

Private Pool Safety

Private Pool Safety –Raising awareness of the risk of accident and injuries in private swimming pools.

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Chapter 1

Introduction – aims and objectives of the Initiative

Health Challenge Wales

1. The key themes of Health Challenge Wales have been selected because they are considered to be those issues that constitute a significant proportion of the ill health that could be avoided. Reducing accidents and injuries is one of the key themes. This initiative is designed to raise awareness of and reduce the number of recreational water (privately operated swimming pools) related injuries and deaths through a targeted enforcement and education programme.
2. There are a range of accidents that can occur in a swimming pool environment, ranging from a simple slip to death. Drowning accidents particularly affect young children and just a few minutes under water can prove fatal. Many people who are pulled from the water alive, develop severe brain damage due to lack of oxygen, and serious injuries can occur when individuals dive or jump into shallow water or slip on the hard surface around a swimming pool. Figures released for 2002ⁱ indicate that 15 (4%) of deaths by drowning in the UK took place in swimming pools. There is no break down of these figures into public operated, privately operated and domestic pools.
- 3.

Drownings in the UK 2002 by location

Coastal	87	20%
Lakes and Reservoirs	50	12%
Home Baths	42	9.8%
Canals	34	8%
Docks and Harbours	18	4%
Swimming Pools	15	4%
Garden Ponds	13	3%
Other	1	0.2%
Total	427	

4. There are no national figures collated for accidents and injuries occurring in swimming pools. Where the incident gives rise to a notifiable accident the accident or injury is notified to the relevant local authority which will carry out an investigation. Where the accident or injury is not a notifiable accident it may be recorded in the accident book maintained at the premises. This accident book may be inspected by the local authority office inspecting the premises.
5. Given the absence of national figures relating to accidents and injuries sustained by users of swimming pool it is impossible to calculate the cost of the same. Costs are incurred by the NHS in providing treatment, where required. These costs can be considerable where there are incidents of brain damage or paraplegia, and the costs in personal terms to the affected individual and that person's family are large and long lasting. Brain injuries can be life limiting. Costs are further incurred through loss of productivity where absences from work result from the injury sustained.

6. This intervention is designed to raise awareness of the risks of accidents in privately operated swimming pools. These pools are subject to local authority enforcement under the Health and Safety at Work etc. Act 1974 and would therefore be part of enforcement programme, the timing of which would be determined by risk assessment. In raising awareness of the risk of accidents and injuries it assists in preventing the same occurring. It is therefore an intervention which addresses one of the key themes of Health Challenge Wales.

ⁱ ROSPA

Chapter 2

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1. Initial considerations

Initial considerations for this project have to be addressed, including;

What is the target group?

Will the outcome have the desired outcome?

How can the target group be reached?

Who are the key partners in the initiative?

How will the initiative be evaluated?

Will the initiative deliver value for money?

2. Target Group

There are two target groups for this initiative, being operators of private swimming pools as the first, and users of the pool as the second group.

Private swimming pools have been selected for this initiative since they are inspected by local authorities under the Health and Safety at Work etc Act 1974 as part of the inspection regime, and their locations are known to the local authority. Local authority pools are not included since these are not inspected by the local authority, and domestic swimming pools are not included as there is no general public access to them.

The first target group, private pool operators are easy to identify. Local authority databases can be interrogated and the location and names of operators determined.

The second target group is more fluid. Users of private pools can be a fixed group, such as members of a private leisure club or may be random, guests at a hotel or visitors to a holiday park. This group will be more difficult to reach because its membership will change on a daily basis and there is unlikely to be a meaningful interface between the partners to this initiative and the group members.

3. Achieving the desired outcome

The desired outcome for this initiative is to raise awareness with both of the target groups of the risks of accidents and injuries occurring in and around private swimming pools, and to thereby reduce the incidents of the same. It is anticipated that raising awareness with the swimming pool operators will cause them to ensure that all steps that can reasonably be taken to prevent accidents and injuries occurring are taken, to make the pool environment as safe as it can be, and that raising awareness with the users of the pool will reduce risk taking in and around the pool.

