



Risk Management Considerations for Municipal Pools

A 29-year-old woman was swimming at a City-owned pool when a child, who was under the supervision of the pool staff, jumped off a diving board and struck her. She sustained neck and shoulder injuries and re-injured a previous shoulder problem. She sued the City for damages.

Background Information

Municipal pools are a popular family recreation spot during Canada's summer months and they help to encourage fitness and exercise. They also, however, expose the municipality to a lot of liability. Your organization has a duty, as an occupier, to keep the property in a safe condition to accommodate its intended purpose. A proper risk management policy regarding municipal pools is essential to ensuring that everyone stays safe.

Risk Management Considerations

Pool Components

- Depending on the size of your complex there may be a variety of pool components on site, including:
 - Multiple pools.
 - Wave pools.
 - Kiddie pools.
 - Splash pads.
 - Lazy rivers.

- Hot tubs.
- Lap pools.
- Diving areas.
- Ensure that these areas are clearly marked and separated, and that guards are distributed among them as necessary to ensure the safety of all users.
- Wave pools, diving areas and areas for children such as kiddie pools and splash pads should have extra lifeguard attention, though not at the expense of other pool areas.
- There should be fencing around each of the pools in the complex to prevent children from reaching the pool without supervision.
- Fences should have child-proof gates to prevent entry into the swimming area.
- Check your local by-laws for specific fencing requirements.

Play Equipment

- If your pool includes play equipment such as slides and flumes, ensure there is pool staff at both the top and the bottom to prevent inappropriate use.
- Post and enforce maximum and minimum height and weight limits on play equipment, as well as safety rules.

Swimming Equipment

- Have life jackets available in a variety of sizes for children and non-swimmers.
- Keep flutter boards and pool noodles on hand as swimming aids.
- If you supply underwater swimming equipment, such as masks, to swimmers, they should be made with safety glass. Scuba tanks should be equipped with rubber covers to prevent tile chipping.

Surrounding Areas

- Decks should be slosed every evening with pool water. This is because it has a built-in disinfectant.
- Deck drains should be cleaned weekly.
- Ensure that non-slip grips are placed on the decks around the pool and that they are in good condition.
- Clear the deck of any obstructions, such as cords, equipment and chairs throughout the day and during each daily inspection.
- Watch for the development of cracks and holes in the deck surface.
- Ensure pool deck drainage is working to prevent the unsafe accumulation of water.
- Provide adequate lighting in change rooms.
- Clean change rooms often throughout the day.
- Provide lockers in change rooms to help prevent theft of patron property.
- All diving boards, platforms, ladders, ramps, and stairs should have non-slip surfaces or strips on them to prevent falling.

Food and Drinks

- Do not allow food and drinks to be consumed inside the pool area.

- Serve drinks in plastic cups and food on paper or plastic plates.
- Do not allow alcohol near any part of the complex.

Lifeguards

- Lifeguards, by law, must have a valid and up-to-date National Lifeguard Certification, as a requirement of employment. Make sure you see proof of their current certification prior to hiring.
- Bronze Cross certification is required as a prerequisite for National Lifeguard certification, and it includes first aid and CPR training
- Provide a day or two-day refresher course to all lifeguards at the beginning of the season.
- Ensure there are an adequate number of lifeguards on duty to cover the number of swimmers. Table 1.1 below provides an example from *Ontario's Health Protection and Promotion Act*.
- Lifeguards should be fifteen years or older, hold a current lifeguard certificate that is dated no more than two years prior to when they are acting as a lifeguard and have a copy of their certificate at the pool where they are working.
- Increase the number of lifeguards on duty during expected peak periods: weekends, school breaks, summer camps, heat waves, and during mid-day.
- Where there is only one lifeguard on duty on the deck, every operator should ensure that there is one or more additional persons on call who are fifteen years of age or over and trained in the emergency procedures for the pool.
- Allow lifeguards frequent breaks. Consider a rotating schedule in which lifeguards are given a break at least once every 2 hours. This is especially important for outdoor pool lifeguards.

