



Southampton City Council Policy Management of Open Water Sites

Statement of Intent

Southampton City Council (the Council) places significant importance on the health, safety and welfare of staff, residents, visitors, the public and others who may be affected by its business. It is considered essential that management and staff should work together positively to achieve an environment compatible with the provision of the highest quality services where health hazards to staff, residents, visitors, the public and others are minimised so far as is reasonably practical.

In developing this policy it has been established that the Council's current approach to open water safety is generally sound. As such this policy and the arrangements contained within will make little significant difference to existing management and provision. The new policy does however formalise the Council's approach to open water safety offering consistency across the Council.

The Council's approach to water safety is on the basis that people are responsible for their actions and safety where hazards are considered obvious. The Council will take measures to protect the public where indicated through risk assessment, where hazards are not obvious and/or where there is an increased chance of entry to deep and/or fast flowing water from an adjacent public facility such as a constructed path or viewing area. This may include the provision of barriers and other control measures as appropriate. The Council will ensure that all sites with open water have recorded risk assessments which are thereafter subject to review.

Open water risk assessments will be reviewed:

- if there has been a significant change
- if there is reason to suspect the risk assessment is no longer valid
- if there has been an incident/accident or near-miss
- at a frequency not exceeding four years

Relevant SCC Services and the Highways Services Partnership (HSP) 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 for which SCC is responsible, are maintained in a safe condition for the benefit of users.

Southampton City Council 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

vide organisation that have satisfied health and safety criteria set by Southampton City Council.

Mike Harris
Chief Executive

Southampton City Council

Signed:



Dated: 2nd October 2023

Cllr Satvir Kaur
Leader of The Council

Southampton City Council

Signed:



Dated: 6/10/23

This Management of Open Water Sites Policy is signed on behalf of the Council's Executive Management Team.

Review due: August 2024

This statement must be readily accessible. A full copy of this policy including Organisation and Responsibilities, Arrangements and Safe Working Procedures can be found on the Health and Safety Intranet.

Arrangements for Managing Open Water Sites for SCC Premises Including Maintained Schools

Version Control

This document is issued and managed by Corporate Health and Safety Service.

Version Number	Date	Amendments
1.00	2019	New policy
1.01	May 2021	Policy updated for signing by new leader of the council
1.02	May 2022	<ul style="list-style-type: none"> • Policy updated for signing by CEO and leader of the council. • 5.3 – amended to remove annual requirement. • 6.1 & 9.2 City Services amended to Responsible Managers. • Appendix 1 – remove reference to City Services. • Removed previous sections 16 & 17 as not relevant currently for SCC operations. • Amendments suggested by R&I regards reasonable measures and liability issues.
1.03	Aug 2023	Reviewed.
Review Conducted	Next Review Date	
	December 2020	
May 2021	May 2022	
May 2022	May 2023	
Aug 2023	Aug 2024	

Content

1. [Foreword](#)
2. [Safety Criteria for Management and Design](#)
3. [Design Facilities Adjacent to Open Water](#)
4. [Environmental Management](#)
5. [Risk Assessment](#)
6. [Safety Inspections Hazard Identification](#)
7. [Supervision of Open Water Sites](#)
8. [Rivers and Brook Courses](#)
9. [Rescue Equipment](#)
10. [Provision of Information](#)
11. [Reporting of Accidents and Incidents](#)
12. [First Aid Provision at Open Water Sites](#)
13. [Ice on Open Water](#)
14. [Use of Open Water for Activities](#)
15. [Work on or Near Water](#)

Appendices

1. [Open Water Rescue Provision](#)
2. [Site Operation Procedure](#)
3. [Emergency Accident/Incident Reporting Procedure](#)

1. Foreword

- 1.1. Southampton City Council is responsible for sites across the city which contain or include varied open water features. These include parks and public open spaces, vehicle and/or pedestrian bridges and man-made structures, river banks, coastal and estuary foreshores. These sites incorporate a range of open water features which enhance the environment for the enjoyment of people of all ages. These range from large lakes, ponds, pools, rivers through to tributaries which flow from small streams into fast flowing rivers like the river Test and Itchen. SCC also has responsibility for a number of culverts which are mostly managed through the Highways Services Partnership (HSP).
- 1.2. These features however present a potentially significant risk to persons in summer when hot weather makes swimming in cold water attractive; and in winter when people are attracted to and may put themselves at risk by walking on ice over deep water.
- 1.3. Southampton City Council through their risk assessment process will do all that is reasonably practicable to protect people from harm.

