



STA COVID-19 GUIDANCE IN PREPARATION FOR UK SWIM SCHOOLS RE-OPENING POOLS

6th November 2020.
Version 20.16

This best practice guidance, which aligns with the UK government's guidance, has been prepared by STA to give members advice and thoughts around factors they might need to consider and prepare for, ready for re-opening pools.



Foreword

The COVID-19 pandemic has greatly affected the entire world, and we have all had to adapt to this social distancing 'new world'. As a leisure industry we have all been personally affected by the closure of swimming pools as a result of this virus, and now as we start to think about re-opening there are so many important factors to consider, to ensure we re-open swim schools as safely as possible for both staff and customers.

Here at STA, we are busy working alongside our fellow UK aquatic governing bodies and leisure bodies to formulate a Government-approved plan ready for when we can re-open swimming pools. In the interim, while we wait for this to be officially published, we've also been working with our IFSTA partners in the USA and Australia to share knowledge, expertise and best practice ideas.

Today, in response to the many hundreds of members who contact us daily for advice and support on re-opening measures, we have decided to share a compilation of all these combined best practices, as guidance for STA members. The guidance is based on available information at this time, and will be a living document, which we will continually update as and when new information is confirmed by the government.

It is worth noting, that there will be 'no one size fits all' COVID-19 solution, in relation to personal hygiene and social distancing measures for the swim school industry; but while we patiently wait for official government guidance on easing lockdown measures in swimming pools, we hope this 'living' document will help guide STA members and support your re-opening plans and team discussions in the interim – and provide a focus for the key factors to be considered, ready for when we are given the go-ahead to re-open swimming pools and our swim school businesses to the public.

The intended purpose for this document is to cover as many different swim school and swimming lesson scenarios as possible - in line with the information we have to hand at the moment. Please carefully consider the sections from this guidance which applies to your swim school, and determine what control measures are reasonably practicable, and financially viable, for you to implement in order to eliminate or minimise health and safety risks from COVID-19 in your swim school.

By writing this document we want to provide STA members with a decision-making framework that can be used to determine what may be feasible, practical and acceptable for a specific swimming pool facility. To clarify, currently, the government regulations do clearly state that all swimming pools, including indoor, outdoor, private and school pools, are to remain closed until early in July, at least.

We would especially like to thank Brendon Ward and Gary Toner from ASCTA in Australia and Leslie Donovan from Starfish Aquatics in the USA for their support in helping us create this guidance.

Dave Candler – STA CEO

(First published 20th May 2020)

Disclaimer

- In producing this guidance document STA has gathered information from many sources
- Swim Schools must use their own knowledge and best judgment and if in doubt consult the appropriate authorities
- It is up to each swim school to determine if these guidelines will be used as part of their pre-planning operations for re-opening swimming pools
- Using these best practices in no way guarantees that communicable diseases, including but not limited to COVID-19 will not be present in a facility; that people actively infected with communicable diseases might be present in the facility nor does implementation of these best practices guarantee that a person or persons will not contract COVID-19 or other communicable diseases from persons or contact within a facility
- It is important to remember that all plans must comply with “local” public health guidelines which at this time, vary across England, Wales, Scotland and Northern Ireland
- There are a number of links within this document that will assist Swim Schools in keeping up to date with the latest information pertaining to COVID-19. Please note the government are updating guidance regularly, and the web links contained in this document might change.

This position is current as of 6th November 2020.

These best practices must be considered against our remit as a national governing body for swimming and lifesaving.

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Purpose

The purpose of this document is to assist, and offer guidance and points of consideration to swim school owners, managers and coordinators so they can plan to re-open swimming facilities and commence swimming lessons, in line with Government timescales, as safely as possible.

This best practice document is based on available information, and is shared as a guideline only. STA recognises that individual situations will be different and swim schools do not have to open if they are not ready or do not feel comfortable to open or if it's not financially viable.

Our aim is to provide guidance and we expect this will be a live working document that will be updated in line with the latest advice / information from the government as well as industry experts, and as we all learn what is working and what is not. Swim schools must ensure they are reviewing the most up to date version, in order to follow the latest guidance.



Introduction

STA recognises that all swim schools are unique and will operate out of a variety of swimming facilities which all have their own design, remit, equipment, changing facilities, staffing requirements and importantly swimming pool. Most swimming pools will be different in size, design and depth, therefore, not all considerations within this document and within each section will be possible for all swim schools.

The considerations and guidance within this document are to support swim schools when they undertake their risk assessment and to help them make informed decisions regarding the policies and procedures, they put in place to allow them to recommence swimming lessons as safely as possible.

When reviewing the considerations, swim schools will also need to consider the financial implications, as for some considerations it may not be possible to implement.

If a swim school does not own the swimming facility or swimming pool, it is critical that the swim school liaises with the pool manager when looking and finalising options, as well as completing their risk assessment to ensure all parties are aware of the procedures and their responsibilities.

Some considerations will not be possible if swim schools do not own the swimming facility. However, they are there as a guide and to give swim schools possible options or ideas.

Swim schools must review the considerations and determine whether they are possible for their swimming facility. As stated, the implementation of these considerations will depend on the individual swimming facility, pool, location and how lessons are conducted. They are considerations not mandatory requirements.

The current requirements as stated by the Government are:

- Social distancing must be observed throughout the whole process, from entry to the swimming pool facility, changing rooms, during the lessons, post swim changing and exiting the facility
- All people must be 2 metres apart, excluding same household members
- Inform parents / guardians and swimmers that if they or a member of their household have a cold, fever, anosmia or any signs or symptoms of COVID-19 they are not to enter the swimming facility or attend swimming lessons. They should self-isolate for two weeks, therefore, are not permitted to attend swimming lessons for two weeks.

Swim schools must complete detailed risk assessments and ensure all staff are trained on the risk assessment and new policy procedures to ensure the safety of their employees, customers and swimmers at all times.

For the official Government guidance which aligns with this document please visit <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19/providers-of-grassroots-sport-and-gym-leisure-facilities#section-2-1>

Terms of Reference

Please be aware, for the purpose of this document the following terminology has been used throughout.

Terminology	Meaning
Adults	The accompanying adult within the baby, toddler and pre-school swimming lesson.
Adult and child lessons	Baby, toddler and pre-school swimming lessons where the accompanying adult is in the water, supporting the child at all times.
Assistants	Paid or those who volunteer with swimming / aquatic lessons.
Employees	This includes anyone working at the swimming facility, swimming teachers, lifesavers, first aiders, receptionists, café workers, duty managers etc.
Lifesaver	The designated lifesaver on the poolside, they could hold a pool lifeguard qualification or other rescue qualification. This may include a swimming teacher who is also the designated lifesaver on the poolside.
Parent / guardian	The parent, guardian, grandparent, or the person who has legal responsibility for the swimmer(s) and is bringing / taking them for the lesson.
Pool manager	A contact person for the pool who has some responsibility; this may be a duty manager, centre manager, swimming co-ordinator, swim school owner, pool caretaker or pool owner.
Social distancing	People must be 2 metres apart at all times, excluding members of the same household.
Swimmer	The person undertaking the swimming lesson, it could be a child or adult, non-swimmer through to advanced swimmer.
Swimming facility	The building, changing rooms, swimming pool area and pool plant room. This also includes any reception areas or observation areas.
Swimming lessons	This includes baby and pre-school lessons, learn to swim lessons, disabilities lessons and other aquatic activities such as mermaid lessons or artistic swimming within the swimming pool.
Swimming teachers	This includes baby and pre-school teachers, swimming teachers, swimming coaches, aquatic teachers.
Swim school	Includes independent swim school, franchise, council run, leisure centre based or an individual swimming teacher.
Customer service advisor	A nominated member of staff responsible for front of house of duties.

'Should' Where the word 'should' is mentioned throughout the document, it means STA is advising as a recommendation only.

COVID-19 and Pools – is it safe to Resume Activity?

According to the scientific literature, there is no increased risk of contracting COVID-19 from swimming in chlorinated pools, and pool operators adhering to previously set guidelines will control risk from waterborne COVID-19.

Further, the US based Centre for Disease Control and Prevention (CDC) suggests that there is no evidence that COVID-19 can be spread to people through water in pools but individuals need to continue to protect themselves and others both in and out of the water through following appropriate social distancing measures and good hand hygiene practices.

STA recognise that for all swim schools there will be stages of opening before being fully operational – back to 'normal'. Conditions that exist on day one may be different three months later. STA also recognise each UK member country will be in different stages of opening and may have different restrictions based on their situation. When using this guidance document, remember that not all these will apply to your swim school. STA advise you to make use of the parts that are practical, effective and sustainable for your business.

One of the first things to do is appoint someone to be your COVID-19 officer. This person is to make sure someone is following government and health department updates so that you are up to date on the most recent information.

For further guidance on Water and COVID-19 FAQs from the Centre for Disease Control and Prevention (CDC) please visit, <https://www.cdc.gov/coronavirus/2019-ncov/php/water.html>





PRE-OPENING

Responsibilities

In preparation for swim schools to re-open, there are a number of key points to consider, develop and implement.

