

Kent County Council Normal Operating System for Swimming lessons

Headcorn Primary School



This guidance is written in conjunction with Kent County Council's Safe Practice in School Swimming and Water Safety.

Approved by Head Teacher – May 2026

1. INTRODUCTION

The purpose of this procedure is to provide further detail on the health and safety working arrangements set out within the HSS062 Swimming Pool Management Standard to ensure that users experience a safe, clean, warm and friendly pool environment. It provides details of all aspects of pool supervision and duties. In addition to outlining processes relating to pool supervision, it includes rules, hazards and general information relating to the pool facilities. The Normal Operating Procedures and Emergency Action Plan will be referred throughout this document as NOP and EAP.

The NOP outlines the day-to-day operational procedures for the pool. These procedures also set out the arrangements for users' safety and should be followed by whoever is responsible for any group or persons using the pool or hydrotherapy pool.

The EAP outlines what emergency action to take, and who assumes leadership, in the event of foreseeable emergency situations arising.

This procedure is to be supplemented by site-specific information as follows:

- Appendix 1 - Description of Pool(s) including dimensions, depths, features, key hazards and risks, restrictions etc.
- Appendix 2 - Plan(s) of the Pool(s) including lifeguard stations, lifeguard rotation, pool alarm point(s), position of rescue equipment, location of first aid equipment etc.
- Appendix 3 - Site Specific Rules
- Appendix 4 - Maximum Bather Loads / Lifeguard Requirements for various sessions including emergency action plan (EAP), poolside rules/pr

Further information on the content of these appendices is contained within the relevant section of this procedure.

2. RESPONSIBILITIES

KCC responsibilities

School Leaders and Service Managers (or a nominated manager/supervisor) are responsible for ensuring all staff are made fully aware of this procedure and how to implement it prior to commencing their poolside duties.

It is the responsibility of the Head Teacher (or nominated Manager / Supervisor) to ensure that new staff are made fully aware of this procedure and how to implement it prior to commencing poolside duties.

Also ensuring there are sufficient resources on shift to enable full compliance with this procedure. Pool staff/teachers/service staff are responsible for supervising the operation of the pool(s) in accordance with this procedure and other key tasks are outlined in this procedure.

3. PROCESS

3.1 Pool Details

A description of the pools within the school will be included in Appendix 1. This will outline details of the pools including numbers, dimensions, depths and any particular features including booms and floating floors

Any associated key risks and particular restrictions to these areas, e.g. access, will be detailed in description. Further general details relating to pool features are included later in this procedure.

Plan(s) of the pool(s) will be included in Appendix 2. These will show all lifeguard stations, drown alarm points, observation chairs, observation zones, disabled hoists and other significant features. These plans (or separate plans included in Appendix 2) will also show the positions of rescue equipment.

3.2 Poolside Rescue Equipment

There will be a range of equipment on poolside for use in rescuing swimmers in difficulty. This equipment will be checked daily to ensure it is in its correct position and is fit for use. This will be recorded on the pool manager's daily check sheet.

All pool staff will ensure they are familiar with the emergency rescue equipment, where it is situated and how it is used before undertaking poolside duties. This equipment should remain in place until required for a rescue and will not be carried around poolside, particularly reach poles that have potential for causing an accident if not handled correctly. The location of this equipment is shown in Appendix 2.

3.3 Poolside Panic Alarms

The locations of static poolside alarm points are detailed in Appendix 2. There are two different types of alarm on poolside, which, if activated, require action from the staff on poolside duty. These are the pool / drown alarm and the fire alarm. Action to be taken on hearing these alarms will be outlined in the Pool Emergency Action plan (EAP). All staff will receive training on the use of the alarms as part of their induction. The Pool Manager (or Swimming Pool Technical Operator/Onsite Designated Supervisor) will test pool alarm(s) daily and record on the pool manager's daily check sheet. First aid boxes will be located in various areas of the school or service including the first aid room, and these locations will be listed in Appendix 2.

