



Knowsley Council

COPY PASSED TO J TALLON ON 30.3.07. PW ASKED HER TO ENSURE THOSE STAFF GOING TO BATHS THIS SCHOOL YEAR ARE FULLY AWARE (AS PE CO-ORDINATOR)

KNOWSLEY METROPOLITAN BOROUGH COUNCIL

SAFE PRACTICE IN SCHOOL SWIMMING

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Contents

1	INTRODUCTION.....	3
2.	RESPONSIBILITIES.....	4
3.	TEACHER TO PUPIL RATIOS.....	7
4.	SUPERVISION OF CHANGING ROOMS	8
5.	LIFEGUARD PROVISION	9
6.	QUALIFICATIONS.....	11
7.	POOL PLANT OPERATION AND POOL MANAGEMENT.....	14
8.	RECORDS.....	15
9.	RISK ASSESSMENT.....	19
10.	NORMAL OPERATING PROCEDURE (NOP).....	22
11.	EMERGENCY ACTION PLANS	25
12.	POOL RULES.....	27
13	DIVING	28
14.	CONDITIONS OF HIRE	28
15.	CHILD PROTECTION.....	29

This document has been prepared for Buckinghamshire County Council Education Authority by the Institute of Sport & Recreation Management (ISRM) Consultancy Service. It is a document that has been adopted and adapted for Knowsley Metropolitan Borough Council with the consent of Buckinghamshire County Council (December 2006).

1. INTRODUCTION

- 1.1 Swimming is an important life skill. In addition it is a highly beneficial activity for acquiring an increased movement vocabulary and skills, for health, for enjoyment and as a threshold skill, giving access to many other water-based recreational activities. It is one of the few activities that people can enjoy all their life either on their own or with friends and family of the same or different ages, whether just for fun or competitively. We owe it to our youngsters to give them the best chance to learn to swim, as well and as early as possible.
- 1.2 Nonetheless, it is one of the few recreational or teaching activities which also carries with it the evident hazards of death through drowning or injury by brain damage through near drowning. The teaching and learning of swimming and water safety therefore requires the utmost care on the part of all concerned.
- 1.3 The purpose of this document is to provide guidance on safe practice in school swimming, whether at a school pool, hydrotherapy pool or public pool.
- 1.4 Each school whose pupils take part in swimming has a responsibility to ensure that it takes action to safeguard staff and pupils. It should be aware of:
- the Risk Assessment for the pool and session used
 - the Normal Operating Procedure (NOP)
 - the Emergency Action Plan (EAP)
 - conditions of hire - if relevant
 - pool rules
 - any special needs or medical conditions of pupils.
- 1.5 This document sets out the policies and procedures of Knowsley Metropolitan Borough Council in relation to swimming pool safety. The Appendices contain model procedures and forms which must be made specific to each school pool.
- 1.6 References:

All schools with their own pools should have a copy of HSG 179 “Managing Health & Safety in Swimming Pools” 3rd Edition 2003, obtainable from the HSE @ £10.95 + P & P; telephone 01787 – 881165

All schools should have a copy of “Safe Practice in Physical Education and School Sport” BAALPE 2004 Edition, details further guidance on safety issues including swimming; telephone 01384 - 813706/7

“Safe Supervision” ISRM 2001, £3.00 inc P & P, covers ratios of staff to pupils and the qualifications required for teachers and lifeguards; telephone 01509 - 226474

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

Refer also to the DfES & DCMS “Swimming Charter” - support for swimming as a strand of National PE, School Sport and Club Links Strategy (PESSCL)

2. RESPONSIBILITIES

2.1 Overall County Council responsibility

Knowsley Metropolitan Borough Council has responsibility for ensuring safety in swimming in schools where it is the employer. As part of this responsibility the Council provides the safety policy, guidance and procedures for swimming, and ensures that its employees receive any necessary training to carry out their delegated tasks.

In Foundation and Voluntary Aided schools the Governing Body holds this responsibility.

2.2 School responsibility

The Governing Body should ensure that a nominated member of staff is delegated the responsibility of swimming coordinator and applying the swimming pool safety policy and procedures in the school. This will include the proper operation of the school's own swimming facility or use of a third party pool. It also includes monitoring and recording, for the pool and sessions used, of the

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

2.3 Teaching staff

Teachers have a duty of care that operates for any activity in which children are involved; teachers cannot transfer that duty of care to anyone else. The law has often described this responsibility as equivalent to the standard expected of a reasonable and careful parent. This applies to all activities within the school curriculum and to extra-curricular activities organised by the school during and outside school hours, whether on or off the school site.

In relation to swimming this means that:

- children are appropriately supervised when changing
- pupils are under control at all times
- a headcount is taken before, during and after sessions
- normal and emergency procedures are enforced
- teachers have an overview of the teaching of their children and the conduct of the class.

Primary school teachers should accompany their own class to swimming whenever possible, because of the special knowledge they have of their pupils.

2.4 **Adults other than teachers**

Adults other than teachers (AOTTs) can be extremely helpful and may be absolutely essential, to support the delivery of swimming in school and in the extended curriculum, whether on or off site. They can:

- support and work beside teachers
- supervise changing
- administer first aid
- look after any unwell children or children who are not swimming.

Teachers cannot transfer their duty of care to AOTTs but where AOTTs have swimming teaching qualifications they may be involved in the teaching of swimming.

Higher Level Teaching Assistants who have the required specific competencies may replace a teacher who does not, so long as there is always another teacher present on poolside teaching with the group. The pool environment is more isolated than a classroom where they can more easily call upon qualified teacher support if required.

AOTTs should be vetted by the Criminal Records Bureau to work with children.

2.5 **Specialist swimming teachers and swimming instructors**

Specialist swimming teachers are teachers with Qualified Teacher Status who also hold an Amateur Swimming Association (ASA) swimming teaching qualification.

Swimming instructors will hold a relevant ASA teaching qualification and may be employed by a public pool or employed by a school to teach in their own pool.

