Safe Practice in School Swimming Policy

June 2018

IN ASSOCIATION WITH

Aylesbury Vale Teaching Partnership
Foreword

I would like to thank the following individuals for their contributions and support in updating this revised edition of the Oxfordshire Safe Practice in School Swimming Policy:

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Schools’ Health & Safety Manager
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For all involved with School Swimming – this can be found on the following websites:
- [Oxfordshire County Council](#)
- [Aylesbury Vale Teaching Partnership (recommended training providers)](#)

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Summary

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

The appendices contain exemplar materials and greater detail on guidance.

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

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

The following policy has been revised and updated by Aylesbury Vale Teaching Partnership for Oxfordshire County Council. It has been through wide consultation involving Oxfordshire Headteachers, Leisure Providers across Bucks and Oxfordshire, Swimming Coordinators, the Bucks Swim Focus Group, Swim England (formerly ASA) and Royal Lifesaving Society (RLSS), to provide a valuable and accurately informed working document. It is intended to inform and support the following:

- Headteachers,
- Governors,
- Teachers in Charge of School Swimming and Water Safety within their school,
- Leisure Providers,
- Swimming Teachers.

Working in partnership will ensure a consistent joined up approach in the planning and delivery of safe, quality School Swimming and Water Safety lessons.

‘Swimming is a very inclusive, health-promoting activity that can be continued for life. Learning to swim and be confident in water not only saves lives but can also provide the essential foundation for individuals to access many water-based recreational activities. Aquatic activities include swimming, Water Safety activities, lifesaving, diving and open-water swimming.’ (AfPE Safe Practice in Physical Education, School Sport and Physical Activity 2016 Edition)

‘Swimming in clothes differs considerably from styles and techniques used in normal swimming lessons. Students should be taught how to conserve energy and body heat through the use of gentle swimming movements and holding particular body positions. Wearing everyday clothing helps simulate real situations.’

(AfPE Safe Practice in Physical Education and School Sport and Physical Activity 2016 9th Edition)

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

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

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

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

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

As a threshold skill, it also gives access to many other water based recreational activities.
Swimming is one of the few activities that people can enjoy all their lives either on their own, with family or friends of the same or different ages, whether just for fun or competitively. We owe it to our youngsters to give them the best chance to learn to swim as well and as early as possible.

Nevertheless, it also carries the risks of death through drowning or injury by brain damage through near drowning. The teaching and learning of swimming and water safety therefore requires the utmost care on the part of all concerned.
Glossary of Terms

AIPE  Association for Physical Education
ASA  Amateur Swimming Association, now renamed Swim England
ASA/FINA  Federation Internationale de Natation also known as International Swimming Federation
ASA/NCTP  National Curriculum Training Programme
ASA/UKCC  United Kingdom Coaching Certificate
AVTP  Aylesbury Vale Teaching Partnership
CIMSPA  Chartered Institute for the Management of Sport and Physical Activity
DBS  Disclosure Barring Service
DfES/CCPR  Department for Education and Skills/Central Council for Physical Education
EAP  Emergency Action Plan
EHO  Environmental Health Officer
HLTA  Higher Level Teaching Assistant
IOS  Institute of Swimming
ISPE  Institute of Swimming Pool Engineers
ISRM  Institute of Sport and Recreation Management
NC  National Curriculum
NOP  Normal Operating Procedure
NPLQ  National Pool Lifeguard Qualification
NRASTC  National Rescue Award for Swimming Teachers and Coaches
OCC  Oxfordshire County Council
PWMC  Pool Water Maintenance Contractor
QCF  Qualification and Credit Framework
RAPs  Register of Aquatic Professionals
RIDDOR  Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013
Definitions

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

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

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

**Specialist Aquatics 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 equivalent.

**Swimming Teacher Assistants:**
Individuals that can work under the supervision of a Specialist Aquatics Teacher, qualified to Swim England (ASA) UKCC Level 1.

**Lifeguard/Lifesaver:**
The individual responsible for lifeguarding, rescue and resuscitation of swimmers in difficulty.
Responsibilities

**Overall County Council Responsibility**

OCC have a responsibility for ensuring safety in swimming in all maintained schools. As part of this responsibility, OCC provides the Safe Practice in School Swimming Policy. AVTP are able to provide some guidance and support for School Swimming and offer a variety of relevant training (please see AVTP website - [http://avtp.co.uk/school-swimming/](http://avtp.co.uk/school-swimming/)).

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

**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 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 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,
- 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 School Swimming folder) – AVTP hold a central database for all staff trained through their courses. Where individuals hold qualifications gained from other providers, they must submit copies of certificates to the OCC Health & Safety Team,
- 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 requesting the pool’s Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) and ensuring that accompanying school staff read these and sign 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 is maintained within the School Swimming Folder,

● Headteachers of schools with pools on their site attending the course entitled Swimming Pool Awareness for Headteachers (Institute for the Management of Sport and Physical Activity IMSPA) - this requires refreshing every 3 years.

Teacher in Charge of School Swimming and Water Safety

● Maintain School Swimming Folder (see Governor and Headteachers section above),

● Visit the pool before swimming programme commences to understand all relevant NOP/EAP aspects, risk assess and plan your programme with your Specialist Swimming Teacher,

● Complete Visit Notification Form – Appendix Q (agreed by Headteacher),

● Undertake Risk Assessments (please refer to page 16 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 & Student Information (including information on pupils with medical conditions and/additional needs; information for Leisure Providers - Appendix P).

Accompanying School Staff

School staff have overall DUTY OF CARE that applies for any activity in which children 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:

● 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 children are appropriately supervised when changing,

● ensure children are under control at all times,

● take head counts before, during and after sessions. This should be recorded in the swimming registers,
● enforce the NOP and EAP; all staff on poolside should be aware of the emergency procedures of any external provision, ensuring that children are aware of what to do in the event of an emergency evacuation,

● remain on poolside to provide an assisting role to support the School Swimming Lesson (they must hold a minimum Swim England Support Teacher of School Swimming Certificate – please refer to the section on Qualifications, page 24),

● hold responsibility for reporting on the progress of School Swimming (through ongoing monitoring and guidance from Leisure Provider staff). Identify those pupils unlikely to meet the minimum requirements for National Curriculum Swimming,

● be aware of the additional needs or medical conditions of the pupils they are teaching so that correct measures/precautions can be put in place with guidance from the Specialist Swimming Teacher.

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

● progress of pupils,

● assessing confidence and competence of accompanying staff (with guidance from Leisure Provider staff),

● enforcement of policies and procedures,

● Sharing of procedures and standards to all School Staff involved in the School Swimming and Water Safety lesson.

When public pools are used for School Swimming, the duty of care remains with the school staff. Specialist Aquatics Teachers may be employed to assist with the teaching of the lesson, but it is essential the school staff remain on poolside.

