Safe Practice in School Swimming Policy

This policy has been entirely adopted by SCPS from the OCC model policy.

OCC Latest version: September 2026

Version 2.1
Check of latest OCC version: September 2026
Date of ratification by governors: 07.10.26
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Reviewing the Policy

1.1 This policy will be reviewed annually by the Head teacher and monitored by the governing body. This policy is wholly adopted from the OCC model policy so the annual review will check that this policy contains the latest version issued by OCC.

1.2 If no changes are found the document will be reissued with the latest check date with no further approval needed.

1.3 If changes are found the document will go through the SCPS policy approval and ratification process.

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Safe Practice in School Swimming

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1. Purpose

This document outlines policies and guidance for safe school swimming and water safety at any pool or during school trips. It provides OCC's procedures, based on national guidelines from AfPE and Swim England, covering lessons, pool safety, and water-based activities on educational visits.

All schools with their own pools should have a copy of Health and safety in swimming pools - HSG179 (hse.gov.uk), downloadable from the HSE website.

All schools should hold a copy of the AFPE (Association for Physical Education) Safe Practice in Physical Education and School Sport, details further guidance on safety issues including swimming; can be obtained via the website.

The appendices contain supporting materials and further guidance.

2. Scope

The policy aims to provide a consistent framework for planning and delivering school swimming and water safety lessons, as outlined by the Department for Education (DfE) Physical education programmes of study. Schools are required to offer swimming instruction by the end of Key Stage Two.

Physical education, which includes swimming, is a National Curriculum Foundation Subject and is statutory. All schools must deliver swimming instruction during either Key Stage 1 or Key Stage 2. Pupils are expected to:

- swim a minimum of 25 meters competently, confidently, and proficiently
- demonstrate effective use of various strokes, such as front crawl, backstroke, and breaststroke
- perform safe self-rescue in different water-related situations

Swimming contributes to the development of physical literacy and skills related to health and recreation. It is considered a foundational skill that enables participation in other water-based activities. Swimming is accessible to individuals across age groups and can be practiced recreationally or competitively.

Swimming also involves risks, including drowning or serious injury resulting from near drowning. **It is essential that swimming and water safety instruction is conducted with appropriate care by all involved.**

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3. Responsibilities

The local authority (LA) is the employer of maintained controlled, voluntary controlled and community schools and has responsibility for health and safety. Governing bodies remain accountable for complying with the LA policies and procedures contained within them.

In academies, it is up to boards to decide whether and how to delegate the creation, maintenance and approval of policy documents within their trust. Academies can use LA health and safety information as guidance and, where available, a model policy. Boards remain accountable to ensure any policies and procedures are relevant to the trust.

Where schools use leisure provider pools, **partnership working is vital,** not only to keep pupils and staff safe, but also to ensure the inclusion of a breadth of aquatic opportunities, which meet the needs of all pupils.

3.1 Overall Oxfordshire County Council (Employer) Responsibility

Oxfordshire County Council as the Local Authority oversees swimming safety in all maintained schools through its Safe Practice in School Swimming Policy. In Academies, Foundation, and Voluntary Aided schools, this responsibility lies with the Governing Body as employer.

3.2 School Responsibility - Governors and Headteachers

The Headteacher, with support from the Governing Body, is required to designate a staff member as the 'School Swimming Co-ordinator' responsible for implementing the Safe Practice in School Swimming Policy for all school swimming activities. This includes managing either the school's own swimming facility or coordinating with third-party pool providers. Governors and Headteachers are expected to ensure that the school fulfills its 'duty of care' obligations by applying the policy and procedures outlined in this document, which include:

- **Risk Assessment** completion – A member of school staff should carry a copy of this with them, together with school emergency contact numbers in the School Swimming folder (with copy held centrally by Headteacher).
- **Pool Normal Operating Procedure (NOP) and Emergency Action Plan (EAP)** The school swimming co-ordinator should ensure **all** staff accompanying pupils to School Swimming have read and understood the current NOP and EAP for that pool.
- Ensure relevant training is in place and recorded for staff **accompanying school swimming**.
- Obtain a current, completed **OEAPNG 8.1r Swimming Pool Provider Statement** for the swimming pool provider if not already on the OCC eVisit system.
- Keep current copies of the **'Conditions of Hire'** details within the School Swimming folder.

- Ensure that all relevant and up to date medical and health information is maintained within the School Swimming Folder.

3.3 School Swimming Co-ordinator

A member of staff should be appointed as the School Swimming Co-ordinator, with responsibility for planning and co-ordinating swimming activities.

The School Swimming Co-ordinator is responsible for the following:

- Possessing and understanding all relevant and current NOP/EAP documents, planning and risk assessing activities with the Specialist Swimming Teacher. When engaging a pool provider's swim teacher for school swimming, key findings from risk assessments should be communicated to the school.

- Conducting risk assessments, which must be signed by all staff involved, including the Headteacher. These assessments include written information about pupils with medical conditions and/or additional needs, and this information is to be shared with the Specialist Swimming Teacher before the School Swimming and Water Safety programme begins. Updates should be made as necessary.

- Completing and sharing necessary documentation with Leisure Providers. Schools may use templates such as Swimming Class Registers and Pupil Information forms (which include details on pupils with medical conditions and/or additional needs; and information for Leisure Providers).

- Preparing a school swimming plan using the OCC eVisit Educational Visit planning system. Plans are subject to approval by the Headteacher.

- Ensuring that the eVisit profiles of staff accompanying school swimming are kept current, including first aid and swimming qualification details, in collaboration with the school Educational Visit Co-ordinator.