3.4 First Aid Rooms and Supplies

The Swimming Pool Technical Operator/Onsite Designated Supervisor, therapists, teachers, adults other than a teacher and other KCC staff must be aware of the location of the first aid room and their contents before undertaking poolside duties. The first aid room(s) must be kept clean at all times. First aid boxes will be located in various areas of the school or service including the first aid room, and these locations will be listed in Appendix 2. Checks of first aid boxes will be undertaken by a nominated member of staff to ensure sufficient stock is present.

3.5 Qualifications of Pool Staff

Appropriate training must be undertaken for the management of pool operations e.g. Pool Operators, Supervisors, Therapists along with Teachers and service staff should include the pool safe operating procedures (NOPs) and EAPs). The nominated Swimming Pool Technical Operator must complete a 3-day pool plant operator's training course every 3 years (in the use and operation of pool operations). The training course will include water testing, disinfection, temperature control, and management practices.

3.6 Lifeguard Training

The National Pool Lifeguard Qualification course is a minimum of 36 hours, followed by a practical assessment on swimming pool theory, water safety and how to spot potential hazards. The course will teach practical skills of lifeguarding, such as water rescue, casualty recovery, CPR and first aid.

3.7 Pool Staff – Key Tasks / Responsibilities

Key tasks of the pool staff whilst on duty include:

- working as part of a team to ensure the safe supervision of the pool, communicating as necessary using appropriate whistle, hand signals or speech
- maintaining a concentrated observation of the pool and its bathers in order to anticipate any problems before they occur and identify any emergency quickly. It should be noted that some bathers in difficulty might shout and splash whilst others give little indication of a problem but simply sink below the water. Concentrated vigilance is needed to detect genuine emergencies.
- carrying out rescues and initiating other emergency action as required
- carrying out initial first aid to a bather in the event of an injury or any other emergency
- ensuring that all bathers are behaving in an orderly manner.
- ensuring all poolside emergency equipment and first aid equipment is present and free from defects

3.8 Poolside Rules for Pool Staff

Any site-specific staff rules, including those required for each lifeguard position if applicable, will be outlined in Appendix 3, however, the following rules apply to all pools:

- Staff must not stand together talking on poolside unless it is absolutely necessary and is relevant to the job. This particularly applies during a rotation or changeover.
- Drinking is permitted on poolside from plastic drinking bottles only. EATING IS NOT PERMITTED AT POOLSIDE
- Equipment should be stored after use e.g. inflatable's, swimming lesson equipment, pool reach poles.

3.9 Communication on Poolside

The method of communication using a whistle is as follows:

- 1 Whistle Blast – attracts the attention of the pool users
- 2 Whistle Blasts – attracts the attention of other pool staff
- 3 Whistle Blasts – indicates that the lifeguard is about to take emergency action
- 1 Long Whistle Blast – attracts the attention of the pool users to prepare for an evacuation

Whistles will be used sparingly and will be followed by relevant verbal or visual instruction, e.g. hand signals. Consideration will be given, where possible, to the timeliness of the whistle in relation to the activities being carried out in order to ensure users, e.g. divers, are not unduly distracted.

Handheld radios will also be used as necessary. Radios will only be used for essential communication. Where appropriate, rules for use of these items will be documented.

3.10 Potential Risk Factors

A number of hazards exist in swimming pools and therefore pool staff will be alert and vigilant at all times when on duty. Hazards may generally be divided into 4 categories:

- People Hazards – those that are created by the bathers in the pool.
- Activity Hazards – those relating to the manner in which activities are undertaken.
- Lifeguard Hazards – those created by staff in the building.
- Physical Hazards – those relating to the design and structure of the pool.