1. Each Swim School should have a COVID-19 officer responsible for staying up to date government recommendations and any associated changes. This responsibility is important. Consider who might be best placed to undertake the specific tasks of updating policy and procedures, staff training, customer updates etc. **STA has created a free COVID-19 Officer Awareness Training CPD, which is available here <https://www.safetytrainingawards.co.uk/online-learning/miscellaneous-programmes/covid-19-officer-awareness-training/>**
2. Update or create a new operations manual that reflects the changes made COVID-19. Or you might want to create supplemental 'live' set of guidelines that complement and in some areas supersedes for specific COVID-19 related procedures - depending on your facility this might be quicker to produce and easier to keep up to date. Ensure it is all in writing and set your policies and expectations including any adjustments to your staffing
3. Develop, implement, monitor and continually review your risk assessments (see page 12)
4. Update HR policies related to sick leave resulting from COVID-19 related illness / infection
5. Consider if you want to change your policies and waivers to include infectious diseases. Consult with your solicitor if you decide to add to your policies
6. Communicate with staff and customers related to reopening and the 'new normal' – using 'confidence-building' and reassuring messages in relation to safety. This might also include swim schools creating a video for customers on their smart phone to show the pool facility and the changes that have been made, which can then be published on a company website or via social media, for reassurance purposes
7. Staff training:
 - a. All staff should undertake COVID-19 training* and be updated with changes to operation policy and procedures such as class sizes, teaching methods, PPE, cleaning protocols, health questionnaires, reporting, entry exits, social distancing, etc
 - b. Staff should be given educational materials pertaining to COVID-19 for themselves, customers, and the swim school. CIMSPA have several, free illustrated resources that can be downloaded here <https://www.cimspa.co.uk/library-and-guidance/coronavirus-cimspa-briefings/reopen-sport-and-physical-activity-sector-facility-reopening-guidance>
 - c. Ensure everyone is on the same page and consistent. Explain the how and why. Now is a good time to set up a staff group to work through how this will be implemented.
8. Calculate the size in each area - refer to page 39 for guidance on determining maximum capacity

9. Survey your families before opening to gauge customer sentiment before reopening – such questions could be:
 - a. Will customers recommence swimming lessons straight away? If not, why?
 - b. What do customers see as the most important social distancing / non transmission initiatives?
 - c. Do customers know / care about the COVID-19 virus not being able to survive in chlorinated water?
 - d. Whether returning to lessons or not, what is our customer's primary concern?
10. Before recommencing lessons, encourage all swimmers and their parents / guardians to download the Government's COVID tracing app to assist in tracing cases and notifying impacted individuals.

***FREE Training resources**

Starfish Aquatics CPD, this one is US based, but there is a section specifically for Aquatics www.bit.ly/in-service-covid-19

<https://www.who.int/emergencies/diseases/novel-coronavirus-2019/training/online-training>

<https://www.virtual-college.co.uk/courses//prevent-covid-19-free-training>

<https://www.skillsforhealth.org.uk/covid-19-course>



Risk Assessments

Swim schools should develop, implement, monitor, and continually review their risk assessments including within them, the potential of someone being exposed to COVID-19.

Swim schools should consider a specific risk assessment for each of the activities it offers within the swimming facility, for example, baby and pre-school lessons, learn to swim lessons, adult lessons, mermaid swimming, artistic swimming, junior lifeguard sessions.

Where swim schools do not own the swimming facility, consultation with the pool manager will be required.

Free learn to swim risk assessment templates - To provide further practical support for swim schools and pool operators, STA commissioned Right Directions to write COVID-19 risk assessment templates specifically for learn to swim programmes, which are free to download here: <https://online.sta.co.uk/login>

For risk assessment guidance and examples please visit: <https://www.hse.gov.uk/risk/casestudies/>

Our partners' Right Directions have also created a comprehensive 'COVID-19 Risk Assessment Template Re-opening' toolkit here <https://www.cimspa.co.uk/download.aspx?f=379>

Further advice on risk assessments can also found at [Right Directions](#)

Key considerations when undertaking a risk assessment, but are not be limited to, the following:

- What is the latest government advice (for each UK member country) and advice from industry experts on control measures?
- What is the current advice from the NHS about the current situation and numbers for COVID-19 cases in the local community / region?
- What are the current legal requirements / advice from the government (e.g. public health orders, health directions, business requirements) for swim schools and swimming pools?
- Does teaching swimming, running a swimming facility etc increase the risk of employees and customers being exposed to COVID-19? We must always assume the answer is yes
- Does teaching swimming, running a swimming facility etc require regular and close contact between employees and / or customers?
 - Can adaptations be made to reduce the close contact work, such as teaching from poolside, reducing the amount of people on poolside?
 - Am I working in a high-risk environment (e.g. with vulnerable people)?

- Does the swimming facility have hand washing and / or hand sanitising facilities?
 - Are these sufficiently stocked and in good working order?
 - Can more stations be set up at various points around the facility?
 - Will the swim school need to provide these?
- Does the swimming facility and lesson delivery increase the risk of employees and / or customers being exposed to COVID-19 and can this be changed?
 - What is the size of the swimming pool, poolside and changing rooms, can numbers within a lesson be reduced to ensure social distancing?
 - How many swimming teachers / lessons are running at once?
 - How many employees are needed per shift to safely operate the swimming facility?
 - Are there restrictive entry / exit points or high contact points, such as doors, handles etc? If so, what steps can be taken to reduce the risks at these points, leaving doors open, alternative entry and exits, regular cleaning?
 - Can modifications be made to enable increased social distancing?
- Review the emergency action plan including evacuation plan. Consider social distancing if the swimming facility and swimming pool needed to be evacuated?
- Are there employees who are classed as a vulnerable person?
 - Vulnerable people include: People over 70 years old, people with health conditions and pregnant women
 - If there are vulnerable people employed within the swimming facility, a risk assessment must be undertaken including consideration of the characteristics of the employee, the workplace, and the work. Seek medical advice as needed and keep information about an employee's medical conditions confidential.
- Do HR policies need to be updated related to sick leave resulting from COVID-19 related illness / infection?
- Guidance on testing to be confirmed by the government
- What are the current cleaning, sanitisation and disinfecting arrangements?
 - Are they consistent with government guidance?
 - Are there, or is there access to, sufficient and appropriate cleaning supplies, including disinfectants?
 - Have frequently touched surfaces been identified and cleaned?
 - Is there a regular documented cleaning schedule?
 - Are there allocated staff for cleaning? Have the staff been upskilled for the new cleaning procedures?

**Consider using
a Health
Questionnaire
with swimmers
and staff.**

**[CLICK HERE FOR
TEMPLATE](#)**

- How prepared is the swimming facility if there is a case of COVID-19?
 - Do employees and customers understand the need to stay home if they are unwell, even if they think an illness is minor?
 - Has a plan been established, and employees trained about the processes they must follow if COVID-19 directly effects the swimming facility (e.g. an infected person has been on site)?
 - Is there a policy on make-up lessons if a swimmer cannot attend lessons due to COVID-19 symptoms or if the facility needs to close for a 'deep clean' resulting from a COVID-19 infection?
 - Are all employees' and customer contact details and emergency contacts correct?
 - Are there records which will allow employees and customers who were in close contact with the infected person to be quickly identified?
 - Have employees been trained about COVID-19 including how areas may need to be cleaned and disinfected in the event of any contamination and other risk controls?
 - Are employees fearful of being at work?
- Do the planned changes or changes arising from COVID-19 change the risk?
 - Do the changes which are being planned for COVID-19 increase risks or introduce new risks which need to be controlled?
 - Are there other things changing that might increase risks, such as upset customers, increased demands or shortage of safety supplies?
 - Are there processes in place to identify and respond to any other risks that arise once changes are implemented?
- Is there a plan to review control measures to ensure they are effective?

Insurance

Please check with your insurance company prior to opening to ensure your swim school is complying with Government and industry guidelines - and only reopen when told you are allowed to.

Specific risk assessments for each activity should consider, but are not limited to the following (further information detailed later in this document):

- The social distancing of parents / guardians to other parents / guardians, swimming teachers, assistants, and swimmers in the water
- The social distancing of swimmers to other parents / guardians, swimming teachers, assistants, and swimmers in the water
- The social distancing of parents / guardians to other parents / guardians, swimming teachers, assistants, lifesavers and swimmers on poolside
- The manual support requirements in order to support a swimmer within the water
- Ratios if swimmers are unable to touch the floor and the swimming teacher is not in the water
- Swimmers ability to manage their own hygiene such as wiping their nose
- Sharing of teaching equipment from one lesson to another.

A photograph of a modern building's interior, likely a lobby or reception area. The space is characterized by vibrant blue walls and a matching blue ceiling. The floor is a polished, reflective blue surface. In the foreground, there are several modern, chrome-framed chairs with blue seats. To the right, a round table is partially visible. The background shows a large glass wall or window, through which bright light is streaming, creating a high-contrast scene. The ceiling features a series of long, horizontal, white slatted panels that add to the architectural complexity. The overall atmosphere is clean, bright, and contemporary.

ENTERING THE BUILDING – CAR-PARK, FRONT DOOR & LOBBY / RECEPTION AREA

For customers and visitors entering and exiting the swimming facility:

Swim schools need to ensure social distancing is maintained when entering and when exiting the swimming facility. Consideration needs to be given to the amount of people who will be entering and exiting at the same time, for example are the doors large enough for social distancing to be maintained and are there possible ways to reduce this number or divert traffic into different areas.

Remember: if a new exit location out of the facility for swimmers has been created – or doors modified – these areas must be continually monitored to prevent children and / or other adults entering unnoticed or unauthorised.

General Considerations:

- Install signage in the car-park to inform parents / guardians what to do. Is it one way in and another way out (for swim schools renting pool sites, speak to the pool owner)
- Be clear and consistent about your policy and processes to all swimmers and their parents / guardians - post appropriate signage around the facility
- Minimise touch to enter the building – how can you limit touchpoints and how are you cleaning them and how often
- Install hand gel / hand washing facilities on entry and exit of the facility, requirements for every person entering and exiting to wash their hands. This may require a touchless hand sanitiser dispenser at entry / exit locations or a customer service member pumping sanitiser for customers
- Implement entry through one door and exiting from another door, possibly at a different location in the building. If it is possible and safe to do this, entry and exit points could be through fire doors directly to changing rooms to reduce the amount of people walking through the swimming facility
- Introduce barrier queues for entry on one side and barriers (using cones / barriers / chairs with ropes) for exit on the other side, to ensure one-way traffic upon entry and exit, this could also be continued through access corridors to changing rooms.
 - a. Make sure any surface markings on these 'new routes' have non-slip coating
 - b. Have arrows to guide people on maintaining safe distances and how to get into the pool if you have changed traffic patterns. If using stickers / decals on the floor, make sure they have a nonslip coating.