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

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

Staff should have the opportunity to express a lack of confidence or ability before being deployed in a poolside role. Staff should not be deployed in a poolside role however if they:

● Lack confidence in the role,

● Cannot swim,
● **Are reticent about being on poolside.**


**The Specialist Aquatics Teacher (e.g. Leisure Provider Swimming Teachers)**

(e.g. ASA/Swim England Level 2 or STA equivalent)

**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 children swimming,
- Ensure a suitable and sufficient risk assessment is undertaken for each group involved in swimming activities,
- Be aware of the additional needs and medical conditions of the children in their class, risk assessing these within the context of the swimming environment,
- Ensure the safe conduct of the class whilst the children are in the water and on the poolside,
- Enable children to have fun in and near water,
- Prepare, plan and teach high quality School Swimming and Water Safety lessons in partnership with the school appropriate to the pupils’ age and ability – showing good understanding of National Curriculum requirements,
- Ensure appropriate numbers of fully qualified lifeguards are on poolside,
- Understand their role and responsibility in the case of an emergency (understand the pool’s NOP and EAP,
- Be able to organise a number of other staff (pool staff or School Swimming staff) so that the teaching groups are a ‘best fit’ for the standards and ability stages of the students,
- If in a leisure centre, liaise with the lifeguards and pool centre staff concerning the School Swimming session.

**Normal Operating Procedure (NOP)**

See Appendix D

For some children, School Swimming and Water Safety could be their first experience of being in a swimming pool. It is important that they know and understand the rules of the pool, pool layout and the possible hazards of this new environment.

All school staff must have read and signed to show they understand the Normal Operating Procedure (NOP) for the pool being used for School Swimming, to ensure that they are clear on their role and
responsibilities during normal operations to maintain safety. The School Swimming Checklist (Appendix F) may be a useful document for school staff.

**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)**  
*See Appendix E*

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

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

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

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

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

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

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

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

**All fire doors** must be operable without the aid of a key at all times the pool is in use. These should be checked at the start of every lesson.
Safety equipment such as poles, 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 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 poolside prior to the lesson.

All pools need to have a clear procedure for removing pupils with physical disabilities. Where a pool has a spinal board/special recovery stretcher, staff should receive training in this. It is recommended that special schools have a spinal board on poolside. Training can be provided by Herts Handling.

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 be given to non-swimmers to allow them into water out of their ability depth,
- be appropriate and safe for the needs of students,
- be correctly fitted or held according to the design and purpose of the aid.

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 (2016 Edition) have produced a very useful table shown below:
These are the day-to-day organisational systems based on risk assessment, and would typically include information relating to:

- pool design and depth
- potential areas of risk
- arrangements for lessons
- responsibility for safety
- staffing levels and qualifications
- supervision and student conduct
- arrangements for students with particular needs (e.g. very young children, or those with SEND or medical conditions)
- pool’s safety equipment
- clothing and personal equipment
- maximum numbers
- first aid provision
- water quality

This should establish who assumes leadership in managing emergencies and the action to be taken in relation to such issues as:

- serious injury to bather
- dealing with casualties in the water
- sudden overcrowding in a public pool
- sudden lack of water clarity
- disorderly behaviour
- faecal fouling
- vomit
- blood contamination
- emergency action due to:
  - fire alarm
  - bomb threat
  - power failure
  - structural failure
  - toxic-gas emission

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

**Risk Assessment**

*See Appendix A/B/C for example risk assessment*

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

Swim England, Safe Supervision for Teaching and Coaching Swimming 2017 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 coach 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 Aquatics Teacher with a register, up to date medical information and any other relevant information (e.g. Additional Needs) about the children, at least one week before the swimming programme takes place. The completed register of children present should be updated and handed to the Specialist Aquatics Teacher for them to check before each lesson (see Appendix P).

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

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

If in any doubt about the safety of the lesson, don't proceed.

Public Pools

The school need 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 on the NOP and EAP to ensure that all accompanying school staff are clear about how the pool operates and the role they will have to play in an emergency.

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

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

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

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; and that each Specialist Aquatics Teacher and Accompanying School Staff must be in possession of all medical information one week prior to that child swimming (Swimming class registers including information on pupils with medical conditions and/additional needs - information for Leisure Providers - Appendix P). This will need updating when necessary.

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

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

A child will not be allowed to swim if their medication is not available, unless an emergency salbutamol kit (with a ‘spacer’) is available from the school (refer to Department of Health ‘Guidance on the use of inhalers in Schools’ and Department of Health ‘Guidance on the use of Adrenaline Auto-injectors in Schools’).

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

The requirements for students 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 child has a history of episodes whilst swimming. For children with Epilepsy, an assigned member of staff will need to be given the role of a ‘spotter’.

The student may need to work alongside a responsible person in the water when they are out of their depth. Using a ‘buddy’ system with a student or helper in the water can provide non-intrusive supervision which also avoids embarrassment on behalf of the child.
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.

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

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

Pool Rules

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

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

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

*Only ASA Level 2 / STA Level 2 Certificate in Teaching Aquatics Teachers are qualified to teach diving. Refer to the section on Diving for further clarification.

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

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**School Staff Accompanying Pupils to their School Swimming and Water Safety Lesson**

For all School Swimming and Water Safety lessons, at least 2 members of school appointed staff, who know the children, 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 children in a unique way. There should always be someone on poolside who knows the specific medical or additional needs of the pupils.

To clarify, there should be a minimum of two members of school staff on poolside who are suitably qualified, confident and competent (refer to section on Qualifications, page 24).

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

All school staff accompanying pupils to swimming lessons should:

- **be clear about what their qualification enables them to do and ensure that their qualifications are kept up to date and/or refreshed when required,**
- **make it clear what standard of swimmer they are confident to teach,**
- **demonstrate good knowledge and be able to communicate this clearly to the students,**
- **adapt their approach to suit the needs of different students,**
- **ensure they 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 student: teacher 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 students and that roles and responsibilities regarding water safety cover remain clear and understood.

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

Additionally, they should:

• Understand the limits of the role,

• Be confident on poolside,

• Have the necessary discipline and follow their School Behaviour Policy,

• 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.

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

In order to ensure that School Staff understand their role and are confident and competent, 2 or more members of accompanying School Staff MUST have undertaken, as a minimum, the Swim England Support Teacher of School Swimming and Water Safety (formerly ASA Fundamentals of School Swimming) prior to taking their pupils to School Swimming lessons. They must remain on poolside at all times as they hold duty of care and understand the needs of their pupils. They should alert lifeguards if they have any concerns during the school swimming session. Accompanying School Staff need to work in partnership with Specialist Swimming Teachers. OCC preferred provider for this training is AVTP (Swim England Licensed Tutors) (refer to Contacts on page 53).

Please see the overview of the Swim England National Curriculum Training Programme Certificate for teaching School Swimming and Water Safety on the next page.

For schools with their own pools, it is highly recommended that staff also undertake the Swim England Teacher of School Swimming and Water Safety course (formerly ASA NCTP Aquatic Skills of School Swimming Course), which completes the Swim England National Curriculum Training Programme. The names and dates of staff trained should be kept in the School Swimming Folder. (AVTP holds a database of all Oxfordshire staff they have trained).