The following have been factors in serious injuries and fatalities in swimming pools in the UK:

- Prior health problems e.g. asthma, epilepsy.
- Youth and inexperience (half of those who drown are 15 or under).
- Alcohol, drugs or food consumed before swimming.
- Unauthorised access to pools intended to be out of use.
- Weak or non-swimmers straying out of their depth.
- Diving into insufficient depth of water (leading to concussion or injury to head, neck or spine).
- Unruly behaviour and misuse of equipment.
- Unclear pool water, preventing casualties from being seen.
- Absence of, or inadequate response, by pool staff in an emergency.:

People Hazards

Wherever possible, it is desirable to observe bathers before they enter the water. This can identify users who may be considered a particular risk:

- Bathers in poor health
- The young
- Those who appear nervous
- Children with disabilities or special needs

Once bathers have entered the pool, it becomes much more difficult to spot potential problems. Those who need to be carefully observed, in addition to the above, include:

- Non or weak swimmers
- Swimmers wearing armbands or using other buoyancy aids including floats, inflatables etc.
- Show-offs or boisterous swimmers

Activity Hazards

Pool staff must be aware that accidents can happen as a result of seemingly harmless pool games or high-spirited activity. In certain cases pool staff will use their skill and judgement to change the activity pattern, thus reducing the risk. Certain activities however must be stopped: acrobatics, bombing, bullying, diving (unless in designated areas), fighting, misuse of equipment, pushing, running and tag games.

Lifeguard Hazards

Lifeguards should be role models to bathers, especially the younger ones using the pool. Therefore the manner in which pool staff behaves on poolside can have a profound effect on the standards of bather behaviour.

The positioning of the pool staff can seriously affect their capability to observe the water and may affect their ability to remain vigilant. Staff will therefore remain in close proximity to their designated position, should not, unless absolutely necessary, talk to other lifeguards supervising the pool, and will not leave their position unless cover is available.

Physical Pool Hazards

Site specific hazards, which have been identified following risk assessment, will be listed in Appendix 1, and on the pool plan, e.g. blind spots and areas affected by glare. Certain hazards however, may be common to a number of pools and these include:

- Exits from changing rooms leading directly onto poolside adjacent to deep water areas
- Entrapment dangers from inlets, outlets and other grills
- Diving pools and boards
- Awareness of pool water depths in different areas

Chemical Contamination Hazards

All chemicals generating chlorine on contact with water need to be kept cool with temperatures not exceeding 30 degrees C in closed containers away from damp and contamination by organic materials e.g. grease. Storage should be weather-tight and in a well-ventilated place away from the building.

3.11 General Poolside Rules for Bathers

It is essential that the behaviour of pupils does not detract from the enjoyment of others or represent a risk. Notices will be displayed around poolside to outline rules to the users. Specific safety signs, e.g. depth signs and various “do not” signs will be necessary. Pool staff will also communicate rules verbally to bathers as necessary. The following are general poolside rules and apply to all pools. Should any additional site-specific rules apply, these will be included in Appendix 3.

- No acrobatics in or around the poolside
- No bombing – this can be dangerous to other bathers
- No diving – varying water depths make it dangerous to dive, except in organised sessions in the diving pool
- No ducking – this is dangerous as it can cause panic and alarm
- No face masks, flippers, snorkels, or swim paddles. These are inappropriate as glass can be broken, flippers and paddles have sharp edges and can cut other bathers
- No food or drink on poolside
- No prams or pushchairs on poolside
- No photography – do not allow people to film or take photography either from poolside or the balcony unless prior permission has been granted from the Head Teacher
- Recognised swimwear must be worn at all times – T-shirts may be allowed if agreed beforehand. There may be a need for sensitivity to the religious and cultural needs of some ethnic groups
- No running – this is dangerous as the floor is wet and therefore may present a slip hazard
- No shouting or unnecessary distracting of the pool staff

3.12 Maximum Bather Loads / Lifeguard Ratios

Maximum bather loads will be determined following a risk assessment – see HSE document (HSG179 4th edition) Managing Health and Safety in Swimming Pools for guidance.

When determining the bather loads and numbers of staff available to supervise / lifeguard, consideration will be given to the various sessions programmed, e.g. swimming lessons and the degree of supervision required for each and not just to the pool size. In addition, the maximum load may be influenced by the type of bather, e.g. large numbers of children may require more supervision than the same number of adult bathers. The maximum bather loads for the pool(s) within the school are shown in Appendix 4, along with the lifeguard requirements for various sessions.

