



CIMSPA GUIDANCE NOTE: GN014

Parental and operator guidance for child supervision policies in swimming pools

ABSTRACT

Practical advice for parents and operators for the adoption of a common sense approach to the development of measures and policies to support the safe supervision of children in swimming pools

JULY 2014

CIMSPA
CHARTERED INSTITUTE FOR THE MANAGEMENT
OF SPORT AND PHYSICAL ACTIVITY

Parental and operator guidance for child supervision policies in swimming pools

Contents	PAGE
1. Introduction	3
• Definition of terms	4
2. The context	5
3. Parent and lifeguard responsibilities	6
4. Key issues to consider when conducting a child admission risk assessment.	7
5. CIMSPA guidance for operators	8
6. CIMSPA guidance for parents	10
7. Further reading.	12

Acknowledgements

CIMSPA would like to thank the members of the working group for their input into the production of this document and the wider group of consultees for their contribution.

© CIMSPA 2014 PUBLISHED BY:

Chartered Institute for the Management of Sport and Physical Activity

Tel: 01509 226474 Fax: 01509 226475 info@cimspa.co.uk www.cimspa.co.uk

SportPark Loughborough University, 3 Oakwood Drive, Loughborough, Leicestershire LE11 3QF

Incorporated by Royal Charter Charity Registration No. 1144545

CIMSPA
CHARTERED INSTITUTE FOR THE MANAGEMENT
OF SPORT AND PHYSICAL ACTIVITY

1. Introduction

- 1.1 In September 2005, the Institute of Sport and Recreation Management (ISRM) published its *Risk Assessment Guidance for Child Admission Policies* that has since been used as a guide for operators to determine their own policies for the admission of children to supervised swimming pools.
- 1.2 In early 2013, the successor to the ISRM, the Chartered Institute for the Management of Sport and Physical Activity (CIMSPA), resolved to review the original guidance and established a working group to undertake this work. The group comprised representatives from a broad range of operators and other interested parties and was further enhanced by the establishment of a larger group of individuals that represented a wider cross-section of the industry to act as consultees.
- 1.3 The group, in coming to its final recommendations, considered all elements relative to the issues of child supervision guidance including parental responsibility, historical statistics relating to safety in swimming pools and current approaches adopted by operators. It also took careful consideration of the current guidelines, their impact on operators in their implementation, parental understanding, the desire to encourage young people to swim and the variety of policies presently adopted by operators.
- 1.4 The approved final document aims to provide a simple and common sense guidance and framework against which operators can conduct their own risk assessments when coming to a decision about the policies they wish to adopt. However, it has been necessary to ensure operators are aware of all the relevant issues when formulating their own policies.
- 1.5 It is hoped the revised guidance will also give parents a clearer understanding of their own responsibilities in ensuring their children can enjoy the benefits of swimming in safety.

Definition of terms

“Parent”

For the purposes of this document, the term ‘parent’ also includes guardians and other responsible adults in relation to their obligations for the safe supervision of children in swimming pools.

“Approved floatation devices”

Approved floatation devices are those that comply with *BSN 13138 part 1 - Buoyant Aids for Swimming Instruction*. This standard lays down the various tests that any floatation device must pass before it is approved including buoyancy and strength. It warns that armbands should be worn under competent supervision and should be worn on the upper arm only. Approved armbands are endorsed with the standard EN 13138-1:2003 or later and marked ‘CE’. (Operators may wish to elaborate on what constitutes an approved floatation device as part of any local information/educational campaign.)

“Designated safe area”

A designated safe area (DSA) is an area where there is still an inherent danger of drowning but it is reduced by the design of the area. It may be a shallow water pool, a teaching pool, a traditional pool with a clearly segregated DSA etc. The design criteria for non-swimmer areas are set out in *BSEN15288-1: 2008, Swimming Pools, paragraph 5.6.3.1*, which defines non-swimmer areas as equal to or less than 1.35 metres, no abrupt changes in depths and a floor gradient equal to or less than 10%. Such an area should also have:

- 4.2.1 *a suitable and sufficient defined area of shallow water*
- 4.2.2 *restricted access to any deep water*
- 4.2.3 *no moving water features*

Programmed sessions

Programmed sessions are swimming sessions with a formal structure which are supervised or controlled and continuously monitored from poolside such as tuition, club training and lane fitness swimming. The more disciplined nature of such activities, with the presence of group or club organisers, may make it possible to reduce the number of lifeguards, particularly where the group or club has exclusive use of the pool.

Unprogrammed sessions

are all other sessions that are not programmed as outlined above and include swimming sessions without a formal structure, where bathers are able to play within the confines of the rules laid down by the pool operator.

