



2013

# BEST PRACTICES FOR LIFEGUARDS

## **A Guide to Policy Development**

**For Lifeguard Public Safety Services  
Operated by the Membership of the**

**Public Agency Risk Sharing Authority  
of California**

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# ABOUT THESE BEST PRACTICES

## **Purpose and Intent**

This document strives to assist lifeguards, supervisors and their administration in developing policies and operating protocols that conform to industry standards and best practices. The document is also intended to assist providers of lifeguard public safety services with knowledge regarding minimum standards and legal requirements as they are applied to lifeguards and their supervisors. It represents a good faith effort by the author to be accurate and to include the most basic and relevant information regarding these standards. It is not meant to be all inclusive and may include errors and omissions despite the good faith efforts of the author to be as accurate as possible.

## **Definitions**

Definitions appear at the end of this document where further emphasis or explanation is required or where terminology across the aquatics field is not universal. Defined terms are in bold-face type the first time they appear.

## **Rationales:**

Rationales are provided for some complex topics that may require clarification.

## **Footnotes:**

Footnotes are provided to identify source materials and locations. In some cases links to web addresses are also provided. Web addresses may change and links may not work in the future but are provided initially to assist the early readers of this document.

## **Appendix:**

Sample documents are provided as a guide toward development of similar documents specific to your facility.

# SECTION 1 – THE LIFEGUARD TEAM

## STRUCTURING AQUATIC POSITIONS

All aquatic positions require working with your organization's human resources department to conduct an analysis of the job and develop a written job description. Even though many of these positions may be part-time and/or temporary, such an analysis demonstrates care and attentiveness to a critical public safety function. While the analysis and description may not be as lengthy as those devoted to full time equivalents, they nonetheless should be thorough and detailed as necessary. Job descriptions should be available within the facility's **policies and procedures manual** so that the entire aquatics team is aware of the important role each position performs.

***Rationale:** A successful aquatics program is dependent on a qualified staff to achieve its goals. In certain cases, minimum qualifications are set by California law. Additionally such a program requires decision making authority within a well communicated hierarchy which also provides a path to all staff for self-improvement and individual success.*

### Job Descriptions

The job description serves a variety of important human resource functions. But for the aquatic staff specifically, they serve to:

- Establish consistent hiring criteria
- Establish performance standards and expectations
- Illustrate a potential career path to employees when other job descriptions (opportunities) are shared.

This document is not intended as instruction on how to write a job description. Your organization's human resource professionals should be contacted for guidance and assistance and compliance with your procedures. However, what is provided are some of the unique aspects that should be included for aquatic positions.<sup>1</sup>

### Lifeguard Requirements

The job description should list the qualifications for lifeguards and that list should minimally include the current legal requirements<sup>2</sup>. To date, such requirements are:

- Current certificates from an American Red Cross or YMCA of the U.S.A. lifeguard training program, or have equivalent qualifications, as determined by the **California Department of**

<sup>1</sup> While this document's focus is primarily lifeguards, the position of swimming instructor is included here as it is also regulated by the CA Health & Safety Code and should be complied with in mitigating potential risks.

<sup>2</sup> CA Health & Safety Code, section 116028

**Public Health (CDPH).<sup>3</sup>**

- First Aid
- CPR for the professional rescuer. This includes techniques and procedures for adult, child and infant that are above and beyond what is taught to the lay public.

The American Red Cross (ARC) Lifeguard certification as of 2012 is an all-inclusive certification that includes Lifeguarding, First Aid, CPR/AED for the professional rescuer and is good for two years.

The YMCA of the U.S.A. as of 2011 is an all-inclusive certification that includes Lifeguarding along with separate ASHI (American Safety & Health Institute) certificates for First Aid, CPR/AED for the professional rescuer and Oxygen Administration. All certificates are good for two years except for the ASHI CPR/AED for the professional rescuer and Oxygen Administration which is only good for one year. Because of the difference in validity between the Y lifeguard and the ASHI CPR/AED for the professional rescuer, you could have the lifeguard certificate current, but the CPR/AED for the professional rescuer expired. It is important to note that the YMCA of the U.S.A. lifeguard certification is not valid without a current CPR/AED for the professional rescuer certificate.<sup>4</sup>

Additional First Aid and CPR Training beyond what is listed above is required by law once employed and is commonly known as "Title 22" or "First Aid Standards for Public Safety Personnel".<sup>5</sup> This training and certification will be referenced and more fully discussed in the In-service training section of this document. Since the training must be provided at no cost to the trainee and it is unlikely that any training provider would not charge for such training, most recruits are not likely to have such certification unless it was provided by a previous employer. As it could be discriminatory to require this certification prior to employment, it is recommended that the training is not listed as a requirement within a job announcement. Job descriptions can state the requirement to take the training provided by the employer.

Lastly, there is no requirement that you cannot hire someone as a trainee without any of the certifications listed above and then provide the trainee/employee in house certification training prior to actual

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<sup>3</sup> A number of other national lifeguard training agencies may be considered "equivalent" by the CDPH and confirmation of this equivalency should be obtained in writing directly from the CDPH (NOT the local health department) before accepting these certifications for lifeguard employment.

<sup>4</sup> Y lifeguards can substitute a current American Red Cross CPR/AED for the professional rescuer certificate instead of the ASHI certificate.

<sup>5</sup> CA Health & Safety Code, section 1797.182 and CA Code of Regulations (CCR), 22 CCR § 100005

assignment to duty as a lifeguard. In such cases you should list the physical and other requirements of the position and the ability to pass the certification course. While this approach is typically not common to municipal aquatic operations, consideration for absorbing this training cost could result in a larger pool of qualified candidates than traditional recruiting methods where job candidates are expected to pay for their own training to become qualified for the lifeguard job. Today, many potential candidates have more demands for their time, have less financial resources, and more options for employment that do not require personal investment in training. Such circumstances create more challenges for lifeguard recruitment which may require new approaches.

### **Instructor Requirements**

When there is no separate lifeguard service during periods of aquatic instruction, then at least one instructor that also meets the certification requirements for lifeguard must be in attendance continuously during the instructional period.<sup>6</sup>

The practice of providing aquatic instruction by a person who is also a lifeguard without separate lifeguard service is called “**dual supervision**”. This is extremely risky and although the state health code allows for it, it is not recommended. This includes competitive water sport clubs whose coach is also a lifeguard. There is no possible way that any instructor or coach can fulfill the duties of a lifeguard and adequately provide coaching or instruction at the same time. Most often the lifeguard duties become secondary to the perceived primary instructional duty. This practice can result in drowning. Additionally, both the American Red Cross and the YMCA of the U.S.A. recommend against dual supervision and require separate lifeguard services for their instructional programs as well as during competitive practices and competition. Whenever there are persons engaged in water contact activities there should be a separate lifeguard on duty whose sole responsibility is to superintend the safety of those persons and has no other duty to distract him or her from the lifeguard function.

However, should you recruit instructors or coaches who will conduct water contact activities without a separate lifeguard on duty, then you must recruit at least one instructor or coach to be in attendance, who has the lifeguard certifications. The job description should list those qualifications. To date, such requirements are:

- Current certificates from an American Red Cross or YMCA of the U.S.A. lifeguard training program, or have equivalent

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<sup>6</sup> CA Health & Safety Code, section 116033

qualifications, as determined by the CA Department of Public Health (CDPH).<sup>7</sup>

- First Aid
- CPR for the professional rescuer. This includes techniques and procedures for adult, child and infant that are above and beyond what is taught to the lay public.

### Essential Functions and Duties

This portion of the job description contains clear precise statements of the major tasks, duties and responsibilities performed. Lifeguards are asked to perform a number of job functions that may have little to do with the primary function of saving lives. It is highly recommended that the job description group **primary duties** separately from **secondary duties**. For guidance on this distinction, see your chosen **training provider's** instructional materials. Many lifeguard job descriptions have left out the most important primary function of all, so don't forget to include statements regarding performing needed rescues and basic life support.

### Job Specifications

This portion of the job description states the qualifications needed to perform the job and are typically stated as skills, knowledge or abilities. This is often the most neglected portion of the lifeguard job description. Below are some suggested specifications that may or may not apply to your specific lifeguard positions, but should give you an idea of the type of skills typically needed.<sup>8</sup> Again, your human resources department should approve your job specifications and they must be related specifically to your job.

- Remain alert, with no lapses in consciousness.
- Able to sit for extended periods of time, including in an elevated chair.
- Able to move to various locations, including in and around an elevated chair.
- Communicate verbally, including projecting the voice across distances.
- Verbally communicate swiftly and effectively with emergency personnel over telephone and in person.
- Hear noises and distress signals in an aquatic environment, including in water, understanding that significant background noise exists in aquatic environments.
- Observe all sections of an assigned zone or assigned water area.
- Perform all needed rescues and basic life support skills.
- Meet rescue requirements for maximum water depth. For example,

<sup>7</sup> A number of other national lifeguard training agencies may be considered "equivalent" by the CDPH and confirmation of this equivalency should be obtained in writing directly from the CDPH (NOT the local health department) before accepting these certifications for lifeguard.

<sup>8</sup> Adapted from "Enjoying Water Wisely, Aquatic Safety Guidelines for Ys", May 2011.

“Ability to rescue a person from depths of up to 17 feet.” (Your facility must have a depth of 17 feet to make this specification valid for your job. This specification can be adjusted up or down.)

- Meet strength and lifting requirements. For example, “Ability to lift 30lb bags to stack and store”, if you require this duty.
- Think in the abstract, solve problems, make decisions, instruct, evaluate, supervise and remember.

### **Department of Labor Regulations for Minors**

The Fair Labor Standards Act (FLSA) as well as California child labor laws govern the employment of minors (less than 18 years of age). If you hire minors as lifeguards you must abide by these laws.<sup>9</sup> The list below is only an abbreviated list of the most pertinent requirements. Please see the actual law or consult with your human resources professionals for additional guidance and help when hiring minors.

- The minimum age for a lifeguard is 15 years of age
- They must be trained and certified by the American Red Cross, or a similar certifying organization, in aquatics and water safety
- The employer must meet all work rules for work conditions and all restrictions on the number of hours and times of day worked. These restrictions vary during the time when enrolled in school and not in school.
- 15 year old lifeguards shall not enter or work in any chemical storage areas, including any areas where the filtration and chlorinating systems are housed
- 15 year olds may NOT be employed as lifeguards at the top of elevated water slides
- Youth under 16 years of age may NOT be employed as lifeguards at natural environment facilities such as: rivers, streams, lakes, ponds, quarries, reservoirs, wharfs, piers, ocean-side beaches

In addition to these requirements minor lifeguards must meet all other requirements for lifeguards under the California Health & Safety Code and other regulations as described previously. Additionally 15 year olds who are employed to teach or assist in teaching others how to swim must also be certified as swimming instructors by the American Red Cross or some other similar certifying agency.

### **Aquatic Supervisor Requirements**

Ensure that **aquatic supervisor** or **pool manager** positions require the skills necessary to not only provide supervisory leadership, but also the ability to

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<sup>9</sup> US Dept. of Labor, Wage and Hour Division, Fact Sheet 60  
CA Dept. of Industrial Relations

train and maintain a qualified and certified lifeguard staff. Suggested certifications include:

- Current certificates from an American Red Cross or YMCA of the U.S.A. lifeguard training program, or equivalent to requirements for lifeguards
- First Aid
- CPR for the professional rescuer. This includes techniques and procedures for adult, child and infant that are above and beyond what is taught to the lay public.
- **Aquatic Facility Operator (AFO) or Certified Pool Operator** or equivalent
- Lifeguard Instructor certification or equivalent
- First Aid Instructor certification or equivalent
- CPR for the professional rescuer Instructor certification or equivalent
- Instructor trainer certificates for any or all of the above are highly desirable

***Rationale:** Instructor level certification allows the supervisor to provide for a robust in-service training program as well as the ability to maintain lifeguard certification through recertification training and refresher courses. Instructor certificates should be in your chosen lifeguard training provider program.*

Instructor level training does not negate the need for basic level certificates. Instructor certification does NOT renew basic level certificates or imply that basic level skills are current. Aquatic Supervisors should have both basic level and instructor certificates.

Ensure that aquatic supervisor positions require demonstrated experience operating and managing an aquatic facility.

## SELECTING QUALIFIED LIFEGUARD CANDIDATES

All lifeguard candidates should be tested for both physical skills and lifeguard knowledge. Physical skill testing is best conducted in the facility where the lifeguard candidate would be working, or if not available, at a facility that is physically similar to the work site. Testing of knowledge can be conducted by a written exam or orally. An oral exam can be combined with a job interview.

