**Appendix A**

**BUCKINGHAMSHIRE COUNCIL - SCHOOL SWIMMING**

**MANAGEMENT OF HEALTH AND SAFETY AT WORK REGULATIONS 1999**

**MODEL RISK ASSESSMENT - SCHOOL SWIMMING - VISIT TO A PUBLIC POOL**

The **Risk Assessment** is to be signed by a senior member of the School 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 a **Risk Assessment**, and therefore, there may be alterations that need to be made to meet individual schools’ operations.

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

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|  | **Assessor and Date** | **Approval and Date** | **Adopted as School Policy and Date** |
| **Initial Risk Assessment:** |  |  |  |
| **NOP/EAP:** |  |  |  |
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| **Review #1** |  |  |  |
| **Review #2** |  |  |  |
| **Review #3** |  |  |  |
| **Review #4** |  |  |  |
| **Review #5** |  |  |  |

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| **HAZARD FACTOR**  **What hazards exist to health and/or safety?**  **(Severity)**  The severity/type of the injury that is likely to be sustained:   1. Negligible injury 2. Minor injury 3. Major injury 4. Fatality 5. Multiple fatalities | **PROBABILITY FACTOR**  **What risks do they pose to employees and other persons?**  **(Likelihood)**  The likelihood and/or frequency that an accident will occur.   1. Remote possibility 2. Unlikely 3. Possible 4. Very likely 5. Certainty | RISK FACTOR  The product of the Severity Rating and the Likelihood Rating gives a Risk Factor score out of 25. The higher the score, the greater the priority for action.  **Hazard Factor X Probability Factor = RISK FACTOR** |

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| Likelihood v |  |  |  |  |  |
| 5 | 5 | 10 | 15 | 20 | 25 |
| 4 | 4 | 8 | 12 | 16 | 20 |
| 3 | 3 | 6 | 9 | 12 | 15 |
| 2 | 2 | 4 | 6 | 8 | 10 |
| 1 | 1 | 2 | 3 | 4 | 5 |
| Severity > | 1 | 2 | 3 | 4 | 5 |

The pool risk assessment checklist is based on the guidance on the Health and Safety Executive Book. Managing Health and Safety in Pools HS (G) 179.

A suggested Hazard score is included in brackets at the end of the hazard. Numbers over 7 need urgent action to eliminate the risk.

