



Ministry
of Defence

DCS Directive 3.2.20

Water Safety for MOD Schools and Settings

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General

Authorisation	Head DCS
Senior Responsible Owner	AH SIS
Point of Contact	Amanda Morning SO1 SHEF
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Related Policy/Guidance	Health and Safety Executive. HSG179: Health and Safety in Swimming Pools (2024) Education Scotland. Scottish Swimming Development Plan 2015-2021. Association for Physical Education (afPE). Safe Practice in Physical Education School Sport and Physical Activity 2013DIN06-019: Safety in Swimming Pools Operated by the Armed Forces. DCS Policy Directive 3.2.11: DCS Schools and Settings Outdoor Learning and Visits DCS SHEF SOPs 001 – 004 Occurrence Reporting
Annex A	Normal Operating Procedures
Annex B	Emergency Action Plan
Annex C	Risk Assessment

Introduction

1. Schools in Great Britain must maintain school level policy that directs statutory curriculum requirements for swimming and water safety. DCS mirrors this requirement overseas where reasonably practicable. The Queen Victoria School (QVS) complies with statutory guidance for Scotland and may use this DCS Policy Directive¹ where it is complementary.

¹ Consideration has been given as to whether this Policy Directive complies with the Public Sector Equality Duty, and it has been concluded that the duty has been complied with.

Principles

2. All Defence managed swimming pools, wherever situated, are required to comply with 2013DIN06-019² which references HSG 179³. It is a Commanding Officer/Commander/Head of Establishment⁴ responsibility to implement this under legal Duty of Care obligations. Likewise, it is a Duty of Care responsibility to manage the risks of all swimming pool activities down to As Low As Reasonably Practicable (ALARP). It is expected that swimming pool operators will therefore be responsible for safety, have sufficient trained staff and hold public liability insurance, or rely on MODs self-indemnification arrangements, i.e. to bear the risk, where the operator is the MOD.
3. Where water-based activities are arranged/delivered by DCS personnel in swimming pools managed by Defence, they must do so in accordance with the policy contained in 2013DIN06-019 and use this DCS Policy Directive as complementary direction.
4. All water-based activities that are arranged/delivered by DCS personnel overseas in swimming pools not managed by Defence (local public swimming pools/private swimming pools/outdoor swimming) are to be conducted in accordance with this DCS Policy Directive and following the principles laid out 2013DIN06-019 and in HSG 179: Health and Safety in Swimming Pools.

Aim

5. This DCS Policy Directive aims to provide direction and guidance that compliments both Defence policy, Statutory guidance (England and Wales) and professional standards for the safe practice of water-based activities required by the regular and/or supporting education curriculum delivered by MOD Schools and Settings overseas.

Scope

6. This DCS Policy Directive applies to all water-based activities arranged/delivered by DCS personnel overseas that are required by the regular or supporting education curriculum (0-18) and includes:
 - a. Swimming required by the physical education curriculum
 - b. Educational visits (inclusive of residential)
 - c. Outdoor learning
7. This DCS Policy Directive only applies to DCS personnel employed in MOD Schools and Settings.
8. QVS follows Scottish National direction and guidance for water safety and this Policy Directive where complimentary.

² [2013DIN06-019: Safety in Swimming pools Operated by the Armed Forces:](#)

³ [HSG 719: Managing Health and Safety in Swimming pools](#)

⁴ Not all Heads of Establishments are COs and not all COs are Heads of Establishment therefore whoever has the responsibility for the swimming pool has the legal Duty of Care obligation to implement "Managing Health and Safety in Swimming pools" ((HSG179)

Responsibilities

9. HQ DCS (MOD Schools) is responsible for:
 - a. Promoting the inclusion and development of swimming in the school curriculum
 - b. Monitoring and supporting the achievement of 25 metres swimming target for pupils by the end of Key Stage 2
 - c. Providing advice to Schools and Settings in locations where there are no suitable swimming facilities
 - d. Ensuring that DCS personnel are appropriately Disclosure and Barring Service (DBS) cleared⁵, trained and skilled in accordance with the duties laid out in this Policy Directive
 - e. Ensuring that MOD Schools and Settings have insurance, with risks either covered by MODs “self-indemnification” arrangements or commercial insurance when engaging in Non-Publicly funded activities, ensuring that the training qualification is recognised by the insurer
10. DCS Head Teachers and Setting Managers are responsible for applying the direction laid out in this Policy Directive, inclusive of compliance with Defence policy, to any arrangement/delivery of water-based activity for children in early years/childcare.
11. MOD Schools and Settings are responsible for:
 - a. supporting the provision of swimming instruction either in Key Stage 1 or Key Stage 2. Specifically, pupils should be taught to:
 - (i) swim competently, confidently and proficiently over a distance of at least 25 metres by the end of Key Stage 2 (KS2)
 - (ii) perform safe self-rescue in different water-based situations
 - b. supporting pupils who do not meet this requirement through ‘top up’ at the end of KS2 or ‘catch up’ on their transfer to secondary school
 - c. publishing details of provision or non-provision in the school prospectus
12. Head Teachers and Setting Managers are responsible for:
 - a. ensuring that the provision for swimming is made within the curriculum
 - b. ensuring that the School or Setting meets the 25 metres swimming target for pupils by the end of Key Stage 2 or later for those who do not meet the target during Key Stages 1 and 2

⁵ See Flowchart of Disclosure and Barring Service P70. [Keeping Children Safe in Education 2024](#)

- c. ensuring that a member of teaching staff is delegated as swimming co-ordinator and is appropriately trained
 - d. ensuring that School or Setting swimming activities are appropriately supervised and safeguarded
 - e. ensuring that all adults working with children are enhanced DBS cleared with children's Barred List check and are suitably qualified and experienced to deliver or support swimming lessons
 - f. where necessary, recruiting a swimming instructor/teacher qualified to Swim England Teacher of School Swimming level
 - g. ensuring that school staff and volunteers are enhanced DBS and Childrens Barred List check cleared and have been trained on and passed Safeguarding Course Level 2
 - h. ensuring all relevant and up to date medical and health information is maintained and provided to swimming instructors
 - i. ensuring that the School or Setting has Public Liability insurance to a minimum limit of liability of £5M, higher limits may be appropriate, for example where vulnerable children are involved, and that the swimming qualification held by the teacher/setting leader is recognised by the insurer (if relevant). Evidence of the Public Liability insurance should be provided in a form satisfactory to MoD and to be obtained prior to any activity. Should the activities be recurring, evidence of insurance should be provided annually
 - j. ensuring that School or Setting swimming policy and procedures are maintained
 - k. ensuring that the Normal Operating Procedures and Emergency Action Plan are reviewed and update appropriately on an annual basis.
13. Swimming co-ordinators are responsible for ensuring that:
- a. all School and Setting staff and volunteers involved with swimming and water-based activities are aware of, and follow DCS and MOD school level policy and procedures
 - b. School and Setting staff and volunteers are appropriately trained or briefed as required by safety and safeguarding
 - c. dynamic risk assessments are undertaken including for volunteers, staff carrying out the activity and children. These should be updated regularly, especially when there is a change in circumstances such as staffing levels, weather conditions if the pool is outside or the number of children
 - d. establishing a system for recording and monitoring children's progress in swimming, including the 25m target at Key Stage 2, and identifying which pupils may need "top up" teaching
14. Teachers in charge and any accompanying School or Setting Staff are responsible for:

