

KCC Health and Safety

Swimming Pool Management Standard



Introduction

Pool Operators are legally required under the Health and Safety at Work Act 1974 to protect the health and safety of employees, and others including pool users by managing risks of using swimming pools including hydrotherapy pools. This standard outlines the key legislation, responsibilities and safe systems of work to help minimise the risks to employees and pool users without unduly restricting enjoyable and beneficial pool activities. However, Pool Operators must review the Health and Safety Executive's (HSE) HSG179 health and safety in swimming pools guidance (containing the principles to help promote a safer environment) and other competent organisations and/or other specific industry guidance.

Risk assessments are central to the effective management of health and safety, and it is the duty of Pool Operators to ensure risks are identified, assessed, and controlled to prevent harm to employees and others.

The appendices in this standard contain model procedures, forms, and a swimming pool risk assessment template which must be adapted and made specific to each KCC school or service pool.

Legal requirement

Every pool operator is responsible for the health and safety of employees, pool users and other people on the premises.

The Health and Safety at Work Act 1974 – employers must, so far as is reasonably practicable, ensure the health and safety of employees and others who have access to their work environment or may be affected by their work activities. The Act mandates that employees and members of the public are not put at risk by equipment and plant that workplaces are safe, safe systems of work in place and there is a provision of information, instruction, training and supervision needed to ensure safety. This will also include the cleaning and maintenance of the pool, and cannot be a delegated responsibility, so also applies to actions of contractors as well as staff.

The Management of Health and Safety at Work Regulations 1999 – requires Pool Operators to undertake an assessment of the risks which may affect employees and others, as a result of the work activity. These requirements also consider members of the public using pools. Appropriate action must be taken to eliminate or reduce risks as far as is reasonably practicable.

Control of Substances Hazardous to Health Regulations (COSHH) – as a Pool Operator, you must carry out an assessment to protect your employees and others against health risks from hazardous substances used at work. Having assessed the risks decide what precautions are necessary to prevent or control exposure and

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monitor the procedures making sure the control measures are used and maintained and that employees are informed and trained of those risks.

Dangerous Substances and Explosive Atmospheres Regulations (DSEAR) – chemicals used for pool water treatment can cause harm as a result of a fire or explosion if they are not properly controlled and stored. Pool Operators must have a safe system of work in place to ensure deliveries of hazardous chemicals are properly managed.

Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) – specific work-related accidents/incidents and cases of ill health must be reported to the Health and Safety Executive (HSE) and KCC's schools and services should also report via KCC's online reporting form.

HSG179 Health and Safety in swimming pools - the document gives management advice and technical information on health and safety in swimming pool design and pool water treatment.

Who should follow this health and safety standard?

This standard should be followed by KCC's Voluntary Controlled and Community schools, and other KCC services who have a swimming or hydrotherapy pool on site or uses another public utility e.g. local swimming pool.

Management expectations within KCC – responsibilities

Kent County Council has overall responsibility for ensuring the safety in swimming pools as an employer. As part of this responsibility is this standard for swimming pools (including hydrotherapy pools) ensuring that its employees receive any necessary training to carry out their role.

School Leaders, Service Directors and Heads are responsible, so far as is reasonably practicable, for ensuring the health, safety, and care at work of all employees and others who use their services. Safe systems of work must be implemented and working procedures and processes documented. This responsibility includes ensuring appropriate training is sought, organised and completed by relevant staff to provide competent and professional supervision, teaching and management of the pool operations.

The Swimming Pool Technical Operator/Onsite Designated Supervisor to meet health and safety responsibilities and comply with this good working practice - a nominated employee must be delegated to ensure risks are adequately identified, assessed and controlled to prevent harm and apply pool safety and procedures with the setting. A 3-day pool plant operators training course must be undertaken every 3 years (in the use and operation of pool operations, including hydro pool, if appropriate). Training includes water testing, disinfection, temperature control, and management practices.

