

Open Water Safety Policy



Parks & Nature Conservation

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Water Safety Policy Open Water Sites

Foreword

Steve Hollingworth, Assistant Director. Sport, Events Open Space and Wellbeing

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FOREWORD

STEVE HOLLINGWORTH
SERVICE DIRECTOR
SPORT, EVENTS, OPEN SPACE AND WELLBEING

Within parks and public open spaces of Birmingham there are a range of open water features which enhance the environment for the enjoyment of people of all ages. These range from large lakes, pools, rivers, SUDs through to tributaries which flow from small streams into fast flowing rivers like the River Cole.

These natural features however present a significant risk to persons in summer when it is hot and swimming in cold water is attractive; and in winter when children and young people are attracted to and may put themselves at risk by walking on ice over deep water.

Parks & Nature Conservation in its risk assessment process will do all that is reasonably practicable to protect people from danger, this policy has been established and refined over many years with this objective in mind. We will continue to bid for resources into the maintenance and management of open water. However, budgets are limited and as major schemes are implemented through the City Councils Capital Programme or other capital funding that is subject to a bidding process.

If you have any suggestions to improve water safety at one of our sites please let us know. Please write to me at the address below or telephone our Safety Section on 303 2420.

Steve Hollingworth

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Date: **February 2018**

Water Safety Policy

Statement of Intent

The Strategic Director will, through the Assistant Director Sports Events Open Space and Wellbeing provide appropriate management arrangements and take measures to ensure that, so far as is reasonably practicable, all open water facilities and other areas of open water such as culverts, rivers and streams, are maintained in a safe condition for the benefit of users.

Birmingham City Council "Parks & Nature Conservation" does not support or approve the use of any area of open water for swimming or other in/on -water recreational activity unless it is organised through a bona fide organisation that have satisfied health and safety criteria set by Parks and Nature Conservation Safety Advisor.

Safety Criteria for Management and Design

There is continuous work being carried out to open water, for example de-silting, water edge treatment etc. Before such work is undertaken a number of design factors will be taken into consideration **to further improve safety**.

Edge gradients

The critical feature of all water edges is the gradient above and more importantly, the gradient below the water line. How the edge is then treated will be influenced by environmental factors. Where the water edge is open and accessible and is to remain so, the edge profile should be graded appropriately.

It is recommended that shallow water (less than 0.66m) should be extended a minimum of 2m from the water edge, via 1:3 gradients, and a further protective margin of 1.75m with depths from 0.65 to 1.36m via a 1:2.5 gradient.

Planting

Alternatively, where access to the water's edge is not required, but either a steep gradient (falling risk) or very shallow gradient (swimming temptation) exists, planting

of vegetation and natural vegetation will provide adequate and aesthetic protection.

Steep gradients

Where a steep gradient slopes down into open water, dense vegetation should be allowed to grow naturally or planted to prevent visitors reaching the water.

Shallow gradients

Where the edge is not steep, the risk of falling into the water is reduced. However, to deter swimmers, planting of water plants (reeds, willow etc) may assist in discouraging persons entering the water at these points.

Beach treatment

A further measure which may be deemed necessary if the above treatments fail to effectively deter bathers, is to lay any tempting 'beach' areas (i.e. shallow gradients) with 3 inches of ballast which, by its sharp edges makes access barefoot very painful. When any alterations are undertaken to open water facilities the overall recommendations within this policy must be taken into consideration as the work could have an effect on the information, education and supervision of the facility.

Design Facilities Adjacent to Open Water

When facilities such as play areas, external recreational or sporting facilities, walkways or planting areas etc which are adjacent or near to water, are to be developed, careful consideration of both design and maintenance will be made in accordance with the Construction, Design and Management Regulations.

The siting and design of such facilities will be jointly planned and prepared by the Assistant Director Sports, Events, Open Space and Wellbeing or nominated officer for (Parks & Nature Conservation), the District Parks Manager or other nominated officer, (Parks and Nature Conservation Safety Advisor) and the Head of Landscape Development, to ensure the safety of all users of the facilities and staff employed to maintain the completed facility.

