR Report. <https://www.hse.gov.uk/riddor/report.htm>

Supervision of Changing Rooms

Parents/guardians should be informed of changing arrangements for school swimming lessons.

Accompanying school staff are responsible for providing appropriate supervision whilst the pupils are changing.

- Only staff of the appropriate gender should enter the changing room, unless there is an emergency.
- Using members of the opposite gender to supervise mixed-gender groups in separate changing rooms is acceptable unless there are significant elements of relative intimate contact that may affect the dignity, comfort and confidence of either pupils or staff.
- A mixed gender group of pupils under the age of seven years may use an open plan, single sex changing area with agreement from pool management.
- Discuss changing arrangements with your leisure provider before swimming sessions commence.
- There should never be a situation where a member of staff is left alone with a child. Should this incident arise, this must be reported on return to school. All the pupils should remain together in a group. Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise pupils and that pupils are safeguarded from members of the public.
- Where additional help is required, if, for example, a child has additional needs, a second adult must be present and both the pupil and parent/carer's consent must be sought.

NSPCC Safeguarding considerations for getting changed at school.

<https://learning.nspcc.org.uk/research-resources/schools/safeguarding-considerationschanging-rooms>

Facilities for Transgender Students

It is always best to ask the student involved what changing space will work best for them. This may be male changing, female changing or the unisex accessible toilet. Teachers also need to be prepared for the possibility that where they choose to change may vary from lesson to lesson or week to week. Schools are advised to consider each situation uniquely and sensitively. Staff should speak openly and honestly about participation in school swimming and how potentially difficult situations can be overcome.

Toilets and changing facilities are often deemed the most sensitive of all the issues for transgender students, and there is much debate around the inclusion of trans young people in gender-segregated facilities. Concerns usually stem from a worry that young trans people may find themselves in a vulnerable position and may be subject to transphobic bullying or unwanted attention that has the potential to escalate to something more serious such as physical or emotional harm. Equally, young trans people want to be able to "pass" as their true gender and want to be seen and treated as such. Trans students should be able to use the facilities of their preferred gender. If a child or young person is not comfortable in using these facilities, then an accessible toilet/changing area should be provided.

Changing facilities need to be managed safely and sensibly. In general, schools can apply the same guidelines as they do for toilets. It is advisable to conduct a RA and, where appropriate, provide facilities that ensure privacy and safety.

(Association for Physical Education, AfPE, 'Safe Practice in Physical Education, School Sport and Physical Activity. P200-201, 2.12.37-2.12.42 2020).

Swimming Clothing and Equipment

Teacher Clothing and Equipment

School staff should change into suitable footwear to be able to move easily around poolside and not bring outdoor dirt onto the pool surround on their feet.

School staff should wear clothes suitable to the environment, humidity and temperature of the pool and appropriate to the unlikely possibility of having to go into the pool to assist with the rescue of a child.

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

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

Whistle Drill

An example of a Whistle Drill might be:

- One short blast - Calls for attention of pool users
- Two short blasts - Calls for the attention of a lifeguard or member of staff
- Three short blasts - Indicates a lifeguard taking emergency action

N.B. Schools should refer to their NOP/EAP for communication signals as these are likely to vary from pool to pool.

Pupils' Swimming Attire

Pupils should wear appropriate costumes for swimming that conform to safety, cultural and teaching requirements. Swimming hats must be worn and all jewellery removed. Where pupils may not be able to remove stud earrings, these must be taped. Where the school accepts taping, the teacher supervising the group has the legal responsibility to ensure that the taping is fit for purpose. Body jewellery should be removed or taped to a safe standard.

Rash Vests can be worn when medically required but only by prior agreement between the school and parents/carers.

It is important that swimming clothing is relatively tight fitting in order to minimise the effect of drag that waterlogged clothing can create (as this is dangerous for weak swimmers). Also, loose fitting shorts can trap the hands or feet of other swimmers. Sensitivity is required to ensure the correct balance when cultural demands require looser fitting garments (working with leisure providers to accommodate needs) and the need to be able to see the movements that limbs and joints are making in the water to ensure appropriate learning.

