



Defence
Children
Services

DCS Directive 3.2.20

Water Safety for MOD Schools and Settings

DCS Sep 19 v1.0

General

Authorisation	Director DCS
Senior Responsible Owner	Chief Education Officer MOD Schools
Point of Contact	SO1 Policy/DCYP-DCYP-MAILBOX@mod.gov.uk 01980 61 8838 Safety, Health, Environment Advisor 01980 61 8796
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Related Policy/Guidance	Health and Safety Executive. HSG179:Health and Safety in Swimming Pools (2018) 2013DIN06-019:Safety in Swimming Pools Operated by the Armed Forces. DCS Directive 3.2.11: Outdoor Learning and Visits Education Scotland. Scottish Swimming Development Plan 2015-2021. Association for Physical Education(afPE). Safe Practice in Physical Education and School Sport.
Annex A	Normal Operating Procedures
Annex B	Emergency Action Plan
Annex C	Risk Assessment

Introduction

1. Schools in Great Britain must maintain school level policy that directs statutory curriculum requirements for swimming and water safety. DCS, mirrors this requirement overseas where reasonably practicable The Queen Victoria School (QVS) complies with statutory guidance for Scotland and may use this DCS policy where it is complementary.

Principles

2. All Defence managed swimming pools, wherever situated, are required to comply with [2013DIN06-019: Safety in Swimming Pools Operated by the Armed Forces](#) which references the Health and Safety Executive publication “Managing Health and Safety in Swimming Pools” ([HSG 179](#)). It is a Commanding Officer/Commander/Head of

Establishment^[1] responsibility to implement this under legal Duty of Care obligations. Likewise, it is a Duty of Care responsibility to manage all swimming pool activities to As Low As is Reasonably Practicable (ALARP). It is expected that swimming pool operators will therefore be responsible for safety, have sufficient trained staff and hold suitable public liability insurance, or self-insure where the operator is the MOD.

3. Where water-based activities are arranged/delivered by DCS personnel in pools managed by Defence, they must do so in accordance with the policy contained in 2013DIN06-019 and use this DCS Directive as complementary direction.

4. All water-based activities that are arranged/delivered by DCS personnel overseas in pools not managed by Defence (local public pools/private pools/outdoor swimming) are to be conducted in accordance with this DCS Directive and following the principles laid out 2013DIN06-019 and in HSG 179: Health and Safety in Swimming Pools.

Aim

5. This DCS Directive aims to provide direction and guidance that compliments both Defence policy, Statutory guidance (England/Wales) and professional standards for the safe practice of water-based activities required by the regular and/or supporting education curriculum delivered by MOD schools/settings overseas.

Scope

6. This Directive applies to all water-based activities arranged/delivered by DCS personnel overseas that are required by the regular or supporting education curriculum (0-18) and includes:

- a. Swimming required by the physical education curriculum;
- b. Educational visits (inclusive of residential);
- c. Outdoor learning;

7. The Directive only applies to DCS personnel employed in MOD schools and settings.

8. QVS follows Scottish National direction and guidance for water safety and this Directive where complimentary.

Responsibilities

9. HQ DCS (MOD Schools) is responsible for:

- a. Promoting the inclusion and development of swimming in the school curriculum;
- b. Monitoring and supporting the achievement of 25m swimming target for pupils by the end of key stage 2;

[1] Not all Heads of Establishments are COs and not all COs are Heads of Establishment therefore whoever has the responsibility for the pool has the legal Duty of Care obligation to implement "Managing Health and Safety in Swimming Pools" ()

