



# **Buckinghamshire Council**

**Safe Practice in School  
Swimming Policy & Guidance  
January 2025**

**DEVELOPED IN ASSOCIATION WITH**



**BUCKS SCHOOL  
SWIMMING PARTNERSHIP**



## Foreword

**I would like to thank the following individuals for their contributions and support in producing the Buckinghamshire Safe Practice in School Swimming Policy and Guidance:**

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Recent industry-wide updates from both the Association of Physical Education, Swim England (National Governing Body), and [Health and Safety in Swimming Pools 2024](#) have informed this updated policy.



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# Contents

This document is Part 1 of the Bucks Safe Practice in School Swimming Policy and Guidance and is aimed at everyone involved with the School Swimming Programme in Bucks. This document is available to download on the BSSP [website](#).

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**Part 2 – Technical Guidance on the Management of Swimming Pools and Swimming Pool Plant on School Sites** is a [separate document](#) for Headteachers and Plant/Pool Managers with their own school pools and is available from the Health and Safety Team at Buckinghamshire Council or the BSSP [website](#).

# Glossary of Terms

<b>AfPE</b>	Association for Physical Education
<b>AGP's</b>	Above Ground Domestic Temporary Pools (AGP's) (commonly referred to as "Pop-up Pools")
<b>ASA</b>	Amateur Swimming Association, now renamed Swim England
<b>FINA</b>	Federation Internationale de Natation also known as International Swimming Federation - Swim England are affiliated to FINA
<b>NCTP</b>	National Curriculum Training Programme
<b>UKCC</b>	United Kingdom Coaching Certificate
<b>ATSPRA</b>	Aquatic Therapy Shallow Pool Rescue Award
<b>BC</b>	Buckinghamshire Council
<b>BSSP</b>	Bucks School Swimming Partnership
<b>CIMSPA</b>	Chartered Institute for the Management of Sport and Physical Activity
<b>DBS</b>	Disclosure Barring Service
<b>DfES/CCPR</b>	Department for Education and Skills/Central Council for Physical Education
<b>EAL</b>	English as an Additional Language
<b>EAP</b>	Emergency Action Plan
<b>EHO</b>	Environmental Health Officer
<b>HLTA</b>	Higher Level Teaching Assistant
<b>HSE</b>	Health & Safety Executive
<b>IOS</b>	Institute of Swimming
<b>ISPE</b>	Institute of Swimming Pool Engineers
<b>ISRM</b>	Institute of Sport and Recreation Management
<b>NC</b>	National Curriculum
<b>NCTP</b>	National Curriculum Training Programme
<b>NOP</b>	Normal Operating Procedure
<b>NPLQ</b>	National Pool Lifeguard Qualification
<b>NRASTC</b>	National Rescue Award for Swimming Teachers and Coaches
<b>OEAP</b>	Outdoor Education Advisers' Panel
<b>PSOP</b>	Pool Safety Operating Procedures

<b>PWMC</b>	Pool Water Maintenance Contractor
<b>PWTAG</b>	Pool Water Treatment Advisory Group
<b>QCF</b>	Qualification and Credit Framework
<b>RAPs</b>	Register of Aquatic Professionals
<b>RIDDOR</b>	Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
<b>RLSS UK</b>	Royal Life Saving Society
<b>RLSS UK NWSMP</b>	RLSS UK National Water Safety Management Programme
<b>RNLI</b>	Royal National Lifeboat Institution
<b>SEND</b>	Special Educational Needs &/or Disabilities
<b>STA</b>	Swimming Teachers' Association
<b>STA/NaRS (PL)</b>	National Pool Lifeguard Certificate
<b>SE</b>	Swim England (the national governing body for swimming in England)
<b>TA</b>	Teaching Assistant

# Definitions

**Teachers in charge of School Swimming and Water Safety within their school:** The named teacher or member of staff responsible for coordinating swimming arrangements for their school.

**Accompanying School staff:** These are the adults employed by the school or volunteers chosen to accompany the pupils to their swimming lesson.

**Leisure providers:** This refers to staff in pools coordinating and providing School Swimming and Water Safety who are employed by the leisure facility (staff and management).

**Specialist Swimming Teacher:** The individual in charge of the School Swimming and Water Safety lesson, as a minimum, qualified to Swim England (ASA) Level 2 or STA Level 2 Certificate in Teaching Swimming.

**Swimming Teacher Assistants:** Individuals that can work under the supervision of a specialist swimming teacher, qualified to Swim England (ASA) UKCC Level 1 or STA Level 2 Award in Teaching Swimming.

**Lifeguard:** The individual responsible for lifeguarding; intervention, rescue and resuscitation of swimmers in difficulty.

# Meet the BSSP Swimming Team

The BSSP Swimming Team are based at Aylesbury High School and can be contacted by phone: 01296 388222 or email [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk)



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# Key to Boxes

 <p><b>STATUTORY</b> Information</p>	 <p><b>IMPORTANT</b> Information</p>
 <p><b>KEY</b> Information</p>	 <p><b>USEFUL</b> Links</p>

# Summary

This document:

- Sets out the policies and provides guidance on Safe Practice in School Swimming and Water Safety, whether at a school pool, hydrotherapy pool, public pool or during school visits. It aims to keep everyone involved in school swimming safe,
- Includes the policies and procedures of Buckinghamshire Council (BC) and Bucks School Swimming Partnership (BSSP) based on current national guidance in relation to School Swimming and Water Safety lessons, swimming pool safety and educational visits, which may include water based activities,
- Reflects current working practices of the BSSP Swimming Team.



The appendices contain exemplar materials and greater detail on local and national guidance. **Part 2** (a separate document) contains **Technical Guidance on the Management of Swimming Pools and Swimming Pool Plant on School Site**.

**THIS POLICY IS FOR ALL BUCKINGHAMSHIRE COUNCIL (BC) MAINTAINED SCHOOLS. IT IS STRONGLY RECOMMENDED THAT ACADEMIES, FOUNDATION AND VOLUNTARY AIDED SCHOOLS ALSO FOLLOW THE GUIDANCE WITHIN THE POLICY.**

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



In the event of a pandemic (National Emergency), schools will need to ensure that they follow the latest government guidance.

# Introduction

The following policy has previously been through wide consultation involving; the Bucks Swim Focus Group, Headteachers, leisure providers, swimming coordinators, Swim England and the Royal Lifesaving Society (RLSS UK), to provide a valuable and accurately informed working document.

Following recent industry-wide updates from both the Association of Physical Education and Swim England (National Governing Body), this document has been revised and updated by Buckinghamshire Council (BC) and BSSP.. It is intended to inform and support the following:

- Headteachers,
- Governors,
- Teachers in charge of School Swimming and Water Safety within their school,
- Leisure providers,
- Swimming teachers,
- School staff accompanying pupils to their school swimming lessons.

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

Swimming is a highly beneficial life saving activity. It supports the acquisition and development of physical literacy, along with skills for health and enjoyment. As a threshold skill, it also gives access to many other water based recreational activities. It is also incredibly good for your physical and mental health and wellbeing - it is the only activity you can do at any age and ability. Nevertheless, it also carries the risks of death through drowning or injury by brain damage through near drowning.

Therefore, the teaching of swimming ('**Wet Physical Education**') must be about knowing what to do if someone gets into trouble in the water; or if a strong current takes your friend away from the edge; or you fall in when running by a river or canal. This can be educated in the classroom with supportive **FREE** resources from; the [RNLI](#), the [RLSS UK](#), [Swim Safe](#) and [Swim England \(Charter\)](#).



The teaching and learning of swimming and water safety therefore requires the utmost care on the part of all concerned.

# Key Changes

A number of changes and additions have been made to this Policy. Please see the table below for an overview of these and where to find them.

	What	Found where	Page No.
1	NC swimming outcomes including Water Safety and the Water Safety Code - Greater detail and clarification	Introduction	13
2	Planning and implementing a School Swimming Programme - A checklist of actions for schools	Checklist of Requirements	16
3	NC Self-rescue requirements and information about Water Safety Awards for schools	Teaching Self-Rescue and Water Safety	18
4	Staff accompanying pupils to swimming lessons - Clarification	Responsibilities	26
5	Ensuring all staff accompanying pupils to school swimming have read and understood (by annually signing and dating) the current Normal Operating Procedure (NOP) and Emergency Action Plan (EAP),	School Responsibility - Governors and Headteachers	23
6	Partnership Agreement for schools and leisure providers to clarify standards, roles and responsibilities	School staff accompanying pupils to their school swimming and water safety lessons	26
7	Have a knowledge and understanding of the schools behaviour policy to award appropriate behaviour e.g. House Points, Merits, Class Chart and/or Class Dojo	The Specialist Swimming Teacher	28
8	Buckinghamshire Council statement and Industry partners' guidance on use of temporary 'pop-up' pools <a href="#">Appendix C2</a>	"Pop-Up" Pools	36
9	Minor incidents and accidents - Clarification on reporting	First Aid Arrangements	38
10	SEND - Information on the Swim England Inclusion Hub: <a href="#">Swim England Inclusion</a>	Swimmers with Special Educational Needs &/or Disabilities (SEND)	40
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<b>18</b>	National Rescue Award for Swimming Teachers and Coaches	Lifeguarding qualifications	62
<b>19</b>	Swim England Updated Diving (Shallow Racing Entry Dives) - Guidance; No less than 1.35m depth	Diving (Shallow Racing Entry Dives)	65
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<b>21</b>	Volunteers in School Swimming Lessons - Safer Recruitment Process	Volunteers in School Swimming Lessons	77
<b>22</b>	Changing Rooms (Safeguarding) - Further information for schools including guidance from NSPCC and facilities for transgender students	Supervision of Changing Rooms	78
<b>23</b>	Swimming as part of educational visits - removal of some content; addition of link to national guidance	Educational Visits	86
<b>25</b>	Open Water Swimming - Further National guidance	Natural Water Bathing/Open Water Swimming	86

# Checklist of Requirements

Checklist to be completed by the Headteacher and/or Teacher in charge of school swimming (when planning and/or implementing School Swimming Programme) – <u>All Schools will need to complete the following actions</u>		Tick Done
1	Headteacher, lead Governor, teachers and TA's involved in school swimming to read Bucks Safe Practice in School Swimming Policy & Guidance 2024	
2	Identify pool to be used and ensure leisure provider is aware of policy requirements	
3	Obtain, read and understand the Pool's current NOP and EAP - all staff involved in school swimming to sign to show that they have read and understood these documents	
4	Train a minimum of 2 members of school staff, who will accompany the pupils to their school swimming lesson - ensure qualifications are relevant to the pool setting	
5	Ensure staff qualifications remain up to date, undertake CPD within a 5 year period	
6	Check with leisure provider to ensure that lifeguard certificates/qualifications are current and appropriate	
7	Schools with own pools to ensure lifeguard qualifications are relevant and up to date	
8	Before the school swimming programme commences, visit the pool for a Health and Safety Induction	
9	Agree and sign Partnership Agreement/Service Level Agreement	
10	If hiring a pool, ensure that the Hire Agreement has been read and signed by the Bursar and Headteacher and a copy of this is kept by the school	
11	Request the leisure provider Insurance	
12	Complete a Trips and Visits Form	
13	Read and understand leisure provider Risk Assessment	
14	Develop own Risk Assessment for school swimming for each group	
15	Plan the school swimming programme with the leisure provider to ensure that inclusion of pupils with additional needs has been considered	
16	Prior to school swimming taking place, ascertain if there are any <b>volunteer(s)</b> supporting your school's delivery of their swimming and water safety programme - ensuring that the relevant paperwork is in place in regard to Safer Recruitment and your Safeguarding Policy.	
17	Implement the School Goggle Policy	
18	Send letter to parents to introduce programme and request information on pupil ability	
19	Ensure information on specific medical conditions (including SEND) is provided to the Leisure Centre Swim Manager (and team) and that medication will accompany pupil to school swimming lesson	
20	Identify assessment methods to demonstrate progress of pupils, consider which school swimming awards will be undertaken	
21	A dated register (hard copy or electronic) detailing learning outcomes for pupils (in line with NC requirements)	
22	All documents are kept in the School Swimming Folder (hard copy or electronic) so that staff involved in school swimming can access these documents. The Governor in charge of School Swimming and Headteacher are aware of the above	

# National Curriculum Swimming



Physical Education including Swimming is a National Curriculum Foundation Subject and thus **STATUTORY**. Parents do not have the right to withdraw their children from school swimming.

All schools must provide free Swimming instruction in either Key Stage 1 and/or Key Stage 2. By the time a child is ready to leave primary school at the end of Year 6 they should be able to:

- Perform safe self-rescue in different water based situations
- Swim competently, confidently and proficiently over a distance of at least 25m
- Use a range of strokes effectively, for example; front crawl, backstroke and breaststroke

## What do the outcomes mean?

### **1. Perform safe self-rescue in different water-based situations**

Safe self-rescue is taught from the very first lesson; for example, safe entries and exits, being able to regain feet and roll from front to back to float. These skills support being a proficient swimmer and obtain the knowledge to stay safe in, on and around water. Safe self-rescue delivery supports with understanding the potential dangers of water and how to act responsibly when near different types of water (e.g. canal, river, lake, reservoir, sea); how to use self-rescue skills and when to use them if they unintentionally fall into the water or get into difficulty; and what to do if someone else gets into trouble in the water and who to call for help.

### **2. Swim competently, confidently and proficiently over a distance of at least 25 metres.**

Students should demonstrate the ability to swim confidently 25m without touching the walls or floor, utilising a recognised stroke which is as strong and the end of the swim as it was at the start. Wherever possible, part of the swim should be swum in deep water. This is the minimum distance, and many students may be able to swim further.

### **3. Use a range of strokes effectively (to include front crawl, backstroke and breaststroke)**

Students should be given the opportunity to swim alternating (front crawl and backstroke) and simultaneous (breaststroke) strokes demonstrating a minimum of two strokes for a distance of at least 10m per stroke. Students should be given the opportunity to select the most appropriate stroke or action for the required circumstance (e.g. trading water using breaststroke legs when signalling for help, swimming front crawl when racing, swimming back paddle when conserving energy).

## Water Safety and the Minimum Standards for School Swimming

In September 2023, Swim England and the Swimming Teachers Association created a **nine-point plan** to provide clarity and consistency for the national curriculum guidelines around performing safe self-rescue in different water-based situations.

Whilst two of the national curriculum outcomes were clearly defined, arguably the most important, safe self-rescue, could be interpreted in different ways. The guidance clearly defines the outcomes that make up safe self-rescue. These components were included as they bring together the most common fatal accidental drowning scenarios and the skills required to survive.

The Department for Education has confirmed that there is no intention to alter the national curriculum requirements for school swimming.

The nine outcomes, which should be completed by students in sequence in full-reach depth water wearing light clothing are;

1. Fall-in entry and recover to surface
2. Float on the back with minimal movement for 60 seconds without floatation equipment
3. Rotate from floating on the back to a vertical position
4. Tread water for 30 seconds
5. Whilst treading water, signal for help once, by extending one arm above the head and simultaneously shouting for help then returning the arm to the water to continue to tread water
6. Swim (without floatation equipment) 15m to a floating object, using a recognised personal survival stroke (head up, long arm front paddle or lifesaving backstroke)
7. Retaining the floating object, take up the Heat Escape Lessening Position (HELP) for 30 seconds
8. Form a Huddle position as a group for 30 seconds
9. Swim 15m to exit the water unaided

The outcomes also include possible reasonable adjustments for shallow water and students with special educational needs and disabilities.

They should allow for a consistent set of clearly measurable skill-based outcomes that combine to enable a young person to survive an unexpected entry to cold water until rescue or self-extraction is possible.

The suggested skills can also be downloaded from Swim England's School Swimming and Water Safety Charter website. The Charter also provides a range of free-to-download resources including certificates, guidance, lesson plans, water safety assembly, videos and more.



*Pupils should know the dangers of water and understand how to act responsibly when playing in or near different water environments.*

**Teaching Swimming and Water Safety at Key Stage 1 or 2 - A Guide for Primary Schools (produced by Swim England on behalf of the National Swim Group)**

This includes understanding and adhering to the advice of national and local water safety sites, being able to use appropriate survival and self-rescue skills if they unintentionally fall in or get into difficulty in the water, and knowing what to do if others get into difficulty. To ensure pupils fully understand this important area, 'water-based situations' should not only cover how an incident could occur, but also different types of water environments.

