





# School Swimming Policy

This policy was agreed by Trustees	
DATE APPROVED	17 <sup>th</sup> May 2023
REVIEW DATE	June 2024
CHAIR OF TRUSTEES SIGNATURE	
CEO SIGNATURE	

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

The policy is for all Eynsham Partnership Academy Schools.

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

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.

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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.

## **Responsibilities**

### **School Responsibility**

The Governing Body holds the responsibility for ensuring safety in swimming in each school. 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 Primary 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 in the school).
- Ensuring staff accompanying pupils to School Swimming have read, understood and signed 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 the EPA 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.
- Keeping current copies of the “Conditions of Hire” and Leisure Provider Insurance details within 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 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.
- Consideration will be made to ensure that schools are compliant with GDPR and the Data Protection Act 2018 so that schools efficiently develop the culture, processes and documentation required to be compliant with the strengthened legislation and effectively manage the risks associated with data management.
- See Appendix I for a Governor’s Checklist.

### **Teacher in charge of School Swimming and Water Safety**

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- Maintain the School Swimming Folder (see School Responsibility section above).
- Undertake 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.

**Accompanying School Staff (including teachers and other 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 organized 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 suitable dressed for their role.
- Ensure children are appropriately supervised when changing.
- Ensure children are under control at all times.
- 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).
- 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.

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.

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

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- Cannot swim
- Are reticent about being on poolside.

## Normal Operating Procedure

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 that they understand the Normal Operating Procedure (NOP) for the pool being used for School Swimming, to ensure that they are clear on their role and responsibilities during normal operations to maintain safety.

### For School Pools

Schools with their own pools will need to draw up the NOP for their own 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.

All school classes should run emergency practice drills to evacuate the water and summon assistance during the first lesson of each term/season (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.

## Emergency Action Plan

### Using a Leisure Provider Pool

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 and 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.

### Using School Pool

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.

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All school classes should run emergency practice drills to evacuate the water and summon assistance during the first lesson of each term/season (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.

**Exit doors and signs**, fire-fighting equipment and alarm points need to be checked regularly to ensure that they are working and accessible (in line with the EPA Health and Safety policy).

**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 initialed 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 which can be summoned quickly. If the pool has no alarm, there should be a phone on poolside which is checked before each lesson. **Access to emergency services must be guaranteed at all times the pool is in use.**

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

- Conform to British Standards.
- 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 minimize 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 design an 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.

NOPs Normal Operating Procedure	EAP Emergency Action Plan
<p>These are the day-to-day organisational systems based on Risk Assessment, and would typically include information relating to:</p> <ul style="list-style-type: none"> <li>• Pool design and depth</li> <li>• Potential areas of risk</li> <li>• Arrangements for lessons</li> <li>• Responsibility for safety</li> <li>• Staffing levels and qualifications</li> <li>• Supervision and student conduct</li> <li>• Arrangements for students with particular needs (e.g. very young children, or those with SEND or medical conditions)</li> <li>• Pool's safety equipment</li> <li>• Clothing and personal equipment</li> </ul>	<p>This should establish who assumes leadership in managing emergencies and the action to be taken in relation to such issues as:</p> <ul style="list-style-type: none"> <li>• Serious injury to the bather</li> <li>• Dealing with casualties in the water</li> <li>• Sudden overcrowding in a public pool</li> <li>• Sudden lack of water clarity</li> <li>• Disorderly behaviour</li> <li>• Vomit</li> <li>• Blood contamination</li> <li>• Emergency action due to:               <ul style="list-style-type: none"> <li>- Fire alarm</li> <li>- Bomb threat</li> <li>- Power failure</li> </ul> </li> </ul>

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<ul style="list-style-type: none"> <li>• Maximum numbers</li> <li>• First aid provision</li> <li>• Water quality</li> </ul>	<ul style="list-style-type: none"> <li>- Structural failure</li> <li>- Toxic-gas emission</li> </ul>
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**Guidance on Pool Temperatures can be found via the following link:**

<https://www.pwtag.org.uk/faqs/index.php>

## Risk Assessment

Risk Assessments must be carried out for all swimming activities. If you have your own pool the Risk Assessment must include the following:

- Pool design (including security)
- Depth of the pool
- Water Quality
- Pool organisation
- Staffing
- Pupils and ability (including medical needs)
- Supervision of changing rooms
- The use of goggles
- Staff clothing and equipment
- Pupil's swimwear
- Factors if staff in pool

**All pools should be able to be locked off and isolated to prevent unauthorized access.**

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

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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). 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.

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## Own School Pool

It is recommended that staff also undertake the Swim England Teacher of School Swimming and Water Safety course (formerly ASA NCTP Aquatic Skills of Schools 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.