- a. overall responsibility for the swimming group
- b. delegating responsibilities appropriately
- c. ensuring that responsibilities are enacted by a designated staff member/s as below:
 - (i) a head count must be taken before, during and after sessions and that this is recorded in the swimming registers
 - (ii) children must be appropriately supervised when changing. Staff/volunteers must balance the need for adult supervision with the rights of children to privacy in this context. Adults must have a full enhanced DBS with a Childrens Barred Lists check and must be in sight and sound of another member of staff when supervising
 - (iii) children are to be under control at all times
 - (iv) the Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) must be enforced and all staff on the poolside must 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
 - (v) recording and maintaining records of the qualifications of those involved in teaching swimming.

School Teachers/Setting Staff are to:

- a. have an overview of the teaching of their children and the conduct of their class
- b. monitor progress of their pupils
- c. be aware of special educational needs and/or disabilities (SEND) or medical conditions of the pupils they teach so that correct measures/precautions can be put in place
- d. accompany their own classes to swimming lessons whenever possible and remain poolside to provide an assisting role to swimming

15. Adults other than teachers (AOTTs), must be enhanced DBS and Childrens Barred List checked. Preferably they should be qualified and experienced. They can:

- a. support and work alongside teachers who retain responsibility
- b. assist in supervising changing when directed to do so, having read and understood the NSPCC guidance on changing rooms^{6 7 8}

⁶For primary pupils only – in line with Swim England guidance

⁷[NSPCC 2024 Briefing Note Safeguarding Considerations for Changing Rooms](#)

⁸[NSPCC: Mobile Phones and Cameras in Changing Rooms and Showers](#)

- c. administer first aid if appropriately trained⁹
- d. supervise unwell children or children who are not swimming

16. The swimming instructor, who must be an England qualified teacher with Qualified Teacher Status (QTS) who has been inducted, must be qualified to teach school swimming. To remain competent as a swimming instructor, the Swimming Teachers Association (STA) Continued Professional Development (CPD) online course must be completed prior to teaching school swimming. The swimming instructor needs to:

- a. work in partnership with the Teacher in Charge and other School or Setting staff accompanying children swimming
- b. ensure a suitable and sufficient risk assessment is undertaken for each group involved in swimming
- c. be aware of medical, behavioural and special needs of the children and risk assess these in the context of the swimming environment
- d. ensure safe conduct of the class whilst children are in water and on the poolside
- e. enable children to have fun in and near water
- f. prepare schemes of work appropriate to the pupils' age and ability and with reference to the National Curriculum requirements
- g. ensure appropriate numbers of fully qualified lifeguards with an enhanced DBS check including a children's Barred List check (as outlined in **Table 1**) are on the poolside. Shallow tank school swimming pools will require at least two members of School or Setting staff and must engage The Royal Life Saving Society (RLSS) for guidance on, and ensure completion of, the most suitable training as this depends on the circumstances e.g. how many children, activity being undertaken.

17. Lifeguards are to be poolside whenever children swim and must:

- a. follow the risk assessments for the swimming pool and poolside
- b. maintain constant observation of the swimming pool and swimming pool users
- c. carry out rescues and initiate emergency action as required
- d. effect a rescue from the bottom of the deepest part of the swimming pool as required
- e. administer first aid
- f. prevent unsafe activities such as horse-play, ducking, or running on poolside

⁹ Health and Safety Executive (HSE) compliant First Aid at Work training.

- g. ensure that the swimming pool is never left unsupervised whilst in use and secure the swimming pool against unauthorised access when not in use
- h. assist in the running of emergency drills
- i. communicate with children and teaching/setting staff to achieve the above

18. Swimming pool Supervisors are responsible for overseeing the use of the swimming pool during swimming activity. They must also confirm that water testing has taken place, and the facility is safe for the activity.

19. Volunteers will undertake a separate Pool Induction, be provided with this Policy Directive and information regarding the learners/class they will be assisting. They will also be permitted to observe a session prior to participating. The swimming instructor (or an experienced adult) will work with the volunteer in the water during their first pool session to ascertain competency, safety and confidence. More training/assistance will be provided for a few weeks specifically to the individual. Positive DBS and barring disclosures will be treated confidentially and will be reviewed by the Head Teacher and Chair of Governors.

20. The Head Teacher or Setting Manager has the authority to not accept the help of volunteers if he or she believes that it is not in the best interest of the children. It is the Local Authorities Guidance that parents or guardians are not asked to supervise groups that contain their own children. This is because it is felt that a parent or guardian may then be placed in a situation of having to choose between saving their own child or another. Volunteers will be expected to sign their induction documentation. The responsibility for the health, welfare and behaviour of the children remains with the swimming instructor/fully qualified staff at all times.

21. Where a teacher, AOTT or swimming instructor is also the sole lifesaver, an additional competent adult must be present at all times. Where the Head Teacher or Setting Manager cannot guarantee that lifeguarding requirements set out in this policy can be met through existing staff, the school must provide additional qualified lifeguards to ensure the safety of the group.

22. Instructors and lifeguards should have whistles and brief swimming pool users on the proper response when the whistle is blown.

Safe Procedures

Position of the Swimming Instructor

23. The swimming instructor should be teaching from the side of the swimming pool where the whole group can be seen and from where feedback can be given on the performance of each pupil in the group.

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

25. There may be some circumstances in which it is appropriate for a teacher or a classroom assistant/Learning Support Assistant (LSA) to be in the water supporting individual

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

26. When an additional person is in the water assisting, they must be aware of the NOP and EAP.

27. The Teacher in Charge of a group must always ensure that they can see all the pupils and never turn their back on a group or position themselves so that pupils are behind them.

28. Care needs to be taken that there are not excessive numbers of adults on the poolside and that all staff accompanying the children swimming are alert and supportive to the swimming instructor.

29. **In an indoor swimming pool.** If there is glare on the swimming pool surface and the bottom of the swimming pool cannot be clearly seen, swimming instructors should ensure that the window letting the light in is obscured and/or reposition themselves so that anything on the bottom of the swimming pool can be seen.