<table>
<thead>
<tr>
<th>Primary Delivery Model</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Support Teacher of School Swimming and Water Safety</strong> <em>(6-hour course)</em></td>
</tr>
<tr>
<td>● <strong>Core Module 1</strong></td>
</tr>
<tr>
<td>▪ Roles, responsibilities and relationships</td>
</tr>
<tr>
<td>▪ Health and safety</td>
</tr>
<tr>
<td>▪ Safeguarding and protecting children</td>
</tr>
<tr>
<td>▪ Organisation of the learning environment</td>
</tr>
<tr>
<td>● <strong>Core Module 2</strong></td>
</tr>
<tr>
<td>▪ Physical Development</td>
</tr>
<tr>
<td>▪ Developing key underpinning skills</td>
</tr>
<tr>
<td>▪ Introduction to the strokes</td>
</tr>
<tr>
<td>● <strong>Primary Module 4</strong></td>
</tr>
<tr>
<td>▪ Swimming and Water Safety in the NC</td>
</tr>
<tr>
<td>● <strong>Practical</strong></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th><strong>Teacher of School Swimming and Water Safety</strong> <em>(9-hour course)</em></th>
</tr>
</thead>
<tbody>
<tr>
<td>● <strong>Core Module 3</strong></td>
</tr>
<tr>
<td>▪ Planning and preparing aquatic sessions</td>
</tr>
<tr>
<td>● <strong>Primary Module 4</strong></td>
</tr>
<tr>
<td>▪ Additional skills</td>
</tr>
<tr>
<td>▪ Key aspects of progression, attainment and assessment</td>
</tr>
<tr>
<td>● <strong>Practical Observation</strong></td>
</tr>
<tr>
<td>▪ Candidates teaching pupils</td>
</tr>
</tbody>
</table>

*Where both courses are undertaken together, these courses could be delivered in 2 full days*

<table>
<thead>
<tr>
<th><strong>SECONDARY MODEL</strong>   Support Teacher and Teacher of School Swimming (Combined course - 15 hours: pre-course reading and 1-day course)</th>
</tr>
</thead>
<tbody>
<tr>
<td>● <strong>Core Module 1</strong></td>
</tr>
<tr>
<td>▪ Help support a healthy and safe environment in and around the swimming pool</td>
</tr>
<tr>
<td>▪ Describe the roles and responsibilities of a range of personnel involved in the swimming lesson programme</td>
</tr>
<tr>
<td>▪ Identify good practice with regard to safeguarding and protecting young people</td>
</tr>
<tr>
<td>▪ Help organise and support an effective learning environment</td>
</tr>
<tr>
<td>● <strong>Core Module 2</strong></td>
</tr>
<tr>
<td>▪ Describe what is meant by the term physical literacy</td>
</tr>
<tr>
<td>▪ Outline the principles of movement in the water</td>
</tr>
<tr>
<td>▪ Outline the essential components of the 4 swimming strokes</td>
</tr>
<tr>
<td>▪ Describe a range of essential aquatic skills</td>
</tr>
</tbody>
</table>
Core Module 3
- Identify the key considerations when developing an aquatic session plan
- Create session plans for the delivery of swimming lessons
- Describe the key aspects of communication in relation to delivery - feedback, questioning and skill development
- Review the effectiveness of your planning and delivery to improve participant progression and your development as a teacher

Core Module 4 (Secondary Specific)
- Summarise the key considerations with regard to specific Key Stage 3 and 4 skills in the water
- Identify the stroke expectations in terms of standards of Key Stages 3 and 4 for each of the four strokes
- Summarise the key aspects of Mini Polo, Synchro and Personal Survival and be able to implement these into the overall development of your swimmers

All candidates will receive invaluable resources, including the NCTP Learner Guide and National Curriculum Activity Cards. (Candidates are registered with the Swim England and AVTP database and receive certificates).

Teaching Qualifications Required for School Staff

<table>
<thead>
<tr>
<th>Minimum requirements</th>
<th>Details</th>
<th>Additional information; timings etc</th>
</tr>
</thead>
<tbody>
<tr>
<td>A minimum requirement for all staff accompanying their pupils School Swimming at a Leisure Provider Pool</td>
<td>Swim England Support Teacher of School Swimming and Water Safety (Formerly ASA NCTP Fundamentals of School Swimming) Please refer to page 31 for Lifeguarding Qualifications required</td>
<td>6-hour course including peer practical and theory (alongside, as a minimum another Swim England Support Teacher of Curriculum Swimming and Water Safety trained member of staff)</td>
</tr>
</tbody>
</table>

The holder of Swim England Support Teacher of School Swimming and Water Safety may work under the guidance of a Specialist Swimming Teacher (see ratios on page 28) to actively support and assist

| Minimum requirement for staff teaching swimming at their own shallow tank pool without a Level 2 or equivalent | Swim England Support Teacher of School Swimming and Water Safety (Formerly ASA NCTP Fundamentals of School Swimming) Please refer to page 31 for Lifeguarding Qualifications required | 6-hour course including peer practical and theory (alongside, as a minimum another Swim England Support Teacher of Curriculum Swimming and Water Safety trained member of staff) |

| Highly recommended for staff teaching swimming at their own shallow tank pool without a Level 2 or equivalent | Swim England Teacher of School Swimming and Water Safety (Formerly ASA NCTP Aquatic Skills of School Swimming) Please refer to page 31 for Lifeguarding Qualifications required | 9-hour course including theory and practical using pupils (alongside, as a minimum another Swim England Support Teacher of Curriculum Swimming and Water Safety trained member of staff) |

The holder of Swim England Teacher of School Swimming and Water Safety 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 on poolside with a qualified Level 2 Swimming Teacher.

Swim England recommend completion of both courses. (Please note: this is a combined 1-day course for Secondary PE teachers)
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:

<table>
<thead>
<tr>
<th>Reviewed in 2008</th>
<th>2014</th>
<th>2018</th>
</tr>
</thead>
<tbody>
<tr>
<td>1. ASA Module 1 NCTP</td>
<td>ASA Fundamentals of School Swimming</td>
<td>Swim England Support Teacher of School Swimming and Water Safety</td>
</tr>
<tr>
<td>2. ASA Module 2 NCTP</td>
<td>ASA Aquatic Skills of School Swimming</td>
<td>Swim England Teacher of School Swimming and Water Safety</td>
</tr>
</tbody>
</table>

School Swimming Teaching Scenarios

Based on Swim England qualifications 2018 (see above table for equivalents)

<table>
<thead>
<tr>
<th>Scenario</th>
<th>Required Qualification for School Swimming</th>
<th>Who for?</th>
<th>What does this qualify me to do? / Additional Information</th>
</tr>
</thead>
</table>
| School pool shallower than 1.2m               | Minimum Swim England NCTP Support Teacher of School Swimming and Water Safety (6-hour course) delivered by Swim England Licenced AVTP staff* | At least 2 members of school staff (Teachers, HLTA’s + TA’s) must attend Swim England NCTP Support Teacher of School Swimming and Water Safety Course | This is the minimum requirement for school staff to deliver school-based School Swimming lessons providing: At least 2 members of swimming qualified staff on poolside The group should be no more than 20 pupils or the maximum bather capacity for the pool (found in NOP)  
It is strongly recommended that schools with their own pools also qualify their staff to Teacher of School Swimming and Water Safety which fully completes both parts of the NCTP. |
| Primary School Staff using a pool deeper than 1.2m | At least 1 Swim England Level 2 Certificate for Teaching Aquatics or STA Level 2 Certificate in Swimming Teaching They must be supported by a minimum of 2 members of school staff trained to a minimum level of Support Teacher of | School or Leisure Provider Staff                                        | Work with an absolute upper limit of 20:1 - see Swim England guidance on ratios for qualified Specialist Swimming Teachers Swim England Support Teacher of School Swimming and Water Safety qualified staff work with a ratio 3:1 pupils working under the guidance of a level 2 qualified Specialist Swimming Teacher who is working under Swim England recommended ratios (this ratio will be |
### School Swimming and Water Safety Policy