***Rationale:** While lifeguard candidates may be able to produce the required certifications to qualify for a lifeguard position, those certificates only indicate that on the day that they were tested in their training program, they met and passed that **training program's** requirements. It does not mean that they have those same abilities one year, two months or even a day later. Further, quality of instruction varies with*

*the variety of instructors and lastly, certifications have been known to have been stolen and/or forged.*

## Interviews

Prior to testing and an interview, candidates should complete your organization's job application. Interviews should be conducted according to your human resources policies. Such policies include reviewing the job application, the types of questions that can legally be asked and procedures on evaluating each candidate's answers. Be sure to obtain a copy of each applicant's certifications and results of physical, written and oral exams if previously conducted. If an applicant is hired, results of the testing, copies of certificates and the application should be placed in the employee's personnel file.

## Testing

The selection process is a series of steps that is designed to give you the best candidates for open positions. Physical skills tests are often conducted first as they are usually a way to narrow the field quickly and thus the argument is to save time. However, physical skills do not always lead a recruiter to the best lifeguards who have maturity, good decision making skills and service centered aptitudes. Those that favor interviews and/or oral testing first, believe that if a candidate is lacking in the physical skills, they are willing to invest in remediation to bring their skills up, whereas the lifeguard who has excellent physical skills cannot always be remediated in maturity, decision making and customer service. The order in which these tests are undertaken is flexible based on your organizational needs or philosophy. There are arguments in favor of conducting the tests in a variety of sequences. Lastly, your human resources department should approve the content of all testing for your positions.

### Written and Oral Testing

Material for written exams can be self-developed especially if your organization has resources to validate the questions. It is however, much easier to use the testing materials from your organization's chosen training provider. For example, you can utilize an American Red Cross Lifeguard Instructor to conduct the lifeguard training exam or an abbreviated portion of it to test each candidate's readiness to assume your lifeguard position. You must also have a secondary plan should a candidate request an oral exam as a reasonable accommodation under the **Americans with Disabilities Act (ADA)**.

Oral exams can be conducted as part of a job interview but it should be made clear when testing is beginning and when it ends.

## Physical Skills Testing

It is important to ensure that all physical skills tests are specifically job related. Adapting your chosen training provider's skill testing to your aquatic facility is a good way to do this. Timed testing is a good indicator of rescue abilities as well as strength and endurance. Maximum amount of time to complete a skill should be reasonably related to a safe and efficient rescue at your facility.

It is also acceptable to require the ability to swim a distance for time, greater than the maximum distance needed to reach a potential victim. For example, if your facility is 50 Meters, you can require a 200 Meter swim for time to test the strength and endurance of the lifeguard. Longer distances could also be acceptable if there is a relevant job requirement or need.

All lifeguard candidates must be able to rescue a person from the deepest point at your aquatic facility. This is especially important for facilities that have deeper diving areas or pools, as candidates may not have had access to such deeper water in their training program. As such the candidate would not have been tested under these conditions and may not physically be able to reach a victim in deeper water. The ability to rescue persons in any area where the lifeguard is responsible is essential and must be tested and verified.

Combined skill testing is highly recommended to simulate real rescue conditions. Tests that include an entry, approach stroke, bringing the victim to safety, removal from the water, primary assessment, CPR/AED, etc. are excellent tests to determine if the candidate has the endurance to physically rescue and provide basic life support to a potential victim without a rest opportunity between the skills.

## Reference and Criminal Background Checks

During the hiring process, you need to make a reasonable effort to learn about and verify the applicant's past.

Reference checks are often overlooked for many lifeguard candidates as some may have little or no work history. However, some have had previous employment and it is important to check these references. Some previous employers may only give out dates worked and job title verification. However, you would not want to find out after hiring, that a lifeguard had trouble staying awake, paying attention or failed to make rescues at his or her place of previous employment. For candidates that have no previous work history, you may have to ask for references from the candidate. Potential references can be teachers, coaches, religious leaders or neighbors. Your human resources

department can provide further instruction and guidance on conducting reference checks and the required documentation.

Criminal background checks are required for most lifeguards and some instructors as they will have supervisory and disciplinary authority over children as part of their job responsibilities.<sup>10</sup> Fingerprints for each applicant must be taken and submitted to the CA Department of Justice (DOJ). The DOJ will return any criminal records which should be assessed by your human resources department. Conviction of specified offenses (mostly sex offenses) would preclude employment for these applicants. Your human resources department should tell you if any individuals cannot be hired because they could not clear the criminal background check. Fees apply to these checks and while the code only requires the state DOJ check, it is highly recommended that the additional fees be paid (payable to the DOJ) for the Federal Bureau of Investigation (FBI) check. The FBI check will reveal conviction(s) in states other than California.

## **ORIENTATION AND PRE-SERVICE TRAINING**

Orientation to the environment and specific organizational policies and procedures should occur prior to a lifeguard's first duty shift. A tour of all work sites including both public and employee areas is essential. Conducting an orientation and pre-service training can take place in a group setting or individually depending on your needs. A facility specific policy and procedures manual should be developed for these purposes as well as for use as a reference tool. The manual will serve as the outline and blueprint to your orientation and pre-service training.

***Rationale:** A policy and procedures manual ensures that all essential topics for successful employment and facility operations are covered and that there is a consistent approach to the orientation across all recruiting classes.*

### **Policies & Procedures Manual**

The manual is facility and organizationally specific, therefore there is considerable variety in the topics included. While the manual should address specific needs, the following topics should be included:

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<sup>10</sup> CA Public Resources Code, section 5164

## Suggested Table of Contents for Aquatic Facility Policies & Procedures Manual

### Personnel

- Job Descriptions (for all positions within the aquatics organizational unit)
- Organizational Chart
- Customer Service standards and conflict resolution
- Scheduling Policy
- Attendance Standards
- On the job Injury and Workers Compensation Reporting
- Time Recording
- Uniforms, dress and grooming standards
- Physical fitness standards and **requalification** and/or **recertification** requirements
- In-service training requirements
- Drills – accident prevention, emergency procedures
- **On site evaluations** (auditing procedures)
- Corrective coaching or progressive discipline procedures
- Performance appraisal
- Personal use of office technology
- Personal mobile device policy
- Visitors
- Alcohol/Drug policy
- Reading/Studying
- Use of Facility after hours
- Complaint procedures – whistle blower, discrimination, sexual harassment

### Job Duties & Procedures

- Opening procedures
- Daily checks
- Water testing requirements, water quality standards
- Water clarity standards
- Inclement weather
- Zones of protection and **scanning**
- **Rotations** and assigned stations
- Maximum capacity
- Closing procedures
- Suspected child abuse reporting procedures
- **Fecal Incident & Vomit procedures**
- Blood and other potentially infectious materials spill clean-up

### Prevention & Safety

- Accident Prevention
- General Danger Areas

- Specific Danger Areas
- Pool Use & Safety Rules and Enforcement procedures
- Lap Swimming-rules, etiquette & safety
- **Personal Flotation Device (PFD)** policy
- **Personal Protective Equipment (PPE)** and **Bloodborne Pathogen Plan**
- Sun Protection Safety and Heat Illness Prevention
- **Material Safety Data Sheets (MSDS)**

### Rescue & Emergency

- Liability of Lifeguards
- Communications – signals, radios, telephone, equipment, facility logs
- First Aid Kits & First Aid Treatment
- **Emergency Action Plan**
- Emergency Telephone procedure and script
- Evacuation procedures
- Missing person procedure
- Use of Rescue Equipment - rescue tubes, backboard, AED, O<sub>2</sub>, **Bag-valve mask**, resuscitation mask, etc.
- Special Rescue procedures – scuba, kayak
- Non-aquatic Emergency Action Plans – power failure, fire/smoke, chemical spill, earthquake, bomb threat, robbery
- Reports - **rescue, incident, injury/accident**

Many of the topics listed in the suggested table of contents above require a significant amount of time and may need a separate training session. In some cases the training is required by law which may prescribe content and time requirements. Such topics include, sexual harassment prevention and complaint procedure<sup>11</sup>, suspected child abuse reporting procedures<sup>12</sup>, fecal incident and vomit procedures, bloodborne pathogens training<sup>13</sup>, heat illness prevention training<sup>14</sup>, right to know training (including MSDS)<sup>15</sup>, and emergency action plan drills. Additionally, except for YMCA lifeguard training, there is no requirement for Oxygen administration skills. However, drowning is an injury which benefits greatly from the administration of oxygen. Oxygen equipment and the ability to deliver supplemental oxygen is highly encouraged. If oxygen equipment is available, then oxygen administration training should be made available to lifeguards who have not had it and added to pre-service training.

<sup>11</sup> Required training for supervisors, CA Government Code, Section 12950.1

<sup>12</sup> Strongly encouraged training by CA Penal Code, Section 11165.7

<sup>13</sup> Required training by Cal-OSHA within the CA Code of Regulations, 8 CCR § 5193

<sup>14</sup> Required training by Cal-OSHA for outdoor workers within the CA Code of Regulations, 8 CCR § 3395

<sup>15</sup> Required training by Cal-OSHA within the CA Code of Regulations, 8 CCR § 5194

## Shadow Lifeguarding

New lifeguards and lifeguards new to a facility can benefit from a period of **shadow lifeguarding**. This is a time when the new lifeguard works with and observes another experienced lifeguard conducting surveillance. The experienced lifeguard can share what he or she is observing during a scan and what hazards may be in the area. This assists the new lifeguard in learning facility procedures and characteristics as well as refining their scanning skills. It is recommended that new lifeguards shadow an experienced lifeguard for at least two shifts prior to assigning the new lifeguard a zone on their own.

## IN-SERVICE TRAINING

Developing a reasonable guideline as to the amount of training needed without going beyond a point where there is little return on the investment is a challenge. However, it is recommended to err towards more training than not enough. There is considerable risk in providing less training than the stated best practice of your chosen training provider. Both the ARC and the YMCA state a best practice of a minimum of 4 hours of in-service training per month.

***Rationale:** Lifeguard skills are complex skills that deteriorate over time, particularly CPR/AED skills. Regular practice and review keeps skills up to date and lifeguards ready to perform when needed.*

### In-Service Training Plan

An **in-service training plan** is not a recertification plan for lifeguards. While maintaining lifeguard certification skills is important, an in-service training plan should go beyond the minimum qualifications to become a lifeguard. An in-service training plan should take the skills learned in the lifeguard certification program and apply them to the specific facility and teach lifeguards how to work as a team. In-service training is team work and involves applying skills to specific emergency action plans and problem solving based on presented scenarios of the type likely to occur as well as unanticipated emergencies. The plan should not include staff meetings where topics other than lifeguard skills or lifeguard special topics are discussed. While such meetings are important for staff communication and are useful tools to review organizational policy, the time to conduct these meetings should not be included as in-service training time.

The plan should outline the topics and skills to be discussed and practiced for the year for year-round facilities or for the season for seasonal facilities, how much time is anticipated to be spent on each topic and who will conduct the training. Skills using specialized equipment, particularly those whose models or type varies or any equipment not covered in your chosen training provider program such as oxygen equipment, AEDs, backboards, rescue breathing

masks and bag-valve masks should be included.

***Rationale:** While lifeguards may have received training on special equipment within their lifeguard training program, such equipment varies from course to course and employer to employer. Lifeguards must receive training in the equipment they will use at the work site.*

Emergency Action Plan drills are vital to the in-service training program as not only do they train lifeguards in your protocols, but they can test the validity and feasibility of the plan. Lifeguards can provide valuable input as to whether the plan is feasible and working. Coordinating with other emergency responders such as police, fire fighters, EMTs and paramedics is also extremely valuable. Training should be conducted under the direction of a lifeguard instructor or by a subject matter expert for special topics such as a public health official, risk manager, human resources professional or attorney.

The training plan as well as all training sessions must be documented. Attendance at in-service training should be mandatory and there should be a plan to make-up the training as soon as possible for any extenuating circumstances. Make-up training must also be documented. Documentation should consist of the date, time and location of the training, topics covered during the training, the time spent on each topic, the name of the instructor(s) and a sign-in sheet for the attendees.

### **Requalification & Certificate Review**

A lifeguard must maintain their eligibility for the job by keeping their certificates current. This is not to say that the supervisor should not assist them in this effort as it helps the supervisor to keep qualified and trained lifeguards. Offering refresher courses, reviews and full certification courses are ways to provide training opportunities that are convenient for lifeguard staff by having them at their work site.