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| **HAZARD** | **HAZARD FACTOR**  **[1 – 5]** | **PROBABILITY FACTOR**  **[1 – 5]** | **RISK FACTOR**  **[1 – 25]** | **MEASURES THAT SHOULD BE IN PLACE TO REDUCE THE RISK FACTOR** | **ARE ADDITIONAL**  **MEASURES NECESSARY**  **(if yes, please specify)** |
| **PAGES 3 – 6 COVER ALL ASPECTS WHICH ARE MATTERS FOR THE POOL OPERATOR. HOWEVER, SCHOOLS COULD USE POINTS MENTIONED IN THESE PAGES TO ESTABLISH WITH LEISURE PROVIDER ON INITIAL VISIT THAT THE POOL THAT THEY ARE PROPOSING TO VISIT IS IN FACT FIT FOR PURPOSE:** | | | | | |
| **PHYSICAL STRUCTURE:** |  |  |  |  |  |
| **POOL SURROUND AND BATHER CIRCULATION:** |  |  |  |  |  |
| Are there any structural or design conditions that could become hazardous? |  |  |  | - Where access to the pool hall or pool area is located close to deep water (deeper than 1.2 metres) a barrier is in place to minimise the risk of non-swimmers falling or jumping into deep water?  - The ceiling is in sound condition, with no loose material?  - Safety signs are in appropriate positions and unobstructed, where there are any sudden changes in depth and it is necessary to clearly mark the depth of water, especially at shallow and deep ends; it is necessary to show areas where it is unsafe to swim, or to dive (and indicating any sudden changes in depth which could pose a hazard)  “Danger Deep Water” signs complying with the Safety Signs and Signals Regulations displayed on the pool hall walls. |  |
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| Is there adequate lighting? |  |  |  | -There is an adequate mix of natural and artificial lighting.  - The pool surface is free of glare from either natural or artificial lighting.  - All lighting units are appropriate for use in a pool area, and are adequately protected against moisture.  - Automatic emergency lighting, powered by an independent source, should be provided where sudden loss of light would create a risk, for example during a power failure, so that emergency evacuation procedures can be carried out safely. |  |
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| Are bathers exposed to any hazards in the pool hall? |  |  |  | - The pool hall walls adjacent to wet circulation areas up to 2 m above the floor are in sound condition and free of sharp or abrasive areas.  - Any pool equipment which might cause injury to bathers is stored safely at all times, e.g. if steps are removed from the pool, ensure these are not a tripping hazard. |  |
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| Is there any possibility of scalds or burns to bathers? |  |  |  | - Any low level radiators or heating pipes below 2m around the perimeter of the pool which could cause burns or scalds are protected. |  |
| Are there any trip hazards? |  |  |  | - The pool surround is of adequate width and unobstructed.  - Any steps in the pool hall (indoor pools), are clearly defined and in sound condition.  - Any flights of steps in the pool hall are provided with appropriate handrails.  - Any ramps in the pool hall do not have a gradient of less than 1 in 15. |  |
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| **POOL SIGNAGE** | | | | | |
|  |  |  |  | - The exit from the pool hall is clearly signed with an approved sign.  - The fire exit(s) from the pool hall are clearly signed, with approved illuminated signs (indoor pools).  - In pool halls which are used after lighting up time, emergency lighting is provided and is regularly checked   * The following signs prominently displayed in the pool hall/compound:-  |  |  |  | | --- | --- | --- | | “No Diving” | “No Bombing” | “No Running” | | “Shallow End” | “Deep End” | Pool water depth |     - In the case of a deep water pool, of variable depth and/or sudden slopes, a pool profile is clearly displayed at the side(s) of the pool with depths indicated.  - The deep water area is clearly indicated to non-swimmers. |  |
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| **Pool Outlets:** | | | | | |
| Is there a possibility of entrapment, or vortex formation? |  |  |  | - All outlets are protected by a grill with a mesh size of less than 8mm to prevent entrapment, and are securely fixed to the outlet so that it cannot be removed.  - There are at least two outlet grilles on each suction line to prevent excessive pressure causing entrapment if one is covered.  - If there is only one outlet grille on a suction line, it is covered with a suitable grill to prevent entrapment and vortex formation if it is covered by a person’s body. It has been tested in accordance with PAS 39: 2003, to ensure that there is no risk of hair entanglement.  - The water velocity at the outlets is less than 0.5 metre/second. |  |
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| Pool Interior (Flooring/Lining) |  |  |  | - There are no sharp or exposed edges to the tiled finish; nor broken or missing tiles, including at tile expansion joint positions.  - The pool floor is in sound condition, free from abrasive surfaces, sharp edges and is not slippery |  |
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| Pool Edge Definition: |  |  |  | - The pool edge is well defined and colour contrasted with the pool surround or pool tank edge. |  |