'Comment on Meeting the Needs of Muslim Pupils in State Schools: Information and Guidance for Schools,' British Muslim Council, 2007, Association for Physical Education, Chapter 3, pages 30, 31 and 38:

'Any swallowing of water is always unintentional in swimming, whether during Ramadan or not, due to the adverse effects this has on the activity and the distasteful chemical balance of the water. This issue should not impact on a Muslim pupil participating in the development of a life skill during the period of Ramadan.'

Many schools try to implement single-sexed lessons where possible when the proportion of Muslim pupils is high as well as seeking to abide by the principles of decency, dignity, modesty and privacy during changing, so far as the facilities allow.

Whilst swimming is a statutory experience in the national curriculum, and in order to ensure the development of a genuine life skill, the option for pupils to be excused the activity cannot be implemented other than to place the school and possibly the individual teacher in contravention of laws of the land.

Whilst it is a statutory experience then the religious requirements need to be flexible in order to meet the statutory requirement set out by the Government.'

Medical Aid wristbands can now be made of soft materials with velcro fastenings, and these are considered acceptable. It is a parents' responsibility to check that there are no hard edges that may cause injury. If the medical bracelet is made of other materials, it should be covered with tape, padding or a soft, sports-style wristband.

Fitness watches/wristbands should be removed for school swimming. Religious artefacts need to be removed or made safe. Health and safety law would usually take precedence over equality law because of the implication of the "safety of others" and the specific duty set out in the Health and Safety at Work etc Act 1974. If, following discussions with parents and faith leaders, their removal becomes contentious, the activity and involvement of the wearer needs to be suitably modified to mitigate undue risk (AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2020 10th Edition p. 214 2.14.35-36)

Pupils should not be excluded from school swimming because of verrucae. Swim England advice includes discouraging the use of devices such as plastic socks to protect the feet, as with elasticated knee bandages, the socks have limited value other than to attract attention. They advise the use of a waterproof plaster to be sufficient to cover the verruca during lessons. Alternatively, over the counter treatments e.g. Bazuka provide a layer of protection over the verrucae.

Guidance on Goggles

Association for Physical Education and Swim England Guidance

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 pupils are comfortable swimming with or without goggles so they don't panic in an unexpected situation.

Goggles are not normally recommended for school swimming lessons, where swimmers have poor control in the water (beginners), or for single short races in galas. The pupil's attention can be compromised by the need to adjust and replace goggles. However, goggles can be helpful in assisting pupils learn to swim by making them feel more comfortable and can help them to develop their aquatic breathing skills. Any club swimmers or pupils training regularly will usually wear goggles to protect them from exposing their eyes to the effect of the chemicals in the water for long periods of time.

AfPE advises that goggles are not generally used for swimming lessons, but indicate that Schools and Leisure Providers may allow children to wear them when appropriate and when a thorough Risk Assessment has taken place into safety implications of using them. (*AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2020 10th Edition p. 207-208 2.13.36-52*)

The ultimate decision to allow swimming goggles during lessons is down to the school's PE Policy in cooperation with the School Swimming Provider, following thorough Risk Assessment of their use but we would recommend that, generally, children are not encouraged to learn to swim in goggles.

Pupils with medical eye conditions may 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 pupil's needs remains critical in determining the wearing of goggles.

The Swimming Teacher will ultimately decide whether the wearing of goggles is appropriate for each activity undertaken. Pupils should be asked to remove their goggles for self-rescue and water-based games e.g. water polo. Goggles must NOT be worn when learning to dive. For some swimmers where speed and competence increases, there may be a need to wear goggles. Club swimmers for example will benefit from the use of goggles due to the longer daily exposure to chlorine. Pupils who are very short sighted may need to wear prescription goggles.

The Swimming Teacher 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 pupil should be asked to remove the goggles. Ill-fitting goggles may mist up or fill up with water, thus affecting visibility. **School staff should not fit or adjust a pupil's goggles.**

Parents should be informed of their responsibility to **teach their child to put on and take off goggles in the correct and safe fashion** (slipping them off the head and not by stretching the retaining band away from the face as wet plastic is slippery and can cause injury to the eye area). This information should be included in the school's Risk Assessment. An example letter can be found in **Appendix G**.

Swimming goggles, if used, should be made of unbreakable plastic or rubber and should conform to British Standard (BS 5883:1996). This requires the packaging to contain instructions regarding safely putting on and removing goggles.

An incorrect chemical balance in the pool can cause eye irritation, therefore if pupils complain of this, the pool operator needs to be informed.