*As part of NC Swimming, pupils should be taught the key water safety messages (age appropriate); including the Water Safety Code:*

**Key water safety messages:**

- **Stop and Think:** *always swim in a safe place*
- **Stay Together:** *always swim with an adult*
- *if you fall in: **Float**, breathe and relax*
- **Call 999** or 112 *if someone else is in trouble*

**Stop and Think:**

*Always swim in a safe place:*

- *Water is always moving, so be careful of currents and tides*
- *The water may be significantly colder than you are used to*
- *Edges can be slippery or could break up*
- *There may be hidden dangers underwater*
- *Plan your activity - check weather, tide times, get local advice and wear the right clothing for your activity*

**Stay Together:**

*Always swim with an adult:*

- *Never swim alone - stay within arm's reach of an adult*
- *If entering the water, make sure someone stays at the side to help in an emergency*
- *Always try and swim at a lifeguarded venue or beach*

**Float:**

*If you fall in, float:*

- *Stay calm*
- *Float on your back*
- *Signal for help, raising one hand in the air and shouting for help*
- *If you can, swim to safety or hold on to something that floats*

**Call 999:**

*If you see someone else in trouble in the water call 999*

- *Never enter the water to save others*
- *Tell them to float on their back*
- *Look for something that floats to throw them; for example; a life ring or a football*
- *Keep watch until help arrives*



*Swimming teachers and school staff need to be particularly aware of swimmers tiring when swimming in clothing due to the resistance the clothes present in the water.*

*A key teaching point for the Water Safety Code is “**Shout, throw, never go**”. More information can be found [here](#).*

- *Water safety: knowledge and understanding of different water environments, how to stay safe when playing in and around water including recognising national swimming flags and warning signs and understanding national and local water safety advice*
- *What to do if others get into difficulties: stay safe: shout, signal; throw, do not go into the water; raising the alarm 999*
- *Play competitive games such as water polo and apply basic principles suitable for attacking and defending*

For further information and to look at these documents in more detail, click on [BSSP's Schemes of Work](#) and/or [Swim England Swimming Charter](#)



*RNLI lifeboats across the UK and Ireland launched 9,192 times in 2023, saving 355 lives.*

*Therefore, pupils need to understand how water-based incidents occur such as:*

- *falling into water when playing on a footpath*
- *falling out of a boat*
- *swimming in clothes*
- *becoming tired*
- *sustaining an injury*
- *being out of one's depth*
- *hampered by weeds or underwater hazards*
- *rough water or tides*

*Pupils should understand where water-based incidents occur, i.e. the potential hazards of moving water and the impact of cold water shock, in various bodies of water including:*

- *homes and gardens including ponds*
- *swimming pools (develop an understanding of different types of pools)*
- *beaches*
- *rivers*
- *canals and reservoirs*
- *quarries*

*Pupils should understand and be able to explain:*

- *the differences between swimming in open water and a heated swimming pool*
- *how strong swimmers can get into difficulties when the water is cold, unpredictable and deep*
- *the differences between swimming indoors and outdoors*

- *that getting in and out of open water is more difficult (in comparison to steps at a swimming pool)*
- *that you need to prepare differently for swimming outdoors; e.g. wearing a wetsuit and bright swimming hat*
- *that the conditions of open water can quickly change dependent on the weather*
- *that you may not be able to see under the water to spot potential hazards,*
- *the effects of cold water shock (and what happens if you are not prepared to swim in cold water)*

*AfPE Safe Practice in Physical Education, School Sport and Physical Activity, 2024*



The National Curriculum Swimming and Water Safety Group expects schools to provide swimming provision until all their pupils meet the minimum standards for school swimming and water safety. This means that schools may need to look at Top Up Programmes (these are additional lessons to help pupils achieve these standards).



Both the Bucks School Swimming Partnership and Swim England have awards for pupils aimed at meeting and exceeding National Curriculum requirements for Water Safety. BSSP: [Swimming Awards](#) / Swim England: [Swim England School Swimming Awards](#)

## Teaching pupils Lifesaving Skills

In addition to the Water Safety School Swimming Programme, schools may decide to teach pupils lifesaving, i.e. as part of the Rookie Lifeguard Programme. This should only be covered once pupils have an understanding of, and have developed competence in, self-rescue skills as a requirement of National Curriculum Swimming.



In addition to National Curriculum School Swimming and Water Safety lessons, schools may wish to look at the Rookie Lifeguard Programme: visit; <https://www.rlss.org.uk/pages/category/rookie-lifeguard>



Advice on resource packs and awards for teaching lifesaving skills at the appropriate key stages in primary and secondary education is available from the following:

- [RLSS UK- RLSS UK Awards](#)
- [STA School Swimming Academy Awards](#)
- [RNLI Education Section](#)

Swim Safe, a water safety programme from Swim England the the Royal National Lifeboat Institution, can be utilised for continued learning. For more information about Swim Safe, visit; <https://swimsafe.org.uk>

# Responsibilities

## Overall Council Responsibility

Buckinghamshire Council has a responsibility for ensuring safety in swimming in all maintained schools. As part of this responsibility BC, working with BSSP, provides the Safe Practice in School Swimming Policy and Guidance.



BSSP provides guidance and support for school swimming and offers a variety of training, all of which equip schools for safe school swimming.

## School Responsibility - Governors and Headteachers

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

- Completing **risk assessments** – member of staff carries a copy of this with them, together with emergency contact numbers in the School Swimming Folder (with copy held centrally by Headteacher)
- Ensuring all staff accompanying pupils to school swimming have **read and understood** (by **annually signing and dating**) the current Normal Operating Procedure (NOP) and Emergency Action Plan (EAP)
- Ensuring staff accompanying school swimming are **qualified** to support the delivery of school swimming and water safety and comply with their school's Safeguarding Policy. Schools should be sending their own staff, who have been trained. **Supply Teachers or trainees on placement should NOT accompany the school swimming lesson**
- Ensuring relevant **training** for school swimming is in place for staff
- Understanding what school swimming qualifications allow staff to do and ensure staff are confident and competent to carry out their role in school swimming
- Maintaining a **central record of staff qualifications and training** (in the Swimming folder) – BSSP holds a central database for all staff trained. Where individuals hold qualifications gained from other providers, they must submit copies of certificates to the BSSP Swimming Team
- Completing and returning the mandatory **School Swimming Policy Checklist** (previously referred to as "The Governor Checklist") issued by BSSP every two years
- Keeping current copies of the 'Conditions of Hire' and leisure provider insurance details within the School Swimming Folder

- Schools using pools (other than their own) request the pool's Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) and ensure that accompanying school staff read these, by signing and dating, to show an understanding of their responsibilities during the visit to the pool. These documents need to be kept in the School Swimming Folder
- Ensuring that **all relevant and up to date medical and health information (including SEND)** is maintained within the School Swimming Folder
- Headteachers of schools with pools on their site attending the course entitled **Swimming Pool Awareness for Headteachers, Chartered Institute for the Management of Sport and Physical Activity (CIMSPA)** - this requires refreshing every 3 years

## **Duty of Care - School Responsibilities**

*Whether a school is delivering their own school swimming and water safety programme in a school pool or utilising an external swimming lesson provider to deliver at school or going off site to an external swimming pool, the school has a non delegable duty of care to staff and students at all times during a school swimming water safety programme.*

*The Health and Safety Executive (HSE) and the industry lead bodies have combined to produce a specific health and safety guidance document for swimming pools entitled 'Health and safety in swimming pools' (HSG179).*

*The school has a responsibility to ensure due diligence is carried out when planning school swimming and water safety, to ensure that a safe and effective programme is delivered. This due diligence includes:*

- *Schools must ensure that the risk assessment and the pool safety operating procedure (PSOP) are sufficient to meet the school hire arrangements. Refer to HSG179*
- *Ensuring the swimming lesson provider's service level agreement is adequate for the school's requirements. It should stipulate the roles and responsibilities of school and external staff within the school swimming and water safety programme*

*Ensuring the qualification status of both school and external staff is adequate for lesson delivery. The Swim England Level 2 qualification is recommended for the delivery of school swimming lessons - [www.swimming.org/ios/course-information/level-2-swimming-teacher/](http://www.swimming.org/ios/course-information/level-2-swimming-teacher/) - and supporting school staff to hold the National Curriculum Training Programme (NCTP) Support Teacher of School Swimming qualification - [www.swimming.org/schools/school-swimming-training/](http://www.swimming.org/schools/school-swimming-training/)*

*Reviewing staff:student ratios to ensure they are adequate based on the age, ability, understanding levels of students, facility design and any other relevant considerations.*

*Ensuring an adequate level of safe supervision for all students in the water (this can be lifeguarding). Further details relating to safe supervision qualifications can be found from the Royal Life Saving Society UK (RLSS UK) website. The National Rescue Award for Swimming Teachers and Coaches - [www.rlss.org.uk/national-rescue-award-for-swimming-teachers-coaches-nrasc](http://www.rlss.org.uk/national-rescue-award-for-swimming-teachers-coaches-nrasc) - and the National Pool Lifeguard qualification - [www.rlss.org.uk/national-pool-lifeguard-qualification](http://www.rlss.org.uk/national-pool-lifeguard-qualification) - are potential supervision qualifications which should be confirmed within the risk assessment.*

- *Ensuring students are not permitted to access the poolside without adequate safe supervision in place on the poolside. Measures should be in place to stop uncontrolled access which should be identified within the risk assessment and adhered to; such as use of gates, shutters, signage and supervision.*

*Ensuring that the pool operation has adequate training and knowledge to safely manage the pool plant and centre operations - [www.swimming.org/io/ios-courses-for-pool-operators](http://www.swimming.org/io/ios-courses-for-pool-operators) . Schools should ensure that industry guidance from the Pool Water Treatment ADvisory Group (PWTAG) is adhered to either by the external provider or for the school pool - [www.pwtag.org](http://www.pwtag.org) .*

*Ensuring the welfare of students is met, with intervention if welfare needs are not being met; for example, insufficient air or water temperature, inadequate cleanliness.*

***The Woodland versus Essex County Council (2013)** case referred to a non-fatal drowning that resulted in life-changing injuries. The Supreme Court ruled that a public authority has liability in certain circumstances for the negligence of its independent contractors where students or vulnerable people are involved.*

***The school has a non-delegate duty of care.** If students are being taken to a pool facility as part of the school curriculum, then it is the school's responsibility to undertake checks and ensure they are providing appropriate supervision. The case decision is of particular importance as it has effectively changed the law to make public authorities liable for any negligence of its independent contractors where the injured part is deemed to be a vulnerable person, such as a child.*

*Under the Health and Safety at Work etc. ACT 1974, an operator must protect the 'health, safety and welfare' at work of all their employees, as well as others on their premises, including temps, casual workers, the self-employed, clients, visitors and the general public.*

*In addition, the operator should follow guidance from the Health and Safety Executive (HSE), HSG179 'Health and safety in swimming pools' as well as any industry guidance and best practice, which will help to protect those that use their facilities.*

*Operator requirements:*

- *Under the Management of Health and Safety at Work Regulations 1999, conduct risk assessments for the facilities, activities, users and equipment*
- *Produce a written pool safety operating procedure (PSOP), containing the normal operating procedures (NOP) and emergency action plan (EAP) for the facilities*
- *Provide a robust service level agreement with clearly defined roles and responsibilities*
- *Provide schools with the appropriate risk assessment for the activities and facilities that the school will be involved in*
- *Provide the school with the facility-specific pool safety operating procedure (PSOP), highlighting sections that are relevant to the school*
- *The most significant operational hazard is the provision of **inadequate poolside supervision**. Sufficient safe supervision should be provided from poolside as indicated in the risk assessment and PSOP. Both the operator and the school should be in agreement that the level of safe supervision is adequate*

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## Teacher in Charge of School Swimming and Water Safety

This member of staff must maintain the School Swimming Folder which includes:

- An up to date copy of NOP and EAP for the pool used. This needs to be signed by all staff accompanying school swimming to show they have read and understand these documents
- Risk assessment for each group
- Registers, including medical conditions; additional needs; pupil ability and staff accompanying pupils
- Up to date list of staff qualifications and training
- A signed copy of Pool Hire Agreement
- School Swimming Programme
- Printed copies of the online Accident and reporting forms
- [Schemes of work and assessment sheets](#)

They should also:

- **Visit** the pool before swimming programme commences to understand all relevant NOP/EAP aspects, risk assess & plan the programme with the specialist swimming teacher
- **Complete Trips & Visits form** (agreed by Headteacher). For Open Water Swimming, Swimming in the Sea, Use of Hotel Pools, see section on Educational Visits, page 78
- Undertake **Risk Assessments** (please refer to page 30 and Appendix [A](#), [B](#) or [C](#) - Model Risk Assessments), signed by all staff involved (including Headteacher). This will include written information on pupils with medical conditions and/or additional needs and **must** be shared with the specialist swimming teacher prior to the School Swimming and Water Safety programme commencing. This information needs to be updated where necessary
- **Complete and share relevant documents with leisure providers** (schools may choose to use the following forms: *Swimming class registers including information on pupils with medical conditions and/additional needs; information for Leisure Providers - Appendix [X](#)*)

## Accompanying School Staff

School staff have an overall **DUTY OF CARE** that applies for any activity in which pupils are involved and they cannot transfer their duty of care to anyone else. This applies to all activities within the school curriculum and extra-curricular activities organised by the school during and outside of school hours, whether on or off school premises.

School staff must:

- Hold relevant, up to date qualifications
- Be given a clear role and understand the limits of their role
- Be confident on poolside
- Communicate effectively and appropriately with each other and leisure provider staff on safety issues
- Be suitably dressed for their role
- Ensure pupils are appropriately supervised when changing
- Ensure pupils are under control at all times
- Take head counts before, during and after sessions. This should be recorded in the swimming registers

- Follow the pool's NOP and EAP; all staff on poolside should be aware of the emergency procedures of any external provision, ensuring that pupils are aware of what to do in the event of an emergency evacuation
- Hold responsibility for reporting on the progress of school swimming (through ongoing monitoring and guidance from leisure provider staff)
- Be aware of the additional needs or medical conditions of the pupils they are teaching so that correct measures/precautions can be put in place with guidance from the specialist swimming teacher



Specialist swimming teachers should work with school staff to oversee the assessment of pupils against Award Criteria to identify those pupils unlikely to meet the minimum requirements for National Curriculum Swimming.

School staff must remain on poolside to provide an assisting role to support the school swimming lesson and as a minimum, must hold the Swim England Support Teacher of School Swimming Certificate. Please refer to the section on Teaching Qualifications, see page 47.

**School Teachers** should accompany their own classes to their school swimming lessons whenever possible, as they know their pupils well. They should have an overview of the teaching of their pupils and the conduct of their class. There should be a nominated member of staff accompanying each group, who holds responsibility for:

- Progress of pupils
- Assessing confidence and competence of accompanying staff (with guidance from leisure provider staff)
- Enforcement of policies and procedures
- Sharing of procedures and standards to all school staff involved in the School Swimming and Water Safety lesson



The school has a responsibility to ensure due diligence is carried out when planning school swimming and water safety, to ensure that a safe and effective programme is delivered. This due diligence includes:

- Schools must ensure that the risk assessment and the pool safety operating procedure (POSOP) are sufficient to meet the school hire arrangements. Refer to [HSG179](#)
- Ensuring the swimming lesson provider's service level agreement is adequate for the school's requirements. It should stipulate the roles and responsibilities of school and external staff within the school swimming and water safety programme

Ensuring the qualification status of both school and external staff is adequate for lesson delivery. The Swim England Level 2 qualification is recommended for the delivery of school swimming lessons and supporting staff to hold the National Curriculum Training Programme (NCTP) Support Teacher of School Swimming qualification.

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Specialist swimming teachers also have a duty of care for the pupils directly in their control and for ensuring an appropriate School Swimming and Water Safety programme for the group. It is the responsibility of the school staff to monitor the progress of the pupils, regardless of who teaches them. Equally, the teaching programme needs to be agreed before the course and if necessary moderated during the course. Having a teacher standing on the side passively watching is a massive waste of

talent and energy, which could otherwise benefit the class. Involvement, not simply lesson observation, not only reduces teacher pupil ratio, but also enhances the quality of experience for the pupils concerned.

Prior to their deployment to a poolside role, school staff should have the opportunity to express a lack of confidence or ability. **If staff lack confidence in the role, cannot swim or are reticent about being on poolside they should not accompany pupils to their school swimming lessons.**

## The Specialist Swimming Teacher (e.g. leisure provider swimming teachers)

**(Qualified to a minimum to Swim England Level 2 or STA Level 2 Certificate of Teaching Swimming) needs to:**

- Understand their role in school swimming
- Work in partnership with the Teacher in Charge of School Swimming and Water Safety and other School staff accompanying pupils swimming
- Liaise with lifeguards and other centre staff regarding the lessons
- Ensure an ongoing and dynamic risk assessment is undertaken for each group involved in swimming activities
- Be aware of the additional needs and medical conditions of the pupils in their class, risk assessing these within the context of the swimming environment
- Ensure the safe conduct of the class whilst the pupils are in the water and on the poolside
- Enable pupils to have fun in and near water
- Have a knowledge and understanding of the schools behaviour policy to award appropriate behaviour e.g. House Points, Merits, Class Charter and/or Class Dojo
- Prepare, plan and teach high quality School Swimming and Water Safety lessons in partnership with the school appropriate to the pupils' age and ability – showing good understanding of National Curriculum requirements
- Work with school staff to oversee the assessment of pupils against selected Award Criteria
- Ensure sufficient lifeguard provision is on poolside (understand the pool's NOP and EAP)
- Understand their role and responsibility in the case of an emergency

## Mobile Phones

School staff should not be using or referring to their mobile phones during school swimming lessons as this could compromise their ability to give their full attention to their pupils and the lesson taking place. Their primary responsibility is the safe supervision of their pupils.