Additionally lifeguards should have to re-take whatever pre-employment testing was required either annually or seasonally. Any lifeguard who cannot pass these tests should be remediated before re-assignment to duty. Each lifeguard must remain physically fit to continue to be qualified for the position.

Supervisors must keep a record of each employee's certification and develop a system for notification of impending expirations. Providing recertification courses or refresher courses to the staff as a whole can relieve the burden by getting most staff on an identical expiration date. However, there will always be some employees depending on when they were hired who will expire outside of your standard expiration date. These staff members should be closely monitored so their certifications do not lapse.

### **First Aid Standards for Public Safety Personnel (Title 22)**

California law has given statutory authority to the Emergency Medical Services Authority (EMSA) to set training standards for lifeguards.<sup>16</sup> The EMSA has a prescribed content requirement for the training.<sup>17</sup> It is to be completed within one year from the effective date of the individual's initial employment and, whenever possible, prior to assumption of regular duty. The training is to be provided at no cost to the trainee. Satisfactory completion of a refresher course is required every three years.

The initial course of instruction shall consist of at least 15 hours of first aid instruction and at least 6 hours of CPR instruction. The EMSA must approve the training program and has identified a list of approved training providers. The ARC is an approved training provider and is the provider that is most available and accessible to the recreation field.

The ARC in California has an approved state developed course targeted to lifeguards. This course supplements the First Aid and CPR training already provided in the ARC lifeguard training program to avoid duplication and reduce the hourly training requirement. Therefore, employees who take this training must have current lifeguard training including current First Aid and CPR/AED for the professional rescuer certificates.

An ARC "First Aid Standards for Public Safety Personnel" training course can be provided prior to the first duty shift or can be incorporated within the in-service training plan provided that it is completed within one year of the initial hire date.

## **DEVELOPING & SUPERVISING**

### **Present Supervision**

As lifeguards are typically young people who have limited workplace experiences, they need active and present supervision. It is a recommended guideline that the person who is charged with the responsibility of hiring, supervising and evaluating lifeguard employees should be on site with lifeguard employees at least 75% of their work day. While it may be operationally necessary to have a pool manager or aquatic facility supervisor report to the organization's administrative offices to perform certain tasks, this should be minimal, so that lifeguards receive the mature on-site supervision needed. It is also highly encouraged that the organization administration meets at the aquatic facility if it is necessary to include the aquatics management staff. This

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<sup>16</sup> CA Health & Safety Code, section 1797.182

<sup>17</sup> CA Code of Regulations (CCR), 22 CCR § 100005

will give them the opportunity to view operations and provide valuable leadership and support.

***Rationale:** Developing and supervising the lifeguard team must be a team effort. The aquatic facility or pool manager cannot do it alone and requires the support of upper management, administration and colleagues who function as part of the **aquatic safety team**.*

It is also recommended to create a position of leadership such as a head lifeguard who is specifically assigned to cover the on-site supervisory duties at the aquatic facility while the pool manager is away. Such a position should be a part of the organizational chart and have clear authority.

### Rescue Readiness

While conducting **surveillance**, ensure that all lifeguards are **Rescue Ready**<sup>18</sup> with the following equipment and systems available and accessible at all times:

- Lifeguards shall wear a uniform which clearly identifies them to patrons as lifeguards.
- One rescue tube for each lifeguard worn at all times while conducting surveillance.
- One communications device (such as a whistle) used to summon assistance shall be worn at all times by each lifeguard.
- One hip pack containing PPE to be worn at all times.
- Emergency call system to notify 911.
- Backboard with a minimum of three body straps and a head immobilization system
- AED.
- Bag-valve masks in various sizes.
- Supplemental oxygen equipment<sup>19</sup>.
- First-aid kit stocked to handle emergencies for a minimum of 10 persons.

Rescue tubes should be worn as designed with the harness over one shoulder and the slack of the tow rope strap gathered in one hand. This is very important to protect the lifeguard from serious injury when having to quickly exit an elevated chair or jumping into the pool from the deck.

### Quick Checks

The on-site pool manager or facility supervisor needs support as they cannot see everything at all times. Every member of the aquatic safety team can perform a **lifeguard quick check** or observational audit of conditions found at the aquatic facility whenever they can be there. Elements of a quick check

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<sup>18</sup> Rescue Ready is a term attributed to the YMCA of the U.S.A. lifeguard training program.

<sup>19</sup> Highly recommended

should be simple enough that if desired, even members of the public can be invited to fill one out if desired.<sup>20</sup>

	Yes	No
• The Lifeguard is easily Identifiable	<input type="checkbox"/>	<input type="checkbox"/>
• The Lifeguard is appropriately dressed (List uniform elements here)	<input type="checkbox"/>	<input type="checkbox"/>
• The lifeguard can see all areas of the pool and is actively watching all swimmers	<input type="checkbox"/>	<input type="checkbox"/>
• The Lifeguard is alert and performing no other duties	<input type="checkbox"/>	<input type="checkbox"/>
• The Lifeguard demonstrates professional posture, attitude and behaviors	<input type="checkbox"/>	<input type="checkbox"/>
• The pool is well maintained and the deck is free of unnecessary clutter	<input type="checkbox"/>	<input type="checkbox"/>

### Professional Development

In order to improve retention and performance, lifeguards need support to stay current, develop new skills and prepare for other aquatic leadership positions. The in-service training plan is critical to this development. Practicing skills with other lifeguards creates familiarity and confidence in themselves and other team members. Coordinating with other public safety personnel such as E.M.T.s, paramedics, fire and police is also important.

Keeping the in-service training program relevant and current is important for aquatic leadership such as head lifeguards and aquatic supervisors. Organizational administration should provide for the continuing education of these positions, where knowledge and information can be brought back and shared with the lifeguard team through the in-service training plan. The California Park & Recreation Society's Aquatic Section is a good resource for training and development. There are also a number of **pool operator groups** throughout the state that regularly meet and provide training programs. Sending aquatic staff to these training opportunities ensures continuing exposure to the latest trends and information for the aquatics field.

### CONDUCTING PERFORMANCE AUDITS

<sup>20</sup> Adapted from the YMCA of the U.S.A.

## Lifeguard On-Site Evaluation

Lifeguards should be trained to expect unannounced observation, testing and evaluation while on duty conducting surveillance. This is sometimes called an **audit** or **on-site evaluation**. The testing and observation can be conducted internally and/or contracted to a service provider. The American Red Cross offers these services as do private consultants and some other national lifeguard training providers. This type of evaluation ensures the readiness of lifeguards to respond in an emergency. Lifeguards are typically evaluated first observationally on appearance, posture, equipment, scanning time and any distractions observed. This portion of the audit is unannounced and the lifeguard should not know that they are being observed and evaluated. Then the auditor or evaluator will reveal their presence and request the lifeguard to perform one or more combined practical skills or rescues. There must be a plan to provide a substitute lifeguard while the original lifeguard is being evaluated. The results of the evaluations are documented and sometimes videotaped. Lifeguards that do not meet prescribed standards must be remediated via additional training and are returned to duty only after a successful re-test.

***Rationale:** Independent evaluations provide an unbiased objective view of both lifeguards and facilities. Additionally they identify needs for improvement and hold aquatic staff accountable for code compliance and changes. Supervisors can learn how staff is performing and identify any training deficiencies.*

## SECTION 2 – SETTING UP LIFEGUARD PROCEDURES

### MINIMUM STAFFING

Commitment to providing a safe environment for patrons requires quality lifeguard procedures. You must ensure that there are enough lifeguards **on duty**, the lifeguards are certified and trained and they are positioned to assist swimmers if needed. With this minimum staffing, one lifeguard can conduct surveillance, while the second is available for assistance in an emergency and interacting with patrons.

Make it a priority to assign at least two lifeguards to a pool to be on duty at all times the pool is in use.

***Rationale:** Lifeguard Training programs train lifeguards using a team approach. Lifeguards need the assistance of other lifeguards to provide basic life support and perform as they were trained. Staffing with at least two lifeguards allows for patron interaction without compromising surveillance.*

Each pool should have a minimum of one lifeguard conducting surveillance whenever patrons are in or near the water.

***Rationale:** Lifeguards cannot prevent or rescue if they are not present. The moment that patrons have entered the facility, there should be at least one lifeguard at waterside conducting surveillance whether or not anyone has entered the water.*

### LIFEGUARD TO PATRON RATIO

California code does not require any lifeguard to patron ratio except in the case of organized camps. Should you have any internal or external organized camp or day camp utilize the facility you must maintain a ratio of one lifeguard for every 25 campers.<sup>21</sup> If campers will share the use of the facility it is recommended that you maintain at least this 1:25 ratio for the entire pool population.

Since there is no state or local mandate specifying the number of lifeguards

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<sup>21</sup> CA Code of Regulations (CCR), 17 CCR § 30741

required, lifeguards and supervisors must determine how many lifeguards they will provide. This gives flexibility in changing ratios with changing environmental factors and other conditions. Factors to consider in developing lifeguard to patron supervision ratios are:

- Size and shape of the pool
- Equipment within the pool such as slides or inflatables
- Number and ages of patrons in the pool
- Skill level of patrons in the pool
- Type of program and/or number of activities in the pool or pool area
- Environmental factors such as sun glare, rain, wind, and shadows from buildings or trees that make viewing areas of the water or bottom difficult
- High use or higher risk areas such as diving boards, wave pools, slides
- Skill level of lifeguards
- Availability and qualifications of other support staff

Because this ratio is self-determined you may be called upon to provide a rationale for your decisions. Ratios should be higher for programs that are not organized activities with additional supervision such as recreational swimming. Ratios should be higher for non-swimmers. Extra lifeguards should be added to areas compromised by any of the environmental factors.

See the discussion below on system coverage and how it affects the number of lifeguards needed.

## SYSTEM COVERAGE

Two types of coverage systems are common for daily operations, **total coverage** and **zone coverage**. Zone coverage is when more than one lifeguard is conducting surveillance. The total area of the pool is divided into zones with overlap of several feet where there is double coverage. There should be no gaps in the coverage (see fig. 1 below). A zone coverage plan should be developed based on the bather load up to the legal maximum capacity. Standard zones should be developed for regularly scheduled programs and activities and should be documented in the policies and procedures training manual. Special zone coverage plans should be developed for special events and non-standard activities as needed. Lifeguards should have a clear understanding of where their zone is and should be able to diagram all standard zones for the pool when asked. Under no circumstances should more than one lifeguard use total coverage, where each lifeguard covers the entire pool. This defeats the benefits of more than one lifeguard and can create lapses in supervision or gaps in coverage.

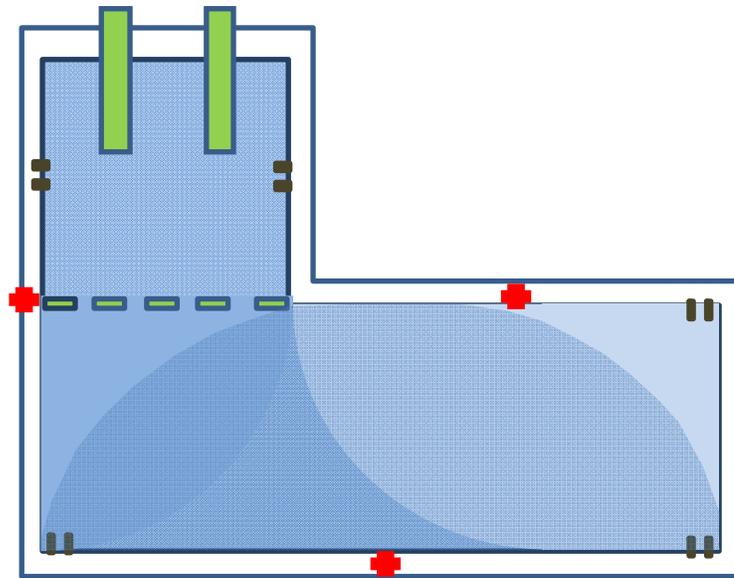


Figure 1 - Typical Zone Coverage At A Pool  
With 3 Lifeguards

Total coverage is when a single lifeguard on surveillance supervises the entire swimming area (see fig. 2 below). This system works best when the area is small and there are few swimmers. This system is difficult to use in a large complex facility, as a single lifeguard cannot usually see the entire area without blind spots and gaps in coverage.