2. Safety Management and Design Considerations

- 2.1. Where work is proposed or carried out to open water, for example de-silting, water edge treatment etc.
- 2.2. Before such work is undertaken a number of design factors will be taken into consideration and risk assessments reviewed.
- 2.3. **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.
- 2.4. Where the water edge is open and accessible and is to remain so, the edge profile should be graded appropriately.
- 2.5. It is recommended that shallow water (less than 0.66m) should be extended a minimum of 2m from the water edge, via 1:3 gradient, and a further protective margin of 1.75m with depths from 0.65 to 1.36m via a 1:2.5 gradient.
- 2.6. **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.
- 2.7. **Steep gradients**; where a steep gradient slopes down into open water and where practicable, dense vegetation should be allowed to grow naturally or planted to prevent visitors reaching the water.
- 2.8. **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.
- 2.9. **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.
- 2.10. 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.

3. Design Facilities Adjacent to Open Water

- 3.1. 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.
- 3.2. Corporate Health and Safety Service may be used by designers for advice or consultation to ensure the safety of all users of the facilities and staff employed to maintain the completed facility.

4. Environmental Management

- 4.1. 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 Operations Manager (Parks & Open Spaces) or Representative for the appropriate action to be taken.
- 4.2. It is often the case that the Environment Agency will report the presence of blue green algae to Southampton City Council. 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.

5. Risk Assessment

- 5.1. Managers responsible for open water sites are responsible for carrying out a 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 SWP Risk Assessment.
- 5.2. Where a risk assessment has identified areas known to be attractive for swimming, additional controls measures will be considered which are specific and proportionate to each site taking into account additional factors, environment, etc.
- 5.3. All open water risk assessments (including reviews thereof) will (where reasonably practicable) be undertaken before the school summer holidays and any recommendations from the risk assessments actioned within a reasonable timescale.

6. Safety Inspections/Hazard Identification

- 6.1. Responsible managers will undertake routine safety inspections of open water sites and will update/amend/review risk assessments accordingly.
- 6.2. The highways inspector as part of a walked inspection of any highway shall routinely address any issues. Highways inspections with regards open water shall be limited through contract.
- 6.3. Where rescue equipment is deployed recorded inspection of such equipment will be carried out at a frequency determined through risk assessment or manufacturers recommendation.
- 6.4. The results of all inspections will be recorded and records will be maintained by the Manager responsible for the site. Ad-hoc audits on the provision of rescue equipment may be undertaken by the Corporate Health and Safety Service.
- 6.5. Safety inspections will monitor:
 - The provision of rescue equipment
 - Safety signs and other information notices

- Condition of the water and surrounding edges/banks

6.6. 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 Manager responsible for the site will be notified as soon as possible.

7. Supervision of Open Water Sites

7.1. 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.

7.2. 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, including having in place appropriate liability insurance arrangements.

8. Rivers and Brook Courses

8.1. In circumstances where rivers or brook courses run through or alongside parks and public open spaces under normal conditions the depth of water is reasonably predictable being either tidal or freshwater river. In flood conditions the risk to users of the sites may significantly increase. It is not practical to sign or provide lifebuoys for all sites where rivers, brooks and culverts flow, in the event of such storm or flood conditions the use of temporary signage, barriers or the local media may be used to highlight the potential increased risk to possible users of these sites.

9. Rescue Equipment

9.1. SCC shall where identified through risk assessment make available around all areas of open water and bridges, life buoys in solid and highly visible mountings. The locations of the rescue devices will be determined through 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.

9.2. SCC will inspect life buoys and housings on a regular basis; the results of these inspections should be recorded. Where vegetation around 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, Responsible Managers or Highways (Balfour Beatty) will ensure that

replacement equipment is made available as soon as possible after the shortfall is discovered.

- 9.3. 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 might reasonably be expected to have access to such equipment will receive appropriate training as to its use.
- 9.4. Where persistent vandalism occurs the use of alternative anti vandal lifebuoy stands may be considered. Where persistent problems of vandalism to lifebuoys or where lifebuoys are stolen reasonable action will be taken to replace such equipment, allowing for one spare buoy per housing.