Environmental Management

Where wildlife may be put at risk as a result of pollution (oil/blue green algae/etc) or pollution found to be present in or entering open water, City Council Staff and/or the City Council's Service Provider Staff must report such occurrences immediately to their line manager who in turn, will notify the District Park Manager or Representative and Safety Section for the appropriate action to be taken.



It is often the case that the Environment Agency will report the presence of blue green algae to us. In such cases, we will ensure that appropriate warning notices are displayed around the affected area and that water based recreation is prohibited or restricted until the water condition improves.

FISH DEATHS AND ENVIRONMENTAL INCIDENTS

Where incidences of large scale fish deaths or other wildlife are identified or reported (Please see local NOP/EAP for further details.)

Penstock Valves

All penstock and control valves are opened every 6 months to ensure the valve control gear is operational. The penstock and control valve checks are carried out by the Grounds Maintenance Service Provider and recorded in POPI. Appendix 1 details this process.

To avoid fish fatalities these checks must be carried out last week April and first week October. Outside of these dates a keep net must be set below the penstock valve on pools containing fish to reduce the risk of fish fatality.

(See Appendix 1 in the NOP/EAP for each site with open water for Penstock Operation Procedures)

Risk Assessment

Managers responsible for open water sites are responsible for carrying out Risk Assessment. The results of these risk assessments including any action taken to reduce or eliminate hazards will be formally recorded in compliance with the Risk Assessment Policy.

Where a risk assessment has previously identified areas known to be attractive for swimming, additional "signs, normally positioned at main entrances to the site in addition to those displayed within life buoy stands, will be positioned at regular intervals around the water's edge as determined by the risk assessment.

As an addition a site specific Open Water Risk Assessments will be undertaken as part of the site risk assessment process this will identify any specific additional water hazards inclusive of changing water levels. A checklist has been developed to assist risk assessors with this assessment. The assessment will be undertaken in June/early July each year before the school summer holidays.

Safety Inspections/Hazard Identification

We will ensure that routine safety inspections are undertaken by the City's Service Provider or by officers of Parks & Nature Conservation. Additional inspections will be undertaken by the Local Services Safety.

Inspection of rescue equipment is carried out on a daily basis.

The results of all inspections will be recorded and records will be maintained by the District Parks Manager. At the request of the Parks & Nature Conservation Safety Co-ordinator ad hoc audits on the provision of rescue equipment will be undertaken by Parks and Nature Conservation Safety Advisor. Safety inspections will monitor:

- a) The provision of rescue equipment
- b) Safety signs and other information notices
- c) Condition of the water and surrounding edges/banks

Where a shortfall in the provision of equipment or information is identified, this will be recorded in the inspection report. Where the inspecting officer considers that the shortfall represents a significant hazard, the District Park Manager will be notified as soon as possible.

Supervision of Open Water Sites

Full time supervision is deemed to be neither reasonably practicable nor the most effective response to a water hazard. Where angling is the only likely activity,



supervision is not necessary. During summer months, staff working at larger sites with areas of open water will have special regard to any open water activities taking place.

In certain circumstances and when staffing levels and duties permit, the Ranger Service or other members of staff may take a proactive role in preventing access to areas of open water for unauthorised activities such as swimming. In recognising the importance of this as a means of educating members of the public,

Where programmed activities such as water sports, take place on areas of open water, the organisation responsible for the activity is required to make adequate arrangements for ensuring the safety of all participants and spectators.

Rivers and Brook Courses

In circumstances where rivers or brookcourses run through parks and public open spaces under normal conditions the depth of water is negligible, and only in flood conditions the risk to users of the site increases. It is not practical to sign or provide lifebuoys for all sites where rivers and brook courses flow, in the event of such storm or flood conditions the use of the local media shall be used to highlight the potential increased risk to possible users of these sites.

Rescue Equipment

Parks & Nature Conservation will make available around all areas of open water, 24" life buoys in solid and highly visible mountings. The locations of the rescue devices will be determined by a risk assessment and will reflect likely points of access to the water and places where a rescue attempt may reasonably take place. However, after taking into consideration locations based on risk assessment, the guide shall be 1 lifebuoy every 200 metres, thus allowing reasonable time to locate and use such rescue equipment. Life buoys are often seen by members of the public as a key element in lifesaving. However, they are difficult to use over a distance, rather they invariably serve as a visual reminder of the hazards associated with open water. It is recognised that in spite of their role in rescue attempts and as a warning reminder, life buoys are also subject to vandalism and misuse.

