



Wet Leisure Supervision Policy Statement

Wet Leisure Supervision Policy

I have reviewed the Wet Leisure Supervision Policy for Hilton Worldwide and in doing so have taken account of current thinking in respect of risks and the control of those risks in small leisure pools. I believe the content to be a balanced approach, is pragmatic and easy to understand for the team members running the pools.



Jackie Gawen
CMIOSH, CMCIEH

Introduction

The aim of this Policy is to ensure, so far as is reasonably practicable, the safety of our members, visitors and guests using our Health Club facilities.

The facilities found within our wet leisure area normally comprise a swimming pool, spa bath, bubble pool, sauna, steam room, showering facilities and relaxation area. Our facilities are typically simple pools provided for leisure use and relaxation and as such most do not have any additional hazards introduced by water features or types of bather. This is consistent with both current national guidance and the current European Standards which separates out large public sector facilities and privately run pools. This Policy reflects this lower level of risk and incorporates the appropriate control measures.

If a pool does include any additional hazard such as a slide or water jet, for example, this must be fully documented on the attached Risk Assessment and the control measures identified in that Risk Assessment fully implemented.

We recognise the main hazards with high risk potential are slips, trips & falls, infection (from poor water quality) and drowning.

This Policy must be read in conjunction with the General and Health Club specific risk assessments and the internal documentation provided for use in each Health Club or the Hotel in which it is based.

We intend that our Policy (as outlined below) shall be our minimum standard across all clubs with wet leisure facilities. The Hotel/General Manager should recognise the importance of supervision of the facility in reducing risk in our pools and ensure this policy is fully complied with at all times and trained to all Team Members.

We have had regard to current national guidance, which advises supervision as the main preventative measure against incidents and major injuries. Such

guidance advises industry to take a risk based approach to pool supervision. We have therefore assessed our user groups, reviewed our pool types, their features and had regard to current accident data for our Health Clubs across the UK. As a result we believe that the measures detailed within this document, address the points raised in our risk assessments and together with all specific Safety & Security information for our Health Clubs are deemed sufficient to protect the safety of our Guests, Team Members and all persons associated with our Health Clubs.

Appendix 1 must be used to document the specific supervision arrangements in place at the Health Club.

Appendix 2 must be used to document the full details of the Wet Leisure Supervision Risk Assessment and associated controls in place.

Appendix 3 must be completed by the Health Club Manager and Hotel/General Manager to confirm compliance with this Policy.

Levels of Supervision

Minimum Levels of Supervision (Occasional Supervision) – All Health Clubs

We provide a minimum level of supervision within every Health Club.

Our minimum levels of supervision include:

- Periodic monitoring of all areas of the Club.
- Regular patrolling (directed by the Club Manager) of gymnasium, poolside, spa, sauna, steam rooms and changing rooms.
- CCTV monitoring of bathers using the facility.
- Team Members on Duty at Reception must be trained to monitor the CCTV cameras on a regular basis in addition to the regular patrols.

Where Club reception desks are located at or near poolside, this further contributes to the level of supervision.

We consider that the Health Club Manager knows the level of public attendance (members and guests). Manning levels should be set in light of that knowledge and to accommodate the need for regular touring of facilities. Health Club Team members involved in pool supervision, must be pool attendant qualified as a minimum. Some Health Clubs will be required to employ a qualified Lifeguard due to the specific hazards associated with the pool and these will be documented at local level.

When deciding manning levels special consideration should be given to pools which regularly have children or adults perhaps not familiar with leisure facilities and who may be liable to over exert themselves.

Children under the age of 16 must be accompanied by a parent or guardian in the water when using leisure facilities as highlighted on the Club Rules displayed within the Health Club.

Constant Poolside Supervision

For Clubs where increased hazards exist, then additional site specific controls may be employed and will be reflected in the relevant risk assessments.

Constant poolside supervision should be in place when specific local hazards have been identified that increases the risk to users. This may include, but not be exclusive to:

- Pools with a large surface area where all areas of the pool are not clearly visible.
- Pools greater than 1.5m in depth
- Pools with obscured visibility – in particular blind spots.
- Pools that attract more children such as those with water features such as slides or those pools in more resort based Hotels/Health Clubs.

Appendix 1 should be used to document the levels of supervision at use in the Health Club.

Where constant supervision at poolside is provided the 10:20 rule should be adopted which requires a response to a bather in difficulty within 10 seconds and reaching the bather in difficulty within 20 seconds.