For an outdoor school pool which may have no landline or alarm, the school may include the use of walkie talkies in their NOP & EAP. These must be fully charged and manned responsibly at all times. Staff may have mobile phones as a backup (again, these must be fully charged with a reliable signal).



Carrying a fully charged mobile phone with a good signal may form part of the school's Risk Assessment for contacting emergency services or the school in the event of an incident or injury.

# Normal Operating Procedure (NOP)

For some pupils, School Swimming and Water Safety could be their first experience of being in a swimming pool. It is important that they know and understand the rules of the pool, pool layout and the possible hazards of this new environment (See Appendix [D](#)).

All school staff must have read and signed to show they understand the Normal Operating Procedure (NOP) for the pool being used for school swimming, to ensure that they are clear on their role and responsibilities during normal operations to maintain safety.

## For School Pools

Schools with their own pools will need to draw up the NOP for their pool. This needs reviewing at least annually to ensure it is current, relevant and up to date.

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

# Emergency Action Plan (EAP)

An Emergency Action Plan details roles and responsibilities in the event of an emergency (Appendix [E](#)).

The Emergency Action Plan is the responsibility of a leisure provider when a third party pool is being used. The responsibility for maintaining a safe swimming pool and building lies with the leisure provider when this is the case.

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



**Schools using their own pools will need to draw up or review their own risk assessment as a basis for writing the EAP.**

Safety signs, including arrangements in the event of an emergency, need to be clearly visible in relevant areas of the pool area and pupils need to be made aware of these. School staff in conjunction with leisure provider staff, need to ensure that, for pupils for whom English is not their first language, those who are visually impaired or have difficulty in reading, understand all safety signs.

Regardless of the type of pool being used (leisure provider/school pool/private school pool), all school classes should run emergency practice drills to evacuate the water and summon assistance during the first lesson of each term. These should then be carried out regularly afterwards in order that both staff and pupils recognise and understand emergency signals and procedures and know how to respond to them. Emergency foil blankets should be available near emergency exits.

Consideration needs to be given to:

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

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

**All fire doors** must be able to open without the aid of a key at all times the pool is in use. These should be checked at the start of every lesson.

**Safety equipment** such as poles, throwing ropes or throw bags, first aid provision (such as emergency blanket) and emergency alarms need to be fit for purpose and sufficient in quantity. These need to be regularly checked, records kept and an initialled checklist available by the alarm. Equipment needs to be accessible and readily available when needed without creating additional hazards to pool users.

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

All pools need to have a clear procedure for removing **pupils with physical disabilities**. Where a pool has a spinal board/special recovery stretcher, staff should receive training. Training can be provided by [Herts Handling](#) Training Ltd. It is recommended that SEND schools have a spinal board on the poolside.

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

- Conform to any British Standard
- Be checked before the lesson to ensure it is safe to use
- Be close at hand for ease of access during lesson but be kept tidily on poolside to minimise trip hazards
- Be used appropriately to avoid over-reliance
- **Not to be given to non-swimmers to allow them into water out of their ability depth**
- Be appropriate and safe for the needs of pupils
- Be correctly fitted or held according to the design and purpose of the equipment/aid

*Any electrical equipment on the poolside needs to be:*

- *Designed for use in an aquatic environment*
- *Of low voltage or battery operated*
- *Located so as not to create an additional hazard*
- *Have current circuit breakers attached*
- *PAT tested annually*
- *Checked regularly*

*No one in the water should handle any electrical equipment.*

*(AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2020 Edition)*

## What to Expect from Your Pool Provider

Pool safety operating procedure (PSOP), consisting of normal operating procedure (NOP) and emergency action plan (EAP) should be known, applied and practised, as relevant, by all staff (school and pool) working in the lesson.

<p style="text-align: center;"><b>NOPs</b> Normal Operating Procedure</p>	<p style="text-align: center;"><b>EAPs</b> Emergency Action Plan</p>
<p>These are the day-to-day organisational systems based on risk assessment and would typically include:</p> <ul style="list-style-type: none"> <li>● Organisation chart - identifying lines of authority</li> <li>● Plan of the building (plans and layout)</li> <li>● Alarms systems (inc. location)</li> <li>● Emergency equipment (inc. location)</li> <li>● Details of the pool(s) (e.g. dimensions, depth, pool signage)</li> <li>● Pool equipment and features</li> <li>● Maximum bather load/occupancy (per session/pool, staff:student ratio)</li> <li>● Control of access/admission</li> <li>● Dealing with the public</li> <li>● Pool rules</li> <li>● Potential risk factors</li> <li>● Lifeguard responsibilities, duties and arrangements</li> <li>● Lifeguard positions, zones, rotations, etc</li> <li>● Technology</li> <li>● Staff uniform</li> <li>● Safe systems of work (detailed instructions of tasks completed by employees)</li> <li>● Operational systems and work instructions (details instructions for the work you undertake)</li> <li>● Dealing with contractors</li> <li>● Training and competency requirements of all staff (inc. lifeguards, participation)</li> <li>● First-aid provisions and training (equipment, employed, trained, qualifications, reporting)</li> <li>● Use of video and photo equipment</li> <li>● Condition of hire to outside organisations</li> </ul>	<p>This should establish the action that should be taken in emergency situations and who takes the action. Emergencies should include:</p> <ul style="list-style-type: none"> <li>● Overcrowding</li> <li>● Disorderly behaviour (including violence to staff)</li> <li>● Lack of water clarity (turbidity) or chemical reading outside of parameters</li> <li>● Broken glass in the pool</li> <li>● Emission of toxic gases/chemical(s)</li> <li>● Outbreak of fire (or building evacuation)</li> <li>● Controlled or partial evacuation</li> <li>● Bomb threat/terrorism threat/discovery of suspicious packages</li> <li>● Lighting failure</li> <li>● Electrical failure</li> <li>● Structural failure</li> <li>● Serious injury to a swimming pool user</li> <li>● Weather conditions - weather that impacts safety (e.g. outdoor pools)</li> <li>● Discovery of a casualty in the water (including drowning)</li> <li>● Dealing with blood, vomit, urine and needles and sharps</li> <li>● Faecal release in the swimming pool</li> <li>● Lost, found or left child</li> <li>● First aid</li> <li>● Lift failure</li> <li>● Robbery or theft</li> <li>● Failure of technology</li> <li>● Accident, incident and follow-up action</li> </ul>

*Swimming pools are high-risk environments. School staff accompanying students, together with specialist swimming staff, should ensure that they know and implement the PSOP for the facility being used and are capable of carrying out their required role.*

*The PSOP will identify potential hazards and associated risks at the swimming pool in question and detail how to manage these.*

*The EAP will detail the methods for dealing with a variety of emergency situations and include evacuation arrangements and your school's role within the EAP.*

*It is essential that school staff using their own pool, hiring another school's swimming pool or other external pool understand their role in the emergency evacuation procedure.*

*Consideration needs to be given to the fact that, during an emergency evacuation, students will have bare feet, be wearing little clothing and may be outside for an extended period of time. Pool operators should make provision for these factors in their EAP.*

*The risk assessment applied to a swimming pool environment frequently highlights common hazardous design features that should then be identified in the PSOP together with methods for managing and reducing the risks they pose. Supporting school staff must be aware of the site-specific hazards and control measures.*

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## Risk Assessment



See Appendix [A](#): Model Risk Assessment for a Public Pool  
See Appendix [B](#): Model Risk Assessment for Indoor School Pools  
See Appendix [C1](#): Model Risk Assessment for Outdoor School Pools

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

Swim England in their guidance Safe Supervision for Teaching and Coaching Swimming highlight six important factors, these are:

### **Pool design**

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

- *Shape and blind spots including those resulting from the position of equipment*
- *Special water features such as sprays, inlets and wave machines*
- *Glare, reflection, lighting and noise*

### **Depth**

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

- *The depth and extent of shallow water areas*

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

### **Water quality**

*Two factors need to be considered:*

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

### **Pool organisation**

*The arrangements of the lesson must be considered:*

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

### **Staffing**

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

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

### **Pupils and ability**

*The factors to be considered include:*

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

The school must provide the specialist swimming teacher with a register, up to date medical information and any other relevant information (e.g. Additional Needs) about the pupils, at least one week before the swimming programme takes place.

The completed register of pupils present should be updated and handed to the specialist swimming teacher for them to check before each lesson (see Appendix [X](#)).



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

- Water quality and temperature
- Integrity of pool enclosure/building
- Availability and condition of rescue/emergency equipment
- The age, range of ability and numbers of pupils in each class
- The activities they will be undertaking
- The qualifications of the people leading and supporting the session
- Known additional needs/medical conditions
- Weather conditions

**If in any doubt about the safety of the lesson, don't proceed. Ensure concerns are addressed and resolved with the leisure provider prior to pupils being allowed to swim.**

## Public Pools

The school needs to make a judgement if the public pool is safe and appropriate for School Swimming. Where public pools are used regularly for swimming lessons, the school and leisure provider should arrange an induction course on the NOP and EAP to ensure that all accompanying School staff are clear about how the pool operates and the role they will have to play in an emergency, before the school swimming programme starts.

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

- Risk assessments for the pool
- The Normal Operating Procedure (NOP)
- The Emergency Action Plan (EAP)
- Conditions of hire/hire agreement
- Pool Rules (usually found in NOP and displayed on poolside)
- Any special requirements or medical conditions of pupils



The Appendices incorporated within this policy contain model procedures and forms, which must be made specific to each school and pool.

## Above Ground Domestic Temporary Pools (AGP's) (commonly referred to as "Pop-up Pools")



**Bucks Council DO NOT recommend the use of temporary pools for any of its schools. For schools that decide to use such provision please refer to the latest Swim England guidance on temporary 'pop-up' pools. Guidance may wish to be sought from Bucks Council Health and Safety Team. (See [Appendix C2](#))**

## Above Ground Domestic Temporary Pools (AGP's) (commonly referred to as "Pop-up Pools")

Industry partners Swim England, the Swimming Teachers' Association and Swim Wales have published a comprehensive briefing note providing guidance to support the safe operation of temporary 'pop-up' swimming pools. The briefing note can be read by clicking [here](#).

*These guidelines are designed to ensure that all temporary aquatic facilities uphold the highest safety, hygiene, and operational standards, safeguarding all who use them. The increasing prevalence of temporary pools has underscored the importance of ensuring that these facilities meet rigorous standards to protect users and provide safe learning environments.*

*Swim England, the STA and Swim Wales do not endorse the use of any temporary "pop-up" swimming pools that fail to meet these operational and safety standards.*

*It is critical that these facilities adhere to the published guidelines, including but not limited to:*

- *Compliance with relevant health and safety regulations such as HSG179 and PWTAG technical note TN65*
- *Water quality safety*
- *Robust structural integrity*

*Facilities that do not meet these standards place participants at unacceptable health and safety risks and compromise the quality of aquatic instruction.*

*Together, Swim England, the STA and Swim Wales remain committed to promoting safe, accessible, and high-quality aquatic experiences for all.*

*All operators of temporary pools are encouraged to carefully review and implement the new guidance.*

*Additionally, parents, schools and environmental health teams are urged to verify that any facility they use adheres to these essential requirements and take appropriate enforcement action where this is not the case.*

*Any school considering utilising a 'pop-up pool' is advised to read the briefing note and contact [facilities@swimming.org](mailto:facilities@swimming.org) if they have any further questions. (Swim England and Swim Wales 16 December 2024).*

# Medical Information

The Headteacher should ensure that all relevant and up to date medical and health information is maintained within the School Swimming Folder.

It is a requirement that all relevant medical conditions are documented on each school's swimming register and Risk Assessment. Specialist swimming teachers and accompanying school staff must be made aware of all medical information one week prior to that pupil swimming (see Appendix [X](#) - Swimming class registers including information on pupils with medical conditions and/additional needs - information for leisure providers). This will need updating when necessary.

If a pupil experiences a new medical condition during a school swimming lesson, this must be documented in writing by the Teacher in Charge of School Swimming and the Risk Assessment amended accordingly.

School staff should discuss the condition with the Parent/Carer of the pupil and review whether the pupil is able to continue swimming. This will ensure that safe procedures can be put in place before the pupil participates in the next swimming lesson.



Useful links ▶

It is the responsibility of the school to ensure that all medication (including inhalers) is accessible at all times on poolside. A pupil should not be allowed to swim if their medication is not readily available.

Please refer to the Department of Health:

- [‘Guidance on the use of inhalers in schools’](#)
- [‘Guidance on the Use of Adrenaline Auto-Injectors in Schools’](#)

**IMPORTANT  
INFORMATION**

All medication should be placed in a watertight container and be readily available.

Written permission from parents may be required prior to allowing a pupil with a particular medical condition to participate in the School Swimming programme. The school may need to seek help from outside organisations to understand how aquatic activities may affect the pupil. Any concerns surrounding this, please contact [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk)

The requirements for pupils with **Epilepsy** may vary depending on whether an effective medication management regime is in place, the effectiveness of this in controlling the onset of episodes and whether the pupil has a history of episodes whilst swimming. For pupils with Epilepsy, an assigned member of staff will need to be given the role of a ‘spotter’. ***This member of staff needs to be familiar with the pupils’ triggers and medical support plan.***

N.B. This member of staff does not count within staffing ratios on poolside, their dedicated role is to be a spotter of that particular pupil and written into the risk assessment.

# First Aid Arrangements

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

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

In addition to lifeguard provision, there must be a member of staff with an appropriate First Aid qualification on site at all times when the pool is in use. In public pools, this is the responsibility of the pool operator/leisure provider.



**Schools are responsible for reporting all minor incidents themselves when they get back to school. Most schools will keep on-line records so may wish to take copies of the AssessNet form to the pool and then transfer this information. Leisure providers will also have their own procedures for recording and reporting accidents.**

**Accidents/Incidents should be reported to BC via the AssessNet system and if warranted it may require reporting to the Health & Safety Executive (HSE) under the Reporting of Injuries Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR). Appendix [J](#) is an example form, which schools may wish to use.**

# Pool Rules

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

The pool rules should be displayed and explained to all pupils before their first school swimming lesson. Pupils should be reminded at the start of each term and ideally coincide with the emergency procedures when being tested (i.e. alarms). The following are examples of standard pool rules. It is by no means a comprehensive list:

- Pupils must not enter onto poolside unless a lifeguard is present and instructed to do so
- Pupils must not leave the pool without permission, nor return without reporting to the person in charge
- Pupils must remain away from the pool edge until instructed to approach the water
- Pupils must walk, not run on poolside
- Pupils must respond immediately to all instructions
- All those on poolside must understand and respond appropriately to pool emergency procedures for stopping activity and evacuating the pool
- Report any unacceptable, unsafe behaviour that may compromise safety
- No food to be consumed on poolside, including sweets and gum
- No shouting
- No jumping or diving unless instructed to do so\*
- Removing, or making safe, all jewellery
- No outdoor shoes on poolside
- Swim caps must be worn and other hygiene procedures for the pool followed
- Report any illness
- Medication that may be required should be on the poolside

\*The pool's NOP should be checked before [jumping in](#) is allowed, as water may be too shallow. Pool depth needs to be at least 1m.



Useful links ▶

Swim England also provide guidance and resources to support the management of aquatic programmes: [Swim England Facilities Team](#)

**IMPORTANT INFORMATION**

- Only some Swim England Level 2 / STA Level 2 Certificate Swimming Teachers are qualified to teach diving (individuals will need to check if their qualification allows them to do this as some do not)

Refer to the section on Diving – Shallow Entry Racing Dives for further clarification, see page 61.

Swim England has revised the depth of the pool for a racing start - **it is now a minimum of 1.35m**. More information can be found here - [Swim England Racing Starts](#)

# Swimmers with Special Education Needs and/or Disabilities (SEND)

The Equality Act ensures that disabled persons may not be treated less well than any other person. Policies and procedures or physical changes to the environment (reasonable adjustments) may need to be put into place to ensure pupils with disabilities are able to learn to swim. 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.

Adults in the water are only able to supervise the swimmer they are assisting and should **not be counted in the supervision ratios**, although they do count in the bather load (thus pool capacity). Lifeguarding/pool watching duties must be carried out by qualified staff on the side of the pool.

Physiotherapists should have completed a course in managing hydrotherapy activities.

A variety of skills are required stemming from an assessment of each pupil's individual requirements. For schools with hydrotherapy pools, at least two members of staff poolside should have undertaken a minimum of Swim England Support Teacher of School Swimming Certificate.

Staff supporting pupils in the water should work with experienced staff. This induction can take place within or between schools.



## **Adult : pupil ratio**

*"... a safe staff:student ratio can only be determined by carefully examining individual students' abilities, medical profiles and EHCPs in conjunction with relevant medical staff and should not be determined solely in accordance with any swimming-specific written guidelines that may exist. For example, specialist knowledge and care are required when planning for students who are nil-by-mouth or require thickened drinks. These students should never take any pool water into their mouths due to the risk of secondary drowning."*

*(Association for Physical Education, AfPE, 'Safe Practice in Physical Education, School Sport and Physical Activity 2024)*

As a guide, **Swim England recommends a ratio of 8:1 for qualified swimming teachers for high quality provision, with 1:1 support in the water where the RA requires. Ratios for SEND schools will be much lower and individual Risk Assessments are key in determining these ratios (Swim England Safe Supervision).** For school staff who have attended either the Support Teacher of School Swimming or 'Supporting Pupils within SEND during their School Swimming' courses, a ratio of 3:1 is recommended as a guide. All ratios are broken down and explained on page 55.