Parks & Nature Conservation will ensure that the life buoys and housings are inspected on a daily basis by the City Council's service provider or other nominated

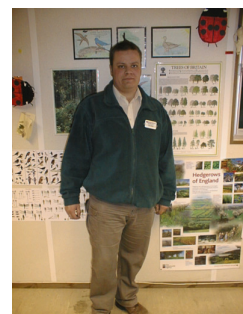
person the results of these inspections are recorded. **Where vegetation around the lifebuoy stands is identified as an issue on inspections, this will be removed to ensure lifebuoy stands are visible from both sides.** Where a shortfall in the rescue provision is identified, Parks and Nature Conservation will ensure that replacement equipment is made available as soon as possible after the shortfall is discovered. Where appropriate and as a result of the risk assessment, additional rescue equipment may be made available either on site or in a vehicle. We will ensure that all staff who may have access to such equipment will receive appropriate training as to its use.

Where persistent vandalism occurs the use of alternative anti vandal lifebuoy stands will be considered. Where persistent problems of vandalism to lifebuoys or where lifebuoys are stolen reasonable action will be taken daily to replace such equipment, allowing for one spare buoy per housing.

Provision of Information

Parks & Nature Conservation recognises that the provision of appropriate and adequate information on water safety, both to staff and to members of the public, is crucial to the success of the Water Safety Policy and to accident prevention. Information is made available in a number of ways.

Public Education the Ranger Service provides information on all aspects of water safety through an outreach programme to local schools and community groups, by direct contact with visitors and through regular contact with the various user groups undertaking various activities at Parks & Nature Conservation open water facilities.



Providing Literature At larger facilities where a range of activities may take place, literature highlighting key water safety issues and hazards is made available to visitors to the facility.



Site Information. Information is provided at principal points of access to facilities with areas of open water that gives details of the layout of the facility, provides a map (at larger facilities), displays principal warning signs in accordance with the recommendations of the RoSPA National Water Safety Committee and the requirements of the Health and Safety (Safety Signs and Signals) Regulations inclusive of emergency telephone facilities or telephone numbers.

Warning Signs

Warning signs are in place at all main entrances, plus in specific locations further entrance warnings signs may be installed where a particular issue has been identified. All signs are in accordance with the recommendations of the RoSPA National Water Safety Committee are displayed in areas where there is a particular hazard. In addition, on particular sites supplementary signage may be installed where beach gradient levels may change with changing water levels. Additional further nagging signs/stickers are displayed in the centre of life buoy stands repeating entrance sign warning information.



Reporting Accidents and Incidents

Where a member of staff is involved in an incident or sustains injury as a result of an accident, the reporting of the accident/incident must be in accordance with Parks & Nature Conservation written procedures, a summary of which is included in Appendix 3.

Where a member of the public is involved in an incident or sustains injury through an accident and the accident/incident is witnessed either by a member of staff or the City Council's service provider, the accident/incident must be in accordance with the procedures in Appendix 3. Members of the public will be encouraged to report accidents/incidents to the Parks Ranger Service Control Room by use of the telephone number displayed on information boards at site access points.

First Aid Provision at Open Water Sites

Except where there is a permanent staff presence on a site where there are areas of open water and at which first aid provision will be determined by a risk assessment, no first aid provision is made.

First aid equipment, in accordance with the standards set out in the current First Aid at Work Approved Code of Practice, is carried on all Local Services vehicles.

Ice on Open Water

When ice develops on open water at its sites Parks & Nature Conservation will ensure that appropriate and adequate warning signs as shown are displayed at all access points and near to the water's edge. The location of such signs will be to ensure that they give a clear warning of danger to visitors to the site. The service provider or other nominated officer will be responsible for the replacement of warning notices as required. The management of rescue equipment during icy conditions is addressed in Appendix 1.



Where standard notices are part of life buoy stations these will display the ice warning.