Additional Supervision Support

On the few occasions where a single Team Member may be on duty within the Health Club, Hotel Management must provide other Team Members to cover during rest breaks and when work duties are required away from view of the pool.

Where this additional supervision support is required, the requirements for trained first aiders and qualified pool attendants must remain. This may mean that Managers on Duty in the Hotel will need to undertake a pool attendant course to ensure we have this minimum level of cover within the facility. In circumstances where supervision cannot be provided, the pool area must be closed.

Any additional supervision support should also be documented within Appendix 1.

Children's Hours, Splashtimes & High Child Occupancy

During 'Children's Hours' and 'Splashtimes' a minimum of a qualified pool attendant must be present on poolside watching the water and to supervise the activities in addition to the usual supervision by parents or guardians. Additional manning levels will need to be considered during these periods so that other duties within the club can be maintained whilst the poolside is being supervised.

For pools that naturally attract a higher occupancy of children due to the Hotel's location (near the seaside or other resort type destinations) or where the features of the pool attract more children such as slides, then this will

need to be identified in the Site Specific Supervision Arrangements (Appendix 1). The Health Club Manager should consider what additional supervision may be needed if child occupancy is routinely high or is high at peak times of the day or week. Similar to Splashtimes and Children's Hours, additional manning should be in place on poolside at these times of high child occupancy of the pool and the site specific assessment should document this.

Swimming Lessons and other 3rd party Users

Before swimming lessons or other 3rd party user groups are permitted within Health Clubs, a contract approved by Hilton's Legal Department must be signed by the lesson provider/organiser and the Hotel. The Club Manager must request in advance copies of all relevant Health & Safety information related to the swimming lessons. This would include documents such as copies of insurance certificates, proof of teaching qualifications, first aid certificates and risk assessments for conducting lessons etc.

Health Club Team Members need to ensure that the number of children on poolside and bather load is monitored. Overall responsibility for supervising lessons will however rest with the swimming instructor or 3rd party group organiser.

In Health Clubs where swimming lessons take place or 3rd party users are utilised, a specific risk assessment will need to be completed (See Appendix 4).

Caution should be exercised if the pool is to be dual use (for example swimming lessons in half of the pool and regular bathers in the other) to ensure that both Health Club Management and 3rd Party Instructors/organisers understand where responsibilities are split.

Where there is exclusive use for swimming lessons the Swimming Club must fully adopt the relevant ASA Guidelines.

CCTV

CCTV is a key part of the supervision of our facilities but does not replace tours or general team member awareness. In some Health Clubs the use of CCTV will be the main method of supervising the pool. Team Members on duty at reception must monitor the CCTV screens frequently and be able to respond immediately, following the Emergency Action Plan, should an emergency situation arise.

CCTV systems must be under a service and maintenance contract and any faults highlighted on the system should be repaired promptly to maintain full coverage. The CCTV images must show a clear view of all areas of the pool without any blind spots, excessive glare or poor image clarity. Should a CCTV system fail or be ineffective in assisting monitoring then alternative supervision arrangements should be made and this documented within the site specific risk assessment.

CCTV camera images should also be checked during dusk and hours of darkness to ensure that there remains good poolside and underwater visibility. There are similar requirements for outdoor pools with weather as an added factor that could affect poolside and underwater visibility. Likewise, if any local lighting or weather conditions affect the ability to supervise the pool, then alternative supervision arrangements will need to be made and also documented within the site specific risk assessment.

In order to determine good visibility of the bottom of the pool a focal point must be established that is used as a point of reference to check visibility of the deepest part of the pool. For example a patterned tile or drain cover. If this is not clearly visible it indicates that pool clarity is insufficient and the Emergency Action Plan must be followed.

Pool Attendants & Lifeguard Provision

Within all Clubs at least one Pool Attendant/Pool Responder must be on duty at all times within the Club irrespective of the size or depth of the pool to supervise activities within the pool.

The Pool Attendant/Pool Responder qualification must be in-date and refreshed as required. It is critical that this qualification is valid to at least the maximum depth of the pool where the operative will be required to supervise and this must be specified on the certificate.

Where additional hazards are present, a trained pool attendant should be replaced with a qualified lifeguard. Such examples may include external pools, regular and high levels of child attendance, excessive pool depths or the presence of water features such as slides. Any such controls should be reflected on the Health Club risk assessments.