30. **In an outdoor swimming pool.** The swimming instructor/lifeguard should position themselves so that anything on the bottom of the swimming pool can be seen. Accompanying school staff, who are not involved in teaching swimming should be positioned so they are able to support the swimming instructor in the control of children but should not be in the way of those working on poolside. Their position on poolside must be specified in the Normal Operating Procedure (NOP).

Normal Operating Procedure (NOP)

31. All Schools or Settings with their own swimming pool will need to draw up the NOP for their swimming pool. This is to be reviewed annually to ensure currency and relevancy. A model NOP is at **Annex A**.

32. School or Setting staff working in the swimming pool must receive appropriate training on the NOP, this must be recorded, signed by the person delivering the induction and kept on file.

33. The NOP should include the School/Setting Rules which should be displayed and explained to all pupils prior to their first swimming lesson and regularly through the year.

34. The NOP should include direction on diving, the use of goggles and can include direction on suitable attire.

Emergency Action Plan (EAP)

35. An EAP details roles and responsibilities in the event of a foreseeable emergency. All staff must receive an induction course on the EAP, and this must be recorded by the School or Setting. It must also be signed by the person delivering the training and kept on file. A model EAP is at **Annex B**.

36. Schools or Settings with their own swimming pools will need to draw up or review their own risk assessment as a basis for writing the emergency action plan for their swimming pool. Schools or Settings using swimming pools that are externally operated should liaise with the operating authority to draw up an EAP.
37. Notices need to be displayed to advise swimming pool users of the arrangements in the event of an emergency.
38. All School classes or Settings should run practice drills during the first lesson of each term (and then regularly afterwards) in order that both staff and pupils recognise the alarm signal and know how to respond to it.
39. 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 swimming pool is in use. These should be checked at the start of every lesson.
40. Safety equipment such as poles, throwing ropes or throw bags, first aid provision and emergency alarms need to be sufficient in quantity, regularly checked and records kept and an initialled checklist on show by the alarm, this needs to be positioned so as to be readily available when needed without creating additional hazards to swimming pool users.
41. All swimming pools must be equipped with an alarm or alternative backup means of raising an alarm and summoning support in the event of an accident or incident. If the swimming pool has no alarm, there should be a landline phone on poolside which is checked before each lesson. Mobile phones are only appropriate as a back-up and signals must be checked on arrival at poolside prior to the lesson.
42. A cordless landline providing direct contact to emergency services should be available and made known to all staff. Mobile phones should not be used due to the photographing and filming functionality.

Risk Assessment

43. Each swimming pool and each session must be treated as unique for the purpose of assessing and mitigating for risk. The risk assessment forms the basis of every School's NOP and EAP and should follow the Health and Safety Executive (HSE) Five Step Process detailed at **Annex C**.
44. **Defence Managed Swimming Pools.** The School or Setting must provide the swimming instructor with a register, up to date medical information and any other relevant information about the children, one week before swimming takes place.
45. The completed register of children present should be updated and handed to the swimming instructor for them to check before each lesson.
46. Accompanying School or Setting staff are expected to undertake an overview of the risk assessment each time they attend the swimming pool. Staff should take action to control any identified changes such as:
- a. availability and condition of rescue/emergency equipment

- b. the age and ability of the children in each class
- c. the activities they will be undertaking
- d. the qualifications of the people leading and supporting the session
- e. known medical conditions/support needs

47. Swimming pool depths are to be clearly marked on the walls of the swimming pool and teachers/instructors are to explain their significance to pupils.

48. **Public Swimming pools.** Schools and Settings will need to form a judgement on the safety and appropriateness of using public swimming pools. The Teacher in Charge must conduct a risk assessment, arrange additional supervision or cover as required and be familiar with:

- a. The risk assessments for the swimming pool
- b. the NOP
- c. the EAP
- d. conditions of hire/hire agreement
- e. swimming pool Rules (usually found in the NOP and displayed on poolside)
- f. any special requirements or medical conditions of pupils

49. **Private Swimming Pools (hotels, campsite, private homes).** The Teacher in Charge is to conduct a risk assessment; ascertain, where reasonably practicable, the suitability of lifeguarding provision and arrange additional supervision or cover as required. Swimming may only take place when either the swimming pool has its own lifeguard on duty or the MOD School or Setting group is able to provide a suitably qualified and experienced lifeguard.

Open Water Swimming

50. For the purposes of this policy, open water swimming is defined as swimming or paddling, in a pond, river, canal, sea, lake, reservoir, waterfall or wetland.

51. Involving young people in well organised and supervised swimming or paddling in open water can provide opportunities to develop their awareness of water safety, choice of swimming area and safe conduct while swimming. Such opportunities are important because the most effective way to reduce the risk of young people drowning is to teach them to swim, giving them the skills to make sound judgements about playing in and around open water.

52. Open inland water such as rivers, lakes, reservoirs or canals present additional risks to those of a swimming pool. These include human and animal borne biological hazards, vegetation and other under water obstructions, sudden changes in depth and pollution, slippery rocks and surfaces.

53. Swimming in the sea carries additional risks which may include low water temperature, strong winds, undertow and tide. For paddling in the sea (gentle, shallow water with no intention to swim) a thorough risk assessment must be undertaken which includes:

- a. the ratios that are appropriate and determined by the age, ability and need of the children and the experience and qualifications of the staff
- b. the ability to account for all participants at all times
- c. a person qualified in at least emergency first aid and competent to carry out CPR. This person may be included in the staffing ratio or be present as an additional person to carry out this responsibility
- d. a thorough knowledge of conditions in and around the water
- e. an agreed and restricted swimming/paddling area considering: the age of the children, weather and water conditions and safety provision
- f. emergency signals (both visual and audible), the need for a whistle to be carried at all times, First Aid equipment including where it will be situated

54. Risks involved in any use of open water should be carefully assessed and should always be a robustly planned activity. It should never be allowed as an impromptu group activity.

55. Guidance must be sought from the Educational Visits Co-ordinator (EVC) prior to any visit that may include swimming in open water.