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The Swimming Pool Technical Operator/Onsite Designated Supervisor duties include the operation of the school/service's own swimming or hydrotherapy pool facility or use of a third-party pool. It also includes monitoring and recording of:

- Appropriate risks assessments e.g. swimming pool, COSHH.
- Start up and shut down of the swimming pool.
- Testing and controlling pool water.
- Dosing chemicals.
- How to deal with bodily fluids in the water.
- Pool safety operation procedures - Normal Operating Plan (NOP) and Emergency Action Plan EAP).
- Qualifications, training of staff and record keeping.
- Any instructions issued to staff.
- Conditions of hire or arrangements for use of the pool.

Lifeguards

Pool operators have a responsibility for the safety of all who use their pools.

Supervisors, therapists, teachers, adult other than a teacher (AOTTS) and other KCC staff - must complete and undertake appropriate training required for the management of pool operations:

In a school pool (depth more than 1.0m)	this must be a teacher, a swimming instructor or an AOTT
In a public pool	this must be a qualified pool lifeguard or an AOTT with the same qualification
In a private pool	this must be a qualified lifeguard, a teacher, a swimming teacher or an AOTT
Hydrotherapy pool	this must be specialist staff (e.g. a physiotherapist), a teacher, a swimming teacher or an AOTT
in a learner pool (depth less than 1.0m)	this must be a teacher, swimming instructor or an AOTT with a minimum of First Aid at Work qualification

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

- Be familiar with the pool NOP and EAP.
- Maintain constant observation of the pool and pool users.
- Carry out rescues and initiate any other emergency action required.
- Be able to affect a rescue from the bottom of the deepest part of the pool.
- Administer first aid.
- Prevent unsafe activities.
- Ensure that the pool is never left unsupervised whilst in use.
- Assist in the running of emergency drills.
- Secure the pool against unauthorised access when not in use.

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- Communicate with pupils, service users, swimming instructors, teaching staff to achieve the above.

Therapists, teachers and other KCC staff have a duty of care that operates for any activity in which children are involved and cannot transfer that duty to anyone else. This applies to all pool activities within the service or school curriculum/extra-curricular activities organised during and outside the school or service hours, whether on or off site.

In relation to swimming this means that:

- Children are appropriately supervised when changing – review Swim England’s Safeguarding Policy or your own safeguarding principles.
- Children are always under control.
- A recorded headcount is taken before, during and after sessions and this procedure will be referenced in your swimming pool risk assessment.
- Normal Operating Procedures and Emergency Action Plans are followed and enforced as necessary.

Safe systems of work

There must be safe systems of work in place to eliminate or reduce the risk of harm to employees and others and all procedures and processes must be documented, reviewed, and circulated to all those involved in the activity including:

Pool risk assessment

A robust and sufficient swimming or hydrotherapy pool risk assessment must be in place before use which considers safe operating procedures and should include any journey to and from the pool. This risk assessment forms part of the Pool Safety Operating Procedures (PSOP). The assessment must be circulated and acknowledged by all employees involved in the activity and reviewed annually or earlier if there is an incident. The risk assessment must be suitable and sufficient and consider (this list is not exhaustive):

- Any special needs requirements or medical conditions.
- Cleaning and hygiene.
- Control of admissions to the pool.
- Emergency equipment.
- First aid requirement (first aid needs assessment).
- Handling, storage, and disposal of chemicals (COSHH).
- Hoists and other manual handling of persons aids.
- Lighting, temperature, cleanliness and ventilation.
- Maintenance, servicing and inspections.
- Managing pool water quality, and hot/cold water systems.
- Preventing unauthorised access.

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- Safety information – emergency alarm, signage and equipment
- Supervision and safeguarding.
- Teaching, supervising and pool operation.
- Training required.
- Water temperature, testing and monitoring.

Pool safe operating procedures (PSOPs)

PSOPs can be based on the information from the pool risk assessment, and they should consist of:

- The Normal Operating Plan (NOP) - sets out the way a pool operates daily, including details of the layout, plant, equipment, manner of use, supervision arrangements and user group characteristics.
- The Emergency Action Plan (EAP) - details how to respond effectively by giving specific instructions on the action to be taken if there is an emergency in the pool, changing facilities and associated plant and equipment. The level of detail of these procedures should be proportionate to the risk. Initiating emergency procedures at the earliest stage of an incident can significantly reduce the impact on people, premises and the environment.