- c. Providing advice to schools/settings in locations where there are no suitable swimming facilities;
 - d. Ensuring that DCS personnel are appropriately DBS cleared, trained and skilled in accordance with the duties laid out in this Directive;
 - e. Ensuring that MOD schools/settings have appropriate insurance;
10. MOD setting managers are responsible for applying the direction laid out in this Directive, inclusive of compliance with Defence policy, to any arrangement/delivery of water-based activity for children in early years/childcare.
11. MOD schools are responsible for:
- a. Supporting the provision of swimming instruction either in key stage 1 or key stage 2. Specifically, pupils should be taught to:
 - (1) Swim competently, confidently and proficiently over a distance of at least 25 metres by the end of key stage 2 (KS);
 - (2) Perform safe self-rescue in different water-based situations.
 - b. Supporting pupils who do not meet this requirement through 'top up' at the end of KS2 or 'catch up' on their transfer to secondary school.
 - c. Publishing details of provision or non-provision in the school prospectus.
12. Head teachers are responsible for:
- a. Ensuring that the provision for swimming is made within the curriculum;
 - b. Ensuring that the school meets the 25m swimming target for pupils by the end of key stage 2 or later for those who do not meet the target during key stages 1 and 2;
 - c. Ensuring that a member of teaching staff is delegated as swimming co-ordinator and is appropriately trained;
 - d. Ensuring that school swimming activities are appropriately supervised and safeguarded;
 - e. Ensuring that all adults working with children are DBS cleared and suitably qualified and experienced to deliver or support swimming lessons;
 - f. Where necessary, recruiting a swimming instructor/teacher;
 - g. Ensuring that school staff and volunteers are DBS cleared;
 - h. Ensuring all relevant and up to date medical and health information is maintained and provided to swimming instructors;
 - i. Ensuring that the school has appropriate insurance;
 - j. Ensuring that school swimming policy and procedures are maintained;

- k. Ensuring that the Normal Operating Procedures and Emergency Action Plan are reviewed and update appropriately on an annual basis.
13. Swimming co-ordinator is responsible for ensuring that:
- a. all school staff and volunteers involved with swimming and water-based activities are aware of, and follow, DCS and MOD school level policy and procedures;
 - b. school staff and volunteers are appropriately trained or briefed as required by safety and safeguarding;
 - c. any necessary risk assessments are undertaken;
 - d. establishing a system for recording and monitoring children's progress in swimming, including the 25m target at key stage 2, and identifying which pupils may need "top up" teaching.
14. Teacher in Charge is responsible for:
- a. Overall responsibility for the swimming group;
 - b. Delegating responsibilities appropriately;
 - c. Ensuring that responsibilities are enacted as below:
 - (1) A head count is taken before, during and after sessions and that this is recorded in the swimming registers;
 - (2) Children are appropriately supervised when changing;
 - (3) Children are under control at all times;
 - (4) The Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) are enforced; all staff on poolside should be aware of the emergency procedures of any external provision, ensuring that children are aware of what to do in the event of an emergency;
 - (5) Recording and maintaining records of the qualifications of those involved in teaching swimming.
15. Accompanying School Staff are responsible for ensuring that:
- a. Responsibilities are enacted as above.
16. School Teachers are to:
- a. have an overview of the teaching of their children and the conduct of their class;
 - b. monitor progress of their pupils;
 - c. be aware of special needs or medical conditions of the pupils they teach so that correct measures/precautions can be put in place;

- d. accompany their own classes to swimming lessons whenever possible and remain poolside to provide an assisting role to swimming.
17. Adults other than teachers (AOTTs), suitably cleared (Disclosure and Barring Service), qualified and experienced, can support the provision of school swimming as below:
- a. Support and work alongside teachers;
 - b. Supervise changing;
 - c. Administer first aid if appropriately trained¹;
 - d. Supervise unwell children or children who are not swimming.
18. Swimming Instructor (Qualified as a minimum to Amateur Swimming Association (ASA) UKCC Level 2 or Swimming Teachers Association (STA) equivalent) needs to:
- a. Work in partnership with the Teacher in Charge and other school staff accompanying children swimming;
 - b. Ensure a suitable and sufficient risk assessment is undertaken for each group involved in swimming;
 - c. Be aware of medical, behavioural and special needs of the children and risk assess these in the context of the swimming environment;
 - d. Ensure safe conduct of the class whilst children are in water and on poolside;
 - e. Enable children to have fun in and near water;
 - f. Prepare schemes of work appropriate to the pupils' age and ability and with reference to the National Curriculum requirements;
 - g. Ensure appropriate numbers of fully qualified and DBS cleared lifeguards, as outlined in Table 1, are on poolside. Shallow tank school pools will require at least 2 members of school staff qualified in, as a minimum, the Shallow Tank Rescue Course.
19. Lifeguards are to be poolside whenever children swim and must:
- a. Conduct risk assessments on pool and poolside;
 - b. Maintain constant observation of the pool and pool users;
 - c. Carry out rescues and initiate emergency action as required;
 - d. Effect a rescue from the bottom of the deepest part of the pool as required;
 - e. Administer first aid;
 - f. Prevent unsafe activities;

¹ Health and Safety Executive (HSE) compliant First Aid at Work training.

