

of Programmed Swimming Lessons and Training Sessions in Swimming Pools

### 1.0 Introduction

This guidance has been produced for owners and operators of all public and private swimming pools in the UK who have a duty to ensure the safety of swimming teaching (lessons) and coaching (training) activities. It is also for those who are responsible for the provision of these services such as schools, swim schools, local authorities, non-profit organisations, clubs, private clubs and commercial management organisations.

This guidance should be used in conjunction with the Health and Safety Executive publication Managing Health and Safety in Swimming Pools – HSG179, which provides guidance for those who have any involvement with the operation and management of health and safety in swimming pools.

Owners, operators and occupiers of swimming pools must follow the general duties and responsibilities in the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999. They are obliged to take all reasonable and practicable measures to ensure teaching and coaching activities are conducted safely.

Owners and operators have the overall responsibility for every person on the premises. Hirers such as schools and clubs also have responsibilities and the relationship between the pool operator and the hirer's responsibilities should be specified in the operating procedures and pool hire agreement. Care should be taken if/when sharing data on qualifications and ongoing training between owners, operators and occupiers to ensure full compliance with GDPR.

### 2.0 What does 'safe supervision' mean?

Safe supervision refers to a safe learning environment where those participating are supervised throughout to ensure their safety. It does not address the quality of the swimming lessons or coached sessions, or the ability of the swimming teacher to teach swimming, which is addressed by organisations specialising in swimming teaching and coaching.

Every swimming pool must operate to legislation and guidance in the UK. Sitespecific factors are key in developing the procedures and processes for safe supervision.

### 3.0 Definitions/clarifications

What makes a teacher or coach (HSG179 para 102) suitably competent to provide safe supervision for their class/squad?

For a teacher/coach to be suitably competent to provide safe supervision, an individual should have been trained and assessed as competent to:

- supervise the group.
- recognise when someone requires any form of help.
- provide the necessary rescue.
- be able to recover the individual to a safe place on the side of the pool.
- provide immediate first aid.
- follow site-specific procedures for each venue where they provide teaching/coaching.

They must have one of the below qualifications along with site-specific and regular ongoing competency-assessed CPD training relative to their lifeguard/rescue qualification:

- RLSS UK National Pool Lifeguard Qualification (NPLQ).
- STA Pool Lifeguarding.
- RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC).
- RLSS UK National Rescue Award for Swimming Teachers and Coaches Light (NRASTC Light)\*.
- STA Safety Award for Teachers.

<sup>\*</sup> Please note: for those holding RLSS UK NRASTC Light Award, staff qualified as Lifeguards or First Aiders should be available to respond quickly to a swimming teacher/coach in the event of an emergency.

Please refer to HSG179 137-147 for more information on ongoing CPD/refresher training.

#### **Qualification Guide**

Definition	Qualifications	Competency requirement	Suitable for
Pool lifeguard- qualified teachers/coaches	<ul> <li>RLSS UK National Pool Lifeguard Qualification (NPLQ).</li> <li>STA Pool Lifeguarding.</li> </ul>	<ul> <li>Site-specific PSOP.</li> <li>Content of qualification (CPD).</li> <li>Rescue a manikin from the deepest part of the pool they are working at.</li> </ul>	Programmed sessions unprogrammed sessions.*
Rescue-qualified teachers/coaches	<ul> <li>RLSS UK National Rescue Award for Swimming Teachers and Coaches (NRASTC).</li> <li>RLSS UK National Rescue Award for Swimming Teachers and Coaches Light (NRASTC Light).</li> <li>STA Safety Award for Teachers.</li> </ul>	<ul> <li>Site-specific PSOP.</li> <li>Content of qualification (CPD).</li> <li>Rescue a manikin from the deepest part of the pool they are working at.</li> <li>Deep water spinal rescue and recovery from the water where required (above chest height or out of comfortable standing depth of the rescuer).</li> </ul>	Programmed sessions ONLY Supervision can only be provided for the lesson/session they are teaching/ coaching.*

\*When pool lifeguard-qualified teachers/coaches are supervising unprogrammed pool sessions as part of a lesson, an additional risk assessment should be carried out to ensure participants are supervised appropriately as per the swimming pool admission policy. Please see HSG179 (76-101) for guidance.

\*Where programmed sessions are the only activity in the pool, rescue-qualified teachers/coaches may provide the safety cover for the activity. The operator should conduct a full risk assessment to ensure this is suitable. Swimming teachers/coaches should be responsible for independent groups and not have general supervision responsibility across the pool/area.