2. The context

- 2.1 Swimming is not just a fun activity; it can also be a beneficial form of exercise, a great sport and a life saver. For these reasons it is essential that children are encouraged to swim as regularly as possible. However, there are inherent dangers with water to which both parents and operators must give due consideration.
- 2.2 The Health and Safety Executive's publication *HSG 179 (2003) Managing Health and Safety in Swimming Pools* paragraph 205 states:
- "Pool operators will need to consider the number of children (under the age of eight years) allowed into a pool, during unprogrammed sessions under the supervision of one parent or adult. The decision on whether or not to admit adults with parties of children should be made having followed the principles of risk assessment, taking into account the physical attributes of the pool, the pool environment, staffing levels, and where possible, the swimming capabilities of the children."*
- 2.3 Pool operators must put into place measures that will maintain a high level of safety within their establishments. They should do this without introducing unreasonable or unnecessary measures that, at best, may deter parents from bringing or sending their children to a swimming pool, or at worst, drive them to unsupervised open waters where the element of danger is far greater.
- 2.4 Notwithstanding the general guidance offered in this document, operators when undertaking their own risk assessments must take into account (either generally or relating to particular activities such as parties, inflatable sessions etc.) the following considerations:
- the physical environment
 - the activities being undertaken
 - the participants – age, maturity and swimming ability
 - any equipment in use
- 2.5 Any policy, once adopted, should be kept under regular review, particularly at times of specific change such as alterations to staffing levels, new activities or alterations to the pool and changing room environment. Specifically, in relation to the above, consideration should be given to the following:
- 2.5.1 The design and layout of the pool in terms of shape, size, water depth and features (wave machines, diving boards etc.) within the pool should be taking into account as part of the risk assessment process in determining safe levels of supervision.
- 2.5.2 The different types of activities taking place in a pool – parent and toddler sessions, club sessions, parties, fun sessions etc. – all of which will need to be considered individually as part of the risk assessment process.
- 2.5.3 Given the wide age range (under 8s¹) that these guidelines cover, operators should consider any specific issues relating to such matters as the age of the children, height, maturity etc. when determining their overall and specific policies relating to particular events and activities.
- 2.5.4 Any equipment such as inflatables, wave machines, water slides, fast river rides, floats and swimming aids that might have a bearing on the conclusions reached for the safe supervision of children.
- 2.5.5 The design and layout of the changing facilities and the ease of access to the swimming pool from the changing facilities.

1 "Under 8s" has been retained as the age that these guidelines cover in parallel with HSG 179 guidance and in recognition that this is the age that children move into junior education.

3. Parent and lifeguard responsibilities

- 3.1 The role of the lifeguard is to support the parent in ensuring the safety of those under their supervision. *HSG 179 Managing Health and Safety in Swimming Pools* gives guidance on the number of lifeguards required to safely supervise a variety of different types of pools. Operators should consider the advice within this guidance when completing their specific swimming pool risk assessment.
- 3.2 Parents have a specific responsibility for the safety of their own children. This cannot be abdicated to lifeguards who are responsible for the safety of all swimmers. The key functions of a lifeguard are outlined in HSG 179 paragraph 143. Their primary role is to pre-empt dangerous situations from arising but they must also be suitably trained and qualified to effect a rescue and administer first aid if required. The adopted under 8s admission policy of the facility will be part of a number of management actions that will be in place to prevent accidents.
- 3.3 It is essential that parents are educated and are aware of their responsibilities with regards to the supervision of children while using swimming pools. There should be coordinated national and local programmes to provide information about, and raise awareness of, child supervision in swimming pools. The operator is responsible for ensuring, as far as practically possible, that parents are made aware of their responsibilities and of the child supervision and/or under 8s admission policy adopted by the facility. Operators should consider the needs of potential users whose first language is not English when producing awareness programmes and relevant documentation².
- 3.4 Lifeguards and other relevant staff such as receptionists, duty managers etc. must be appropriately trained so they are fully aware of the policies adopted and their implementation. Operators should place particular emphasis in any lifeguard training of appropriate methods of communication with swimmers while on poolside duty to ensure a high level of customer care without compromising the safety of the users of the pool

² The level and type of advice provided needs to be considered against a background of effectiveness and reasonableness. Operators should adopt approaches that best suits local needs.

4. Key issues to consider when conducting a child admission risk assessment

4.1 Design, layout and type of pool

Pools vary in size, shape and depth. Some pools are part of a complex of pools with shallow water pools either segregated from or adjacent to deep water. Additional features might include:

- Moving water (waves, geysers and rapid rivers)
- Physical hazards such as high freeboards (for wave pools), sudden changes in pool depth or hidden areas.

All of these must be considered when conducting a risk assessment to determine parent to children ratios.