- g. Ensure that the pool is never left unsupervised whilst in use and secure the pool against unauthorised access when not in use;
- h. Assist in the running of emergency drills;
- i. Communicate with children and teaching staff to achieve the above.

20. Pool Supervisors are responsible for overseeing the use of the pool during swimming activity.

21. Where a teacher, AOTT or swimming instructor is also the sole lifesaver, an additional competent adult must be present at all times. Where the head teacher cannot guarantee that lifeguarding requirements set out in this policy can be met through existing staff, the school must provide additional qualified lifeguards to ensure the safety of the group.

22. Instructors and lifeguards should have whistles and brief pool users on the proper response when the whistle is blown.

2. Safe Procedures

Position of the Swimming Instructor

23. The Swimming Instructor should be teaching from the side of the pool where the whole group can be seen and from where feedback can be given on the performance of each pupil in the group.
24. When teaching or instructing non - swimmers or weak swimmers in underwater swimming or activity the Swimming Instructor should be positioned on poolside at the point nearest to that activity, but so that they can also see the rest of the class.
25. There may be some circumstances in which it is appropriate for a teacher or a classroom assistant to be in the water supporting individual children, (as an additional person). This should be the exception rather than the rule and only following a careful risk assessment, by the Swimming Instructor, of all the potential factors involved (depth of water, pupil ability, and use of flotation aids, size of pool, number and age of pupils, life guarding arrangements).
26. When an additional person is in the water assisting, they must be aware of the NOP and EAP.
27. The teacher in charge of a group must ensure that at all times they can see all the pupils and NEVER turn their back on a group or position themselves so that pupils are behind them.
28. Care needs to be taken that there are not excessive numbers of adults on the poolside and that all staff accompanying the children swimming are alert and supportive to the Swimming Instructor.
29. **In an indoor pool.** If there is glare on the pool surface and the bottom of the pool cannot be clearly seen, swimming instructors should ensure that the window letting the light in is obscured and/or reposition themselves so that anything on the bottom of the pool can be seen.
30. **In an outdoor pool.** The instructor/lifeguard should position themselves so that anything on the bottom of the pool can be seen. Accompanying school staff, who are not involved in teaching swimming should be positioned so they are able to support the swimming instructor in the control of children but should not be in the way of those working on poolside. Their position must be specified in the NOP. Such staff will be in addition to the ASA Module 1 qualified members of accompanying school staff, working poolside with the children under the direct supervision of the Swimming Instructor.

Normal Operating Procedure (NOP)

31. All schools with their own pool will need to draw up the NOP for their pool. This is to be reviewed annually to ensure currency and relevancy. A model NOP is at Annex A.
32. School staff working in the pool must receive appropriate training on the NOP, this must be recorded, signed by the person delivering the induction and kept on file.

33. The NOP should include the School Rules which should be displayed and explained to all pupils prior to their first swimming lesson and regularly through the year.
34. The NOP should include direction on Diving, the use of goggles and can include direction on suitable attire.

Emergency Action Plan (EAP)

35. An EAP details roles and responsibilities in the event of a reasonably foreseeable emergency. All staff must receive an induction course on the EAP and this must be recorded by the school, signed by the person delivering the training and kept on file. A model EAP is at Annex B.
36. Schools with their own pools will need to draw up or review their own risk assessment as a basis for writing the emergency action plan for their pool. Schools using pools that are externally operated should liaise with the operating authority to draw up an EAP.
37. Notices need to be displayed to advise pool users of the arrangements in the event of an emergency.
38. All school classes should run practice drills during the first lesson of each term (and then regularly afterwards) in order that both staff and pupils recognise the alarm signal and know how to respond to it.
39. Exit doors and signs, fire-fighting equipment and alarm points need to be checked regularly to ensure that they are working and accessible. All fire doors must be operable without the aid of a key at all times the pool is in use. These should be checked at the start of every lesson.
40. Safety equipment such as poles, throwing ropes or throw bags, first aid provision and emergency alarms need to be sufficient in quantity, regularly checked and records kept and an initialled checklist on show by the alarm, this needs to be positioned so as to be readily available when needed without creating additional hazards to pool users.
41. All pools must be equipped with an alarm or alternative backup means of raising an alarm and summoning support in the event of an accident or incident. If the pool has no alarm, there should be a landline phone on poolside which is checked before each lesson. Mobile phones are only appropriate as a back-up and signals must be checked on arrival at poolside prior to the lesson.
42. A phone providing direct contact to emergency services should be available and made known to all staff.