#### **Helpers/spotters**

A helper/spotter provides support to the teacher by watching and supporting participants from the side of the pool or in the water.

Helpers/spotters who do not hold a pool lifeguard/rescue qualification do not have the relevant training or assessed competence to distinguish a swimmer in difficulty and cannot provide supervision and should not be considered as a control measure for risk reduction when risk assessing safe supervision.

Helpers and support teachers/coaches who are not part of the identified pool lifeguard/rescue cover for the pool must have their roles and responsibilities clearly identified in the PSOP.

### **Unprogrammed sessions**

Unprogrammed sessions do not have a formal structure, are not disciplined, controlled and continually monitored. There is an increased risk during unprogrammed sessions due to the unpredictable nature of the participants. When a teacher/coach designates time during a lesson to 'free play' this will become unprogrammed and a teacher/coach with a rescue qualification would not be suitable to provide supervision.

Examples include: Public/general swim, fun sessions and float/inflatable sessions.

### **Programmed sessions**

Programmed activities are those with a formal structure, i.e. disciplined, supervised or controlled and continuously monitored from the poolside.

Examples include: swimming lessons, parent/carer and baby sessions, coaching sessions and other tuition such as competitive swimming, diving, water aerobics, artistic swimming, water polo and teaching/coaching water activities to people with special educational needs or disabilities (SEND).

#### Risk assessment

'Risk assessment' is a term used to describe the overall process or method by which you identify hazards and risk factors that have the potential to cause harm. You then determine suitable and sufficient actions and measures to eliminate the hazard, or control the risk when the hazard cannot be eliminated.

As an employer, you're required by law to protect your employees, and others, from harm under the Management of Health and Safety at Work Regulations 1999: www.legislation.gov.uk/uksi/1999/3242/contents

#### **Pool Safety Operating Procedures (PSOP)**

The PSOP comprises of two parts:

- 1. Normal Operating Procedure (NOP)
  The NOP sets out the way a pool operates on a daily basis, including details of the layout, equipment, manner of use, user group characteristics, etc.
- 2. Emergency Action Plan (EAP)
  The EAP gives specific instructions on the action to be taken, by all staff, if
  there is an emergency such as a pool incident, evacuation, plant failure, etc.

All staff and hirers with responsibility for supervision should be trained and competent in the content and delivery of the PSOP.

#### Shared use

Where the pool is in shared use and clearly divided between programmed and unprogrammed aquatic activities, suitably pool lifeguard/rescue qualified teachers/coaches may take responsibility (both for safety cover and teaching and coaching) – but only for the programmed area of the pool.

The agreed participants:teacher/coach ratio established by a risk assessment of that pool and identified within that pool's PSOP should be followed.

The PSOP should clearly identify the emergency roles of the lifeguards, teachers/coaches and additional helpers for all areas of the pool. Staff will need to understand how they should manage the incident for the area of the pool they are using.

Where the shared use is not clearly defined between programmed and unprogrammed activities, supervision must be provided in accordance with the pool's PSOP for a pool operating in an unprogrammed session. This would require the lifeguard staffing of the pool to take into consideration all of the swimmers in the pool, whether within the programmed activity or unprogrammed activity.

#### More information is available in:

- HSG179: Health and Safety in Swimming Pools (76-101) www.hse.gov.uk/pubns/books/hsg179.htm
- Royal Life Saving Society UK (RLSS UK) website www.rlss.org.uk/hsg179

## 4.0 What does HSG179: Health and Safety in Swimming Pools say about safe supervision for coaching/teaching sessions?

The Health and Safety Executive publication Managing Health and Safety in Swimming Pools – HSG179 details the following for the supervision of coaching and teaching sessions:

#### Safeguarding coaching/teaching session

102. Suitably competent teachers and coaches may take responsibility, both for supervision and teaching/coaching, of their class/squad.

103. The number of participants in a swimming lesson should be determined by your risk assessment, with additional consideration given to the:

- swimming ability of the participants and how they respond to the teacher in a class environment;
- age of the participants and their physical attributes in relation to the swimming pool configuration;
- temperature of the pool water and its effect on younger participants, elderly participants and participants with disabilities.