**School Swimming and Water Safety (6-hour course) delivered by Swim England Licensed AVTP staff**

- dependent on Risk Assessment; e.g. competency and confidence as agreed by the Leisure Provider

| Secondary school PE teachers with a pool deeper than 1.2m | Secondary PE Degree PGCE or Equivalent with: Minimum requirement Teacher of School Swimming Secondary Course (15-hour course - pre-reading plus one day course) delivered by Swim England Licensed AVTP staff* | Alongsie Swim England Level 2 qualified Swimming Teacher Alongsie another Swim England Teacher of School Swimming qualified PE Teacher | Must adhere to Swim England Ratio guidelines i.e. absolute upper limit 20:1 At least 2 qualified members of staff should be on poolside |

#### Considerations - The Risk Assessment is paramount and should determine safe ratios.

Where Primary School Staff qualify their staff in the NCTP Teacher of School Swimming and Water Safety, the ratio moves from 3:1 pupils to 8:1 pupils, still working under the guidance of a level 2 qualified swimming teacher, who is working under the Swim England recommended ratios.

For course outlines or to book onto courses, please contact AVTP School Swimming via Allison Holley on 01296 388222 extension 296 or email swimming@ahs.bucks.sch.uk

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As with all qualifications, it is strongly recommended that all staff keep themselves updated and upskilled. AVTP now offer a 2-hour refresher course to keep school staff up to date.

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 (safety) within Swim England teacher pupil ratios.

### Teacher Pupil Ratios

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,
● student ability,
● the facility, including water depth and un-programmed activities taking place at the same time,
● student behaviour,
● students with special educational 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 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 deduced 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 child who has particular health and safety needs 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 Swim England Teacher of School Swimming and Water Safety trained staff.

In exceptional circumstances, Specialist Swimming Teachers may ask individual children 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 child 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.

Swim England recommend maximum teacher: pupil ratios (please see next page).

Swim England Teacher to Pupil Ratio Guidelines

The ratios outlined below are guidelines set by Swim England for Swimming Teachers holding an 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 considered, including the competency and experience of the Swimming Teacher, Lifeguard provision (if the Teacher is also taking on the role of the Lifeguard), design of the pool and ability of the pupils.
While a minimum number of staff may satisfy ratio requirements, schools need to consider 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 student fatigue (AfPE 2016).

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

**PLEASE PAY PARTICULAR ATTENTION TO THE BOLD TYPE SECTIONS WHEN WRITING YOUR RISK ASSESSMENTS AND JOINTLY PLANNING WITH YOUR LEISURE PROVIDERS –**

<table>
<thead>
<tr>
<th>Ability/age/activity</th>
<th>Baseline Learner/Teacher Ratios</th>
<th>Quality Delivery</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Non-Swimmers and beginners - young children</strong>, normally primary school age, being introduced to swimming who are <strong>unable to swim 10 metres unaided on back or front</strong>.</td>
<td>12:1</td>
<td>8:1</td>
</tr>
<tr>
<td><strong>Children under the age of seven</strong> - Irrespective of their swimming ability, group size should be restricted.</td>
<td>12:1</td>
<td>8:1</td>
</tr>
<tr>
<td><strong>Improving swimmers</strong> - Swimmers of a similar ability to each other who <strong>can swim at least 10 metres competently and unaided on their back and on their front</strong>. It is recommended that the lesson be confined to an area in which the children are not out of their depth.</td>
<td>20:1</td>
<td>12:1</td>
</tr>
<tr>
<td><strong>Mixed ability groups</strong> - Pupils with a range of abilities (from improving to competent) where the <strong>least able and least confident are working well within their depth</strong>. Swimmers techniques, stamina and deep-water experience should be considered. <strong>They should not include beginners.</strong></td>
<td>20:1</td>
<td>12:1</td>
</tr>
<tr>
<td><strong>Competent swimmers</strong> - Those swimmers who can swim at least 25 metres competently and unaided on front and back, and can tread water for two minutes.</td>
<td>20:1</td>
<td>15:1</td>
</tr>
<tr>
<td><strong>Swimmers with disabilities</strong> - Each situation must be considered individually, as people with disabilities are not a homogenous group. Care must be taken to ensure that there are sufficient helpers in the water to provide <strong>1:1 ratio for those needing constant support</strong>, and a sufficient number of other helpers to provide the degree of support required by the range of disabilities within the group.</td>
<td>8:1 with 1:1 support in the water where required</td>
<td>6:1 with 1:1 support in the water where required</td>
</tr>
</tbody>
</table>
Swim England Guidance

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 children who are beginners (unable to swim 10m unaided on their front and back).

For example, where schools are taking children 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.

Where schools take more than 20 pupils swimming; e.g. a class of 30 pupils, the above applies and they will require:

- A minimum of 2 Swim England Level 2 Qualified Swimming Teachers, along with 2 Support Teacher of School Swimming qualified school staff (again, there may be a requirement to employ more qualified swimming teachers and/or bring more school staff, dependent on Risk Assessment).

THE OCC POLICY ON SAFE SWIMMING RATIOS COMPLIES WITH RELEVANT NATIONAL GOVERNING BODIES (May 2018).

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

Swim England recommend that a Support Teacher of School Swimming works with a maximum of 3 pupils, again dependent on confidence, competence and risk assessments, under the guidance and supervision of the qualified Level 2 Swimming Teacher and within Swim England recommended ratios. Schools may well need to employ another qualified Swimming Teacher to meet these ratios.

Swim England recommend that a Teacher of School Swimming works with a maximum of 8 pupils, again dependent on confidence, competence and risk assessments, alongside a qualified Level 2 Swimming Teacher and within the Swim England recommended ratios.

It is strongly recommended that schools with their own pools qualify their staff to Swim England Teacher of School Swimming and Water Safety which fully completes both parts of the NCTP.
AfPE Guidance

Some key points arising from discussions with AfPE:

There should never be only one pair of ‘qualified eyes’ (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.

Lifeguarding Qualifications for School Swimming and Water Safety - Lifeguarding Provision

Pool operators have a responsibility for the safety of all who use their pools. Whenever children 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 NRASTC will be required, whilst in a pool over 1.2M, you must have a minimum of two. In both cases, you will require staff with appropriate teaching qualifications (refer to above section). A minimum of 2 members of school staff qualified to Support Teacher of School Swimming must be on poolside at all times as they hold duty of care and understand the needs of all their pupils. They should alert lifeguards if they have any concerns during the school swimming session. A NRASTC qualified member of staff may also hold the Support Teacher of School Swimming and equally a Support Teacher of School Swimming may also hold a NRASTC qualification.