Both have responsibility for ensuring the safe conduct of the class in the water and on poolside, in line with good practice and their training which includes:

- planning, developing and monitoring the swimming programme
- preparing schemes of work appropriate to pupils' ages, abilities and interests
- co-operating with the class teacher to check numbers of pupils before, during and after each session
- identifying specific groups for each swimming session
- being familiar with the Normal Operating Procedure (NOP) & Emergency Action Plan (EAP) for the pool
- being familiar with the emergency equipment provided
- running emergency drills every term with each class taught
- working with the lifeguards on duty or, if there are no lifeguards, providing lifesaving and first aid skills on their own or with others
- entering the water and effecting a rescue if necessary.

They must be vetted by the Criminal Records Bureau to work with children.

They will organise non-specialist class teaching staff who maintain their duty of care for the children. Ideally a specialist or fully qualified teacher should always be present when children are being taught swimming.

In School Learner Pools

In small shallow water (1.2m and under) school learner pools it may not be practical to have a specialist swimming teacher or instructor of swimming present. In these circumstances the class teacher, trained to teach swimming, may be the only teacher present and will take on the responsibilities of the specialist teacher. They should not, however, work alone.

2.6 Lifeguards

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

in a school pool	this must be a teacher, the swimming teacher or an AOTT
in a public pool	this must be a qualified pool lifeguard
in a private pool	this must be a qualified lifeguard, a teacher, the swimming teacher or an AOTT
hydrotherapy pool	this must be specialist staff, a teacher, the swimming teacher or an AOTT

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

- be familiar with the pool NOP & EAP
- maintain constant observation of the pool and pool users
- carry out rescues and initiate any other emergency action required
- be able to effect a rescue from the bottom of the deepest part of the pool
- administer first aid
- prevent unsafe activities
- ensure that the pool is never left unsupervised whilst in use
- assist in the running of emergency drills
- secure the pool against unauthorised access when not in use
- communicate with children and/or teaching staff to achieve the above.

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

N.B. A teacher of swimming who is also responsible for life guarding should not work alone. Another person should assist with teaching a group of children or assist the teacher with a rescue and first aid, as well as looking after the rest of the children in the event of the teacher having to effect a rescue.

3. TEACHER TO PUPIL RATIOS

- 3.1 Each pool will have a designated maximum bather capacity appropriate to the size of the pool which should be specified in the Normal Operating Procedure.
- 3.2 Irrespective of the ratio there must always be at least 2 supervisors present on the poolside. Pupil/teacher ratios must not exceed 20:1 and for the vast majority of cases in primary school swimming should be less than this. The following ratios are based upon safety considerations rather than teaching requirements:

Adult and baby groups 12:1

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

Non-swimmers and beginners 12:1

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

Children under the age of seven 12:1

Irrespective of their swimming ability, group size should be restricted.

Improving swimmers 20:1

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

Mixed ability groups 20:1

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

Competent swimmers 20:1

Those swimmers who can swim at least 25 metres competently and unaided on front and back, and can tread water for 2 minutes.

Competitive swimmers 30:1

Training only with very competent swimmers.

Specialist swimming activities - various

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

Swimmers with disabilities 1 - 8:1 (with an appropriate number of helpers)

Each situation must be considered individually as people with disabilities are not a homogeneous group. Care must be taken to ensure that there are sufficient helpers in the water to provide a 1:1 ratio for those needing constant support and a sufficient number of other helpers to provide the degree of support required by the range of disabilities within the group. There are national organisations for specific disabilities from which further guidance may be obtained. Individual risk assessments must be undertaken so that the teacher in charge of swimmers with disabilities can be aware of the particular needs of each child.

The Disability Discrimination Act ensures that disabled persons may not be treated less well than any other person. Policies and procedures or physical changes to the environment may need to be put in place for children with disabilities to swim.

4. SUPERVISION OF CHANGING ROOMS

4.1 Children should be supervised whilst changing:

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

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

4.3 In public pools

4.3.1 Ideally children will change in separate “school changing areas” as it is not desirable for members of the public to share changing provision with school pupils.

Pool operators should be asked, wherever possible, to make arrangements for separate areas or times to enable this to happen. Where this cannot be achieved appropriate supervision arrangements need to be agreed between the pool and school.

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

4.4 In school pools

4.4.1 Children will be able to change without members of the public being present.

4.4.2 The arrangements for the supervision of children should be as for paragraph 4.1 and 4.2 above.

5. LIFEGUARD PROVISION

5.1 Someone must always have the responsibility for life guarding / rescue and resuscitation, and must be suitably trained and qualified in accordance with the circumstances applying:

5.2 In a public pool or school pool with deep water:

5.2.1 Programmed session

In programmed sessions (such as teaching, coaching and other tuition) the degree of control inherently in place is likely to reduce the risks. The necessary safety cover may be provided by a teacher, provided they have the appropriate qualifications to teach and life-save, teaching ratios are appropriate and another competent adult is present.

MINIMUM QUALIFICATION: ROYAL LIFE SAVING SOCIETY (RLSS) TEACHERS RESCUE COURSE

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

The life guarding arrangements need to be agreed with the pool management within their conditions of hire.

5.2.2 Un-programmed session

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

MINIMUM QUALIFICATION: NATIONAL POOL LIFEGUARD QUALIFICATION (NPLQ)

Un-programmed sessions should not be run unless an NPLQ lifeguard is in place, supported by teaching staff working as part of a lifeguard team to supervise pre-determined zoned areas in line with the NOP for the pool. School staff and AOTTs will need to be trained to do this and should work under the direction of the qualified pool lifeguard staff.

5.2.3 Mixed programmed and un-programmed sessions

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

MINIMUM QUALIFICATION: RLSS TEACHERS RESCUE COURSE

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

MINIMUM QUALIFICATION: NATIONAL POOL LIFEGUARD QUALIFICATION

5.3 In school shallow water learner pools:

5.3.1 Programmed session

In programmed sessions (such as teaching, coaching and other tuition) the degree of control inherently in place is likely to reduce the risks and this safety cover may be provided by a teacher provided they have the appropriate qualifications to teach, apply first aid and effect a rescue and have appropriate support for the number of pupils being taught. A teacher should not be working on her/his own in the pool.