- Parents / guardians and swimmers should arrive as close as possible to their lesson start time, they should not arrive too early to try and reduce the amount of people within the facility
- Parents / guardians and swimmers should be encouraged to leave the facility after swimming, they should not congregate in the facility or changing areas after swimming
- Consider only allowing one parent / guardian per child into the building
- Ask families to wait in their cars until just before time to enter for their lessons
- Text parents / guardians to be ready to pick up swimmers from the front entry area
- Require swimmers to arrive in their swimsuits
- Include signage about proper hand washing technique near all toilet facilities and hand washing stations
- If you implement temperature checks, consider who will administer them and ensure they know and comply with regulations
- Consider if front desk / customer service members need a safety screen now. Consider minimising the number of those working in this position as you may have fewer customers in the building. Can you redirect calls to phones that are not customer facing? An alternative is to place an additional table or chairs in front of your front desk so that customers are at least 2m away from customer service team members
- Post signage if you are going to ask those who have shown symptoms to not enter your building. This signage to include the screening questions you are using and a sign for maximum occupancy - leave the actual number blank so you can change it over time.



Educate

Symptoms of COVID-19 can range from mild illness to pneumonia. Some people will recover easily, and others may get very sick very quickly. Most people with coronavirus have at least 1 of these symptoms:

- **A high temperature** – this means you feel hot to touch on your chest or back (you do not need to measure your temperature)
- **A new, continuous cough** – this means coughing a lot for more than an hour, or 3 or more coughing episodes in 24 hours (if you usually have a cough, it may be worse than usual)
- **A loss or change to your sense of smell or taste** – this means you've noticed you cannot smell or taste anything, or things smell or taste different to normal

Symptoms of COVID-19 can range from mild illness to pneumonia. Some people will recover easily, and others may get very sick very quickly. People with coronavirus may experience symptoms such as:

- Fever
- Coughing
- Sore throat
- Shortness of breath
- Loss of taste or smell
- Temperature above 37.5°C
- Fatigue
- Unusual muscle aches and pains
- Diarrhoea.

For swimming teachers / swim school staff entering and exiting the swimming facility:

General Considerations:

- Ask swimming teachers / swim school staff to arrive for their shift in uniform
- Ask swimming teachers / swim school staff to bring minimal personal items - if possible, only a towel and water bottle
- Consider having a secure lock box for car keys / valuables with limited access
- Suggest that swimming teachers / swim school staff leave additional personal items in vehicles or at home
- Appointed 'customer service staff' could meet other swimming teaching staff at the front door and open the door to decrease touch points, while maintaining 2m social distance rules
- Appointed 'customer service staff' could ask the following questions of each swimming teacher / staff member (This could be done on a mobile phone as a form or questionnaire and filed for reference as part of your risk assessment policy).

Current COVID-19 related government restrictions as they apply to everyone are anyone who has:

- Travelled overseas and returned to the UK in the past 14 days from a country outside the common travel area – for the latest information visit <https://www.gov.uk/guidance/coronavirus-covid-19-travel-corridors>
- Been in contact with a confirmed case of COVID-19 in the past 14 days?
- Any symptoms or signs of COVID-19 (as above)?

If the answer to any of these questions is yes, it is highly recommended the swimming teacher goes for a test and provides a copy of the result before allowing them to return to work.

It is recommended that swimming teachers who have been tested positive for COVID-19 show proof of full recovery before returning to work (swim school).

Swimming teachers / swim school staff must notify their manager that they will not be able to work. This will lead to a better sense of safety for those at the swim school. It will cut down on those who could carry the virus. It is not absolute. It is a further layer of protection.

- Install a hand sanitising station at the front door for all swimming teachers / swim school staff entering the facility to use
- Consider how swimming teachers / swim school staff 'clock in / out' for shifts (try to be hands free). If not possible then sanitising wipes should be provided to wipe down the time clock device or laptop. Wipe down the device, clock in and then wipe down the device again
- Everyone entering the pool area should use hand sanitiser or wash their hands before teaching classes
- If swimming teachers / swim school staff are using lockers they should be wiped down before and after use. It is recommended minimal personal objects be brought to the pool
- Think through how work rotas and class rolls will be communicated. Can they be sent by text or emailed in advance?

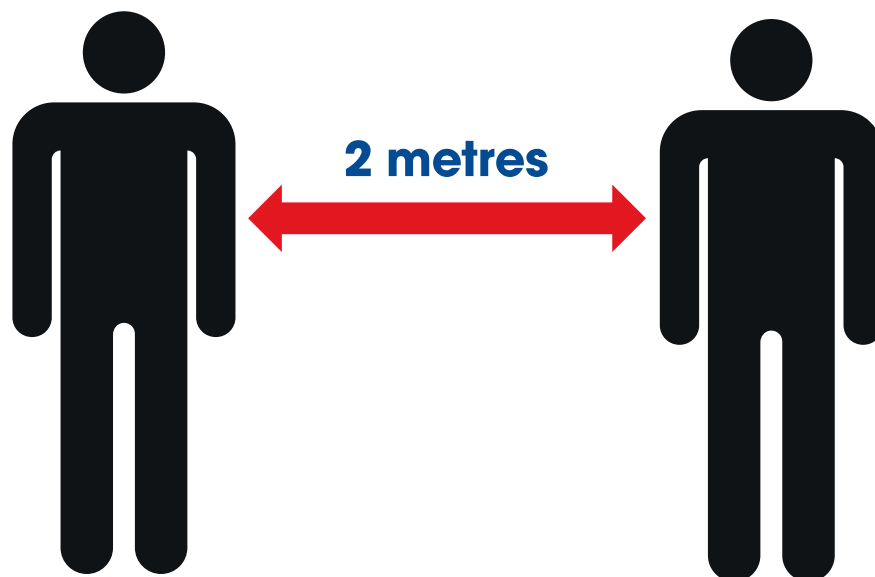


For customer service staff entering and exiting the swimming facility:

General Considerations:

A customer service officer could:

- Greet customers at the front door and open the door, to decrease touch points while maintaining 2m social distance rules
- Confirm questions posted at front door by asking visitors directly (if not answered online prior to each lesson) and confirming they are safe to enter and swim
- Manage the hand sanitiser station at the front door for everyone who enters to use or dispense
- Confirm correct / updated contact information for all customers entering the building so you can contact everyone in the event you need to notify them of a confirmed case. Keep accurate records of who is in the building at what day / times
- Serve as a point of contact in support of signage at entry points as listed previously
- Monitor & recommend that those not taking part in swimming activities, i.e. parent / guardian spectators, should wear a face covering whilst in the facility [https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own](https://www.gov.uk/government/publications/face-coverings-when-to-wear-one-and-how-to-make-your-own/face-coverings-when-to-wear-one-and-how-to-make-your-own)



NHS Test and Trace Service

It is now mandatory for organisations to keep a temporary record of customers and visitors for 21 days in order to assist the NHS Test and Trace service should there be a confirmed case of COVID-19. The information should be gathered in a way that is manageable for your organisation, in order to assist with NHS Test and Trace's requests for that data if needed. Collect sufficient data on each attendee (name, home phone number, mobile number, date and time of entries and exit) so that each person can be contacted if there is a case of COVID-19 connected to your organisation.

ENGLAND & WALES

On 24th September 2020, the government launched a new NHS COVID-19 app in England and Wales, which includes a QR check-in at venues.

In support, the government has stated that each venue (including leisure facilities) **MUST** display an NHS QR code poster(s) by law at the entrance point so customers who have downloaded the new NHS COVID-19 app can use their smartphones to easily check-in <https://www.gov.uk/create-coronavirus-qr-poster>. Please note, it should be the venue owner / operator that is registered for the NHS QR code rather than individual swim schools, as there may be more than one swim school hiring the pool. However, if the owner / operator hasn't done it, or refuses to, STA strongly advises swim schools to register it themselves.

SCOTLAND

Scotland is using a different app-based system, called Protect Scotland, which uses blue tooth technology <https://protect.scot/>. In order to support NHS Scotland's Test and Protect service, sport and leisure facilities/businesses must gather and safely contact information from general public, members and staff. <https://www.gov.scot/publications/coronavirus-covid-19-guidance-on-sport-and-leisure-facilities/pages/workforce-planning/>

NORTHERN IRELAND

In Northern Ireland, like Scotland, they use a StopCOVID NI app and sport and leisure facilities/businesses must gather and safely maintain contact information from general public, members and staff <https://www.publichealth.hscni.net/covid-19-coronavirus/testing-and-tracing-covid-19/stopcovid-ni-contact-tracing-app>

FAQ: What if one of my swimmers has been in contact with a person who has tested positive for COVID-19?

The NHS guidance here can be used to guide customers who have officially been informed, i.e. by their school, nursery or another sports club, that their child has come into contact with someone who has tested positive for COVID-19 or who is showing symptoms <https://www.nhs.uk/conditions/coronavirus-covid-19/testing-and-tracing/nhs-test-and-trace-if-youve-been-in-contact-with-a-person-who-has-coronavirus/>

Please note, it is your customer's responsibility to follow the steps required, be it self-isolating* or organising a test, and the government's Test and Tracing team will then do the rest.

Swim schools do NOT need to do anything unless contacted by the Test and Trace team, who will then advise on the next course of action. This is because the Test and Trace team seem to only have concerns (at the moment) if there are more than 2 confirmed cases from the same venue.

For further detailed guidance on when to self-isolate and what to do please visit <https://www.nhs.uk/conditions/coronavirus-covid-19/self-isolation-and-treatment/when-to-self-isolate-and-what-to-do/>

FAQ: How to differentiate symptoms – is their advice available for parents?

Also, as we approach the winter months, differentiating cold, flu and COVID-19 symptoms will be difficult and a helpful guide was published by the BBC for reference <https://www.bbc.co.uk/news/health-54145299>

RULE OF '6'

From 21st September, hospitality venues – including leisure venues - in England are also legally required to enforce the rule of 6 or face a fine of up to £4000 <https://www.gov.uk/government/news/venues-required-to-enforce-rule-of-6-nhs-qr-code-posters-and-contact-logs>

Please note, the rule of 6 does not yet apply to organised sports, such as swimming lessons, it only applies to social swimming in order to prevent more than 6 people socially attending the venue.



PHYSICAL CONSIDERATIONS FOR SWIM SCHOOL FACILITIES

Overview

Each swim school is unique and regardless the size of the swim school, swimming facility, number of staff employed or whether the swimming facility is hired or owned by the swim school, they all have a duty of care to ensure the safety of employees, customers and swimmers at all times.