4. Reaching the Target Group

The first target group, pool operators can be identified by interrogation of the local authority database. It is suggested that they are reached through a targeted inspection programme, of which they have prior warning. The inspections constituting the programme would satisfy the requirements of the Health and Safety at Work etc

Act 1974, but would place additional emphasis on the pool and its immediate area, and the practices and procedures employed there. The pool operators would also be supplied with information about pool safety for incorporation into their Risk Assessments Normal Operating Plan (NOP) and Emergency Action Plan (EAP)

The second target group are reached through provision of advice in the form of leaflets and posters on safe conduct around swimming pools. Posters can be displayed in changing rooms, around the pool sides and communal areas of holiday parks and caravan sites, and the leaflets can be left for self selection in leisure clubs and hotels, as well as provided with literature in arrival at holiday parks and left in caravans and accommodation.

5. Who are the key partners in the initiative?

As this is an initiative based around enforcement there are few partners. It is suggested that the Environmental Health Department would lead, with support where required for the Community Safety Forum. Voluntary bodies such as ROSPA may be interested in the initiative, but clearly care must be taken not to overload an enforcement based initiative with partners. It is suggested that the local authority Public Relations department and local media should be partners to the event raising the profile of the issue of swimming pool safety and promoting the safety advice at the centre of the campaign.

6. How will the initiative be evaluated?

There are a number of strands to the evaluation of this project.

The first evaluation tool is to consider what changes, if any, are made to the manner in which private pool operators conduct their business as a result of the initiative. Changes in behaviour can be assessed by comparing findings from the first visit to the premises to findings at the revisit (if enforcement notices are served) and the final visit, at the end of the programme. Changes in procedures may be noted, as may amendments to Risk Assessments or Operational Plans designed to reduce the risk of accidents occurring. These would suggest that the intervention has had a positive effect.

The second evaluation strand is consideration of the number of accidents that have occurred at the premises related to the pool or its immediate environment prior to the intervention and after it. These figures can be taken from RIDDOR notifications to the local authority and from entries in the Accident Book relating to non-notifiable accidents. A reduction in notifiable and non-notifiable accidents would suggest that the intervention has had a positive effect. It should be noted that numbers of reported accidents may be small both before and after the intervention, but that this does not detract from the value of the intervention. Major injuries to or the death of a swimmer can occur from one act or omission on the part of the operator of the pool or the swimmer themselves, and it is these incidents that the intervention seeks to address, as well as the more minor accidents that do not have such a debilitating effect.

7. Will the initiative deliver value for money?

This intervention combines a free standing Health Challenge Wales Initiative and an enforcement initiative under the Health and Safety at Work etc Act 1974. Other than the costs of producing and disseminating leaflets all other costs associated with the initiative are costs which form part of the environmental health department enforcement budget. In the pilot project 500 leaflets were produced, at a cost of £140. Given the very small cost of carrying out the initiative and the benefits that can flow from it, it is suggested that this initiative is good value for money.

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Chapter 3

Private Pool Safety –Raising awareness of the risk of accident and injuries in private swimming pools.

The Campaign

A campaign, allied to a programme of enforcement visits, to raise awareness of the risks of accidents and injuries occurring in and immediately around privately operated swimming pools with both the operators of the pools and the pool users.

Preparation for the initiative.

1. Prior to the commencement of the initiative the local authority should prepare the advice that it intends to provide to the target groups. Two different types of advice will be needed, one targeted at the users of the pools and one targeted at the operators. The advice leaflets used by the pilot authority, the Vale of Glamorgan Council, are shown as [Appendix 1](#) and [Appendix 2](#), for users and operators respectively. It is suggested that both of these advice leaflets should be placed on the local authority website to give them maximum exposure.
2. The environmental health department should interrogate its RIDDOR Accident reports and highlight any notifiable accidents that have taken place at any of the private swimming pools in its administrative area in a fixed period. The same period should be used to identify accidents that have occurred in or around private pools and which are recorded in the Accident Book of all of the targeted premises to give a clear picture of the level of risk that is being addressed by the intervention.
3. Whilst this is an enforcement initiative there is no intention to criminalise private pool operators. It is therefore suggested that prior to the commencement of the initiative a letter should be sent to all operators, advising on the impending initiative and further advising them of their responsibilities and where information may be obtained. A suggested draft of the letter, as used in the pilot project appears as [Appendix 3](#). In order to ensure consistency in the carrying out of the inspections of the premises it is suggested that an Inspection Form, to be used when inspecting all of the private pools. The inspection form used in the pilot project appears as [Appendix 4](#).
4. Prior to the commencement of the initiative it is necessary to ensure that a sufficient supply of public information leaflets are in place. It is suggested that the leaflets should be provided for self selection in
 - changing rooms of hotel pools and leisure clubs,
 - public areas of holiday parks and camp sites
 - On the local authority web site
 - Libraries
 - Tourist Information Centresand to be included in
 - membership packs for leisure clubs,
 - welcome packs at holiday parks
 - information wallets in hotels

- Holiday caravans prior to take over by new occupants

Neither of these lists is exclusive nor exhaustive.