When ice forms on lakes within busy public parks it is Parks & Nature Conservation policy not to break ice as it forms.

Use of Open Water for Activities

Where a group or organisation wishes to use an area of water for an approved activity, an application must be made, in writing and on the approved application form, to the Head of Parks. Parks and Nature Conservation or the officer nominated by the Head of Parks. This does not apply to normal operating arrangements of clubs using water by licence, lease or any other similar formal arrangements.

Applications must be made at least 12 weeks in advance of the proposed activity/event. The event organiser will be responsible for ensuring that all aspects of the site's Normal Operating Procedures (NOP) and Emergency Action Plan (EAP), as they relate to the activity, are incorporated into their own event information.

Copies of these documents will be made available to all staff either work at or will have access to a site with an area of open water and will be made available to any person or organisation wishing to use the site for an organised activity. (Details of the general contents of the NOP and EAP are contained in Appendix 2.)

In circumstances where the site has authorised organised club based activities the areas of open water to be used for activities should be through local arrangements with the club or organisation to ensure that any authorised use is agreed and arranged on specific zoned areas of open water.

The responsibility for the implementation of the policy and for the approval of any water based activities rests with the Head of Parks, Parks & Nature Conservation or other nominated officer.

Open Water Swimming.

The sport of Open Water Swimming is one of the fastest growing water sports in the country. Since it became an Olympic sport in 2008 its popularity has increased year on year. In part this popularity comes from the growth in mass participation events with some 5000 participants taking part over one weekend. Triathlon is another sport that is an exponent of the sport, it is reported that in the 2009 season there were 803 registered races across England, Scotland and Wales accounting for 120,620 participants. Clearly, to accommodate such a large number of events safely requires detailed risk assessment, parameters for operation and detailed procedures for setting up and implementing them. However, not all open water activity is for a special event, a vast majority of the swims in Open Water will take place in training sessions, where the numbers are not available due to the unstructured nature and frequency of the occurrence. (Quote from British Swimming the management of open water swimming.)

Birmingham City Council whilst understanding the growing interest in open water swimming understand that around 85% of accidental drowning's occur at open water sites, many of these drowning's occur due to a lack of knowledge and understanding of open water safety. Therefore the following guidance must be adhered to for any organised open water swimming event to take place. Where a National Governing Body (NGB) event is organised all relevant (NGB) guidance must be followed. Any non NGB open water swimming event must adhere to the following guidance.

- Use of Parks Application must be submitted.
- Environment Agency water tests must be taken on a regular basis also in advance of any open water swimming event regular water testing must be undertaken.
- Provision of qualified open water lifeguards at the correct ratios to the (NGB).
- Water temperature of the pool should be between 11c and 18c dependant on age, acclimatisation and experience.
- A method of communication between the event management must be in place also available communication to enable contact with emergency services should they be required.
- Suitable and sufficient lifesaving equipment should be readily available for trained persons to use inclusive of (AED) first aid kits and blankets should also be made available.
- Marker buoys and boundaries must be set inclusive of depth markers.
- Changing and shower facilities must be made available for swimmers allowing all participants to shower minimising the risk of any potential Water Bourne health issues.
- Organiser may consider the use of reef shoes to protect all participant's feet if there is any doubt of underwater debris in the pool.
- The organised event must have an activity manager/supervisor who will be responsible for event safety and must have suitable open water/lifesaving qualification and experience.
- The use of spotters is recommended to support lifeguards.
- Visual sweep of the area to identify any sharps or debris within the event area. Removal of needles should only be undertaken by trained persons.

The above guidance is not exhaustive and other additional elements may be required subject to the site and activity risk assessment, the event risk assessment will be considered by qualified experienced individuals as part of the Safety Advisory Group process following any application through the use of parks application system.

Work on or near Water

In circumstances where employees are required to work on or supporting employees carrying out such duties or activities on open water or rivers, buoyancy aids manufactured in accordance with EN393:1994 must be provided. In accordance with the above a minimum of two staff must be involved when the use of water craft is required.

A suitable and sufficient risk assessment must be undertaken before any such work

Or other activities are undertaken.