The swimming facility includes all areas of the building, such as changing rooms, poolside, reception area, access corridors, café, pool plant room, and observation areas.

In all areas:

- Review and where necessary update your Normal Operating Plan and Emergency Action Plans to include the potential of someone being exposed to COVID-19
- Review the emergency evacuation plan. Consider how social distancing can be maintained if the swimming facility and swimming pool needed to evacuate
- Have a detailed emergency action plan procedure in place to deal with a contamination of fluids such as sick or blood to ensure the area is disinfected thoroughly. All staff must be trained on this procedure.



Social Distancing in the Workplace

Social distancing must be maintained in the leisure facility wherever possible.

Where the social distancing guidelines cannot be followed in full in relation to a particular activity, organisations should consider whether that activity needs to continue for the organisation to operate, and, if so, take all the mitigating actions possible to reduce the risk of transmission between their staff.

Mitigating actions include:

- Further increasing the frequency of hand washing and surface cleaning
- Keeping the activity time involved as short as possible
- Using screens or barriers to separate people from each other
- Using back-to-back or side-to-side working (rather than face-to-face) whenever possible
- Reducing the number of people each person has contact with by using 'fixed teams or partnering' (so each person works with only a few others).

Social distancing applies to all parts of an organisation, not just the place where people spend most of their time, but also entrances and exits, break rooms, canteens and similar settings. These are often the most challenging areas to maintain social distancing.

Lobby / Reception Area

General Considerations:

- Markers denoting 2m social distancing should be placed on the floor in front of the front desk. A sign should be located at the end of the line communicating that if all the floor markers are occupied please wait outside until there is a marker spot available
- The marker directly on the floor in front of the front desk should be placed 2m back
- Consider installing a protective shield between customers and swim school staff. You can also utilise a table, chairs or similar in front of the front desk to create a physical barrier. The goal is to create 2m of separation
- If chairs are in this area, consider reducing the number. Consider marking where chairs go by using tape on the floor to denote 2m. If chairs do not move, consider signage and tape on chairs to mark social distancing. If there are benches, then perhaps one family per bench or a staggering so that no one is too close together
- All shared items should be removed from the front desk. This include pens, flyers, business cards etc. Every swim school member should have their own supply of these items. If pens are required, wipe them before and after use. Anything touched by our hands should be sanitised
- Hand sanitiser should be provided throughout a facility
- Water fountains should be placed out of order. Guidance from your local health department may be needed if they require them to operate. The water itself is not the issue, rather touching the button or bar to make water come out. Putting your face near a surface that could contain the virus could be overcome with disposable cups and wipes to use to operate drinking fountains. Be sure to provide a rubbish or recycling bin if using this option
- Consider eliminating lost and found. Especially for clothing items. Do not shake any towels or clothing items as this could put the virus in the air
- Be aware that customers may be very sensitive to hygiene for some time and anything that looks messy could translate to unclean in their minds.

Lobby / Reception Area – Customer Flow

General Considerations:

- If your procedure is for a parent / guardian to accompany a swimmer into the pool, only have one parent / guardian accompany each swimmer to their swim lesson and request swimmers arrive dressed for lessons
- Ask parents / guardians to arrive within five minutes of the scheduled class time. If they arrive early ask them to wait in a designated (inside or outside) area depending on the layout of the facility in accordance with 2m social distancing rules
- Once swimmers enter the facility they could sit in the lobby and wait at a seat with their parent / guardian until called by name to enter the pool area
- Customer Service staff could call swimmers to their class, hold doors open for swimmers and direct them to their classes. Consider ways to create one-way traffic on pool deck to avoid swimmers crossing each other's path. Alternatively, schedule breaks between classes or stagger start times.
- At the end of class, a parent / guardian could return to the door that the swimmer entered the pool area to retrieve their child. Consider marking the floor to indicate where they should stand to ensure they are 2m apart
- No interaction between swimming teacher and parent / guardian should occur. Swim Schools will need to determine how to manage communication with parents / guardians during this time. Consider text, email, and social media options.

Lobby / Reception Area – Chairs and Tables

General Considerations:

- All seating in the lobby / reception area will be adjusted to comply with social distancing guidelines. They should be monitored. Family groups can sit together but enforce social distancing for all others
- Chairs and tables should be sanitised on a regular basis. Customers should see these measures and be educated on them. After each family or customer leaves, the tables and chairs that were occupied should be sanitised. Provide sanitising wipes and paper towels for those who want to wipe down their own chairs. Provide rubbish bins for used wipes and towels and remove waste frequently.

Lobby / Reception Area – Play Areas

General Considerations:

- Remove all small toys and close the play area
- Maintain a cleaning schedule of this area until approved to open within the social distancing guidelines.

Lobby / Reception Area – Snack Bars and Drinks

General Considerations:

- Retail displays should be moved to avoid multiple touch points by customers and staff
- Consider creating an online store or only allow customer service staff to touch these items
- If you sell food, you could limit food to only pre-packaged foods or redirect to vending machines
- Decide how you will handle it if someone wants to try on a swim costume or clothing merchandise. Do you have a policy on returns?
- Touch areas of vending machines should be part of your cleaning process or consider removing your vending machine completely.

Lobby / Reception Area – Swim School Staff

General Considerations:

- Swimming teachers should maintain 2m social distancing and a hand washing / sanitising regimen in this area. They should spend little time here and minimise conversations with colleagues and customers
- Customer Service staff: review physical considerations as above. The goal is to protect everyone in your facilities. Remind and enforce social distancing. You can do this by:
 - Using physical barriers
 - Consider only allowing credit / debit card transactions if your software will do this. Consider not allowing cash transactions for the time being
 - Minimise paper forms. Try to convert to electronic and have them fill out on their own devices. Remember if you still must use clipboards or pens those should be sanitised before and after each use. The same applies to electronic devices such as electronic tablets – sanitise after every use or provide an individual cover for each user
 - Assign each person their own station. Clean the station before and after each shift. Wash hands at intervals throughout the shift.
- Consider implementing a no 'walk-ups' policy if applicable and inform customers to only visit if they have a booking.

IN ALL AREAS YOUNG SWIMMERS SHOULD BE TOLD TO AVOID TOUCHING ANY UNNECESSARY SURFACES WHERE POSSIBLE.

Changing Rooms

The type of changing room and size of the changing room will greatly impact the procedures swim schools will need to put in place. Individual changing cubicles create a barrier around the person getting changed, however individual changing cubicles have a high contact risk as the door handles, doors, sides and bench are touched often. Whereas, group changing or open space changing have less high contact points, dependent on their size will reduce the amount of people who can change within them whilst maintaining social distancing. Swim schools may have to stagger lesson timing, reduce lesson sizes, limit the number of parents / guardians bringing and picking up a swimmer, in order to maintain the social distancing safety rules within the changing rooms.

Considerations:

- Entrance into the changing rooms through one door and exit via a different door to reduce traffic flow
- Limit the number of swimmers and parent / guardians within the changing rooms
- Clean the changing rooms / cubicles after every lesson set or have a designated person within the changing rooms to consistently clean the area / floor
- Stagger the lesson times when there is more than one lesson occurring at once, to help reduce the amount of people in the changing rooms and allow for cleaning time in between lessons
- Hand gel / hand washing facilities on entry and exit of the changing rooms
- Asking swimmers to arrive in their swim wear before attending the lesson, wearing appropriate clothing over the top
- As the warmer weather approaches, asking swimmers to dry towel and put appropriate clothing on over their swim wear before leaving. For example, a dressing gown or onesie over the wet swimming costume to reduce the number of people within the changing rooms
- Consider areas that can be converted into additional changing facilities for swimmers or invest in additional changing areas such as marquees / portacabins for example
- Ensure there is a set procedure in place for regular toilet checks to ensure they are stocked of hand towels, toilet roll and soap
- Encourage swimmers to shower at home to reduce the amount of time and traffic in the changing rooms
- Provide body wash and soap within the showers
- Swimwear dryers, hairdryers and hand dryers should not be used – switch to paper towels and ensure you have enough rubbish bins which are emptied often
- For baby-changing, with space permitting, consider baby mats which can be rotated through a cleaning procedure after each use, or encourage parents to bring their own
- Set a prescribed time for each lesson to change, if someone is late, they need to wait for the next slot to change, in order to control the amount of people in the changing rooms at one time
- Advise swimmers / parents / guardians / swim school staff to not shake any towels or clothing items as this could put the virus in the air.

Poolside Including Observation Area

Social distancing must be maintained on the poolside and the observation area throughout the changeover of lessons and during swimming lessons. Parents / guardians must be made aware of this before attending lessons. To ensure social distancing, parents / guardians may not be permitted onto poolside during lessons and swim schools will need to ensure they have a set procedure during changeovers to ensure this is maintained.

The lifesaver on the poolside will also have to maintain social distancing to the swimming teachers and spectators on poolside. **The lifesaver should not be responsible for ensuring people maintain social distancing, they are responsible for supervising the swimming pool and safety of the swimmers.**

Considerations:

- Limit the accompanying parent / guardian to one person per swimmer
- Not permitting any parent / guardian on the poolside during swimming lessons
- Where possible, not allowing siblings of swimmers who are not within a swimming lesson to attend the facility or poolside
- Staggering the lesson time to reduce the amount of people on poolside during a changeover
- Reducing the lesson length to include a safe changeover time
- Designated areas on poolside for specific lessons, with social distancing markers to stop cluster gatherings on poolside
- Hand gel / hand washing facilities on entry and exit of the observation area
- When on poolside or observation area, parents / guardians should cover their face with a face mask / covering
- If furniture is available on poolside or in the observation area, ensuring this is spaced 2 metres apart and cleaned regularly.



FACILITY SAFETY STANDARDS



Cleaning

Swim schools should create detailed cleaning, sanitising and disinfection schedules and cleaning sign off sheets which can be signed once an area has been cleaned. The cleaning sign off sheets should state; the area cleaned, time cleaned and by who.

The cleaning, sanitising and disinfection schedules should include the area to be cleaned, what product / chemical it should be cleaned with and how often it should be cleaned.