104. There is no optimum or maximum ratio but these factors will have an impact on the numbers in the class. Teachers and coaches may take responsibility, both for supervision and teaching/coaching of their class/squad. See <a href="https://www.swimming.org/swimengland/worker-health-and-safety">www.swimming.org/swimengland/worker-health-and-safety</a>

More information can be found at www.sta.co.uk/wp-content/uploads/2024/04/Code-of-Practice-v24.1.pdf

### 5.0 Operators' responsibilities

#### Risk assessment

The role of the risk assessment and the safety factors that must be considered, which are primarily the responsibility of pool operator, are detailed within HSG179.

For swimming pools with technology, guidance on the use of technology to aid observation can be found in HSG179 (116-125).

Additionally, there are BS EN Standards addressing the safety of the design and management of swimming pools (BS EN 15288 series and PAS 520), pool equipment (BS EN 13451 series) and teaching aids (BS EN 13138) that can be used when formulating safe operating procedures.

Local authority health and safety may also have their own guidance or policy, which should be taken into consideration – particularly if they are included within the operator contract.

Following this guidance, a risk assessment on programmed/structured sessions must be produced. Under certain circumstances, programmed sessions may have fewer lifeguards than unprogrammed/unstructured sessions, Lifeguard Zone Visibility Tests (LZVTs) and the ability for a lifeguard to get to reach the furthest part of their zone within 20 seconds will help assess the number required.

The risk assessment should take into account the increased/decreased potential risk based on the skills, experience and qualifications of those supervising sessions. The outcome of the risk assessment will set the supervision arrangements, these must be detailed in the site's PSOP and staff trained in the arrangements.

### 6.0 Teachers'/coaches' responsibilities

Teachers/coaches must be trained, and able to carry out their role within the remit of their qualification and pool design. It may be an operator's requirement that swimming teachers/ coaches hold their own individual insurance. A swimming teacher/coach may wish to hold their own insurance to protect against any direct civil action or loss of income etc.

Teachers and coaches must ensure that:

they attend a full induction at their workplace.

- they understand the reason for and process of risk assessment.
- they are fully trained, understand and can implement the site's PSOP sections that are relevant to their role.
- the emergency procedures to evacuate the water and summon assistance are practised regularly in accordance with the requirements of the EAP.
- the participants understand and practise their response in an emergency.
- they understand and can conduct dynamic risk assessments of their teaching/coaching area prior to conducting lessons and notify the relevant person of any safety issues that are identified.
- they attend training and/or CPD courses as set out by their employer.
- if they provide safe supervision they can rescue an approved rescue manikin from the deepest part of the pool.
- if they provide safe supervision in deep water they can conduct a deep water spinal rescue and recovery from the water where required.

Whether fulfilling the teacher/coach role only, or fulfilling the pool lifeguard/rescue qualified teacher/coach role, the teacher/coach must exercise constant supervision and be able to observe all the participants at all times.

The teacher/coach has the legal responsibility to report any unsafe practices or hazards to the pool management.

In extreme circumstances a teacher/coach may have to consider whether it is safe to continue with an activity – but this decision should not be undertaken without first notifying and consulting with the appropriate supervisor and/or employer.

### 7.0 Teaching/coaching positions

#### Teaching/coaching from the poolside

Teaching/coaching from the poolside provides the best position to oversee the whole group in terms of safety and to provide appropriate feedback on the performance of each participant within the group. Teachers/coaches must position themselves so

that they be seen and heard AND so they can see all participants at ALL times to be able to provide safe supervision.

Operators should check to ensure that teachers/coaches can see the whole group they are teaching/coaching at any time and there are no obstructions, for example, glare, reflection or blind spots.

### Teaching in the water

It is recognised that in some circumstances the pool operator or teacher/coach will have assessed the risk and may feel it is more appropriate to teach from within the water. This practice should only be considered after carrying out a risk assessment giving careful consideration to all the potential factors. An example of this may be where an adult and baby session is taking place and there is one-on-one direct supervision of each child in shallow water.

Factors to take into account include pool depth, ability of participants, age of participants, visibility, ability to respond to an emergency, safeguarding the participants and the use of floatation equipment and lifesaving support. At all times, the teacher/coach must be able to clearly see all participants and be close enough to provide appropriate methods of manual support should this be required.

Where a teacher/coach is teaching in the water, it is strongly advised that a lifeguard is also present at all times unless the risk assessment has determined that an adequate level of safety cover can be provided. If teaching in the water without additional lifeguard cover a risk assessment should be conducted. The risk assessment should take into account the ability to see the whole group and teaching area at all times including the pool floor and blind spots, access to alarms, access to controls, poolside spectators and action in an emergency – including lone working if appropriate.