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| Handrails and Rest Ledges: |  |  |  | - Any rest ledges or handrails are secure and free of limb traps. |  |
| Pool Access Steps/Ladders: |  |  |  | - Pool access ladders are securely mounted, free of excessive movement or gaps in which limbs could be trapped.  - The ladders are positioned to prevent the risk of trapping between the ladder and the poolside. |  |
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| Blind Spots: |  |  |  | - Any concealed areas, or blind spots, are covered by existing lifeguard positions.  - Where permanent starting platforms, or underwater projecting features or fittings are fitted, adequate supervision and controls are in place. | Lifeguards will need to move around the poolside to avoid glare and be able to see the pool bottom |
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| **HAZARD** | **HAZARD FACTOR**  **[1 – 5]** | | **PROBABILITY FACTOR**  **[1 – 5]** | | **RISK FACTOR**  **[1 – 25]** | | **MEASURES THAT SHOULD BE IN PLACE TO REDUCE THE RISK FACTOR** | | **ARE ADDITIONAL**  **MEASURES NECESSARY**  **(if yes, please specify)** | |
| **TRAVEL TO / FROM POOL** | | | | | | | | | | |
| Coach involved in an accident: | |  | |  | |  | | **If no-one is physically injured:**  - Make a careful check of all individuals in the party. Ask the advice of authorities present and consider taking individuals to hospital for check  - Phone school contact with details of the incident and your plan  - Arrange regular update phone times  **If member(s) of party are injured, you will also need to:**  - Ensure a competent member of staff accompanies pupil to hospital  - Contact County Grave Emergency Contact, with details of what happened, names of injured (and injuries) and your plan  - Keep school contact informed of the extent of injuries and the release time of individuals  - Make arrangements for the return to school of remaining pupils  **School contact will:**  - Immediately contact the emergency services, always requesting assistance from the Police and also requesting attendance of the emergency services if anyone is injured in any way at all  - Alert Head teacher, Chair of Governors – school contact should only be giving parents very basic information about the incident at this stage until full information about any injuries or extent of these is established  - If necessary, contact County Grave Emergency Contact  - Ask pupils to turn off mobile phones to reduce phone calls home/causing undue worry  - Inform parents about the incident and injured/uninjured and extent of injuries known  - Note parents who intend to travel immediately to the hospital and inform Group Leader  - Consider inviting parents to school for updates, counselling and joint decisions  - Group Leader should take with him/her a mobile phone and a high visibility jacket; the vehicle should carry a breakdown warning triangle and a first-aid outfit with which to administer emergency first aid | |  |
| Procedures whilst travelling: | |  | |  | |  | | - Instruct all party members to wear seatbelts and check they do so  - Consider who should sit by an emergency exit  - Know who is prone to travel sickness and place them near the front  - In the case of any disabled pupils the School needs to ensure that wheelchairs are properly secured in position using the correct restraints fastened in position by suitably trained personnel | |  |
| Breakdown: | |  | |  | |  | | - Consult driver and decide whether to stay on coach or evacuate to safer place  - If this happens on a motorway then everyone should vacate the vehicle as quickly as possible and also leave the hard shoulder to assemble on the grassy verge on the far side of any vehicle impact barrier | |  |
| Significant delay: | |  | |  | |  | | - Keep school contact updated with developments on both the outward and return journeys  - School contact will keep parents (and leisure providers if on outward journey) informed with regular updates of progress | |  |
| Prevention of loss of pupil or member of staff:  Pupil lost for more than 10 minutes  Pupil lost for more than 1 hour | |  | |  | |  | | - Strict adherence to procedures for Head Counts at all arrival and departure points  - Emphasising to pupils that they should stay in groups as instructed at all times  - Emphasise the need to be at meeting points on time  - Gather all other pupils together, ensure their safety and keep them together  - Inform leisure provider staff  - Send member of staff to check the toilets, changing rooms, meeting point etc  - Notify local police, school contact  - Dependent on age, time of day and location, decide with the school contact whether to instigate the County Emergency Procedure | |  |
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| **SWIMMING LESSON:** | | | | | | | | | | |
| Accident and Incident Prevention and Reporting: | |  | |  | |  | | All accidents, incidents and near misses reported in accordance with Council procedures.    The pool rules prominently displayed at two separate points in the pool hall/compound.    A notice is prominently displayed indicating that the pool must not be used if the bottom of it is not visible at all points.    All class sizes are within the Swim England Safe Supervision in Pools and Bucks Safe Practice in School Swimming Policy & Guidance 2021.  These need to take into account the variable circumstances each teacher may encounter; i.e. age; special needs; challenging behaviour.    Whoever is in charge for the water safety of the group poolside should be told the number in the group by school staff so regular scanning and accurate head counts can be carried out during the lesson.  Since teachers are in loco parentis as well as having general health and safety responsibilities for the pupils under their charge then, particularly where sizeable groups of pupils visit a public or other swimming pool and/or pupils with disabilities and/or special educational needs also comprise the group, the school should ensure that sufficient teachers holding relevant qualifications, possibly even including lifeguard/saver qualifications, are also present with the pupils on poolside so that undue reliance is not always being placed on the effectiveness of the resident lifeguard in a situation where one or more pupils get into difficulties. The resident lifeguard at a public pool owns an equal duty of care to others using the pool at the same time as the pupils and so may not always be available immediately should a pupil from the group get into difficulties. Suitably trained teaching staff would be expected to immediately act and intervene in such circumstances.    Pupils should remove all jewellery, including nose and tongue studs, before being permitted to take part in pool/swimming activities delivered as part of the school curriculum    Safety equipment, such as poles, throwing ropes or throw bags, first aid provision and emergency alarms, needs to be:  - Fit for purpose  - Sufficient in quantity  - Regularly checked  - Positioned so as to be readily available when needed without creating additional hazards to pool users.  A variety of teaching and floatation aids should be available. Equipment should:  - Conform to any BS EN standard, where available  - Be checked before the session to ensure it is safe to use  - Be close at hand for easy access and use during the lesson  - Be placed tidily on the poolside to minimise tripping or other safety hazards  - Be used appropriately to avoid over-reliance on it  - Be appropriate and safe for the needs of the students  - Be correctly fitted or held according to the design or purpose of the aid. | |  |
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| Where an adult has responsibility for teaching more than two students, the recommended teaching position is from the side of the pool as this provides the best position to oversee the whole group and respond quickly to any teaching or emergency situation. | |
| Access to a telephone giving direct contact from the pool to the emergency services is essential. | |
| School staff should count pupils off the poolside and walk around the pool at the end of each aquatics lesson to ensure it is clear of all pupils. | |