3.4 School Teachers/Staff Accompanying Pupils to their School Swimming Lesson

Teachers have a non-transferable duty of care whenever pupils participate in school or extracurricular activities, on or off site, during or outside school hours.

In relation to swimming, this means:

- Pupils are appropriately supervised when changing.
- Pupils are under control at all times.
- A headcount is taken before, during and after sessions.
- Normal and emergency procedures are followed and implemented as necessary.
- School staff have an overview of the teaching of their children and conduct of the class.

It is recommended that school teachers accompany their respective classes to swimming sessions whenever feasible, due to their specific knowledge of their pupils. This guidance applies to both school-owned and public leisure pools. The appropriate staffing levels should always be determined by a thorough risk

assessment, taking into account the number and abilities of pupils, as well as any identified health, medical, or behavioural considerations.

For all School Swimming and Water Safety lessons, in addition to the Swimming Teacher and Lifesaver, **there must be:**

- At least 2 members of school staff who accompany children to swimming lessons and remain poolside in an observational capacity.
- Class teachers should accompany their class where possible.
- At least one member of staff must have completed the Support Teacher of School Swimming training.

SE Support Teacher of School Swimming

- Practical Course, email healthandsafetyhelp@oxfordshire.gov.uk for published dates or training providers.
- Online* Course available at https://www.swimming.org/ios/course-information/support-teacher-school-swimming/.

*Both courses are acceptable, however, it is recommended that the practical course is completed at least initially and the online course used as a refresher.

3.5 Adults Other than Teachers (AOTTs)

AOTTs can be very helpful by:

- Supporting and working beside the school teacher / swimming teacher/s.
- Supervising changing.

Higher level teaching assistants (HLTAs) who have acquired specific competencies may replace a school teacher, so long as there is always another teacher accompanying the class and present on poolside.

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3.6 The Swimming Teacher (i.e., Leisure Provider Swimming Teacher)

The swimming teacher may be employed by a leisure provider or employed by a school to teach in their own pool.

Swimming teachers are specialist teachers with qualified teacher status who hold an appropriate swimming teaching qualification i.e.:

- Swim England SEQ Level 2 Teaching Swimming Qualification
- STA Level 2 Certificate in Swimming Teaching

In addition, where teaching specialist groups, additional qualifications may be required appropriate to the group, e.g. for children with disabilities:

- STA Award in Aquatic Teaching – Disability Swimming

Specifically, swimming teachers must:

- Understand their role in school swimming and water safety.
- They must be vetted by the disclosure and barring service (DBS) to work with children.
- Work in partnership with the School Swimming Co-Ordinator and other school staff accompanying pupils swimming.
- Ensure a suitable and sufficient risk assessment is undertaken and has been shared with them for each pupil group involved in swimming activities.
- Be aware of the additional needs and medical conditions of the children in their class, risk assessing these within the context of the swimming environment.
- With the support of school staff, ensure the safe conduct of the class whilst the children are in the water and on the poolside.
- Endeavour to make the lessons enjoyable.
- Prepare, plan and teach high quality school swimming and water safety lessons in partnership with the school appropriate to the pupils' age and ability – **to comply with National Curriculum requirements.**
- Ensure appropriate numbers of fully qualified lifeguards/lifesavers are on poolside.
- Be familiar with the Normal Operating Procedure (NOP) and understand their role and responsibility in the case of an emergency (EAPs).
- Be able to organise several other staff (pool staff or school staff) so that the teaching groups are a 'best fit' for the standards and ability stages of the pupils.
- If in a leisure centre, liaise with the lifeguards and pool centre staff concerning the school swimming session.

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3.7 Lifeguards (i.e. Leisure Provider Lifeguard/Lifesaver)

Pool operators have a responsibility for the safety of all who use their pools. Whenever children swim, there must be someone present with appropriate lifeguarding, rescue and first aid skills i.e. hold an appropriate national pool lifeguard qualification or rescue award.

Guidance on the number of lifeguards required can be found in HSG 179 Health and safety in swimming pools.

The person responsible for lifeguarding must:

- Be familiar with the Normal Operating Procedure (NOP) and understand their role and responsibility in the case of an emergency (EAPs).
- Directly supervise the pool and the pool users, exercising appropriate levels of control. (Note: the lifesaver/lifeguard should always remain on the poolside except in the case of an emergency).
- Brief pool users in advance regarding rules (e.g., no diving, running, etc.).
- Communicate effectively with pool users.
- Anticipate problems and prevent accidents.
- Intervene to prevent behaviour which is unsafe.
- Carry out an emergency rescue if required.
- Give immediate first aid to any casualty.
- Ensure that the pool is never left unsupervised whilst in use.

School staff and specialist swim teachers must work with lifeguards/lifesavers. Lifeguard/lifesaver instructions for safe conduct in the pool must be followed at all times.

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4. Programmed and Unprogrammed Sessions

In programmed sessions, such as swimming lessons, a higher degree of control is generally present, which may help to mitigate certain risks. Programmed sessions are described as those that follow a formal structure and are supervised and controlled.

Unprogrammed sessions, such as free play in a pool, require supervision by a qualified lifeguard. Un-programmed school sessions are typically not encouraged because of their less predictable characteristics and are subject to thorough risk assessments.

5. Provision for School Swimming Sessions (Persons and Training)

Swim Teacher Provision (from your Leisure Provider)

1 Swim England: Level 2 Certificate for Teaching Aquatics (ideally with Lifesaving/Lifeguarding Qualification)

OR

1 STA: Level 2 Certificate in Swimming Teaching (ideally with Lifesaving/Lifeguarding Qualification)

School Staff

In addition to the specialist swim teachers & teaching assistants and lifeguards/lifesavers:

- At least **2** members of school staff must accompany children to swimming lessons and remain poolside in an observational capacity.
- Class teachers should accompany their class where possible.
- At least one member of staff must have completed the Support Teacher of School Swimming training.