The cleaning, sanitising and disinfection schedules should cover, but is not limited to, the following:

- Changing rooms including furniture and surfaces within the changing rooms or cubicles
- Showers
- Hand gel / hand washing stations
- Toilets
- Handrails
- Door handles
- Lockers
- Poolside
- Pool equipment including lifesaving equipment
- Swimming teaching equipment
- Observation areas including any tables or chairs within this area
- Reception area
- Entry and exit barriers / gates.

Please refer to Government guidance here <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings#left-area>

For cleaning, sanitisation, disinfectant advice for all pool and swimming teaching equipment, consult with the manufacturer and always follow the latest Government advice <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings#left-area>

Additional Cleaning Considerations:

- Toys used within swimming lessons must be cleaned and sanitised regularly, after each lesson (in-between uses) - as per the government's guidance – in line with your normal cleaning and sanitising procedures, or submerge the toys in the pool. At the end of the day, STA would then recommend full disinfection takes place, where the toys are cleaned, sanitised, disinfected, rinsed and dried ready for the next day. Following a confirmed case of COVID-19, follow government guidance which states you must immediately **CLEAN, SANITISE, DISINFECT, RINSE & DRY.** <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings#left-area>
- Ensure those who are responsible for cleaning are provided with the appropriate cleaning equipment, chemicals and Personal Protective Equipment (PPE)
- Ensure all cleaning chemicals are stored and labelled correctly
- Ensure staff are trained on the safe use of cleaning chemicals
- Ensure there is adequate personal to maintain the cleaning of changing rooms, poolside and equipment during lessons.

'CLOSED CELL' EQUIPMENT: Pool equipment confirmed by the manufacturer to have a 'closed cell' structure, i.e. pool noodles constructed from polyethylene foam, prevent moisture absorption and can be cleaned after each session using your normal cleaning regime, or dipped in the chlorinated pool for 30 seconds and left to dry. At the end of the day, STA would then recommend full disinfection takes place, where the equipment is cleaned, sanitised, disinfected, rinsed and dried ready for the next day.

CLEANING: the removal of visible soil, debris, micro-organisms and organic substances from surfaces; will not eliminate germs but reduces their numbers by removing some contaminated matter. Cleaning is just the first step in a complete decontamination process, but it's a step you can't skip. Even if you intend to sanitise or disinfect the area, cleaning away visible soil, dust or debris beforehand makes it easier and more effective to remove microscopic germs with more intensive methods later. Cleaning is typically done using clean water in combination with a universal detergent.

SANITISATION: the reduction of bacteria to safe levels (set by public health standards) to decrease the risk of infection; may not kill all viruses. A step beyond cleaning, sanitisation kills a greater number of bacteria. The CDC explains that "a sanitiser is a chemical that kills 99.999% of the specific test bacteria in 30 seconds under the conditions of the test." An example would be Milton's Sterilising Tablets or Fluid <https://www.milton-tm.com/en/consumer/covid-19-guidelines>

DISINFECTION: the elimination of pathogens and disease-causing micro-organisms, except bacterial spores. Disinfection is a stronger decontamination method because of its ability to destroy pathogens.

Pool Water Testing

It is vital that the pool plant room is maintained by a competent person and the water is regularly tested to ensure chlorine and pH levels are within the normal pool limits.

For guidance on pool water testing only, STA recommend swim schools refer to PWTAG, <https://www.pwtag.org/>





PHYSICAL CONSIDERATIONS FOR THE POOL

The Teaching Environment

The primary risks within the lesson environment are:

- a) Transmission of virus swimmer to swimmer;
- b) Transmission of virus swimmer to swimming teacher ;
- c) Transmission of virus swimming teacher to swimmer;
- d) Transmission of virus from swimming aids to swimmer / swimming teacher.

Factors that exacerbate this risk are:

- a) Swimming teacher manually assisting swimmers to achieve drill / skill progression exposing themselves face to face with the swimmer;
- b) Swimming teachers continuing to work while displaying symptoms that could in fact be the COVID-19 virus;
- c) Swimmers attending lessons while displaying symptoms that could in fact be the COVID-19 virus;
- d) A-symptomatic swimmers and / or swimming teachers spreading the COVID-19 virus through close contact;
- e) Swimmers coughing, sneezing, heavily breathing on or around others in the lesson possibly transmitting the COVID-19 virus.



The General Teaching Environment – Guidance Strategies

Swimming lessons involve different age groups, teacher ratios and they all require different teaching strategies - from baby and pre-school lessons to learn to swim, adult and disabilities lessons in addition to activities such as mermaid lessons, junior lifeguard or artistic swimming within the swimming pool.

Social distancing must be maintained by swimmers in the water and the swimming teacher. Swim schools will need to work out the number of swimmers they can have within the swimming pool whilst maintaining social distancing. Depending on the size of the swimming pool, it may require lesson sizes to be reduced.

Due to the variations in pool sizes, shapes, depths and the swimmer's abilities, swim schools may be unable to apply one approach to all lessons or all pools they deliver within. Swim schools will need to look at each lesson and the pool it operates from, review the considerations, risk assess and then apply the appropriate considerations for that pool.

In order for social distancing to be maintained it may not be possible for swimming teachers to teach from within the water or assistants to be within the water. Swim schools will need to review the pool depth, swimmer ability, type of swimmer (adult, child or baby and pre-school) and if there is any additional provision this can be put in place..

Swimming lesson delivery may mean swimming teachers are working in close contact and may at times be within 2 metres of a swimmer, for example if teaching from within the water. Working in close contact increases the risk of a swimming teacher and swimmer being exposed to COVID-19.

Swim schools must consider whether the task must be completed or could be adapted. If the task must be completed and the swimming teachers will be in close contact, a risk assessment must be undertaken to determine what control measures are reasonably practicable in the circumstances to eliminate or minimise health and safety risks from COVID-19. If in doubt, always refer to the Government's latest guidance on 'Working Safely During COVID-19' <https://www.gov.uk/guidance/working-safely-during-coronavirus-covid-19> which quotes: "You must maintain social distancing in the workplace where possible".

The preservation of human life will always take priority over social distancing. Therefore, if a swimmer is in difficulty, the lifesaver / swimming teacher must respond quickly and where required.

General Considerations:

Equipment

- Remove, where possible, all toys, kick boards and teaching equipment until safe to use again
- If equipment is used, it must be cleaned and sanitised regularly, after each lesson (in-between uses) as per the government's guidance using your normal cleaning and sanitising procedures. At the end of the day, STA would then recommend full disinfection takes place, where the equipment is cleaned, sanitised, disinfected, rinsed and dried ready for the next day. <https://www.gov.uk/government/publications/covid-19-decontamination-in-non-healthcare-settings/covid-19-decontamination-in-non-healthcare-settings#left-area>
- No sharing of equipment between swimmers - discontinue the loan of goggles and encourage everyone to bring their own equipment
- Ask swimmers to bring their own equipment to the lesson. Swim schools could sell the equipment to the swimmers and ask that it be brought each week to each lesson
- Consider having 2 separate sets of equipment and using them in alternate lessons; then while one is being used, the other can be disinfected by an appointed member of staff
- Review the amount of games planned within a lesson, can the games be played whilst social distancing is maintained? Do the games require lots of equipment which will be shared between swimmers?

Hygiene

- Consider nominating a Hygiene Officer for each shift who's role is to facilitate the cleaning, sanitisation and / or disinfection of equipment at the end of each lesson and assist teachers in certain situations when dealing with a child with a runny nose etc
- Toilet facilities to be used on an urgent needs basis and cleaned thoroughly and regularly with limited usage dependent on size of facility
- Consider the ability of swimmers to manage their own hygiene and self-care such as blowing their nose, putting their goggles on, putting a swimming hat on, to reduce the need for physical contact
- Consider increasing the circulation of outdoor air as much as possible by opening windows and or doors. However, do not open windows and doors if doing so poses a safety risk to staff or swimmers
- Ensure swimming teachers have access to hand gel on poolside so they can regularly use it
- Provide wet wipes on poolside for swimmers to blow their nose or if they need to cough and a bin to dispose of the wipe.

Social distancing measures

- Maintaining social distancing in the pool will be the most challenging aspect. To maintain 2m distances, calculate the square metres for your pool. Include swimming teachers, parents / guardians and swimmers in your calculation for lessons and swimmers. Currently everything is subject to the 2m rule
- Consider reduced lesson sizes and lesson times (while still remaining viable) or provide more pool space per class to enable greater social distancing during the lesson? For example, a former 6-swimmer lesson that ran for 30 minutes may need to be adjusted to a 3-swimmer lesson for 20 minutes. Effective use of this lesson time can improve the experience for the swimmer despite the shorter lesson
- Consider staggering lesson start times to minimise the possibility of swimmers congregating in groups while transferring in and out of lessons
- Teach from poolside or in the water with a 2m distance from swimmers (always risk assess)
- Place swimmers from the same household in the same lesson and always keep twins together
- Bring parents / guardians into the water to work with their own children at the direction of the swimming teacher to assist non-swimmer / beginner swimmers over the age of 3 years old
- Adult and child lesson can be delivered as a group providing you have enough water space to maintain social distancing
- Reassign high risk swimming teachers (i.e. pre-existing medical condition) to teach out of the water or perform other duties
- No high fives, handshakes or contact – instead give swimmers a thumbs up and use verbal positive praise to encourage and motivate the swimmers.
- Baby and pre-school swimming teachers use demonstration dolls instead of a baby or pre-schooler in the lesson
- Assign a swimming teacher to a section of the pool for the entire shift, thus minimising movement of groups around the facility
- Use sinking discs or dive rings to mark the location where each swimmer or small group is to isolate in the pool.

Determining Maximum Capacity - Guidance Only

In locations where strict social / physical distancing of 2 metres is in place, the first step in deciding what programmes may be practical is to determine the maximum capacity to maintain distancing.

FOR GUIDANCE ONLY - Measure the surface area of the swimming pools where lessons will be conducted, then divide that number by 3.14. The result will provide a theoretical maximum capacity for swimmers in the pool at any given time. From there, the practicality and feasibility for various types of lesson formats can be estimated depending upon which areas of the pool are used to conduct the lesson for a class for a specific age and ability level.