Religious and Cultural Issues within School Swimming

A number of religious and cultural issues need consideration for school swimming such as:

- wearing certain items of clothing and/or religious artefacts, e.g., some faiths will have issues with unacceptable exposure of the body; pupils may be expected to wear religious adornments,
- single or mixed gender groupings for school swimming,
- Religious/cultural festivals such as Ramadan, and the implications of these, e.g. fasting during Ramadan may result in low energy levels; a risk of dehydration and lower concentration levels,
- cultural expectations in PE and School Swimming,
- EAL pupils - ensuring understanding of all safety procedures and task requirements.

What should schools put in place?

- Hold ongoing discussions with local faith leaders and parents so they understand school policies around school swimming,
- Ensure that safe practice is followed but accommodate adjustments to swimming attire (e.g., allow long costumes or leggings whilst ensuring clothing is not heavy or likely to flap),
- Provide acceptable levels of privacy to consider any mixed-gender issues,
- Where required, only if practical and feasible, build single sex teaching into the swimming programme.
- Ensure EAL pupils are supported to ensure they understand key safety signals and phrases identified through the Risk Assessment such as 'STOP'; support staff can attract and maintain their attention in the event of an emergency; consider using a Buddy system.

Other recommended reading: Symeon Dagkas, Tansin Benn and Haifaa Jawad. Multiple voices: improving participation of Muslim girls in physical education and school sport. Sport, Education and Society, Vol 16, 2011 Issue 2, pp. 223-239.

<https://www.tandfonline.com/doi/full/10.1080/13573322.2011.540427?needAccess=true>

Provision for a School Pool Shallower than 1.2m

Teacher Provision

2 Swim England NCTP Support Teacher of School Swimming*

OR

1 Swim England Teacher of Swimming

OR

1 Swim England: Level 2 Certificate for Teaching Aquatics (ideally with National Rescue Award for Swimming Teachers and Coaches (NRASTC) or National Pool Lifeguard Qualification (NPLQ) **OR**

1 STA: Level 2 Certificate in Swimming Teaching (ideally with NRASTC or NPLQ – see above))

*Swim England Support Teacher of School Swimming qualified staff work with a ratio 3:1 pupils working under the guidance of a Level 2 qualified specialist swimming teacher who is working under Swim England recommended ratios (this ratio will be dependent on Risk Assessment; e.g. competency and confidence as agreed by the Leisure Provider).

School Staff/Volunteer Provision

At least 1 member of School Staff/Volunteer trained in:

EITHER

Swim England: Support Teacher of School Swimming and Water Safety

OR

NRASTC or NPLQ

Lifesaver/Lifeguard Provision

2 NRASTC or NPLQ – (1 of whom can be the Swimming Teacher)

TOTAL PROVISION FOR SCHOOL SWIMMING SESSION

2 Swim England NCTP Support Teacher of School Swimming*

OR

1 Swim England Teacher of Swimming

OR

1 Swim England: Level 2 Certificate for Teaching Aquatics (with NRASTC or NPLQ) **OR**

1 STA: Level 2 Certificate in Swimming Teaching (with NRASTC or NPLQ)

PLUS

2 NRASTC or 2 NPLQ (or 1 of each) – (both of whom can be Swimming Teachers) **PLUS EITHER**

1 Swim England Support Teacher of School Swimming and Water Safety **OR** an additional NRASTC or NPLQ

A TOTAL OF AT LEAST 3 PEOPLE ON POOLSIDE

including 1 Level 2 Swimming Teacher and at least 2 Lifesavers (1 of whom will normally be the Swimming Teacher) plus 1 Swim England: Support Teacher of School Swimming and Water Safety or an additional lifesaver/lifeguard

Swim England Teacher to Pupil Ratio Guidelines

The ratios outlined below are guidelines set by Swim England for Swimming Teachers holding Swim England Level 2 Certificate for Teaching Swimming/Aquatics Qualification.

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 considered, including the competency and experience of the Swimming Teacher, Lifeguard provision (if the Teacher is also taking on the role of the Lifeguard), design of the pool and ability of the pupils.