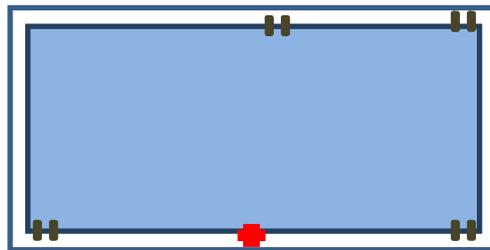


Figure 2 - Total Coverage At A Pool  
With A Single Lifeguard

Zones must be sized based on two factors. Lifeguards must be able to complete a scan of their zone in a reasonable length of time, approximately 10 to 20 seconds and lifeguards must be able to reach a potential victim within 30 seconds. Lifeguards should be encouraged to report whenever they cannot see their entire zone or whenever they feel they are unable to complete a scan of their zone in a reasonable length of time.

Zones for which lifeguards are consistently unable to scan in a reasonable

length of time may be too large and require additional lifeguard support for proper coverage. If a lifeguard cannot see their entire zone and this cannot be mitigated by changing the zones or repositioning the lifeguard, then an additional lifeguard might be needed. If after all mitigating factors, lifeguards cannot see their entire zone in all dimensions, top to bottom, then the pool should be closed. It deserves special mention that even rain without thunder, if it obscures vision to the bottom of the pool will require closing the pool. Water clarity problems that cannot be corrected immediately should also dictate closure of the pool. Lifeguards must receive training and clear authority on the ability to close a pool if they cannot see their zone in its entirety.

Emergency Action Plan drills can also help test the validity and size of zones based on timing the lifeguards' ability to recognize when assistance is needed and ability to respond within 30 seconds. If lifeguards are unable to recognize when assistance is needed within approximately 10 to 20 seconds or are unable to reach a potential victim within 30 seconds, then the zone may need to be reduced in size or lifeguards may need additional training to reduce the time.

Supervisors should evaluate each lifeguard zone daily and seasonally for size and effectiveness as well as monitor the scan times of lifeguards on surveillance. Ensure that each zone is observable for the entire volume of the pool (top, middle and bottom).

## **EMERGENCY COVERAGE**

Emergency coverage is necessary when a lifeguard must leave their station to make a rescue. Remaining lifeguards may need to shift their positions to cover the rescuing lifeguard's zone. This shift is temporary and normal coverage is resumed when another lifeguard can take over this zone or the facility is cleared. Lifeguards should be trained on how to provide emergency coverage and any shift in position that might be required.

## **SURVEILLANCE AND SCANNING**

Lifeguards conduct surveillance by a systematic approach called scanning. Scanning is observing, recording and assessing the condition of the patrons in the assigned zone. Scanning must be vigilant and constant. Lifeguards should have no other duties when conducting surveillance. Lifeguard training providers have suggested exercises and drills for improving this skill that can be incorporated into the in-service training plan.

Lifeguards typically work under conditions which can create fatigue and can cause scanning to deteriorate. Lifeguards should come to work well rested and

avoid both prescribed and over the counter medications which can affect their alertness. While at work lifeguards should:

- Drink plenty of water to stay hydrated
- Maintain good posture
- If outdoors, wear polarized sunglasses that allow peripheral vision
- If outdoors, use protection against sun and wind such as hats, umbrellas, sunscreen
- Rotate tasks and stations so there is a break from surveillance

## ROTATIONS

Lifeguards should rotate regularly to relieve monotony and boredom that occurs with watching the same area for an extended length of time. Rotations are set up on a time system. A lifeguard returning from break begins the rotation by relieving a lifeguard and that lifeguard relieves the next lifeguard until the last rotation occurs and that lifeguard rotates off-duty and gets a short break. In some cases lifeguards are not rotated to a break but to some other task such as taking out trash or checking locker rooms. Rotations should occur at least every 20 or 30 minutes, however, individual facility conditions and weather could affect your rotation schedule. If the rotation does not include a break, another rest or meal period should be factored into the rotation schedule.

Your chosen lifeguard training program prescribes how rotations should take place so there is no lapse in surveillance. Each lifeguard in the rotation should carry their own rescue tube. This procedure should be followed for both deck level and elevated stations. A lifeguard who comes into rotate should communicate with the other lifeguard and let them know that they are taking over surveillance. If the lifeguard being relieved is on an elevated station, this allows them to turn their back to the water in order to climb down. Once on the deck, this lifeguard then communicates to the relieving lifeguard that they have now resumed surveillance and the relieving lifeguard can now turn their back to the water and climb up the elevated station. Once the new lifeguard is properly positioned in the elevated station they can signal to the lifeguard on the deck that they now have surveillance and only then does the lifeguard on deck leave their station. Keep any necessary conversation regarding swimmers or conditions in the zone brief. In determining the order of the rotation, move lifeguards from the most demanding position to either a break period or a less demanding spot.

In larger facilities where there is more than one lifeguard on break, there may be a staggered approach where one half of the facility is rotated and then the second half rotates. In such cases it is important to not schedule both of these rotations at exactly the same time. Rotations do create a potential for lapse in

surveillance and if more than one lifeguard is rotating at the same time this potential is increased and worse, it could be occurring in the same area. No more than one lifeguard station should be rotating at exactly the same time.

## LIFEGUARD STATIONS

Locations determine how well lifeguards can see their zone and how quickly they can react to an emergency. Lifeguards require the ability to reach all points in an assigned zone within 30 seconds. Lifeguards should be positioned so they have a full view of their assigned zone above and below the surface. It should be impossible for anyone to enter the pool area without being observed by a lifeguard. Lifeguards may be positioned in either elevated chairs, in fixed stations or as roving lifeguards on the ground. Each position has different advantages.

### Ground Level Stations

In some cases fixed stations are in the water such as in shallow water areas with play structures, zero-depth entries to wave pools and catch pools for slides. Fixed ground level stations are common around lazy rivers or at entrances to slides and other **attractions**. A fixed station allows lifeguards to be very close to patrons so they can easily make assists and enforce safety rules.

### Roving Stations

Lifeguards assigned to roving stations are lifeguards who patrol their zone by walking around the perimeter of the pool. From this position it is easier to interact with the public and to enforce rules courteously. Many times roving lifeguards are assigned to shallow areas, where a larger population of the pool is located and since most are non-swimmers, it is easier to provide them assistance. However, at deck level, swimmers and patrons may obscure one another from the lifeguard's view. It is also more difficult to see potential victims who may be changing position from horizontal to vertical (indicating a need for assistance or rescue). Typically roving lifeguards are supplemental to lifeguards in elevated chairs and should not be used as the only lifeguard on surveillance unless the total area is extremely small and can be seen in all dimensions, top to bottom.

### Elevated Stations

Elevated chairs (typically 5 to 6 feet high) give lifeguards a better vantage point than a station on the ground. Place elevated chairs so they are poolside no more than 1 foot from the edge of the pool to minimize the blind spot underneath the chair. Placement should also conform to the zone coverage plan. A chair that is at least five feet high allows the lifeguard to better see the vertical position of a potential drowning victim and it prevents obstruction of

their view should a patron stand or walk in front of the chair. Lifeguards must be taught in in-service training to assess the position of the elevated stations before opening the facility and also before assuming the station. If a station needs to be moved after the facility has opened, have the lifeguard take a roving position while the station is being moved. Elevated stations do have a blind spot directly beneath the chair and lifeguards must be trained to account for this blind spot by incorporating it into their scan. They may need to position themselves more forward in the chair to consistently look in this area. Lifeguards in other stations across from each other can also assist by checking the blind spot of the lifeguard across from them. Elevated stations are more difficult when interacting with patrons and enforcing rules. It may be difficult to get people to hear you and when the lifeguard projects their voice to compensate it can be misinterpreted. Lifeguards in elevated stations may need more support from supervisors when enforcing rules.

Short stands or lifeguard chairs less than 5 feet high can be used to supplement lifeguards in more elevated chairs. As with the roving lifeguard, lifeguards positioned in a short chair should not be used as the only lifeguard on surveillance unless the total area is extremely small and can be seen in all dimensions, top to bottom.

## **EMERGENCY EQUIPMENT**

Lifeguards need equipment to perform their duties as they were trained. These were discussed in the Rescue Ready section on page 15. Further explanation is added here as to the importance of AEDs and supplemental oxygen.

### **AEDs (automated external defibrillator)**

All national lifeguard training providers include AED skills within the lifeguard training course. Lifeguards are trained in its critical importance to the “**Cardiac Chain of Survival**”. The AED has become an important tool in increasing survivability of cardiac events and it is an expectation at many places of public accommodation. In 2005 it became California law that all health studios are required to provide an AED as well as someone trained in its use.<sup>22</sup> If you offer your facilities on a membership basis, this law could apply to you. If you provide lifeguard training courses or refresher courses for recertification, you are already required to provide AED training devices in order to certify lifeguards. The lack of an AED would certainly be questioned in a facility that has responders trained in its use as a matter of course. Therefore, at least one AED is strongly encouraged at each aquatic facility.

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<sup>22</sup> CA Health & Safety Code, section 104113

There are numerous requirements to providing an AED and a number of other policy decisions that need to be made, such as whether the program will be a public access program where the AED is available for use by any member of the public (similar to fire extinguishers) or whether they will be available to trained responders only. Consult with your organization's advanced life support unit or city fire department for more information on the requirements for provision of an AED.

### **Oxygen Equipment**

Except for the YMCA lifeguard training program, there is no external requirement for oxygen equipment or oxygen administration skills for lifeguards. However, drowning is an injury which benefits greatly from the administration of oxygen and is highly recommended. If oxygen equipment is available, then oxygen administration training should be made available to lifeguards and added to pre-service and in-service training.

## **COMMUNICATION SYSTEMS**

Communication is very important to the success of the lifeguard team. Not only do they need to communicate well with patrons but they must be able to do so with other members of the lifeguard team, aquatic safety team, as well as advance life support and other emergency personnel. The following are typical communications systems used by lifeguards. One or more of these systems must be selected and all lifeguards must be trained in their use.

- Whistle signals
- Hand signals
- Rescue equipment signals
- Flags
- Radios
- Telephones
- Megaphones
- CB radios
- Handheld public address devices with sirens
- Air horns

## **OPENING & CLOSING PROCEDURES**

Lifeguards must ensure that a complete check of the bottom of the pool at both opening and closing is completed. They should walk the entire perimeter of the pool, looking at the bottom very carefully to double check and verify that no one has been left in the pool. This is important even at opening to ensure that no one has fallen in prior to opening from trespassing or other unknown reason.

At closing, a lifeguard should remain on the deck until all entrances to the facility have been locked and no one can get back onto the pool deck or into the pool. This is especially important while persons are still using the locker rooms and/or restrooms. Until these areas can be secured from the pool area, a lifeguard should remain on deck.

## **POOL COVERS**

Lifeguards and coaches are two groups that are typically responsible for the removal and installation of pool covers at many aquatic facilities. It is important that both groups be informed of the dangers of pool covers when they are only partially removed. Lifeguards and coaches must NEVER allow any water contact activities to occur in a pool that is partially covered. The entire pool cover must be removed prior to any swimmers using the pool. Because of the labor involved in removing a cover, it can be very tempting to only remove a portion of it if only a small area of the pool is needed. This is extremely dangerous as the covered portion is not visible to supervision and a person can become disoriented and trapped beneath the cover without being observed. After removing the cover, lifeguards and coaches should walk the perimeter and scan the pool for anyone who may have become trapped under the cover. Additionally, before installing a cover, lifeguards and coaches should be sure that no one is still in the pool by walking completely around the perimeter and scanning.

## SECTION 3 – PREVENTION

### FACILITY HAZARD IDENTIFICATION AND ANALYSIS

Establish daily, on-going safety inspections using a facility check list. A sample checklist is provided in the Appendix. General areas and equipment to inspect include:

- Rescue and safety equipment
- Telephones used to summon emergency personnel
- Pool Deck, obstructions and surface condition
- Facility and deck equipment: lifeguard stands, starting blocks, pool ladders, drain covers, pool cover carts, lane line reels, lighting, signs
- Underwater lights
- Fences and gates
- Diving boards
- Emergency alarms
- Restrooms and shower areas
- Presence of shepherd's crook and ring buoy and line<sup>23</sup>
- Presence of required signs
- Safety rope
- Water quality testing
- Water clarity assessment

All inspections should be documented on the checklist and are typically kept in a facility log book. Ensure sufficient communications for when a hazard has been identified and any mitigation or repairs that are needed. Any hazards that can't be immediately mitigated should be controlled by closing off the area, preventing use, posting signs alerting the danger or otherwise restricting access. Ensure a system of follow-up when repairs require the support of other departments or contractors to ensure that work is completed. Ensure that a final check is made before equipment or areas are re-opened or returned to service.

