

Managing Health and Safety in the Design and Operation of Commercial Swimming Pools

Background

This factsheet is produced to give guidance to Members about potential changes in the way that commercial pools such as hotels and apartments, may need to be operated in future and therefore members should be aware when building or refurbishing these types of pools. Historically, one of the major documents covering this area has been *Managing Health and Safety in Swimming Pools* (third edition) (also referred to as HSG 179) and more details are provided below. However, with the introduction of BS EN 15288 *Swimming pools – safety requirements for design and operation*, there now exists a European-wide document that should be read in conjunction with HSG 179, as this is still relevant. Further details of this European standard are also included below. Mention is also made of an existing European Standard (BS EN 13451) which has 11 parts relating to swimming pool equipment. Members are recommended to purchase this standard from the BSi (contact details at the end of this factsheet).

It is SPATA's understanding, that in the UK, the Institute of Sport and Recreation Management (ISRM)'s advice is as follows:-.

Managing Health and Safety in Swimming Pools (third edition)

HSG 179 is still relevant for much of the requirements of BS EN 15288-2 and to follow the UK framework, there is little deviation to the application of a Risk Assessment, although HSG179 is more specific and hence the National Forward to BS EN 15288-2 says:

“The UK committee recognizes the positive benefits of establishing quality and safety levels in swimming pools across the European Community, and voted in favour of the adoption of this European Standard to support this objective. However, during its preparation the UK committee expressed concern that this standard does not maintain the minimum standard considered to be acceptable in the UK, which can be found in:

- *The Handbook of Building Design (Sports Council);*
- *The Pool Water Guide (Pool Water Treatment Advisory Group);*
- *HSG 179, Managing health and Safety in Swimming Pools (Health and Safety Executive);*
- *PAS 39, Management of public swimming pools — Water treatment systems, water treatment plant and heating and ventilation systems — Code of practice;*
- *PAS 65, Management of public swimming pools — General management — Code of practice.*



The UK committee therefore recommends that users of this document consider the resources listed above closely when applying this Standard with the intention of maintaining current levels of swimming pool safety in the UK”.

Managing Health and Safety in Swimming Pools (third edition)

This publication is produced by Sport England and the Health and Safety Commission (HSC) and has been an important document, as it has offered guidance to pool operators about reducing the risk of bathers drowning. Due to the fact that pools are safer places to swim, the Health and Safety Commission has traditionally taken a cautious approach to specifically regulating pool safety for fear of affecting the provision of public pools. The HSC has advocated reliance on the Health and Safety at Work Act 1974 and the supporting legislation and guidance to enforce safety. Part of this guidance is that risk assessments should be carried out to identify risks and find ways of reducing or eliminating the risks.

Swimming pools – safety requirements for design and operation (BS EN 15288)

BS EN 15288 is a European standard for swimming pool design which is split into two parts:

BS EN 15288-1 Swimming pools – safety requirements for design

BS EN 15288-2 Swimming pools – safety requirements for operation

These standards outline the following three pool types that will be covered by the legislation:

Type 1 – Pool where the water-related activities are the main business (e.g. communal pools, leisure pools, water parks, aqua parks) and whose use is public.

Type 2 – Pool which is an additional service to the main business (e.g. hotel pools, camping pools, club pools, therapeutic pools) and whose use is public.

Type 3 – All pools except Pools Types 1 and 2 and pools of private use.

Members should be aware that the typical occupancy of 3m² of water per bather should be taken into consideration in the design phase, along with minimum widths for the pool surround and these figures can all be obtained by purchasing a copy of the Standards from BSI (contact details at the end of this factsheet).

Comparing the different documents

The legislation will be applicable to new commercial pools and to the refurbishment of existing commercial pools and so SPATA members need to be aware of the changes in the guidance, therefore all the above documents will need to be consulted to ensure that the highest standard is adopted.



Members will need to note that BS EN 15288-1:2008 and BS EN 15288-2:2008 states "This standard includes requirements, recommendations and notes. Whilst compliant with requirements is mandatory, recommendations indicate best practices and notes give additional information and explanations.

Implications for this guidance

With the existing Health and Safety at Work Act (1974), SPATA is aware of at least one group of Environmental Health Officers (EHO's) from a Local Authority in England that are assessing commercial pools (such as hotels and guest houses) in their area and will be judging these pools against the new standards and guidance available. If the Local Authority does not feel the hotel operators have adequately assessed the risks, then enforcement action will be considered under the above Health and Safety at Work Act, for not controlling the risks to pool users. This particular Council is also prepared to seek a legal ruling on whether the use of the Health and Safety at Work Act in this instance, is correct, if anyone that was served an Improvement notice wishes to appeal. SPATA is already in dialogue with this Local Authority and will be engaging with other relevant bodies such as the Institute of Sport and Recreation Management (ISRM) to find a suitable way forward, but in the short term, in case other Local Authorities decide to follow the example of the first Local Authority, members need to be aware of the following issues in relation to designing, building or refurbishing public pools in commercial establishments such as hotels.

Where pool owners cannot meet the changes required from BS EN 15288, and taking into account HSG 179 such as water depths then a full risk assessment will need to be carried out in order to establish the way forward.

SPATA members may need to advise current clients that they should seek advice from their Local Authority EHO's about whether their commercial pool(s) should be modified to comply with the previous guidelines on the pool floor gradient and the pool depth, if they do not want to have to provide supervision, or they may run the risk of having an improvement notice served on them, which if not complied with, could lead to a closure of the pool.

SPATA Standards

Please note that the SPATA Standards generally require a higher standard than BS EN 15288 and are also more definitive. The SPATA Standards 2010 have not yet been revised to differentiate these different types of commercial pools and has retained the differentiation between commercial and domestic pools only, but this situation will be reviewed.

Please also note that, as advised in the SPATA Standards 2010, a dye test to verify the effectiveness of the circulation/distribution system of the water throughout the pool shell is considered necessary as part of BS EN 15288 and it is recommended that such a dye test be repeated every five years.



Swimming pool equipment (BS EN 13451)

A further health and safety issue for members to be aware of is that the commercial pool liners they need to install must comply with BS EN 13451, in relation to swimming pool equipment slip resistance conformity. Depending on the depth of water and the incline of the pool will determine whether a product should conform to Class A, B or C. SPATA installer members should ensure they ask their liner suppliers whether their products conform to Class A, B or C. The classes are reproduced below:

Class A

Horizontal swimming pool floor parts, where water depth is between 80 and 135 cm.

Class B

Horizontal swimming pool floor parts, where water depth is < 80 cm or inclined swimming pool floor parts, where water depth is < 135cm and where the inclination is <8.

Class C

Horizontal swimming pool floor parts, where water depth is < 135 cm and where inclination is >8 or steps, diving blocks.

Further information on all of these documents

For further reading members are requested to purchase copies of the relevant publications which are available from:

The Health and Safety Executive produce “Managing Health and Safety in Swimming Pools” HSG 179 (third edition), currently priced at £10.95. The ISBN is 9780717626861.

The British Standards Institution (BSi) produces the following documents that may be appropriate and please note that there are other documents that may be relevant and SPATA will be collating a list of relevant documents and will circulate them to members once they are ready.

BS EN 15288 Swimming pools – safety requirements for design and operation (in 2 parts)

BS 13451 Swimming pool equipment (this is in 11 parts)

The costs for each relevant publication can be confirmed with BSI at: BSI Group Headquarters, 389 Chiswick High Road, London W4 4AL. Tel: 020 8996 7002

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