3.13 Poolside Positions

Lifeguard stations are shown on the plan at Appendix 2.

3.14 Controlling Access Onto Poolside

Access to poolside when the pool is not in use will be prevented through the use of physical barriers or supervision. Particular care will be taken when pool covers are in use. Any site-specific controls to prevent access to pool areas will be outlined in Appendix 1.

3.15 Pool Water Quality

Pool water testing will be carried out, in order to ensure the quality of the water is within parameters recommended by the ISRM and Pool Water Treatment Advisory Group. Only nominated and trained staff will carry out pool water tests. Any irregularities in the results will be reported immediately to the technical staff or other designated swimming pool maintenance manager. These tests will be documented on the pool managers daily check sheet and records retained on site.

3.16 Accidents / Injuries

Due to the nature of activities taking place within the school, accidents will happen, which will result in injuries to either public or staff. The majority of these will be minor accidents and may be treated on site without referring the person to hospital. For minor accidents treatment will be given at either the scene of the accident or in a first aid room.

Accidents will be recorded on KCC's accident/incident report form (HS157) and those reportable to the HSE will be recorded on form (F2508) Reporting of Injuries and Dangerous Occurrence forms (RIDDOR). The accident/incident may also need investigation using KCC's accident/investigation form (HS160).

4. APPENDICES

- Appendix 1 Description of Pool
- Appendix 2 Plan of the Pool
- Appendix 3 Site Specific Rules
- Appendix 4
 - Maximum Bather Loads / Lifeguard Requirements
 - EAP: Emergency Action Plan
 - Poolside Rules and Procedures
 - Swimming After School Club Rules
 - HSE (HSG179 4th edition) Managing Health & Safety in Swimming Pools

APPENDIX 1 – Description of Pool

*To consist of description of pools, including dimensions, depths, features, key hazards & risks, restrictions etc.
(Refer to sections 3.1, 3.12 and 3.17)*

Headcorn Primary School Pool

Dimensions: *Width 6 metres Length: 15 metres Depth: 99cm*

Features:

The pool is situated adjacent to the school kitchens and opposite the entrance to the new building Keeler House.

The pool area is accessed through a locked gate and the key is kept in the school office when the pool is not in use.

To the left of the gate are the male and female changing areas. These changing rooms have two access points as they double as standard changing rooms for after school sports.

Located in front of the changing area, down three steps, is a small building which serves as a plant room. Here is where the pump, boiler and emergency cut off switches are situated. It is on this level that the pool is positioned.

The school pool is of a raised configuration. Swimmers access the water via a set of steps.

The pool area is surrounded by a wooden fence and has a walkway all the way around.

Two of the four sides have a veranda style covering to protect from the glare of the sun.

There is a grassed area to the right of the pool where children not involved in lessons sit and wait away from the poolside and the lesson going on therein.

Key Hazards or Risks:

There is no clear line of sight between the school building and the pool area, in the event of an emergency contact between the pool and the school can be maintained via radio which the teacher should collect before the start of each session or by a mobile phone that the teacher should have on their person. The teacher in charge should notify the office when the lesson has begun and when all children are clear of the water at the end of the session.

Before leaving the pool all children must be counted out, the changing areas MUST be checked for any remaining swimmers and the changing room doors to the pool MUST be locked before leaving and securing the pool area.