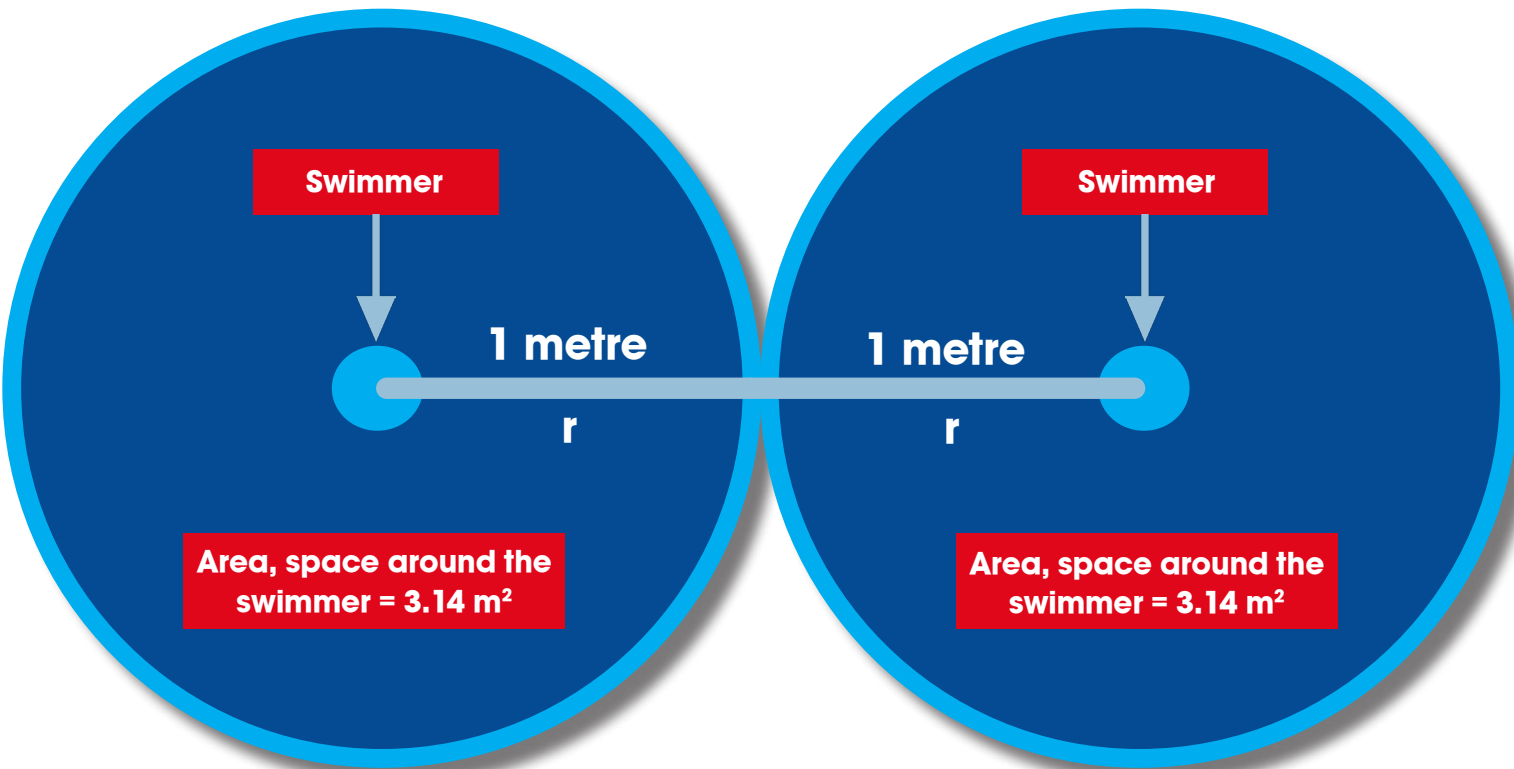
Mitigating circumstances will prevail here based on same family groups, age groups, activity groups, user type, travelling and movement etc. This is simply a guide while we wait for further guidance from Public Health England.

For example:

25 metre by 12.5 metre pool = 312.5 m²

312.5 divided by 3.14 = 99

The maximum spacing possible is 99 people in the 25 metre pool if they are all standing still and staying 2 metres apart.



NOTE: These figures are used to calculate maximum bather loads, but its essential that social distancing measures are controlled when undertaking activities in the pool – swimmers must maintain a 2m distance or 1m+ for mitigating circumstances (for acceptable mitigations please see page 26).

As per page 42, determining the maximum capacity bather load is the first step in deciding what types of swimming programmes are practical, and feasible to run where strict social / physical distancing of 2 metres is in place.

To help further guide STA members through this crucial planning process, STA has laid out the following 3 steps:

STEP 1: CALCULATE MAXIMUM CAPACITY BATHER LOADS

Measure the surface area of the swimming pool(s) where lessons will be conducted, then divide that number by 3.14 (or 3 if you follow Government guidance). To make this step even easier, STA has developed a new bather load calculator, which provides a theoretical maximum capacity for swimmers in the pool at any given time (the calculator can be used to determine numbers for the whole of the pool, as well as specific areas of the pool):

Bather Load Calculator – <https://www.sta.co.uk/news/2020/07/27/step-by-step-approach-for-determining-bather-loads/>

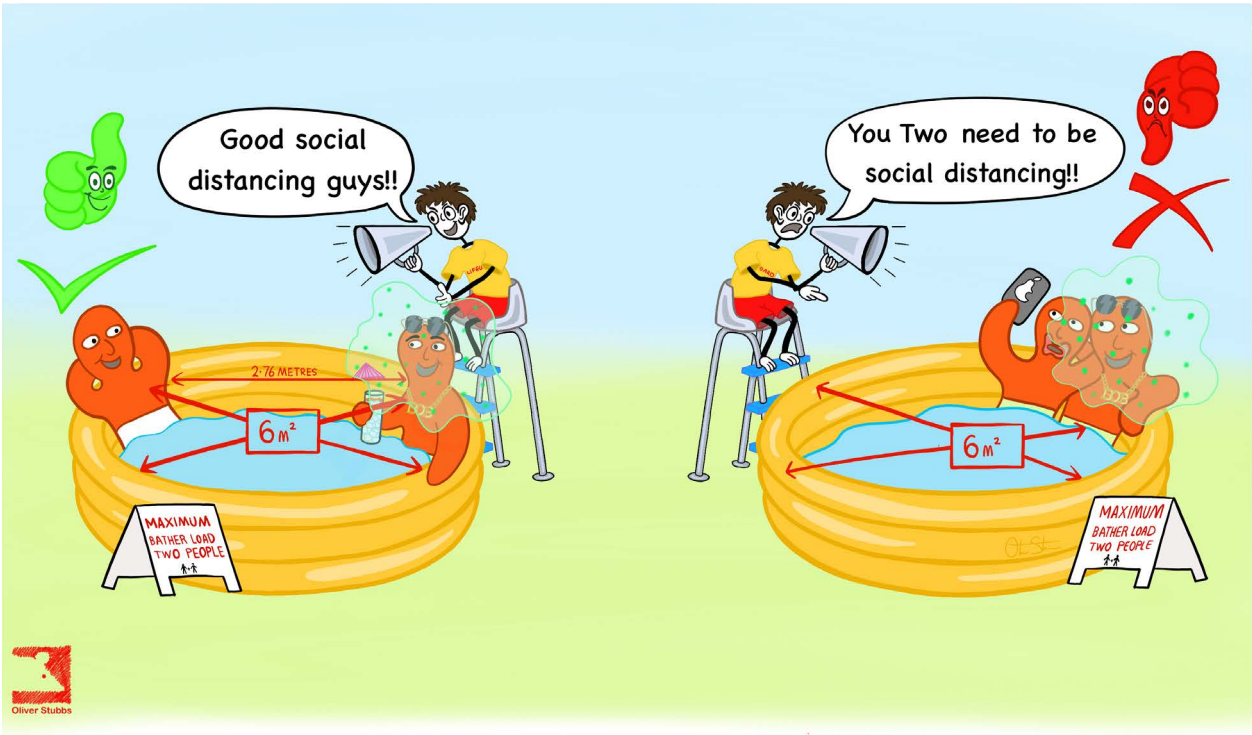
From here, the practicality and feasibility for various types of lesson formats can be estimated depending upon which areas of the pool (shallow / deep end) are used to conduct lessons for a specific age and ability level.

For Mitigating circumstances to the 2m rule – refer to page 26

STEP 2: SPACE PLANNING

The first step tells us what the maximum bathing load is, if all the swimmers are standing still and staying 2-metres apart, but now you'll need to work out social distancing for each activity that takes place, in each area of the pool. What is the difference?

To help illustrate this, STA asked Oliver Stubbs, a swimming teacher and cartoonist to create a cartoon using his characters Bob and Jellyman. The cartoon shows a 6sqm paddling pool, which gives a maximum possible bather load of 2 people (3sqm each). Whilst the maximum capacity is always 2 people, the position of those 2 people within that space then needs to be considered based on the activity type. The cartoon shows if one user has COVID-19 (green cloud) but is socially distanced from the other swimmer, they are less of a risk than if they are together.



Understanding bather loads & social distancing!



In reality this means you need to work out how each type of activity or class can take place whilst maintaining social distancing as they move around.



Lesson planning

- Not all classes / levels present the same risk. Swim schools should categorise their class levels into low, medium, and high exposure risk levels
- Consider reducing the amount of lessons which occur at the same time in order to maintain social distancing in the water
- Modify lesson plans to reduce / inhibit face to face teaching within 2m
- Spaced proximity classes include swimmers who can complete skills and drills without requiring assistance from the swimming teacher in the water and the class area is sufficient that appropriate social distancing from other swimmers is maintained
- Moderate proximity classes include swimmers who can be unassisted from a water confidence point of view, but the swimming teacher needs to manually manipulate the swimmer in the water to help them attain / improve their skill
- Close proximity classes such as non-swimmer or beginner lessons, requiring the swimming teacher to manually assist the swimmer move in and out of the prone position as well as manually assisting them through the water and / or baby and pre-school classes that require an adult to be in the water. Consider when and how close proximity classes should be conducted (i.e. baby and pre-school swimming)
- When performing breathing activities, where possible, encourage swimmers to turn to the side to breathe, away from others. Swimmers should not be blowing out towards other swimmers or standing and blowing bubbles in close proximity to other swimmers
- Consider re-opening by focussing on advanced swimming lessons (if applicable). Lessons for more advanced swimmers provide less intimate interaction, and less in-water physical contact between swimmers, since the swimmers already possess basic swimming skills and can learn from poolside based swimming teacher communication.