Lifesaver/Lifeguard

2 National Rescue Award for Swimming Teachers and Coaches (NRASTC) or 2 National Pool Lifeguard Qualification (NPLQ) (or 1 of each) – (1 of whom can be the Swimming Teacher if qualified in lifesaving)

Note: these are minimum requirements and subject to risk assessment

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6. Swim Teacher to Pupil Ratios

These ratios should only be used for guidance when writing risk assessments, Normal Operating Procedures and Emergency Action Plans and other factors need to be considered, including the competency and experience of the Swimming Teacher, Lifeguard provision (if the Swimming Teacher is also taking on the role of the Lifeguard), design of the pool and ability of the pupils.

Ratios of adults to pupils will be different for each class. A risk assessment to decide on an appropriate ratio should consider the following:

- numbers of qualified staff
- numbers of non-qualified assisting staff who are on poolside in a supervisory role
- pupils' levels of competence
- the facility, including water depth, and unprogrammed activities taking place at the same time
- Pupils' behaviour
- Pupils with SEND

Pupil/swim teacher ratios must not exceed the stated ratio and for most cases in primary school swimming will be less than this.

The following applies to Level 2 Swim England (or equivalent) Swimming Teachers and is based upon safety considerations rather than teaching requirements:

The ratio does NOT include school staff accompanying pupils.

Ability/age/activity	Pupil/Swim Teacher Ratio
Non-Swimmers and beginners - young children, normally primary school age, **unable to swim 10 metres unaided on back or front.**	**12:1**
Children under the age of seven - Irrespective of their swimming ability, group size should be restricted.	**12:1**
Improving swimmers - Swimmers who **can swim at least 10 metres competently and unaided on their back and on their front.**	**20:1**
Mixed ability groups - Pupils with a range of abilities (from improving to competent) where the **least able are working well within their depth.** Swimmers' techniques, stamina and deep-water experience should be considered. **They should not include beginners.**	**20:1**
Competent swimmers - Those swimmers who can swim **at least 25 metres competently and unaided on front and back and can tread water for two minutes.**	**20:1**
Swimmers with disabilities - Each situation must be considered individually, as people with disabilities each have specific needs. 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.	**4:1 with 1:1** support in the water where required

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7. Normal Operating Procedures (NOP)

Schools with pools are required to create or review risk assessments as a basis for documenting safe operating procedures for their pool. This includes preparing a Normal Operating Procedure (NOP) to maintain safety, and an Emergency Action Plan (EAP) that specifies actions to be taken in case of an emergency.

When using another facility's pool regularly, schools need to be familiar with the NOP to ensure compliance with expected safety measures, and with the EAP to understand the steps to take during emergencies.

Staff should be trained to follow these safety protocols and routinely practice emergency procedures with students at the start of each term.

All school staff must read and sign the Normal Operating Procedure (NOP) for any pool used for School Swimming, confirming understanding of their roles and responsibilities regarding safety during regular operation. The School Swimming Checklist is available as a reference document for school staff.

School staff who assist with activities in the pool are required to complete an induction on the NOP. This process must be documented by the school, signed by the person delivering the induction, and maintained on file.

8. Emergency Action Plan (EAP)

The pool operator is responsible for the Emergency Action Plan (EAP), and all staff involved in swimming activities must be inducted to understand their roles during emergencies.

Safety signs, including emergency arrangements, must be visible throughout the pool area, and pupils should be informed about them. Staff must ensure that all pupils—including those with limited English, visual impairments, or reading difficulties—understand these safety signs.

Each school class should run emergency drills at the start of every term and regularly thereafter so both staff and pupils know how to recognize and respond to emergency signals. The School Swimming Co-ordinator should observe these drills whenever possible.

Consideration needs to be given to:

- Pupils leaving the pool during an emergency with bare feet
- Pupils with additional needs or physical disabilities

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 always be operable without the aid of a key when the pool is in use. These should be checked at the start of every lesson.

Safety equipment such as poles, torpedoes, throwing ropes or throw bags, first aid provision (including emergency blankets) and emergency alarms need to be fit for

purpose, well-maintained and sufficient in quantity. Equipment needs to be accessible and readily available when needed without creating additional hazards to pool users.

All swimming pools must be fitted with an **alarm** or a suitable alternative backup system to enable prompt assistance in the event of an accident or incident. These safety devices should be routinely inspected and maintained to ensure they remain fully operational. In cases where no alarm is present, a landline phone must be available at the poolside and checked before each lesson. **Access to emergency services must be assured at all times when the pool is in use.** Mobile phones may also serve as a backup; however, signal strength and battery levels should be verified upon arrival at the poolside prior to any lesson.

All pools need to have a clear procedure for removing **pupils with physical disabilities**. Where a pool has a spinal board/special recovery stretcher, Leisure Centre staff should receive training in this. It is recommended that special schools have a spinal board on poolside. Specialist training will be required for this situation.

A variety of teaching and flotation aids should be available. Equipment should:

- Conform to any British standard.
- Be regularly checked to ensure it is safe to use and there are no defects.
- Be close at hand for ease of access during lesson but be kept tidily on poolside to minimise trip hazards.
- Be used appropriately to avoid over-reliance.
- **Not be given to non-swimmers to allow them into water out of their ability depth.**
- Be appropriate and safe for the needs of pupils.
- Be correctly fitted or held according to the design and purpose of the aid.
- Be regularly cleaned.

Any special electrical equipment required on the poolside needs to be Risk Assessed.