Risk Assessment

43. Each pool and each session must be treated as unique for the purpose of assessing and mitigating for risk. The risk assessment forms the basis of every School's NOP and EAP and should follow the Health and Safety Executive (HSE) 5 Step process detailed at Annex C.

44. **Defence Managed Pools.** The school must provide the swimming instructor with a register, up to date medical information and any other relevant information about the children, one week before swimming takes place.

45. The completed register of children present should be updated and handed to the swimming instructor for them to check before each lesson.

46. Accompanying school staff are expected to undertake an overview of the risk assessment each time they attend the pool. Staff should take action to control any identified changes such as:

- a. Availability and condition of rescue/emergency equipment;
- b. The age and ability of the children in each class;
- c. The activities they will be undertaking;
- d. The qualifications of the people leading and supporting the session;
- e. Known medical conditions/support needs.

47. Pool depths are to be clearly marked on the walls of the pool and teachers/instructors are to explain their significance to pupils.

48. **Public Pools.** Schools will need to form a judgement on the safety and appropriateness of using public pools. The Teacher in Charge must conduct a risk assessment, arrange additional supervision or cover as required and be familiar with:

- a. Risk Assessments for the pool;
- b. The NOP;
- c. The EAP;
- d. Conditions of hire/hire agreement;
- e. Pool Rules (usually found in the NOP and displayed on poolside);
- f. Any special requirements or medical conditions of pupils.

49. **Private Pools (hotels, campsite, private homes).** The Teacher in Charge is to conduct a risk assessment; ascertain, where reasonably practicable, the suitability of lifeguarding provision and arrange additional supervision or cover as required. Swimming may only take place when either:

- a. The pool has its own lifeguard on duty or;
- b. The MOD school group is able to provide a suitably qualified and experienced lifeguard.

Open Water Swimming

50. For the purposes of this policy, “open water swimming” is defined as “swimming, paddling, in a river, canal, sea or lake”.

51. Involving young people in well organised and supervised swimming or paddling in open water can provide opportunities to develop their awareness of water safety, choice of swimming area and safe conduct while swimming. Such opportunities are important because the most effective way to reduce the risk of young people drowning is to teach them to swim, giving them the skills to make sound judgements about playing in and around open water.

52. Open inland water such as rivers, lakes, reservoirs or canals present additional risks to those of a swimming pool. These include human and animal borne biological hazards, vegetation and other under water obstructions, sudden changes in depth and pollution, slippery rocks and surfaces.

53. Swimming in the sea carries additional risks which may include low water temperature, strong winds, undertow and tide. For paddling in the sea (gentle, shallow water with no intention to swim) a thorough risk assessment **MUST** be undertaken which includes:

- a. A minimum of 2 staff and a ratio of 8:1 participants to staff;
- b. The ability to account for all participants at all times;
- c. A person qualified in at least Emergency Aid and competent to carry out CPR. This person may be included in the staffing ratio or be present as an additional person to carry out this responsibility;
- d. Thorough knowledge of conditions in and around the water;
- e. An agreed and restricted swimming/paddling area taking into account: age, weather and water conditions and safety provision;
- f. Emergency signals - visual and audible – and the need for a whistle and First Aid equipment.

54. Risks involved in any use of open water should be carefully assessed and should always be a robustly planned activity. It should never be allowed as an impromptu group activity.

55. Guidance must be sought from the Educational Visits Co-ordinator (EVC) prior to any visit that may include swimming in open water.

