

Safety in Cottonmill Swimming Pool – Pool Safety Operating Procedures

Introduction

St Albans Sub-Aqua Club Ltd rents the old outdoor public swimming pool on Cottonmill Lane, St Albans, from the local council, along with its ancillary buildings. The pool was built in 1905, although has been altered and deepened since. The old filtration system was no longer functional and was removed by the Club in the early 1980s. More recently, the Club has carried out repair and maintenance work comprising removal of potentially unsafe structures such as the slide and springboards, the repair and replacement of pool-edge copers, and a continuous programme of identifying and repairing leaks.

The pool is available for use by Club members and their guests only. Many Club members have keys and have access to the pool at any time.

Currently, the pool is in use during the summer months only – usually June to September.

This document relies heavily on guidance included in “Managing health and safety in swimming pools” issued by the Health and Safety Commission, which, although it deals with commercial pools, does still offer a lot of advice relevant to our situation. To quote from the introduction, *“Following the guidance is not compulsory and you are free to take other action. But if you do follow the guidance you will normally be doing enough to comply with the law.”*

Who is responsible for safety?

As a private members’ club we are not subject to the same H&S rules as a commercial operator. Our pool is used only by its owners (the members) and their guests. We do not consider that the responsibilities and relationships between a commercial operator, its employees and their customers can be transposed directly onto a club setting of a committee, members and guests. We therefore fall some way between a domestic and a commercial pool.

Nevertheless, the committee of St Albans Sub-Aqua Club is aware of its responsibility to ensure that the pool is used as safely as possible. However, all individual members, as part owners (of the lease if not the freehold) have a responsibility to contribute towards maintaining the safety of their swimming pool by volunteering their services as required. All members must do all that is reasonably practicable to take care of their own health and safety and that of others,

This is very different to a commercial setting, where the operator and its employees are absolutely responsible, with only a limited duty of care falling on the customers.

As in any organisation, *everybody* is responsible for safety.

Limitations to the provision of safety

The alternative to accepting the following limitations would be to close down the pool. We therefore believe that, in a club setting, operating a pool under these circumstances is not unreasonable.

It must be accepted that the resources of the club are limited and the pool is over one hundred years old. It is therefore not possible to operate the pool to modern day standards.

The pool is available for use at any time by any member, and it is therefore not possible to ensure that volunteer lifeguards are on duty at all times.

The old water filtration system has been removed and it is not financially viable to replace it. This results in an inevitable issue with water clarity towards the end of each season.

All members must be made aware of these safety limitations, and must make their own judgement as to whether they wish to use the pool.

Nevertheless, the club committee acknowledges its obligation to ensure that all possible safety measures are put in place within the above constraints

Who should be allowed to use the pool?

Members – provided that they have acknowledged reading the club rules, which contain clauses pointing out the risks involved. This should be reinforced by appropriate signage.

Members' guests (as defined in the club rules) – provided that the member remains present for the whole time of the guest's visit, complies with all club rules, and has been made aware of the risks involved by appropriate signage.

Members and guests may also accept the risks on behalf of their own (but not other people's) children.

Members and their guests may use the pool for non-swimming activities, for example model boats – provided it doesn't interfere with other pool users.

All children, in the pool or on the poolside, must be under the supervision of an adult member at all times.

Supervision

Under the Regulations (J2) the pool can only be used when a Suitably Qualified Member is on the premises. This means anyone who has had rescue training as part of a diving, snorkelling or swimming course.

Vulnerable pool users

Under 5's are at particular risk in and around swimming pools. They must never be left unattended - in the pool or on the poolside – not even for a minute.

Solo swimmers are at risk. The absence of anyone to help can turn a minor problem (cramp, accident, health issue) into a fatal incident. However, adult members who obtain written permission from the committee each season, and who explain that they fully understand and accept the risks involved, may do so. They are strongly advised to notify friends or family where they are going and when they will be back.

Those swimming after consumption of food or alcohol are particularly at risk and should be discouraged. Also rowdy behaviour. Teenage children may be the most vulnerable group.

Scuba divers should dive in accordance with their own guidelines – even in a swimming pool.

There are additional risks towards the end of a season, when the water may have turned green and cloudy. Any swimmer who has a problem and sinks to the bottom may remain undetected. Always know where your friends are, and tell them if you are leaving the pool for a break.

Participants in organised pool games will be more vulnerable to injury, and the organisers of these events must give careful consideration to their safety.

Poolside users

Not everyone wants to be in the water. Those on the poolside for a BBQ, a drink in the sun, sunbathing, or just watching the fun, may also be at risk. Falling in is the obvious hazard, but there are also trip hazards, getting splashed by pool users etc.