### INJURY CHARTS

An **injury chart** can help to identify hazards that could go unnoticed by illustrating what injuries occur and where over time. The chart is a diagram of the supervised area, such as the pool and pool deck, complete with all pieces of equipment, lifeguard stations, safety rope, depth markings, fences and ancillary areas such as locker rooms, restrooms, snack bar, grass areas and other recreational areas. Each time an accident occurs, the location is

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<sup>23</sup> Required by CA Code of Regulations (CCR), 22 CCR § 65539

noted on the chart by a two to three digit code. A number as the first one or two digits can be assigned to a type of injury and a different code such as a letter or symbol could be assigned to a specific area of the body as the last digit. Below is an example of a code system used for an injury chart:

1. Abrasions	A. Arm
2. Cut	B. Hand
3. Bruise	C. Leg
4. Sprain/strain	D. Foot
5. Dislocation	E. Trunk
6. Fracture	F. Head
7. Burn	G. Spine
8. Drowning	H. Whole person
9. Spinal Injury	
10. Pain	

Thus, the code for drowning would be 8H. The code for abrasions and bruises of the leg would be 1,3C. These codes would be placed on the facility diagram where the injury occurred. The chart can be kept for a specified length of time such as a season or a year. The aquatic supervisor and lifeguard staff should analyze the chart to learn about the common accidents and injuries at the facility and where they are likely to occur. This can lead to a discussion of potential prevention strategies such as the establishment of new rules, making repairs, installing additional safety equipment, repositioning lifeguards, adding lifeguards or other staff or limiting access to an area. A sample injury chart is provided in the Appendix.

## FACILITY SAFETY AUDITS

On-site evaluation or audits can also apply to facility operations. As in individual lifeguard audits discussed on page 17, they can be conducted internally or via an external entity. These are not meant to be all inclusive evaluations but to focus on major deficiencies, safety hazards and code compliance. External evaluations are highly encouraged.

***Rationale:*** *Independent evaluations provide an unbiased objective view of both lifeguards and facilities. Additionally they identify needs for improvement and hold aquatic staff accountable for code compliance and changes.*

## ESTABLISHING, COMMUNICATING & ENFORCING RULES

Prevention of aquatic accidents by establishing rules requires familiarity

with:

- CA laws pertaining to the maintenance and operation of swimming pools. Most of these can be found in booklet compiled by the California Department of Public Health and available through your local health department as well as available on the CDPH website.<sup>24</sup>
- Your swimming facility.
- Hazards at your swimming facility, including previous incident and accident history.

Your chosen lifeguard training program will have a suggested list of common rules as a good starting point. To add a rule based on your evaluation to those already established, be sure to present your rule, the rationale behind it and your proposed enforcement strategy to your administration. You must gain approval and support for your rules or enforcement may never be fully possible.

Aquatic facility rules can be numerous under good intentions. So it is important to identify rules that are safety based vs. those that may be merely conditions or terms for facility use. For example, No running, pushing or rough play is a safety rule, whereas no smoking would be a use rule. Consideration should be given to emphasizing the safety rules by not mixing them with use rules. Use rules can still be communicated but often don't need the same emphasis as safety rules in your chosen communication strategy.

Communication is the first step in enforcing rules. Posting rules remains one of the best and most reasonable ways to inform patrons. Putting all rules on a single rule sign particularly if there are more than ten may not be the best strategy. Dividing up the rules and posting them in the locations where the rule is mostly likely needed is best. For example, posting diving board safety rules or slide rules near the location of diving boards or slides is better than combining them with other rules at the entrance to the facility.

Posting on fences, pool entrances, lifeguard stands, diving board mounts are all acceptable spots to mount signs. Rules can also be handed out with pool passes, newsletters, and displayed on websites. In some cases rules required by law are also required to be posted and may require a certain size font, typically 4 inches. See Section 5, page 41 on required signs.

### **Rules Requiring Special Consideration**

Below is not meant to be a list of common pool rules as these are readily available in lifeguard training program materials. The list below includes a

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<sup>24</sup> [CDPH web site with swimming pool regulations](#)

discussion of rules that are often overlooked or are not well understood.

- **Age & Height Rules** - Rules pertaining to the age or height of a child in order to use the facility alone without adult supervision are important safety rules. Such a rule should be tied to the amount of supervision you can provide through lifeguards or others. Reasoning behind such a rule is that younger children are typically poor or non-swimmers and can really tax the surveillance capabilities of lifeguard staff if there are a lot of them. Such children are usually not old enough to appreciate common dangers and may not be able to read or comprehend safety rules. Similarly, most aquatic facilities do not provide locker room supervision. Parents should clearly understand this as locker rooms are open to the public. Since age is not something that is easily observable, consideration for a height rule that can be objectively measured should be given. The actual height can be tied to the ability to stand up in the shallow end with the shoulders above water level.
- **Caregiver Supervision Rules** - Often combined with the above is a rule requiring a ratio of supervision for younger children. Statements such as one on one or "**touch supervision**" and supervision in the water (vs. from the deck) are good safety rules as the burden on lifeguards is not relieved when only one or two adults bring in several children and then leave them to pursue their own recreational activity. It is especially important to enforce this rule for everyone, including group use. Aquatic staff often ignores this rule with groups and allows one or two supervisors to bring in several children below the height or age limit and they do not always require supervisors to accompany the children in the water. This should not be done without assigning additional supervision equal to the rule's ratio requirement. Otherwise you run the risk of inconsistent rule enforcement with insufficient supervision and an increased risk of drowning.
- **Personal Flotation Device (PFD)** rules – Traditionally, many facilities have rules prohibiting the use of PFDs as a prevention of over-reliance by caregivers who leave children alone in the device and do not provide "touch supervision". Today, there are many facilities that require the use of PFDs for children below the age or height limit in addition to adult supervision requirements. Additionally, PFDs are now required by state law to be provided at no charge for non-swimmers or upon request at wave pools. Both rules work if properly enforced and adult caregivers are required to provide touch supervision. Typically, requiring PFDs is done for leisure facilities with many attractions that distract both young children and their parents who can become separated. A common

objection to the rule by some parents is that their young child is an elite or competitive swimmer and does not need a PFD. Despite this objection, consideration for requiring PFDs for children below the age or height limit is recommended as an extra layer of protection in case parent and child become separated. An added bonus is that these children are now much more easily identifiable and if they appear to be alone, supervision rules can be more easily enforced.

Anytime PFDs are allowed or required, lifeguards must ensure that they are U.S. Coast Guard approved devices or that there is a doctor's prescription for the device (to accommodate under the ADA). Many commonly available flotation devices are dangerous and can actually hold the head of a child underwater, such as doughnut-type toys, and swimsuits with innertubes sewn in. Arm floaties can easily and unexpectedly deflate. To prevent parents and adult caregivers from bringing these unsafe devices and having them rejected, it is advisable to provide U.S. Coast Guard approved PFDs free of charge when the facility requires them. If you provide USCG approved PFDs, you must ensure they are a proper fit so the patron receives the safety benefit. Therefore, you should also have a variety of sizes available.

- **Attraction Rules** - Specialized attractions require specific rules. Leisure facilities with attractions such as wave pools, lazy rivers and lily pads commonly have specific safety rules for these attractions. Most manufacturers provide information on suggested rules for use which should be followed. However, lifeguards and supervisors at traditional pools that add attractions such as slides, inflatables or climbing walls should also be aware of the need to add rules for use of these attractions.
- **Diving Board Safety Rules** – Diving Board areas should be roped off and separated from swimming areas to prevent swimmers from unwittingly entering the diving area. A separate dedicated lifeguard(s) should be positioned where the entire volume (top to bottom) of the diving area is observable. Lifeguards should observe each diver enter the water, surface and exit the water before another diver is permitted to dive. A dedicated lifeguard for this area means they have no other zone of responsibility. Other good rules for recreational use are requiring swim tests prior to use of the diving board, one person on the board at a time, requiring entries to be straight out the front of the board and not to the side, restricting double and repetitive bouncing, use of the fulcrum and preventing divers from swimming back underneath the board.
- **Prolonged Breath Holding and Prolonged Underwater Swimming** –

There is considerable danger of sudden loss of consciousness when engaged in these activities. Therefore there should be rules posted against it and lifeguards should be trained to recognize it and enforce those rules. Lifeguards should not allow breath holding contests, **hyperventilation** techniques, or attempts to swim long distances under the water, such as the length of the pool. Competitive swim coaches must not use hyperventilation techniques with their swimmers as a matter of policy and lifeguards should have the authority to stop such activities. This does not include **hypoxic training**, a common competitive training technique that involves breathing every five, seven or nine strokes. However, **USA Swimming** recommends that hypoxic training be conducted only under close supervision.<sup>25</sup> The American Red Cross also recommends instruction and close supervision and that hypoxic training is only to be used by experienced swimmers in good physical condition.<sup>26</sup>

In order for lifeguards to be successful in enforcing safety rules, they must be well-versed in the rationale for each rule and, how they protect from injury. In-service training must include specific information behind each rule and lifeguards should be able to articulate why the rule is important. Additionally, enforcing rules can be challenging, particularly with adults as most people do not like to be corrected. Guidance on what to say and what not to say can assist with challenging enforcement situations. Also, being able to suggest alternative behaviors if possible is helpful. For example if there is a safe place to run in the facility, such as another recreational area, patrons can be directed to that area.

Consistency is the most important part of rule enforcement. Everyone on the lifeguard team must understand the difficulty for team members when everyone does not enforce all the rules all of the time or enforces them differently. Procedures should be developed for consequences for breaking the rules that are consistently applied and administration must be able to support those procedures. This could include loss of privileges, and leaving the facility. Lifeguards should know who has the authority to apply these consequences so that they do not overstep their authority. If lifeguards ever begin to feel that the rules they enforce or the consequences they apply according to procedures are routinely overruled by management, you will have lost enforcement and will raise significant safety issues due to the lack of safety rule enforcement.

Lastly, rule enforcement needs to be done without loss of surveillance; therefore instructions will necessarily need to be kept short. Anyone who

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<sup>25</sup> USA Swimming Safety Loss Control Manual Nov. 2005

<sup>26</sup> American Red Cross Safety Training for Swim Coaches 1996

needs further explanation should be directed to management. Additionally, lifeguards should have a way of communicating to supervisors when they need additional assistance with a patron who needs more attention than they are able to give while they are engaged in surveillance.

## **SPECIAL LIFEGUARD SITUATIONS**

Some activities may present unique situations that require additional safety procedures or precautions.

### **Instructional Programs**

Instructional classes have the benefit of an instructor for each class. However, they still require a separate lifeguard as instructors are focused on teaching and not lifeguarding. Lifeguards must still scan every person in the water, enforce rules, perform rescues and provide first aid if needed. Instructors are part of the Aquatic Safety Team and should receive training on how to assist lifeguards in an emergency. Some instructors may have lifeguard training and some may not. Those that lack lifeguard training may need more information, knowledge or training in order to execute their part in the emergency action plan. Instructors should participate in emergency action plan drills.

### **Competitive Aquatics & Events**

All coaches who work with competitive aquatic athletes should have certification in:

- First Aid
- CPR (adult and/or child depending on the age group of the athletes)
- ARC Safety Training for Swim Coaches or a Lifeguard certificate as discussed on page 1.
- If working with minors they should also clear a criminal background check as discussed on page 8.

Lifeguards should allow diving instruction only in water that is at least nine feet deep. Once competitive swimmers are proficient, they may dive in water that is at least five feet deep at the starting end of the pool. If the depth of water is less than five feet deep and the start cannot be re-located to deeper water then have the swimmers start in the water, executing a push start off the wall.

***Rationale:** As of 2010, all major instructional agencies (YMCA, the American Red Cross, USA Swimming, and USA Diving) require basic diving instruction to occur in a minimum of nine feet of water.*

Starting blocks should be placed in water that is a minimum of five feet

deep. Starting blocks should only be used under the direction of trained coaching or instructional staff. When not in use, starting blocks should be covered or their use restricted to prevent unauthorized and untrained access.