If fully qualified (to Swim England Level 2 Swimming Teacher or STA Equivalent), in a school pool over 1.2m where the NOP allows, a Swimming Teacher can also be responsible for lifeguarding if they hold an appropriate lifeguarding qualification, when assisted by an additional qualified person (e.g. Secondary PE Teacher with Swim England Teacher of School Swimming and Water Safety Certificate).

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. 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.
## Lifeguarding Qualifications

<table>
<thead>
<tr>
<th>Situation</th>
<th>Lifeguarding Qualification Needed (This will usually be provided by the Leisure Provider)</th>
<th>Information</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>PUBLIC POOL</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>In a public pool</td>
<td>Minimum qualification: National Pool Lifeguard Qualification (NPLQ) or STA Certificate – NaRS Pool Lifeguard</td>
<td>Schools should refer to the pool’s NOP</td>
</tr>
<tr>
<td>In a school pool with deep water (over 1.2m) during a <strong>programmed</strong> session</td>
<td>Minimum qualification: Royal Life Saving Society National Rescue Award for Swimming Teachers and Coaches (NRASTC) or STA Certificate – NaRS Pool Lifeguard</td>
<td>At least 2 qualified members of staff need to be on poolside</td>
</tr>
<tr>
<td>In a school pool with shallow water (less than 1.2m) during a <strong>programmed</strong> session</td>
<td>Royal Life Saving Society National Rescue Award for Swimming Teachers and Coaches (NRASTC) or STA Certificate – NaRS Pool Lifeguard</td>
<td>At least one member of staff with this qualification must be on poolside - a thorough risk assessment will determine whether this needs to be more</td>
</tr>
<tr>
<td>In a school pool with shallow water (less than 1.2m) during an <strong>un-programmed</strong> session</td>
<td>Minimum qualification: National Pool Lifeguard Qualification (NPLQ)</td>
<td>Un-programmed school sessions are prohibited due to their unpredictable nature.</td>
</tr>
</tbody>
</table>

**Please note:** The guidance above states the minimum provision required by Oxfordshire County Council. 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 Not Advised and Should Only Take Place Following a Thorough Risk Assessment.**

(These are defined as any activities including any non-structured swimming session or ‘free play’.)
Schools using Leisure Provider pools:

A Health and Safety talk should be run with every class (pupils and teachers) at every pool on the first lesson of each programme and then regularly or when required, to ensure familiarity with the pool alarm and emergency procedures.

Schools using their own pools:

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

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

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

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

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 teachers (schools and Leisure Providers) must check with their qualifying body whether their qualification covers them to deliver diving.

Please also refer to AfPE Safe Practice in Physical Education School Sport and Physical Activity 2016 Edition, Section 4.1.52 - 4.1.65 for guidance on diving.

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

Diving blocks and stages must conform to FINA/Swim England Regulations.
Where Secondary School Staff are qualified to teach diving (Swim England Level 2 Aquatic Teacher, with diving) please see following guidance from the Association for PE, Safe Practice in PE, School Sport and Physical Activity Handbook 2016, Section 4.1.52 - 4.1.65.

Teaching Self-Rescue and Water Safety

Teaching Self-Rescue

Self-Rescue and Water Safety skills are an important element of School Swimming. Pupils need to understand the effects and dangers of cold water. They should be taught to recognise a range of scenarios and respond safely and appropriately.

Pupils should be given opportunities to wear clothing in water as part of an understanding of a potential situation. They need to be taught how to regulate their breathing in cold water and efficient forms of flotation. They should be taught the key Water Safety messages (age appropriate). Until further guidance is provided by the DfE, key skills that children should learn are:

- Entry with full submersion and resurface (fall-in or step-in entry),
- Float (to regulate breathing),
- Signal for help,
- Swim 15m out, then turn and swim 15m back,
- Tread water,
- Maintain HELP and Huddle,
- Climb out unassisted (without use of the steps where the freeboard is sufficiently small),
- Show understanding of local and national water safety sites and be able to identify when the above skills may be needed.

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.

Teaching Life-saving

Additional 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 developed competence in, self-rescue skills as a requirement of National Curriculum Swimming.

When teaching life-saving, children below 8 years of age should only be taught rescues from the poolside (e.g. shout & signal, throwing, reaching with a pole or similar items).
In-water contact rescues should not be taught to children under 13 years of age apart from when they are taught within a comprehensive Lifesaving Award programme where sufficient additional safety knowledge is learned. Pupils must also be competent, confident and proficient swimmers.

*(Safe Practice in Physical Education School Sport and Physical Activity 2016 Edition 4.1.68)*

Advice on teaching packs and awards for lifesaving at the appropriate key stages in primary and secondary education is available from the RLSS UK (such as Rookie Lifeguard), STA, and Swim England.

**School Swimming Galas**

Schools involved in School Swimming Gala’s should adhere to both AfPE guidance ‘Risk Management Considerations for Centrally Organised Sports Events’ Appendix L and Guidance ‘Considerations for those involved in Primary School Swimming Galas’ Appendix M. These documents include guidance on safety aspects in planning and involvement in the event, including risk assessments. Appendix N also contains an example Swimming Gala Risk Assessment.

**Swimmers with Disabilities**

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 children 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.

Schools may have to consider the following:

- Pool accessibility (i.e. ramps, hoists and changing facilities),
- Increased Teacher: Pupil ratio,
- Assistant/helper in the water,
- Emergency evacuations for pupils with disabilities/spinal injuries.

Please refer to the ASA Guidance for Teaching in the Water – Safeguarding, within Appendix I, for guidance for assistants/helpers in the water.

See Swim England Guidance on Inclusion of Swimmers with a Disability.
Hydrotherapy Pools

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

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). The 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 child’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 and Water Safety course.

Staff supporting in the water should work with experienced staff. This induction can take place within or between schools. The lifeguarding qualification required for hydrotherapy pools is the RLSS Aquatic Therapy Shallow Pool Rescue Award (ATSPRA).

AVTP in conjunction with BCC 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.

Swimming Teacher Position

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.

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, (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, and use of flotation aids, size of pool, number and age of pupils and 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 poolside at the point nearest to that activity, but so that they can also see the rest of the class. When an additional person is in the water assisting, they must be aware of the NOP and Appendix I: Teaching in the Water and The Handling of Children. 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 letting in the light (indoor pool only).
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.

Accompanying school staff, who are not involved in teaching swimming should nonetheless be positioned such that they are able to support the swimming Teacher 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.

Such staff will be in addition to the Swim England Support Teacher of School Swimming and Water Safety qualified members of accompanying school staff, working poolside with the children under the direct supervision of the qualified Swimming Teacher. Care needs to be taken that there are not excessive numbers of adults on the poolside, but that all staff accompanying the children swimming are alert and supportive to the qualified Swimming Teacher.

### Teaching in the Water

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 (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.

In this way, it may be practicable to supervise up to 6 learners, 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 (Swim England Safe Supervision 2017 - see page 5 [6. Teaching Position] Safe Supervision in Pools).

### Swimming Clothing and Equipment

#### Teacher Clothing and Equipment

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

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

**Whistle Drill**
- **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 costumes for swimming that conform to safety, cultural and teaching requirements. Swimming hats must be worn and all jewellery removed. Where children may not be able to remove earrings, these must be taped.