Running the Initiative

5. At a pre-determined date the local authority should commence the inspection and advice visits to the privately owned swimming pools in its area. The inspections should be carried out over a short period of time, to ensure that results are comparable on a premise with premise basis. Some of the visits will be out of synchronisation with the risk assessed priority rated inspections under the Health and Safety at Work Act regime, and adjustments should be made to the inspection programme to take account of this. During the inspection visit the level of knowledge of the pool operator and such staff as work around the pool should be assessed by the inspecting officer. The Risk Assessment, Normal Operating Plan and Emergency Action Plan should be reviewed and their adequacy in respect of accidents and injuries around the pool considered. The accident book should also be reviewed, and details of recorded accidents around the pool should be taken over the same time period as was used for RIDDOR reported accidents (see paragraph 2 above). Where necessary Enforcement Notices should be served.
6. Where Enforcement Notices were served as the result of the inspection visit, re-inspection should be carried out at the end of the compliance period in the normal manner.

Evaluation of the Initiative

7. At a pre-determined period after the initial inspection visit all of the swimming pools should be inspected again in order to evaluate the success or otherwise of the intervention. The inspecting officer should assess again the level of knowledge of the pool operator and the staff that work around the pool and make a subjective assessment as to whether this has improved. The officer should also take a view as to whether practises and procedures have improved. He or she should inspect the Accident Book to check whether there have been any accidents in and around the pool since the start of the initiative, and if there have, should seek to establish the cause of the accident, i.e. whether it was caused by an act or omission on the part of the pool operator or on the part of the pool user. All of this information can be used to assess whether or not the initiative has improved levels of risk awareness and behaviour within the pool operator target group.
8. It is harder to assess the impact of the initiative in the risk behaviour of the pool user target group. Consideration of accidents reported in the Accident Book and their causes may allow the authority to determine whether the pool users have changed their behaviour patterns such that they exhibit less risky behaviour, although this will only hold true where the behaviour manifests itself in an accident recorded in the accident book. The number of leaflets taken by self selection can also be used as an evaluation measure, making the assumption that those taking the leaflets will read themselves and their awareness of risk will be improved and that they may pass them to others who may also benefit from reading them.

Appendix 1

Swimming Pool Safety (Members of the Public)

When visiting a swimming pool you need to adopt a sensible attitude in and around the pool area and make sure children are supervised at all times. Find out about your swimming pool's safety rules. You could look out for useful posters or leaflets, or ask a pool attendant for information.

Ask your child to watch what the lifeguards do. Why do they blow their whistle and tell people off? What sorts of things are dangerous in the pool?

Here are some useful tips to ensure safety at all times when using the swimming pool.

- Check the depth of the water
- Always swim within your ability
- Avoid unruly behaviour which can be dangerous, be aware of the pool rules which are there for your safety and that of other users
- Always listen to the Lifeguard and remember, a moment of foolish behaviour could cost a life
- If you have a medical condition such as epilepsy, asthma diabetes or heart condition try to swim with a friend, if unaccompanied inform the Lifeguard on duty so that they are aware in the event of an emergency.
- Never swim after a heavy meal or under the influence of alcohol.
- Children under the age of eight must be accompanied in the swimming pool at all times by a responsible adult.
- If you see someone in difficulty, get help immediately.

This is not an exhaustive list but if you stick to these simple rules you should have a safe and enjoyable time at the swimming pool.

To access our service you can telephone us, write, fax or send an email.

Our opening hours are 8.30am 5.00pm Monday Thursday, and 8.30am 4.30pm Fridays.

Tel: 01446 709105

Fax: 01446 709449

E mail: RegServ@valeofglamorgan.gov.uk

Address: Civic Offices, Holton Road, Barry, Vale of Glamorgan, CF63 4RU.