Restrictions:

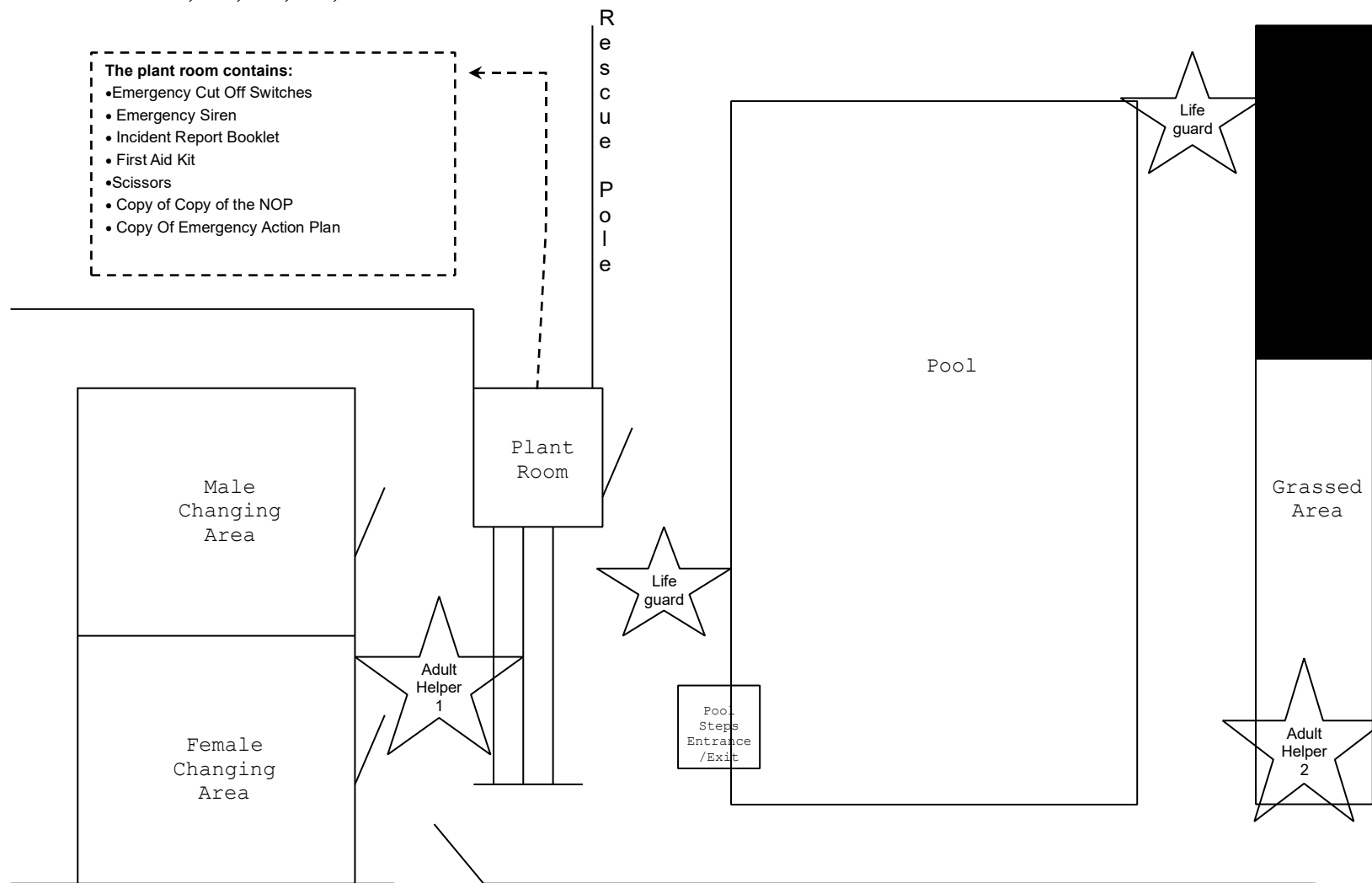
LOAD LIMIT:

*No more than **20 children** can ever be in the pool at one time. For class lessons, half of the pupils should be in the water, whilst the other half waits under the canopy on the grass. The canopy will shield them from the sun.*

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APPENDIX 2 – Plan of the Headcorn Primary School Pool Area

Plan(s) of the pool(s), including lifeguard stations, lifeguard rotation, drown alarm points, rescue equipment, location of first aid equipment etc.
Refer to sections 3.1, 3.2, 3.3, 3.4, 3.9 & 3.15



A standard first aid box will be located in the boiler room. If this ever requires replenishing, the staff member must inform the first aid co-ordinator.