STEP 3: RISK ASSESS

A specific risk assessment should be developed and continually reviewed for each of the activities being planned. As per page 12, free learn to swim risk assessment templates are available here <https://online.sta.co.uk/login>

MULTIPLE ACTIVITIES:

This same principle applies if you need to space plan to accommodate multiple activities taking place in the pool at the same time, i.e. if a swim school only hires a section of a pool for lessons and the other section is used by the pool owner at the same time for a different user activity. Calculate your bather load (step 1) and space plan (step 2) for your dedicated area, and risk assess (step 3) taking into consideration hygiene practices and the flow and movement around the facility to ensure social distancing can be maintained.

Guidance - COVID-19: Implementing protective measures in education and childcare settings. Updated 1st June 2020.

This week (1st June 2020), primary schools in England welcomed back children in nursery, reception, year 1 and year 6, alongside priority groups, and it is reasonable, for the purpose of calculating social distancing measures in a swimming lesson, to draw similar comparisons to those being [applied in school and early years settings](#).

Specifically, the latest government information, based on the latest scientific advice, states:

"Where settings can keep children and young people in small groups 2 metres away from each other, they should do so. While in general, groups should be kept apart, brief transitory contact, such as passing in a corridor, is low risk."

Arguably, the government's principle of "duration and proximity" could be equally applied in a children's (pre-schoolers and primary age) swimming lesson – keeping young swimmers 2 metres apart whilst stationary in the pool and reduce this rule whilst a swimmer briefly moves / transitions past another swimmer i.e. minimum 1 metre (3 feet) as per WHO social distancing recommendations.

This supports the government's scientific theory that children have less severe symptoms and are less likely to become unwell if infected with the virus.

NOTE: Applying a 2-metre distance rule should be applied where possible, and swim schools and pool operators should always risk assess and implement a range of protective health and safety measures, as outlined throughout this guidance, including increased cleaning and reducing 'pinch' points (at entrance and exit points in and out of the pool).

Consider “assembly line” and rolling entry to maximise the number of swimmers

In traditional swimming lessons, all swimmers arrive at the same time, divide into teacher-led groups and proceed to an assigned area for instruction – usually around the perimeter of the pool.

While this method can still be used effectively with a greatly reduced number of people, an “assembly-line” method may allow for a greater number of swimmers to be accommodated with limited contact and interaction with other people. Creative class structure and organisation is necessary to make this format work.

For example, individual swimmers or small group / household units could be assigned a start time at 10-minute intervals. Upon entry into the facility, a clear staging area on deck is designated with social distancing measures in place. Swimming teachers could provide a briefing of the lesson plan and conduct land-based drills or instruction. On a pre-determined schedule, the group moves to a new “station” where an activity is conducted. A set-up that includes a land station, followed by two in-water stations, and ends with another land station could accommodate almost twice as many participants over a given time frame than a traditional set-up. When space is available, more than one assembly line can be operating on a slightly different time schedule in another area of the pool. Classes with more advanced swimmers who can swim the length of the pool may be offered concurrently.



Specific Swimming Lesson Delivery

STA has also set further specific guidance related to baby and pre-school, non-swimmers, beginner, improver and advanced lessons here.

Baby and Pre-School Lessons

Although the adults are supporting the baby, toddler or pre-schooler on a one to one basis, there must still be sufficient pool space in order for the pairs to socially distance from each other.

Considerations:

- One baby with one parent / guardian accounts for 'one' person when considering social distancing measures
- Provision of changing mats within the changing rooms and the regular cleaning requirement of these
- Reduce the lesson size to enable social distancing
- To reduce air droplets, consider the number of songs during a lesson and by who – consider only the baby and pre-school teacher singing rather than all the adults
- Structure the lesson so activities and songs can be completed / performed whilst social distancing is maintained
- Entry and exit into the pool, do the steps allow adults to carry their child safely out of the pool or does the swimming teacher need to hold the child, or can a mat be placed on the poolside to reduce the physical contact?
- Adults should stop babies, toddlers and pre-schoolers putting the toys and equipment in their mouths at any point
- Ensure equipment used has been disinfected after use.

Pre-School, Non-Swimmers and Beginner Lessons

There are a lot of variables to be considered for pre-school, non-swimmers and beginner lessons and it may be swim schools have to implement different changes at different facilities or different classes, depending on the age of the swimmer, pool depth and pool size. An adult non-swimmer in a one to one lesson will differ from a small group lesson of 4-year-old non-swimmers who cannot stand.

When reviewing the considerations swim schools will need to contemplate whether swimmers:

- Can stand in the pool?
- Do they require manual support from within the water?
- Do they understand and are they able to maintain social distance? If not, what provisions can be put in place to ensure they are paced 2 metres apart?
- Can they safely hold onto the poolside / handrail, in between swims?
- Need lots of teaching aids and equipment within the lesson, or can the amount of equipment used be reduced?

Considerations:

- For swimmers who are unable to stand, using buoyancy aids to provide more support if teaching from the poolside
- Reducing lesson sizes to ensure social distancing
- Asking the parent / guardian to be in the water with the swimmer, to offer support and ensure social distancing. However, be aware of an increase in changing room traffic
- Stop swimmers putting the toys and equipment in their mouths at any point
- Reducing the amount of toys / equipment used within the lesson.

Improver and Advanced Lessons

Improver and advanced swimmers may be older and understand how to stay apart from other swimmers, using markers on poolside to ensure swimmers are separate. However, swimmers will still need to be 2 metres apart and therefore, swim schools will need to ensure there is sufficient pool space for this, especially for lane swimming.

Considerations:

- Markers on the poolside such as floats / pull buoys or toys to indicate where each swimmer should be and swim back to
- When swimming in lanes, swimmers swim a length, climb out and walk to the starting point to maintain social distancing
- Limit the number of swimmers in a lane and extend the lane width to ensure social distancing on the return swim
- Asking swimmers to bring their own equipment to the lesson e.g. float and pull buoy. Swim schools could sell the equipment to the swimmer and ask that it be brought each week.

If old enough, could swimmers be dropped off at and collected from the swimming facility to reduce the number of people within the swimming facility.



Guidance Specific for Wales (Max 15)

In October, the Welsh Assembly Government announced its plans to have a 'firebreak' for 17 days and then re-open swimming pools in Wales from the 9th November. On reopening businesses after the firebreak, the Welsh Assembly Government also announced that there would be a new set of rules from 9th November 2020, where there is a maximum of 15 people allowed in one room/area for organised activities.

What does this mean for swimming lessons in Wales?

Children aged 3-10 years

For children aged under 11 (generally non-swimmer, beginner & improver classes), each child would **NOT** count towards the maximum of 15 persons in one room as per the Welsh Assembly Government / STA guidance.

Children aged 11 plus

For children aged 11 plus (generally advanced classes), each child would be included towards the maximum of 15 persons in one room as per the Welsh Assembly Government / STA guidance.

Baby & Pre-schoolers

For Baby & Pre-school classes (generally 0-3 years old), because the parent is in the water with the baby / infant then the 'pairs' would count as one person towards the maximum of 15 persons in one room as per the Welsh Assembly Government / STA guidance.

IMPORTANT FACTORS TO STILL CONSIDER:

- It is important to still factor in lifeguards, assistants, poolside helpers, COVID-officers and spectators towards the maximum of 15 persons in one room. Swimming teachers would not be included in the numbers towards a maximum of 15 people. (for example: A swim school operating 3 classes at one time with 3 swimming teachers, 1 lifeguard, 1 assistant and a COVID Officer would have 3 staff count towards the maximum of 15 persons in one room so would only be able to allow a maximum of 12 children aged 11 plus and spectators in the water/on poolside)
- It is recommended that all lessons, for all age groups, are risk assessed in line with the guidance set out by the Welsh Assembly Government and STA (**see page 12 for free risk assessment templates**)
- It is recommended that all swim schools / pool operators in Wales apply all reasonable mitigating control measures to still reduce the chances of COVID-19 within swimming lessons such as social distancing/hand washing/use of face coverings when not in the water etc
- Maximum numbers in an area should also be continued to be adhered to, in line with guidance from UK Active of 100sq/ft per person
- Maximum Bather Loads in the water should also be continued to be adhered to, in line with Welsh Assembly Government / STA guidance. Note: that while for under 11s, social distancing measures have been relaxed, there is still a maximum bather load capacity for swimming pools. Please refer to STA's Bather Load Calculator here <https://www.sta.co.uk/news/2020/07/27/step-by-step-approach-for-determining-bather-loads/>
- All other public areas of the leisure facility (**see page 24 onwards**) such as changing rooms, reception areas etc, the maximum of 15 persons in one room is still factored into your risk assessments and you are adhering to guidance from the Welsh Assembly Government / STA.

Keep up-to-date with the Welsh Assembly Government's guidance here <https://gov.wales/>

Thanks to STA Tutor, Chris Bateman for providing his expert advice.

Guidance Specific for Scotland

On 31st August 2020, swimming pools in Scotland were finally given the green light to reopen. The guidance set out by Scottish Swimming is very similar to what we have produced here – noticeable additions in relation to swimming lessons include:

- Children returning to the pool will need to recap the areas of water safety as a priority area of learning. This should include both swimming pool safety rules and water safety information.
- Re-assess swimmers' ability against relevant outcomes to establish their current level of performance and where you need to prioritise your lesson.
- Children aged 11 years and younger are not required to physically distance, as set out in Scottish Government guidance. Therefore, in line with Scottish Swimming's guidance, any programmed session in the pool for children of this age group should be supervised at all times and measures should be introduced to minimise contact between children, but where possible staff should continue to follow physical distancing guidelines.

