



**Telford & Wrekin**  
Co-operative Council

Protect, care and invest  
to create a better borough

# Open Water Safety

July 2024

# Introduction

Telford & Wrekin Council will provide appropriate arrangements for the management of areas of open water. These measures should ensure that, 'so far as reasonably practicable' all inland open water facilities and other water-based facilities for which the Council is responsible, are maintained in a safe condition for the benefit of all users and the safety of employees.

Within the Borough of Telford and Wrekin there are several parks, open green spaces, local nature reserves and council premises which include areas of open water (both large and small). These include; ponds, pools, other areas of still water, through to brooks, streams, rivers and other water features such as sustainable urban drainage systems (SuDs).

The use of such waters is varied but all enhance the environment for the enjoyment of members of the public, and the development of tourism, recreation, and leisure activities within the Borough. Safety around these water courses is paramount.

Open waters can present a significant risk of drowning to persons if associated hazards are ignored. When weather is warm, swimming in cold water is attractive, and potentially fatal, whilst in winter freezing conditions can make the sites attractive for people of all ages to walk on ice. Both instances have potentially serious consequences if not taken seriously.

The Council will take all reasonable steps to protect people from the danger of open water through its risk assessment process. The Council will adopt best practice from advice and guidance produced by the various subject matter experts and professional bodies, including but not limited to Royal Society for the Prevention of Accidents (RoSPA), Royal Life Saving Society (RLSS), National Water Safety Forum (NWSF) and Shropshire Fire and Rescue Service.

This policy does not include ponds and other water bodies that are within the grounds of school settings and water bodies that are on Telford & Wrekin Council owned land leased to third parties. It also does not include water bodies owned by third parties apart from waters owned by third parties but surrounded by Telford & Wrekin Council owned land including but not limited to:

- Middle Pool;
- Trench Pool;
- Castle and Dandy pools;
- Holmer Lake;
- Madeley Court;
- Randlay Lake (including storm drain and waterfall);
- Strine Brook;

## **Responsibilities, Competency and Training**

The Council acknowledges the statutory duties placed on it for the management of open water under its control and for the need to provide for the safety of all.

Service areas will be responsible for their specific sites where water is located and must ensure that regular documented inspections are made of the site under their control. The site must have an up-to-date risk assessment and Emergency Action Plan where identified by the site-specific risk assessment.

Schools have been provided with a separate open water safety policy.

The Council recognises that the provision of appropriate, adequate information, instruction, and training on water safety both to employees and to members of the public is key to the prevention of accidents and drownings at its sites.

Employees with specific responsibilities for the safety of open water will be competent/suitably qualified (e.g. have attended RLSS National Water Safety Management Programme (NWSMP) or equivalent).

## **Risk Assessment**

Service area managers ('asset owners') responsible for open water sites are required to implement the Council's Risk Assessment. The significant findings of risk assessments (including the actions taken to reduce the hazards) must be recorded on the approved form.

## **Safety Inspections and Hazard Identification**

As dictated by the site-specific risk assessment, routine safety inspections will be undertaken at open water sites. These inspections will include ensuring the availability of appropriate arrangements and resources to provide for the monitoring, maintenance, and repair of public rescue equipment (if deemed necessary via the site-specific risk assessment), edge protection and signage.

The service area will ensure that records of all such interventions in respect of Monitoring, Inspection, Maintenance and Repair are retained for a period of not less than seven years.

The inspection of rescue equipment will be based upon a risk assessment profile determined upon location, public exposure, and record of vandalism. The results of all formal inspections will be recorded, and the documents retained by the service area manager.

Safety inspections will monitor but not limited to:

- The provision and condition of rescue equipment;
- The condition and positioning of safety notices;
- The condition of any edge protection measures;
- Any change to the water's edge or access which has been caused by storm or other change;
- Accuracy of up-to-date information on the council's internet pages

Frequency of all safety inspections and hazard identification are done in accordance with the Council's risk profile for Open Water.

Where the asset is resourced, there will also be an emergency action plan in place.

### **Provision of Information**

The Council's [Green and Open Spaces](#) internet page contains Outdoor Water Safety information and links to highlight the risks of inland water and how best to enjoy the facilities it offers.

### **Premise/Site Information for larger pools and lakes**

As outlined by site specific risk assessments, information will be provided at principal points of access to facilities with open water. This will give details of the inclusion of water-based hazards within the location and will display principal warning signs in accordance with National guidance on Water Safety Signage and the requirements of the Health and Safety (Signs and Signals Regulations 1996). Additional details will also be provided emergency telephone locations and appropriate or telephone numbers.

All safety signage will conform to BS5499-11-2002 where possible.

Where possible, sites shall use pictograms to ensure the maximum impact of the safety messages. Where a risk assessment has previously identified areas known to be attractive to swimming, additional 'No Swimming Signs,' over and above those displayed on the 'Safety Points,' should be displayed at the site. Water safety signs that are intended to reinforce the 'No Swimming' signs should be located at main access points to the site.