MINIMUM QUALIFICATION: COUNTY RESCUE COURSE

5.3.2 Un-programmed session

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

MINIMUM QUALIFICATION: NATIONAL POOL LIFEGUARD QUALIFICATION

Un-programmed sessions should not be run unless an NPLQ lifeguard is in position, supported by teaching staff working as part of a lifeguard team to supervise pre-determined zoned areas in line with the NOP for the pool. School staff will need training to do this and should work under the direction of the qualified pool lifeguard.

5.4 Training courses

5.4.1 County Rescue Courses

County Rescue Courses will be run each year in order that all teachers new to the pool or newly recruited AOTTs working at a pool can be brought up to the minimum standards for rescues in a pool.

Additionally a drill should be run with every class (pupils and teachers) at every pool on the first lesson of each term to practice an emergency evacuation of the pool and to ensure familiarity with the pool alarm and emergency procedures.

5.4.2 Training competencies

A prerequisite of the Rescue Course is that staff must hold a current Emergency Aid Certificate.

The County Rescue Course will cover:

- pool routine, NOP and EAP and awareness of risk factors
- the application of expired air and cardio-pulmonary resuscitation in the water and on poolside
- initiation of emergency procedures
- recognition of a pupil in difficulties
- a rescue using reaching equipment

- a simulated rescue from the bottom of the deepest part of the pool at which they work.

5.4.3 **RLSS Teachers Rescue Course**

This is a 12-hour RLSS / ASA training course which includes theory and practical work, and covers the competencies and skill that enable teachers / supervisors to deal with an emergency in a pool. A section is devoted to first aid and it has a validity of two years.

5.4.4 **National Pool Lifeguard Qualification**

This is a 38-hour RLSS / ISRM qualification designed to equip lifeguards to supervise public recreational swimming, to implement safe practice, to operate the EAP and perform first aid if required. To maintain their qualification the NPLQ qualified lifeguard must also undertake regular monthly ongoing training and skills practice.

6. **QUALIFICATIONS**

- 6.1 It is essential that for all school swimming lessons a class teacher always accompanies the class to the pool.
- 6.2 Teachers, Teaching Assistants (TAs), Higher Level Teaching Assistants (HLTAs) and AOTTs who cannot swim should not teach swimming but have a pastoral role on poolside.
- 6.3 It is essential that for all school swimming sessions, provision is made for lifesaving, first aid and resuscitation cover. If the pool provides a lifeguard, that lifeguard should hold a valid National Pool Lifeguard Qualification. This covers lifesaving, life guarding and first aid (including resuscitation) skills. If no lifeguard is provided alternative and satisfactory arrangements, in line with this policy document, must be made. This is likely to be the case at most school pools. (See paragraphs 5.2, 5.6 and 6.18)
- 6.4 Ideally the best qualified swimming teacher/instructor should teach the least able pupils. However this will need to take into account the ability of all staff in the team to effect a rescue (if necessary) at the depth of water at which they are working.

6.5 **In school pools**

6.5.1 **Specialist teachers of swimming**

6.5.1.1 Specialist teachers or instructors of swimming will hold as a minimum qualification:

- ASA Teacher Certificate and
- RLSS Rescue Test for Teachers obtained within the past 2 years.

6.5.1.2 Where teaching specialist groups, additional qualifications may be required appropriate to the group, for example:

- ASA Teacher for Swimmers with Disabilities

6.5.1.3 If supervising an un-programmed session the teacher or instructor must hold a current NPLQ.

6.5.1.4 Specialist teachers should keep their qualifications updated by attending a CPD course every two years.

6.5.2 **Class teachers**

Where a class teacher is conducting a swimming lesson without a specialist teacher or instructor of swimming present, that teacher must be qualified to do so.

6.5.2.1 **In a pool with deep water** the class teacher should as a minimum hold:

- ASA Teacher's Certificate AND
- RLSS Rescue Test for Teachers¹ obtained within the previous two years

Class teachers should never teach swimming without at least one other person present to assist with first aid and rescues if necessary. The numbers and level of support will depend upon the circumstances.

6.5.2.2 **In a shallow water learner pool or where there is a specialist swimming teacher** the class teacher must be able to effect a rescue from the bottom of the deepest part of that area of the pool in which they are teaching and will have attended within the previous two years:

- A county-based course on swimming teaching principles
- A county rescue course

Class teachers will be expected to develop their skills with supplementary training leading to a formal basic swimming teaching qualification within two years of the initial training.

6.5.3 **TAs and HLTAs**

Where TAs or HLTAs are assisting with a swimming lesson they must be qualified to do so.

6.5.3.1 **In a pool with deep water** they should as a minimum hold:

- a county-based course on swimming teaching principles

6.5.3.2 **In a shallow water learner pool or where there is a specialist swimming teacher** they must be able to effect a rescue from the bottom of the deepest part of that area of the pool in which they are teaching and will have attended within the past two years:

- a county-based course on swimming teaching principles
- a county rescue course

¹ This is a lesser qualification than the NPLQ but is specific for its purpose and includes basic resuscitation.

TAs and HLTAs will be expected to develop their skills with supplementary training leading to a formal basic swimming teaching qualification within two years of the initial training.

6.5.4 **Adults other than teachers (AOTTs)**

Where an adult other than a teacher assists with swimming they should be given a clear understanding of what is expected of them.

If expected to help with the teaching on poolside under the direction of the class teacher, they should be able to effect a rescue at the depth of water in the pool area in which they are working and to have some knowledge or understanding of the principles of teaching swimming. As a minimum they will have attended within the previous two years:

- a county rescue course
- an ASA Helpers Certificate

The ASA "Helpers Certificate" provides basic technical knowledge, an awareness and understanding of some of the health and safety issues, and guidance in how best to assist the designated teacher of swimming.