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APPENDIX 3 – Site Specific Rules

To consist of site specific poolside rules, bather rules etc. (Refer to sections 3.8 & 3.13)

- *Staff must check that the pool temperature and chemical readings have been checked either first thing, or at midday, depending on the time of their session and that the pool has been deemed acceptable for use by the school's Premises Manager. The pool temperature should be around 28°C.*
 - *The teacher must be able to see all of the pupils throughout the session. (The session should not commence if the water is cloudy and the teacher is unable to see the bottom of the pool.)*
 - *Pupils must be registered or counted both before and after the lesson. A look out should also consistently perform headcounts during the swimming session.*
 - *Staff must check that all life saving equipment is adequate, appropriately placed, ready for access and in good condition.*
 - *Staff must have a mobile telephone, air horn **and** a walkie talkie with them when they teach a swimming session.*
 - *They must ensure that they can make contact with the office or Premises Manager or School Business Manager on the walkie talkie and that the air horn works.*
 - *The door to the boiler house must be kept open during a session, so that staff can reach the emergency stops for the filters, should they so require.*
 - *The boiler house door **must** be shut at the end of the session.*
 - *Staff must lock the changing room 'pool access' doors before leaving the pool area as these have dual purpose and are used for after school clubs.*
 - ***Before** doing this all changing areas must be double checked to ensure that they are clear of all swimmers and property.*
 - *Staff must lock the gate to the pool once the session is over.*
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- *Children should be encouraged to use the toilet before swimming.*
 - *They should also blow their noses before entering the pool.*
 - *All jewellery must be removed before entering the pool.*
 - *Children are not permitted to run on the pool surrounds.*
 - *Children must step through the footbath before entering the pool.*
 - *Children are not allowed to jump or dive into the pool.*
 - *Pupils must enter the pool via the steps.*
 - *Apart from in an emergency, pupils must exit the pool via the steps.*
 - *No child may swim within 14 days of a final bout of either sickness or diarrhoea.*
 - *No child may swim if they are obviously suffering from catarrh or a sore throat.*

Young Swimmers

- *Very young non swimmers, who can not reach the bottom of the pool, may wear floatation aids and it is essential that there are adults in the water to support them. This support must be in addition to the previously stated guidelines.*

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Medical Conditions

- *Pupils with epilepsy must be observed from the poolside at all times. Shimmering water may cause an attack.*

Clothing and Equipment

- *Swim wear must be suitable for the purpose.*
- *Goggles are allowed. Pupils must demonstrate that they can remove the items safely, by slipping them off the head.*
- *Goggles with glass lenses are banned.*
- *Children with verrucas can only swim if they wear a verruca sock.*
- *Everyone must wear a swimming hat to swim in the school pool. All hair must be secured within hat.*
- *Suitable poolside footwear must be worn around the poolside by adults and pupils.*

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:

- **one short blast** *calls for attention of pool users*
- **two short blasts** *calls for the attention of a lifeguard or member of staff, swimmers move to the side of the pool*
- **three short blasts** *indicates a lifeguard taking emergency action*
- **one long blast** *calls for the pool to be cleared.*

APPENDIX 4 – Other Key Information

- **Maximum Bather Loads / Lifeguard Requirements**
- **Poolside Rules** (see Appendix 3 for Site Specific Rules)
- **HSE Managing Health & - Safety in Swimming Pools** (see link: <https://www.hse.gov.uk>)

To consist of maximum bather loads / lifeguard requirements for various sessions (Refer to sections 3.14 & 3.26)

Maximum Bather Loads:

No more than **20 children** can ever be in the pool at one time. For class lessons, half of the pupils should be in the water, whilst the other half waits under the canopy on the grass. The canopy will shield them from the sun.

Lifeguard Requirements:

Structured Sessions– For structured sessions in the school pool the qualified teacher taking the session must hold the **ASA Module 2 Swimming Qualification** and the **NRASTC Poolside Safety Certificate**.