### **Warning Signs**

In accordance with the recommendations of the National Guidance for Water Safety; warning signs will be displayed in areas where there is a significant hazard identified as part of the risk assessment process.

Signage will be displayed at appropriate access points near to identified open water hazards. In addition, signs will be displayed at appropriate locations within the site, this may include rescue equipment stands (called safety points) that repeat this information. All signs will be recorded on appropriate site plans and maintained in a reasonable condition. At predetermined intervals, all signage will be inspected by a competent person, with the details recorded and available for inspection.

### **The General Principles for Signage**

As part of the overall safety strategy the following measures should be undertaken to improve and ensure a greater awareness of the potential dangers of the water body. Multi signs should be provided at the main access points to each site with the positioning of these multi signs being determined through the risk assessment process.

These signs should indicate safety messages relating to the danger of the water i.e.

- Location;
- Map of the site with lifesaving points and help points identified (where such equipment is installed);
- Do not enter the water;
- No swimming;
- Action to be taken in an emergency;
- Examples of safety signage to be found at the location (wherever possible signs should be accessible for all users and use pictograms);
- Parents - please keep your children under supervision at all times;
- Signs reinforcing safety messages should be placed at strategic points along the water's edge;
- Where possible space will be provided for the positioning of temporary notices if not included in the permanent layout e.g. Danger - Ice take care! Danger – Blue/Green Algae

### **Edge Protection and Exclusion**

Unsupervised open water presents a high level of risk due to the nature and use of the adjacent walkways and local vicinity. To provide for a consistent approach to water side safety, the Council has adopted best practice as recommended in RoSPA's [Managing Safety at Inland Waters publication](#), which assists in developing a consistent approach to certain levels of risk, presented in an urban waterside environment.

### **Monitoring and Control of activities alongside the Water Edge**

Where activities (e.g. pond dipping) or work (for example de-silting, rubbish collection, water edge treatment, improvements) is being carried out to open water areas, a risk

assessment will be carried out by the lead organiser or lead contractor before being undertaken.

## **Design and Control of Facilities Adjacent to Open Water**

When facilities such as play areas, external recreational or sporting facilities, walkways, or planting areas, etc. are to be developed adjacent to or near open water, a risk assessment should be undertaken by the Service Manager or lead promoter. This careful consideration of the risks should review both design and maintenance and should be made in accordance with the Construction (Design and Management) Regulations 2015 and in full consultation with all concerned parties. The siting and design of such facilities should be a tripartite decision by all interested Council Directorates to ensure the safety of all users of the facilities and employees employed to maintain the completed facility.

## **Planning and Adoption of Land**

Before adoption of any area land with or adjacent to open water, the Council will require the original owner to provide a copy of their open water risk assessment.

In relation to Sustainable Urban Drainage Systems (SUDs), the council ensures through planning conditions/obligations that clear maintenance and management arrangements are in place for the lifetime of the asset.

## **Rescue Equipment**

Where necessary, and if identified through site specific risk assessments, the asset owner will ensure water life-saving equipment is readily available. Such water safety points must be of solid construction and be visible both day and night. Consideration should be given, as to who may need to access this equipment (i.e. people with disabilities or young children), and the height of the container above the ground should reflect this assessment. The locations of these Water 'Safety Points' will be determined by the risk assessment process and will reflect likely points of access to the water and places where a rescue attempt may be safely attempted. In all cases a person should be able to see a Water 'Safety Point' from whatever location they are positioned when near the open water.

All Water safety points should be identified by a unique identifying number (asset number), recorded on a site plan, and regularly checked (to be determined by the risk assessment), with findings recorded.

Where practicable life rings are considered suitable for deep water such as lakes and pools. Throw lines are more suitable where the edge gradient is shallow and directional stability is required. Where present, rescue equipment will be regularly inspected and replaced as required. Throwlines will be inspected on a quarterly basis by Shropshire Fire and Rescue. Where persistent vandalism occurs the use of alternative anti vandal lifebuoy

stands will be considered; if persistent problems of vandalism/theft to rescue equipment occurs reasonable action will be taken to replace such equipment, allowing for one spare rescue equipment per location.

Where the risk assessment identifies that vandalism or theft will adversely affect the integrity of the Water 'Safety Point,' an alternative strategy may be adopted such as locked cabinets with access via telephone call to emergency services.

## **Ice on Open Water**

When ice develops on open water, the asset owner will ensure that appropriate and adequate warning signs are displayed at all access points around the body of water. Preferably, ice warning signage/symbols will be permanently present on site specific signage where signage is indicated by risk assessment. If it is not present then if need indicated by risk assessment temporary signs will be erected at a point when ice forms and removed when the ice thaws – where possible, they will be inspected while in place.

The location of such signs will be to ensure that they give a clear warning of danger to any visitors to the site. The service area will be responsible for the placement and removal of warning signs once the ice risk has subsided.

When ice forms on open water it is the Council's policy not to break ice as it forms, unless this must be done as part of any water quality monitoring, or for survival of wildlife.