# Hydrotherapy Pools

Water-based activity in hydrotherapy pools requires higher levels of supervision, often on a one to one basis in the water. Individual pupils' medical profiles and health care plans need to be examined, alongside relevant medical staff in order to arrive at safe ratios.

Hydrotherapy pools in Special Schools need to pay particular attention to the development of risk-management schemes for:

- Moving and handling, which includes all aspects of lifting and carrying of pupils or transfers between equipment, such as in and out of wheelchairs
- Transporting pupils between changing rooms and the pool
- Entry and exit from the pool
- Dressing/undressing areas and support staff
- Emergency equipment and procedures for pupils with disabilities/spinal injuries
- Pool accessibility (i.e. ramps, hoists and changing facilities)
- Increased Teacher : Pupil ratio
- Pool temperature may be set higher for disabled swimmers (e.g. 32 degrees C for Special needs school pools)
- Assistant/helper in the water

## Training Staff in Hydrotherapy Pools/Special School Pools

BSSP in conjunction with BC are able to offer courses aimed at school staff who support pupils with sensory and physical needs during their school swimming lessons. For more information contact [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk).

School Teachers **supporting the delivery** of lessons to SEND pupils need to undertake training in either the *Swim England SEND School Swimming* or *Support Teacher of School Swimming*, see pages 49-50. They may then work under the guidance of a qualified Swim England Level 2 Swimming Teacher.

Staff working with individual pupils in the water will also need to be appropriately trained (again the SEND School Swimming Course is an appropriate qualification); they will also need to have handling expertise and sufficient knowledge of each individual pupil's physical and medical needs.



Ratios for Special Schools will be much lower and Individual Risk Assessments are key in determining these ratios. There need to be a minimum of 2 members of trained School Staff on poolside (minimum requirement STOSS) in every lesson. For further guidance please visit [Swim England Safe Supervision](#)

## Hoists

In school pools, staff must follow the manufacturer's instructions in the use of pool hoists, ensure they receive the appropriate training for its use before using it with a pupil and ensure it has a regular (as per the manufacturer's instructions) safety check.

Both at leisure provider pools and school pools, where the hoist uses a sling, the swimmer needs to provide their own sling appropriate to their weight, as this is a personal piece of equipment thus not shareable.

## Swim England SEND Course for School Staff

Overview of course (5-6 hours)	
1	Improve understanding of SEND and inclusion in the National Curriculum and Physical Education, specifically Swimming
2	Swimming and Water Safety in the National Curriculum and adaptations where required
3	Identify good practice in health and safety
4	Understand barriers to swimming and Identify strategies to overcome these for pupils with SEND
5	Identify methods of communication and resources to support pupils with SEND
6	Understand fundamental movement skills and core aquatic skills and the links between them
7	How to develop water confidence using core aquatic skills
8	How to introduce the swimming strokes

For more information, or to book the above course, please email [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk).

## Lifeguarding in a Special School Hydrotherapy Pool

The lifeguarding qualification required for hydrotherapy pools is the RLSS UK Aquatic Therapy Shallow Pool Rescue Award (ATSPRA). Other scenarios are listed below:

SPECIAL SCHOOL POOL		
Situation	Lifeguarding Qualification Needed	Information
In a Special School pool or hydrotherapy pool with shallow water (less than 1.2m) during a programmed session	<p><b>Minimum qualification:</b> RLSS National Rescue Award for Swimming Teachers and Coaches (NRASTC)</p> <p>or</p> <p>RLSS Aquatic Therapy Pool Rescue Award (ATPRA) for Swimming</p>	<p>The ATPRA is a pool supervision and rescue award for aquatic therapists and support workers working during programmed activities. It is suitable for those working in a variety of pools, including where the water is deeper than your standing depth.</p> <p>If the facility has qualified lifeguards or first-aiders available to respond quickly to a therapist or support worker in an emergency, you could consider an ATPRA LIGHT qualification</p>
In a school pool with deep water (over 1.2m) during an un-programmed session	<p><b>Minimum qualification:</b> RLSS National Rescue Award for Swimming Teachers and Coaches (NRASTC)</p>	<p><b>Un-programmed sessions are prohibited for School Swimming due to their unpredictable nature</b></p>
In a school pool with deep water (over 1.2m) during an un-programmed session	<p><b>Minimum qualification:</b> RLSS National Pool Lifeguard Qualification (NPLQ)</p>	<p><b>Un-programmed sessions are prohibited for School Swimming due to their unpredictable nature</b></p>

In a school pool with shallow water ( <b>less than 1.2m</b> ) during an <b>un-programmed</b> session (for example, if the pool is hired as an external booking)	<b>Minimum qualification:</b> RLSS National Pool Lifeguard Qualification (NPLQ)	<b>Un-programmed sessions are prohibited for School Swimming due to their unpredictable nature</b>
-----------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------

**Please note:** The guidance above states the minimum provision required by Buckinghamshire Council and the Bucks School Swimming Partnership. In all circumstances, schools should also refer to the pool's NOP as more advanced qualifications may be needed after a risk assessment.

**If lifeguard or First Aid backup is not available on poolside, the standard NRASTC should be used. In all cases, in a school pool, if the minimum one NRASTC is used, there should be an additional member of staff trained to NRASTC LIGHT level either at the pool or very close by.**



School staff will be responsible for ensuring that they keep a record of their swimming qualification and where relevant, lifeguard qualification expiry dates, both individually and in the School Swimming Folder, and must undertake a one-day refresher course prior to expiry of the qualification. Lifeguards will only be able to work in a pool where they are qualified to the pool's maximum depth.

# Diversity & Inclusion

Swim England provided a range of tools and resources to help schools, lesson providers and pool operators make sure their swimming programmes are fully inclusive. Despite the programme finishing, these should still be helpful to schools and can be found on the BSSP website and available here - [Swim England Inclusion Hub](#)

As well as the PE and Sport Premium for primary schools, which provides funds to support schools in delivering inclusive sport, the Government provides helpful guides and policy documents for organisations who work with pupils who have SEND and/or high needs. The [SEND Code of Practice: 0-25 years](#) also provides helpful advice.

Swim England have now launched a CPD for all staff working with pupils with additional needs during their school swimming lessons. Please contact [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk) for further information and to book onto this course with the Bucks School Swimming Partnership.



Useful links ▶

## Further additional information can be found at;

- Swim England: [SEND School Swimming guidance documents](#)
- Swim England [Inclusion Guidance](#)
- Swim England [EAL - Learn to Swim Flashcards](#)
- Halliwick: [www.halliwick.org](http://www.halliwick.org)

# School Staff Accompanying Pupils to their School Swimming and Water Safety Lessons

For all school swimming and water safety lessons, at least **two members of school appointed staff**, who know the pupils, should accompany the class to the swimming pool (this applies to both school pools and leisure provider pools). **At least one of these should be the class teacher.** Primary School Teachers should accompany their own class to swimming, whenever possible, as they know their pupils in a unique way. There should always be someone on the poolside who knows the specific medical or additional needs of the pupils.



**To clarify; in addition to trained specialist swimming teachers, there should be two members of school staff on poolside who are suitably qualified, confident and competent. Staff must hold, as a minimum, the Swim England Support Teacher of School Swimming Certificate.**

Please refer to the section on Teaching Qualifications, page 49 along with the overview of the Swim England National Curriculum Training Programme for teaching School Swimming on page 50.

**“Teachers and TAs should not just observe in lessons which are being outsourced – they should be active participants in the lesson and contribute to helping pupils achieve curriculum goals.”**  
*Ofsted’s PE Research Review for Teachers and Leaders (Physical Education) March 2022*

All school staff accompanying pupils to swimming lessons should:

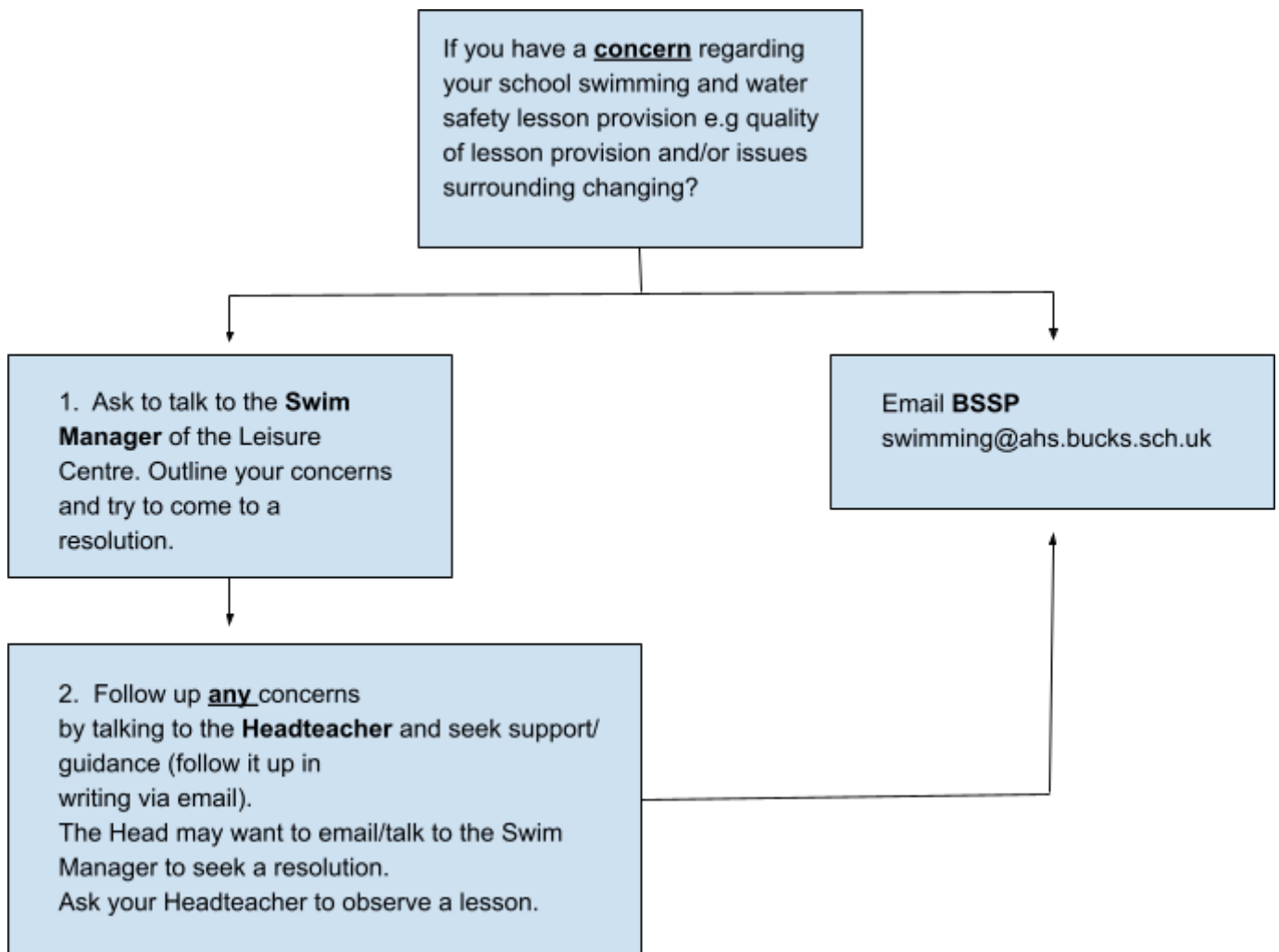
- Understand what their qualification enables them to do
- Ensure that their qualifications are kept up to date and are refreshed when required
- Make it clear what standard of swimmer they are confident to teach
- Understand the limits of the role
- Be confident on poolside
- Demonstrate good knowledge and be able to communicate this clearly to the pupils
- Follow their school Behaviour Policy, ensuring good discipline of the pupils
- 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 (NOPs) and emergency action plan (EAP)
- Be suitably dressed for the role they are to play in the lesson
- Adapt their approach to suit the needs of different pupils
- Ensure they maintain a good teaching position at all times - this often means having to move frequently to overcome anything that makes visibility difficult (e.g. glare, shadow, sunlight)
- Not enter the water without leaving a lifeguard/lifesaver and a qualified member of school staff on the poolside
- Not exceed the recommended teacher:pupil ratio arrived at through a risk assessment of each group
- Maintain good relationships with the pool operators and aquatics teachers, ensuring that communication is effective in ways that benefit the pupils, and their roles and responsibilities regarding water safety cover remain clear and understood

*(Based on Safe Practice: in Physical Education, School Sport and Physical Activity 2020 Edition)*



**Accompanying school staff need to work in partnership with specialist swimming teachers. The Partnership Agreement helps them to do this.**

# Communication Chain



## IMPORTANT INFORMATION

For schools with their own pools, it is highly recommended that staff also undertake the Swim England Teacher of School Swimming, which completes the Swim England National Curriculum Training Programme.

The names and dates of staff trained should be kept in the School Swimming Folder (BSSP holds a Database for all trained staff). Where individuals hold qualifications gained from other providers, they **must** submit copies of certificates to the BSSP Swimming Team.

# Swimming Teacher Position

The specialist swimming teacher and school staff in charge of the group should be **teaching from the side of the pool** where the whole group can be seen and from where feedback can be given on the performance of each pupil in the group.

There may be some circumstances in which it is appropriate for the school teacher or a classroom assistant to be in the water supporting individual pupils (as an additional person). This would be the exception rather than the rule and only following a careful **risk assessment** by the swimming teacher. It should include potential factors such as:

- Depth of water
- Pupil ability
- Use of aids
- Size of pool
- Number and age of pupils
- Lifeguarding arrangements



The teacher or member of staff in charge of a group must ensure that, at all times, they can see all the pupils and NEVER turn their back on a group, or position themselves so that pupils are behind them.

When teaching or instructing non-swimmers or weak swimmers in underwater swimming or activity the specialist swimming teacher of the group 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 (depending on the level of risk). When an additional person is in the water assisting, they must be aware of the NOP and School Safeguarding Policy. Also, refer to the section on Safeguarding see page 76. This will not compromise ratios on poolside.

If there is glare on the surface of the pool and the bottom of the pool cannot be clearly seen, it may be necessary to rope off the area or cover the window (indoor pool only) letting in the light. It may be that repositioning themselves will allow staff to see the bottom of the pool clearly. If this is still not possible, swimming should cease.

## Teaching in the Water

It is recognised that in some circumstances the pool operator or teacher/provider will have to assess the risk and may feel it is more appropriate to teach in the water. This practice should only be considered after carrying out a risk assessment giving careful consideration to all the following factors:

- Pool depth
- Ability of learners
- Age of learners
- Use of flotation aids and lifesaving support
- The teacher can clearly see all learners at all times and be close enough to provide appropriate manual support if required

In this way, ratios may need to be reduced to ensure safety and effective teaching. Ratios above this should not be considered unless additional helpers are in the water.

For additional information, please see the following links and Swim England [Safe Supervision](#) and Swim England Guidance on Worker Health and Safety - [here](#)



In some cases, leisure centre staff hold both a swimming teaching qualification and a NRASTC, this is the only reason why there may not be a lifeguard on poolside.

If you are in any doubt, please speak to your leisure provider and Swim Manager. Alternatively, please email [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk)

## Supporting pupils in the water

Supporting pupils through physical contact can be helpful to their progress and, depending on the situation, can be beneficial to their confidence and understanding of swimming and water safety.