6.5.5 **Lifeguards**

Lifeguards should hold a valid RLSS/ISRM National Pool Lifeguard Qualification (NPLQ) achieved within the previous two years and kept up to date through a regular monthly programme of training and practice.

6.6 **In public pools**

6.6.1 It is expected that there would be a specialist teacher or instructor of swimming and that the role of the class teacher and other accompanying school staff will be to work under the direction of that person.

6.6.2 **Specialist teachers of swimming**

6.6.2.1 Specialist teachers or instructors of swimming will hold as a minimum qualification:

- ASA Teacher Certificate and
- RLSS Rescue Test for Teachers obtained within the previous 2 years.

6.6.2.2 Where teaching specialist groups additional qualifications may be required appropriate to the group, for example:

- ASA Teacher for Swimmers with Disabilities

6.6.2.3 If supervising an un-programmed session the teacher or instructor must have an NPLQ.

6.6.3 **Class teacher**

Where a lifeguard is on duty or the teacher is working under the direction of a specialist swimming teacher the class teacher should have swimming teacher training, initially:

- A county-based course on swimming teaching principles

Class teachers will be expected to develop their skills with supplementary training leading to a formal basic swimming teaching qualification within two years of the initial training.

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

6.6.4 **Adults other than teachers (AOTTs)**

Where an adult other than a teacher assists with swimming they should be given a clear understanding of what is expected of them.

If expected to help with the teaching on poolside under the direction of the specialist swimming teacher, they should be able to effect a rescue at the depth of water in the pool area in which they are working and to have some knowledge or understanding of the principles of teaching swimming. As a minimum he/she will have:

- an ASA Helper's Certificate
- undergone the same induction course as that class teacher for the pool's NOP and EAP

6.6.5 **Lifeguards**

Lifeguards should hold a valid RLSS/ISRM National Pool Lifeguard Qualification (NPLQ) achieved within the previous two years and kept up to date through a regular programme of training and practice.

7. POOL PLANT OPERATION AND POOL MANAGEMENT

7.1 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.

7.2 Pool plant operators

7.2.1 Pool plant operators should be qualified by the ISRM Pool Carers Course, 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 keep the water clear so that pool users can be seen under the water and to operate a simple school pool plant safely and effectively.

7.2.2 This qualification has a three year life and can be re-validated by a one day course refresher and updating course.

7.2.3 A one day foundation or introductory course is available and may be sufficient for managers of caretakers undertaking a pool plant operator role or as an introduction to newcomers to these responsibilities. It is important that persons responsible for pool plant operators are aware of what is required of pool plant operators and can monitor their work.

7.3 Pool Managers

- 7.3.1 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.
- 7.3.2 ISRM offer a range of operational and supervisory short courses and other management courses which can be tailored to school needs. Where the public use school pools for recreational swimming, operational management skills will be essential.
- 7.3.3 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 the Council (see "Contacts" page 31).

7.4 In public pools

- 7.4.1 Standards should be to the ISRM National Pool Plant Operators course.
- 7.4.2 Schools are not required to satisfy themselves as to the qualifications of those managing the pool and plant at pools where they swim, but if there is any concern with regard to pool safety (including the clarity and quality of the pool water) this should be reported to the manager of the pool.
- 7.4.3 Public pools are normally checked by the local environmental health officers. Pools in private houses are not generally checked and are only suitable for domestic use by family and friends and should not be used by schools.

8. RECORDS

- 8.1 Records of all qualifications of those involved in the teaching of swimming must be maintained, kept up to date and available for inspection if required. The person responsible for this is the designated person in charge of school swimming.
- 8.2 Records of incidents and accidents that occur in the swimming pool or pool area should also be maintained and should be available for inspection. An annual review of these will assist with the review of the risks associated with school swimming.
- 8.3 Records should also be kept of pool water tests taken in school pools. These should be tested manually at least twice a day, four times if used by the public as well. Records should be available for inspection if required. They should be signed by the person taking the test.

SUMMARY OF MINIMUM QUALIFICATIONS

ROLE	TEACHING QUALIFICATION	LIFEGUARD QUALIFICATION
Swimming Teacher/Instructor	ASA Teacher (Level 2)	RLSS National Rescue Test for Teachers & Coaches Or none if an NPLQ lifeguard is provided by the pool
Swimming Teacher/Instructor for swimmers with disabilities	ASA Teacher (Disabilities)	RLSS National Rescue Test for Supervisors of Swimmers with Disabilities County rescue course Or none if an NPLQ lifeguard is provided by the pool
Class teacher assisting Specialist teacher	County-based course	County rescue course Or none with NPLQ Lifeguard
Class teacher working in a shallow water learner pool (no specialist teacher or lifeguard)	County-based course	RLSS National Rescue Test for Teachers & Coaches Or County rescue course
TAs and HLTAs	County-based course Or ASA Helper's Certificate	RLSS Emergency response Or County rescue course Or none with NPLQ Lifeguard
AOTTs	ASA Helpers Certificate	County rescue course Or none with NPLQ Lifeguard
Lifeguard for un-programmed sessions		RLSS National Pool Lifeguard Qualification
<i>NB Lifesaving and life guarding qualifications are valid for 2 years</i>		
Plant Operation	Foundation Pool Plant Operators Course (ISRM) School Pool Carer's Course (ISRM) National Pool Plant Operators Course (ISRM)	
<i>NB Pool Plant Operators qualifications are valid for 3 years</i>		
Pool Operation	ISRM Operations Certificate or equivalent; leading to ISRM Supervisory Management Certificate or equivalent	

FURTHER INFORMATION ON SWIMMING TEACHING QUALIFICATIONS

ASA qualifications and courses are available at an introductory level for teachers wishing to gain a swimming teachers' award.