First Aiders on Duty

It is preferable that a trained first aider is on duty within the Health Club at all times. However, to reflect typical operational issues this Policy acknowledges that during certain shifts this will not always be possible.

In the event of the lack of a trained first aider as part of the Health Club Team, then a trained first aider must be available within the Hotel at all times. A robust system must be in place at each Health Club for summoning help from a hotel first aider in these circumstances and the hotel first aider must be aware that they are covering the Health Club during part of their shift.

Panic Alarms

Panic alarms, (located at poolside and clearly signed), provide a method of summoning assistance, their operation must be tested daily for wet leisure areas and recorded. Weekly tests are completed for other panic alarms not associated with the wet leisure areas. The signage for the panic alarms must be clearly visible to bathers.

Signage

The provision of company signage confirming safety advice relating to general behaviour and the use of the facilities and the existence of CCTV must be displayed. This signage should follow the current Hilton Worldwide Signage Manual for Health Clubs. Any additional specific hazards such as sudden changes in depth of a pool must also be signed. The Health Club Safety Advice Guide contains additional information on the correct use of signage.

Life Saving Aids

A reach-pole and throw bag or torpedo should be provided at poolside for use in the event of an emergency. These should always be immediately available on poolside and kept in a good, clean condition. The equipment available should be the same as that used in the Pool Attendant training courses so Team Members are familiar with the rescue equipment available.

Adult : Child Ratios

We consider that an adult guest will be able to supervise a maximum of 2 children under 16 at any one time.

Policy Revision

This policy will be reviewed annually or as deemed necessary by Safety & Security.



Matt Tailby
Director of Fitness

November 2014



Alex Humphrey
Director, Safety & Security Europe

November 2014

Site Specific Supervision Arrangements

The following outlines the specific supervision arrangements at _____ Health Club. These should be explained to all Health Club Team Members as part of the Supervision Policy Training. The Supervision Policy Risk Assessment in Appendix 2 should be used to record all associated hazards and controls identified.

Health Club Features:

- Maximum Pool Depth: _____ metres Surface Area: _____ m²
- Bather Load _____ (See Section 4 of Health Club Safety Advice Guide for Calculation)
- Focal Point for depth visibility and water clarity is _____

Specific Hazards that affect decision on Supervision levels: (Specify Below)

- Pool/s are external Pool view obscured High child occupancy
- Splashtimes/Children’s hours regularly undertaken 3rd Party Groups used
- Water features present (Specify) 1. _____ 2. _____
3. _____ 4. _____
- Lone bathers in the pool No Specific Hazards Present

Supervision Type (✓ which apply):

- Minimum Supervision by: ___ No. Pool Attendants ___ No. Lifeguards
- Constant Poolside Supervision at specific times by:
- ___ No. Pool Attendants ___ No. Lifeguards (Specify the specific times):

Specify Specific Times when Constant Poolside Supervision Occurs

1. _____ 2. _____ 3. _____

- Constant Poolside Supervision at all times by:
- ___ No. Pool Attendants or ___ No. Lifeguards

Name: _____ Position: _____

Signed: _____ Date: ____/____/20____

Supervision levels must reviewed as part of the Supervision Risk Assessment Review and any changes should be documented by updating this document.