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| Pupils |  |  |  | | All pupils understand the pool rules and have regular opportunities to demonstrate this understanding, e.g. ‘Whistle/alarm drill’. Any absent pupils are informed of pool rules and procedures as above and this should be documented. |  |
|  |  |  |  | | - Pupils only enter poolside once lifeguard/s is/are in position  - Pupils are assessed; baseline data is gathered before and during the first lesson.  - Pupils are not swimming out of their depth until after water based assessment and deemed competent to do so  - Use of appropriate swimming aids for pupils  - Teachers with a responsibility for water safety have easy access to a rescue pole |  |
| **SPECIFIC ACTIVITIES**  Diving |  |  |  | | Teachers hold relevant qualifications to teach diving.  - Refer to Bucks Safe Practice in School Swimming Policy and Guidance 2021, Health and Safety in Swimming Pools 2020 and also to AfPE Safe Practice in Physical Education and Sport 2020 for water depths, entries and progression for diving.  **Goggles should not be worn when learning to dive.** |  |
| Teaching water safety and self-rescue skills |  |  | |  | - Ensure pupils are competent at skills without additional clothing before introducing clothing  - Caution applied when introducing clothing in the water (e.g. introduce clothing gradually; appropriate depth)  - Contact rescues should not be taught to children under 13 years of age  - Increase the depth at which swimmers climb out gradually. |  |
| Teaching Water Polo |  |  | |  | - No goggles to be worn (risk of ball hitting eyes)  - Play in depth appropriate to swimming ability  - Spacing with balls  - Water polo hats to be worn where possible (ear protectors)  - Short games (be vigilant about pupils tiring)  - Smaller/lighter balls  - Use of aids where required |  |
| Teaching Synchronised Swimming |  |  | |  | - Use of aids where required  - Depth appropriate to ability  - Ensure synchronised swimming jumps/stepped entries have been approved by qualified Swimming Teacher and are supervised at all times (refer to safe depths for feet first entries: Bucks Safe Practice in School Swimming Policy 2020 and Safe Practice in Physical Education and Sport 2016) |  |
| Timed swims/Core Tasks |  |  | |  | - Be vigilant to tired swimmers who may be overtaxing their physical strength and swimming ability (risk of hyperventilation) |  |
| Are employees competent to carry out their duties? |  |  | |  | All Leisure Provider Staff who teach swimming are qualified to Swim England Level 2 or equivalent.  At least 2 School Staff accompany pupils to their School Swimming Lesson and hold the minimum Buckinghamshire Council requirement: Swim England Support Teacher of School Swimming Certificate. It is essential that these staff remain on pool side to provide an assisting role to Leisure Provider Staff. Refer to Bucks Safe Practice in School Swimming Policy.  A suitably qualified lifeguard is present on poolside at all times (qualified to appropriate depth).  Aquatics teachers and school staff who have responsibility for the water safety of the class in programmed activities should hold, at a minimum, The RLSS National Rescue Test for Swimming Teachers and Coaches (NRASTC).    There is a clear policy in place for adequate removal of a person with a suspected spinal injury from the pool.  All School Staff accompanying students to aquatic lessons should:  - Be given a clear role  - Understand the limits of the role  - Be confident on poolside  - Communicate with the other adults on safety issues  - Have the necessary discipline and control standards  - Regularly carry out head counts during, as well as at the beginning and end of, sessions  - Know, understand and be able to apply the pool normal operating procedures (NOP’s) and emergency action plan (EAP)  - Be suitably dressed for the role they play in the lesson.    A lifeguard chair is provided to give the lifeguard clear vision of all parts of the pool.  Safe Supervision of lessons will need to take account of whether the group has sole or shared use of the pool. Shared use with the general public would have further implications for the supervision and designated responsibility for safety, which would need to be satisfactorily addressed. |  |
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| Clothing:  Cultural or Religious requirements  Goggles |  |  | |  | - One piece costumes or tight swim trunks or shorts – no Bermuda style shorts  - Children with long hair should wear caps to prevent vision being affected  - Correct balance between safety, cultural requirements and the need to be able to see the limb movements of students  - As required by Bucks Safe Practice in School Swimming Policy and Guidance 2020, pupils wishing to wear goggles must bring a letter signed by parents giving consent (See Appendix G, for sample letter)  - Pupils must have been taught to put on and take off goggles in the correct and safe fashion (i.e. to ensure protection of eyes from impact damage through stretching the eyepieces away from the face with wet fingers)  - Goggles should be British Standard Approved goggles which include makes such as Speedo or Zoggs.  - On occasions pupils will be asked to remove their goggles in order to safely perform certain aquatic activities. |  |