Further to this, the **school** should safeguard all by doing the following:

- The school must ensure that if a member of staff is supporting in the water that they are **suitably qualified** and has the relevant **DBS checks**
- The school should work with **parents/ carers/ pupils** to understand the best method of support (if for example, the pupil has swimming lessons outside of school and is supported in the water)
- The school should **email** the relevant pupils' parents/ carers to gain consent, within this, explain that manual guidance might be used to support the pupil(s)
- To demonstrate appropriate safeguarding techniques it is best practice to keep hands where they can be seen at all times and support by offering a flat, open palm, back of the hand or by using floatation/teaching equipment. Support should only be delivered using the following positions; hands, shoulders and head. Swimming equipment and/or aids are encouraged to facilitate this process
- The pupils should always be treated with empathy and asked if they are happy for support using physical contact. If they say 'no', or are not comfortable with this teaching practice, you will need to find an alternative method of support
- This should be identified within the **Risk Assessment** and agreed with all (including the Head teacher) prior to the School Swimming Programme commencing
- In regard to ratios, with a member of staff supporting in the water, there must always be at least **two qualified members** of school staff present on the poolside during the swimming lesson

**IMPORTANT  
INFORMATION**

- [Swim England Best Practice \(Holds and Clothing\)](#)

- The member of school staff in the water should be easily recognisable by, for example, wearing a bright t-shirt and shorts
- The personal space of the learner should not be infringed - the member of school staff in the water should be aware of familiarity that may come from pupils

# Teaching Qualifications Required for School Staff

Staff accompanying pupils to their School Swimming lessons need to undertake training to ensure they are confident and competent on poolside. The table below explains the requirements:

Minimum requirements	Qualification
For all staff accompanying their pupils school swimming at a <u>leisure provider pool</u>	Swim England Support Teacher of School Swimming
For staff teaching swimming at their <u>own shallow tank pool</u> without a Swim England Level 2 or equivalent	Swim England Support Teacher of School Swimming <i>(Formerly ASA NCTP Fundamentals of School Swimming)</i>
Highly recommended for staff teaching swimming at their <u>own shallow tank pool</u> without a Swim England Level 2 or equivalent	Swim England Teacher of School Swimming <i>(Formerly ASA NCTP Aquatic Skills of School Swimming)</i>
For Secondary PE teachers teaching in a school pool deeper than 1.2m with a qualified Swim England Level 2 or equivalent	Please contact BSSP on <a href="mailto:swimming@ahs.bucks.sch.uk">swimming@ahs.bucks.sch.uk</a>
For Staff teaching swimming in hydrotherapy pools at Special Schools or as part of SEND Swimming need training	<b>(New) Supporting pupils with SEND during School Swimming</b> or Swim England Support Teacher of School Swimming
<b>Swim England recommends completion of both Support Teacher and Teacher of School Swimming courses.</b>	



Useful links ▶

For further information and course flyers, please visit the [BSSP website](#)



The holder of Swim England Stage 1; Support Teacher of School Swimming may work under the guidance of a specialist swimming teacher to actively support and assist.

The holder of Swim England Stage 2; Teacher of School Swimming will be qualified to plan & evaluate session plans in line with NC and teach independently within a school swim programme alongside at least one other at a shallow tank pool, 1.2m or below. However, at leisure provider pools, they will need to work alongside a qualified Level 2 Swimming Teacher.

# Swim England

## National Curriculum Training Programme

### Certificate for Teaching School Swimming

The table below explains the Swim England CPD courses' content and overview

CPD - Support Teacher and Teacher of School Swimming	
<p>The programme is made up of two courses, which use both theory and practical sessions to teach you the most effective ways of delivering school swimming for success.</p> <p>The course includes practical elements. Candidates must be confident in water and able to swim 25m</p> <p><b>Stage 1; Support Teacher of School Swimming</b> (6 hour course - 6 CPD Points)</p> <p>Once completed the holder will be able to actively assist and support a more qualified teacher in line with the swimming lesson provider's risk assessment.</p> <p><b>Stage 2; Teacher of School Swimming</b> (9 hour course with pre-course preparation required - 9 CPD Points)</p> <p>The course includes an Observation of Candidates teaching pupils (or if this is not possible, each other) Once completed the holder will be qualified to plan and evaluate session plans, whether working towards, meeting or exceeding the national curriculum. They will be able to teach independently or support a specialist swimming teacher in a school swimming programme, in line with the swimming lesson providers risk assessment.</p>	
CPD FOR SPECIAL SCHOOLS - Supporting pupils with SEND during School Swimming (5-6 hour course)	
<ol style="list-style-type: none"> <li>1</li> <li>2</li> <li>3</li> <li>4</li> <li>5</li> <li>6</li> <li>7</li> <li>8</li> </ol>	<ul style="list-style-type: none"> <li>1 Improve understanding of SEND and inclusion in the National Curriculum and Physical Education, specifically Swimming</li> <li>2 Swimming and Water Safety in the National Curriculum and adaptations where required</li> <li>3 Identify good practice in health and safety</li> <li>4 Understand barriers to swimming and Identify strategies to overcome these for pupils with SEND</li> <li>5 Identify methods of communication and resources to support pupils with SEND</li> <li>6 Understand fundamental movement skills and core aquatic skills and the links between them</li> <li>7 How to develop water confidence using core aquatic skills</li> <li>8 How to introduce the swimming strokes</li> </ul>

All candidates will receive invaluable resources, including the NCTP Learner Guide and National Curriculum Activity Cards. (Candidates will be registered with Swim England, recorded on the BSSP Database and will receive certificates).

**Swim England advises that school staff should refresh or upskill their training within a 5 year period. Please see page 47 for the recommended pathway of training.**



For details on all of the above courses, or to book a place, please contact BSSP via email - [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk).

[BSSP Course Information](#)



## BSSP SECONDARY CPD

### BSSP Secondary Teacher of School Swimming

The course includes an Observation of Candidates teaching pupils (or if this is not possible, each other)

- Statutory requirements for swimming and water safety in the National Curriculum
- Good practice with regard to health and safety in a school swimming programme
- Roles, responsibilities and relationships related to the delivery of swimming in schools
- Organisation of the learning environment
- Development of water confidence using the core aquatic skills
- Introduction to the swimming strokes
- Skills appropriate to those working at the improver and more advanced level (drills)
- Technical aspects related to the four strokes – i.e. stroke analysis
- Faults and causes and progressive practices to bring about improvement
- Key skills for school swimming that meet National Curriculum attainment targets for KS3/4 PE (including Water Polo and Artistic Swimming)
- Key considerations when developing a Swimming lesson plan
- Creation of session plans for the delivery of swimming lessons and delivery of these
- Key aspects of communication in relation to delivery – feedback, questioning and skill development
- Reviewing the effectiveness of planning and delivery to improve participant progression

## Swimming at Secondary School

For many students, learning to swim is a key part of growing up. Swimming ability often leads to a lifetime of participation in other water-based activities. If a young person does not learn to swim in primary school, they often feel excluded or unable to take part in other activities such as educational visits, outdoor pursuits, swimming on holiday and career aspirations. Many students leave primary school unable to meet the key Stage 2 requirements for school swimming and water safety. Key Stage 3 is an opportunity to teach and reinforce the skills taught at primary school. Swimming lessons are also an opportunity to introduce other activities and disciplines such as artistic swimming, water polo, diving, open-water swimming and Rookie Lifeguard (where staff are qualified to deliver these aspects).

*(AfPE, 'Safe Practice in Physical Education, School Sport and Physical Activity 2024')*

# Course Names and Equivalents

Since its release, the National Curriculum Training Programme has undergone progressive change in both content and name. The table below may be helpful to school staff to check existing qualifications:

Date of review	Qualification title		
2008 ↓	ASA Module 1 NCTP	ASA Module 2 NCTP	
2014 ↓	ASA Fundamentals of School Swimming	ASA Aquatic Skills of School Swimming	
2018 ↓	Swim England Support Teacher of School Swimming (Primary or Secondary option)	Swim England Teacher of School Swimming (Primary or Secondary option)	
2023	Swim England Support Teacher of School Swimming	Swim England Teacher of School Swimming	Swim England Supporting pupils with SEND during School Swimming - <b>New Adapted course for Special Schools</b>

## Please note when referring to courses completed by your staff:

### Completed through BSSP

**Stage 1 (8 hour course)** Swim England Support Teacher of School Swimming course

**Stage 2 (9 hour course + 1 hour pre-course reading)** Swim England Teacher of School Swimming course **Completed through Swim England (or equivalent).**

**Leisure centre staff should hold these qualifications (and school staff may aspire to achieve):**

SEQ Level 1 Swimming Assistant - to find out more information click [here](#)

SEQ Level 2 Swimming Teacher - to find out more information click [here](#)

# School Swimming Teaching Scenarios

The table below shows the training requirements for school staff for a range of different school pools

School pool ( <u>shallower than 1.2m</u> )		
Required Qualification for School Swimming	Who for?	What does this qualify me to do? / Additional Information
<p><b>Minimum</b> Swim England Support Teacher of School Swimming (6 hour course) delivered by Swim England Licensed BSSP staff.</p> <p><b>Please note: at least one member of staff on poolside will also need to hold the RLSS UK NRACTC supervision and rescue qualification - this may also be one of the holders of Support Teacher of School Swimming.</b></p>	<p>At least 2 members of school staff (Teachers, HLTA's +TA's) must hold a current Swim England Stage 1; Support Teacher of School Swimming Course</p>	<p>This is the minimum requirement for school staff to deliver <u>school</u> based school swimming lessons providing:</p> <ul style="list-style-type: none"> <li>• At least 2 members of swimming qualified staff are on poolside</li> <li>• The group should be no more than 20 pupils or the maximum bather capacity for the pool (found in NOP)</li> <li>• <b>It is strongly recommended that schools with their own pools also qualify their staff to the Swim England Stage 2; Teacher of Swimming.</b> <ul style="list-style-type: none"> <li>• <b>“Support Teacher of School Swimming</b> – once completed the holder will be able to actively assist and support a more qualified teacher in line with the swimming lesson provider's risk assessment.”</li> <li>• <b>“Teacher of School Swimming</b> – once completed the holder will be qualified to plan and evaluate session plans, whether working towards, meeting or exceeding the national curriculum. They will be able to teach independently or support a specialist swimming teacher in a school swimming programme, in line with the swimming lesson provider's risk assessment.”</li> </ul> </li> </ul> <p>(Swim England 2025)</p>

**Primary School Staff using a private school pool or leisure provider pool  
(deeper than 1.2m)**

<p>At least 1 Swim England Level 2 Certificate for Teaching Aquatics or STA Level 2 Certificate in Swimming Teaching</p> <p>They must be <u>supported</u> by a minimum of 2 members of school staff trained to a minimum level of Support Teacher of School Swimming (6 hour course) delivered by Swim England Licenced BSSP staff</p> <p><b>(please refer to Lifeguarding Section, page 62 for required lifeguarding qualifications)</b></p>	<p>School or leisure provider staff</p> <p>School staff (teachers, HLTA's + TA's)</p>	<p>Work with an absolute upper limit of 20:1 - see <a href="#">Swim England Safe Supervision Guidance Aug 2024 on ratios for qualified specialist swimming teachers</a>. Ratios should be predetermined in the Risk Assessment.</p> <ul style="list-style-type: none"> <li>● <b>“Support Teacher of School Swimming</b> qualified staff to actively assist and support a more qualified teacher in line with the swimming pool and school’s risk assessment.”</li> <li>● <b>Teacher of School Swimming</b> – once completed the holder will be qualified to plan and evaluate session plans, whether working towards, meeting or exceeding the national curriculum. They will be able to teach independently or support a specialist swimming teacher in a school swimming programme, in line with the swimming lesson provider's risk assessment.”</li> </ul> <p>(Swim England 2025)</p>
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**Special School Staff or those working with pupils with additional needs in their own hydrotherapy pool or a leisure provider pool**

<p>At least 1 Swim England Level 2 Certificate for Teaching Aquatics or STA Level 2 Certificate in Swimming Teaching</p> <p>They must be <u>supported</u> by a minimum of 2 members of school staff trained to a minimum level of Support Teacher of School Swimming (6 hour course) <b>or Swim England</b> ‘Supporting pupils with SEND during School Swimming’ delivered by Swim England Licenced BSSP staff</p>	<p>Qualified school staff or external qualified swimming teachers</p> <p>School staff (teachers, HLTA's + TA's)</p>	<p><b>For qualified swimming teachers: 8:1 with 1:1 support</b> in the water where required</p> <p>Ratios for Special Schools will be much lower and Individual Risk Assessments are key in determining these ratios. Where school staff hold either the Support Teacher of School Swimming or Supporting Pupils with SEND during their school swimming a small group is recommended. Support will need to be determined through each pupil’s</p>
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(please refer to Lifeguarding Section, page 62 for required lifeguarding qualifications)		EHIC and from the <a href="#">Swim England Safe Supervision Guidance Aug 2024</a>
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**Secondary School PE teachers with a pool (deeper than 1.2m)**

<p>Secondary PE Degree PGCE or Equivalent <b>with:</b></p> <p>Minimum requirement BSSP Teacher of School Swimming Secondary Course (15 hour course - pre-reading plus one day course) <b>(please refer to Lifeguarding Section, page 62 for required lifeguarding qualifications)</b></p>	<p>Alongside Swim England Level 2 qualified swimming teacher</p> <p>Alongside another BSSP Teacher of School Swimming qualified PE Teacher</p>	<p>Must adhere to Swim England Ratio guidelines i.e. absolute upper limit <b>20:1</b>. Ratios should be predetermined in the Risk Assessment and from <a href="#">Swim England Safe Supervision Guidance Aug 2024</a></p> <ul style="list-style-type: none"> <li>At least 2 qualified members of staff should be on poolside</li> </ul>
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**Considerations -**

Schools, school swimming lesson providers and operators must fully risk assess their school swimming provision to identify the maximum ratios for a particular lesson. Ratios will change depending on the risks of the lesson. The risk assessment will take into account the level of safe supervision (lifeguard cover) the design of the facility, the age, ability and understanding levels of pupils, SEND considerations, the knowledge and experience of staff and any other considerations.



For course outlines or to book onto courses, please contact Bucks School Swimming Partnership via [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk) or call the BSSP Team on 01296 388222.



Schools using leisure providers **must work in partnership** to assist the qualified specialist swimming teachers, within the ratios outlined by Swim England (see above). Where Teachers and TAs/HLTA's are both involved in lessons, pupil:teacher ratios can be significantly reduced (low ratios are key for safety in swimming) within Swim England teacher pupil ratios.



Where school staff are absent or a school does not have two appropriately qualified members of staff to accompany the pupils to school swimming, they must not send unqualified staff, supply staff or trainee teachers.

Please contact the Bucks School Swimming Partnership via [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk) to discuss any alternative scenarios/options to ensure the pupils' safety at all times, that may not have been mentioned above.

## Keeping Qualifications up to date

As with all qualifications, it is strongly recommended that all staff keep themselves updated and upskilled. Swim England recommends a **5 year renewal** for the above courses. One of the reasons for this is that Good Practice can change from time to time, e.g. recommended ratios; technicalities for swimming strokes etc. The options for school staff to update and upskill are set out below (in ranked order):

Course Title	<u>Within 5 Year Renewal Period</u>	<u>Outside 5 Year Renewal Period</u>
<b>Stage 1 Support Teacher of School Swimming</b>	Progress on to Stage 2; Teacher of School Swimming	Undertake Stage 1; Support Teacher of School Swimming
<b>Supporting pupils with SEND during School Swimming</b>	Progress on to Stage 2; Teacher of School Swimming	Undertake 'Supporting pupils with SEND during School Swimming'
<b>Stage 2 Teacher of School Swimming</b>	Undertake Stage 2; Teacher of School Swimming	Undertake Teacher of School Swimming or Support Teacher of School Swimming to refresh knowledge



All lifeguarding or lifesaving courses have a minimum 2 year revision requirement or the option to refresh training on a regular basis.

**It is the school's responsibility to ensure that lifeguard qualifications are kept up to date.**

Please see section on Lifeguarding page 62 and refer to the RLSS UK for further information.

# Ratios for Swimming Teachers

## Swim England Safe Supervision Guidance

The building design of swimming pools vary greatly as do specific circumstances, thus each class will be very different. Therefore, definitive sets of ratios are not always appropriate.

For example, shallow-depth learner pools are much easier to supervise than large public pools where the presence of public swimmers can present problems. The starting point for any such policy should be the completion of a thorough Risk Assessment based on:

- Numbers of 'qualified staff'
- Numbers of 'non-qualified' adult helpers who are on poolside in a supervisory/spotting role
- Pupil ability
- The facility, including water depth and un-programmed activities taking place at the same time
- Pupil behaviour
- Pupils with additional needs and disabilities

Please talk to your leisure provider who should be happy to advise on the Risk Assessment.

Teacher : Pupil ratios (not to be confused with bather capacity) will be found in the pool's NOP and will be based on risk assessments.



**Irrespective of the Teacher : Pupil ratio, there must always be at least 2 qualified members of school staff present on the poolside during the swimming lesson.**

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

Occasionally, specialist swimming teachers will request a dedicated named person to provide additional support for an individual pupil who has particular health and safety need/s whilst swimming. Sometimes this person is referred to as a "spotter". If spotters are in the water, they become a participant and should be included in the numbers under the supervision of the specialist swimming teacher. They will be additional to the Swim England Teacher of School Swimming trained staff.

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

Additional school accompanying staff, **swimming teacher assistants or support teachers, who may be in the water to aid a pupil, do not count towards the Teacher : Pupil ratio**, but do count towards bather capacity numbers. They also need to be fully aware of their role and understand relevant aspects of both NOP and EAP.

# Guidelines from Swim England for Teacher : Pupil Ratios

The ratios outlined below are guidelines set by Swim England for swimming teachers holding a Swim England/ASA Level 2 Certificate for Teaching Swimming/Aquatics Qualification. These ratios should only be used for guidance when writing risk assessments. Normal Operating Procedures and Emergency Action Plans and other factors need to be taken into account, including:

- The competency and experience of the swimming teacher
- Lifeguard provision (if the Teacher is also taking on the role of the Lifeguard)
- Design of the pool
- Ability of the pupils

The school Risk Assessment needs to consider ratio requirements and whether the safety of the session and quality of teaching would be enhanced by assigning additional staff to teach smaller groups or carry out monitoring roles such as head-counts or watching for signs of pupils tiring.