Ratios of adults to students will be different for each class. A risk assessment to decide an appropriate ratio should consider:

- *numbers of qualified staff*
- *numbers of non-qualified helpers who are on poolside in a supervisory role*
- *student ability*
- *the facility, including water depth, and unprogrammed activities taking place at the same time*
- *student behaviour*
- *students with SEND*

(AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2020 10th Edition p. 192-19, 2.11.187-2.11.201)

The following applies to Level 2 Swim England (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 –

Ability/age/activity	Baseline Learner /Teacher Ratios	Quality Delivery
Non-Swimmers and beginners - young children , normally primary school age, unable to swim 10 metres unaided on back or front.	12:1	8:1
Children under the age of seven - Irrespective of their swimming ability, group size should be restricted.	12:1	8:1

<p>Improving swimmers - Swimmers who can swim at least 10 metres competently and unaided on their back and on their front.</p>	<p>20:1</p>	<p>12:1</p>
<p>Mixed ability groups - Pupils with a range of abilities (from improving to competent) where the least able are working well within their depth. Swimmers techniques, stamina and deep-water experience should be considered. They should not include beginners.</p>	<p>20:1</p>	<p>12:1</p>
<p>Competent swimmers - Those swimmers who can swim at least 25 metres competently and unaided on front and back, and can tread water for two minutes.</p>	<p>20:1</p>	<p>15:1</p>
<p>Swimmers with disabilities - Each situation must be considered individually, as people with disabilities each have specific needs. 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.</p>	<p>8:1 with 1:1 support in the water where required</p>	<p>6:1 with 1:1 support in the water where required</p>

Programmed and Unprogrammed Sessions

Programmed Sessions are defined as:

- Ones with a formal structure,
 - Disciplined,
 - Supervised or Controlled.
- (e.g., Swimming lessons, Coaching, Organised games etc)

ANY unprogrammed (free play) session taking place in a pool deeper than 1m must be overseen by an NPLQ LIFEGUARD however un-programmed school sessions are heavily discouraged due to their unpredictable nature and, if deemed necessary, should follow a thorough Risk Assessment.

Lifeguards and Lifesavers are only permitted to work in a pool where they are qualified to the pool's maximum depth.

Schools using their own Pools

A Health and Safety talk and drill should be run with every class (pupils and teachers) at every pool on the first lesson of each programme and then regularly or when required, to practice an emergency evacuation of the pool and to ensure familiarity with the pool alarm and emergency procedures. If a pupil is absent for the briefing (or new pupil joins the school) they must be given the brief before commencing swimming.

AfPE recommend, *'All lifeguards, lifesavers and supporting staff need to:*

- *Update their skills in lifesaving and Water Safety regularly where relevant to their role*
- *Practice their lifesaving skills and, where appropriate, lifeguarding skills regularly*
- *Remain diligent and effectively organised throughout an aquatic session*
- *Be aware of the standard operating procedures for the pool they are using*
- *Be appropriately dressed in order that they can fulfil the requirements of their role promptly, effectively and without restriction*

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

Conditions of Hire to Outside Organisations

Pool Operators cannot delegate responsibility or accountability, 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 (see **Appendix H1**).

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, including safeguarding of young people and vulnerable adults.

The mechanism for this is initially the agreement to hire and any conditions of hire imposed by the organisation. Hire conditions will be based on provisions made in the NOP and EAP for the pool.

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. 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. A qualified RLSS NRASTC or NPLQ Lifeguard must be present regardless of pool depth.

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 the form should be ideally completed to show all this information as the teacher ratios/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 Teachers and their qualifications; who will provide the lifeguarding; qualifications of lifeguards and the level of lifeguarding 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
- Proof of having undertaken a recent Safeguarding Course will be required except when the pool is being hired for private family use.
- All persons working with children shall have an up-to-date DBS and this needs to be shown with the hire agreement
- Appropriate third-party liability insurance to the value of £10 million public liability insurance
- **Un-programmed sessions** (if permitted) - ratios for should be different to structured swimming lessons. A qualified NPQL Lifeguard **must** be present regardless of pool depth.

The pool's NOP should be referred to as unprogrammed sessions may be prohibited due to their unpredictable nature. 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 old and under in a ratio of no more than 2:1

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

School Pool Management

Pool Managers

The Pool Technical Operating Procedure (PTOP) will specify all the technical issues of the operation of the pool. This will include, but not be restricted to:

- Cleaning protocols
- Chemical dosing procedures and levels
- Backwashing protocols
- Emergency actions for chemical spillages and mixes
- Filtration protocols

It is strongly advised that there are 2 persons qualified to run the pool so there is backup in an emergency and absence.