56. Open water swimming can only take place where:

- a. the Teacher in Charge has been approved as competent to supervise the session by the Head Teacher or the EVC and holds the Swim England Open Water Swimming Coach Certificate
- b. parents or guardians have provided full consent
- c. swimming activities are robustly planned and organised
- d. supervision is undertaken by a suitably qualified and experienced leader who is appropriately competent in life saving, rescue and resuscitation procedures (who is able to deal with the worst-case scenario in the chosen environment).
- e. additional qualifications for open water are held by the lifeguard/s¹⁰

57. **Managing the Activity.** The Teacher in Charge must:

- a. ascertain for themselves the level of the participants' swimming ability

¹⁰ RLSS Open Water Lifeguard Qualification

- b. ensure the activity is suitable for the group, taking account of special needs or disabilities
- c. look out for warning signs and flags and understand what they mean. Flags will carry different meanings in different locations
- d. clearly designate the limits of the swimming area and brief the group accordingly
- e. adopt and explain signals of distress and recall
- f. carry out regular and frequent head counts
- g. have clear roles within the supervision plan – at least one supervisor should always stay out of the water for better surveillance, even where lifeguards are on duty
- h. take up a best position from which to exercise a constant vigilance
- i. divide supervision between staff who are in the water and looking landward towards the group, and staff who stay on land and watch the group from that vantage point
- j. give the participants their full, undivided attention
- k. be prepared to act immediately when a participant is in difficulties. Be aware that a participant in difficulty may not wave or shout as all their energies may be focussed on trying to keep afloat
- l. follow the advice or directions of an official lifeguard
- m. avoid swimming themselves unless it is to help a person in distress
- n. avoid joining in with the group's water-based games
- o. ensure that participants leave the water if they are at risk of becoming too cold; especially if toes and fingers look blue or feel numb (this could suggest the onset of hypothermia)
- p. be able to account for all group members at all times, including those who are not in the water. Only as many pupils as can be observed and counted are to be allowed in the water at any one time
- q. ensure that pupils never swim alone
- r. ensure that swimmers are aware of other water users
- s. ensure that diving only takes place from designated diving platforms

Diving

58. Diving must only be taught by an appropriately qualified swimming instructor with a diving specific qualification. At no point, must anyone without this qualification be allowed to teach diving.

59. All Schools and Settings must check whether their qualification covers them to deliver diving and refer to AfPE Safe Practice in Physical Education guidance on diving.

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

61. Only shallow entry dives should be permitted. Diving blocks and stages must conform to World Aquatics¹¹ or Swim England regulations.

Goggles

62. Goggles may be worn by children who swim frequently or for long periods of time or whose eyes are susceptible to irritation. Requests to wear goggles should be made by parents or guardians and recorded by the swimming coordinator.

63. The swimming instructor for the group is responsible for determining whether any pupil wearing goggles is using them safely and for a positive purpose. If they are not, then the goggles should be removed. Children may be asked to remove their goggles for certain activities e.g. self-rescue, water polo.

64. Risk management should include ensuring that children know how to put on and take off goggles safely, by slipping them off the head rather than by stretching the retaining band.

65. Goggles must be manufactured and packaged to British Standard BS 5883:1996.

Medical Information

66. All relevant medical conditions are to be documented on each School or Setting's swimming register and risk assessment. Each swimming instructor and accompanying School or Setting staff must be in possession of all medical information one week prior to the child/children swimming, so a suitable and accurate risk assessment can be undertaken.

67. Individual pupil information for specific medical conditions that will include but are not limited to asthma, epilepsy, visual and hearing impairment, must be compiled and returned to the swimming instructor, along with all registers, one week before commencement of the swimming programme.

68. If a child experiences a medical condition during a swimming lesson that was previously unknown to the swimming instructor, and/or School or Setting, this must be documented in writing by the School or Setting designated person. School or Setting staff should discuss the incident with the parent or guardian of the child and ensure permission from them to continue

¹¹ [World Aquatics website](#)

with swimming lessons is renewed. The incident should be discussed between the School or Setting designated person and the swimming instructor so that safe procedures can be put in place before the child participates in the next swimming lesson.

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

First Aid Arrangements

70. All Schools and Settings should make or check the arrangements for First Aid to be available for travel to, from and at the swimming pool.

71. Emergency blankets should be available in a box and clearly labelled, this should reflect the maximum number of people who could occupy the swimming pool. There must be a qualified First Aider, on site at all times when the swimming pool is in use (in swimming pools used by children under eight years old, the First Aider must be qualified in Paediatric First Aid).

72. All accidents/incidents requiring First Aid are to be recorded on AF510¹². Schools or Settings hiring the swimming pool must request a copy of the form for their own records.

73. Accidents and incidents must be reported using SHEF SOPs occurrence reporting¹³.

Teacher Pupil Ratios

74. Teacher/Pupil ratios are to be defined through risk assessment and must be included in the School's NOP. Irrespective of the teacher to pupil ratio, there must always be at least two members of School or Setting staff present on poolside during a swimming lesson.

75. The absolute upper limit for swimming instructor to pupil ratio is 1:20.

76. The safety ratios in **Table 1** are taken from the Swim England and The Water Incident Research Hub¹⁴ Guidelines for Swim England¹⁵ Swimming Teachers and should only be used for guidance when writing risk assessments. The NOP, EAP and other factors need to be considered when defining teacher to pupil ratios, including the competency and experience of the swimming instructor, Lifeguard provision (if the instructor is also taking on the role of the Lifeguard), design of the swimming pool and ability of the pupils.

Non-swimmers and beginners 1:12
Non-swimmers and beginners (Learners with or without floatation aids that cannot swim 10m comfortably).

¹² [AF510 SOP](#)

¹³ [Occurrence Reporting and Investigations SOP](#)
[Occurrence Investigations SOP](#)

[AF510A Completion SOP](#)

¹⁴ [Water Incident Research Hub](#)

¹⁵ [Support Teachers and Teacher of School Swimming Qualification](#)

Children under the age of 7 1:12
Irrespective of their swimming ability, group size should be restricted.
Improving swimmers 1:20
Learners who have mastered stroke technique and have the ability to swim 10m comfortably and safely.
Mixed ability groups 1:20
Mixed ability groups (not including beginners) all should be able to swim 25m minimum. Mixed ability groups are often a necessity in managing School or Setting groups.
Competent swimmers or teaching synchronised swimming 1:20
Competent swimmers (those who can swim at least 25 metres competently and unaided and can tread water for 2 minutes).
Competitive swimmers 1:30
Training only with very competent swimmers.
Swimmers with special educational needs and disabilities (SEND) 11 upwards
Swimmers with special educational needs and disabilities (SEND). Each situation must be considered independently as people with disabilities are not a homogenous group.
Diving Training 1:10 Teaching diving drills on the pool side 1:20

Table 1.

77. Where Schools or Settings take more than twenty pupils swimming, they will require two Swim England 'Teacher of School Swimming' Qualified School Swimming Instructors (or equivalent) and two Support Teachers qualified in Swim England 'Support Teacher of School Swimming'¹⁶ (or equivalent) School or Setting staff.

Qualifications

78. **The Swimming Instructor.** The minimum recommended qualification for the teaching of swimming is the Swim England Teacher of School Swimming qualification or STA equivalent.

79. **Class Teacher/AOTT.** The minimum recommended qualification for a class teacher or AOTT is the Swim England Support Teacher qualification.