 GENERAL RISK ASSESSMENT RECORD					
DEPARTMENT			Health Club		
WORK TASK OR PROPERTY ISSUE			Swimming Pool Public Safety & Supervision		
GENERIC HAZARDS - Applicable to all Health Clubs					
Diving / Jumping into shallow water.	✓	Unsafe Entry / Exit to Pool	✓	Unaccompanied Children (under 16) accessing Pool	✓
Uncontrolled entry into Pool Hall	✓	Guest Ill-Health Condition	✓	Health Conditions due to Poor Water Quality	✓
Poolside Surfaces (wet / damaged)	✓	Moving Parts / Entrapment / Entanglement Hazards within the Pool Structure & Outlet Covers	✓	Inadequate Poolside Lighting or Excessive Glare	✓
Inadequate Underwater Pool Lighting	✓	Missing/Incorrect Rescue & First Aid Equipment	✓	Abrasive wall finishes present on pedestrian walkways.	✓
Use of Inflatables	✓	Steps, Ladders, Handrails of Poor Design/Condition	✓	Poor placement of water depth signs	✓
Chemicals	✓	Electricity	✓	Slips/Trips/Falls on Poolside	✓
Glass/ Sharps	✓	Hot Surfaces / Liquids	✓	Inadequate Ventilation	✓
Bodily Fluid Spillages	✓	Public Violence/Disorder	✓	Fire / Explosion	✓
SUPERVISION RELATED HAZARDS - Applicable to all Health Clubs					
Staff Distracted from Supervision Duties	✓	Parents/Guardians not Supervising Children	✓	Unqualified Staff / Total Lack of Supervision	✓
Delayed Response to Panic Alarm or Panic Alarm Failure	✓	CCTV System faulty/inoperable/not suitable for Supervision	✓	Pool Attendant Supervision not suitable for user group/s including lone bathers	✓
Pool Attendant Supervision not Suitable for Pool Type	✓	Rota's not managed appropriately creating short manning	✓	Pool water clarity insufficient to see bottom of pool at deepest part	✓
POOL SPECIFIC FEATURES PRESENTING ADDITIONAL HAZARDS (To be made Club Specific and duplicate assessments will be needed one per pool)					
Max Pool Depth: _____metres which accounts for approx _____% of pool surface area		Sudden Changes in Depth Present? <input type="checkbox"/> No <input type="checkbox"/> Yes (Specify) _____ _____		Excessive pool tank gradient present (>1:15)? <input type="checkbox"/> No <input type="checkbox"/> Yes (Specify) _____ _____	
Pool is external? Specify additional hazards: _____ _____		Pool View Obscured? <input type="checkbox"/> No <input type="checkbox"/> Yes (Specify) _____ _____		Structural Features Present (e.g. Columns, bridges, tunnels etc) Specify: 1. _____ 2. _____ 3. _____	
Walkways around poolside are blocked or narrow		Access to Pool hall is near water <1.2m		Routes to water features (e.g. slides) lead to queuing near deep water	

Pool edge not clearly defined/contrasting		Water or Underwater Features Present (e.g. Slides, jets etc) Specify: 1. _____ 2. _____			
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USER GROUPS AT RISK

1.	Children (<16yrs)	✓	4.	Large Classes	
2.	Disabled Users	✓	5.	Hotel Guests	✓
3.	Elderly Users	✓	6.	Club Members	✓

CONTROLS APPLICABLE AT ALL TIMES ✓ in place X required

No Diving Signs displayed in shallow water areas		Water Depth Signs and Changes in Depth Marked/Signed Clearly		CCTV Cameras Maintained and checked for image clarity	
Bi- Monthly and Health Club Specific Checks Completed		Poolside Walkways kept Clear of Obstructions		Poolside Walkways Regularly Squeegied	
Poolside Hazard Spotting & Rectification		Report Urgent Poolside Defects		Pool/Spa Secured or Closed when no Safe Supervision is Possible.	
Dept Training including Safe Systems of Work in Place and Trained		Panic Alarms Operational & Tested		Health Club and Pool Water Quality Guide, Emergency Procedures File, Fire Book and Security Manual Utilised	
Controlled access to Poolside		Safety Signs as per Health Club Signage Manual		First Aid Policy Adhered to	
Glass Control at poolside		Health Club Rules Enforced by Management		Chemicals used and stored appropriately and COSHH info in place	
Daily Pool testing regime and monthly sampling undertaken as per Policy		Adequate Pool Hall and Pool Side Lighting		PEEPs and Health Commitment Statement in Place for all Pool Users	
Underwater step nosings are of contrasting colour		Pool closed if water clarity prevents clear view of pool bottom focal point (via CCTV or from poolside)		Sumps should be more than 2metres apart with anti-vortex covers fitted	
Entrapment/ Entanglement hazards controlled at design or sump alarm operational and maintained.		Grill openings don't exceed 8mm.			

ADDITIONAL CLUB SPECIFIC CONTROL MEASURES (Specify)

1.	Lifeguard replaces Pool Attendant due to additional hazards present		2.	Additional Supervision for Children's Sessions	
3.	Refer for capital funds to reduce depth of pool to <1.5m at next available opportunity.		4.	Rota's verified by Club Manager to allow for constant poolside supervision as per HSG 179.	
5.	Physical features of the pool hall are reviewed and amended. Specify: _____ _____		6.	Outdoor pools closed promptly during poor weather or where pool visibility is adversely affected	
7.	Additional Supervision for Lone Bathers in the Pool.		8.		