| Protecting children: |  |  | |  | - Children are monitored while changing.  - Separate school changing areas made available where possible  - Adequate supervision of changing rooms  - Where necessary, children are given assistance changing  - If both male and female staff are not able to accompany each class, enlist cooperation of pool staff (assured and consistent; familiarity and adherence to Safeguarding Policies).  All staff and observers have been DBS checked, and formal checks have been made of the details of the hirer’s Safeguarding policies. |  |
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| Managing Un-Programmed Sessions, and external hiring’s: |  |  | |  | If un-programmed sessions take place, procedures are in place for monitoring weak swimmers.  Aquatics teachers and school staff who have responsibility for the water safety of the class in unprogrammed activities should hold, as a minimum, either of the following awards:  - The RLSS National Pool Lifeguard Qualification  - The STA Pool Lifeguard  There are procedures in place for the use of the pool by the public and the supervision of children under 8. |  |
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| **Disabilities/Special Needs** | | | | | |
| Dealing with persons with special needs |  |  |  | An individual written risk assessment has been made for all users of the pool who have disabilities/special needs.  If persons with special needs, or mobility difficulties, use the pool suitable hoisting equipment is available and sufficient additional helpers will be present, including 1:1 supervision, if required.  Where manual support is provided in the water by additional adults, care needs to be taken to:  - Avoid embarrassment to student or adult  - Ensure support is provided in an appropriate form. |  |
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| Manual handling and lifting of persons |  |  |  | Severely disabled pupils must never be manually lifted in and out of pools by staff and should only enter the pool where appropriate hoists have been provided with suitably trained operators available  All persons involved in lifting persons with mobility difficulties in and out of the pool receive training and refresher training in back care and the use of the hoist, slings and other lifting equipment.  All hoists and slings are examined and inspected by a competent person every six months and records of these inspections are kept?  All slings are cleaned and laundered regularly. |  |
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| **Relevant Medical Conditions** |  |  |  | Group leaders need to ensure that they are fully briefed about any potentially life-threatening medical conditions affecting their pupils including what signs they should be looking for and what action they need to take, such as whether there needs to be one-to-one supervision in the pool. This should not compromise the numbers of qualified members of staff on poolside; the additional adult (DBS checked, confident in water and able to swim) does not need to be qualified but is aware of the Pool NOP and EAP.  The emergency evacuation of this group has been considered and recorded in the Emergency Action Plan?  - All staff on poolside aware of all known medical conditions prior to the commencement of the lesson  - Written permission must be obtained before pupils can take part  - Pupils must be supervised carefully and by a responsible adult. This may require additional staff to aid in supervision  - Pupils with epilepsy require careful 1:1 observation, as shimmering water or flickering lights may trigger a seizure  - Asthma inhalers labelled and brought onto poolside by swimmer  - Diabetes medication labelled and brought onto poolside by swimmer or school staff  - Allergy and other required medication labelled and brought onto poolside by swimmer or school staff |  |
|  |  |  |  | If the pool is used by persons with Epilepsy, is there a documented policy in the Normal Operating Procedure, and the evacuation of this group has been documented in the Emergency Action Plan? |  |

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| **School** | **Name of Assessor** | **Position** | **Assessment Date** |
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| **Approved by** | **Approval Date** | **Review Date** | **Assessment Reference No** |
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| **Indoor/Outdoor Pool** | **Width** | **Depth** | **Principal Disinfectant** |
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**NB. RISK ASSESSMENT IS A CONTINUOUS PROCESS – SIGNIFICANT CHANGES IN THE WORKING ENVIRONMENT REQUIRES A RE-ASSESSMENT OF THE WORK.**

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| **Date of Review** | **Reviewed by** | **Approved by** | **Date of Approval** |
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