See Appendix B and C for further guidance on NOPs and EAPs.

Training and competence

This can be described as the combination of training, skills, experience and knowledge that a person has and their ability to apply them to perform a task safely. Other factors, such as attitude and physical ability, can also affect someone's competence.

Appropriate training must be undertaken by appropriate staff for the management of pool operations e.g. Swimming Pool Technical Operators/Onsite Designated Supervisor, Lifeguards, and should include the pool safe operating procedures (NOPs) and EAPs). The following training providers may be suitable:

- Swimming Teachers Association is an international award-winning charity working towards the objective of preserving human life by the teaching of swimming, lifesaving and survival techniques.
- Swim England Qualifications is an Awarding Organisation Partner with CIMSPA (the Chartered Institute for the Management of Sports and Physical Activity) and is a founding contributor to the development of new professional standards for the swimming industry. Swim England is the only recognised national governing body for swimming in England See other organisations in Section 'Additional Information'.

COSHH

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The Swimming Pool Technical Operator/Onsite Designated Supervisor or any others that may be involved in the storage, use or handling of chemicals must ensure the COSHH Regulations 2002 are adhered to e.g. training, use, handling, storage, safety data sheets, and spill procedures and that COSHH risk assessments are completed for each hazardous chemical/substance used. After assessing the risks, they must decide what precautions are necessary to prevent or control exposure. Record and monitor these control measures to ensure they are used effectively and ensure employees are properly informed, trained and supervised. This includes cleaning and maintenance staff.

Treatment of pool water is essential to ensure that employees and pool users are not exposed to risks of infection from contamination of the pool water by microbiological organisms. Water treatment should be carried out in line with PWTAG Code of Practice – sections 3 – 6inc and the Swimming Pool Water Book. Pool Operators must also have procedures to cover faecal fouling incidents and employees must be trained in these procedures. as detailed in section 8 Code of Practice – Pool water Contamination Emergency Procedures.

There are other hazardous substances including microbiological organisms in pool water e.g. Legionella and cryptosporidium (due to contamination from a failure to manage pool water quality). Hot and cold-water systems also present a foreseeable risk of exposure to Legionella bacteria if not properly managed. All showers should be managed in accordance with the HSE's L8 Legionnaires' disease. The Legionella risk assessment undertaken every 2 years, with an annual interim review must include the inspection of the swimming pool and showers, and any actions must be dealt with by order of priority.

A list of all hazardous chemicals and substances used for the pool and their location should be kept in the fire folder and given to the Kent Fire and Rescue Service or other emergency service as required.

Pool chemicals/substances must be stored in a weather-tight, fully secure and well-ventilated place away from the building and that is only accessible by authorised staff. There must be appropriate COSHH hazardous warning signs on doors. The ecological section of the safety data sheet must be reviewed if disposing of any hazardous chemicals/substances to ensure COSHH regulations are followed.

Any chemical spillages should be dealt with by staff who know what chemical it is and trained in handling spills. Appropriate PPE should be worn and ensuring all staff and others are fully protected and to follow the emergency procedures.

Pool access for disabled persons

Hoists are one way of helping wheelchair users to get in and out of a pool. You should carefully consider the location of hoists or other moving and handling equipment to ensure they are of maximum benefit, and do not represent an obstruction to other users around the pool including access and visibility from supervision. Employees must be fully trained and competent in the use of any

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moving and handling equipment. All moving and handling of persons equipment e.g. hoists is subject to a service and inspection by a competent company/person every 6 months under the Lifting Operations and Lifting Equipment Regulations 1998. If a hoist is not fit for purpose or faulty it must not be used and should be cordoned off and an appropriate sign attached - arrange for immediate repair or replacement.

Hydrotherapy pools

Water-based activities in hydrotherapy pools requires higher levels of supervision, often on a one-to-one basis in the water. These pools still require a point of contact with sufficient training to understand:

- All potential microbial, chemical and physical hazards and the risks to health associated with them.
- The users' needs and risk factors.
- Pool plant flow dynamics and treatment.
- Monitoring requirements and what results mean.
- Appropriate remedial actions.
- Procedure in the event of faecal contamination/bodily fluids.
- Emergency situations.
- Pool closing / reopening criteria.