- **ASA Helpers Certificate for AOTTs (7 hours)**
Designed to equip an adult other than a teacher with the skills required to assist the designated swimming teacher within the school swimming teaching programme
- **ASA National Curriculum Training Programme Module 1 (7 hours)**
Designed to equip a qualified teacher to work under a specialist swimming instructor or holder of the Primary School Teachers Certificate to teach swimming
- **ASA National Curriculum Training Programme Module 2 (10 hours)**
Tops up the Module 1 course and equips the teacher to teach without additional supervision - does not cover any rescue or lifesaving
- **ASA Primary School Teacher Certificate for the Teaching of Swimming (17 hours)**
Covers both of the above
- **ASA Assistant Teachers Course Level 1 (27½ hours)**
To assist an ASA Teacher working with small groups
- **ASA Teachers Certificate Level 2 (7 units 54½ hours)**
Competent to organise a programme and organise others.

FULL DETAILS AVAILABLE ONLINE www.britishswimming.org

FURTHER INFORMATION ON POOL PLANT OPERATION

HSG 179 'Managing Health & Safety in Swimming Pools' 3rd Edition 2003 contains guidance on pool plant operation. A copy of this has been provided to all schools. Further copies can be obtained as required (see section 1.6)

SUMMARY OF SUPERVISION NUMBERS

Situation	Total Number of Supervisors Required	Minimum Number of Rescue Qualifications
20 non-swimming pupils in a shallow school pool (1.2m or less)	One class teacher plus one other "spotter"	2 @ County test or above
A class of 30 non-swimming pupils in a shallow school pool (1.2m or less)	At least one class teacher plus two others teaching a group. All "spotting" for children in difficulties	3 @ County test or above
A group of pupils with disabilities in any pool	Determined by risk assessment	
A class of 30 non-swimming pupils in a school or public pool with deep water and with no lifeguard on duty	Class teacher qualified to teach swimming plus two others teaching a group, with all staff "spotting"	1 @ RLSS Rescue test for teachers or above 2 @ County test or above
A class of 30 non-swimming pupils in a public pool with a lifeguard on general duty and public swimming	Class teacher qualified to teach swimming plus two others teaching a group, with all staff "spotting"	1 @ RLSS Rescue test for teachers or above 2 @ County test or above
A class of 30 pupils in a public pool with a lifeguard dedicated to them	Class teacher plus two others teaching a group,	None
20 competent swimming pupils in a shallow school pool in an extra curriculum club training session	2 competent adults	2 @ County test or above
20 competent swimming pupils in a recreational swim session in any pool	One lifeguard, plus one other or adjacent backup	1 @ NPLQ

9. RISK ASSESSMENT

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

9.2 School pools

9.2.1 Where a pool is on a school site, the host school has a responsibility to undertake a risk assessment:

- to identify the hazards that might be present at the pool
- to quantify the risks
- to take steps to eliminate and control risks by:
 - drawing up a Normal (safe) Operating Procedure (NOP)
 - drawing up an Emergency Action Plan (EAP)
- to ensure that hirers or other users are aware of the risks identified and the steps required to control them and to do a practical induction of relevant aspects of the NOP & EAP

9.2.2 Teachers will be expected to undertake an unwritten risk assessment, each time they attend the pool, of the situation at that time and to take action to control any identified risks. These will take into account:

- the age and ability of the children in each class
- the activities they will be undertaking
- the qualifications of the people leading and supporting the session.

Any specific risks will be covered in Individual Education Plans (IEPs) or contained within the teacher's lesson plans.

9.3 Public pools

9.3.1 Where public pools are used regularly for swimming lessons the Pool Manager should arrange an induction course on the NOP and EAP to ensure that all staff are clear about how the pool operates and the role they will have to play in an emergency.

9.3.2 The school swimming co-ordinator will:

- obtain a copy of the NOP & EAP for the pool - this should be made available with the Conditions for Hire or hiring arrangements by the pool management.
- make this available to all staff and AOTTs who are involved in school swimming sessions at the pool. This should be re-issued periodically when reviewed but the school may wish to check, annually, with the pool management that it has not changed.

- ensure the risk assessments for each session (7.2.b) have been carried out by the teacher in charge of the session.
- record staff training in the implementation of the NOP and EAP. It is important that arrangements are made for a practical induction whenever new staff attend at the pool. It is the responsibility of the school to inform the pool of any new staff attending.

9.4 **Hydrotherapy pools**

Water-based activity in hydrotherapy pools requires higher levels of supervision, often on a one-to-one basis in the water. These are not deep water pools and so, for teachers and physiotherapists, the County Rescue Test is an appropriate qualification for life guarding the pool. Adults in the water are only able to supervise the swimmer they are assisting and should not be counted in the supervising ratios. The life guarding duties must be carried out by qualified people on the side of the pool.

Physiotherapists should have completed a course in managing hydrotherapy activities.

There are no national qualifications for teaching swimming activities to children who have severe learning difficulties. A variety of skills are required stemming from an assessment of each child's individual requirements. Schools with hydrotherapy pools should establish an apprenticeship programme for new teachers to work with experienced staff before they take full responsibility for swimming sessions. This induction can take place within or between schools.

9.5 **Using pools on Educational Visits**

Where school parties use swimming pools as part of an educational visit the above conditions should still be applied.

Use is likely to be of a recreational nature. A qualified lifeguard must be on duty and teachers must work with the lifeguard to supervise the session. They should not stand together, or sit talking on poolside but should actively work together as part of a team safeguarding all the children.

If the pool has no lifeguard cover and the school is providing its own lifeguard, arrangements should be made to ensure sole use of the pool, so that other guests do not increase the numbers in the water.

Where the life guarding duty is given to an appropriately qualified student, the teacher will retain overall supervision responsibilities to guarantee appropriate levels of behaviour and adherence to pool rules.

9.6 **Open water**

Open inland water such as rivers, lakes, reservoirs or canals present unacceptable levels of risk. These include vegetation and other underwater obstructions, sudden changes in depth and pollution.

The only exception will be where swimming takes place as part of a watersports activity such as canoeing, windsurfing or rafting, supervised in accordance with the County Council's Educational Visits Policy.

If the open water is a recognised bathing place, then the safety rules relevant to sea bathing must apply.

9.7 **Swimming and paddling in the sea**

Swimming in the sea is considerably less safe than in a swimming pool. Safety can be further reduced when adverse conditions apply - bad weather, low temperatures and any undertow, and in these conditions should be avoided.