However these qualifications can be split between two people present at the poolside, with the teacher holding the teaching qualification and the Teaching Assistant holding the poolside safety qualification. However TAs at the poolside are not permitted to assist in the teaching of lessons unless they hold relevant qualifications to do so. **They are there to cover the safety aspects of the lesson only.**

This is in addition to two other adults who must be DBS checked; one to supervise the changing area and the other to watch those children not swimming.

Unstructured Sessions – For unstructured sessions a **qualified lifeguard** must be present or a person or persons holding **QTS (Qualified Teacher Status)** and the required **ASA** Module qualifications for swimming. Another person can hold relevant poolside safety qualification.

Staffing Levels and Qualifications

- Each lesson must have at least two adults supervising it, both of whom must be out of the water.
- One adult may teach, whilst the other must maintain a constant look out and scan the pool for any incidents. The look out must fulfil this role alone and may not teach a group.
- If there are more than two adults present at the session, the third may also teach a group. They may enter the water to teach, if that is deemed preferable.
- All parents who help with swimming lessons must have a DBS check.
- All lessons, or 'structured sessions', must be taught by someone with an appropriate ASA swimming teaching/coaching qualification.

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SUMMARY OF MINIMUM QUALIFICATIONS

ROLE	TEACHING QUALIFICATION	LIFEGUARD QUALIFICATION
<i>Specialist Swimming Teacher/Instructor</i>	<i>ASA Teacher (Level 2)</i>	<i>RLSS National Rescue Test for Teachers & Coaches Or NRASTC Pool Safety Award Or none if an NPLQ lifeguard is provided by the pool</i>
<i>Specialist Swimming Teacher/Instructor for swimmers with disabilities</i>	<i>ASA Teacher (Disabilities)</i>	<i>RLSS National Rescue Test for Supervisors of Swimmers with Disabilities Or none if an NPLQ lifeguard is provided by the pool</i>
<i>Class Teacher or TA assisting Specialist teacher</i>	<i>ASA National Curriculum Training Programme Module 1 or ASA Teacher (Level 1)</i>	<i>NRASTC Pool Safety Award Or none with NPLQ Lifeguard</i>
<i>Class Teacher or TA working in a shallow water learner pool (no specialist teacher or lifeguard)</i>	<i>ASA National Curriculum Training Programme Module 2</i>	<i>NRASTC Pool Safety Award Or RLSS National Rescue Test for Teachers & Coaches</i>
<i>AOTTs</i>	<i>ASA Helpers Certificate</i>	<i>None with NPLQ Lifeguard</i>
<i>Lifeguard for un-programmed sessions</i>		<i>RLSS National Pool Lifeguard Qualification</i>
<i>Plant Operation</i>	<i>Foundation Pool Plant Operators Course (ISRM) School Pool Carer's Course (ISRM) National Pool Plant Operators Course (ISRM)</i>	

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NB Lifesaving and life guarding qualifications are valid for 2 years and will be renewed as required Or can demonstrate the following:

- Has QTS*
- a thorough knowledge of the national Curriculum requirements for Swimming and Water Safety*
- experience of working with children in Swimming and Water Safety activities*
- evidence of recent CPD to update their understanding in the areas outlined above*

And

- The National Rescue Award for Swimming Teachers and Coaches (NRASTC) or equivalent*

Or are able to demonstrate the following:

- A thorough knowledge of the pool's routines, normal and emergency operating procedures i.e. location of telephones, emergency equipment, first aid kit etc and be aware of potential risk factors*
- Be able to administer expired air resuscitation (EAR)*
- Be able to administer CPR*
- Be able to initiate emergency procedures*
- Be able to recognise pupils in potential difficulties*
- Be able to affect a rescue using whatever methods are required, including entering the water and landing a casualty*

Specific Support Staff have now received the NRASTC Pool Side Safety Certificate and are fully trained in water rescue techniques including the rescue of casualties with suspected spinal injuries from water and CPR.