56. Open water swimming can only take place where:

- a. The Teacher in Charge has been approved as competent to supervise the session by the head teacher or the EVC;
- b. Parents must provide full parental consent;

- c. Swimming activities are robustly planned and organised;
- d. Supervision is undertaken by a suitably qualified and experienced leader who is appropriately competent in life saving, rescue and resuscitation procedures (who is able to deal with the worst-case scenario in the chosen environment).

57. **Managing the Activity.** The Teacher in charge must:

- a. Ascertain for themselves the level of the participants' swimming ability;
- b. Ensure the activity is suitable for the group, taking account of special needs or disabilities;
- c. Look out for warning signs and flags and understand what they mean. Flags will carry different meanings in different locations;
- d. Clearly designate the limits of the swimming area and brief the group accordingly;
- e. Adopt and explain signals of distress and recall;
- f. Carry out regular and frequent head counts;
- g. Have clear roles within the supervision plan – at least one supervisor should always stay out of the water for better surveillance, even where lifeguards are on duty;
- h. Take up a best position from which to exercise a constant vigilance;
- i. Divide supervision between staff who are in the water and looking landward towards the group, and staff who stay on land and watch the group from that vantage point;
- j. Give the participants their full, undivided attention;
- k. Be prepared to act immediately when a participant appears to be in difficulties. Be aware that a participant in difficulty may not wave or shout – all of their energies could be focussed on trying to keep afloat;
- l. Follow the advice or directions of an official lifeguard;
- m. Avoid swimming themselves - unless it is to help a person in distress;
- n. Avoid joining in with the group's water-based games;
- o. Ensure that participants leave the water if they are at risk of becoming too cold; especially if toes and fingers look blue or feel numb (this could suggest the onset of hypothermia);
- p. Be able to account for all group members at all times, including those who are not in the water. Only as many pupils as can be observed and counted are to be allowed in the water at any one time;
- q. Ensure that pupils never swim alone.

- r. Ensure that swimmers are aware of other water users;
- s. Ensure that diving only takes place from designated diving platforms.

Diving

58. Diving must only be taught by an appropriately qualified swimming instructor with a diving specific qualification. At no point, must anyone without this qualification be allowed to teach diving.

59. All schools must check whether their qualification covers them to deliver diving and refer to AfPE Safe Practice in Physical Education and Sport 2012 Edition, Section 5.2.46 for guidance on diving.

60. No diving shall be permitted in water less than 1.8m deep and/or with less than 7.6m forward clearance. However, the clearance will vary according to the height and the ability of the person undergoing instruction and therefore instructors should consider the clearance required taking this into account.

61. Only shallow entry dives should be permitted. Diving blocks and stages must conform to FINA/ASA regulations.

Goggles

62. Goggles may be worn by children who swim frequently or for long periods of time or whose eyes are susceptible to irritation. Requests to wear goggles should be made by parents and recorded by the swimming coordinator.

63. The Swimming Instructor for the group is responsible for determining whether any pupil wearing goggles is using them safely and for a positive purpose. If they are not, then the goggles should be removed. Children may be asked to remove their goggles for certain activities e.g. self-rescue, water polo.

64. Risk management should include ensuring that children know how to put on and take off goggles safely - by slipping them off the head rather than by stretching the retaining band.

65. Goggles must be manufactured and packaged to British Standard BS 5883:1996.

Medical Information

66. All relevant medical conditions are to be documented on each school's swimming register and Risk Assessment and each swimming instructor and accompanying school staff must be in possession of all medical information one week prior to that child swimming, in order that a suitable risk assessment can be undertaken.

67. Individual pupil information for specific medical conditions that will include but are not limited to asthma, epilepsy, visual and hearing impairment must be compiled and returned to the swimming instructor, along with registers, 1 week before commencement of the swimming programme.

68. If a child experiences a medical condition during a swimming lesson that was previously unknown to the swimming instructor, and/or school, this must be documented in writing by the school designated person. School staff should discuss the incident with the Parent/carer of the child and permission from them to continue with swimming lessons renewed. The incident should be discussed between the school designated person and the swimming instructor so that safe procedures can be put in place before the child participates in the next swimming lesson.

