Annex C to DCS Pol Dir 3.2.20 Dated Sep 19

Risk Assessment

Introduction

1. Each pool and each swimming session must be treated as unique for the purpose of assessing and mitigating for risk in order to ensure safe practice in school swimming. Risk assessment is all about identifying the hazards that could possibly harm people, who might be harmed and evaluating and mitigating these risks. Any significant or serious risks to health and safety must be eliminated if it is possible, but it is also recognised that not all such risks can be eliminated. Health and safety legislation does not expect that work/school/sport/playtime activities will be completely risk free but does require that all significant or serious risks to health and safety that cannot be eliminated are mitigated to a level that is as low as is reasonably practicable.

2. For DCS/MOD Schools, swimming sessions could come under any one of the different types of swimming pool management arrangements e.g. a school may have its own swimming pool that is looked after by a DIO prime contractor or for another school, all its swimming sessions could be held at a public or garrison station swimming pool facility. In all such cases, it is very important that every party involved is clear about what are their responsibilities in ensuring the provision of safe swimming sessions for schools e.g. safe infrastructure maintenance, operation/maintenance of electrical/mechanical systems, water treatment and supervision of swimmers. All the health and safety risk factors in these different functions must be assessed and adequately mitigated by the relevant organisation/person. Where there are areas of shared responsibility, there must be cooperation and coordination between the persons/organisations who share those responsibilities.

The Health and Safety Executive (HSE) are the delegated regulatory authority for health and safety in the United Kingdom and their five-step approach to risk assessment will be used in the guidance given in this annex.

Step1: Identify the Hazards

3. One of the most important aspects of the risk assessment is to identify the hazards. You should take all possible types of hazard into consideration, including any hazards in the pool, its premises and how it is managed by the operator/s– for these hazards, the swimming pool PSOP (NOP & EAP) must be consulted. In addition to this, any hazards related to the swimming activities and any individual or personal factors of those involved in the activities must also be considered.

4. For a typical swimming session, a whole range of hazards may need to be considered which could be physical hazards e.g. slips, trips, falls, diving/jumping into the water, collisions, chemical hazards e.g. excess chlorine in the water causing breathing problems/eye irritation, human factors e.g. inappropriate behaviour and bio-hazards e.g. possible release of faeces/body fluids into the water. These are just general examples and not an exhaustive list of possible hazards and those who are responsible must identify the hazards in their specific situations. An examination of any accident/incident, near miss

reports or ill health records related to previous pool/swimming activities may highlight hazards that need to be considered.

Step 2: Who might be harmed?

5. For every hazard that has been identified, think of who might be harmed and how they may be harmed. This does not necessarily mean identifying individuals by name but identify groups of people who might be affected by each hazard e.g. swimming pool employees, teachers/swimming instructors, students/pupils This will help to identify ways of effectively controlling health and safety risks. Consult those who are at risk e.g. swimming pool employees/lifeguards etc. as they might be able to identify hazards that are not obvious to anyone else and may also have some good ideas as to how the risks can be controlled.

Step 3: Evaluate the risks

6. Having identified the hazards, the people who might be harmed by them and how they might be harmed, it is then necessary to evaluate the level of the health and safety risks resulting from these hazards. The level of a risk is a combination of how likely it is that a person suffers injury or ill health by interacting with a hazard and the severity of the resulting injuries or ill health condition. Having evaluated all the identified risks, they can be ranked so that the most serious risks can be prioritised. The first consideration for all serious and significant risks is whether they can be eliminated, but where that is not possible the general requirement is to protect all people at risk from harm as much as is reasonably practicable. This means that you balance what has to be done in terms of financial cost, time or trouble to reduce risk against the level of the risk i.e. there is no need to take grossly disproportionate action against a low level of risk. The first thing to look at here is what you already have in place to control the risks that you have identified. It may be that you are doing enough already to control your risks, but you may also come to the conclusion that you must do more to reduce your risks to an acceptable level or you could do more to reduce your risks even more than you do already. Any outstanding actions to eliminate or reduce risks that are derived from these findings must be entered onto an action plan with acceptable target dates for implementation and also stating who is accountable to ensure that the actions are completed successfully.

Step 4: Record your significant findings

7. There is great benefit in recording the findings of your risks assessments, and it is a UK legal requirement to record them if you have more than 5 employees. The records must emphasise the risk controls that you have implemented or in the process of being implemented to make your pool swimming sessions safe, as all who are involved need to know what you have in place to keep them safe and what they must do to comply with your safety procedures.

Step 5: Regularly review your risk assessment.

8. As already stated, each pool and swimming session must be treated as unique for the purposes of assessing and mitigating risk but if your assessments cover on-going frequently recurring swimming sessions or events, then it is necessary that these assessments be regularly reviewed to ensure their continued relevance and effectiveness. The following occasions should trigger a review of risk assessments:

- If there are any significant changes to your swimming sessions/events that could introduce new hazards.
- If anyone has good reason to doubt the suitableness of the risk assessment or identifies how it can be improved.
- If anyone (e.g. life guard, teacher/instructor, pupil/student) has spotted a problem that needs to be addressed.
- Any lessons learned from accidents/incidents or near misses.

9. It is also MOD policy that all extant and on-going risk assessments must be reviewed at least annually if none of the above triggers a review over that period.

Further Information

For more general guidance on risk easements, the following guidance is accessible on the internet:

HSE's INDG 163 - 'Risk Assessment'

MOD JSP 375 Part 2, Volume 1, Chapter 8 – 'Risk Assessment'

10. For more specific guidance on assessing risks for the operation and use of swimming pools, the HSE's HSG 179 'Health and Safety in swimming pools' can also be accessed on the worldwide web.