10. Provision of Information

- 10.1. SCC recognises that the provision of appropriate and suitable 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.
- 10.2. Information is made available in a number of ways:
 - **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 in accordance with the recommendations of the RoSPA National Water Safety Committee are displayed in areas where there is a particular hazard. In addition, nagging signs/stickers may also be displayed in the centre of life buoy stands (where deployed through risk assessment) repeating this information.

11. Reporting Accidents and Incidents

- 11.1. 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 written procedures, a summary of which is included in Appendix 3.
- 11.2. 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 dealt with in accordance with the procedures in Appendix 3.

12. First Aid Provision at Open Water Sites

- 12.1. 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.

13. Ice on Open Water

- 13.1. When ice develops on open water at its sites SCC shall take all reasonable measures to provide appropriate and adequate warning signs 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.
- 13.2. 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.
- 13.3. Where standard notices are part of life buoy stations these will display the ice warning.
- 13.4. When ice forms on lakes within busy public parks it is City Services policy not to break ice as it forms.

14. Use of Open Water for Activities

- 14.1. 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 City Services or the officer nominated by the Head of Service. This does not apply to normal operating arrangements of clubs using water by licence, lease or any other similar formal arrangements.
- 14.2. Applications must be made at least 12 weeks in advance of the proposed activity/event.
- 14.3. The event organiser will be responsible for ensuring that all aspects of the site's Site Operating Procedures (SOP) and Emergency Action Plan (EAP), as they relate to the activity, are incorporated into their own event information.
- 14.4. 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 SOP and EAP are contained in Appendix 2.)
- 14.5. 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.
- 14.6. The responsibility for the implementation of the policy and for the approval of any water based activities rests with the Service Lead - City Services or other nominated officer.

15. Work on or near Water

- 15.1. 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.
- 15.2. A suitable and sufficient risk assessment must be undertaken before any such work or activities are undertaken.

Appendix 1

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 (subject to risk assessment) at strategic intervals around all of the areas of open water. (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 Southampton 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, Responsible Managers will review the provision of life buoys at sites where they are thrown onto the ice.

Appendix 2

City Services Water Safety Policy, Site Operating Procedures (SOP)

City Services site operating procedures 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

Appendix 3

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 departmental site under your control e.g. collapse of a scaffold, explosion, release of toxic gas etc.

All accidents and incidents are reported as per SWP – Accident/incident reporting & investigation (see [Safe Working Procedures](#)).

If there is a fatality then contact Corporate Health and Safety Service on Mobile Tel No 0770 536 836 (this is a 24 hour emergency number).

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 District Operations Manager (office hours) or Duty Supervisor (out of hours)
- If appropriate Parks and Street Cleansing District Operations Manager / Duty Supervisor will contact alternative Senior Managers within Parks & Street Cleansing.
- Parks and Street Cleansing District Manager / Duty Supervisor will have a list of alternative Senior Managers and Contact Numbers

Guidance Note

Open Water Emergency Incidents

To ensure all staff members (Southampton 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.

- If unauthorised user(s) is in immediate danger, contact the emergency services for support. Calling 999 should take preference if contact with the Team Leader is via telephone.
- In any event, contact to record the incident, giving as many facts/details as possible.
- 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.
- After a period of time if the unauthorised user(s) are still in the water, make further contact with your Team Leader, to seek further assistance. The Team Leader will contact the emergency services.
- At no time should you leave the incident until
 - You are relieved by another member of staff, OR
 - For a short period of time to make contact via the nearest telephone, then return to incident, OR
 - If the incident has been resolved.
- **DO NOT, AT ANY TIME, PLACE YOURSELF IN ANY DANGER. ALWAYS USE RESCUE EQUIPMENT WHERE PROVIDED.**

NB: Report, when possible, to your Team Leader / Line Manager

The Team Leader will determine the call-out of a Safety Advisor and/or Senior Officers.

1. Main Legislation Relevant to This Document

- 13.1 [Health and Safety at Work etc Act](#)
- 13.2 [The Management of Health and Safety at Work Regulations](#)
- 13.3 [Construction, Design and Management Regulations 2015](#)
- 13.4 [Personal Protective Equipment Regulations](#)
- 13.5 [Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 2013](#)

2. Contact Address's and Guidance Links

- 14.1 Health and Safety Executive www.hse.gov.uk
- 14.1 Department for Education
www.education.gov.uk/schools
- 14.2 Corporate Health and Safety Service
 - 14.3.1 [Health and Safety Intranet](#)
 - 14.3.2 [Health and Safety for Schools](#)