## **Environmental Management**

Where wildlife is at risk, or pollution (oil/sewage/etc.) is found to be present in, or entering open water, employees and/or the local managers must report such occurrences immediately to the asset owner, who should seek advice from the Environmental Agency on all water pollution matters to obtain suitable outcomes.

Several open water sites are managed for nature conservation helping improve the Borough's biodiversity. On such sites, specific consideration will be given to the impact any safety management processes and/or remedial works would have on the integrity of the conservation value of the site. Asset owners will be responsible for identifying the delivery of appropriate water safety measures that least affects the specific conservation requirements identified for the site. An environmental assessment may be required prior to any works taking place.

Sustainable Urban Drainage Systems (SUDS) are not adopted by the Council and if installed as part of a development remain within the ownership of the developer and/or its management company.

## Water Quality

### Blue-green Algae

The presence of Blue-green Algae can present a health hazard to humans and animals. In summer, particularly when there has been little rainfall, water can become stagnated. These conditions may result in the formation of blue-green algae. In such cases the asset owner will ensure that suitable warning signs are displayed around the affected area and that water based recreational activities are appropriately restricted until water conditions improve.

### Leptospirosis

Weil's disease (or leptospirosis) is a bacterial infection caused by allowing water that has been contaminated by rat's urine to come into contact open wounds, the eyes, or with the mucous membranes. Most cases of Weil's Disease occur in the summer and early Spring. Water sampling will not detect the presence of the micro-organism.

It is a rare condition in the UK. The disease starts with flu-like symptoms such as a headache or muscle pains. More severe cases can lead to meningitis, kidney failure and other serious conditions. In rare cases the disease can be fatal.

As the microorganism cannot be easily detected in humans without testing this policy requires control measures and assessments to be in place for council officers and contractors working around water bodies.

## Use of Open Water for Activities

There is currently no water body owned by Telford & Wrekin identified in the Borough for open water swimming. Other water related activities can only be undertaken with the permission of the Council under license arrangements which includes a fee. Therefore, members of the public and groups are not encouraged to make use of such areas. Open water for activities requires careful monitoring and inspection regime which the council does not have in place. Aside from the control measures set out in this policy, health issues arising from any open water swimming or activity is done so at the individual's risk.

## Recording and Reporting of Accidents

In the absence of first aid equipment across the Council's green and open spaces, the Council wants everyone to be safe when visiting green and open spaces that have water features within them. Members of the public are encouraged to report incidents using the emergency contact number displayed on the 'multi-signs' at the open water sites.

The priorities for dealing with any accident/incident are:

- Do not enter the water - your first action is to summon assistance!



- Dial 999 or 112, state which emergency service you require, nature of incident, your
- Location, best access point and contact details.
- Use life-saving equipment (if available) to bring the casualty to shore.
- Make the casualty secure, render first aid (if you are competent).
- Make the area safe to prevent any further accident/incidents.
- Record all relevant information to assist with any subsequent inquiry.

The Council works closely with the Royal Life Saving Society on managing water safety across our green and open spaces and further details on advice can be found on the [Royal Life Saving Society website](#).

Further information on how to rescue a person from drowning can be found on the [Royal Life Saving Society](#) website.

## **Emergency Action Plans**

If permission is granted by the Council to groups/ individuals to use open water for activities, then an Emergency Procedure for open water facilities is required. As a minimum, this will contain the following:

- Drowning;
- Water rescue;
- Ice entrapment;
- Public disorder;
- Notification of a first aid or another medical emergency;
- Identification of water pollution;
- Flooding;
- Severe weather

A template document is available to assist groups/individuals.

## **Outdoor Water Safety Group**

The Council has established an Outdoor Water Safety group. This group comprises officers with premise management and open space management for areas of open water along with advice sought where required from the Council's Health & Safety Team and other interested parties.

The group's function is to ensure a consistent approach is achieved for both employee and public safety which is effectively managed with regards to outdoor water safety across the borough.

The group will quality assure existing processes, review risk assessments, inspections, carry out investigations, make required improvements and if required report to the Senior

Management Team. The work to ensure that employee and public safety is effectively managed with regards to outdoor water safety across the borough.

Although the Council holds the land management responsibilities for a number of sites across the borough, there are also areas of open water within the borough that are not owned or managed by the council. In such circumstances the Council will encourage landowners to adopt an open water safety policy where practicable.

### **Further information**

Should you require any further information, please contact 01952 380000.

There is a range of information on Open water, signage, and other legislative areas applicable to water and this policy which should be read where required for the protection of all interested parties to aid compliance and safety for all.

[The Royal Life Saving Society UK \(RLSS UK\)](#)

<https://www.hse.gov.uk/pUbns/priced/l64.pdf>

<https://www.rospa.com/Leisure-Safety/Water/inland>

<https://www.rospa.com/leisure-water-safety/water/advice/signs>

[The Bathing Water Regulations 2013 \(legislation.gov.uk\)](#)

**Revision Table**

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1.0	Editing	Draft	July 2024