## Teaching Qualifications Required for School Staff

EPA Requirements	Detail/qualification	
At least one of the staff accompanying students to a School Swimming at a Leisure Provider Pool (with a Main Pool Teacher Level 2 ASA Certificate - provided by pool)	Support Teacher of School Swimming & Water Safety. (Formerly ASA NCTP Fundamentals of School Swimming)	
	<b>Lifeguards</b> (will be provided by Leisure Provider): National Pool Lifeguard Qualification (NPLQ) or STA certificate – NARS Pool Lifeguard.	
All staff supporting School Swimming at their own pool shallower than 1.2m (Programmed sessions) – including hire to outside organisations.	Support Teacher of School Swimming & Water Safety.(Formerly ASA NCTP Fundamentals of School Swimming)	Minimum requirement
	Swim England Teacher of School Swimming and Water Safety. (Formerly ASA NCTP Aquatic Skills of School Swimming)	Highly Recommended
	<b>Lifeguards:</b> RLSS National Rescue Award for Swimming Teachers and Coaches (NRASTC) or STA Certificate – NaRS Pool Lifeguard	
<b>Unprogrammed school sessions are prohibited due to their unpredictable nature.</b>		

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## Teacher to Pupil Ratios

Ability/Age/Activity	Ratios
<b>Non-swimmers and beginners – young children</b> , normally primary school age, being introduced to swimming who are <b>unable to swim 10 metres unaided on back or front.</b>	8:1
<b>Children under age of seven</b> – irrespective of their swimming ability, group size should be restricted.	8:1
<b>Improving swimmers</b> – Swimmers of a similar ability to each other who <b>can swim at least 10 metres competently and unaided on their back and on their front.</b> It is recommended that the lesson <b>be confined to an area in which the children are not out of their depth.</b>	12:1
<b>Mixed ability groups</b> – pupils with a range of abilities (from improving to competent) where the <b>least able and least confident are working well within their depth.</b> Swimmers techniques, stamina and deep-water experience should be considered. <b>They should not include beginners.</b>	12:1
<b>Competent swimmers</b> – those swimmers who can swim <b>at least 25 metres competently and unaided on front and back, and can tread water for two minutes.</b>	15:1
<b>Swimmers with disabilities</b> – <b>each situation must be considered individually</b> , 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 <b>1:1 ratio for those needing constant support</b> , and a sufficient number of other helpers to provide the degree of support required by the range of disabilities within the group.	6:1 with 1:1 support in the water where required.

## Diving

Diving can 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.

## Teaching Self-Rescue and Water Safety

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.

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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. 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 present in the water.

## **Pupils' Swimwear**

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 e.g. lycra costumes/shorts.

Please also refer to document "Meeting the Needs of Muslim Pupils in State Schools, pages 31 & 38: <http://www.religionlaw.co.uk/MCBschoolsreport07.pdf>.

### **Goggles**

Parents are responsible for requesting permission that goggles be worn by their children and schools are responsible for collecting and recording such requests. School staff should not fit or adjust a student's goggles.

## **Safeguarding**

The Leisure Pool Provider will have their own Child Protection Procedures. It is important that the pool procedures relate to those of Eynsham Partnership Academy. 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, by checking that the contract with the Leisure Pool Provider, has carried out appropriate DBS checks and undertaken any other relevant

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safeguarding vetting checks and that any staff members working in “regulated activity” are not barred from working with children.

## 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.

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.

## 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 three years.

It is strongly advised that there are 2 persons qualified to run the pool so there is back up 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 with operating the pool and should be authorised to control the use of the pool.

## Pool Plant Operation

### For School Pools

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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 obtain the Physical Activity Leisure Management(P.A.L.M) Academy Small Pool Operators Certificate (formally Pool Carers Training), with refresher training required on a three year basis (or equivalent qualification that meets the Pool Water Treatment Advisory Group (PWTAG) training syllabus). This is a two day course covering what the plant operator needs to know to keep the pool water reasonably free from the risk of infection spreading, to keep the water clear so that pool users can be seen under the water and to operate a simple small 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.

## **Monitoring**

Eynsham Partnership Academy use SMS Environmental Water Safety Experts or Carlton Associates Ltd to inspect school seasonal pools prior to opening. 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 requirements, the school 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.

Microbiological testing is carried out, by a competent contractor, every month during the operating season, with the first being taken prior to opening.

### **Pool Closures**

If, following the issue of any Pool Service Report, the school is advised to close the pool based on unsatisfactory water chemistry, the report must be signed on behalf of the school by the Headteacher acknowledging the need for closure.