Persons designated with responsibility for the management of the operation of the pool should be qualified to manage staff involved in operating the pool and should be authorised to control the use of the pool. OCC Health and Safety Team can advise on appropriate courses.

The monitoring of pool plant operation is included in the annual H&S compliance report to the Director of Children's Services. Advice on pool plant operation is available from OCC (see Contacts).

Pool Plant Operation

For school pools

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

Pool Plant Operators

Pool plant operators must attend the City and Guilds WTT007 Swimming Pool and Spa Pool Plant Operators & Carers Training Course or equivalent qualification that meets the PWTAG training. This course lasts for 1 day and must be renewed every 3 years. This course covers what the plant operator needs to know to keep the pool water reasonably free from the risk of infection spreading, to keep the water clear so that pool users can be seen under the water and to operate a simple school pool plant safely and effectively. SMS Environmental - <https://sms-environmental.co.uk/training/>

Monitoring

Schools may contact <https://sms-environmental.co.uk/> or <https://www.thamesvalleywaterservices.co.uk/> to inspect school seasonal pools termly, prior to opening, and hydrotherapy/non-seasonal pools termly (these adhere to NHS/PHE guidelines) (Other contractors exist). Aspects for compliance include training and competence, written safe operating procedures, Risk Assessments, including Cryptosporidium, site safety, signage, chemical safety, flow meter and water testing regime. Where fully compliant with OCC

requirements, the establishment/setting will be given a written Report confirming that the pool can be used. This may include recommendations for action. An unsatisfactory Report may require a second visit to verify improvements before the pool can be used.

To ensure that pools are being operated correctly an agreed water quality monitoring and testing regime should be organised using a competent contractor, for example SMS Environmental or Thames Valley Water Services.

Microbiological testing is carried out at the following frequencies:

1. Non-seasonal pools – every month.
2. Seasonal pools – every month during the operating season, with the first being taken prior to opening.
3. Hydrotherapy pools – weekly testing.

Guidance on Pool Temperatures can be found via the following link: <https://www.pwtag.org.uk/faqs/index.php>

Pool closures

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

The bacteriological samples must be sent away for analysis; the establishment/setting will be informed immediately of unsatisfactory results by telephone or email and of satisfactory results by email.

Following closure for any reason it will be the establishment/setting's responsibility to arrange for remedial measures to be taken, for further testing and analysis of the pool water chemistry, by a competent contractor, to obtain satisfactory results before the pool can be put back into use. The Health & Safety Team (see contacts) must be informed of the results.

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 Pool Operators. Support is available to the Pool Operators from Carlton Associates, SMS Environmental, Thames Valley Water Services or other Pool Maintenance professionals (this service by the PWMC [Pool Water Maintenance Contractor] is one that the school must pay for directly).

In view of the large variety of equipment installed for the filtration and chlorination of swimming pools, these notes are intended for general guidance only. Pool Operators should refer to manufacturer's instructions for the specific information relative to their particular plant or, if in doubt, should contact PWMC.

Pool Operators should ensure that all safety fittings, such as pool steps, handrails, etc. and also diving boards and other equipment, are secure, in good repair and have non-slip surfaces, and

that broken or missing grids to water outlets at the bottom of pools are replaced immediately. Pool surrounds (whatever the surface) 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.

Useful Websites and Further Reading

Association for Physical Education (AfPE). Safe Practice in Physical Education and Sport. 10th edition, 2020.

Swim England. School Swimming and Water Safety Charter. Free to join: resources to assist with the teaching of swimming and water safety in Primary Schools.

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Appendices

Appendix A	Model Risk Assessment for a Public Pool
Appendix B	Model Risk Assessment for Indoor School Pools
Appendix C	Model Risk Assessment for Outdoor School Pools
Appendix D	Model Normal Operating Procedure (NOP)
Appendix E	Model Emergency Action Plan (EAP)
Appendix F	School Swimming Checklist
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Appendix M	Swimming class registers including information on pupils with medical conditions and/additional needs; information for Leisure Providers
Appendix N	Visit Notification Form
Appendix O	Diving