It is important that swimming clothing is relatively tight fitting so as 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.

See **Appendix J** – (Improving Participation of Muslim Girls in Physical Education and School Sport, Shared Practical Guidance from Birmingham Schools, 2008; Chapters 2 & 3 Changing and Swimming Respectively).

And also **Appendix K** - (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 verrucae, as learning to swim is statutory in the National Curriculum and helps prevent death from drowning. Over the counter treatments e.g. Bazuka provide a layer of protection over the verrucae.

**Guidance on Goggles**

**Association for Physical Education and Swim England Guidance:**

While swimming goggles may make a child feel comfortable in the pool while they are learning to swim, if they accidentally end up in water it is unlikely they will be wearing them.

It is vital that children 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.

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 individual children’s needs remains critical in determining the wearing of goggles.

Parents are responsible for requesting permission that goggles be worn by their children 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 being undertaken. Children will be asked to remove their goggles for self-rescue and water-based games; e.g. water polo. For some swimmers where speed and competence increases, there may be a need for pupils to wear goggles. Club swimmers for example will benefit from the use of goggles due to the longer daily exposure to chlorine.

Wearing prescription goggles for pupils who are very short sighted, may result in a safer swimming environment.

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 goggles should be removed. Ill-fitting goggles may mist up or fill up with water, thus affecting visibility. School staff should not fit or adjust a student’s goggles.

Parents should be informed of their responsibility to teach their child to put on and take off goggles in the correct and safe fashion (slipping them off the head and not by stretching the retaining band). This should be included in the School’s Risk Assessment. An example letter can be found in Appendix G.

Choose a pair of goggles with British Standards Institution (BSI) instruction on the package for the correct way to put them on and take them off (BS 5883:1996).

Safeguarding

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

The school should assure themselves that the centre has carried out appropriate DBS checks and undertaken any other relevant safeguarding vetting checks and that any staff members working in “regulated activity” are not barred from working with children.” Each school should have a designated person with responsibility for Child Protection, the Designated Safeguarding Lead.
When supervising children changing or assisting them with their swimming, pool and school staff and adults other than teachers should avoid physical contact with children unless it is:

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

In these circumstances, the adult should explain the reason for the physical contact to the child. Unless the situation is an emergency the adult should ask the child for permission. If children have disabilities, they and their carers need to be involved in deciding what assistance should be offered and the child should be treated with dignity and respect. School Staff should also refer to their school code of conduct/staff behaviour policy or safe practise document.

‘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.

Appendix I contains the ASA Guidance for Teaching in the Water and The Handling of Children.

The protocols Swim England suggest include:

- Ensure there is a system included within the Pool’s NOP/EAP whereby the parent or guardian of the pupil gives permission for the teacher to handle the children for the purposes of supporting them in the water or manipulating limbs to convey correct stroke techniques (this could be through the parental swimming permission form),
- Ensure that any handling of pupils is done within clear sight of other persons,
- Always explain to the pupil that you are now going to hold him/her and why, to avoid embarrassment,
- Swimming Teachers must never support pupils in such a way that their hands cannot be seen by the spectators,
- Never support a pupil by handling the swimmer’s torso,
- Only support swimmers by holding their hands, head or feet.

Additionally, Teachers should NEVER teach or coach a swimmer alone.

Where children sustain an injury and any First Aid is administered the parents/carers should be informed as soon as possible. Details should be recorded and retained by the school. Accidents and incidents which occur should also be recorded by pool staff on their forms for their records and further reported to County via https://intranet.oxfordshire.gov.uk/cms/content/reporting-accident-online. Academies will have their own reporting procedures.

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

Staff and adults other than teachers should avoid placing themselves at risk by being alone with a child and should ensure that wherever possible there are other responsible persons around and that they are in public view.

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

**Supervision of Changing Rooms**

Parents/Guardians should be informed of changing arrangements.

It is the responsibility of the accompanying school staff to provide appropriate supervision whilst the children are changing. The school’s safeguarding policy comes into play here. Only staff of the appropriate gender should enter the changing room, where possible, unless in an emergency. A mixed gender group may use an open plan, single sex changing area if the children are under the age of seven and with agreement from pool management.

There should never be a situation where a member of staff is alone with a child. All of the children should remain together in a group. In situations where this is not possible, two members of staff should remain together. Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise children and that children are safeguarded from members of the public.

Discuss solutions with your Leisure Provider. 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.

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

NSPCC have produced a Factsheet for Schools ‘Getting Changed for PE’ March 2018.

**Conditions of Hire to Outside Organisations**

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

Equally if a school hires a pool from someone else that organisation will need to make sure that the school is supported in the safe use of the pool, including safeguarding of young people and vulnerable adults.

The mechanism for this is initially the agreement to hire and any conditions of hire imposed by the organisation. Hire conditions will be based on provisions made in the NOP and EAP for the pool.
The agreement to hire should be reviewed at regular intervals - whenever dates and times are confirmed, these should be recorded in a signed agreement between the two parties. The hirers should also be given an up to date copy of the relevant NOP and EAP for the facility and any special conditions of hire which might apply to their session. A qualified RLSS NRASTC or NPLQ Lifeguard must be present regardless of pool depth.

**Conditions of hire should include:**

- The name and address of the organisation hiring the pool,
- The name and address of the pool being hired,
- The name of the hirer’s representative (the responsible person - first point of contact) and contact details,
- The activity for which the pool is to be hired (to assess the level of risk and safety rules required by session type),
- The numbers participating and their age and swimming ability (where a school hires a pool for a block involving more than one class with different abilities the form should be ideally completed to show all this information as the teacher ratios/equipment/area of the pool used may need to be different for different groups),
- Specific agreement on the respective responsibilities of the hirer and the pool operator (for instance, number of swimming Teachers and their qualifications; who will provide the lifeguarding; qualifications of lifeguards and the level of lifeguarding provision to be made, qualifications of First Aiders, child protection issues, staffing levels),
- Details of who is to be responsible for what in the event of an emergency (normally it is the operator of the pool who is responsible for building related problems and the hirer for emergencies associated with the activities of the group); responsibility for emergency equipment at poolside, e.g. poolside First aid, rescue equipment; responsibility for structural or power failures etc. will remain with the pool operator who will therefore need to have competent staff in attendance during the hire session,
- Any safety advice to be given to swimmers and any specific rules that should be enforced,
- A signature from the hirer that they have received read and understood the copies of the NOP & EAP,
- A protocol for Child Protection Procedures. All persons working with children shall have an up to date DBS and this needs to be shown with the hire agreement,
- Appropriate third-party liability insurance to the value of 10 million public liability insurance,
- Ratios for un-programmed sessions should be different to structured swimming lessons. A qualified NPQL Lifeguard must be present regardless of pool depth. The pools NOP shall be referred to as un-programmed sessions are often prohibited due to their unpredictable nature. In addition, young children require close supervision in the water by an adult,
- 4 years and under in a ratio of 1:1,
- 8 years and under in a ratio no more than 2:1.
Where schools do not hire pools but use them on a pay for pupil per head basis, schools are recommended to put in place a reverse procedure confirming their use to the pool in writing and asking the pool for details of the NOP and EAP, conditions of hire and respective responsibilities.