Appendix 2

Important Safety Advice to Swimming Pool Operators

Swimming is an important skill and health exercise for many thousands of adults and children. Sadly about 10 people drown in pools every year. Any drowning is a tragedy. Worse still, most drownings could have been prevented by greater precautions by pool operators, greater care on the part of the bathers, or a combination of both. However swimming pools are far safer places to swim than open water, which claim far more lives than swimming pools.

A tragedy can occur at any time and operators must be vigorous not only in the application of precautions but in their maintenance.

Set out below is a brief check list for pool safety. Pools are high risk areas and you are required to take all reasonable precautions. For further advice, pool operators are strongly advised to obtain the Health and Safety Executive (HSE) publication HSG179 "Managing Health and Safety in Swimming Pools", available from HSE Books, PO Box 1999, Sudbury, Suffolk CO10 6FS, telephone 01787 881165, fax 01787 313995. ISBN 0 7176 2686 5, price £10.95.

PAPERWORK

You should have a safety policy for your business which is signed and dated.

You should have risk assessments some of which will relate to the swimming pool.

The risk assessments will lead you to formulating procedures and instructions for staff. They will also lead to the recognition for the need for training.

One specialist type of risk assessment will relate to the "control of substances hazardous to health" or COSHH. These must be carried out to show the precautions to be taken when using certain chemicals i.e. those used for pool dosing.

In addition to a policy and risk assessments you should have instruction procedures in the form of a written Pool Safety Operating Procedure (PSOP) which consists of Normal Operating Plan (NOP) and Emergency Action Plan (EAP) for the pool, changing facilities and associated plant and equipment.

Normal Operating Plan:-

- **Details of the pool(s)** - including dimensions, depths, features, equipment and plan of the building.
- **Potential risk factors** – an appreciation of the main hazards and of users particularly at risk is required before safe operating procedures can be identified
- **Dealing with the public** – arrangements for communicating safety messages to customers, customer care, poolside rules for the public and lifeguards, controlling access
- **Lifeguards' duties and responsibilities** – and special supervision requirements for equipment, etc; lifeguard training; and numbers of lifeguards for particular activities

- **Systems of work** – including lines of supervision, call-out procedures, work rotation and maximum poolside working times
- **Operational systems** – controlling access to a pool or pools intended to be out of use including the safe use of pool covers
- **Detailed work instructions**- including pool cleaning procedures, safe setting up and checking of equipment, diving procedures and setting up the pool for galas.
- **First Aid supplies and training**
- **Details of alarm systems, emergency equipment and maintenance** – all alarm systems and emergency equipment provided, including operation, location, action to be taken on hearing the alarm, testing arrangements and maintenance
- **Conditions of hire to outside organisations.**

Emergency Action Plan:-

Action to be taken in the event of a foreseeable emergency, for example:

- overcrowding
- disorderly behaviour (including violence to staff)
- lack of water clarity
- outbreak of fire (or sounding of the alarm to evacuate the building)
- bomb threat
- lighting failure
- structural failure
- emissions of toxic gases
- serious injury to bathers
- discovery of a casualty in the water

The procedure should make clear how to clear the water or evacuate the building, if it is necessary. Management should ensure that :

- all staff are adequately trained in such procedures
- notices are displayed to advise the general public of the arrangements
- exit doors, signs, fire fighting equipment and break glass call points where provided, should be regularly checked to ensure that they are kept free from obstruction
- all fire exit doors are operable without the aid of a key at all times the premises are occupied

Note: All these stages should be documented. If you are in any doubt on how to undertake any of these processes then please contact Environmental Health who advise.

Warning to the public

There are several ways to advise the public who use your pool.

There should be a sign indicating the general “do’s” and “don’ts” or pool rules. These may include:-

- encourage responsible behaviour i.e. no running, no bombing
- warn that the pool is unattended and there should be no lone bathing
- instruct that no children under fifteen years should be allowed if unattended

- instruct the entrance doors to be left secured and not let unattended children into the pool area
- no glass around the pool
- no large inflatables or floats
- no diving
- no swimming if intoxicated or after heavy meals
- information about the location of the emergency button

These signs should be placed in the changing room and be conspicuously displayed pool side.

Pool rules can also usefully be made into a leaflet which can be part of the room information pack or be handed out by reception.

The warnings about the pool being unattended and not allowing children under 15 to have access unattended should be repeated on the entrance doors.

In addition to the general text sign you should place “No Diving” signs in pictorial format to comply with the Health and Safety (Safety Signs and Signals) Regulations 1996.