***Rationale:** Catastrophic head, neck and spinal injuries have been known to occur when starting blocks are used in shallow water. Recreational swimmers often try to emulate activities that they have seen others do and can become seriously injured.*

Have a separate lifeguard on duty for all competitive practices and competitions. Do not allow a coach or instructor to teach or coach and lifeguard at the same time. As discussed on page 3, this is extremely risky. A common objection for competitive groups who rent or have other agreements to use the pool is the cost of lifeguard service. Typically, they argue that their coach is qualified and a lifeguard is not necessary. Such objections can be overcome with the safety information provided in this document. Additionally, coaches may be unfamiliar with your safety equipment, its location and your emergency action plan. However, it is highly recommended to include the cost of the lifeguard service within your rental fees. The lifeguard cost is part of the fee and the pool cannot be rented without the lifeguard as part of the service. The pool and the lifeguard cannot be separated and you cannot have one without the other as a matter of policy. This approach can reduce the amount of times objections to lifeguard costs occur. Coaches are part of the Aquatic Safety Team and should receive training on how to assist lifeguards in an emergency. Coaches who are regular users of the facility should participate in emergency action plan drills.

### **Specialty Classes & Activities**

Classes such as scuba and kayak instruction require specific training for lifeguards and may require special rescues. Lifeguards should be trained on what to look for and how to tell when someone needs assistance. For scuba classes, if the instructor is in the water and will rely on the lifeguard to provide assistance during an emergency, then a class specific emergency action plan must be developed and lifeguards along with the instructor must train and practice the plan and any special rescue techniques. Kayak classes often train and instruct on a skill known as the **Eskimo roll** as this is easier to teach in the controlled environment of a swimming pool. Lifeguards should be trained in what to look for in this skill, how they can assist the instructor during an emergency and a signal should be devised that both participants and the instructor can give should they need the lifeguard's assistance.

## Spas & Whirlpools

Ensure that all spas and whirlpools are located where they can be observed by lifeguard staff. All spas and whirlpools must have signs with safety language as specified in CA Health & Safety Code.<sup>27</sup>

Consider a time limit rule of 10 minutes and an age limit rule based on the supervision you are able to provide. Unsupervised use by children under 14 is prohibited per the CA Health & Safety Code.

Equip spas and whirlpools with timer switches that limit jet action to a set maximum time (recommendation for a 10 minute maximum). Position these switches where users must exit the water to reactivate the jet action. Ensure that spa and whirlpool temperatures do not exceed 102° F.<sup>28</sup>

***Rationale:** Spas and whirlpools can increase the risk of heat related emergencies especially for the very young and those with medical conditions.*

## Rental Groups

Groups that rent the facility, particularly for day camps or parties need special attention. All rental groups should have a **facility use agreement** (contract) which specifies the terms for the rental. Include what supervision you will provide and what supervision you require from the group. It is highly recommended that the group provides some supervisors in the water. Be sure your supervision plan meets your facility rules for the general public if the group will be sharing the pool with the general public. If the rental is exclusive use, your supervision plan can vary as long as you can provide any extra supervision to maintain safety.

Ensure that the group identifies a leader or other contact that will be present during the rental and will act as the person in charge of the group. Require that the group leader meet prior to the rental with the aquatic supervisor, pool manager or head lifeguard to review the facility rules and the supervision plan. Make sure expectations regarding what their supervisors will do and be responsible for are clear. Give a copy of the rules to the leader and require the leader to review those rules with attendees and supervisors. Clarify consequences for failure to follow the rules including asking the group to leave. Include a copy of the rules as an attachment to the agreement. These strategies prepare the group ahead of time on what to expect. Rules will not be surprises and any rules, such as swimsuit attire or the need for PFDs can be prepared for in advance.

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<sup>27</sup> CA Code of Regulations (CCR), 24 CCR § 3119B.5

<sup>28</sup> CA Health & Safety Code sets the maximum temperature for a spa at 104°

Additionally on the day of the rental, a designated lifeguard or head lifeguard should give the group an orientation to the facility, including the location of restrooms, locker rooms and where the deep and shallow ends are. The lifeguard should review the pool rules and safety principles with the group.

All children should be swim tested. Children who pass or do not pass the test should be readily identifiable to lifeguards. Typically this is done by supplying children with wristbands. The wristbands can be color coded or they can be given to only swimmers. Only those who have passed the test and have a wristband should be allowed in deep water. Non-swimmers and those that did not pass the swim test should have the shallow areas pointed out to them and they should be reminded that this is the area where they must stay.

### **Recurring Group Use**

Groups who use the facility on an on-going basis for a term greater than a single event or day should also have a facility use agreement and should follow the safeguards described above. In addition, lifeguards should review the rules each time the group uses the facility as children benefit greatly from repetition and can easily forget.

Consider instituting a buddy system. Pair children of similar ability who agree to stay together at all times. At a pre-arranged signal such as a whistle blast, buddies should clasp and raise their hands to show they are together. Lifeguards can also count pairs to ensure that no one is missing.

Depending on the length of time the group is using the pool, consider clearing the water half way or at some other pre-determined length of time. This can give both lifeguards and swimmers a chance to rest.

### **Special Events**

Special events or activities that rarely occur and that lifeguards may not have much experience with should have a special lifeguard meeting prior to the event. Such events include things like dive-in movies, film shoots, and events that encourage large groups such as the recent "World's Largest Swimming Lesson" campaign. Lifeguards will need to be informed of the plan for activities and supervision. Explain any changes and adaptations to the Emergency Action Plan and System Coverage (zones). Document these plans as well as the meeting agenda and attendees in writing. Post diagrams illustrating the zones for the event in your lifeguard employee only area. The number of lifeguards should be increased from any of your standard system coverage plans. Practice the special Emergency Action Plan with lifeguards to ensure the adaptations or changes work.

Review special equipment requirements not typically used in the facility such as innertubes for a dive-in movie. For these events, a good rule is to require all persons in the water, watching the movie to be in an innertube. This way, if lifeguards observe an empty innertube in the water, it is cause for further concern and to check for a possible missing swimmer. It is highly encouraged to use innertubes of the clear type as well as reducing the maximum number of swimmers that is typically permitted, so that visual obstruction is minimized.

### **Staff Parties**

Staff should know when it is acceptable to use the facility after hours and for what activities. Permission from administration must be obtained and the aquatic supervisor should always be present. Safety rules for the general public should be followed. All aquatic, in water activities even for all lifeguard events should have at least one separate lifeguard conducting surveillance and potentially more than one depending on the number of participants. Use the same care in devising a system coverage plan as you would for any other activity. Staff members who have been entrusted with keys to the facility due to a leadership position should always clearly understand the responsibility.

## SECTION 4 – EMERGENCY RESPONSE

### EMERGENCY AND ACCIDENT MANAGEMENT PROCEDURES

Develop and implement a standardized response protocol for various emergencies. Possible types of emergencies are listed in the suggested table contents for the policies and procedures training manual on page 10. Ensure that the emergency action plan supports this protocol. Other public safety responders such as city fire and police departments are good resources to use in the development of response plans, particularly for non-aquatic emergencies.

### EMERGENCY ACTION PLANS

For aquatic emergencies, sample emergency action plans can be found in your chosen training provider's instructional materials. Identify the primary needs during an emergency and how they will be addressed. Below are some guidelines to use in developing an emergency action plan for aquatic emergencies.

The primary components of an effective rescue and emergency action plan are:

- Lifeguard recognizes an emergency and uses a communication protocol to notify the rest of the staff, then moves to aid the victim and provides basic life support.
- The safety of other swimmers must be maintained, therefore the balance of lifeguard staff continue to watch the pool or move to cover the rescuing lifeguard's zone as well as their own. The pool must be cleared if lifeguard supervision is not possible or if lifeguards will be needed to support and assist the rescuing lifeguard.
- Other members of the lifeguard team or aquatic safety team respond in a pre-determined manner:
  - To assist the rescuer if necessary with first aid or basic life support
  - To control the crowd
  - To call for advanced life support (EMTs, paramedics) if indicated
  - To direct advanced life support personnel to the correct entrance to the facility
  - To unlock any gates or doors to provide access for advanced life support personnel

- Lifeguards assist advanced life support personnel as requested
- Lifeguard(s) prepare rescue and accident reports as soon as practically feasible
- Lifeguards check equipment and follow protocols for re-opening the facility if closed.

The facility should not re-open if all equipment is not in place or lifeguards are not ready to resume their surveillance for any reason.

If the victim was treated for serious injuries or illness, have a plan for:

- Closing the facility
- Contacting family members
- Contacting the organizational chain of command
- Handling patrons, answering questions or potential media inquiries
- Discussing the incident details
- **Operational debriefings**

### **Critical Incident Stress Debriefing (CISD)**

Within 24 to 72 hours from a catastrophic incident, employees directly involved in the incident should be offered and receive the opportunity to attend a critical incident stress debriefing with a mental health professional. A plan to be able to provide this debriefing needs to be made in advance of any actual incident to ensure that resources are available to conduct the meeting and a protocol has been devised to request it. Catastrophic events are especially stressful if the employee believes that he or she did something wrong even after doing exactly what he or she was trained to do. The CISD meeting is designed to help employees recognize, understand and cope with the stress. All employees including those who were not directly involved should be monitored by supervisors for signs of critical incident stress. Such stress may manifest itself as sleeplessness, anxiety, depression, exhaustion, restlessness, nausea or nightmares. Some effects may occur immediately or may appear days, weeks or even months following the incident. A CISD should be offered to any employee who exhibits signs of critical incident stress or to any employee who requests one following a catastrophic incident.

## SECTION 5 – COMPLIANCE WITH LEGAL REQUIREMENTS

The aquatic facility and its lifeguard operation are governed by a number of regulations and legal requirements. This document is not intended to provide information on every applicable standard. The intent is to provide an introduction to the standards that will assist lifeguards and their supervisors in providing the safest aquatic facilities possible.

### CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

The laws and regulations governing swimming pools and lifeguard operations are not conveniently located in a single document. Fortunately, the CDPH has compiled a booklet which contains excerpts from Title 22 and Title 24 and other sources that apply to swimming pools and is available from most local health departments. Additionally, this information is available on the CDPH website, [www.cdph.ca.gov](http://www.cdph.ca.gov).<sup>29</sup> The website is also a gathering place for most other regulations applying to swimming pools and is a good resource.

Many of these requirements have been previously mentioned and referenced. The following deserve special mention along with the implications for lifeguards and supervisors.

### VIRGINIA GRAEME BAKER POOL & SPA SAFETY ACT (VGB)

Enacted in 2008-The VGB Act takes its name from the 7 yr. old daughter of Nancy and James Baker IV, the son of former Secretary of State James Baker III-she drowned in June 2002 after she was trapped under water by the powerful suction from a hot tub drain. California has developed and incorporated this Federal law into state law. The law and its requirements are designed to protect the public against suction entrapment. For lifeguards, they should receive training on the dangers of suction entrapment and factors that could lead to it.

- Lifeguards must close facilities that do not have drain covers or have broken drain covers, no exception.
- Lifeguard must not allow patrons to play on or near drains even with covers in place. Additionally, they should not allow anyone to tamper with or attempt to tamper with the drain cover or any of its parts.
- All lifeguards should be shown and have access to emergency shut off

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<http://www.cdph.ca.gov/HealthInfo/environhealth/water/Pages/CaliforniaPublicSwimmingPoolRequirements.aspx>

switches for pumps. Should an entrapment occur, this is the quickest way and most times the only way to release the powerful suction.

Management should ensure that all drain covers comply with the law and if required, a secondary release system has also been installed.

## **BLOODBORNE PATHOGENS STANDARD (BBP)**

The BBP standard is a state and federal regulation designed to prevent disease transmission to workers who are occupationally exposed to blood and other potentially infectious materials and is enforced by **Cal-OSHA** within California.

The standard requires training for lifeguards with a prescribed content. It also requires that lifeguards use and or wear personal protective equipment (PPE) provided by the employer. Typical duties for lifeguards that require the use of PPE are the application of first aid and providing basic life support to include rescue breathing and CPR. PPE needed for most lifeguards to perform these duties and thereby protecting them against disease transmission are nitrile or vinyl (non-latex) gloves and resuscitation masks with one way valves. Gloves and masks must be easily accessible and immediately available to lifeguards in an emergency. The easiest method adopted by many well-managed aquatic operations is to supply this equipment in a hip pack that is carried by each lifeguard.