It should be:

- Designed for use in an aquatic environment.
- Of low voltage or battery operated.
- Located so as not to create an additional hazard.
- Have current circuit breakers attached.
- PAT tested annually.
- Checked regularly.

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9. Pool Rules

A copy of the pool rules will be found in the site's Normal Operating Procedures (NOP). Rules will vary from pool to pool, so it is important that school staff read and understand the NOP for the site that they are using before the first session.

The pool rules should be displayed and explained to all pupils before their first School Swimming lesson. Pupils should be reminded at the start of each term and ideally coincide with the emergency procedures when tested (i.e., alarms). The following are examples of standard pool rules. It is by no means a comprehensive list.

- Pupils must not enter the poolside unless a lifeguard/lifesaver is present.
- Pupils must not leave the pool without permission, nor return without reporting to the person in charge.
- Pupils must not approach or enter the water until instructed to do so.
- Pupils must walk, not run, on the poolside.
- Pupils must respond immediately to all instructions.
- All those on poolside must understand and respond appropriately to pool emergency procedures.
- Report on any unacceptable, unsafe behaviour.
- No food to be consumed on poolside, including sweets and gum.
- No shouting.
- No jumping or diving unless instructed to do so*.
- No jewelry to be worn.
- No outdoor shoes on poolside.
- Swim caps must be worn and other hygiene procedures for the pool followed.
- Goggles may be worn if that is the school's' policy.
- Report any illness.
- Medication that may be required should be at the poolside.
- Pupils must understand that poor and inappropriate behaviour will have consequences, and they may be removed from the lesson(s).

*Only Swim England Level 2 / STA Level 2 Certificate in Teaching Swimming Teachers are qualified to teach diving.

The pool's NOP should be checked before allowing jumping in, as water may be too shallow. Pool depth needs to be at least 1m, although Swim England advises a risk assessment to be undertaken before permitting jumping to take place into water of less than 1.5m.

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10. Risk Assessment

10.1 School risk assessment for swimming activity

Every pool and session requires attention to specific safety needs due to the unique characteristics of the children and staff participating. Each situation should be addressed separately.

School staff, typically class teachers, are required to complete a written risk assessment for the pool visit, which includes travel to and from the location and all planned activities. This forms part of their lesson planning process and is monitored by the School's Swimming Co-ordinator. The assessment must include details of hazards, risk potential, and control measures, such as supervision arrangements (during travel, changing, and swimming), lifeguarding, and ratios for classes, groups, or lessons. Considerations should cover:

- The age and ability of children in each class,
- The activities being undertaken,
- The qualifications of staff leading and supporting the session.

The risk assessment must be completed prior to the commencement of swimming activities but may require updates based on experience. Risks related to individual children with special needs or disabilities will be included in class risk assessments. Staff members should conduct an ongoing risk assessment during each pool session to respond to current conditions and manage identified risks.

The school is responsible for providing the Specialist Swimming Teacher with a register, up-to-date medical records, and other relevant information (such as additional needs) before starting the swimming programme. The register of attending children should be kept current and given to the Specialist Swimming Teacher for verification before each lesson.

10.2 Pool Risk Assessment for School Own Pools

When a swimming pool is located on school premises, it is the host school's responsibility to carry out thorough risk assessments. This involves identifying potential hazards at the pool, evaluating associated risks, determining measures to eliminate or control those risks, and implementing these measures accordingly. The host school must also ensure that all hirers—including other schools and external users—are informed of the identified risks as well as the required control steps.

Risk control measures (excluding the risk assessment itself) are documented within:

- Normal Operating Procedure (NOP)
- Emergency Action Plan (EAP)

Copies of the NOP and EAP should be provided to all hirers. Furthermore, the host school must confirm that visiting staff fully understand the pool's operational procedures and their responsibilities during an emergency.

It is the responsibility of the visiting school's swimming coordinator to:

- Conduct a preliminary visit to become acquainted with the pool and understand how the NOP and EAP are applied.
- Ensure that all staff involved in swimming sessions at the pool have access to the NOP and EAP. These documents should be re-issued to all hirers upon review, and the school should verify annually with the pool management that no changes have occurred.

- Maintain records of staff training in relation to the implementation of the NOP and EAP.

A practical induction should be arranged for any new staff attending the pool. If the swimming coordinator of the visiting school changes, they must also complete a preliminary visit to familiarise themselves with the pool and the relevant procedures.

10.3 Pool Risk Assessment for Third Party Leisure Pool Providers

When public pools are used for swimming lessons, the Pool Manager is responsible for providing the Normal Operating Procedure (NOP) and Emergency Action Plan (EAP) to the school's swimming coordinator. The coordinator must ensure that all visiting staff fully understand pool operations and their responsibilities in an emergency situation. The responsibilities of the school's swimming coordinator include:

- Conducting an initial site visit to become acquainted with the pool facilities and to contextualise the application of the NOP and EAP.

- Distributing the NOP and EAP to all school staff involved in swimming sessions at the pool. These documents should be reissued to all users whenever they are updated, and the school must annually verify with pool management that no changes have occurred.

- Recording staff training relating to the implementation of the NOP and EAP. It is essential to arrange practical induction whenever new staff members attend the pool. If a new Swimming Coordinator is appointed, they must also conduct an initial site visit to understand the facility and relevant procedures.

- Ensuring the provider completes and supplies the school with a current OEAPNG 8.1 Swimming Pool Provider Statement, if this documentation is not already available on the OCC eVisit system.