## The following applies to Level 2 Swim England (or equivalent) Swimming Teachers:



Please pay particular attention to the **bold** type sections below when writing your Risk Assessments and jointly planning with your leisure providers. **Also refer to the [Swim England Safe Supervision Guidance Aug 2024](#).**

Ability / age / activity	Baseline Learner / Teacher Ratios	Quality Delivery
<b>Non Swimmers and beginners - young children</b> , normally primary school age, being introduced to swimming who are <b>unable to swim 10 metres unaided on back or front.</b>	<b>12:1</b>	<b>8:1</b>
<b>Pupils under the age of seven</b> - Irrespective of their swimming ability, group size should be restricted.	<b>12:1</b>	<b>8:1</b>
<b>Improving swimmers</b> - Swimmers of a similar ability to each other who <b>can swim at least 10 metres competently and unaided on their back and on their front.</b> It is recommended that the lesson be <b>confined to an area in which the pupils are not out of their depth.</b>	<b>20:1</b>	<b>12:1</b>
<b>Mixed ability groups</b> - Pupils with a range of abilities (from improving to competent) where the <b>least able and least confident are working well within their depth.</b> Swimmers techniques, stamina and deep-water experience should be considered. <b>They should not include beginners.</b>	<b>20:1</b>	<b>12:1</b>
<b>Competent swimmers</b> - Those swimmers who can swim <b>at least 25 metres competently and unaided on front and back, and can tread water for two minutes.</b>	<b>20:1</b>	<b>15:1</b>

<p><b>Swimmers with disabilities - each situation must be considered individually.</b> Care must be taken to ensure that there are sufficient helpers in the water to provide a <b>1:1 ratio for those needing constant support</b>, and a sufficient number of other helpers to provide the degree of support required by the range of disabilities within the group.</p>	<p><b>8:1 with 1:1</b> support in the water where required</p>	<p><b>6:1 with 1:1</b> support in the water where required</p>
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The absolute upper limit for a qualified Swim England Level 2 (or equivalent) Teacher in School Swimming is 20:1 (owing to the likely mixed ability of the group). **It is emphasised that this will need to be lower depending on the Risk Assessment;** e.g. age, ability, additional needs and where schools are taking pupils who are beginners or unable to swim 10m unaided on their front and back (see previous page).

For example, where schools are taking pupils who are beginners, unable to swim 10m unaided on their front or back, **which is often the reality**, the ratio becomes 12:1 (ideally a maximum of 8:1) and schools will therefore need to employ additional qualified swimming teachers to work safely within these ratios. As an example, where schools take more than 20 pupils swimming; e.g. a class of 30 pupils, the above applies and they will require:

1. A minimum of; 2 Swim England Level 2 qualified swimming teachers and 2 school staff members with the Swim England Stage 1 Support Teachers of School Swimming qualification
2. Depending on Risk Assessment, there may be a requirement to employ more qualified swimming teachers and/or bring more school staff (trained or as additional ‘spotters’).

Leisure provider pools work within the above national governing body ratio guidelines. The Bucks Safe Practice in School Swimming Policy requires school staff with the Swim England Stage 1 Support Teacher of School Swimming Certificate to assist leisure provider qualified swimming teachers (whilst still working under the above ratios and the guidance of the Level 2 Swimming Teacher).

## Ratios for School Staff

**Stage 1; Support Teacher of School Swimming** – once completed the holder will be able to actively assist and support a more qualified teacher. Candidates can then progress to the second training programme.

**Stage 2; Teacher of School Swimming** – once completed the holder will be qualified to plan and evaluate session plans in line with the national curriculum, and teach independently in a school swimming programme.



It is strongly recommended that schools with their own pools qualify their staff to Swim England Teacher of School Swimming.

Pool operators have a responsibility for the safety of all who use their pools. Whenever pupils swim, there must be someone present with appropriate lifeguarding/lifesaving, rescue and first aid skills.

*It is the responsibility of the pool operator to ensure that there are enough lifeguards and that they are competent, effectively organised and diligent in their duties. This should be addressed in the risk assessment and also includes assessing whether hirers of pools have made effective and safe arrangements for supervision (HSG179, Health & Safety in Swimming Pools 2018).*

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

Following the Risk Assessment, in a shallow tank pool, a minimum of one member of staff with the RLSS UK NRASTC/NRASTC LIGHT\* will be required, whilst in a pool over 1.2m, you must have two. In both cases, you will require staff with appropriate teaching qualifications (refer to above section).

(\*only appropriate if there is a NPLQ qualified lifeguard or First Aider on poolside)

If fully qualified (to Swim England Level 2), in a school pool over 1.2m where the NOP allows, a swimming teacher can also be responsible for lifeguarding/lifesaving if they hold an appropriate lifeguarding qualification, when assisted by an additional qualified person (e.g. Swim England Secondary Teacher of School Swimming) who also holds an appropriate lifeguarding qualification.



**A swimming teacher who is also responsible for lifeguarding/lifesaving should not work alone. There must be at least one leisure provider lifeguard present at all times during planned school lessons. The risk assessment should inform the number of lifeguards required.**

***There should never be only one pair of 'qualified eyes' (e.g. a qualified Swim England Level 2 or equivalent Swimming Teacher or qualified lifeguard) on poolside. Whilst teachers have organisational and teaching experience, along with knowledge of their pupils, most will have 'unqualified eyes' in terms of spotting pupils in difficulty in the water. The swimming pool is a totally different environment from school settings. Therefore, if the Swimming Teacher is also the lifeguard, there should be an additional qualified Swimming teacher on poolside.***


Lifeguards must never leave the poolside unattended and always secure the poolside against unauthorised access. They must remain alert and be facing the pool at all times. All lifeguards, lifesavers and supporting staff need to:

- Ensure they regularly practise and renew their lifesaving and water safety skills and keep qualifications up to date,
- Remain diligent and effectively organised throughout an aquatic session,
- Understand the pool NOP and EAP,
- Ensure clothing is appropriate to their role to enable prompt response without restriction in the event of an incident.



## Lifeguarding Qualifications & Provision for School Swimming

<b>PUBLIC POOL</b>	
<b>Situation</b>	<b>Lifeguarding Qualification Needed (This will usually be provided by the leisure provider)</b>
In a public pool, for <b>structured lessons e.g. School Swimming</b>	<p>RLSS UK National Pool Lifeguard Qualification (NPLQ) or STA Pool Lifeguard Qualification <b>or</b></p> <p>RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC) <b>or</b></p> <p>RLSS UK National Rescue Award for Swimming Teachers and Coaches LIGHT (NRASTC), <b>where a NPLQ lifeguard or First Aider is present</b></p>
<b>SCHOOL POOL</b>	
In a school pool with <b>deep water (over 1.2m)</b> during a <b>programmed</b> session	<p><b>Minimum qualification:</b> RLSS UK National Pool Lifeguard Qualification (NPLQ) <b>or</b></p> <p>RLSS UK Rescue Award for Swimming Teachers and Coaches (NRASTC) or STA Pool Lifeguard <b>or</b></p> <p>RLSS UK National Rescue Award for Swimming Teachers and Coaches LIGHT (NRASTC), <b>only where a NPLQ lifeguard or First Aider is present</b></p>
In a school pool with <b>deep water (over 1.2m)</b> during an <b>un-programmed</b> session; <b>(for example, if the pool is hired as an external booking)</b>	<p><b>Minimum qualification:</b> RLSS UK National Pool Lifeguard Qualification (NPLQ)</p>
In a school pool with <b>shallow water (less than 1.2m)</b> during a <b>programmed</b> session	<p>RLSS UK National Pool Lifeguard Qualification (NPLQ) <b>or</b></p> <p>RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC) <b>or</b></p> <p>RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC) LIGHT, <b>only where a NPLQ lifeguard or First Aider is present</b></p>
In a school pool with <b>shallow water (less than 1.2m)</b> during an <b>un-programmed</b> session <b>(for example, if</b>	<p><b>Minimum qualification:</b> RLSS UK National Pool Lifeguard Qualification (NPLQ)</p>

the pool is hired as an external booking)	
In a Special School pool or hydrotherapy pool with <b>shallow water (less than 1.2m)</b> during a <b>programmed</b> session	RLSS UK National Pool Lifeguard Qualification (NPLQ) <b>or</b> RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC) <b>or</b> RLSS UK Aquatic Therapy Pool Rescue Award for Swimming (ATPRA)
<p><b>NRASTC LIGHT</b></p> <p>NRASTC LIGHT is a supervision and rescue award for Swimming Teachers, coaches and/or instructors working during programmed activities, such as swimming lessons when lifeguard or First Aid backup is available to respond quickly in the event of an emergency. First Aid back up should be on poolside at all times.</p> <p>It is suitable for teachers working in a wide range of swimming pools, including pools where the water is deeper than the teacher’s standing depth. This award is only suitable when the facility has staff qualified as lifeguards or First Aiders that are available to respond quickly to a Swimming Teacher or coach in the event of an emergency.</p> <p><b>If lifeguard or First Aid backup is not available on poolside, the standard NRASTC should be used. In all cases, in a school pool, if the minimum one NRASTC is used, there should be an additional member of staff trained to NRASTC LIGHT level either at the pool or very close by.</b></p>	



**It is the school’s responsibility to ensure that both NRASTC LIGHT and First Aid qualifications are current and in date. If either expires, the NRASTC LIGHT becomes invalid.**

For more information, please visit the Bucks School Swimming Partnership website: <https://www.bssp.org.uk/>

**Please note:** The guidance above states the minimum provision required by Buckinghamshire Council and the Bucks School Swimming Partnership. In all circumstances, schools should also refer to the pool’s NOP as more advanced qualifications may be needed after a risk assessment.

School staff will be responsible for ensuring that they keep a record of their expiry dates, both individually and in the School Swimming Folder, and must undertake a one day refresher course **prior to expiry of the qualification.**



Lifeguards will only be able to work in a pool where they are qualified to the pool's maximum depth.



**Programmed activity is defined as:**

- **With a formal structure**
- **Disciplined**
- **Supervised or controlled**

**UNPROGRAMMED SCHOOL SESSIONS, OWING TO THEIR UNPREDICTABLE NATURE, ARE PROHIBITED FOR SCHOOL SWIMMING.**

### **Schools using leisure provider pools:**

A Health and Safety talk should be given to every class (pupils and teachers) at every pool on the first lesson of each term. This could be supported by a briefing at school on behaviour, expectations and pool rules prior to their attendance. Pupils should be reminded of these aspects regularly or when required, to ensure familiarity with the pool alarm and emergency procedures. If a pupil is absent for the briefing (or a new pupil joins the school) they must be given the brief before commencing swimming.

### **Schools using their own pools:**

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

# Diving – Shallow Entry Racing Dives

Diving must only be taught by an appropriately qualified Swimming Teacher with a diving specific qualification. At no point must anyone without this qualification be allowed to teach diving. Please note: **not all Swim England Level 2/STA Level 2** qualifications will include an appropriate qualification to teach diving.



**NB. All qualified Swimming Teachers (from both schools and leisure providers) must check with their qualifying body whether their qualification covers them to deliver diving.**



The definitive guidance document for diving into swimming pools is from the Chartered Institute for the Management of Sport and Physical Activity (CIMPSA) and titled, 'Diving into swimming pools and open water areas'.

Prior to any standing dives being taught from the poolside, pupils should have developed an appropriate level of confidence and competence in aquatic practices in the water and from a sitting or kneeling position on the poolside.

Typical progression from this is for pupils to learn to perform the jumps and simple plunge dives from standing on the poolside. As well as being taught the correct technique, the pupils should also learn when it is appropriate to use the dive.

Where diving forms part or all of a swimming lesson, the pool freeboard (the distance from the poolside to the water surface) should be less than 0.3m with a sufficient **forward clearance** (the horizontal distance at which the minimal depth of water is maintained) typically in excess of 7.6m.

The depth of a dive is affected by:

- The height from which the dive is made - more height can lead to a deeper dive
- The angle of entry - a steeper entry can lead to a deeper dive
- Flight distance - a short flight can lead to a deeper dive
- The strength and drive from the diver's legs - a strong dive can result in a deeper dive

Diving should not 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. Teachers should therefore take into account the clearance required. Staff should ensure dives are executed into the deeper end of the swimming pool as a matter of routine safety. Only shallow entry dives should be permitted.

Diving blocks and stages must conform to FINA/Swim England Regulations.

## **Teaching Diving from the Poolside**

*The head-first nature of diving means that it must be risk assessed before taking place and supervised at all times by appropriate qualified staff, with students made aware of its potential dangers.*

Safety considerations include:

- Water depth
- Pool space
- Organisation and discipline
- The dive itself
- Student ability and confidence levels.

Diving should only be permitted when the following safety considerations are met:

- The teaching of diving from the poolside should take place in a minimum depth of 1.8m
- The maximum freeboard height (height from the water to the poolside) of 0.38m
- A minimum forward clearance of 7.6m
- The swimming teacher holds a Level 2 swimming teacher qualification.

The 'Competitive Start' CPD is available for Level 2 swimming teachers to learn how to safely teach and assess competitive starts.

A shallow dive is a competitive swimming skill and as such will be taught at local swimming clubs.

The sport of diving involves diving from springboards and platforms and is taught at diving clubs. Diving, competitive swimming, water polo and artistic swimming clubs can be searched for on the Swim England website.

afPE Safe Practice 2024

**IMPORTANT  
INFORMATION**

**“Goggles should never be worn when diving**

afPE Safe Practice 2024

Swim England has reviewed the minimum depth of a racing start as 1.35m. Please see the guidance - [here](#)

# School Swimming Galas

Schools involved in School Swimming Gala's should adhere to both AfPE guidance (previously published 2010) and the following documents:

- *'Risk Management Considerations for Centrally Organised Sports Events'* **Appendix M**
- *'Considerations for those involved in Primary School Swimming Galas'* **Appendix N**

These documents include guidance on safety aspects in planning and involvement in the event, including risk assessments. **Appendix O** also contains an example Bucks Swimming Gala Risk Assessment.

# Other Swimming Related Activities

## Triathlon

Triathlon (combining swimming, cycling and running) has grown in popularity in recent years. Pupils can be introduced to the activity through school events, and can compete from as young as eight years old. Refer to the [British Triathlon](#) website for clear rules and regulations to be followed during all three aspects of triathlon.

## Swimming Outdoors & Open Water Swimming

### Recognising the hazards

Swimming Pools	Sea and Coastal Areas	Inland Water Sites
Slippery surfaces	Waves and tides	Speed of the water
Different depths	Sudden depth changes	Debris and pollution
Steps/hoists	Hidden hazards - rocks, stones, debris	Hidden hazards - weeds, rocks, debris
Trip hazards	Cold water	Dangerous banks, ice or wet leaves.
Other swimmers	Offshore winds	Canal locks, weirs

### Additional considerations

It is important to consider the following when swimming outside:

- Follow the Water Safety Code.
- Always look for guidance and warning signs, and follow the safety guidance
- Swim at a lifeguarded area between the red and yellow lifeguard flags
- Swim parallel with the edge and in standing-depth of water
- Avoid drifting in the current - identify a landmark if you are moving with currents
- Check tide times to avoid being cut off by incoming tides
- Get out as soon as you start to feel cold
- Wash hands and face in fresh clean water and, if possible, take a shower straight after swimming

### Beach flags

Information relating to safety at the beach can be found at [www.rlss.org.uk/water-safety-at-the-beach](http://www.rlss.org.uk/water-safety-at-the-beach)

### Cold Water Shock

Falling into, or swimming in, cold water makes it more difficult to swim, breathe and stay alert.

The first reactions are:

- Gasping for breath
- Heart rate and breathing rate will increase

This can often cause panic.

The effects of cold water shock begin to subside within 60 to 90 seconds. Follow the Water Safety Code - flat, breathe and stay calm.

## What to do:

- Keep calm
- Float on your back
- Gain control of your breathing by taking slow, deep breaths
- Float, scull or tread water and signal for help
- If possible, swim to safety or something that floats
- It is important to keep warm and retain your body heat by taking up the Heat Escape Lessening Position (HELP) whilst awaiting help if you are not able to self-extract from the water

*afPE Safe Practice 2024*

Please see Section on Natural Water Bathing / Open Water Swimming see page 86.

# Religious and Cultural Considerations within school swimming

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

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

## What should schools put in place?

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



[Useful Links/Resources](#), [Multilingual Activity Flashcards](#) and [Swim Pix](#).

# Swimming Clothing and Equipment

## Teacher Clothing and Equipment

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



School staff should wear clothes suitable to the environment, humidity and temperature of the pool.

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

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



### Whistle Drill

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



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

## Pupils' Swimming Attire

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

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

Fitness watches/wristbands should be removed for school swimming. Religious artefacts need to be removed or made safe. Health and safety law would usually take precedence over equality law because of the implication of the "safety of others" and the specific duty set out in the Health and Safety at Work etc Act 1974. If, following discussions with parents and faith leaders, their removal becomes

contentious, the activity and involvement of the wearer needs to be suitably modified to mitigate undue risk. AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2020.