There are a number of trip hazards around the poolside. Beware of drainage channels and gulleys – some may have broken or missing gratings. The poolside adjacent to the river is subsiding badly, resulting in uneven levels and pool edge copers that are not flush with the surrounding areas.

Take particular care if you have been drinking, or if you can't swim.

Broken glass is a real danger to those with bare feet. Only cans or plastic glasses are allowed on the poolside – no glasses.

There are fewer opportunities to be on the poolside in the winter, but extra care should be taken when there is little or no water in the pool.

Throwing people in is strictly forbidden.

Take care around the barbecue area and observe all the usual precautions. BBQ's can be hot and can cause fires if left unattended. The club will not cook your food for you, so make sure your meat is thoroughly cooked through before eating. If in doubt, there is a microwave indoors!

Control of admissions

Any adult member may apply for a key – subject to their membership grade – and this key will also allow them access to the poolside. Members who refuse to comply with club rules or these guidelines may have their keys withdrawn.

If a keyholder opens up, he/she has the responsibility of locking up, or handing that responsibility to another keyholder.

The pool area is surrounded by a high brick wall, topped with barbed wire, to deter unauthorised access.

Personal safety

The front door should latch when closed, denying access from the outside except by keyholders. If it doesn't please contact a committee member. In no circumstances should the front door be locked from the inside with the key – this sets the alarm, which will go off!

Any unauthorised person, entering either through the door or over the wall, should not be confronted. Politely ask them to leave (ask them to come back on a Wednesday evening if they are legit). Call a friend or another member (committee if possible) and if all else fails, leave quietly and call the police. Do not get involved in any confrontation, especially if you are alone. It might turn violent.

After dark

Use of the pool after dark is not permitted – both for safety reasons and to avoid nuisance to our neighbours.

External poolside lights are controlled from a switch outside the compressor room. There is a large red indicator lamp showing when the lights are on. The external lights should be used when the poolside is in use after dark, but should be turned off as soon as all persons have returned indoors.

Electricity

Electricity is available on the poolside and in some of the outbuildings for lighting, fridges etc. Also occasional power tools, pumps etc. Do not operate any electrical equipment whilst wet.

Emergency equipment

Flotation devices, ropes and poles should be located around the poolside.

If necessary, the emergency services should be contacted using a mobile phone, the phone outside the gents' toilets or the public phonebox in the street outside. Dial 999 or 112. The location of the pool is Cottonmill Lane (near the junction with Cottonmill Crescent) in St Albans, Hertfordshire. Postcode AL1 1HJ. Remember you may have to open the front door for them.

A first aid box is located in the bar area.

An Automatic External Defibrillator may be available (at the time or writing funds were being raised to buy one). Every member should know where it is and how to use it. If you don't know – ask.

Pool water treatment

The committee authorises at least one competent member to monitor the condition of the pool water and to treat with chemicals as required to keep the water as safe as reasonably practical.

A notice is fixed to the back of the pool access door, showing the current state of the water, and advising whether it is safe for swimming or not. Members should pay attention to this notice.

Nobody shall attempt to treat the pool water, or even handle the chemicals unless they have received proper training and have been authorised by the committee.

Extract from SASAC Regulations

J2 Cottonmill Swimming Pool may be used at any time by:-

- a. Suitably Qualified Members, defined as any adult Club Member who holds any of the following qualifications:-
 - BSAC Sports Diver or higher
 - PADI Rescue Diver or higher
 - Royal Life Saving Society Bronze Medallion or higher
 - Any other qualification deemed to be acceptable by the Diving Officer
- b. Members, Guests and Children, while a Suitably Qualified Member is on the premises.
- c. Any other adult Member who has signed the following disclaimer, or a set of Rules/Regulations containing it:-

"I understand that Cottonmill Swimming Pool is not, and cannot be, maintained to modern safety standards, nor is it supervised. I hereby accept the inherent risks and dangers of using the pool, and do so entirely at my own risk." (20/7/09)

Appendix 1 – Pool Signage

THIS POOL IS FOR THE USE OF MEMBERS AND THEIR GUESTS ONLY

THE CLUB DOES WHAT IT CAN TO ENSURE THAT THE POOL IS AS SAFE AS IS REASONABLY PRACTICABLE BUT CANNOT GUARANTEE THAT IT MEETS MODERN SAFETY STANDARDS. PLEASE READ THE POOL SAFETY OPERATING PROCEDURES, ASSESS THE RISKS AND DECIDE WHETHER YOU WISH TO USE THE POOL OR NOT.