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11. Other swimming and water-based activities

11.1 Hydrotherapy Pools

Supervision for water-based activity in hydrotherapy pools typically requires higher staff-to-participant ratios, often involving one-to-one supervision in the water. These pools are generally not deep-water pools; therefore, for teachers and physiotherapists, the Aquatic Therapy Pool Rescue Award (ATPRA) is a suitable qualification when pupils require additional support. Adults assisting individuals in the water can only supervise the person they are supporting and should not be included in overall supervision ratios. Lifeguarding responsibilities should be performed by qualified personnel stationed at the poolside. Physiotherapists are expected to complete a recognized professional course relevant to managing hydrotherapy activities. The necessary skills are based on assessments of each child's individual needs. Schools with hydrotherapy pools are advised to implement apprenticeship programs so that new staff can train alongside experienced staff before assuming full session responsibility. This induction may occur within a single school or across multiple schools.

11.2 Using Pools on Educational Visits

When school groups use swimming pools for educational visits, all standard safety conditions must apply. Activities are typically recreational. A qualified lifeguard is required, and teachers should actively collaborate with the lifeguard to supervise students, not converse or stand together on the poolside. If no onsite lifeguard is available and the school provides its own, ensure exclusive pool use to control numbers and maintain safeguarding standards. Lifeguarding qualifications should match those required for similar activities in the school's own or hired pools.

11.3 Open Water – rivers, lakes, reservoirs, canals or the sea

Swimming and paddling or otherwise entering the waters of river, canal, sea or lake (e.g. for pond or river dipping) is a high-risk activity and should never be allowed as an impromptu group activity. The pleas of young people to be allowed to bathe – because it is hot weather, for example - should be resisted where the bathing has not been considered as part of the overall plan.

Bathing activities can only take place when a specific risk assessment has been completed, and control measures are put in to reduce risks to an acceptable level.

Before undertaking any 'open water' activity schools must submit their plan to the Outdoor Education Adviser for review and endorsement via the OCC eVisit portal.

Further guidance on Natural Water Bathing and Group Safety at Water Margins can be found in OEAP guidance.

For bathing, it is expected that group leaders will seek out recognised bathing areas that have official surveillance i.e. qualified lifeguard cover. Where this isn't available, the activity may only go ahead if the school has its own rescue-trained staff with appropriate safety equipment. Even then, group leaders should be aware that young people may mingle with members of the public and be lost to view. Young people should always be in sight and reasonable reach of their supervisors.

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The group leader must:

- Be aware this is a high-risk activity and many children who drown are strong swimmers.
- Ascertain for themselves the level of the pupils' swimming ability.
- Check the weather.
- Be aware of the local conditions – such as currents, weeds, rip tides, a shelving, uneven or unstable bottom – using local information from the lifeguard, coastguard, harbourmaster, police or tourist information office.
- Beware of rocks, breakwaters and other potential hazards.
- Look out for warning signs and flags: a red flag means it is unsafe to swim; yellow flags mean that lifeguards are on patrol in the area between the flags; a black and white flag means it is an area used by surfers and not suitable for swimming.
- Designate a safe area of water for use by the group.
- Brief the group about the limits of the swimming area.
- Avoid crowded beaches where it is harder to see young people.
- Be aware of the dangerous effects of sudden immersion in cold water.
- Be aware of the dangers of paddling, especially for younger children.
- Ensure that young people have not eaten (for an hour) before swimming.
- Ensure the activity is suitable for young people, especially any with special needs or disabilities.
- Adopt and explain the signals of distress and recall.
- Ensure that buoyancy aids, lifejackets etc. are used where appropriate.
- Carry out regular head counts.
- Be aware that it is not always possible to tell when someone is in difficulties.

Supervisors must:

- Have clear roles – at least one supervisor should always stay out of the water for better surveillance, even where lifeguards are on duty.
- Take up the best position from which to exercise constant vigilance.
- Divide their careful watching between staff who stand in the sea and look landward towards the group and staff who stay on land and watch the group from that vantage point.
- Give the young people their full, undivided attention.
- Follow the advice or directions of a lifeguard.
- Never swim themselves unless they help a young person in distress.
- Not joining in any of the games with young people.
- Advise young people to stay well within their depth.
- Be prepared to act immediately when a young person appears to be in difficulties.

- Ensure that young people leave the water immediately if they get too cold, especially if toes and fingers look blue or feel numb – could suggest the onset of hypothermia.
- Recognise that a young person in difficulty may not wave or shout – all their energies could be focused on trying to keep afloat.

Jumping and diving, as from sea cliffs or gorge environments, should be treated as a specialist adventure activity and be supervised accordingly only by a competent and qualified adventure activities leader.

11.4 Coasteering and gorge walking/ghyll scrambling are licensable activities

This means that by law any commercial provider of these activities must hold an Adventurous Activities Licensing Authority (AALA) licence issued by the Health and Safety Executive. Schools can check whether a provider holds a licence: https://aala.hse.gov.uk/aala

12. Child Protection and Safeguarding

12.1 Child Protection Policies

The Council (the 'Local Authority') and the school will have their own Child Protection Procedures and so too should the pool. It is important that the pool procedures relate to those of the Council. A school using a pool other than their own should establish a protocol identifying the relationship between their respective procedures.

The school should assure themselves that all people working with children have carried out appropriate DBS checks and undertaken any other relevant safeguarding vetting checks. Each school and pool should have a designated person with responsibility for Child Protection, the Designated Safeguarding Lead.

Staff must report any unexplained marks or bruises noticed on a child during changing to the school's designated person immediately.

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:

- Essential to develop a swimming skill or technique
- To treat an injury
- To prevent an injury
- To meet the requirement of the activity (e.g. Lifesaving)
- To lift or manually support a child with disabilities
- 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 physical contact to the child. Unless the situation is an emergency, the adult should ask the child for permission. 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. School staff should also refer to their school code of conduct/staff behaviour policy or safe practice document.