¹⁶ Swim England School Swimming Teacher Qualifications

80. **Lifeguard.** The minimum recommended qualification for lifeguarding a programmed activity is the RLSS National Rescue Award for Swimming Teachers and Coaches (NRASTC)¹⁷. Programmed activity is defined as:

- a. within a formal structure
- b. disciplined
- c. supervised or controlled
- d. continuously monitored from poolside

81. For un-programmed activities (such as free swimming) the minimum recommended qualification for lifeguarding is the National Swimming pool Lifeguarding (NPLQ).

82. Where a swimming pool is in shared use and divided between programmed and un-programmed activities, suitably qualified and experienced teachers or AOTTs may take responsibility for lifeguarding and instruction within the programmed area of the swimming pool only.

Swimmers with Disabilities

83. Policies, procedures and/or physical changes to the environment may need to be put into place to ensure children with disabilities are able to learn to swim,¹⁸ however, there remains the caveat that justifiable actions for the protection of an individual's life or health and safety override the duty to include. Schools and Settings may have to consider the following:

- a. Swimming pool accessibility (i.e. ramps, hoists and changing facilities)
- b. Increased Teacher to Pupil ratio
- c. Assistant/helper in the water

Child Protection

84. Swimming is assessed as a high-risk activity in respect of the protection of children from abuse because of the opportunity for close physical contact and the nature of swim wear.

85. For this reason, special attention must be given to rules and procedures to avoid abuse and the allegation of abuse. All persons working with children shall have an enhanced DBS and Childrens Barred List Check and this should be shown with the hire agreement if these are not School or Setting staff.

86. It is important that the swimming pool procedures relate to those defined in JSP 834, Safeguarding of Children and Young People.

¹⁷ [NRASTC website](#)

¹⁸ Equality Act 2010

87. A School or Setting using a swimming pool other than their own, should establish a protocol identifying the relationship between their respective procedures.

88. When supervising children changing or assisting them with their swimming, swimming pool and School or Setting staff and AOTT 's should avoid physical contact with children unless it is:

- a. essential to develop a swimming skill or technique
- b. to treat an injury
- c. to prevent an injury
- d. to meet the requirement of the activity (e.g. Lifesaving)
- e. to lift or manually support a child with disabilities
- f. to assist with a personal care task which the child or young person cannot undertake by themselves

89. 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.

90. If there are children with 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.

91. Always explain to the pupil that you are now going to hold them and explain why to avoid embarrassment. Swimming instructors must never support pupils in such a way that the spectators cannot see their hands.

92. Never support a pupil by handling the swimmer's torso. Only support swimmers by holding their hands, head or feet.

93. Teachers and instructors should never teach or coach a swimmer alone.

94. Where children sustain an injury and any first aid is administered, the parents or guardians must be informed as soon as possible. Details should be recorded and retained by the School or Setting. All accidents and incidents must be reported using AF510.

95. In the event of a child needing to be taken to hospital, a representative from the School or Setting, known to the child, should always accompany them. If this leaves the School or Setting group short of staff at the swimming pool, then the School or Setting should be informed so they can seek additional staffing for the group. 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 people around and that they are in public view.

96. Parents or guardians must be informed of changing arrangements. It is the responsibility of the accompanying School or Setting staff to provide appropriate supervision while the children are changing. Only staff of the appropriate gender should enter the changing room, where possible, except in an emergency. A mixed gender group may use an

open plan, single sex changing area if the children are under the age of seven and with agreement from the swimming pool management. There should never be a situation where a member of staff is alone with a child. All the children should remain together in a group. In situations where this is not possible, two members of staff should remain together. 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.

Records

97. **Incidents and Accidents.** Records of incidents and accidents that occur in the swimming pool or swimming pool area must be maintained and be available for inspection if required. Records pertaining to the safeguarding, welfare or serious incidents must be logged on My Concern and then progressed through the My Concern process. An annual review of these records will assist with the review of the risks associated with School/Setting swimming.

Insurance

98. **Curricula Swimming.** The MOD does not normally purchase insurance and will only accept liability for risks associated with the delivery of its core business. Therefore, only swimming activity that is delivered in accordance with policy laid out in 2013DIN06-019 and as part of a School or Setting's core curriculum (inclusive of the physical education curriculum) will fall under the MOD's liability.

99. Where MOD Schools and Settings are hiring facilities for curriculum swimming they are to assure themselves that the facilities have Public Liability insurance to a minimum indemnity limit of £5M per occurrence and be unlimited as to the total number of occurrences in any one policy year. Where this is not in place, Schools and Settings must arrange appropriate insurance cover.

100. **Non-curricula Swimming.** Schools and Settings are advised that non-curricula swimming activity is not covered by MOD normal 'self-indemnification' arrangements. Where such activities are funded by private individuals, the cost of insurance will need to be borne by the individual.

101. Non-curricula swimming should not be funded (wholly or in part) by MOD Schools or Settings. In scenarios where Schools or Settings arrange non-curricula swimming, they are to assure themselves that the facilities being used are covered by Public Liability insurance.

102. Claims will not be met for loss or damage to pupils' personal possessions.

Risk Assessments

103. Each swimming pool and each swimming session must be treated as unique in order to ensure safe practice in School or Setting swimming. A risk assessment must be completed for each swimming session to identify hazards that could cause harm and to whom. It also ensures the evaluating and mitigating of these risks. Any significant or serious risks to health and safety must be eliminated or reduced to ALARP.

104. Swimming sessions may take place under different swimming pool management arrangements e.g. a School or Setting may have its own swimming pool managed by a DIO contractor or held at a public or garrison station swimming pool. In all circumstances, all parties must be clear about their responsibilities for ensuring the provision of safe swimming sessions including safe infrastructure maintenance, operation/maintenance of electrical/mechanical systems, water treatment and supervision of swimmers.

105. All health and safety risk factors must be assessed and adequately mitigated by the relevant organisation/person. Where there is shared responsibility, there must be cooperation and coordination between the persons/organisations who share them. The national HSE five-step approach to risk assessment is set out in **Annex C** and must be followed prior to each lesson.

Typical inclusions to a Normal Operating Procedure (NOP)¹⁹

<p>Plan of the swimming pool including: Building Plan</p> <p>Dimensions and depths</p> <p>Features and equipment (includes safety check of equipment such as ramps, hoists and changing facilities)</p> <p>Entries and the emergency exit routes</p> <p>Swimming pool alarms and fire alarms</p> <p>Maximum bather capacity</p> <p>Swimming pool address</p> <p>Name of responsible person and their telephone number</p>	<p>Rules of supervision to include:</p> <p>Ratios of staff to pupils</p> <p>Qualifications staff require</p> <p>Arrangements for lifeguarding</p> <p>Training arrangements and frequency</p> <p>What to observe in the swimming pool?</p> <p>Where to be positioned (i.e. in or out of water)</p> <p>Supervision and checks of volunteers</p>
<p>Detailed work instructions to include:</p> <p>Swimming pool cleaning</p> <p>Swimming pool plant operations</p> <p>Swimming pool testing</p> <p>Chemical safety</p> <p>How to use equipment</p>	<p>Lifeguards Duties and Responsibilities:</p> <p>Requirements for equipment</p> <p>Lifeguard training</p> <p>Numbers of lifeguards for activities</p>
<p>Potential Risks:</p> <p><i>List the key hazards to alert users to things they need to be aware and the hazards to be avoided.</i></p>	<p>First Aid supplies and training to include:</p> <p>Equipment provided by the School or Setting and its location</p>

¹⁹ Please note that this is a model NOP that may be adapted for use. Swimming pools on the Defence Estate will have their own NOP.