Provision and Use of Boats and Other Craft

Where boats or other craft are provided for hire by members of the public or for use by members of staff, such craft will be purchased to meet all current appropriate standards and will be maintained in good order.

Provision of Buoyancy Aids (Public)

In circumstances where or members of the public use water craft provided by Parks & Nature Conservation or service providers, buoyancy aids manufactured in accordance with EN393:1994 must be provided. Where children use such hire craft, the wearing of buoyancy aids is mandatory. Adult users must be strongly advised to wear buoyancy aids.

Where it is proposed to introduce new equipment, we will ensure that there is full discussion and consultation with Parks and Nature Conservation Safety Advisor and relevant associated organisations.

Sustainable Drainage (Suds and the National Planning Policy)

The National Planning Policy framework sets out the expectation for new developments should be sustainable and should avoid flood risks to people and property, and manage any residual flood risks.

Many Park sites are currently in use or are to be used to support the above, the flood risk within such sites needs to be managed effectively and consideration must be given to the current and ongoing risks when accommodating flood water on site, the factors will include location and the length of time the water will be present, this is critical to water safety for all site users, therefore as no site can be considered generic, individual assessments of all sites involved in flood elevation schemes will be required. All relevant parties should be involved in this process to provide a suitable outcome for all with the project.

Further Guidance:

Please refer to questionnaire in (Appendix 4.)

Please refer to Birmingham City Councils:

(Sustainable Drainage: Guide to Design, Adoption and Maintenance Document)

APPENDICES

Parks & Nature Conservation**Open Water Rescue Provision****Guidance on the provision of life buoys**

We recognise the value of providing life buoys at appropriate locations around all areas of open water. The location of life buoys are determined as a result of a risk assessment to ensure that they are provided at points where they may be easily accessible by any person who needs to use them for rescue purposes.

In determining the positioning of life buoys, particular attention is paid to locations where there have been previous incidents, fast flowing water and the presence of very steep banks in areas accessible to the public.

It is generally recognised that:

Life buoys may be provided at strategic intervals around all of the areas of open water managed by Parks & Nature Conservation. (Guide 200 metres)

Vandalism and theft represents both a risk to members of the public in the event that an in-water incident arises and also a severe financial burden to the Birmingham City Council when replacement becomes necessary.

Life buoys are intended to be dropped into the water from a height or thrown a short distance to a casualty who is in the water. In severe winter conditions, the water surface on most lakes and ponds freezes. These conditions significantly reduce the value of life buoys as rescue devices.

Life buoys provided in such situations act as an attraction to vandals as they can be projected across the surface of the ice to a point where their recovery represents a risk to staff or others venturing onto the ice.

In situations where members of the public may choose to ignore warnings and venture onto the ice, they are likely to break through the surface within a few feet, and therefore reaching or wading distance, of the edge given the profile of the lake bottom adjacent to the edge.

In periods of sustained ice on pools the Parks & Nature Conservation Safety Officer together with Parks and Nature Conservation Safety Advisor will review the provision of life buoys at sites where they are thrown onto the ice.

Water Safety Policy
Site Operating Procedures

Normal Operating Procedures (NOP)

Parks & Nature Conservation Normal Operating Procedure will contain, as a minimum, the following information:

- Details of all areas of open water at the site
- A plan of the site
- Potential hazards and risk factors
- Managing visitors to the site
 - water safety information
 - controlling access
- Location of any available first aid supplies
- Special conditions and supervision requirements relating to the use of the water for activity groups
- Details, maintenance and location of all emergency equipment
- Staffing arrangements
- Systems of work for all staff and volunteers
- Training requirements for all staff and volunteers

Emergency Action Plan [EAP]

Parks & Nature Conservation Emergency Action Plan for all open water facilities will contain, as a minimum, the following information:

All action to be taken in the event of any foreseeable emergency to include -

- Drowning
- In water rescue
- Public disorder
- Notification of a first aid or other medical emergency
- Identification of water pollution

If you wish to view the EAP or NOP for any particular site or open water these are held by the Parks and Nature Conservation District Park Managers.