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



Useful links ▶

(Improving Participation of Muslim Girls in Physical Education and School Sport, Shared Practical Guidance from Birmingham Schools, 2008; Chp2 & 3 Changing and Swimming Respectively). See Appendix [K](#).

And also Appendix [L](#) - (Comment on Meeting the Needs of Muslim Pupils in State Schools: Information and Guidance for Schools,' British Muslim Council, 2008, AfPE, Chapter 3, pages 30, 31 and 38).

Pupils should not be excluded from school swimming because of verrucas, as learning to swim is statutory in the National Curriculum and helps prevent death from drowning. Swim England advice includes discouraging the use of devices such as plastic socks to protect the feet, as with elasticated knee bandages, the socks have limited value other than to attract attention. They advise the use of a waterproof plaster to be sufficient to cover the verruca during lessons. Alternatively, over the counter treatments e.g. Bazuka provide a layer of protection over the verruca. Further information from Swim England can be found [here](#).



**Swimming hats have been developed to be more inclusive i.e. having a 'loose fit' design. Information about these can be found [here](#).**

**Please note there may be other providers and sellers of this type of hat.**

# Guidance on Goggles

## Association for Physical Education and Swim England Guidance

While swimming goggles may make a pupil feel comfortable in the pool while they are learning to swim, if they accidentally end up in water it is unlikely they will be wearing them. It is vital that pupils are comfortable swimming with or without goggles so they don't panic in an unexpected situation.

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

The decision to allow swimming goggles during lessons is down to the **school's PE Policy** and communication with the School Swimming Provider. Pupils with medical eye conditions may need to be allowed to wear goggles. There may be particular situations, such as in hydrotherapy pools where the higher temperature may affect chemical balance and may cause eye irritation but this should be managed through water treatment strategies rather than recourse to goggles.

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

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

The Swimming Teacher for the group is responsible for determining whether any pupil wearing goggles is using them safely and for a positive purpose. If they are not, then the pupil should be asked to remove the goggles. Ill-fitting goggles may mist up or fill up with water, thus affecting visibility. **School staff should not fit or adjust a pupil's goggles.**

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



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

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

*Swimming goggles may be worn by students when swimming at competition level and for extended, regular training sessions. They can help to maintain the required body position and improve vision through the water. In contrast, within short curriculum swimming lessons (typically 20-25 minutes' water*

time) for beginners, or for single, short races in school galas, goggles are not considered to be necessary unless there is some justified medical reason.

*In cases of extreme short-sightedness or in rare instances where individuals have particularly sensitive eyes or wear contact lenses, schools should require a parental letter stating that the student has particular needs to warrant the use of goggles. Such a letter would have the status of simply being informative and would not constitute any form of indemnity should injury arise later through the misuse of the goggles. Additional medical certification about such particular needs is costly to obtain and should not be sought as this information is likely to have been previously set down in the student's records.*

*Students learning to swim or improving their swimming ability often do not swim in straight lines, and as a result, they might get close to, or come into contact with, other swimmers. If goggles are worn, any contact with others (e.g. the flailing arm of a beginner learning a new stroke) might result in injury to both the swimmer wearing the goggles and those who are not;. Feeling confident and safe in the water, and swimming underwater, should not be dependent on wearing goggles, neither are goggles designed for such activity, as the eye pressure cannot be relieved.*

*When swimming goggles are used, they should be made of unbreakable plastic or rubber materials. The British Standard for the manufacture of goggles (BS5883:1996) includes the requirement that the packaging should contain instructions for putting them on and removing them. Students should be taught to remove goggles by slipping them off the head and not by stretching the retaining band away from the face as wet plastic is slippery and may cause injury to the eye area. Goggles that are not properly fitted may mist up and adversely affect visibility.*

*Given the potential for injury in curriculum lessons, the teacher responsible for the group should have the prerogative to require any student to remove their goggles for reasons of safety if they are constantly adjusting, removing and replacing them. The teacher is not responsible for fitting or adjusting students' goggles. Where a student does wear goggles, they need to be able to fit them independently.*

*As with the management of any risk in PESSPA, all aspects of the situation should be taken into consideration before the school, along with the provider (if lessons are taken externally), makes a decision about policy regarding the wearing of swimming goggles. Where the employer sets a Water Safety Policy, this should be adhered to, and schools should inform parents of the contents of the policy.*

*In some cases, according to the stage and ability of the student, the use of goggles may be permitted. The reasons for a decision either way should be fully explained in the risk assessment for the particular activity.*

*In a swimming pool environment, students who are very short-sighted may not be able to see the teacher's gestures or read any signage unless they are in extremely close proximity. Not being able to see the teacher clearly can also affect how students receive verbal instructions, which might impact significantly on safety. In cases of extreme short-sightedness (myopia), prescription goggles, which are now more widely available and reasonably priced may result in a safer swimming experience for the student.*

*When students complain of eye irritation during swimming sessions, the cause, in almost all cases, is an incorrect chemical balance in the water. If several students are reporting eye irritation as a result of swimming, the pool provider should be informed. This imbalance can be eradicated. In other situations, hospital records show that irritation might result from a reaction to the chemicals used to clean the lenses of the goggles at home.*

*Swimmers who are training daily usually wear goggles because they are exposing their eyes to the effects of the chemicals in the water for long periods. In some cases, the tissue around the eyes does not dry out between training sessions and thus becomes more susceptible to infection. Goggles offer regular swimmers some protection against this happening.*

*Goggles should never be worn when diving.*

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# Safeguarding

Each school will have their own **Child Protection Procedures** and so too should the pool. It is important that the pool procedures relate to those of the **Buckinghamshire Council**. A school using a pool, other than their own, should establish a working agreement identifying the relationship between their respective procedures. This should include how any concerns raised will be progressed, recorded and addressed by school staff and leisure provider staff. Staff and pupils should behave and conduct themselves in accordance with their school's policy when using the centre. School staff should know who their Designated Safeguarding Lead is both at school and at the leisure provider facility.

The school should assure themselves that the leisure provider has followed a safer recruitment process. All persons working with pupils frequently and/or intensively or who are working in "regulated activity" must have a relevant **DBS Check** and that any other relevant safeguarding vetting checks have been undertaken. This should be shown with the hire agreement if these are not school or BC staff.

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

- Develop an essential swimming skill or technique,
- Treat an injury,
- Prevent an injury,
- Meet the requirement of the activity (e.g. Lifesaving),
- Lift or manually support a pupil with disabilities,
- Assist with a personal care task which the pupil or young person cannot undertake by themselves.

In these circumstances, the adult should explain the reason for the physical contact with the pupil. Unless the situation is an emergency, the adult should ask the pupil for permission. If pupils have disabilities, they and their carers need to be involved in deciding what assistance should be offered, the pupil should be treated with dignity and respect. Management of a pupil with disabilities participating in swimming activities should form part of the school's risk assessment for the activity and plan of care for the pupil. This should be agreed with the pupil and parent/carer prior to the commencement of the School Swimming programme.

If staff are in the water, they need to wear a t-shirt and shorts to cover swimwear (refer to Page 45).

**IMPORTANT  
INFORMATION**

*'When manual support is being provided, care must be taken to avoid embarrassment to the teacher or the pupil. Where manual support is provided, other adults and pupils should be in attendance.'*

*NCTP Learner Guide*

The protocols Swim England suggest include the need to:

- Ensure there is a system included within the Pool's NOP/EAP whereby the parent or carer of the pupil gives permission for the teacher to handle the pupils for the purposes of supporting them in the water or manipulating limbs to convey correct stroke techniques (this could be through the parental swimming permission form)
- Ensure that any handling of pupils is done within clear sight of other persons
- Always explain to the pupil that you are now going to hold him/her and why, to avoid embarrassment
- Support pupils in such a way that the swimming teachers' hands can be seen by the spectators,
- Ensure a pupil is not supported by their torso

- Support swimmers by holding their hands, head or feet. Swimming equipment/aids to be encouraged

**Additionally, teachers should NEVER teach or coach a swimmer alone.**

Where pupils sustain an injury and any First Aid is administered the incident must be reported to the pupil's parent/carer by school staff as soon as possible. School staff must take responsibility for recording the details of the incident, including actions taken to safeguard the pupil and a record retained in line with school policy. Accidents and incidents which occur should also be recorded by pool staff on their forms for their records and further reported to Buckinghamshire Council via the Assessnet.

In the event of a pupil needing to be taken to hospital for treatment, a representative from the school, known to the pupil, should always accompany the pupil. If this leaves the school group short of staff at the pool, then the school should be informed to seek additional staffing for the group. The parent/carer of the pupil should be informed as soon as possible.

All adults in a position of trust (teachers, volunteers, and staff) should avoid placing themselves at risk by being alone with a pupil and should ensure that wherever possible, there are other responsible persons around and that they are in public view.

The school must be aware of all viewing areas or public areas which may overlook the pool. Consideration needs to be given to the use of mobile phones in these areas; school staff need to remain vigilant at all times and report any concerning behaviour to the designated Safeguarding Lead both at the centre and school.

## Volunteers in School Swimming

The school and **Headteacher** must be aware of **all** adults supporting in a voluntary capacity in the delivery of school swimming sessions.

The following criteria must be sought prior to any volunteer(s) assisting with the delivery of your school swimming and water safety programme:

1. Does your school receive any additional support for school swimming i.e. a volunteer with swimming teaching qualifications?
2. Has this volunteer attended Safeguarding training within your school?  
**N.B. There needs to be documented evidence of this i.e. Safeguarding Certificate.**
3. Do you hold copies of their qualifications (Swim England / ASA or STA teaching/ coaching) within your School Swimming folder?
4. What is the date of the qualification, Swim England states that some form of CPD must be fulfilled every 5 years.
5. Is the additional volunteer included in the risk assessment for that particular class?  
**N.B. This risk assessment should also consider the guidance from KCSiE paras 305-308.**
6. Has the school completed a DBS check on the volunteer? Is this in the Swimming Folder?  
**N.B. If this volunteer is being overseen by the school, then their details should be added to the single central record (KCSiE para 273) accompanied by full references as well.**
7. Are parents/carers informed about any additional support?

**IMPORTANT  
INFORMATION**

A **written** agreement needs to be in place with the volunteer(s) to ensure that best practice has been adhered to in regards to Safer Recruitment and your school's Safeguarding Policy.

## Supervision of Changing Rooms

Parents/carers should be informed of changing arrangements.

It is the responsibility of the accompanying school staff to provide appropriate supervision whilst the pupils are changing. Only staff of the appropriate gender should enter the changing room, where possible, unless in an emergency. Using members of the opposite gender to supervise mixed-gender groups in separate changing rooms is acceptable unless there are significant elements of relative intimate contact that may affect the dignity, comfort and confidence of either pupils or staff. A mixed gender group may use an open plan, single sex changing area if the pupils are under the age of seven and with agreement from pool management. Discuss changing options with your leisure provider. Where pool staff are able to assist with supervision of changing rooms, this arrangement with the pool management needs to be assured and consistent. This may include, for example, pupils using dry side changing facilities; disabled changing areas (where appropriate) or signs on changing room doors requesting members of the public change in cubicles.

There should never be a situation where a member of staff is alone with a pupil. Should this incident arise, this must be reported on return to school. All of the pupils should remain together in a group. Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise pupils and that pupils are safeguarded from members of the public.

Where additional help is required, owing to a pupil having additional needs, a second adult must be present and both the pupil and parent/carer's consent must be sought.



Safeguarding considerations for changing rooms (NSPCC, April 2024), [click here.](#)

## Changing Arrangements for School Swimming

As with all changing associated with PE activities, school staff need to ensure this process is effective, safe and inclusive.

As school swimming and water safety lessons are often delivered in a facility with members of the public present there are additional considerations:

- It is not always feasible for schools to have exclusive use of larger facilities and in these instances dual use of the facility may be required
- Site visits prior to the first swimming lessons should take place so that supporting school staff are aware of where they are required to take students and where any higher-risk areas are
- School staff should be aware of where the toilets, shower areas and changing areas are located and who will be responsible for supervising students in those areas
- Separate changing rooms or a zone if the changing area is a changing village should be identified and clearly signed as school use only
- Other control measures may be in place such as screens or alternative methods of accessing the pool or changing area, possibly arranged with the pool operator

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## Facilities for Transgender Students

### Changing facilities for transgender students

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

Participating in physical education is important to the physical and mental well-being of students. A young trans person has the same right to access physical education as their peers and to take part in competitive sports.

Toilets and changing facilities are often deemed the most sensitive of all the issues for transgender students, and there is much debate around the inclusion of trans young people in gender segregated facilities. Concerns usually stem from a worry that young trans people may find themselves in a vulnerable position and may be subject to transphobic bullying or unwanted attention that has the potential to escalate to something more serious such as physical or emotional harm. Equally young trans people want to be able to 'pass' as their true gender and want to be seen and treated as such.

It is sensible to rename these facilities so that there is less stigma attached for any student who may need to use these toilets. Recommended names for these toilets include unisex accessible toilet, larger toilet, and toilet and changing facility. This ensures that the school respects the dignity of trans students and others using the toilet while ensuring their safety.

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

**(Association for Physical Education, AfPE, Safe Practice in Physical Education, School Sport and Physical Activity 2020).**

# Conditions of Hire to Outside Organisations

Pool Operators cannot delegate responsibility or accountability, for what happens in their pools. Therefore, if a school pool is hired to an outside organisation, it is the responsibility of the school who will need to ensure that the outside organisation will use the pool in a safe manner. (See Appendix [H1](#)).

*Where a school hires their pool to user groups, those groups become responsible for the safety of participants, except where any injury results from negligence on the part of the employer, for example a failure to maintain the pool to an appropriate standard. The hirer, whether that is the employer or the Governing Board, will also be liable if the hiring agreement states that the premises are safe for a specific purpose that turns out not to be the case.*

*(Association for Physical Education, AfPE, 'Safe Practice in Physical Education, School Sport and Physical Activity 2020).*

*Every pool operator is responsible for the health and safety of employees, pool users and other people on the premises. The Health and Safety at Work Act, the Management of Health and Safety at Work Regulations and others place general obligations on pool operators.*

## HSE Health and Safety in Swimming Pools (last update February 2024)

The school (hirer) will need to set up a contract of hire for the pool user. The responsibility of the pool owner/operator is to ensure that the pool is in a safe condition and fit for purpose and that the hirer acts in a safe and responsible manner. The pool owner/operator may request the hirer's Risk Assessment of their activities with the additional pool safety operating procedure (PSOP) for the activity.

The Health and Safety Executive regulations require that all facilities and managed operations produce a written Risk Assessment. This forms the basis of the written NOP and EAP. Any school hiring another school's pool must understand their role in the EAP. Where a school hires a pool from someone else, that organisation will need to make sure that the school is supported in the safe use of the pool, including safeguarding of young people and vulnerable adults (See Appendix [H3](#)). The mechanism for this is initially the agreement to hire and any conditions of hire imposed by the organisation. Hire conditions will be based on provisions made in the NOP and EAP for the pool.

The agreement to hire should be reviewed at regular intervals - whenever dates and times are confirmed, these should be recorded in a signed agreement between the two parties. **The hirers should also be given an up to date copy of the relevant NOP and EAP for the facility** and any special conditions of hire, which might apply to their session. A qualified RLSS UK NPLQ, NRASTC or NRASTC LIGHT Qualified Lifeguard must be present **regardless of pool depth. They must be competent and confident in their role and ensure that their training is up to date and renewed regularly for the pool they will be working in.** The following applies:

- A programmed session requires RLSS UK NPLQ, NRASTC or NRASTC LIGHT qualification (this must be based on risk assessment)
- an un-programmed session requires NPLQ Lifeguard qualification

## Conditions of hire should include:

- Name and address of the organisation hiring the pool
- Name and address of the pool being hired
- Name of the hirer's representative (the responsible person - first point of contact) and contact details
- Activity for which the pool is to be hired (to inform the Risk Assessment)
- Numbers participating
- Age
- Swimming ability
- Specific agreement on the respective responsibilities of the hirer and the pool operator to include:

- Number of Swimming Teachers and qualifications (certificates should be seen)
  - Number of lifeguards, qualifications and level of provision (again, certificates should be seen)
  - Qualifications of First Aiders (certificates should be seen)
  - School Child Protection Policy
  - Other staffing and roles
  - Ratios for programmed and unprogrammed sessions (refer to pool's NOP as un-programmed sessions are often prohibited due to their unpredictable nature. This should certainly be the case for school swimming. In addition, young children require close supervision in the water by an adult; 4 years and under in a ratio of 1:1; 8 years and under in a ratio no more than 2:1)
- Details of responsibilities in the event of an emergency (normally it is the operator of the pool who is responsible for building related problems and the hirer for emergencies associated with the activities of the group)
  - The responsibility of the hirer to ensure that safety advice and specific rules for swimmers are enforced,
  - A signature from the hirer to confirm that they have received, read and understood the NOP & EAP
  - A protocol for Safeguarding Procedures. All persons working with pupils must have an up to date DBS and this needs to be shown with the hire agreement
  - Appropriate third party public liability insurance to the value of £10 million

An individual form should be completed for each group hiring the pool, as ratios/equipment/ability etc may be different for each.