69. Inhalers, for those swimmers who require them, must be accessible at all times including poolside. It is the school's responsibility to ensure the inhaler is kept safely by the poolside and readily available. Any child coming to the pool without their inhaler will not be allowed to swim.

First Aid Arrangements

70. All schools should make or check the arrangements for First Aid for travel to, from and at the pool.

71. Emergency blankets should be available in a box and clearly labelled, this should reflect the maximum number of people who could occupy the pool. There must be a qualified First Aider, on site at all times when the pool is in use (In pools used by children under 8 a First Aider should be qualified in Paediatric First Aid).

72. Accidents/Incidents requiring first aid need to be recorded on an accident form/book. Schools hiring the pool must request a copy of the form for their own records.

73. Accidents/Incidents should be reported under the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013 (RIDDOR) where appropriate.

Teacher Pupil Ratios

74. Teacher Pupil ratios are to be defined through risk assessment and must be included in the School's NOP. Irrespective of the teacher pupil ratio, there must always be at least 2 members of school staff present on poolside during a swimming lesson.

75. The absolute upper limit for swimming instructor to pupil ratio is 20:1.

76. The safety ratios in Table 1 are taken from the Amateur Swimming Association Guidelines for UKCC Level 2 ASA (or equivalent) Swimming Teachers and should only be used for guidance when writing risk assessments. The NOP, EAP and other factors need to be taken into account when defining teacher: pupil ratios, including the competency and experience of the Swimming Instructor, Lifeguard provision (if the Instructor is also taking on the role of the Lifeguard), design of the pool and ability of the pupils.

Non-swimmers and beginners 12:1
Young children, normally primary school age or adults being introduced to swimming who are unable to swim 10m unaided on their front and back.
Children under the age of 7 12:1

Irrespective of their swimming ability, group size should be restricted.
Improving swimmers 20:1
Swimmers of a similar ability to each other who can swim at least 10m competently and unaided on their back and on their front. It is recommended that the lessons be confined to an area in which the children are not out of their depth
Mixed ability groups 20:1
Pupils with a range of ability (from improving to competent) where the least able and least confident are working well within their depth. Swimmers techniques, stamina and deep-water experience should be considered.
Competent swimmers 20:1
Those swimmers who can swim at least 25m competently and unaided on front and back and can tread water for 2 minutes.
Competitive swimmers 30:1
Training only with very competent swimmers.
Swimmers with disabilities – various
Each situation must be considered individually as people with disabilities are not a homogeneous group. Care must be taken to ensure that there are sufficient helpers in the water to provide 1:1 ratio for those needing constant support and a sufficient number of other helpers to provide the degree of support required by the range of disabilities within the group. Individual risk assessments must be undertaken so that the teacher in charge of swimmers with disabilities can be aware of the particular needs of each child

Table 1.

77. Where schools take more than 20 pupils swimming they will require:

- a. 2 ASA UKCC Level 2 Qualified Swimming Instructors (or equivalent) and 2 ASA Module 1 (or equivalent) school staff.

Qualifications

78. **The Swimming Instructor.** The minimum recommended qualification for the teaching of swimming is the ASA UKCC Level 2 or STA equivalent.

79. **Class Teacher/AOTT.** The minimum recommended qualification for a class teacher or AOTT is the ASA National Curriculum Training Programme Module 1.

80. **Lifeguard.** The minimum recommended qualification for lifeguarding a programmed activity is the RLSS National Rescue Award for Swimming Teachers and Coaches (NRASTC). Programmed activity is defined as:

- a. Within a formal structure;
- b. Disciplined;
- c. Supervised or controlled;
- d. Continuously monitored from poolside.

81. For un-programmed activities (free swimming) the minimum recommended qualification for lifeguarding is the National Pool Lifeguarding (NPLQ).

82. Where a swimming pool is in shared use and divided between programmed and un-programmed activities, suitably qualified and experienced teachers or AOTTs may take responsibility for lifeguarding and instruction within the programmed area of the pool only.