**Safety Equipment**

Safety equipment such as poles, throwing 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.

Reaching poles should be kept at both ends of the pool and should be long enough to reach over half of the width of the pool, location being clearly indicated. (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.

- 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 non-swimmers are present,
- Consideration needs to be given to 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.

N.B. All pools should be able to be locked off 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* (Institute for the Management of Sport and Physical Activity IMSPA) - this requires refreshing every 3 years.

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

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

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

**Pool Plant Operation**

**For school pools**

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

**Pool plant operators**

Pool plant operators must attend the PALM Academy Small Pool Operators Certificate (formally Pool Carers Training) with refresher training required on a three year basis (or equivalent qualification that meets the PWTAG training syllabus); a two day course covering what the plant operator needs to now 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.

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

**In Public pools/Non School pools**


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

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.

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

Schools may contact SMS Environmental Water Safety Experts or Carlton Associates Ltd to inspect school seasonal pools termly, prior to opening, and hydrotherapy/non-seasonal pools termly (these adhere to NHS/PHE guidelines). Aspects for compliance include training and competence, written safe operating procedures, Risk Assessments, including Cryptosporidium, site safety, signage, chemical safety, flow meter and water testing regime. Where fully compliant with OCC requirements, the establishment/setting will be given a written Report confirming that the pool can be used. This may include recommendations for action. An unsatisfactory Report may require a second visit to verify improvements before the pool can be used.

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

Microbiological testing is carried out at the following frequencies:

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

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/facsimile/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, to obtain satisfactory results before the pool can be put back into use. The Health & Safety Team (see contacts) must be informed of the results.

Records

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

Routine Maintenance

Daily running of the pool and related plant will be the responsibility of the Pool Operators. Support is available to the Pool Operators from Carlton Associates and the OCC 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 bather's feet. Where there are cracked paving slabs, these should be replaced immediately.

**Records – Swimming**

**Qualifications**
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 School 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 (Appendix F School Swimming Checklist).

**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**

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.

**Young people must be supervised by a competent QUALIFIED adult at all times whilst undertaking swimming activities.**

**Swimming Pool (Lifeguarded) -**

LA approval is **not** required.
UK Swimming Pool operators have a duty to take all reasonable and practicable measures to ensure that teaching and coaching activities are conducted safely. It is essential that pools are not used where there is a risk of entrapment or vacuum.

Visiting School Staff must be aware of all pool procedures, both normal and emergency (request pool’s relevant safety procedures – see School Swimming Checklist, Appendix F which explains roles in an emergency; meeting points etc./relevant aspects from NOP, EAP and Risk Assessments at least one month before your visit) and who at the venue will provide back up.

The establishment must be able to provide its own qualified lifeguard, who must meet the employer requirements for qualifications. Arrangements should be made to ensure sole use of the pool if possible.

If other guests increase the number of bathers in the water, it should be established that this remains within ratios agreed. Sufficient supervisory staff must be on poolside to ensure effective supervision of the whole pool.
Supervision should be proactive. Teachers must work with the lifeguard to supervise the session, actively working together as part of a team safeguarding all the children. This will help ensure that behaviour is appropriate. In a similar manner, significant medical and additional needs should be made known to the pool management and lifeguards.

The pool lifeguard should deal with all emergencies occurring in the water.

Where the lifeguarding duty is given to an appropriately qualified young person, they should have an induction to the pool, which will include aspects from the NOP/EAP, so they are able to use their qualification effectively. The Visit Leader will still retain overall supervision responsibilities to guarantee appropriate levels of behaviour.

Lifeguarding must be the sole activity of the person given that responsibility – they should not combine recreational activities with lifeguarding (i.e. they should remain on poolside, being vigilant at all times).

For lifeguarded public pools abroad there must be appropriate lifeguard cover in place prior to participants entering the water.

Unless suitably qualified, the school staff should not have responsibility for lifeguarding. However, they do retain a duty of care for participants at all times.

For swimming lessons, the visit organiser will verify with the pool, prior to arrival that the Specialist Swimming Teacher or other pool employees/responsible adults supervising the participants, are qualified according to current guidelines. The Hire agreement should document this information.

Where swimming takes place as a recreational activity, as part of an educational visit, consider how best to structure the activity to ensure good behaviour and safe practice.

**Hotel (and other) swimming pools**

Establishments must check the lifeguarding position in advance.

OCC approval is not required for this activity if qualified lifeguarding is provided at the pool.

If lifeguarding arrangements are not provided at the pool, then the Visit Leader **MUST seek advice from the OCC Off Sites Visits Officer** (See further information and advice, page 53).
The following national awards/lifeguarding qualifications apply:

For free swimming activity:

- A valid [RLSS UK National Pool Lifeguard Qualification](https://www.rlssuk.org/lifeeguard-training/national-pool-lifeguard-qualification) (NPLQ), or equivalent in the country visited - see Royal Life Saving Society

For structured or programmed activity:

- A valid RLSS UK National Pool Lifeguard Qualification (NPLQ), or equivalent in the country visited – see Royal Life Saving Society OR
- A valid RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC) or equivalent - see [National Rescue Award for Swimming Teachers Coaches](https://www.rlssuk.org/training/national-rescue-award-swimming-teachers-coaches) (providing the pool Risk Assessment allows this qualification);

The role of the Lifeguard is to:

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

**Natural Water Bathing/Open Water Swimming**

Guidance must be sought from OCC Off Sites Visits Officer

Natural Water Bathing/Open Water Swimming is defined as “swimming or paddling, in river, canal, sea or lake”.

The following document must be read in conjunction with the below [Group Safety At Water Margins CCPR](https://www.gov.uk/government/publications/group-safety-at-water-margins-ccpr).

The RLSS National Water Safety Programme (NWSMP) assists organisations to meet their civil and statutory safety management requirements.

Taking children and young people on a visit to the seaside in good weather, and then not allowing them to at least paddle or cool off in the water would seem risk-averse.

Involving children and young people in well organised and supervised swimming or paddling in natural waters can provide a great opportunity to develop their awareness of Water Safety, choice of swimming area and safe conduct while swimming. This is important because swimming and paddling in natural waters present real risks: around 400 people drown every year. The most effective way to reduce the risk of children and young people drowning is to teach them to swim, giving them the skills to make sound judgements about playing in and around natural waters.
Open inland water such as rivers, lakes, reservoirs or canals present additional risks to those of a swimming pool. These include vegetation and other underwater obstructions, sudden changes in depth, pollution, slippery rocks and surfaces. Additionally, swimming in the sea carries risks which may include low water temperature, strong winds, undertow and tide.

Natural water bathing should always be a planned activity, not an impromptu group activity (e.g. because it is hot weather). Visit Leaders must use bathing areas that have qualified lifeguard cover. They should be aware that young people might mingle with members of the public and be lost to view. In natural water bathing, young people should always be in sight and within reasonable reach of those supervising them. It is essential that supervisors always know how many young people are in the water and where they are.

The Visit Leader should communicate to all supervisors and participants the arrangements for supervision. It is advisable, if going to a lifeguarded beach, to notify the lifeguards in advance as they may be able to provide extra cover for the group.