	<p>Arrangements for checking contents and replenishing stock</p> <p>Named First Aiders and training they have received</p> <p>Disposal of sharps</p> <p>Dealing with blood and vomit spillages</p> <p>Reporting and recording of incidents and accidents</p>
<p>Details of alarm systems and other emergency equipment:</p> <p>All alarm systems and emergency equipment provided</p> <p>Location and operation</p> <p>Action to be taken on hearing the alarm</p> <p>Testing arrangements and maintenance</p> <p>Back up if alarm fails</p>	<p>Systems of work:</p> <p>Lines of supervision</p> <p>Call out procedures</p> <p>Lifeguard rota times</p> <p>Conditions of hire (which will include the duties and responsibilities of each party, and arrangements for safety during hirer's use.)</p>
<p>Operational System:</p> <p>Controlling access to a swimming pool or swimming pools intended to be of use</p> <p>The safe use of swimming pool covers</p>	

Emergency Action Plan (EAP)

Emergency Action Plans typically outline roles and responsibilities, including for the following situations:

Overcrowding (through exceeding bather capacity or areas of overcrowding)	Lack of water clarity and water contamination
Assault	Serious injury to swimmer
Fire	Lock downs
Structural failure	Emergency evacuations due to:
Failure of or insufficient lighting	Toxic-gas emissions
Dealing with casualties in the water	Bomb threats
Disorderly behaviour	Power failure

The procedure should explain:

How to clear the swimming pool and/or evacuate the building/swimming pool area	How to call for help and what help to give the people involved
That the whistle drill / alarm needs to be clear about the nature of the emergency e.g. swimming pool based, or site based, and if it is an incident in a public area	The roles and responsibilities of all staff and volunteers

Model Emergency Action Plan

The **Risk Assessment** is to be signed by a senior member of the School or Setting Management Team and/or Governors, and must be reviewed, signed and dated on an annual basis.

The **Normal Operating Procedure** and **Emergency Action Plans** are compiled from the findings of the **Risk Assessment**, and there may be alterations that need to be made to meet individual Schools or Settings operations.

Once set and agreed, the **NOP** and **EAP** must be made available to those who may operate or manage the swimming pool and its use, and their understanding of its use be tested, using the assessment template below:

	Assessor and Date	Approval and Date	Adopted as School Policy and Date
EAP			
NOP			
Review #1			
Review #2			
Review #3			
Review #4			

Objective and Scope of Model Emergency Action Plan

1. The Emergency Action Plan details the specific actions to be taken in the event of any foreseeable emergency occurring.
2. Staff and those responsible for groups using the swimming pool under a hire agreement must all be aware of the procedures to be used and must be trained to work in accordance with the provisions included in the emergency action plan. *(The emergency action plan may need adapting to the circumstances in which the hirers use the swimming pool.)*
3. The swimming pool Operator has a duty to check compliance with the requirement and to regularly review the provisions made.

The plan must include the following possible emergencies:	
Serious injury to a swimmer	Toxic emissions
Discovery of a casualty in the water	Chemical spillage
Adverse weather, thunder and lightning in an outdoor swimming pool	Outbreak of fire or building evacuation
Overcrowding	Civil emergency
Disorderly behaviour	Structural failure
Swimming pool water treatment	Lighting failure
	Dealing with gross contamination

4. The plan must consider the individual characteristics of the swimming pool and the building, any specific hazards, the number of available staff and their training, the extent and location of First Aid facilities and the type and location of other emergency equipment.
5. An emergency is defined as a dangerous situation that occurs with little or no warning and requires a swift and immediate response to avert the present danger or lessen the effect.
6. If handled properly a minor emergency can be contained and should not become life threatening. Poor handling of a minor incident can escalate and become a major emergency with a risk of serious injury or death.
7. Training and practice in these plans and procedures should take place regularly and with sufficient frequency to ensure an immediate and automatic reaction to an emergency.

Internal Reference Documents:	External Reference Documents:
Plans of the building	HS(G) 179 Managing Health and Safety in Swimming pools
Lifeguard Training Schedule	
Swimming pools - Conditions of Swimming pool Hire	PAS 65 Management of Swimming pools – General Management Code of Practice

PAS65 – Management of Swimming pools Staff Daily Rota	Pool Water Treatment Advisory Group (PWTAG) Swimming Pool Water: Treatment and Quality Standards for Swimming pools and Spas
General Management - Code of Practice	
Staff Signing in Book	Safe Practice: in Physical Education, School Sport And Physical Activity 2024 afPE
Swimming pool Training Log/Attendance Register	
Individual Lifeguard Training Record	Royal Life Saving Society UK National Pool Lifeguard Qualification edition 10
Safe Practice in School Swimming	Swimming pool Plant Operators Certificate Small Swimming pool Plant Operator Certificate

8. The Teacher, or other person, in Charge of Swimming, should ensure that:

- all staff are adequately trained in the procedures detailed hereafter
- notices are displayed to advise the general public of the arrangements
- exit door, signs, alarms, fire-fighting equipment and break glass call points are regularly checked and kept free from obstruction
- all exit doors operate without the aid of a key whenever the premises are occupied
- a named person/position will be responsible to take charge in the event of an emergency
- a named person/position will be responsible to summon the emergency services in the event of an emergency. In a public swimming pool this is likely to be the swimming pool staff

9. In a School or Setting swimming pool, the Teacher or other person, in Charge of Swimming must ensure that when the swimming pool is let to an external user the method of summoning the emergency services is at least as adequate as the School or Setting system, e.g. when the School or Setting office is locked and not manned.

10. In the Event of Serious Injury to a Bather

The Teacher or other person in Charge of Swimming should:

- Call for the assistance of another lifeguard or School or Setting staff member either by operating the swimming pool alarm system, using a two-way radio, or blowing three blasts on a whistle.

- Carry out appropriate first aid. In cases of serious injury, broken bones or unconsciousness the patient should not be moved until first aid has been given. Bleeding should be stopped by applying a wound dressing or, if necessary, by the direct application of pressure on an artery.
- All head injuries should be treated as serious. Call an ambulance and carry out first aid if necessary, with the patient upright to reduce the flow of blood to the injury. Under no circumstances should the casualty be permitted to return to the swimming pool even if they appear well, as delayed concussion is a real possibility which can lead to the loss of consciousness in the swimming pool.