Swim England guidance for "Best Practice within your Swimming Lessons" can be found here: https://www.swimming.org/swimengland/best-practice-within-swimming-lessons/

The protocols that Swim England suggest including:

- Ensure there is a system included within the Pool's NOP/EAP whereby the parent or guardian of the pupil gives permission for the teacher to handle the children for the purposes of supporting them in the water or manipulating limbs to convey correct stroke techniques (this could be through the parental swimming permission form).
- Ensure that any handling of pupils is done within clear sight of other people.
- Always explain to the pupil that you are now going to hold him/her and why, to avoid embarrassment.
- Swimming Teachers must never support pupils in such a way that their hands cannot be seen by the spectators.
- Never support a pupil by handling the swimmer's torso.
- Only support swimmers by holding their hands, head or feet.
- Additionally, teachers should NEVER teach or coach a swimmer alone.

12.2 Accidents

When a child is injured and receives First Aid, parents or carers must be notified as per school policy, with details recorded and retained. Pool staff should document accidents on their forms and report them to the Council; academies follow their own procedures. If a child needs hospital treatment, a familiar school representative should accompany them. Should this reduce pool group staffing, the school must arrange additional support. Parents or carers should be informed promptly.

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13. Health and Medical Conditions

13.1 Swimmers with health and medical conditions

The Swimming Co-ordinator must ensure that all relevant health and medical information is maintained within the School Swimming Folder. This must be regularly reviewed and updated as required.

It is a requirement that all relevant medical conditions are documented on each school's swimming register and Risk Assessment; and that each Specialist Swimming Teacher and accompanying School Staff must be in possession of all medical information one week prior to that child swimming (*Swimming class registers including information on pupils with medical conditions and/additional needs - information for Leisure Providers*). This will need updating when necessary.

If a child experiences a new medical condition during a School Swimming lesson, this must be documented in writing by the Swimming Co-ordinator and additionally recorded in the Accidents Register. School staff should discuss the condition with the Parent/Guardian/Carer of the child and review whether the pupil is able to continue swimming. This will ensure that safe procedures can be put in place before the child participates in the next swimming lesson.

It is the responsibility of the school to ensure that all medication (including inhalers) is always accessible on poolside.

A child will not be allowed to swim if their medication is not available, unless an emergency salbutamol kit (with a 'spacer') is available from school: refer to Department of Health, (2015) Guidance on the use of salbutamol inhalers in schools

and Department of Health, (2017) Guidance on the use of Adrenaline Auto-injectors in Schools

Written permission from parents may be required prior to allowing a child with a particular medical condition to participate in the school swimming programme. The school may need to seek help from a medical professional to understand how swimming and other water-based activities may affect the child.

The requirements for pupils who suffer from seizures may vary depending on whether an effective medication management regime is in place, the effectiveness of this in controlling the onset of episodes and whether the child has a history of episodes whilst swimming. Each child should be **Individually Risk Assessed** separately to determine the support they require. Some may require 1 to 1 support in the water and some a dedicated spotter on poolside.

Using a 'buddy' system with a pupil or helper in the water can provide non-intrusive supervision which also avoids embarrassment on behalf of the child.

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14. Changing Rooms

14.1 Supervision of changing rooms

Accompanying school staff are responsible for providing appropriate supervision whilst the pupils are changing.

If children are using a mixed sex changing area with cubicles, then a member of staff of either gender may supervise.

If using open-plan single-sex changing areas then only staff of the appropriate gender should enter the changing room, unless in an emergency.

If children under the age of seven are swimming, a mixed gender group may use an open plan single-sex changing room, if schools do not have the staff of the appropriate number or gender to supervise children in their own-sex changing room. In a public pool, this will need to be notified to and approved by the pool management.

Teachers will sometimes have to operate a remote supervision procedure when gender balance is not appropriate. This can only happen where the children are responsible enough and mature enough to take on significant personal responsibility whilst changing. To protect themselves, two members of staff should operate together when controlling by voice through doorways or entering changing areas in an emergency.

14.2 In public pools

Ideally, children will use separate school changing areas to avoid sharing facilities with members of the public. Pool operators should be requested, when feasible, to organise separate areas or times for this purpose. If this arrangement is not possible, the school and pool management should agree upon appropriate supervision.

If changing occurs in open plan public single sex changing rooms and the school does not have staff of each gender available, pool management must arrange for a suitable staff member to monitor the changing area while children are present. This staff member should have child protection training. To ensure no staff member is left alone with a single child, all children need to wait until everyone is ready before leaving the area. All supervisory staff must have undergone appropriate checks through the Disclosure and Barring Service (DBS).

14.3 In school pools

Children will be able to change without members of the public being present. The arrangements for the supervision of children should be as for paragraphs 14.1 and 14.2 above.

- Only staff of the appropriate gender should enter the changing room, unless there is an emergency.
- Using members of the opposite gender to supervise mixed-gender groups in separate changing rooms is acceptable unless there are significant elements of relative intimate contact that may affect the dignity, comfort and confidence of either pupils or staff.
- A mixed gender group of pupils under the age of seven years may use an open plan, single sex changing area with agreement from pool management.

- Discuss changing arrangements with your leisure provider before swimming sessions commence.
- Where pool staff can assist with supervision of changing rooms (should it be necessary), this arrangement with the pool management needs to be assured and consistent. This may include, for example, pupils using dry side changing facilities if available; disabled changing areas (where appropriate) or signs on changing room doors requesting members of the public change in cubicles.
- There should never be a situation where a member of staff is left alone with a child. Should this incident arise, this must be reported on return to school. All the pupils should remain together in a group. Care should be taken in changing rooms to ensure that the appropriate ratios and gender of staff are present to supervise pupils and that pupils are safeguarded from members of the public.
- Where additional help is required, if, for example, a child has additional needs, a second adult must be present, and both the pupil and parent/carer's consent must be sought.