The bacterial samples have to be sent away for analysis; the school will be informed immediately of unsatisfactory results by phone or email and of satisfactory results by post.

Following closure for any reason it will be the school'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 EPA Facilities Manager must be informed of the results.

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## **Records**

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

## **Routine Maintenance**

Pool Operators should ensure that all safety fittings, such as pool steps, handrails 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 the pool 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.

## **References**

Oxfordshire "Safe Practice in School Swimming" Policy June 2018

Swim England Guidelines for School Swimming

All schools with a pool should download the free Managing Health & Safety in Swimming Pools 4<sup>th</sup> edition: <http://www.hse.gov.uk/pubns/priced/hsg179.pdf>

Meeting the Needs of Muslim pupils in state schools.

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# School swimming Governors' checklist

Please complete the Governor checklist below. Support and guidance for all key documents referred to in this survey, can be found in the Policy Document.

School Name:	
Please specify which pool you use for School Swimming:	
<p>The following people have read and understood the current EPA Swimming Policy. <i>Tick all that apply</i></p> <p><input type="checkbox"/> Lead Governor for School Swimming</p> <p><input type="checkbox"/> Headteacher</p> <p><input type="checkbox"/> Teachers/HLTAs/TAs/ Others involved in school swimming.</p>	
Scenario	Details of qualifications
<p>All staff accompanying students School Swimming at a Leisure Provider Pool:</p> <p>Names:</p>	<p>Support Teacher of School Swimming &amp; Water Safety. (Formerly ASA NCTP Fundamentals of School Swimming)</p> <p>Qualification (inc. date)</p>
<p>All staff supporting School Swimming at their own pool shallower than 1.2m</p>	<p>Support Teacher of School Swimming &amp; Water Safety.(Formerly ASA NCTP Fundamentals of School Swimming)</p> <p>or</p> <p>Swim England Teacher of School Swimming and Water Safety. (Formerly</p>

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Names:	ASA NCTP Aquatic Skills of School Swimming  Qualification (inc. date)
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Leisure Provider staff/School staff hold the appropriate Lifeguard qualifications:  
*Tick all that apply*

- National Pool Lifeguard Qualification (NPLQ)
- National Rescue Award for Swimming Teachers and Coaches (NRASTC)

**FOR SCHOOLS WHO USE LEISURE PROVIDER/OTHER FACILITY**

A signed and dated copy of the pool's Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) and current Risk Assessment (including medical conditions/additional needs) for the group involved are kept in the School Swimming Folder:  
*Tick all that apply*

- Yes
- To be actioned

The Headteacher, Teacher in charge of School Swimming and all staff involved in School Swimming have read and understood the pool's NOP and EAP:  
*Tick all that apply*

- Yes
- To be actioned

The Headteacher has requested the Pool's Insurance Details and these are included within the school swimming folder?  
*Tick all that apply*

- Yes
- To be actioned

A signed and dated record of the pool's current Hire Agreement is kept in the School Swimming Folder:  
*Tick all that apply*

- Yes
- To be actioned

The Headteacher and Teacher in charge of School Swimming are familiar with the pool's current Hire Agreement:

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*Tick all that apply*

- Yes
- To be actioned

Prior to School Swimming lessons commencing, the Teacher in charge of School Swimming (along with relevant others)

*Tick all that apply*

- Are aware of Health and Safety procedures (e.g. alarms, meeting points, First Aid Provision)
- Have agreed and signed Service Level Agreement
- Have completed a Trips & Visits Form
- Have provided the Leisure Provider with a list of up to date pupil's medical conditions
- Have undertaken a Risk Assessment for School Swimming and provided copy to EPA .

Prior to School Swimming lessons commencing, the Teacher in charge of School Swimming (along with relevant others) has sent permission letter to parents (which includes reference to wearing of goggles and appropriate swimwear) and kept copies on file.

*Tick all that apply*

- Yes
- To be actioned

Prior to School Swimming lessons commencing, the Teacher in charge of School Swimming (along with relevant others) given information on behavioural issues and specific medical conditions of the Leisure Providers and included it in the Risk Assessment?

*Tick all that apply*

- Yes
- To be actioned

**FOR SCHOOL WITH OWN POOL**

All staff who manage and operate the school swimming pool and school swimming pool plant, have received appropriate training and refresher training

Name	Course Title & Date

The Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) have been completed and updated as appropriate, signed and dated by the following to show that they understand the procedures:

*Tick all that apply*

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- Headteacher
- Governor in charge of School Swimming
- all staff involved in School Swimming
- to be actioned

An up to date Risk Assessment for School Swimming for all classes has been completed (including medical conditions), signed and dated by the Headteacher and Governors:

*Tick all that apply*

- Yes
- To be actioned

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