11. Other staff/volunteers will support casualties by speaking to them confidently and reassuringly.

12. All accidents to staff, pupils and hirers must be reported to the designated individual/s

13. Accidents, Incidents and dangerous occurrences must be reported on the latest version of the Army 510 Form to the Army Reporting Cell (ARC) and copied to the relevant SHE Advisor/s i.e. DCS SHE Advisor and host station SHE Advisor if relevant. The ARC will make a judgement as to whether the HSE are to be informed. In the case of a serious incident e.g. fatality, the ARC should be notified immediately by telephone before sending them the Army 510 form²⁰.

Discovery of a Casualty in the Water

14. On discovering a casualty in the water, activate the swimming pool alarm.

15. As soon as the alarm is activated, support staff are to implement the EAP. This needs to be a detailed plan ensuring roles and responsibilities are clear, for example who will establish the nature of the emergency, call an ambulance and meet it when it arrives.

16. Enter the water in a safe manner and land the casualty at the most suitable point. Where the swimming pool is an above ground construction, the casualty will need to be handed from the swimming pool to someone standing on dry land; (this procedure needs practice and forms part of the training for lifeguards). If a spinal cord injury is suspected, the casualty should be supported in the water and a vice grip turn performed and the procedure in the EAP should be followed.

17. If breathing has ceased, commence Expired Air Resuscitation (EAR) immediately while in the water and while towing them to the side. Land the casualty and continue with EAR. The person in charge must arrange for an ambulance to be called.

18. If the heart has stopped beating, commence CPR. Continue CPR and EAR until the casualty restarts breathing and a pulse is found, or until the ambulance staff take over. Patients who have been resuscitated should be treated for shock until the ambulance arrives.

²⁰ Contact details for the ARC are at this [link](#). For further information see the MOD's Health and Safety Policies and Procedures Section JSP 375 Part 2, Volume 1 Chapter 16: Accident, Incident and Near Miss Reporting and Investigation.

19. Other swimming pool staff must not let the level of swimming pool supervision drop below a safe level by watching the incident and may be required to cover for absent colleagues. If necessary to ensure safety, the swimming pool should be cleared.

20. Staff should ensure that a crowd does not gather around the casualty.

21. Designate a member of staff to meet the ambulance from the main road to take them to the scene of the incident as speedily as possible, using the emergency exit doors adjacent to the location of the incident.

22. As soon as possible after the incident, all staff involved will be required to make a written statement.

23. No statements shall be made to the press or other members of the public.

Adverse Weather Conditions [Outdoor Swimming pools]

24. If bad weather occurs and the natural lighting is so poor that the bottom of the swimming pool cannot be seen, it should be evacuated immediately, and all swimming ceased.

25. In the event of a thunderstorm, evacuate the swimming pool immediately and suspend swimming sessions.

Water Treatment and/or Condition

26. Water treatment chemicals will be introduced into the swimming pool, in accordance with the manufacturers' instructions, and as supported by the recognised training given to swimming pool operators.

27. If the water becomes cloudy, alert the person responsible for swimming pool maintenance to undertake a water test and apply remedial action to correct the water quality.

28. If the water clarity has become so poor that a brick can no longer be seen on the bottom of the swimming pool, then it will need to be closed and usage suspended until remedial action has taken place and water clarity is restored.

Dealing with Gross Contamination:

Blood and Vomit

29. In the event of a major spillage of blood in the swimming pool, the swimming pool will be evacuated while the blood disperses via the normal swimming pool water circulation system. This can take up to several hours, therefore the swimming pool will be closed for the remainder of the day.

30. Chemical level tests will be taken prior to reopening to confirm that disinfectant residuals and pH values are within the recommended ranges.

31. Any blood spillage on the poolside will be covered with paper towels, gently flooded with a strong disinfectant solution and left for at least two minutes before it is cleared away, by

placing the contaminated towels into an approved medical waste unit or incinerated. The affected area can then be washed with water and detergent and, if possible, left to dry. The person clearing up the spillage will need to wear gloves and goggles.

32. Any blood spillage on the poolside will not be washed into the swimming pool or poolside drains but will be wiped up with absorbent material placed into a polythene bag and disposed of in the waste.

Faecal Contamination:

33. If the release is solid, then it will be dealt with by:

- completely removing and properly disposing of the release
- ensuring that the equipment is properly disinfected after use
- ensuring the incident is recorded

34. If the release is runny or loose (diarrhoea), the following process will be used:

- In the event of faecal contamination in the swimming pool, it will be evacuated for at least six turnover periods or a minimum of 24 hrs.
- The Free Chlorine level will be raised to its operating maximum concentration
- A coagulant will be introduced into the system. Swimming pools that are fitted with Hi-Rate filters can use an Aluminium Sulphate tablet, by placing it in the skimmer unit/strainer basket whilst the swimming pool is closed for use.
- The swimming pool floor will be swept/vacuumed to remove any solid material and collect, by use of a scoop, any floating large solids.
- The filter will be backwashed prior to re-use, and the swimming pool water level will be topped up, as appropriate.
- The filter media will be allowed to settle, by running water to drain for a few minutes after the backwash process is complete.
- The swimming pool will be allowed to circulate for eight hours, to remove any with-held oocysts, through any imperfections in the backwash process.
- The swimming pool water will be re-tested and, if the results are satisfactory the swimming pool will be re-opened.

Toxic Emissions

35. Should any chemicals be inadvertently mixed, or otherwise come into contact with each other, the swimming pool area, and the School or Setting, will exercise its Emergency Evacuation Procedure. On arrival, the Emergency Services will direct the School or Setting, and undertake any further actions, or remove to alternative evacuation points.

Chemical Spillages ²¹

36. The School/Setting provides an approved Chemical Spillage Kit, and this is kept in (*insert location/area*) which is the principal location (storage or use) of the chemicals used in the treatment of swimming pool water.

37. All operators who may be required to handle chemicals, in any way, are aware of the location of the Spillage Kit, and of its operation.

38. Operators, and those required to deal with a chemical spillage will comply with the PWTAG Code of Practice 21.²²

39. Fire Evacuation

The arrangements in place to raise the alarm are as follows:

The fire alarm is activated by.....

Break glasses are located.....

The alarm sounds like.....

(On hearing the alarm who does what to initiate an evacuation).

40. A plan of the building is inserted and shows the location of fire exits, firefighting equipment and the assembly point.

41. Once the alarm has been raised those on poolside should blow their whistles loudly and clearly to clear the swimming pool as quickly as possible.