AfPE Safe Practice in Physical Education, School Sport and Physical Activity provides further guidance considerations for changing rooms including

- Safeguarding and child protection
- Changing areas
- Separating children of different genders
- Transgender and non-binary children
- Staff supervision
- Children and young people who need help getting changed
- Using off-site changing rooms

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15. Swimming Attire and Equipment

15.1 Teacher clothing and equipment

School staff are required to switch to appropriate footwear to facilitate safe movement around the pool area and prevent outdoor dirt from being transferred onto the pool surround.

School staff are expected to wear clothing that is appropriate for the pool environment, including humidity and temperature, and suitable in case they need to enter the pool to assist with a child rescue.

For outdoor pools, wearing a peaked hat and polarised sunglasses can provide protection. When teaching for extended periods, it is advisable to use an appropriate sunscreen due to the increased reflection of the sun's rays from the water.

Teachers should all be equipped with a whistle and familiar with the standard signals used in most pools, to either use their whistle correctly or respond to whistle.

An example of a Whistle Drill might be:

One short blast: To get pool users' attention
Two short blasts: To alert a lifeguard or staff
Three short blasts: Lifeguard taking emergency action

N.B. Schools should refer to their NOP/EAP for communication signals as these are likely to vary from pool to pool.

15.2 Swimming costumes

Pupils should wear swimwear that meets safety, cultural, and instructional needs. Swim clothing must fit closely to reduce drag, though sensitivity is needed when cultural norms call for loose garments. It's also important for instructors to see limb and joint movement for effective learning.

15.3 Verruca socks

Pupils with verrucae or similar foot infections may participate in swimming if the affected area is covered with a verruca sock.

15.4 Goggles

Goggles are generally not recommended for school swimming lessons or short races, as they can distract beginners. Pupils who swim often or have sensitive eyes may use goggles if requested by parents or carers. Swimming Teachers must ensure goggles are used safely; if not, pupils should remove them. Poorly fitted goggles can impair vision, and staff should not help fit or adjust them.

Parents should teach children to put on and take off goggles properly, without stretching the band away from the face, to avoid injury. This guidance should be part of the school's Risk Assessment. Goggles must be made of unbreakable material and meet British Standard (BS 5883:1996), with packaging including safety instructions.

If pupils report eye irritation, the pool operator should check the chemical balance.

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16. Conditions of Hire

Leisure Providers retain responsibility and accountability for the operation of their pools. When a Leisure Centre Pool is hired by an external organisation, the Leisure Provider must ensure that the pool will be used safely.

Similarly, when a school hires a pool from another organisation, the provider must assist the school in ensuring safe use of the facility, including safeguarding children and vulnerable adults.

This process begins with the hire agreement and any conditions implemented by the provider. These conditions are informed by the pool's Normal Operating Procedure (NOP) and Emergency Action Plan (EAP).

The hire agreement should be reviewed periodically, with confirmed dates and times documented in a signed contract between both parties. Hirers are to receive current copies of the relevant NOP and EAP for the pool, as well as any session-specific conditions. A qualified RLSS NRASTC or NPLQ Lifeguard is required to be present, regardless of the depth of the pool.

16.1 Conditions of hire should include:

- The name and address of the hiring organisation.
- The name and address of the pool being hired.
- Details of the hirer's representative (primary contact person), including their name and contact information.
- Description of the intended activity for the hire, to enable an assessment of risk and determination of appropriate safety protocols according to session type.
- Number of participants, along with information on their age and swimming ability. For school block bookings involving multiple classes or groups with varying abilities, the form should comprehensively reflect all relevant details as teacher ratios, equipment needs, and designated pool areas may differ between groups.
- A clearly defined agreement outlining the respective responsibilities of both the hirer and the pool operator. This includes, but is not limited to: required number and qualification of Swimming Teachers; allocation and qualifications of lifeguards; level of lifeguard provision; First Aider qualifications; protocols regarding child protection; and overall staffing levels.
- Explicit designation of roles and responsibilities in the event of an emergency. Typically, the pool operator will be responsible for building-related issues, while the hirer will manage emergencies related to group activities. Responsibilities for poolside emergency equipment (e.g., first aid kits, rescue apparatus) must be specified. The pool operator is responsible for addressing structural faults or power failures and ensuring that qualified staff are available during the hire period.
- Provision of relevant safety advice to swimmers and enforcement of any specific rules applicable during the hire.

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- Signature from the hirer confirming receipt, thorough reading, and understanding of the Normal Operating Procedures (NOP) and Emergency Action Plan (EAP).
- Evidence of completion of a recent Safeguarding Course.
- All personnel working with children must possess an up-to-date Disclosure and Barring Service (DBS) certificate, which must be presented with the hire agreement.
- Proof of suitable third-party liability insurance, specifically public liability coverage of at least £10 million.
- **Un-programmed sessions** (where permitted): Supervision ratios must differ from those of structured swimming lessons. A qualified NPQL Lifeguard **must** be on duty regardless of pool depth. Reference must be made to the pool's NOP, as unprogrammed sessions may be prohibited due to their unpredictability. Furthermore, close adult supervision is mandatory for young children:
    - Children aged 4 years and under require a 1:1 supervision ratio.
    - Children 8 years old and under require a supervision ratio of no more than 2:1.

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17. Key Contacts

Health and Safety Team Email: Healthandsafetyhelp@oxfordshire.gov.uk

18. External Links

Guidance:

Association for Physical Education (AfPE). Safe Practice in Physical Education and Sport.