**Paddling in the sea (gentle, shallow water with no intention to swim)**

The intention to paddle in the sea must be clearly identified as a significant issue in the Risk Benefit Assessment and include:

- A minimum of 2 staff and a ratio of 8:1 participants to staff,
- The ability to account for all participants at all times,
- A person qualified in at least Emergency First Aid and competent to carry out CPR. This person may be included in the staffing ratio or be present as an additional person to carry out this responsibility. A person qualified in Level 1 and 2 RLSS NWSMP will be able to meet this expectation (see info on page 54),
- Thorough knowledge of conditions on the beach,
- An agreed and restricted paddling area taking into account: age, weather and water conditions and safety provision,
- Emergency signals - visual and audible – and the need for a whistle and First Aid equipment,
- Mobile phone to contact emergency services if required.

**For free swimming activity - Qualifications Required:**

- A valid National Vocation Beach Lifeguard Qualification (NVBLQ) or equivalent in the country visited, see www.lifesavers.org.uk NB this is for beach/sea only, not inland water,
- RLSS UK National Water Safety Management Programme (NWSMP), Level 3, with appropriate endorsement Royal Life Saving Society

**For structured or programmed activity - Qualifications Required:**

- A valid RLSS UK National Vocation Beach Lifeguard qualification or equivalent – see Royal Life Saving Society,
- RLSS UK National Water Safety Management Programme (NWSMP) Level 3, with appropriate endorsement see Royal Life Saving Society.

When close to or entering a fast-flowing stream or river, a qualified Activity Instructor will require experience and skills in white-Water Safety and lifesaving.
Managing Natural Water Bathing/Open Water Swimming

Everyone should know:

- That many people who drown are strong swimmers,
- That sudden immersion in cold water can be very dangerous.

Other Activities

Jumping and diving, as from sea cliffs or gorge environments, should be treated as a specialist adventure activity and managed accordingly. The activity leader should be assessed as specifically qualified and competent to lead these activities.

Leaders must:

- Clearly identify the activity in the Risk Benefit Assessment,
- Ensure parents are fully involved,
- Undertake a thorough Risk Assessment with organisations who have a thorough knowledge of the venue. The Risk Assessment needs to be continually reviewed,
- Know the level of the participants’ swimming confidence, competence and proficiency,
- Ensure the activity is suitable for the group, especially any with additional needs or disabilities,
- At a beach look out for warning signs and flags: a red flag means it is unsafe to swim; red and yellow flags mean that lifeguards are on patrol in the area between the flags; a black and white flag means it is an area used by surfers and not suitable for swimming – ensure qualified lifeguard cover,
- Ensure a professional judgement has been made on the quality of the water,
- Brief the group about the limits of the bathing area (this should include temperature, depth, visible boundaries),
- Consider marking the bathing area, for example with a rope or buoys,
- Adopt and explain signals of distress and recall,
- Have clear roles within the supervision plan – at least 2 supervisors should always stay out of the water for better surveillance, even though lifeguards are on duty,
- Carry out regular and frequent head counts,
- Take up a best position from which to exercise a constant vigilance,
- Divide supervision between staff who are in the water and looking landward towards the group, and staff who stay on land and watch the group from that vantage point,
- Give the participants their full, undivided attention,
- Be prepared to act immediately when a participant appears to be in difficulties,
- Be aware that a participant in difficulty may not wave or shout – all of their energies could be focussed on trying to keep afloat,
- Follow the advice or directions of an official lifeguard,
- Avoid swimming themselves - unless it is to help a person in distress,
- Avoid joining in with the group’s water-based games,
- Ensure that participants leave the water if they are at risk of becoming too cold; especially if toes and fingers look blue or feel numb (this could suggest the onset of hypothermia),
- Advise participants to wear appropriate footwear,
- Recommend the wearing of wetsuits to reduce any risk of hypothermia.
The RLSS National Water Safety Management Programme (NWSMP)

The NWSMP (RLSS UK Certificated Award) fulfils the Water Safety training needs of schools on educational needs reflecting the range of activities that take place in and around the water's edge. Starting with Level 1 Water Safety Awareness Module, candidates can progress to a range of environmental specific modules which cover hazards associated with stillwater, river and beach environments as well as basic rescue techniques for anyone requiring more advanced rescue skills. The in-water rescue module covers essential in-water rescue knowledge and tests competency. The life support element can be added to make a truly comprehensive programme.

School staff are encouraged to develop their skills and competence through undertaking appropriate training in the relevant modules. (NWSMP - Royal Life Saving Society)

Level 1: Water Safety Awareness Module
For those working or supervising near water, who do not have a definite intention to get into the water; e.g. a school teacher on a field trip.

Level 2: Environment Specific Modules (River, Still Water and Beach)
For those who have a greater likelihood of getting closer to or in the water, but with a definite intention to stay within standing depth.

Level 3: In Water Rescue Module
For those with people under their supervision who might be swimming out of their depth, e.g. Outdoor Pursuit Instructor leading a deep-water activity session.
References

1. Swim England Safe Supervision of Programmed Swimming Sessions 2017
2. Swim England Safe Supervision for Teaching and Coaching Swimming - definition of supervision
4. (The Association for Physical Education and Coachwise Ltd), Safe Practice in Physical Education and Sport. 9th ed. 2016: Association for Physical Education (); ISBN: 978-1-909012-35-6; Aquatic Activities – Chapter 4
5. (AfPE’s Health and Safety Project Manager), Safe Practice in Physical Education and Sport. 9th ed. 2016: Association for Physical Education (); ISBN: 978-1-909012-35-6(Appendices on accompanying CD); Aquatic Activities – 5.2
6. All schools with their own pools should have a copy of HSG 179 ‘Managing Health and Safety in Swimming Pools’ 3rd Edition, 2003, which they can purchase from the Health and Safety Executive (HSE), or also available to download free from: www.hse.gov.uk
7. The School Swimming Charter
8. Swimming Teachers Association Email - sta@sta.co.uk
9. Institute Of Swimming
10. Royal Life Saving Society Email - lifesavers@rlss.org.uk
11. Association for Physical Education Email - enquiries@afpe.org.uk
12. Improving Participation of Muslim Girls in Physical Education and School Sport, Shared Practice Guidance from Birmingham Schools, 2008
13. Oxfordshire ‘Safe Practice in School Swimming’ Policy June 2018
Other Useful Websites/Documents:

1. Chartered Institute for The Management of Sport and Physical Activity (CIMSPA)
2. Maritime and Coastguard Agency (MCA)
3. Royal Life Saving Society Tel. 01789 773994
4. Government Safety Advice on Watersports and Coastal Activities
5. The Royal Society for the Prevention of Accidents (ROSPA) Email - help@rospa.com
6. British Swimming Coaches Association (BSCA) Email - info@gbswimcoaches.co.uk
7. Swimming.org
8. HSE Managing Health and Safety in Swimming Pools
9. Sport England Affordable Swimming Pools
10. Scottish Swimming
11. Swim Ireland
12. Swim Wales
For further information and advice:

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# Appendices

Appendices marked *(1)* relate particularly to Part 1: Bucks Safe Practice in School Swimming Policy

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

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