4.2 Designated safe area

Where operators wish to introduce some flexibility in parent/child supervision ratios, it may be possible to define a designated safe area and amend ratios accordingly. However, ratios should never be greater than 1:3.

4.3 Types of session and activity

Operators are increasingly programming different sessions to attract different user groups to the pool. This can include family sessions, parent and toddler sessions, lane swimming, inflatable sessions etc. The level of risk will vary with the degree of excitement, interruptions to lifeguard sight lines, water movement, access to shallow water and the numbers attending the session. Different sessions may therefore require different levels of control.

4.4 Age and maturity of the children

Under 8s covers a wide range of abilities, maturity and heights. These issues must be considered in relation to the environment and the sessions in which the children are engaged.

4.5 Swimming ability

Operators can introduce their own competency testing process. Other ways of evidencing sufficient competencies could be through the achievement of a standard in excess of the minimum set by the National Curriculum Key Stage 2 requirements and/or the ASA Learn to Swim Framework Phase 7 or equivalent.

4.6 Floatation devices

If children wear approved floatation devices compliant with *BSNE 13138 part 1 - Buoyant Aids for Swimming Instruction*, safety is enhanced, risk factors reduced and operators can reflect this in their policy on parent/child ratios. Operators are advised to only supply and allow the use of, as far as practically possible, approved floatation devices compliant with the aforementioned standard.

5. CIMSPA guidance for operators

The following guidance outlines recommendations for pool operators to consider when undertaking risk assessments and drafting child admission policies. It is essential that operators undertake a full risk assessment taking in all relevant issues specific to that pool including layout, features, lifeguard numbers and the type of session taking place as referenced in 2.6 of this guidance.

Policies adopted should be fully transparent, understood by all who are affected and reviewed on a regular basis. Operators ultimately have responsibilities for all of their users under the Health and Safety at Work Act 1974 section 3 and a duty of care under the Occupiers Liability Acts. They must therefore take informed and appropriate decisions as part of the risk assessment process and during operational activity.

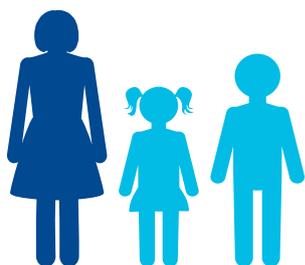
Specific guidance is as follows:

1. All children under the age of eight should always be accompanied in the water and changing areas during unprogrammed swimming sessions by a parent. Such sessions are those that are open for public recreational swimming as opposed to those under the direct control or instruction of a group organiser or class teacher/coach.
2. A parent for the purposes of this guidance is defined as someone over the age of sixteen or younger if the person is the biological parent of the child or children. The parent must be in the water with the children. They must maintain a constant watch over them and be in close contact with those of the children who are weak or non-swimmers. Parents who are supervising children must themselves determine that they have the required competencies to undertake this task.
3. In determining the number of children one parent can supervise, operators should consider all relevant issues outlined above.
 - As a starting point, the ratio of parent supervision for all children under eight should be 1:2.
 - This ratio could be increased, subject to the pool and its features (teaching pool, shallow water pools, use of approved swimming aids etc.), but should never be more than 1:3.
 - Circumstances (the presence of flumes, wave machines, inflatables, water slides, fast river rides etc.) may require a 1:1 ratio.

The following guidance will help to determine when it might be appropriate to amend the ratios:

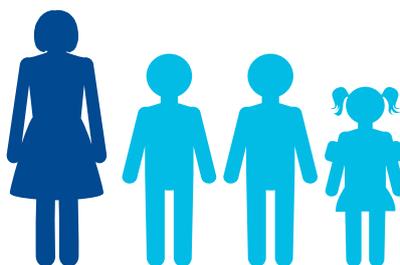
- 3.1 The criteria for increasing supervision ratios to 1:3 cannot be exhaustively specified here and should be undertaken with caution. Operators must undertake their own risk assessment but the following minimum criteria should be in place:
 - 3.1.1 The activity takes place in a designated safe area.
 - 3.1.2 Approved floatation devices are worn by weak and non-swimmers.
 - 3.1.3 Any child not in an approved floatation device shall either be a babe in arms or a competent swimmer as defined in 4.5.