Swimmers with Disabilities

83. The Equality Act ensures that disabled persons may not be treated less well than any other person. Policies and procedures or physical changes to the environment may need to be put into place to ensure children with disabilities are able to learn to swim. However, there remains the caveat that justifiable actions for the protection of an individual's life or health and safety override the duty to include. Schools may have to consider the following:

- a. Pool accessibility (i.e. ramps, hoists and changing facilities);
- b. Increased Teacher: Pupil ratio;
- c. Assistant/helper in the water.

Child Protection

84. Child protection is assessed as a high-risk activity in respect of the protection of children from abuse because of the opportunity for close physical contact and the nature of swim wear.

85. For this reason, special attention must be given to rules and procedures to avoid abuse and the allegation of abuse. All persons working with children shall have a DBS and this should be shown with the hire agreement if these are not school staff.

86. It is important that the pool procedures relate to those defined in JSP 834, Safeguarding of Children and Young People.

87. A school using a pool, other than their own should establish a protocol identifying the relationship between their respective procedures.

88. When supervising children changing or assisting them with their swimming, pool and school staff and adults other than teachers should avoid physical contact with children unless it is:

- a. Essential to develop a swimming skill or technique;
- b. To treat an injury;

- c. To prevent an injury;
- d. To meet the requirement of the activity (e.g. Lifesaving);
- e. To lift or manually support a child with disabilities;
- f. To assist with a personal care task which the child or young person cannot undertake by themselves. In these circumstances the adult should explain the reason for the physical contact to the child. Unless the situation is an emergency the adult should ask the child for permission;
- g. If children have disabilities, they and their carers need to be involved in deciding what assistance should be offered and the child should be treated with dignity and respect;
- h. Always explain to the pupil that you are now going to hold him/her and why, to avoid embarrassment; Swimming instructors must never support pupils in such a way that their hands cannot be seen by the spectators;
- i. Never support a pupil by handling the swimmer's torso. Only support swimmers by holding their hands, head or feet;
- j. Teachers and instructors should NEVER teach or coach a swimmer alone;
- k. Where children sustain an injury and any First Aid is administered the parents/carers should be informed as soon as possible. Details should be recorded and retained by the school. Accidents and incidents which occur should also be recorded by pool staff on their forms for their records. In the event of a child needing to be taken to hospital for treatment, a representative from the school, known to the child, should always accompany the child. If this leaves the school group short of staff at the pool, then the school should be informed to seek additional staffing for the group. The parent/carer of the child should be informed as soon as possible. Staff and adults other than teachers should avoid placing themselves at risk by being alone with a child and should ensure that wherever possible there are other responsible persons around and that they are in public view.
- l. Parents/guardians should be informed of changing arrangements. It is the responsibility of the accompanying school staff to provide appropriate supervision whilst the children are changing. Only staff of the appropriate gender should enter the changing room, where possible, unless in an emergency. A mixed gender group may use an open plan, single sex changing area if the children are under the age of seven and with agreement from pool management. There should never be a situation where a member of staff is alone with a child. All the children should remain together in a group. In situations where this is not possible, two members of staff should remain together. Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise children and that children are safeguarded from members of the public.

Records

89. **Incidents and Accidents.** Records of incidents and accidents that occur in the swimming pool or pool area must be maintained and be available for inspection if required. An annual review of these records will assist with the review of the risks associated with school swimming

Insurance

90. **Curricula Swimming.** The MOD does not normally purchase insurance cover and will only accept liability for core business, therefore, only swimming activity that is delivered in accordance with policy laid out in 2013DIN06-019 and as part of a school's core curriculum (inclusive of the physical education curriculum) will fall under the MOD's liability.

91. Where MOD schools are hiring facilities for curriculum swimming they are to assure themselves that facilities have the appropriate third-party insurance. Where this is not in place, schools must arrange for appropriate insurance cover.

92. **Non-curricula Swimming.** Schools are advised that non-curricula swimming activity is not covered by MOD liability. Where such activities are funded by private individuals, the cost of insurance will need to be borne by the individual.

93. Non-curricula swimming should not be funded (wholly or in part) by MOD schools. In scenarios where schools arrange non-curricula swimming, they are to assure themselves that the facilities being used are covered by appropriate third-party insurance and where this is not in place, schools must ensure that the appropriate insurance cover at parental expense is arranged.

94. Claims will not normally be met for loss or damage to pupils' personal possessions.