Advice signs near the emergency button should indicate what to do and what to expect.

Instructions may also be given verbally by pool supervision staff or reception, (this should be as well as the precautions mentioned above not instead of them). Staff must feel confident and be trained to know they have the necessary authority to give instructions.

Pool side environment

The effective management of health and safety in any swimming pool starts with careful design. All of those involved in designing new pools or upgrading existing ones will need to give the highest priority to ensuring that they provide bathers and staff with a facility that is safe. Three requirements need to be met in order to achieve this:

the layout of the pool hall, and the pool tank (including its dimensions, profile and any water features) should be designed so as to make the safe use and supervision of the pool easy to achieve without complex or costly management arrangements;

the layout of the ancillary areas, including the changing, clothes storage, shower and toilet areas, should be similarly designed for safe use;

the structural elements, materials, finishes, and details which are used in the construction of these areas, including the pool enclosure, tank and equipment, and the way they are assembled should be those which are most appropriate to achieving a safe-to-use physical environment.

Further information can be found in the HSE publication ‘Managing Health and Safety in Swimming Pools’ mentioned previously.

Training

A variety of training requirements will flow from your analysis of your safety system, for example:-

- receptionists advice to guests and reaction to alarms
- duties of pool managers and supervisors
- first aid and resuscitation skills available when the pool is open
- pool plant operators should be trained to the Institute of Sport and Recreation Management (IRSM)

Further information can be found in the HSE publication 'Managing Health and Safety in Swimming Pools' mentioned previously.

Supervision arrangements to safeguard pool users

All pools require some measure of supervision but arrangements must be determined by risk assessment. The risk assessment undertaken at a swimming pool will need to include not only the physical hazards but those hazards relating to swimmers and swimming – related activities. When pool operators assess the need for supervision they will need to consider:

- local circumstances;
- the pool structure and equipment;
- the way the pool is used and the characteristics of those who may use it

Where can I get more information?

Further information can be found in the HSE publication 'Managing Health and Safety in Swimming Pools' mentioned previously.

You can also contact the Commercial Section of the Environmental Health department on:
Tel: 01446 709105
Fax: 01446 709449
Email: RegServ@valeofglamorgan.gov.uk

Appendix 3

Suggested text of letter to Pool Operators prior to commencement of Initiative

Swimming is an important skill and health exercise for many thousands of adults and children. Sadly about 10 people drown in pools every year. Any drowning is a tragedy. Worse still, most drowning could have been prevented by greater precautions by pool operators, greater care on the part of the bathers, or a combination of both. However swimming pools are far safer places to swim than open water, which claim far more lives than swimming pools.

A tragedy can occur at any time and operators must be vigorous not only in the application of precautions but in their maintenance.

The Environmental Health department of the Vale of Glamorgan Council intends to step up unannounced health and safety inspections of swimming pool establishments in 2005/2006, but pool operators cannot wait for an inspection before taking action. If individuals want advice then they may contact the Environmental Health department for advice; however, it is the responsibility of operators to ensure the safety of their establishments.

Pools are high risk areas and you are required to take all reasonable precautions. For further advice, pool operators are strongly advised to obtain the Health and Safety Executive (HSE) publication HSG179 "Managing Health and Safety in Swimming Pools", available from HSE Books, PO Box 1999, Sudbury, Suffolk CO10 6FS, telephone 01787 881165, fax 01787 313995. ISBN 0 7176 2686 5, price £10.95.

Appendix 4

SWIMMING POOL INSPECTION

Name:
Address:

Tel:
Inspecting officer:

Person Met:
Date:

STRUCTURE

Location of pool:

Type: (Indoor / Outdoor)

Length:

Width:

Depth (Deep end):

Depth (Shallow end):

Pool gradient:

Pool bottom outlets:
(size of grill aperture, velocity)

Method of preventing unauthorised access:
(height of fencing, self closing gate, mechanism for entry)

No. of bathers permitted:

POOL SURROUND

Slippery surface:

Cracked/loose tiles:

Contrasting edge:

FACILITIES

Access steps:

Diving:

Slide:

Showering facilities:

NOTICES

Depth (Deep end):

Conduct:

Security (Locked at night):

Use (Public / Private club):

Hired for parties:

Alcohol / Food permitted:

NOP / EAP:

SKETCH