The risk assessment should take into account the need for:

- a minimum of two staff and ratio of 8:1 children to staff
- a qualified beach lifeguard watching the group from the edge
- an additional person able to do resuscitation
- thorough knowledge of conditions on the beach
- an agreed and restricted swimming/paddling area and depth within the permitted swimming zone. Dependant upon:
 - * age / swimming ability / conditions / safety provision
- emergency signals, both visual and audible, to be given to the group and the need for:
 - * whistle / first aid equipment / lifesaving items
- The ability to account for all pupils at all times

9.8 **Swimming attire**

9.8.1 Pupils should wear appropriate costumes for swimming that conform to safety, cultural and teaching requirements. It is important that swimming clothing is relatively tight fitting so as to minimise the effect of drag that water logged clothing can create. Sensitivity is required to ensure:

- the correct balance when cultural demands require looser fitting garments
- the need to be able to see the movements that limbs and joints are making in the water to ensure appropriate learning

9.8.2 Pupils should not be excluded from swimming because of verrucae or similar foot infections. Swimming can continue provided a verruca sock covers the infected area.

9.8.3 Children who swim frequently or whose eyes are susceptible to irritation may request to use goggles for swimming. Parents should be informed of their responsibility to teach their child to put on and take off goggles in the correct and safe fashion. The following paragraph would be a suitable insert in a letter to parents:

‘Please ensure that goggles are of a good quality. Please read the manufacturer’s instructions for putting them on and taking them off. This is important to ensure protection of eyes from impact damage through stretching the eyepieces away from the face with wet fingers. You should be

aware that on occasions your child will be asked to remove their goggles in order to safely perform certain aquatic activities'

10. NORMAL OPERATING PROCEDURE (NOP)

10.1 Schools with their own pools will need to draw up or review their own risk assessment as a basis for writing down the safe operating procedures for their pool. This will include the Normal Operating Procedure (NOP) to maintain safety and an Emergency Action Plan (EAP), detailing exactly what everyone does if an emergency occurs.

10.2 Schools using other people's pools will need to be aware of the NOP in order to ensure that they do what is expected of them to keep themselves and others safe, and aware of the EAP to know what to do in an emergency.

10.3 Staff will need to be trained to follow the safety rules included in these procedures and should practice emergency procedures at the start of each term with the children in their classes.

10.4 Training in the NOP and EAP should be recorded by the school, signed by the person giving the training and records kept for a period of at least one year.

10.5 For schools with pools - drawing up an NOP

- **draw a plan of the pool**, noting dimensions and depths; features and equipment; entries and the emergency exit routes; pool alarms; fire alarms and any other relevant information. Include the pool address, telephone number and name of the responsible person and describe how the pool is to be managed and used. Enter the maximum pool bather capacity
- **list the key hazards** to alert users to things they need to be aware of and hazards to be avoided. This is the basis for the NOP
- **record communications methods:** rules for safety; arrangements for passing on safety messages to any users; any policies or pool rules or access rules for controlling groups or individuals, and procedures for the enforcement of safety rules
- **rules of supervision:** ratios of staff to pupils; qualifications of staff; arrangements for life guarding; training arrangements and frequency; what helpers should be doing; how and what to observe in the pool and where to be positioned
- **systems of work and operational systems:** lines of supervision; regular checks on pool safety to be carried out; maximum times for lifeguard to be on the pool and any other control and safety systems in place.
- **detailed work instructions:** for instance for pool cleaning; pool plant operation; pool testing; chemical safety; setting up equipment; use of equipment
- **first aid supplies and training** including the equipment to be provided and its location; arrangements for checking contents and replenishing stock; first aiders; first aid training; disposal of sharps; dealing with blood and vomit spillage and the reporting and recording of incidents and accidents.

- **details of alarm systems and other emergency equipment:** their location; operation; arrangements of testing; maintenance and action if sounded
- **conditions of hire:** a copy of a contract for hire showing the duties and responsibilities of each party and arrangements for safety during a hirer's use

**A TEMPLATE TO ASSIST IN THE PREPARATION OF AN NOP IS ATTACHED AT APPENDIX B
INCLUDE IN THE NOP:**

10.6 Teacher position

- 10.6.1 The swimming teacher 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.
- 10.6.2 There may be some circumstances in which it is appropriate for the teacher or a classroom assistant to be in the water supporting individual children, but this would be the exception rather than the rule and only following a careful risk assessment of all the potential factors at play (depth of water, pupil ability, use of flotation aids, size of pool, number and age of pupils, life guarding arrangements).
- 10.6.3 The teacher or assistant 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.
- 10.6.4 When teaching or instructing non-swimmers or weak swimmers in duck diving or underwater swimming the teacher of the group should be positioned on poolside at the point nearest to that activity, but so that they can also see the rest of the class.
- 10.6.5 If there is glare on the pool surface and the bottom of the pool cannot be clearly seen:
- **in an indoor pool** coat or obscure the window letting the light in and/or move to a position so that anything on the bottom of the pool can be seen.
 - **in an outdoor pool** the teacher / lifeguard should position themselves so that the light does not bounce back into their eyes as glare
- 10.6.6 Teachers with a pastoral role (normally teachers who are non-swimmers themselves) and are not involved in teaching swimming should none the less be positioned such that they are able to support the swimming instructor in the control of children but not so as to be in the way of those working on poolside. Their position must be specified in the NOP:
- **in a school pool** this may be on poolside
 - **in a public pool**, unless there is no lifeguard, it is unlikely to be on poolside

10.7 Teacher clothing and equipment

- 10.7.1 Teachers should change into suitable footwear to be able to move easily around poolside and not bring outdoor dirt onto the pool surround on their feet. They should wear clothes suitable to the humidity and temperatures of the pool and appropriate to the possibility of having to go into the pool to rescue a child.
- 10.7.2 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.
- 10.7.3 Teachers should all be equipped with a whistle and familiar with the standard signals used in most pools, to either use their whistle correctly or respond to a whistle communication from someone else:
- **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
 - **one long blast** calls for the pool to be cleared