TABLE 1.1: MINIMUM NUMBER OF LIFEGUARDS AND ASSISTANT LIFEGUARDS FOR A PUBLIC POOL WITH A WATER SURFACE OF LESS THAN 500 SQUARE METRES (OTHER THAN A WAVE/ACTION POOL)

Where there are assistant lifeguards and lifeguards on duty		Where there are only lifeguards on duty	
Number of bathers on the deck and in the pool	Minimum number of lifeguards and assistant lifeguards on duty	Number of bathers on the deck and in the pool	Minimum number of lifeguards on duty
0-30	1	0-30	1
31-100	2	31-125	2
101-200	3	126-250	3
201-300	4	251-400	4
300 or more	One additional lifeguard or assistant lifeguard for each additional 100 bathers or fraction thereof	400 or more	One additional lifeguard for each additional 150 bathers or fraction thereof

R.R.O. 1990, Reg. 565, s. 17 (2); O. Reg. 270/99, s. 1 (1).

- Lifeguards at your pool should wear a uniform that easily stands out and identifies them as lifeguards.
- Lifeguards should be told that it is part of their job to stop dangerous behaviour that violates pool rules.
- Lifeguards should be given the authority to ban people from the pool if they repeatedly ignore rules.
- Make sure that each lifeguard chair or station has all the necessary lifesaving equipment, which includes, but is not limited to:
 - First aid kit.
 - Lifesaving ring.
 - Reach pole.
 - Back board.
 - Neck brace.
 - Phone access.
- Do not clean pool filters on a timetable basis but rather clean them when they are dirty, which depends upon the number of swimmers in the pool.
- Janitorial duties such as cleaning deck drains and scum lines can be performed during pool down time.
- Open and clean skimmer baskets and lint traps each day on pressure systems.
- The scum line or ring may be cleaned with soda ash on a weekly basis.
- Do not use abrasive cleaners or steel wool on the scum line or ring.
- The walls of the pool should be brushed every evening to remove carbonate build-up.
- Clean up any spills on the pool deck and don't allow dirt to build up.

Other Staff Training

- All pool staff should be trained in first aid and emergency procedures.
- Only staff immediately involved in pool activities must be certified in CPR and have their National Lifeguard certification.

Health and Safety

- The first aid station should be inventoried daily for supplies and equipment.
- Consider purchasing an Automatic External Defibrillator (AED) and train all staff on how to use it.
- Question swimmers about any open cuts or sores and advise them not to use the pool.
- Advise that patrons with infectious and communicable diseases should not use the swimming pool.
- Advise that spitting, blowing the nose, or discharging bodily waste is prohibited in the pool.
- Outside telephone lines should be available for emergency use.

Cleaning

- Brush and/or vacuum the pool and hydro massage the bottom daily.
- Chrome and stainless steel fittings should be dry and rubbed each day.
- Covers or thermal blankets should be hung to dry to avoid re-contamination when installed, due to moisture that was trapped when they were rolled up.

Inspections and Maintenance

- Inspect all areas with a safety committee each month.
- Inspect the entire pool each month with underwater equipment.
- Use daily/weekly/monthly log sheets and inspection checklists. It's important to follow-up on problems as soon as possible.
- Check all nuts, bolts, washers, ladder treads, grab rails and wedge anchors for looseness daily.
- Ladders should have tread bolts tightened regularly as they tend to loosen easily.
- Ensure that steps and stairs have handrails, contrasting colours in tread edges and slip resistant tread surfaces.
- Check to make sure the lighting around the pool and in change rooms is working properly.
- Perform daily readings of chemical levels in the pool water and adjust nightly.
- Keep an inventory of chemicals on hand to avoid shortages.
- Oil all door hinges, closers, and latches monthly.

Pool Closures

- Immediately clear and close the pool during any emergency situation.
- Close the pool in cases of inclement weather, especially lightning.
- Close the pool if bodily waste is found.
- Close the pool if chemical tests are abnormal.

Signage

- Signs should be posted around the pool in highly visible locations.
- Signs should be written in simple language so that children can read and understand them.
- Use language such as “Don’t” and “No” rather than “Caution” and “Warning” so that children clearly understand.
- Signs must be maintained and should give information such as:
 - Children should be supervised.
 - Pool rules, including:
 - No diving.
 - No running.
 - No rough play.
 - No glass containers.
 - No food or drink allowed in the pool area.
 - No alcohol in the pool area.
 - No smoking in the pool area.

- Keep gate to the pool closed.
- Age limits for pool components (i.e. only children under age 7 in the kiddie pool).
- All children and non-swimmers should be accompanied by an adult.
- What to do in case of an emergency (get lifeguard, call 911).
- Warnings of any danger.

With proper maintenance and care pools can be a source of good, safe family fun. Limit liability by making swimmers aware of the rules and everyone will have a safe summer.