42. The person responsible for the swimming pool (*insert job title or name*) should be notified by the person raising the alarm as to the location and nature of the fire. This person will then liaise with lifeguards / staff and co-ordinate the evacuation process.

(This needs detailing for individual buildings and for the full range of potential types of use of the swimming pool stating exactly who does what.)

43. In the event of an evacuation the emergency services should be called. The person making the call should ask for the Fire/Ambulance Service (as required) and tell them the name of the School or Setting, the address of the swimming pool, the location of the swimming pool on the site, and the location of the fire giving as much information as possible.

44. Every person will be directed to the nearest emergency door, away from the source of the fire and to the assembly point at..... (*Insert location*).

45. Children are instructed to bring towels onto the poolside, to be used in the event of an emergency evacuation, as they are unable to return to the changing area, prior to leaving the area. Thermal blankets will be issued and will be brought to the assembly point by (*insert job title/name*)

²¹ [Swim England Guidance on Chemical Storage and Handling](#)

²² Section 12.5 p55 [PWTAG Code of Practice 2021](#)

46. Once at the assembly point the person responsible for the swimming pool will check that all staff are present against the signing-in book or class register and people in charge of groups using the swimming pool will check that all their group members are present and correct.

Civil Emergency

47. Should a telephone message be received that a bomb is in the building, staff are to follow local procedures.

Structural Failure

48. Should a structural failure occur, or if danger is suspected from the building structure, the fire alarm should be activated by breaking the nearest 'break glass' panel. Alternatively inform the person in charge of the swimming pool via a two-way radio. An evacuation is to be initiated.

49. Evacuate from the building using whichever exit doors are unobstructed by the result of the structural failure.

50. If the changing area lies within the structural failure area, children should be taken to a place that is secure and warm.

51. When all emergency actions to protect life and deal with any casualties are over, the incident must be reported to the Army Reporting Cell (ARC) who may forward report it to the HSE as a dangerous occurrence. Relevant SHE advisors must also be copied on the report.

Lighting Failure

52. Should the lights fail; the emergency lighting will come on automatically. Notify the person in charge of the swimming pool in case they are unaware of the lighting failure. (*In the plan, state who does this and how this is to be done.*)

53. Swimming pool and/or teaching staff should ensure that the swimming pools are cleared immediately, and pupils asked to wait on the poolside away from the swimming pool edges until further information concerning the situation is available. Further admissions will be stopped.

54. Should the person in charge of the swimming pool deem the emergency lighting to be inadequate then the swimming pools will be cleared.

55. If the lighting failure is prolonged pupils should be organised into groups and led into the changing rooms by a teacher to change. Some method of supplementary light (torches etc) may be required. (*Details of where these are kept and who issues them should be included here.*)

56. The controlled method of changing will alter depending on the availability of natural light and emergency lighting. Directions will be given by the person in charge of the swimming pool.

Risk Assessments

Introduction

1. Each swimming pool and each swimming session must be treated as unique in order to ensure safe practice in School or Setting swimming. A risk assessment is to identify hazards that could cause harm, establishing who might be harmed and evaluating and mitigating these risks. Any significant or serious risks to health and safety must be eliminated if it is possible, but it is also recognised that some risk will remain with the level reduced to ALARP.
2. For DCS Schools and Settings, swimming sessions could come under any one of the different types of swimming pool management arrangements e.g. a School or Setting may have its own swimming pool that is looked after by a DIO prime contractor or for another School or Setting. All its swimming sessions could be held at a public or garrison station swimming pool facility. In all such cases, it is very important that every party involved is clear about what are their responsibilities in ensuring the provision of safe swimming sessions for Schools and Settings e.g. safe infrastructure maintenance, operation/maintenance of electrical/mechanical systems, water treatment and supervision of swimmers.
3. All the health and safety risk factors in these different functions must be assessed and adequately mitigated by the relevant organisation/person. Where there are areas of shared responsibility, there must be cooperation and coordination between the persons/organisations who share those responsibilities. The HSE are the delegated regulatory authority for health and safety in the United Kingdom and their five-step approach to risk assessment will be used in the guidance given in this Annex.

Step 1: Identify the Hazards

4. It is very important that all types of hazards are considered, including in the swimming pool, its premises and how it is managed by the operator/s. For these hazards, the swimming Pool Safety Operating Procedures (PSOP) NOP & EAP is to be consulted.
5. Any hazards related to the swimming activities and any individual or personal factors of those involved in the activities must also be considered. For a typical swimming session, a wide range of hazards must be considered.
 - Physical hazards e.g. slips, trips, falls, diving/jumping into the water, collisions,
 - Chemical hazards e.g. excess chlorine in the water causing breathing problems/eye irritation
 - Human factors e.g. inappropriate behaviour and bio-hazards e.g. release of faeces/body fluids into the water.

Consideration must be given to the specific situations and an examination of any accident/incident, near miss reports or ill health records related to previous swimming pool/swimming activities may highlight hazards that need to be considered.

Step 2: Harm

6. For every identified hazard consult any group of people who might be harmed. e.g. swimming pool employees, teachers/swimming instructors, students/pupils This will assist in identifying additional controls.

Step 3: Evaluate the risks

7. The level of a risk is a combination of how likely it is that a person suffers injury or ill health by interacting with a hazard and the severity of the resulting injuries or ill health condition. Having evaluated all the identified risks, they should be prioritised in order of severity. Consider whether any can be eliminated, if not the risk should be reduced to ALARP. Risk assessments must be proportionate to the level of risk in terms of the financial cost, time and effort to reduce it. Consider the controls in place already as these may be sufficient. If more action is required to reduce to the risk to ALARP it must be entered onto an action plan with suitable implementation deadlines noting who is responsible for them.

Step 4: Record your significant findings

8. It is good practice to recording the findings of your risks assessments, and you must record them if you have more than five employees. The records must emphasise the risk controls that you have or are being implemented to make your swimming pool swimming sessions safe, as all who are involved need to know what you have in place to keep them safe and what they must do to comply with your safety procedures.

Step 5: Regularly review your risk assessment²³

9. All extant and on-going risk assessments must be reviewed at least annually. For on-going frequent swimming sessions and/or events, assessments must be regularly reviewed to assess their relevance and effectiveness. Any lessons learned must be recorded and reviewed regularly from accidents/incidents and near misses. Additionally, the following occasions must trigger a review of risk assessments:

- If there are any significant changes to your swimming sessions/events that could introduce new hazards.
- If anyone has good reason to doubt the suitability of the risk assessment or identifies how it can be improved.
- If anyone (e.g. life guard, teacher/instructor, pupil/student) has spotted a problem that needs to be addressed.

²³ [JSP 375 Safety Risk assessment and Safe Systems of Work](#)
[HSE 179 Health and Safety in Swimming Pools](#)
[HSE INDG 163 Managing Risk and Risk Assessment at Work](#)