Swim England. School Swimming and Water Safety Charter. Free to join: resources to assist with the teaching of swimming and water safety in Primary Schools.

Health and Safety Executive (HSE) HSG 179 'Health and Safety in Swimming Pools' 2018.

Organisations:

Swim England (SE)

Swimming Teachers Association (STA)

The Royal Life Saving Society UK (RLSS UK)

Association for Physical Education (AfPE)

CIMSPA - chartered professional body | CIMSPA

BSCA | British Swimming Coaches Association

19. Equality, diversity and inclusion

The council will regularly monitor and review the impact of this policy and procedure.

The council needs to consider the equality, diversity and inclusion impact of its policies and procedures on its employees and in some cases, a formal EIA (Equality Impact Assessment) may not always be appropriate. For any queries on this, please contact the HR Policy Manager in the first instance or email equalities@oxfordshire.gov.uk.

20. Variation of policy and procedure

This policy and procedure are subject to ongoing review and may be varied by the council from time to time. Examples of variation include the need to comply with new legislation or best practice guidance.

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21. Supporting information, guidance and forms

The following is provided as separate supporting information to this policy.

21.1 School swimming:

- Checklist for school swimming
- Considerations for those involved in primary school swimming galas
- Example letter to parents re permission to wear goggles
- Induction training grid for leisure providers and schools
- Model risk assessment for school swimming using an onsite school managed pool
- Model risk assessment for school swimming visiting a leisure provider pool
- Procedure for organisers and school attending swimming galas
- Risk management considerations for centrally organised sports events
- Swimming class register and student information

21.2 Pool management:

- Application for hire of school pool
- Conditions of hire of school pool
- Generic procedure for pre-commissioning and decommissioning of seasonal pools
- Guidance on pop up swimming pools
- Model chemical spill procedure
- Model Emergency Action Plan (EAP) for school pool
- Model Normal Operating Procedure (NOP) for school pool
- Model pool water quality log sheet

Appendix 1 Executive Briefing on Safe Practice in School Swimming

Executive Briefing: Safe Practice in School Swimming Policy

1. **Purpose**

   This policy sets out Oxfordshire County Council's required standards for the safe planning, delivery, and management of school swimming and water-based activities. It ensures compliance with the National Curriculum, AfPE, Swim England, HSE (HSG179) and OEAP guidance, and provides a consistent framework for schools, leisure providers, and staff.

2. **Key Responsibilities**

   Local Authority / Governing Bodies
   - OCC oversees compliance in maintained schools; academies must ensure equivalent safety arrangements.
   - Strong partnership working with leisure providers is essential.

   Headteachers & Governors
   - Appoint a **School Swimming Co-ordinator**.
   - Ensure completion and oversight of:
     - Activity-specific **risk assessments**
     - **Normal Operating Procedures (NOP)** and **Emergency Action Plans (EAP)**
     - Staff training, DBS status, and qualification records
     - Up-to-date medical and safeguarding information

   School Swimming Co-ordinator
   - Leads planning and liaison with leisure providers.
   - Ensures NOP/EAP distribution and staff understanding.
   - Provides swimming registers, medical information, and qualified staffing.

   School Staff
   - Maintain duty of care throughout travel, changing, poolside supervision, and lessons.
   - Ensure behaviour control, headcounts, and emergency drill readiness.

   Swimming Teachers & Lifeguards
   - Must hold appropriate qualifications (e.g., Level 2 Swim England/STA; NPLQ/NRASTC).
   - Must know and operate within the NOP/EAP.
   - Lifeguards must provide uninterrupted supervision.

3. **Staffing & Ratios**

   Minimum core provision:
   - **2 school staff** on poolside in addition to qualified swimming teacher(s) and lifeguard(s).
   - At least **one Support Teacher of School Swimming**-trained staff member.

   Pupil-to-swim teacher ratios (maximum):
   - Beginners/under 7s: **12:1**
   - Improving, competent, mixed-ability: **20:1**
   - Disabilities: **4:1** (with **1:1** in-water support where needed)

4. **Safety Framework**
   - NOP/EAP must be read, understood, and signed by all involved staff.
   - Emergency drills must be practised termly.
   - Pre-session checks of alarms, exits, phones, signage, equipment, and safety gear are mandatory.
   - Schools must supply full medical details in advance; medication must be poolside.

5. **Safeguarding**
   - All staff must have appropriate DBS checks.
   - Clear protocols for changing room supervision based on gender, age, and pool layout.
   - Physical contact must be minimal, explained, and only for necessary teaching or safety reasons.
   - Any safeguarding concerns or unexplained injuries must be reported immediately.

6. **Special Contexts**
   - **Hydrotherapy:** Higher staffing ratios; specialist rescue training (ATPRA).
   - **Educational Visits Pools:** Qualified lifeguard required; teachers assist in supervision.
   - **Open Water:** High-risk; requires Outdoor Education Adviser approval through eVisit; strong control measures and qualified rescue staff.

7. **Conditions of Hire**
   Pool hire agreements must define:
   - Roles and responsibilities
   - Staffing and lifeguard requirements
   - Safeguarding expectations and DBS checks
   - Public liability insurance (£10m)
   - Emergency responsibilities and NOP/EAP confirmation

8. **Headteacher/Manager Assurance Summary**
   This policy provides a comprehensive and robust system enabling schools to deliver safe, high-quality swimming and water-safety programmes. Effective implementation relies on:
   - Clear responsibilities
   - Competent staffing
   - Strong risk management
   - Accurate information sharing
   - Consistent safeguarding practice

Oxfordshire County Council
Health and Safety Team
2026