Please refer to HSG179 (84-92) when considering supervision for sessions with separate lifeguard cover to the teacher/coach. HSG179 section 89 gives indicative numbers of lifeguards based on pool area.

### 8.0 Participant/Instructor ratios

The recommended ratios for supervision where the teacher/coach holds a pool lifeguard/rescue qualification can be found further in this document. When considering adapting the recommended ratios a risk assessment should be conducted.

Example factors for increasing or decreasing the ratios can be found in the below table:

Increase in ratios	Decrease in ratios
Dedicated lifeguard observing the lesson area only.	Poor definition of the teaching/coaching area.
Additional helper(s) in the water (their level of qualification should be considered – i.e. Level 1 Swimming Assistant).	Sharing the space with another activity.
Shallow water area. (Shallow water is defined by the risk assessment in relation to the height of the participant.)	If the area is deeper than is suitable for that level of lesson. (Deep water is defined by the risk assessment in relation to the height of the participant.)
Direct one-on-one supervision in the water by an adult for each child.	Poor water clarity.
	Steep floor gradients or uneven pool floor.
	Ineffective non-slip tiles on the pool floor.
	Language and additional needs of participants.
	Lone working or where the teacher/coach is the only rescue/pool lifeguard qualified team member on poolside.

#### Other considerations include:

- the duration of the teaching/coaching session and provision for breaks away from poolside
- access to alarms and communication.

This is not an exhaustive list – there may be many other reasons specific to the pool or type of lesson.

The following table indicates guidance ratios for swimming/coaching sessions where a teacher/ coach who holds a relevant pool lifeguard/rescue qualification, meets safe supervision requirements and is teaching from poolside.

In the event that the teacher/coach does not hold a relevant pool lifeguard/rescue qualification, or teaches in the water, it is strongly recommended that a lifeguard is present at all times.

Lifeguarding requirements will be subject to the site's risk assessment.

Please check directly with your insurance provider to see if there are any stipulations for lifeguard cover or teachers/coaches pool lifeguard/rescue qualifications and ratios etc. in the terms and conditions of your insurance package.

Activity	Participant:instructor ratio	Comments/considerations
Adult and child class (where adults are in the water with a child on a one-to-one basis).	12 child and adult pairs:1 teacher	<ul> <li>Pool temperatures are critical for young infants.</li> <li>Pool depth to be suitable for the adult – comfortable standing depth or shallower.</li> <li>Considerations for twins – 1 adult: 2 children permitted, subject to risk assessment. One child must be in fixed floatation equipment such as discs, belts or a floatation vest.</li> <li>The swimming teacher may provide safety cover from in the water where there is direct adult supervision in the water for each child, provided the teacher can see all participants.</li> </ul>
Pre-school children (aged 3 to 4 years' old)	6:1	<ul> <li>Depth, layout and size of pool.</li> <li>Ability of participants and SEND.</li> <li>Provision of floatation equipment.</li> <li>Provision of additional helpers/Level 1 Swimming Assistant.</li> <li>Teacher in or out of the water.</li> </ul>

Beginners (children over 4 years and including adult participants).	12:1	<ul> <li>Participants with or without floatation equipment who cannot swim 10 metres comfortably and safely using a recognised stroke.</li> <li>Depth, layout and size of pool.</li> <li>Ability of participants and SEND.</li> <li>Provision of equipment.</li> <li>Provision of additional helpers/Level 1 Swimming Assistant.</li> </ul>
Improving swimmers (children and adults).	20:1	<ul> <li>Participants who have the ability to swim 10 metres comfortably and safely using a recognised stroke.</li> <li>Depth, layout and size of pool.</li> <li>Ability of participants and SEND.</li> <li>Provision of equipment - activity taking place.</li> </ul>
Mixed ability groups, not including beginners (children and adults).	20:1	<ul> <li>Should not include beginners and all should be able to swim a minimum of 25 metres.</li> <li>Mixed ability groups are often a necessity for school swimming lessons.</li> </ul>
Competitive club swimmers.	30:1	<ul> <li>The number of participants should fit the lane/area.</li> <li>The ratio should reflect the swimming competence of the participants and the activity taking place.</li> <li>Consideration needs to be made for the size of the pool ensuring that the whole designated area can be suitably supervised.</li> <li>More information can be found in HSG 179: Health and Safety in Swimming Pools.</li> </ul>