To ensure compliance with the current Hilton Worldwide Supervision Policy the Hotel's Area Safety & Security Manager must review the above risk assessment with the Health Club Manager to ensure that adequate controls are in place

Area Safety & Security Manager Sign Off:

Name: _____ **Signed:** _____ **Date:** ____ / ____ /20__

Risk Review Calculation

SEVERITY		X	LIKELIHOOD	
5.	Death	X	5.	Highly Likely
4.	Major Life Changing Injury – Permanent Total Disability	X	4.	Likely
3.	Moderate Injury – Short Term Impacts	X	3.	Possible
2.	Minor Injury – Minor Short Term Impacts	X	2.	Unlikely
1.	No Injury/Illness or Trivial Injury Requiring only First Aid	X	1.	Highly Unlikely

RISK FACTOR AFTER ✓ CONTROLS APPLIED

Severity	X	Likelihood	=	Result
Low 1-6		Medium 8-12		High 15-25
Existing Controls are Satisfactory		Outstanding Control Measures are Implemented within 3 Months		Immediate Prohibition of Task/Equipment with Actions Implemented before Activity can resume

OVERALL RISK FACTOR



Supervision Policy Confirmation Form

Please complete and return:

I, _____, Health Club Manager of
_____ Health Club

I, _____, General/Hotel Manager for
_____ Hotel

have read this Health Club Supervision Policy dated November 2014. I fully understand the contents of this Policy and I will ensure the Policy is trained to relevant Team Members, fully implemented and monitored through the completion of associated daily/monthly checks, bi-monthly checks and risk assessment reviews.

Issues which may arise to place the Club in a short term non-compliance of this Policy will result in the closure of the wet leisure area, reopening only when remedial actions have been completed.

Signed _____ Hotel / General Manager

Signed _____ Health Club Manager

Date ____/____/20____

Return this page to Safety and Security, Hilton Worldwide, Maple Court, Reeds Crescent, Watford, WD24 4QQ

						
GENERAL RISK ASSESSMENT RECORD						
DEPARTMENT			Health Club			
WORK TASK OR PROPERTY ISSUE			Swimming Lessons & 3rd Party Users			
GENERIC HAZARDS - Applicable to all Health Clubs						
Unqualified Instructors	✓	Public Violence/Disorder	✓	Inadequate Supervision	✓	
Unsafe Entry / Exit to Pool	✓	Diving / jumping / running on Poolside	✓	Unaccompanied Children (under 16) accessing Pool	✓	
Uncontrolled entry into Pool Hall	✓	Use of Inflatables	✓	Bather Loads Exceeded	✓	
USER GROUPS AT RISK						
1.	Children (<16yrs)	✓	4.	Large Classes	✓	
2.	Disabled Users	✓	5.	Hotel Guests	✓	
3.	Elderly Users	✓	6.	Club Members	✓	
CONTROLS APPLICABLE ✓ in place X required						
Poolside Hazard Spotting & Rectification		Report Urgent Poolside Defects		Controlled access to Poolside		
Health Club Rules Enforced by Management		PEEPs and Health Commitment Statement in Place for all Pool Users		Inflatables CE marked and under control of swimming instructor		
Legal Contract in place for provision of swimming lessons		Instructor/Club H&S Documentation Obtained & Reviewed		Specific Child/Teacher Ratio documented		
Health Club monitor pool user numbers		Bather Loads advised to users and controlled		Relevant sections of NOP and EAP shared with client		
ADDITIONAL CLUB SPECIFIC CONTROL MEASURES (Specify)						
1.			2.			
3.			4.			
Risk Review Calculation						
SEVERITY			X	LIKELIHOOD		
5.	Death	X	5.	Highly Likely		
4.	Major Life Changing Injury – Permanent Total Disability	X	4.	Likely		
3.	Moderate Injury – Short Term Impacts	X	3.	Possible		
2.	Minor Injury – Minor Short Term Impacts	X	2.	Unlikely		
1.	No Injury/Illness or Trivial Injury Requiring only First Aid	X	1.	Highly Unlikely		
RISK FACTOR AFTER ✓ CONTROLS APPLIED						
Severity		X	Likelihood		=	Result
Low 1-6			Medium 8-12			High 15-25
Existing Controls are Satisfactory			Outstanding Control Measures are Implemented within 3 Months			Immediate Prohibition of Task/Equipment with Actions Implemented before Activity can resume
OVERALL RISK FACTOR						