-
- 3.2 The criteria for decreasing supervision ratios to 1:1 cannot be exhaustively specified here. Operators must undertake their own assessment but the following outlines the specific circumstances where a 1:1 ratio are advisable:
 - 3.2.1 The parent is unable to maintain a constant watch and/or be in close contact with more than one of the children.
 - 3.2.2 A busy pool environment with a number of features or other factors determined by the pool operator (e.g. wave machine, waterslides, multi-pool layouts), where there is a realistic risk of the party being separated and as a result of which parents cannot maintain close supervision.
 4. Operators should also consider that children over the age of eight, particularly those who cannot swim or are weak swimmers, may also require supervision at the same ratio. Relevant training should be provided for lifeguards to spot and assess these potential occurrences.
 5. Lifeguards and other relevant staff such as receptionists, duty managers etc. should be appropriately trained so they are fully aware of the policies adopted and their implementation.
 6. A parent of either gender accompanying children under the age of eight to a pool should be allowed to take those children into the changing room allocated to the parent's gender, irrespective of the gender of the children under eight. It is reasonable to assume that a child deemed too young to swim unaccompanied is also too young to look after him or herself in a changing room or to change unaccompanied.



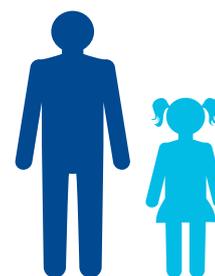
STARTING POINT: PARENT SUPERVISION RATIO FOR CHILDREN UNDER EIGHT SHOULD BE 1:2

1:2



THIS RATIO COULD BE INCREASED (e.g. BY USE OF APPROVED SWIMMING AIDS)

1:3



OR, CIRCUMSTANCES (e.g. WAVE MACHINES) COULD REDUCE IT

1:1

6. CIMSPA guidance for parents

The following guidance outlines recommendations for parents when using swimming pools with children. Operators of swimming pools, following similar guidance, will have produced rules to ensure the safety of all users. Compliance with these rules is of paramount importance to ensure everyone can use the facilities safely.

Please ask for a copy of the rules from the pool you wish to swim at so you can ensure you understand and comply with the operator's requirements.

1. All children under the age of eight should always be accompanied in the water and changing rooms during public swimming sessions by a parent. Such sessions are those that are open for public recreational swimming as opposed to those under the direct control or instruction of a group organiser or class teacher/coach where different rules may apply.
2. A parent is defined as someone over the age of sixteen or younger if the person is the biological parent of the child or children. The parent must be in the water with the children. They must maintain a constant watch over them and be in close contact with those of the children who are weak or non-swimmers. Parents who are supervising children must themselves determine that they have the required competencies to undertake this task.
3. Parents should be aware that operators, when looking at their own facilities and considering the guidance offered, will implement rules they feel best suits their individual circumstances. Parents would be advised, therefore, to make appropriate inquiries if the pool isn't one they are familiar with.
 - As a starting point, the ratio of parent supervision for all children under eight should be 1:2.
 - This ratio may be increased subject to the pool and its features (teaching pool, shallow water pools, use of approved swimming aids etc.), but should never be more than 1:3.
 - Circumstances (flumes, wave machines, inflatables etc.) may even require a 1:1 ratio.

The operator will consider a multitude of factors for increasing ratios including the following:

- 3.1 The activity takes place in a designated safe area e.g. shallow pool, teaching pool, roped off shallow area of a standard pool etc.
- 3.2 Approved floatation devices are worn by weak and non-swimmers.
- 3.3 Any child not in an approved floatation device shall either be a babe in arms or who can demonstrate a standard of swimming ability in excess of the minimum set by the National Curriculum Key Stage 2 requirements and/or the ASA Learn to Swim Framework Phase 7 or equivalent.

Similarly, factors that might be taken into account when deciding to decrease the ratio of parent/child supervision to 1:1 include:

- 3.4 The parent is unable to maintain a constant watch and/or be in close contact with more than one of the children.
 - 3.5 A busy pool environment with a number of features or other factors determined by the pool operator (e.g. wave machine, waterslides, multi-pool layouts), where there is a realistic risk of the party being separated and as a result of which parents cannot maintain close supervision.
4. Parents should also be aware that children over the age of eight, particularly those who cannot swim or are weak swimmers, may also require supervision of a similar level. Those responsible for the children must therefore consider the swimming abilities of all children and the appropriate supervision required, and heed the advice/instruction of the swimming pool staff.
 5. Parents accompanying children to a pool should be able to take under eights into an 'opposite sex' changing room or alternative facilities should be provided. It is reasonable to assume that a child deemed too young to swim unaccompanied is also too young to look after him or herself in a changing room or to change unaccompanied.
 6. Parents are advised to use only approved floatation devices compliant with *BSN 13138 parts 1-3 – Buoyant Aids for Swimming Instruction* as confirmed by the CEN mark.

7. Further reading

1. *HSG 179 Managing Health and Safety in Swimming Pools* – Health and Safety Executive
2. *BS EN 15288-2:2008 Swimming Pools Safety Requirements for Operation* – British Standards Institute
3. *BS EN 13138-1:2008 Buoyant Aids for Swimming Instruction Safety* – British Standards Institute