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## Hotel Pool and Spa Safety Begins With P.R.M.

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***(PREVENTION • RECOGNITION • MANAGEMENT)***

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by Gerald M. Dworkin

Since water and pool safety is such a huge issue for hotels, it is important to understand that the primary responsibilities of hotel management are:

- A. To Prevent incidents;
- B. To Recognize incidents or their potential; and
- C. To Manage incidents or their potential.

### PREVENTION

In order to prevent incidents, management and staff should develop a series of prevention strategies to include the development and posting of appropriate rules and regulations, and the enforcement of these rules and regulations.

A comprehensive risk management program should be developed and implemented. This involves input by all staff and management personnel to (A) identify physical hazards and to remove those hazards or warn guests about them; and (B) identify activities which place guests at risk, and to prohibit these activities or safeguard the visitor while he or she is engaged in those activities.

The risk management program should include a public education component, a hazard and risk assessment, development of prevention strategies, implementation guidelines, and training. If no Lifeguard services are provided, sufficient notice must be provided as follows:

- No Lifeguard On Duty
- Swim At Your Own Risk
- Children Must Be Carefully Supervised At All Times
- No Swimming Without Another Adult In Attendance
- No Diving (in less than 9 feet of water)
- Children Under The Age of 15 May Not Use The Pool Unattended Without Adult Supervision

Photo of an indoor pool taken on June 30, 2002. Note the extremely cloudy water condition which should have warranted the closing of this pool. Yet, the pool was fully operational with hotel guests using the pool at the time this photo was taken.

It is the responsibility of management to develop Standard Operating Procedures (SOPs) or Standard Operating Guidelines (SOGs) which guide or govern staff (i.e. swimming pool or facility operators,

maintenance personnel, managerial personnel, Lifeguards, etc.) in their actions. These SOPs or SOGs would include operational expectations, policies, procedures, etc.

Emergency Response Plans (ERPs) should be developed and implemented, and all staff and management personnel affiliated with the facility need to participate in emergency response drills to assure their ability to respond to emergency situations when or should they occur. The development of the ERPs should include every conceivable contingency. Also, as a result of conducting emergency response drills, personnel develop a greater appreciation for the need to prevent the incident from occurring in the first place, and are better prepared to respond to the emergency should one occur. Managers/operators of any aquatic facility must develop and administer an appropriate risk management program and all personnel involved in the operation of the facility must participate in this program. The scope of a risk management program is to eliminate danger associated with the use of the aquatic facility.

A comprehensive threat analysis should be conducted to:

- Assess the physical facility for hazards;
- Remove the hazards or safeguard the public by warning them of the hazards; Assess activities that place patrons at risk; and
- Prohibit those activities or develop and implement appropriate safeguards to protect patrons engaged in those activities

## RECOGNITION

If Lifeguard protective services are provided, Lifeguard personnel must learn effective surveillance procedures and techniques that are specific to the facility they are protecting. The 30-Second-Rule and the 10/20 Rule should be followed by all personnel. It is the responsibility of management to guarantee the Lifeguards' ability to adhere to these standards.

The 30-Second-Rule implies that Lifeguards must be able to provide effective surveillance of their entire area of responsibility and must be able to effectively supervise from the furthest extremes from one side to the opposite side and back within a 30-second period. If this is not possible due to the size of the area, or the number of people within the assigned area, then the area must be confined or additional Lifeguards must be positioned.

The 10/20 Rule implies that Lifeguards, while providing continuous and effective surveillance, must be able to assess the potential victim's distress and must be able to determine if intervention is required within a period of 10 seconds from the initial recognition. If intervention is required, the Lifeguard must be able to intervene (i.e. effect the rescue) within 20 seconds. In order for this to be accomplished, the Lifeguard must be appropriately positioned to be able to respond anywhere within his/her area of responsibility within the 20-second period.

Lifeguards must be vigilant in their duties while at their assigned stations and must provide continuous and effective surveillance. They must anticipate the rescue and must remain alert to recognize distress victims in, on, and around the water, including victims at the water's surface as well as submerged victims below the water's surface.

When groups are using the facility, it is the responsibility of the group leadership to provide supervision, regardless of whether or not Lifeguard protective services are provided, of participants in, on and around the

water. If Lifeguard protective services are not provided, management must advise the group that there are no Lifeguards on duty, and that the group leaders must provide stringent and effective surveillance and supervision while the participants are in, on and around the water. Management should provide the group leadership with supervisory and safety guidelines that must be followed while the aquatic facility is in use.

When an incident occurs at a “supervised” facility that is not immediately recognized by supervisory personnel, it is typically due to one of three factors, referred to as RID Factors.

**R = Recognition:** Supervisory personnel fail to recognize the victim’s distress or the potential for the incident, because they were not appropriately positioned or vigilant in their duties.

**I = Intrusion:** Supervisory personnel fail to identify and recognize the incident or its potential because they are engaged in activities (i.e. maintenance duties) which intrude upon their ability to provide effective surveillance.

**D = Distraction:** Supervisory personnel fail to recognize the incident or its potential because they are engaged in activities (i.e. talking on the telephone, reading, talking to patrons or other staff, etc.) that distract from their level of attention and vigilance.

Lifeguard personnel are taught general surveillance principles and procedures within their Lifeguard training courses. However, it is the responsibility of management to instruct Lifeguards on the procedures which must be used and followed at the specific facility in order to supervise guests in all activities when in, on, and around the water. The surveillance procedures for each facility are based on the design of the facility, the number of guests, the number of Lifeguards or other supervisory personnel, the activities the guests are engaged in, environmental factors, etc.

Lifeguards must understand the factors which impact the Standard of Care as it relates to their ability to prevent, recognize, and manage incidents or their potential. Management must continuously assess the activities and numbers of guests in, on, and around the water in order to determine the number of Lifeguards, or other supervisory personnel, that are required to assure the safety of the guests.

When Lifeguard protective services are provided, Lifeguards must never be allowed “off duty” while around the pool area. The Lifeguard should always be positioned appropriately to provide surveillance and other protective services required of guests. Other assigned duties must never intrude upon the Lifeguard’s ability to provide effective surveillance. A Lifeguard must never talk socially to another Lifeguard or anyone else while on duty, in order to prevent distraction from surveillance responsibilities.

## MANAGEMENT

Management of the incident or the potential for incident not only refers to the activation of an Emergency Response Plan (ERP) in the rescue of patrons, but also to the enforcement of rules and regulations. Facility rules and regulations must be enforced consistently and appropriately in order to prevent incidents. An active and continuous assessment of physical hazards must take place and the mechanisms must be developed to identify these hazards and to either remove them or warn guests of them.

A continuous assessment also must be made of the activities guests are engaged in within the facility in order to determine their levels of risk. When the potential for an incident is recognized due to a physical hazard or elevated risk activities, supervisory personnel must remove the hazards or prohibit the elevated risk activities.

Lifeguards and/or supervisory personnel must recognize an incident at its inception and intervene in order to prevent the progression of the incident and the deterioration of the victim's condition.  
Note the toys and rescue equipment (ring buoys) floating in the pool.

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