### **Risks of Lifeguard Body Art and Body Piercings**

Tattoos and piercings continue to be popular with the age group that often makes up the recruiting class for lifeguards. It is important to note that while tattoos and piercings which are old have a limited risk for the transmission of disease, this is not true for new tattoos and piercings. Since transmission can take place through non-intact skin, a lifeguard who displays a new tattoo or piercing should not work as a lifeguard until a doctor can verify that transmission through the skin cannot occur. This is important to protect both the lifeguard and the members of the public that could come in contact with the lifeguard. Additionally, certain piercings in the mouth can restrict the ability to perform rescue breathing and CPR and should be removed before reporting for duty.

## **PREVENTING RECREATIONAL WATER ILLNESSES (RWIS)**

The prevention of RWIs is a direct reflection of the care and quality of maintenance for the aquatic facility as well as knowledge and adherence to state codes. Water quality standards are set in code and are available on

the CDPH web site. Pool operators should be well versed in the standards and minimum requirements to maintain healthy swimming pool water. Pool operator training is a good first step in providing the needed knowledge and education in this area. Pool operator training is not just for those persons directly providing the maintenance. Healthy swimming pool water is a team effort and aquatic supervisors and pool managers can benefit from this training as well. When the on-site staff and maintenance staff can speak knowledgably with each other, they can work together keeping water quality at its best. Nationally available pool operator training is provided primarily through the National Swimming Pool Foundation's **Certified Pool Operator (CPO)** course and the National Recreation and Park Association's **Aquatic Facility Operator (AFO)** course. Both are highly recommended for lifeguard supervisors and maintenance staff.

Lifeguards should be versed in the minimum and maximums for the pool disinfectant (typically chlorine) as well as the acceptable range for pH. Lifeguard supervisors must have clear authority to close the facility when these levels fall below state standards.

The state code requires:<sup>30</sup>

- A minimum of 1.0ppm of chlorine or
- 1.5ppm of chlorine when cyanuric acid or isocyanurates are used
- pH must be maintained in an alkaline condition between 7.2 and 8.0

Local health departments may have additional requirements and you should follow these as well. Typically they recommend a maximum of 10.0ppm of chlorine. Additionally, many factors can affect these ranges and a pool operator certificate can help staff to solve such problems as quickly as possible minimizing the need for closing.

Some local health departments may require their own pool operator's license and/or training program. Consult with your local health department to see if these apply.

Lifeguards must also be able to see the bottom of the pool at all times. If the water becomes cloudy for any reason, and lifeguards cannot see the bottom, then lifeguards must have the authority to close the pool until the water is once again clear.

## REQUIRED SIGNS

California law requires a number of signs for aquatic facilities and a list of all required signs is not conveniently available from a single source. Signs are

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<sup>30</sup> CA Code of Regulations (CCR), 22 CCR § 65529

required based on the individual circumstances and unique features of each facility. Below is a list of common signs required for aquatic facilities and the code citation for each. The code should be referenced as the language required for the sign as well as the size of the font is often specified.

- Warning sign for no lifeguard service 22 CCR § 65539(c)
- Diagrammatic illustrated artificial respiration (CPR) 22 CCR § 65539(d)
- Telephone number for emergency medical services (911) 22 CCR § 65539(d)
- Emergency exit 24 CCR § 3118B.2
- Occupant load 24 CCR § 3119B.1
- Occupant load for spas 24 CCR § 3119B.1.2
- No diving (for shallow pools) 24 CCR § 3119B.2
- Gas chlorine warning 24 CCR § 3118B.3
- Warning for pool without lighting 24 CCR § 3118B.4
- Warning/precautions for spas 24 CCR § 3118B.5
- Labeled emergency shut off for spas 24 CCR § 680-12

## JUNIOR LIFEGUARD PROGRAMS

It is very important that Junior Lifeguard Program participants do not become similar to employees in order to avoid conflict with U.S. Department of Labor (USDOL) restrictions on minors employed as lifeguards. Such cases have occurred in California where program leaders in their enthusiasm to give program participants a realistic experience in the lifeguarding profession have directed them to assist lifeguards, swim instructors or other aquatic workers by performing certain lifeguard or other aquatic functions. The results were fines and/or sanctions by the California Department of Industrial Relations even though the participants were not employees receiving wages.

To understand how this occurs, you must consider the duties that the USDOL considers lifeguard duties:

- rescuing swimmers
- monitoring of activities at a swimming pool to prevent accidents
- teaching of water safety
- providing assistance to patrons
- maintain order and cleanliness in the pool and pool areas
- give swimming instructions
- conduct or officiate at swimming meets
- administer first aid
- checking in and out such items as towels, rings, watches and apparel

In 2010, the USDOL added this clarification:

“. . . a core and defining duty of a lifeguard is the rescuing of swimmers in danger of drowning, often by entering the water and physically bringing the swimmer to safety. Under 29 C.F.R. § 570.34(l), any employee under the age of 16 whose duties include this core duty-such as a "junior lifeguard" or a "swim-teacher aide"-or whose employment could place him or her in a situation where the employer would reasonably expect him or her to perform such rescue duties, would be performing the duties of a lifeguard while working in such a position. For such employment to comply with these child labor provisions, the employee would have to be at least 15 years of age and possess the proper certification."

It is strongly encouraged that Junior Lifeguard programs use all of the following strategies to ensure they are participant based programs and not an abuse of child labor:

- The participant pays a fee to participate in the program
- Active supervision is provided at all times during the program by a specified instructor and that participants are not left in the care of lifeguards or other aquatic staff
- The program has a defined schedule with a beginning and especially an end that is strictly adhered to and that no "practical" experience is added at the conclusion of or after the program
- Ensure that participants do not serve apprenticeships or shadow working lifeguards or any other similar activity

## SECTION 6 – RISK MANAGEMENT

### RECORD KEEPING

A successful aquatics operation will need to keep several types of records. But specifically records required as a best practice for lifeguard operations are:

- Employment records – applications, job descriptions, pre and post-employment testing, evaluations, audits, certifications
- Maintenance records – facility log, and any other maintenance records completed by lifeguards, such as maintenance requests and water test results.
- Equipment records – manufacturers' suggested maintenance and warranty information. Many times equipment is ordered by and delivered to a separate maintenance department which installs the equipment at the facility. The maintenance and warranty information that accompanies the delivery should be made available to aquatic staff. A plan for carrying out such maintenance should be devised, particularly if there is daily maintenance requiring lifeguard support.
- Safety – facility inspections, in-service training, staff meeting minutes.
- Accidents – injury reports, rescue reports, injury charts.

Record keeping is often the only way to substantiate that actions were taken or procedures were followed. All aquatic staff should be reminded that if it isn't written down, then it can always be concluded that it didn't happen. Records must be kept to substantiate all of the hard work and responsiveness by lifeguards and supervisors at the facility. Without these records, it can be concluded that staff did not follow policies, procedures, state law or were otherwise unresponsive.

### FACILITY USE AGREEMENTS

Facility use agreements are an important risk management tool to clarify responsibilities between aquatic staff and group users. Lack of communication, particularly regarding supervision can leave unsafe gaps. Such agreements should be drafted by the organization's legal counsel and approved by a risk manager or PARSAC. In addition to a supervision plan, terms regarding group size, responsibility for transportation, equipment needed or required can be added. Include agreements for **indemnification** for each of the parties as well as requirements for **certificates of insurance**. If the agreement is with an organization, it could also be beneficial in some cases to require individual **releases/waivers** for each participant. For these legal elements to a facility use agreement, please consult your organization's legal counsel or PARSAC.

## DEFINITIONS

**AED (automated external defibrillator)** – A portable electronic device that analyzes the heart's rhythm and can deliver an electrical shock. This is called defibrillation.

**Americans with Disabilities Act (ADA)** – A wide ranging civil rights law enacted by the U.S. Congress in 1990 and amended in January 2009. The ADA prohibits, under certain circumstances, discrimination based on disability and prescribes certain requirements for facilities.

**Aquatic Facility Operator (AFO)** – A product of the National Recreation & Park Association, the AFO course is a comprehensive aquatic operations certification course specifically designed to meet the needs of those working in public and semi-public aquatic recreation facilities. The course is designed to provide information and training for both supervisory and operations personnel.

**Aquatic safety team** – A network of people in the facility and the organization, to include, managers, administrators, colleagues, non-lifeguard aquatic staff and members of advanced life support teams as well as other emergency responders. All members of the aquatic safety team can plan for, respond to and assist in an emergency and should be considered in the emergency action plan.

**Aquatic supervisor** – an individual employed by an organization with aquatic supervisory responsibilities as a primary job function, sometimes also called a pool manager.

**Attraction** – An amenity or equipment within an aquatic facility designed to create excitement. Wave pools, slides, lazy rivers and lily pads typically found within leisure facilities are examples of attractions. Equipment added to traditional pools, such as slides, inflatables and climbing walls over water are also attractions.

**Audit** - Another word for on-site evaluation, the unannounced visual observation of lifeguards while conducting surveillance and subsequent physical testing of lifeguard skills.

**Bag-valve mask (BVM)** – A hand held device attached to a resuscitation mask that is used to ventilate a victim in respiratory arrest or when performing CPR.

**Bloodborne pathogen (BBP) plan** – Also called an exposure control plan, a

plan developed by the employer to eliminate or minimize employee exposure to bloodborne pathogens and other potentially infectious materials. The BBP plan is required by the California Occupational Safety & Health Administration (Cal-OSHA) regulations.

**California Department of Public Health (CDPH)** – The state agency charged with enforcing the state health and safety code within California.

**Cal-OSHA** – The California Occupational Safety & Health Administration inspects workplaces and enforces laws to protect the health and safety of workers in California.

**Cardiac chain of survival** – Is a concept of a chain consisting of four links; early recognition, early CPR, early defibrillation and early advanced medical care. For each minute that CPR and defibrillation is delayed, the victim's chance of survival is reduced by 10 percent.<sup>31</sup>

**Certificate of Insurance** - A document providing evidence that insurance has been purchased and ensures that the insured party has the financial resources to meet their legal obligation of indemnification within a contract.

**Certified Pool Operator (CPO)** – A product of the National Swimming Pool Foundation, the CPO course is an aquatic operations course designed to provide individuals with the basic knowledge, techniques, and skills of pool and spa operations.

**Critical Incident Stress Debriefing (CISD)** – A meeting(s) attended by one or more members of the lifeguard team, aquatic safety team or all of both teams to discuss with a mental health professional their thoughts, feelings and symptoms of stress following a catastrophic incident. The goal of the meeting(s) is to assist team members with recognizing, understanding and coping with the stress. Optimally, CISD occurs within 24 to 72 hours of an incident. CISD should not be confused with an Operational Debriefing which has a different purpose. See definition.

**Dual supervision** – The risky practice of a single individual functioning as both a lifeguard and a coach or instructor at the same time without the presence of a separate lifeguard.

**Emergency action plan (EAP)** – A plan developed to respond to an emergency which includes action steps to be performed by staff, communication protocols and cross departmental procedures.

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<sup>31</sup> Lifeguarding Manual, American Red Cross 2012

**Eskimo roll** - A kayaking skill in which a kayaker executes a complete rollover while seated and sometimes strapped into the kayak. The rollover is from an upright position to an upside-down position where the head and torso are underwater, to an upright position once again.

**Fecal incident & vomit procedures** – Procedures prescribed by the California Health & Safety code or local health department to prevent disease transmission and recreational water illnesses due to the introduction of feces or vomit to the water.

**Hyperventilation** – A dangerous technique used to stay under water longer by taking several deep breaths followed by forceful exhalations, then inhaling deeply before swimming under water.

**Hypoxic training** - Hypoxic training is “low oxygen” training and involves the reduction or elimination of breathing while training. In swimming, this typically involves breathing every five, seven or nine strokes, or limited underwater swimming. Hypoxic training should only take place with experienced swimmers in good physical condition and under close supervision.

**Incident report** - A report documenting any unusual incident, particularly if there was no injury or accident and the incident would otherwise go unreported.

**Indemnification** – Provision in a contract in which one party agrees to be financially responsible for specified types of damages, claims, or losses.

**Injury/accident report** - A report documenting any injury or accident, or a rescue where advanced life support was called.

**Injury chart** – A diagrammatic chart used to help identify hazards within a facility by illustrating what injuries occur and where over time.

**In-service training plan** – An annual or seasonal plan for lifeguard training that expands upon the basics skills learned in the certification course, applies those skills to the specifics of the work site and teaches lifeguards how to work as a team, particularly in emergency response.