Parks & Nature Conservation**Emergency Accident/Incident Reporting Procedure**

Should any of the following work related accidents/incidents occur to an employee or other person within your area of responsibility

- A person is killed or suffers a major or serious injury requiring urgent medical treatment from a Doctor or at a hospital
- A member of the public or other person is killed or taken to hospital for urgent medical treatment
- A Dangerous Occurrence occurs on a site under your control e.g. collapse of a scaffold, explosion, release of toxic gas etc

THE PRIORITIES FOR DEALING WITH ANY SERIOUS ACCIDENT/INCIDENT ARE:

- Treatment of casualty
- Make the site/area safe to prevent further accidents/incidents. Other than essential work to isolate the area the scene should be left undisturbed until the accident has been investigated
- **NOTIFY PARKS CONTROL ON 454 7810 WHO WILL THEN:**
 1. Notify duty officer (out of hours)
 2. Duty Officer to determine the call out of Safety Advisor/District Park Manager on call.
 3. Determine call out of Ranger Services Manager or Deputy (office hours & out of hours)
 4. If appropriate Parks Control will contact alternative Senior Managers within the Parks & Nature Conservation on the advice of the Ranger Services Manager or Deputy
 5. Parks Control will have a list of alternative Senior Managers and Contact Numbers

GUIDANCE NOTE**Open Water Emergency Incidents**

To ensure all staff members (Birmingham City Council/external service providers) are responding consistently to open water emergency incidents, which include members of the public swimming/paddling, or any other unauthorised water activity, please follow the procedure below.

1. If unauthorised user(s) is in immediate danger, contact Parks Control Room on (0121) 454 7810 for emergency services support. Calling 999 should take preference if contact with the Control Room is via telephone. If radio equipment is available stay at the scene and go through Control Room who will contact emergency services.
2. In any event, contact Parks Control on (0121) 454 7810 to record the incident, giving as many facts/details as possible.
3. If unauthorised user(s) is not in immediate danger attempt to “call in” the unauthorised user(s), stating the dangers, and the City Council’s policy to unauthorised open water use.
4. After a period of time if the unauthorised user(s) are still in the water, make further contact with the Control Room, to seek further assistance. The Control Room will contact the emergency services.
5. At no time should you leave the incident until
 - (a) You are relieved by another member of staff, OR
 - (b) For a short period of time to make contact via the nearest telephone, then return to incident, OR
 - (c) If the incident has been resolved.
6. **DO NOT, AT ANY TIME, PLACE YOURSELF IN ANY DANGER. ALWAYS USE RESCUE EQUIPMENT PROVIDED.**

NB Report, when possible, to your Line Manager
Parks Control Room will determine the call-out of a Safety Advisor and/or Senior Officers.

SUDS FEATURES IN PARKS OR OPEN SPACE

QUESTIONNAIRE

In order to help us assess the safety and management implications of any SUDS proposals located in POS and whether permission can be granted for such a feature please answer the following questions:

1. Type of SUDS feature to be located in Public open space or Housing Amenity of other BCC land?

2.

Swale Underground tank Attenuation basin

Balancing Pond Rain garden Other (please state)

3. What is the maximum area of the feature in sq. m?

.....

4. What is the feature draining?

Surrounding Housing Surrounding Commercial or Industrial Run off from surrounding POS Other please state

5. What is the maximum flood depth of the feature?

Under 150mm 150 to 300mm 300 to 500mm 500 to 750mm

If above 750mm please state

6. How long will water be retained in the feature after a flooding event?

Up to 12 hours 12 to 24 hours More than 24 hours (please state)

If permanently please state the depth

7. What is the bed level of the feature?

.....

8. What is the reason for location of the SUDS feature within the POS ?

.....

9. What frequency of maintenance access will be required for the feature?

Weekly Monthly Annually

10. Who is to be responsible for the maintenance of the feature?

BCC Developer

11. How will the maintenance of the feature be funded?

Development Agreement Commuted Sum other please State

About You

Name		
Company		
Address	Position	Contact details
Please state address of BCC POS		

Any names of BCC/ Parks officers with whom the feature has been discussed



Birmingham
City Council

Thanks for your time!

Please return to: Birmingham City Council Relevant Client Officer.