10.8 Safety Equipment

- 10.8.1 All pools must be equipped with a means of raising an alarm and summoning support in the event of an accident or incident. Ideally this will be an emergency button which activates a siren or a telephone giving direct contact with the emergency services.
- 10.8.2 There should be a long pole at either side of the pool to reach and rescue anyone in difficulties without getting into the water.
- 10.8.3 Adequate buoyancy aids and first aid equipment, including a blanket should be immediately to hand.
- 10.8.4 Pool depths should be clearly marked on the walls of the pool and teachers should explain their significance to pupils, especially beginners. In school open air pools this could be a painted depth line on the fence so that children can stand next to it to see where the water will come up to when they get in.
- 10.8.5 All signs should be compliant with the Safety Signs and Signals Regulations.
- 10.8.6 A pool divider, usually a rope, should normally be positioned to separate deep from shallow water when non-swimmers are present.
- 10.8.7 All pools should be able to be locked off and isolated to prevent unauthorised access when not manned. Failure to achieve this is a major cause of accidents in school and private pools.

10.9 First Aid Arrangements

10.9.1 All schools should make or check the arrangements for first aid.

10.9.1.1 In school pools

There should be a qualified first aider (First Aid at Work) available within call at all times that the pool is in use. This can be a member of school staff or, when hired out to an outside group, the group must be required to provide a first aider.

10.9.1.2 In public and other pools

It is the responsibility of the pool operator to ensure that there is a first aider on site or to ensure that the school provides their own first aider.

10.9.2 In the event of an accident occurring which requires first aid, this must be recorded on the accident form of the pool being used and the school should request a copy for their own records.

10.9.3 Accidents where a pupil is hospitalised should be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1995 (RIDDOR)

11. EMERGENCY ACTION PLANS

11.1 An Emergency Action Plan details what everyone should do in the event of a reasonably foreseeable emergency. This might include:

- overcrowding
- disorderly behaviour
- assault
- lack of water clarity
- fire
- bomb threat
- structural failure
- emission of toxic gases
- serious injury to swimmer
- discovery of a casualty in the pool

11.2 The procedure should explain how to clear the pool and/or evacuate the building / site, the roles of all the staff involved, how to call for help and what help to give to the people involved.

11.3 All staff likely to be involved in this procedure and all outside user group leaders who may be affected need to be trained to ensure their effectiveness in an emergency. This explains the need for all user groups to be aware of the EAP and in a public pool this is an excellent reason for running evacuation drills when the public are using facilities.

11.4 Notices need to be displayed to advise pool users of the arrangements in the event of an emergency.

- 11.5 All school classes should run practice drills during the first lessons of each term in order that both staff and pupils recognise the alarm signal and know how to respond to it.
- 11.6 Exit doors and signs, fire fighting equipment and alarm points need to be checked regularly to ensure that they are working and accessible
- 11.7 All fire doors must be operable without the aid of a key at all times the pool is in use. These should be checked at the start of every day.

A TEMPLATE TO ASSIST IN THE PREPARATION OF AN EAP IS ATTACHED AT APPENDIX C

12. POOL RULES

12.1 The pool rules should be explained to all pupils before their first swimming lesson. Pupils should be reminded at the start of each term, ideally when the emergency procedures are tested and checked with pupils.

- never go onto poolside until a member of staff is present
- do not enter the water until instructed to do so
- no running on poolside
- no chewing gum or eating sweets or other food on poolside
- no shouting or whistling
- no jumping in or diving in, except under instruction
- no pushing others in
- no holding others under the water or deliberately splashing them
- no jewellery to be worn
- no outdoor shoes on poolside
- swim caps to be worn if requested
- to leave the pool on one long blast of the whistle
- all instructions from staff to be obeyed promptly

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

12.3 There may also be rules for lifeguards to follow to ensure that they remain vigilant at all times. Where appropriate* these techniques should also be practiced by school staff in supporting qualified lifeguards.

- never leave the poolside unattended*
- always secure poolside against unauthorised access when it is not manned*
- never turn their backs on the pool or engage in any behaviour which results in not watching the pool when on lifeguard duty*
- divide the area up into zones and use techniques to constantly scan the area, counting heads, watching out for vulnerable or weak swimmers*
- keep alert, move position every five minutes or so - sit, stand, patrol
- rotate off poolside at least once in every hour

13. DIVING

13.1 Additional hazards are created when swimmers are allowed to dive into the pool. These need to be carefully managed.

- teaching diving should only be undertaken by a specialist teacher
- no diving shall be permitted in less than 1.5 metres of water depth or with less than 7.6m forward clearance
- only very flat horizontal dives should be permitted
- diving blocks and stages must conform to Federation International de Natation (FINA) /ASA regulations

14. CONDITIONS OF HIRE

14.1 Pool operators cannot delegate responsibility for what happens in their pools, therefore if a school pool is hired to an outside organisation the school will need to ensure that the outside organisation will use the pool in a safe manner.

14.2 Equally if a school hires a pool from someone else that organisation will need to make sure that the school is supported in the safe use of the pool.

14.3 The mechanism for this is initially the agreement to hire and any conditions of hire imposed by the organisation. The conditions will be re-enforced in the NOP and EAP.

14.4 The agreement to hire should be reviewed at regular intervals - whenever dates and times are confirmed these should be recorded in a signed agreement between the two parties - a simple form, but the hirers should also be given an up to date copy of the relevant NOP and EAP for the facility and any special conditions of hire which might apply to their session.