**Lifeguard quick check** – Quick assessments and observation of lifeguards by non-aquatic staff and patrons to ensure that lifeguards are rescue ready. The term is attributed to the YMCA of the U.S.A. lifeguard training program.

**Lifeguard team** – All certified lifeguards (at least two) employed by an organization who work together as a team to provide a comprehensive public safety lifeguard service. This includes supervisors and managers who are also certified lifeguards.

**Material safety data sheets (MSDS)** – Forms that provide data on the properties of a particular substance or chemical. MSDS provide workers and emergency personnel with procedures for handling or working with a substance in a safe manner. Training on what hazardous materials are used or stored in the workplace as well as how to read and understand MSDS is required by the California Occupational Safety & Health Administration (Cal-OSHA) regulations.

**On-duty** – Lifeguards assigned to work and are receiving salary or wages from the employer or are executing a valid volunteer assignment. Lifeguards on duty may be on break or conducting primary or secondary duties and may not necessarily be on surveillance. For example, you could have a total of three lifeguards on duty and only two at any one time conducting surveillance.

**On-site evaluation** – Another word for audit, the unannounced visual observation of lifeguards while conducting surveillance and subsequent physical testing of lifeguard skills.

**Operational Debriefing** – A meeting attended by the entire lifeguard and aquatic safety team to talk about what happened before, during and after an emergency. The goal of the meeting is to examine what happened and assess the effectiveness of the emergency action plan. This meeting should not be confused with a Critical Incident Stress Debriefing which has a different purpose. See definition.

**Personal flotation device (PFD)** - Any device designed to keep a person afloat in the water. Many are nothing more than toys and can be dangerous when they easily deflate or hold the head of young children under water. The only PFDs to be considered safe in the aquatic environment are those approved by and displaying the U.S. Coast Guard seal. A Type II or Type III life vest is required by the California Wave Pool Safety Act.

**Personal protective equipment (PPE)** – Specialized clothing or equipment worn or used by an employee for protection against a biohazard. The employer must furnish PPE at no cost to the employee.

**Policies and procedures manual** – An aquatics operations manual containing standard operating procedures, standards and guidelines that define the expectations of the organization for the aquatics staff. The manual is not only a resource and reference manual, but a living document

used to provide a comprehensive and consistent orientation and pre-service training program for lifeguards.

**Pool manager** - an individual employed by an organization with aquatic supervisory responsibilities as a primary job function, sometimes also called an aquatic supervisor.

**Pool operator groups** – Independent professional organizations devoted to the networking and professional development needs of pool operators, lifeguards and administrators. Current groups in California include: Southern California Public Pool Operators Association (SCPPOA), Bay Area Public Pool Operators Association (BAPPOA), Northern California Aquatic Management Association (NCAMA), and San Diego County Aquatic Council (SDCAC).

**Primary duties** – Lifeguard duties directly related to preventing drowning and other injuries such as surveillance, minimizing or eliminating hazardous situations or behaviors, enforcing rules and regulations, recognizing and responding quickly to emergencies, administering first aid, CPR, use of an AED and oxygen equipment.

**Recertification** – The process by which a lifeguard renews his or her lifeguard certification, usually by taking a refresher course and successfully completing physical skills and written tests as required by their training provider.

**Release** - A legal instrument that acts to terminate any legal liability between the releasor and the releasee, and is signed by the releasor.

**Requalification** – The process by which a lifeguard maintains his or her eligibility for the lifeguard position by maintaining job required certifications and/or physical skills and written testing requirements. Supervisors should annually assess lifeguard eligibility based on their minimum stated requirements for the job.

**Rescue ready** – The state when a lifeguard at their assigned station is carrying a rescue tube, personal protective equipment, a communication device, is readily identifiable as a lifeguard and is properly positioned for swimmer surveillance, rescues and other emergency care. The term is attributed to the YMCA of the U.S.A lifeguard training program.

**Rescue report** – A report documenting a rescue made by a lifeguard that required leaving their assigned station.

**Rotations** – The movement of a lifeguard from one lifeguard station to another at a pre-determined time interval.

**Scanning** – A system of conducting surveillance in which lifeguards perform systematic visual sweeps of the facility, its patrons and their activity.

**Secondary duties** – Lifeguard duties not directly related to preventing drowning and other injuries such as testing the pool water chemistry, conducting safety orientations, administering swim tests, fitting PFDs, cleaning or maintenance, completing records and reports, opening or closing duties and facility safety checks or inspections.

**Shadow lifeguarding** – The process where one lifeguard (usually inexperienced) shadows or follows and works with another experienced lifeguard during surveillance of their zone of responsibility.

**Surveillance** – The state when a lifeguard is fully involved, alert, scanning and ready to respond from his or her assigned station, as opposed to being “on duty” which may mean being on break or conducting secondary duties.

**Total coverage** - A single lifeguard on surveillance supervises the entire swimming area.

**Touch supervision** – Type of supervision where an adult caregiver is within arm’s reach of a child and able to touch him or her when in the aquatic facility.

**Training provider** – An organization providing lifeguard training certification or licensure along with support materials and instructor authorizations. Training providers are typically national organizations such as the American Red Cross or the YMCA of the U.S.A.

**USA Diving** – The governing body over the sport of diving within the United States.

**USA Swimming** – The governing body over the sport of swimming within the United States.

**Waiver** – A legal document that waives a person's right to seek damages from an organization or person.

**Zone coverage** – Lifeguard coverage provided when the total swimming area is divided into zones with overlap between each zone and one lifeguard is assigned to each zone. This provides double coverage within the overlap.

# APPENDIX

**Sample Facility Checklist**

**Sample Injury Chart**

CITY OF XXXXXXXXX  
Daily Facility Checklist

POOL: xxxxxxxxxxxxxx  
Page 1 of 2

DATE: \_\_\_\_\_

	Yes	No	Damaged	Action Suggested	Action Taken
<b>DECK</b>					
AED accessible and battery functional					
Rescue Tubes & Straps in good repair					
Backboards with head immobilizers and straps readily accessible					
First Aid station clean; equipment & supplies accessible and well stocked					
Lifeguard hip packs well stocked					
Telephones working					
Deck not slippery and in good repair					
Deck clear of patrons' belongings					
Instructional and lap swimming equipment stored if not in use					
Lifeguard stands clean and in good repair					
Clear of standing water					
Clear of glass objects					
Lane line reels in good repair and stored properly					
Required signs posted					
Overhead lights working					
Shepherd's crook, ring buoy & line coiled properly and accessible					
Fences and gates secure and in good repair					
Emergency alarms working					
<b>POOL</b>					
Ladders secured properly					
Ladder handles clean and rust free					
Steps not slippery and in good repair					
Drain covers secured properly					
Drain covers clean					
Lifelines and buoys in order					
Water clarity satisfactory					
Pool free of debris					
Gutters clean					
Water temperature satisfactory					
Water chemistry satisfactory					
Underwater lights working					

CITY OF XXXXXXXXX  
Daily Facility Checklist

POOL: xxxxxxxxxxxxxx  
Page 2 of 2

DATE: \_\_\_\_\_

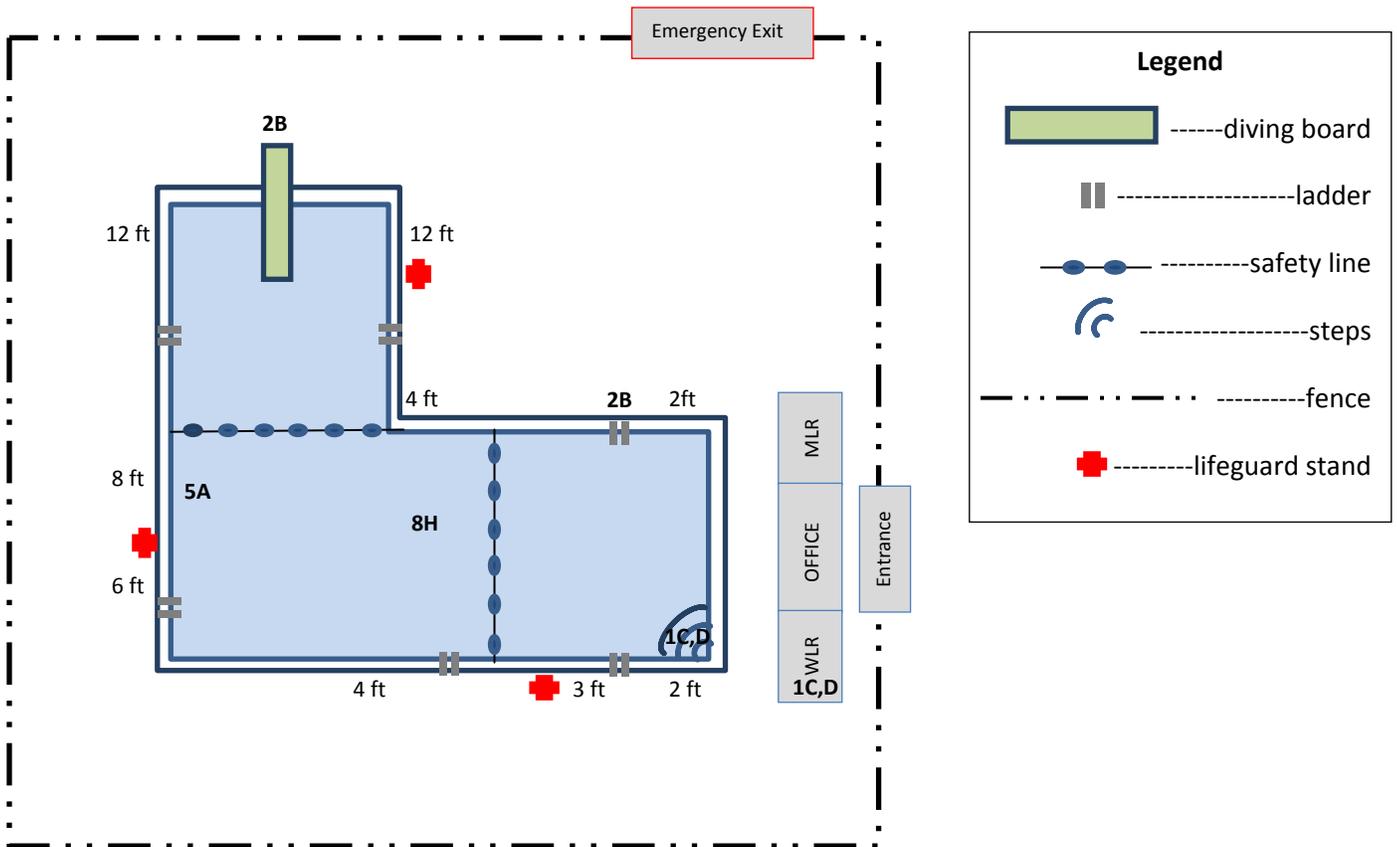
	Yes	No	Damaged	Action Suggested	Action Taken
<b>RECREATIONAL EQUIPMENT</b>					
Rails at diving boards clean & in good repair					
Diving boards and steps clean & not slippery					
Moveable fulcrums locked in forward position					
Removable starting blocks stored properly					
Access to permanent starting blocks restricted					
All pool covers removed and stored properly					
Pool cover carts in good repair and stored properly					
<b>SHOWERS, LOCKER ROOMS &amp; REST ROOMS</b>					
Floors clean and not slippery					
Showers in good repair (no drips)					
Soap available					
Drains clean					
Wastebaskets empty					
Drinking fountains and sinks clean and in good working order					
Signs in good repair and properly displayed					
Walls clean and free of markings					
Toilets and urinals clean					
Mirrors clean and unbroken					
No unpleasant odors					
Toilet tissue available					
Paper towels available					
Doors and windows working properly (including locks)					
All articles removed from lockers daily					
Locker benches clean					
Clear of glass objects					

Please list any maintenance performed not on the list above and any supplies that are needed.

\_\_\_\_\_

\_\_\_\_\_

**SAMPLE INJURY CHART**



**INJURY CODES**

- |                  |                 |
|------------------|-----------------|
| 1. Abrasions     | A. Arm          |
| 2. Cut           | B. Hand         |
| 3. Bruise        | C. Leg          |
| 4. Sprain/strain | D. Foot         |
| 5. Dislocation   | E. Trunk        |
| 6. Fracture      | F. Head         |
| 7. Burn          | G. Spine        |
| 8. Drowning      | H. Whole person |
| 9. Spinal Injury |                 |
| 10. Pain         |                 |