It is a requirement to keep accurate daily logs which contain details of:

- Chemical disinfection.
- Pool water quality monitoring and pool chemistry testing.
- Water and air temperatures.
- Humidity levels.
- Backwashing.
- Microbiological testing.

These pools are not usually deep-water and so, for teachers and physiotherapists as well as KCC service staff, the First Aid at Work qualification should be an appropriate qualification for life guarding of this pool. Adults in the water are only able to supervise the pupil or service user they are assisting and should not be counted in the supervising ratios.

The lifeguarding duties must still be carried out by qualified people on the side of the pool. The lifeguards should have completed a recognised professional course in managing hydrotherapy activities. A variety of skills are required stemming from an assessment of each child's individual requirements. Schools and services with hydrotherapy pools should establish an apprenticeship programme for new staff to work with experienced staff before they take full responsibility for sessions.

Hydrotherapy pool cleaning schedules

For healthcare use clinical standard infection protocols are required and should also include:

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- Designated cleaning equipment for toilets, changing rooms and pool concourse.
- Transfer channels and grilles (including their undersides).
- Pool floors and scum line.
- Pool covers.
- Therapy equipment.

Cleaning, maintenance, and servicing

A contract must be in place to clean, service and maintain pools, ventilation, and air conditioning systems and records kept on file. You must provide and maintain plant and systems of work that are, so far as is reasonably practicable, safe and without risks to health. Manufacturer's instructions on operation of plant and equipment should be available. The Swimming Pool Technical Operator/Onsite Designated Supervisor should ensure that inspections and tests are carried out at the specified intervals as a preventative measure, and any remedial action is promptly dealt with.

If you are draining water from your pool into the mains foul sewer you must have a Trade Effluent Licence or a letter of exemption from your sewage undertaker e.g. Southern Water. This is required due to the chemicals used in the pool, and permission is required to allow for the discharge to enter the sewage system. Contact KCC's Environment Team by emailing scc@kent.gov.uk for help and guidance on your responsibilities.

Personal protective equipment (PPE)

Where it is reasonably practicable to do so, engineering controls, such as automatic dosing systems, must be used in preference to PPE. PPE must only be used as a last resort, but even where engineering controls and safe systems of work have been applied, some hazards might remain. If so, the Swimming Pool Technical Operator/Onsite Designated Supervisor must identify what PPE is required for specific tasks and the level of protection that should be provided.

The plant room should contain the necessary PPE to ensure the health and safety of anyone handling hazardous substances. PPE provision will depend on risk and may include:

- An eyewash station.
- A nose and mouth respirator (EN 140:1998 and BS EN 14387:2004).
- Rubber gloves (BS EN 420:2003).
- Goggles or face shield (BS EN 166:1996).
- Wellington boots (BS EN ISO 20345:2011).
- Apron or overalls (BS EN 14605:2005 and EN 13034:2005).

Summary

It is vitally important robust safe systems of work are implemented for managing and operating swimming pools. A thorough investigation of the risks is required, and

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comprehensive control measures are essential to eliminating or reducing the risks to employees and others using the pool. By prioritising safety and well-being, schools and services will comply with the legal requirements as mentioned in this standard.

Additional information

All schools or services who have a pool must review the **HSE - HSG 179** Managing health and safety in swimming pools (4th Edition 2018). Other guidance is available:

- Amateur Swimming Association
- Association for Physical Education - Safe practice in physical education and school sport
- Pool Water Treatment Advisory Group Code of Practice
- Swimming Teachers Association
- The British Swimming Pool Federation
- The Pool Water Treatment Advisory Group (PWTAG) Code of Practice
- The Royal Life Saving Society UK

Appendices

Appendix A - Swimming Pools (including hydrotherapy pools) risk assessment

Appendix B - Normal Operating Procedure (NOP)

Appendix C - Emergency Action Plan (EAP)

Appendix D - Induction Checklist