14.5 Conditions of hire should include:

- the name and address of the organisation hiring the pool
- the name and address of the pool being hired
- the name of the hirer's representative (*the responsible person - first point of contact*) and contact details
- the activity for which the pool is to be hired (*to assess the level of risk and safety rules required by session type*)
- the numbers participating and their age and swimming ability (*where a school hires a pool for a block involving more than one class with different abilities, ideally the form should be completed to show all this information as the equipment/area of the pool used may need to be different for different groups*)
- specific agreement on the respective responsibilities of the hirer and the pool operator (*for instance who will provide the lifeguarding and the level of life guarding provision to be made, child protection issues, staffing levels*)

- details of who is to be responsible for what in the event of an emergency (*normally it is the operator of the pool who is responsible for building related problems and the hirer for emergencies associated with the activities of the group*)
 - any safety advice to be given to swimmers and any specific rules that should be enforced
 - a signature from the hirer that they have received and read copies of the NOP & EAP
 - appropriate third party liability insurance.
- 14.6 Schools operating a free letting procedure to enable children from the school to access extra pool time (for instance PTA summer holiday use) are still bound by the same letting procedures. For unstructured swimming sessions a qualified lifeguard must be present regardless of pool depth. In addition young children require close supervision in the water by an adult over the age of 16:
- 4 years and under in a ratio of 1 adult to 1 child
 - 8 years and under in a ratio no more than 1 adult to 2 children

Schools may find it more expedient to arrange structured swimming sessions with a suitably qualified teacher in charge when the usual curriculum arrangements will apply.

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

15. CHILD PROTECTION

- 15.1 The LEA and the school will have their own child protection procedures and so too should the pool. It is important that the pool procedures relates to those of the LEA. Each school and pool being used by the school should establish a protocol identifying the relationship between their respective procedures. Ideally this should be within the conditions of hire.
- 15.2 Each pool should have a designated person with responsibility for child protection who should liaise with the designated teacher in the event of a concern about a child. The name of this person at the pool should be publicised to school and public users in order that concerns can be reported to them.
- 15.3 All persons working with children should have a CRB Disclosure.
- 15.4 Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise children and that children are safeguarded from members of the public.
- 15.5 When supervising children changing or assisting them with their swimming, pool and school staff and AOTTs should avoid physical contact with children unless it is:
- essential to develop a swimming skill or technique

- to treat an injury
- to prevent an injury
- to meet the requirement of the activity (e.g. Lifesaving)
- to lift or manually support a child with disabilities

In these circumstances the adult should explain the reason for the physical contact to the child. Unless the situation is an emergency the adult should ask the child for permission. If children have disabilities they and their carers need to be involved in deciding what assistance should be offered and the child should be treated with dignity and respect.

- 15.6 Where children sustain an injury and any first aid is administered the parents/carers should be informed as soon as possible. Details should be recorded and retained by the school. Accidents and incidents which occur at a public pool should also be recorded by pool staff on their forms for their records.
- 15.7 In the event of a child needing to be taken to hospital for treatment, a representative from the school should always accompany the child. If this leaves the school group short of staff at the pool then the school should be informed to seek additional staffing for the group. The parent/carer of the child should be informed as soon as possible.
- 15.8 Staff and AOTTs should avoid placing themselves at risk by being alone with a child and should ensure that wherever possible there are other responsible persons around and that they are in public view.

CONTACTS		
	DCS PE & School Sport Manager	0151 443 5731
Alison Wooding	Knowsley Health & Safety Advisor	0151 443 3294
	Advice on Pool Plant	
	Summer/Winterisation	
	Health & Safety Manager	
	Training Pool Plant Management	
	Biological Monitoring	
	Pool Alarms	

WEBSITES	
Amateur Swimming Association	www.britishswimming.org
QCA lesson ideas	www.nc.uk.net/safeswimming
Royal Life Saving Society	www.lifesavers.org.uk
Institute of Sport and Recreation Management	www.isrm.co.uk

Index

accident form	25	hydrotherapy	3, 20
accidents	15, 22, 24	Hydrotherapy pool	6
Accidents	25, 30	ISRM	2, 3, 7, 11, 13, 14, 15, 16
alarm	10, 23, 24, 26	lifeguard	6, 9, 10, 11, 13, 16, 18, 20, 21, 22, 23, 24, 27, 29
AOTTs ...	5, 8, 9, 10, 11, 13, 14, 16, 17, 29, 30	Lifeguards	6, 13, 14
ASA	5, 7, 11, 12, 13, 14, 16, 17, 28	NOP	3, 4, 5, 6, 9, 10, 14, 19, 20, 22, 23, 27, 28, 29
Bomb threat	25	NPLQ	9, 10, 11, 12, 13, 14, 16, 18
child protection.....	8, 28, 29	Paddling	21
class teacher	5, 6, 11, 12, 13, 14, 18	Pool managers	15
Class teachers	12, 14	Pool plant operators	14
clothing	21, 23	pool rules.....	20, 22, 27
contract.....	23	public pools	8, 15, 19, 27
costumes	21	Public pools.....	15, 19
county rescue course.....	12, 13, 16	Public Pools	13
County rescue course	16	ratios	3, 7, 9, 22, 29
County Rescue Courses	10	RATIOS.....	7
CRB.....	8, 29	Records.....	5, 6, 8, 15
depths.....	22, 24	resuscitation	9, 10, 11, 12, 21
disabilities	7, 16, 18, 30	risk assessment.....	3, 18, 19, 21, 22, 23
dive	28	RLSS.....	9, 11, 12, 13, 14, 16, 18
diving	23, 27, 28	Safety Signs	24
EAP ...	3, 4, 5, 6, 10, 11, 14, 19, 20, 22, 25, 26, 28, 29	school pools	8, 11, 14, 15, 25
Educational Visits	20	sea	21
Emergency Aid Certificate	10	signs.....	24, 26
Fire	25	Specialist swimming teachers.....	5
first aid..	5, 6, 10, 11, 12, 21, 22, 24, 25, 30	specialist teacher.....	6, 12, 13, 16, 28
footwear.....	24	supervision	8, 9, 10, 17, 20, 22, 29
glare	23	SUPERVISION.....	8, 18
goggles.....	21	Swimming instructors	5
Governing Body	4	toxic gases	25
H&S	15	underwater	20, 23
hire	3, 4, 9, 23, 27, 28, 29	verruca	21
hired	25, 28	whistle	21, 24, 27
hospital	30		