For full details please refer to Scottish Swimming's full guidance here <https://www.scottishswimming.com/media/3311012/scottish-swimming-aquatic-participation-swimming-lessons-covid-19-back-to-the-water-guidance-final.pdf>

Protection for Swimming Teachers

Protection for swimming teachers will require significant attention and thought. COVID-19 is a respiratory illness. It is spread between people who are in close contact and through respiratory droplets when an infected person coughs, sneezes or talks. It is possible to get COVID-19 by touching a surface with the virus and then touching your face. There are several strategies for protecting swimming teachers. You will have to choose what will work best for your team and based on guidelines, risk levels and safe work requirements.

Considerations:

- Swim schools need to implement control measures to eliminate or minimise the spread of COVID-19 and ensure the health and safety of their workers and others. This is a requirement under The Health and Safety at Work Act 1974
- Swimming teachers should be assigned one zone in the pool to work / stay in for their entire shift. Lesson plans should be adjusted to deter face to face contact and assist with social distancing guidelines
- Breath control skills should be performed with swimmers blowing to the side
- Swimming teachers should maintain a side on teaching position, so they are not directly facing the swimmers
- Swimming teacher to swimmer ratios should be modified to reflect how many people can be allowed in the facility / building at one time
- Consider creating swimming teacher teams that work the same shifts so if there is a possible infection that team can self-quarantine without impacting other teams.



Swim Teachers - PPE and Face Coverings

Managing the risk of COVID-19 in the workplace involves social distancing, hygiene and fixed teams or partnering, NOT through the use of PPE.

When managing the risk of COVID-19, additional PPE beyond what you would USUALLY wear is NOT beneficial.

The government guidance states that "Workplaces should not encourage the precautionary use of extra PPE to protect against COVID-19 outside clinical settings or when responding to a suspected or confirmed case of COVID-19."

Where you are already using PPE in your work activity to protect against non-COVID-19 risks, you should continue to do so, i.e. as a first aider or pool plant operator.

The government guidance also states: "It is important to know that the evidence of the benefit of using a face covering to protect others is weak and the effect is likely to be small, therefore face coverings are NOT a replacement for the other ways of managing risk, including minimising time spent in contact, using fixed teams and partnering for close-up work, and increasing hand and surface washing. These other measures remain the best ways of managing risk in the workplace and government would therefore not expect to see employers relying on face coverings as risk management for the purpose of their health and safety assessments."

Wearing a face covering is optional and is not required by law, including in the workplace. If you choose to wear one, it is important to use face coverings properly and wash your hands before putting them on and taking them off.

For swimming teachers too, the wearing of a face covering may inhibit communication with swimmers who rely on lip reading, facial expressions and clear sound.

Lifesaving and First Aid Provision and Training

FURTHER, MORE DETAILED GUIDANCE WILL BE AVAILABLE SOON.

The type of lifesaving and first aid provision swim schools provide will depend on the swimming facility and risk assessment. However, consideration must be given to ensure social distancing is maintained where possible and that the safety of the lifesaver and first aider is put first.

It will not always be possible for lifesavers and / or first aiders to keep 2 metres apart. For example, lifesavers and / or first aiders may have to work closely with each other or customers because of the nature of the task, such as:

- Lifesaver performing a rescue
- A first aider giving CPR.

The preservation of human life will always take priority over social distancing. Therefore, if a swimmer is in difficulty, the lifesaver must respond quickly and where required.

Lifesavers and first aiders have a duty of care to preserve human life, therefore, if required lifesavers and first aiders will still perform CPR.

For further guidance on COVID-19 CPR protocols from the UK Resuscitation Council please visit, <https://www.resus.org.uk/media/statements/resuscitation-council-uk-statements-on-COVID-19-coronavirus-cpr-and-resuscitation/covid-community/>

Swim schools should ensure lifesavers and first aiders have easy access to CPR face shields / pocket masks, gloves and a fully stocked first aid kit to allow for safe delivery of CPR and first aid.

When on poolside, lifesavers must maintain social distancing from swimming teachers, parents / guardians and swimmers on the poolside, whilst being able to observe the swimming pool. Swim schools must ensure the lifesaver has space to patrol the poolside and when needed, able to respond quickly to an emergency. This may mean limiting the amount of people on poolside at one time.

Considerations:

- Ensure face shields, pocket masks and gloves are provided in case CPR needs to be given
- Ensure rescue equipment is cleaned regularly
- Limit the people on poolside to ensure the lifesaver is able to socially distance.

Maintaining Competency Training

Lifesavers and first aiders should ensure they maintain their occupational competency by attending regular training. The frequency of the training is set by the employer; however, it should include CPR training and for lifesavers pool rescue skill training.

Social distancing will still need to be maintained throughout training sessions.

For guidance on COVID-19 CPR training protocols from the UK Resuscitation Council please visit, <https://www.resus.org.uk/media/statements/resuscitation-council-uk-statements-on-COVID-19-coronavirus-cpr-and-resuscitation/covid-training/>



Conclusion

In conclusion, while we wait for the official guidance to be published by the UK government, we have summarised all the key points here for the recommended sequence of actions all swim schools, no matter size, should consider in preparation for re-opening swimming pools.

- Stay up to date with official government guidance
- Appoint a COVID-19 Officer
- Conduct a risk assessment and plan for reducing contact with and disinfecting the common physical areas used during swimming lesson programmes
- Consider a policy that encourages coming to the pool ready to swim and showering before and after at home
- Determine a plan for use and disinfection of teaching equipment and toys. Consider options for a “bring your own” or “clean your own” policy to reduce staff time needed to disinfect
- Implement procedures to monitor that cleaning and disinfection procedures are followed
- Determine the policy for use of face coverings and other protective devices for swim school staff, swimming teachers, lifesavers and lesson swimmers, including which type(s) will be allowed
- Review chemical testing and documentation procedures and the water quality maintenance plan
- Determine how any health screening of employees and / or swimmers will be conducted, and develop an enforcement plan and protocols for known or suspected COVID-19 cases
- Review the operational safety plan for the pool facility
- Consider swimming lesson capacities and measures for teaching to determine what is safe and practical in line with social distancing measures
- Evaluate any additional resources that may be needed to provide surveillance at new entrances or exits
- Evaluate the facility Emergency Action Plan (EAP) modifications and enhanced Personal Protective Equipment (PPE) for emergency response that may be needed to be put in place, and how these changes affect swimming teachers
- Prepare to train swimming teachers / lifesavers / swim school staff on COVID-19 awareness, employee safe workplace practices for handwashing, staying home if ill and reporting illness
- Create a training plan to update all staff on new policies, procedures and methods of class delivery
- Communicate and consult with customers.

In at the deep end and The Swim Surgery have analysed both the STA and RLSS guidance and created a colour-coded walkthrough list to help with managing COVID-19 related tasks – [free to download here](#)

AND RISK ASSESS EVERYTHING

Like most other services, swimming lessons when they resume will be different until the COVID-19 pandemic has slowed or been eliminated. How this looks will vary widely among aquatic facilities, and the STA will continue to update this live document in line with new guidance and developments for the benefit of members.



VERSION CONTROL

As this is a live working document, it will get updated when required in line with latest advice / information from the government as well as industry experts. **Keep an eye on this page for all tracked changes.**

Version	Changes Made	Date of Changes
20.16	<ul style="list-style-type: none"> Update on Welsh Guidance after Firebreak - page 52-53 	6th November 2020
20.15	<ul style="list-style-type: none"> Update on cleaning closed cell equipment - page 36 	9th October 2020
20.14	<ul style="list-style-type: none"> Update to COVID-19 track and trace apps - page 23 	28th September 2020
20.13	<ul style="list-style-type: none"> Further updates to NHS Track and Trace Service and rules that apply to leisure venues - page 23/24 	21st September 2020
20.12	<ul style="list-style-type: none"> Update to confirm that it is now mandatory for organisations to assist the NHS Test and Trace service - page 23 	14th September 2020
20.11	<ul style="list-style-type: none"> Addition of Guidance for Scotland - page 53 	31st August 2020
20.10	<ul style="list-style-type: none"> Update on planning for multiple activities - page 45 Link to new colour-coded planning tick box, thanks to in at the deep end and The Swim Surgery - page 57 	13th August 2020
20.9	<ul style="list-style-type: none"> Updated Health Questionnaire - page 14 Addition of recommendation for face covering for parents / guardians - page 22 Addition of guidance specific for Wales - page 51-52 	3rd August 2020
20.8	<ul style="list-style-type: none"> Update to government policy on travelling overseas and returning to the UK - page 20 Maximum capacity bather load - further planning resources added - page 43-45 	28th July 2020
20.7	<ul style="list-style-type: none"> Updated cleaning (sanitisation) references on pages 13, 34, 35 & 40 as per government guidelines 	17th July 2020
20.6	<ul style="list-style-type: none"> Update on free COVID-19 Officer Awareness Training - page 10 Addition of NHS Test and Trace Service - page 23 Social Distancing in the Workforce - page 26 Update on cleaning - contact equipment manufacturers - page 34 Clarity on social distancing in the pool - page 41 Removed PPE / face mask reference - page 42 PPE update - page 49 	13th July 2020
20.5	<ul style="list-style-type: none"> Cross-referenced document against official government guidance - no changes required Changed wording on front cover to reflect swimming pools reopening dates in England Added official government guidance link - page 6 New link to STA's free learn to swim risk assessment templates - page 12 	10th July 2020
20.4	<ul style="list-style-type: none"> Updated risk assessment template links - page 12 Addition of no 'walk ins' as a consideration - page 28 Schools comparison on social distancing - page 41 	4th June 2020
20.3	<ul style="list-style-type: none"> A new Health Questionnaire added on page 14 Insurance advice added on page 14 	29th May 2020
20.2	<ul style="list-style-type: none"> Page 39 under subheading 'Determine Maximum Capacity' - further clarification on bathing load ratios 	21st May 2020
20.1 (Original Publication)	<ul style="list-style-type: none"> N/A 	20th May 2020