Diving tuition from poolside (children and adults).	20:1	<ul> <li>All dives from the poolside should be taught into a minimum depth of 1.8 metres with 7.6 metres forward clearance. The exception to this is where a qualified coach/teacher is delivering training on the Swim England Competitive Start Award or as part of a competitive club session.</li> <li>Recommended reading: Diving and Jumping in Swimming Pools and Open Water Areas.</li> <li>Deep water spinal rescue and recovery training.</li> <li>Consideration to be made to the swimming ability and skills level of participants.</li> </ul>
Platform diving training (children and adults).	10:1	<ul> <li>Only one diver should be on a board at any one time.</li> <li>Expansive diving facility configuration with safe spaces between the plunges may allow the ratio to increase.</li> <li>Deep water spinal rescue and recovery training.</li> <li>Consideration to be made to the swimming ability and skills level of participants.</li> </ul>
Artistic swimming (children and adults).	20:1	<ul> <li>Some artistic swimming exercises should not be taught in shallow water in case of impact with the pool floor.</li> <li>A risk assessment should consider the depth of the water needed for the exercise in relation to the height of the participants.</li> <li>Spread of participants across the pool.</li> <li>Use of equipment in the pool which has to potential to cause entanglement.</li> <li>Consideration to be made to the swimming ability and skills level of participants.</li> </ul>

Water polo (children and adults).	30:1	<ul> <li>Water space would normally preclude larger groups.</li> <li>Additional water polo players out of the water may allow the ratio to increase in a training session.</li> <li>If small groups are undertaking different activities within areas of the pool, additional supervision would be required.</li> <li>Consideration to be made to the swimming ability and skills level of participants.</li> </ul>
Exercise in shallow water (adults).	30:1	<ul> <li>Participants must be able to stand up from floating in the water on their front or back.</li> <li>Age and mobility of participants including medical conditions.</li> </ul>
Exercise in deep water (adults).	20:1	<ul> <li>Unlike exercise in shallow water, consideration must be given to participants' swimming ability and the use of floatation equipment.</li> <li>Age and mobility of participants, including medical conditions.</li> </ul>
Participants with special educational needs and/or disabilities – SEND (children and adults). Participants with long term health conditions or impairments.	To be considered on a case-by-case basis but not to exceed any of the above ratios.	<ul> <li>Each situation must be considered independently as people with SEND are not a homogenous group.</li> <li>Carers/helpers and in-water support should be considered depending on the requirements of the participant.</li> </ul>

The following table outlines the ability of participants in relation to common award frameworks.

Governing Body	Beginners	Improvers
Swim England	Up to and including Stage 3 of the Swim England Learn to Swim Programme.	Stages 4–10 of the Swim England Learn to Swim Programme, including the aquatic disciplines – swimming, diving, water polo and artistic swimming - and RLSS Rookie Lifeguard awards.
Scottish Swimming	Up to and including Swim Skills 2 of Scottish Swimming's Learn to Swim Framework.	Working through Swim Skills 3, 4 and Club Ready (Swim/Water Polo/Artistic Swimming/Diving) of Scottish Swimming's Learn to Swim Framework.
Swim Wales	Up to and including Wave 3 of the Learn to Swim Wales Framework.	Waves 4-8 and Skills 1-5 of the Learn to Swim Wales framework; including the aquatic disciplines – advanced swimming, diving, water polo and artistic swimming – and RLSS Rookie Lifeguard awards.
Swim Ireland	Swim Ireland Pre-School and Junior Aquatics Academy.	Swim Ireland Senior Aquatics Academy.
STA	Up to and including Goldfish 3 of the STA's International Learn to Swim Programme.	Goldfish 4 – Platinum of the STA's International Learn to Swim Programme including the additional aquatic programmes.

A guide to Safe Supervision of Programmed Swimming Lessons and Training Sessions is produced and endorsed by Swim England, Scottish Swimming, Swim Wales, Swim Ireland, the Chartered Institute for the Management of Sport and Physical Activity (CIMSPA), The Royal Life Saving Society UK (RLSS), the Institute of Swimming (IoS), the Association for Physical Education (AfPE), The Royal Society for the Prevention of Accidents (RoSPA) and the Swimming Teachers' Association (STA).



