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

# Safety Equipment

Safety equipment such as poles, throw ropes or throw bags and first aid provision (including emergency blankets) must be readily available and sufficient in quantity, regularly checked and positioned when needed without creating additional hazards to pool users. Special School pools will have different equipment such as tracking hoists, boards and buoys.

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



All school pools must be equipped with an effective measure of summoning support in the event of an accident or incident including a backup method, such as landline phone, mobile phones/walkie-talkies (providing strong signals and fully charged).

**Therefore, it is necessary for all schools to complete a thorough risk assessment to find the most appropriate method of raising the alarm for their pool.**

Other safety considerations include:

- Pool depths should be marked clearly around the pool and all signs should be compliant with the Health & Safety (Safety Signs and Signals) Regulations 1996. In pools with a sudden change in depth, there should be a pool profile on display
- A pool divider (usually a rope) should be positioned to separate deep and shallow water when weak/non-swimmers are present
- Pupils with physical disabilities, where a hoist may not be the quickest form of exit in an emergency. Schools may need a spinal board for this purpose



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

# School Pool Management

## Pool Managers

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

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

Headteachers of schools with pools on their site must attend the course entitled **Swimming Pool Awareness for Headteachers (offered by the PALM Academy and delivered by Carlton Associates Ltd)** - this requires refreshing every 3 years.

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

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

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

Refer to [Part 2](#), **BC Technical Guidance on The Management of Swimming Pools and Swimming Pool Plant on School Sites**.

## Pool Plant Operation

### For school pools:

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

### Pool plant operators:

Pool plant operators must attend the PALM Academy Small Pool Operators Certificate (PWTAG accredited pool plant qualification): [PWTAG Training Qualifications](#)

This is a two day course covering:

- What the plant operator needs to know to keep the pool water reasonably free from the risk of infection spreading, to
- keeping the water clear so that pool users can be seen under the water, and
- how to operate a simple school pool plant safely and effectively.

This qualification is valid for three years and must be updated by attending a one-day Refresher (or an equivalent qualification that meets the PWTAG training syllabus).

### **In Public pools/Non-school pools:**

Standards should be to the PWTAG Swimming Pool Technical Operator standard, (PALM Academy Swimming Pool Technical Operator Certificate, or equivalent). This qualification has a three year life and must be re-validated by a one day refresher course.

If there is any concern with regard to pool safety (including the clarity and quality of the pool water), schools must report this to the manager of the pool.

Public pools are normally checked by the Local Environmental Health Officers. Pools in private houses are not checked, therefore they are only suitable for domestic use by family and friends and should not be used by schools.

Refer to [Part 2](#), BC Technical Guidance on The Management of Swimming Pools and Swimming Pool Plant on School Sites.

## **Monitoring**



Schools should contact **Carlton Associates Ltd** to arrange an inspection for school seasonal pools and hydrotherapy/non-seasonal pools prior to opening. Contact details can be found on page 90.

Aspects for compliance include the following:

- Training and competence
- Written safe operating procedures
- Risk Assessments, including Cryptosporidium (see Appendix [W](#))
- Site safety
- Signage
- Chemical safety
- flow meter and water testing regime

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

To ensure that pools are being operated correctly, an agreed water quality monitoring and testing regime is organised using a competent contractor, for example Kingfisher.

Microbiological testing is carried out at the following frequencies:

1. hydrotherapy pools – weekly testing.
2. non-seasonal pools – every month,
3. seasonal pools – every month during the operating season, with the first being taken prior to opening. Please note that a satisfactory microbiological report must be received before a seasonal pool reopens after the summer holiday period,

## Pool closures

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

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

Following closure for any reason, it will be the establishment/setting's responsibility to arrange for remedial measures to be taken for further testing and analysis of the pool water chemistry, by a competent contractor and to obtain satisfactory results before the pool can be put back into use. The Health & Safety Team (see Contacts) must be informed of the results. See [Part 2](#), Technical Guidance on the Management of Swimming Pools and Swimming Pool Plant on School Sites, for further information.

## Records

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

## Routine Maintenance

Daily running of the pool and related plant will be the responsibility of the Pool Operators. Support is available for Pool Operators from Carlton Associates Ltd and the Buckinghamshire Council's Health and Safety Team (see Contacts). These details should be held for routine support and emergency call outs (this service by the PWMC [Pool Water Maintenance Contractor] is one that the school has to pay for directly).

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

Pool Operators should ensure that all safety fittings, such as pool steps, handrails, etc. and also diving boards and other equipment, are secure, in good repair and have non-slip surfaces, and that broken or missing grids to water outlets at the bottom of pools are replaced immediately. Pool surrounds (whatever the surface) should be slip resistant, flat and without any trip hazards to prevent injury to bathers feet. Where there are cracked paving slabs these should be replaced immediately.

## Records – Swimming

Records of all qualifications of those involved in the teaching of school swimming and water safety must be maintained, kept up to date and available for inspection if required.

The person responsible for this is the Teacher in Charge of School Swimming. These records will be kept in the School Swimming Folder and will be looked at as part of the Health and Safety Team Audit programme.

## Accidents, Incidents and Near Misses

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

# Educational Visits

## Approval via EVOLVE is required (tick 'adventurous' as a visit type)

All swimming activities and venues including hotel pools (UK and abroad) must be identified within the visit planning and itinerary and lifeguarding arrangements checked in advance.

LA approval is not required for a Lifeguarded Swimming Pool.

For guidance for using swimming pools during off-site visits please refer to the [National Guidance document](#)

## Natural Water Bathing / Open Water Swimming

Natural Water Bathing should always be a robustly **structured** activity. Where open water swimming is planned for pupils, either as part of a residential experience during curriculum time or outside of normal school hours, parents should be fully informed. Guidance documents on Open Water Swimming are available from Swim England and the RLSS UK: Information on the Management of open water swimming events can be found [here](#).

As with any activity, the leader must be absolutely clear that there are no significant risks. Planning should consider the **SAGE** (Staff, Activity, Group, Environment) variables.

The Visit Leader must undertake a risk assessment in consultation with agencies that have local knowledge of the venue. This should include reliable weather information and will need to be continually reviewed to ensure the suitability of progressing with plans.

The risk assessment needs to consider all of the above SAGE variables in order to decide upon appropriate safe supervision level and plan, before the activity takes place. This plan should be communicated to all staff and participants.

Pupils should be briefed and understand:

- The [Water Safety Code](#) and strategies to manage [Cold Water Shock](#)
- Why they should proceed and enter the water with **caution**
- **Boundaries** of the area where they are swimming - these are manageable and contained and that they should not venture outside of these in adherence to [British Beach Flag Signs](#) (please note if travelling abroad that these are checked before briefing)
- The need to remain in **shallow water** if they are a weak swimmer, so they are able to put their feet on the bottom and stand up
- Any other **hazards** as identified on the Risk Assessment in relation to being in the water



Please refer to the [National Guidance for the Management of Outdoor Learning Off Site Visits](#) and the [Learning Outside the Classroom](#):

1. [Natural Water Bathing](#)
2. [Swimming Pools \(use during educational, off-site visits\)](#)
3. [Group Safety at Water Margins](#)



Please note that schools wishing to partake in any outdoor water based activity must follow the National Guidance, which can be found [here](#).

**The pleas of young people to be allowed to bathe (e.g. because it is hot weather) must never be allowed to override the leader's judgement of the situation.**

## Further Considerations

School staff and trip leaders need to ensure that they are aware of the risks of diseases found in urban rivers, canals and lakes, the most prevalent being Leptospirosis or 'Weil's Disease'. Symptoms can include a high temperature; chills; headaches; loss of appetite; muscle pain; irritation of the eyes; a rash. These symptoms can develop between 2 and 30 days after exposure. If untreated, the disease can cause organ failure becoming life threatening. The infection can be caught by swallowing water or by getting into the bloodstream through a cut or graze. Pupils need to be told therefore to avoid swallowing water where possible and to cover any cuts or grazes with a plaster.

For further clarification on any of the above please contact [swimming@ahs.bucks.sch.uk](mailto:swimming@ahs.bucks.sch.uk)

# References

1	All schools with their own pools should have a copy of HSG 179 'Managing Health and Safety in Swimming Pools' 4th Edition, Published 2018, which they can purchase from the <a href="#">Health and Safety Executive (HSE)</a> , or also available to download free from: <a href="http://www.hse.gov.uk">www.hse.gov.uk</a>
2	Swim England <a href="#">A Guide for Primary Schools</a>
3	Swim England <a href="#">Safe Supervision</a>
4	The Association for Physical Education, Safe Practice in Physical Education and Sport. 10th ed. 2020: Association for Physical Education; ISBN: <a href="#">978-1-909012-47-9</a> since replaced by the 2024 version <a href="https://www.afpe.org.uk/page/Safe_Practice_in_PESSPA">https://www.afpe.org.uk/page/Safe_Practice_in_PESSPA</a>

AfPE - 2024 - How would we reference? Dead link?


# Organisations

1	<a href="#">Association for Physical Education (AfPE)</a>
2	<a href="#">British Swimming Coaches Association</a>
3	<a href="#">British Triathlon</a>
4	<a href="#">Chartered Institute for The Management of Sport and Physical Activity (CIMSPA)</a>
5	<a href="#">Government Safety Advice on Water Sports and Coastal Activities</a>
6	<a href="#">HSE Managing Health and Safety in Swimming Pools</a>
7	<a href="#">Improving Participation of Muslim Girls in Physical Education and School Sport, Shared Practice Guidance from Birmingham Schools, 2008 (Appendix K)</a>
8	<a href="#">Institute Of Swimming</a>
9	<a href="#">Maritime and Coastguard Agency (MCA)</a>
10	<a href="#">NSPCC (Changing Rooms)</a>
11	<a href="#">Royal Life Saving Society (RLSS UK)</a>
12	<a href="#">Royal Society for the Prevention of Accidents (ROSPA)</a>
13	<a href="#">Scottish Swimming</a>
14	<a href="#">Sport England Affordable Swimming Pools</a>
15	<a href="#">Swim Ireland</a>
16	<a href="#">Swimming.org [Shallow Dives, Ramadan]</a> <ul style="list-style-type: none"> <li>• <a href="#">Swim England School Swimming and Water Safety Charter</a></li> <li>• <a href="#">Curriculum Swimming and Water Safety Resource Pack</a></li> <li>• <a href="#">Swim England and the RNLI 'Swim Safe' Programme</a></li> </ul>
17	<a href="#">Swimming Teachers Association</a>
18	<a href="#">Swim Wales</a>
19	<a href="#">Water Safety Education   Royal Life Saving Society UK ( RLSS UK )</a>

# Governing Bodies for Specific Water Based Outdoor and Adventure Activities

1	<a href="#">British Canoeing</a>
2	<a href="#">British Caving Association</a>
3	<a href="#">British Mountaineering Council</a>
4	<a href="#">British Rowing</a>
5	<a href="#">Canoe Wales</a>
6	<a href="#">HSE AALA (2015) "Coasteering" (Note 6.20)</a>
7	<a href="#">HSE AALA (2016) "Combined Water Rock Activities - A Safety Checklist" (Note 6.06)</a>
8	<a href="#">International Coasteering Federation</a>
9	<a href="#">National School Sailing Association</a>
10	<a href="#">Rafting: OEAP; HSE/AALA (2015) "Improvised Raft Building" (Note 6.08); RYA: rya.org.uk</a>
11	<a href="#">Royal Yachting Association (RYA)</a>
12	<a href="#">RYA Scotland</a>
13	<a href="#">RYA Windsurfing</a>
14	<a href="#">Scottish Canoe Association</a>
15	<a href="#">Surfing GB</a>
16	<a href="#">Surf Life Saving Association of Great Britain</a>
17	<a href="#">Welsh Yachting Association</a>

## For further Information and Advice:

Specialist	Email and/or web addresses	
<b>Zoe Rogers BC &amp; BSSP Adviser &amp; Swim England Licensed Tutor</b>	swimming@ahs.bucks.sch.uk	01296 388222
<b>Anna Nicol BSSP Administrator</b>	swimming@ahs.bucks.sch.uk	01296 388222
<b>BC Education Safeguarding Advisory Service</b>	secure-esasduty@buckinghamshire.gov.uk	01296 387981
<b>Biological Monitoring Kingfisher Environmental</b>	Info@kingfisher-es.co.uk	01920 871700
<b>Herts Handling Training Ltd – Manual Handling Training for pupils with disabilities</b>	info@hertshandling.co.uk	01582 730701
<b>Lorna Goldie School Swimming &amp; Water Safety Development Officer Swim England</b>	Lorna.Goldie@swimming.org	01509 618700
<b>Mike Harwin BC Outdoor Education Adviser</b>	mike.harwin@buckinghamshire.gov.uk	07890 395028
<b>Mike Shuff, Director Training Pool Plant Management Carlton Associates Ltd</b>	enquiries@carltonassociates.co.uk	0121 706 0084 07710 206945
<b>Kelly Jagger, Director Common Sense Training Ltd</b>	kelly@commonsensetraining.co.uk	07967331454

# Appendices

Appendices marked <sup>(1)</sup> relate particularly to Part 1: Bucks Safe Practice in School Swimming Policy

Appendices marked <sup>(2)</sup> relate particularly to Part 2: Technical Guidance on the Management of Swimming Pools and Swimming Pool Plant on School Sites

Appendix A	<a href="#">Model Risk Assessment for a Public Pool</a> <sup>(1)</sup>
Appendix B	<a href="#">Model Risk Assessment for Indoor School Pools</a> <sup>(1/2)</sup>
Appendix C1	<a href="#">Model Risk Assessment for Outdoor School Pools</a> <sup>(1/2)</sup>
Appendix C2	<a href="#">Buckinghamshire Council Temporary School Pool (Pop-Up Pool) Swimming Policy</a> <sup>(1/2)</sup>
Appendix D	<a href="#">Model Normal Operating Procedure (NOP)</a> <sup>(1/2)</sup>
Appendix E	<a href="#">Model Emergency Action Plan (EAP)</a> <sup>(1/2)</sup>
Appendix F1	<a href="#">Changing Rooms for School Swimming – Guidance Notes March 2019</a> <sup>(1)</sup>
Appendix F2	<a href="#">AfPE Changing Areas in PE</a> <sup>(1)</sup>
Appendix F3	<a href="#">NSPCC Getting Changed for PE</a> <sup>(1)</sup>
Appendix G	<a href="#">Example Goggles letter from school to parents</a> <sup>(1)</sup>
Appendix H1	<a href="#">Condition for the Hire of School Pools</a> <sup>(1/2)</sup>
Appendix H2	<a href="#">Application for Hire of School Pools</a> <sup>(1/2)</sup>
Appendix H3	<a href="#">Additional Requirements for Hire by Vulnerable Groups</a> <sup>(1/2)</sup>
Appendix I	School Swimming Checklist (sent out every two years) <sup>(1)</sup>
Appendix J	<a href="#">Example School Accident Report Form</a> <sup>(1)</sup>
Appendix K	<a href="#">Improving Participation of Muslim Girls in Physical Education and School Sport: Shared Practical Guidance from Birmingham Schools 2008</a> <sup>(1)</sup>
Appendix L	<a href="#">Comment on Meeting the Needs of Muslim pupils in state schools: Information and Guidance for Schools, AfPE</a> <sup>(1)</sup>
Appendix M	<a href="#">Risk Management Considerations for Centrally Organised Events</a> <sup>(1)</sup>
Appendix N	<a href="#">Consideration for those Involved in Primary School Swimming Galas</a> <sup>(1)</sup>
Appendix O	<a href="#">Example Risk Assessment for Swimming Galas</a> <sup>(1)</sup>
Appendix P	<a href="#">Model Chemical Spillage Procedures</a> <sup>(2)</sup>
Appendix Q	<a href="#">Pool Water Log Sheet</a> <sup>(2)</sup>
Appendix R	<a href="#">Model Operating Instructions for a Trichlorinator</a> <sup>(2)</sup>
Appendix S	<a href="#">Health Protection Agency Pool Investigation Checklist</a> <sup>(2)</sup>

<b>Appendix T</b>	<a href="#">Induction Training Grid for Public and School Pools</a> <sup>(1)</sup>
<b>Appendix U</b>	<a href="#">Pre-commissioning and Decommissioning Procedures and Winter Maintenance</a> <sup>(2)</sup>
<b>Appendix V</b>	<a href="#">Swimming Pool Contractors and Equipment Suppliers</a> <sup>(2)</sup>
<b>Appendix W</b>	<a href="#">Generic Cryptosporidium Risk Assessment</a> <sup>(2)</sup>
<b>Appendix X</b>	<a href="#">Swimming Class Register including information on pupils with medical conditions and/additional needs; Information for leisure providers</a> <sup>(1)</sup>
<b>Appendix Y</b>	<a href="#">Waterborne Infections</a> <sup>(2)</sup>
<b>Appendix Z1</b>	<a href="#">Partnership Agreement</a> <sup>(1)</sup>
<b>Appendix Z2</b>	<a href="#">Partnership Agreement (Letter &amp; Form to Parents)</a> <sup>(1)</sup>