ALL CHILDREN MUST BE SUPERVISED

YOUNG CHILDREN MUST NOT BE LEFT UNATTENDED - NOT EVEN FOR A MINUTE

SOLO SWIMMING IS NOT PERMITTED EXCEPT BY WRITTEN PERMISSION OF THE COMMITTEE

NO GLASSES OR BOTTLES ON THE POOLSIDE PLEASE - PLASTIC OR CANS ONLY

SAFETY IS EVERYONE'S RESPONSIBILITY - EVEN YOURS

Appendix 2 - Hire of pool to outside organisations: check-list of points for inclusion in contracts

Information on numbers participating and their swimming skills.

Name of hirer's representative(s) who will be in charge of the group.

Numbers and skills/qualifications of lifeguards to be present during the session; and whether these will be provided by the hirer or by the pool operator.

Hirer to be given copies of normal and emergency operating procedures, and to sign to the effect that these have been read and understood.

Specific agreement on the respective responsibilities of the pool operator and the hirer for action in any emergency. A distinction needs to be drawn between:

emergencies arising from the activities of the group using the pool;
other emergencies (structural or power failures, etc).

Responsibility for the latter will remain with the pool operator who will therefore need to have competent staff in attendance during the hire session.
Any rules of behaviour to be enforced during the session.

Any advice on safety to be given to participants, eg on avoiding alcohol and food immediately before swimming.

Appendix 3 – Solo Swimming (draft)

Having been a member for ... years, I fully understand the risks involved in solo swimming at Cottonmill Swimming Pool. Solo swimming means swimming whilst I am alone on the premises, or with no other person in close attendance on the poolside.

I understand that there will be no insurance in place whilst I am solo swimming.

I acknowledge that as a member of the Club, I am equally as responsible as any other member to do what is reasonably practicable to ensure that the pool and its surrounds are safe.

Under s2(1) of THE UNFAIR CONTRACT TERMS ACT 1977 no one acting in the course of a business can exclude or restrict his liability in negligence for death or personal injury by means of a term in a contract or by way of notice. I therefore agree (having taken legal advice if I consider it necessary) that this agreement between myself and the club of which I am a member, is not made in the course of a business, and therefore UCTA 1977 does not apply.

I agree that I shall not hold the club liable for death or personal injury or loss as a result of any cause including the negligence of the club its directors or its members.

Appendix 4 – insurance stuff

Cloakrooms/Changing Rooms/Equipment Storerooms

Notwithstanding exclusion 6.33 the insurer will indemnify the insured in respect of

damage to property deposited in any cloakroom/changing room/equipment storeroom

owned or operated by the insured except that the insurance granted by this clause

excludes and does not cover:

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a) any amount in excess of GBP10,000 for each and every loss;

b) the first GBP250 for each and every claim;

and provided that the insured complies with the following conditions:

c) an attendant shall be on duty therein throughout the whole of the time the cloakroom is in use or adequately locked if unattended.

d) a disclaimer notice is prominently displayed in or adjacent to the cloakroom/changing room/equipment storeroom.

the use of any breathing gas compressor owned or operated by the insured in connection with the insured's provision of recreational watersports services in the

event that the insured has no other available insurance in place covering the loss;

provided that as a condition precedent to the insurer's liability;

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i) any such equipment under a) or b) above is regularly serviced and maintained in accordance with the manufacturer's guidelines or equivalent practices;
ii) the insured has the appropriate certifications and licences to operate and use any such equipment under a) or b) above and is competent in such equipments use and operation;

Catering facilities - only by permission of the committee (not covered by our insurance)

Appendix 5 – Supervision – Risk Assessment

Under clause 187 of *Managing health and safety in swimming pools*, a risk assessment must be undertaken to decide whether constant poolside supervision is required. As the pool meets the criteria from the list, we note that it is strongly recommended that constant poolside supervision is provided.

However, SASAC is a club whose members are likely to be strong swimmers, and many of the members are qualified in lifesaving. Regulation J2 (see Appendix 3) stipulates that the pool may only be used if a Suitably Qualified Member is on the premises. Although it is noted that this may fall some way short of the recommended supervision requirements (4 to 6 lifeguards), it is considered to be a reasonably practicable alternative. In busy periods, it is probable that the number of users having some form of lifesaving qualification will be far greater than those without.

The highest risk is probably posed by the use of the pool by non-diving members and their guests. The rules are probably adequate in these circumstances, but are not easy to enforce, particularly during the working day when most committee members are at work. The rules at risk of being broken are those requiring a Suitably Qualified Member to be present, and those rules limiting the number of guests per member. It may be necessary to consider video surveillance, but it would not be reasonably practicable to monitor this 24/7. Members found to be in persistent breach of the rules may have their key fob disabled by the committee.

Appendix 6 – Notes for future versions of this document

33. COSHH

39. Fire

50. Members must be aware of the PSOP – how do we communicate this document to ALL members?

Poolside barriers – lifebuoys etc