



## Updated

### Royal Life Saving CEO Note on COVID-19 Advice for Aquatic Industry and Swim Schools

#### Disclaimers:

- **This position is current as at 10am (AEST) on 14 May 2020**
- **Our position must be considered against our remit as a national peak body, with a key focus on reducing drowning and promoting safe aquatic participation**
- **This should in no way override advice provided by Federal, State and Territory Governments**

Royal Life Saving continues to closely monitor the COVID-19 Pandemic through official sources, including the Australian Government Department of Health, and State/Territory Government Departments of Health.

#### Mapping Swimming and Water Safety Programs and other Aquatic Activities to Australian Institute of Sport (AIS) Framework for Rebooting Sport

On 1 May 2020, the Australian Government released the AIS Framework for Rebooting Sport. The AIS Framework includes measures to guide a return to aquatic sports (ie, competitive swimming, water polo, artistic swimming).

The AIS Framework does not directly address measures relating to swimming and water safety programs and other common aquatic activities including pool-based lifesaving, and aqua aerobics.

Royal Life Saving had concerns that this omission would negatively impact on aquatic centres and swim schools as they sought to re-open and comply with the Government's easing of restrictions. This segment of industry is responsible for a significant proportion of employment and participation.

In a COVID-19 risk–reward model, Royal Life Saving considers restarting these activities to be vital in the context of:

- The business case and viability of re-opening aquatic facilities and swim schools
- Returning the vast number of employees currently stood down (noting many are supported by JobKeeper)
- Returning highest number of community members, particularly children to aquatic activities

The AIS Framework for Rebooting Sport reinforced the principles of social distancing, minimising direct contact between athletes, and athletes/coaching/spectators, and participant limitations – initially >10. It included three levels for return to sport. In the case of swimming these are shown in appendix 1. The AIS Framework can be found in full [here](#).

On Monday 3 May 2020, Royal Life Saving presented an analysis and request for clarification and action to the Australian Government, Department of Health (Office of Sport). Our objectives were to make the case that swimming and water safety programs (swimming lessons) and other aquatic activities could be mapped to the AIS Framework, and in most cases be allowable under AIS Level B. We now note that many states are effectively implementing Level B.

A simplified version of this analysis can be found in Appendix 1.

#### ***COVID-19 Sport and Health Advisory Committee Response***

On Wednesday 13 May 2020, Royal Life Saving received confirmation that the COVID-19 Sport and Health Advisory Committee, as proposed by the Australian Health Protection Principal Committee (AHPPC) and endorsed by National Cabinet, held its inaugural meeting (7 May 2020) and considered the Royal Life Saving proposal concerning the resumption of aquatic activities in a COVID-19 environment.

The Committee considered that the Royal Life Saving proposal is consistent with the National Principles for the Resumption of Sport and Recreation Activities and the AIS Framework for Rebooting Sport in a COVID-19 Environment. Specifically, its alignment to AIS Level B.



### ***Implications of this advice for restarting programs***

Royal Life Saving's view is that following the implementation of a facility risk assessment in accordance with the Guidelines for Safe Pool Operation (GSPO), and while adhering to local jurisdictional policies with respect to re-opening swimming pools, social distancing, and hygiene:

- Swimming and water safety programs, especially those where the learner is confident, independent, and able to swim and maintain buoyancy unaided should be included for consideration to a return alongside swimming sport and club activities
- Programs that cater for beginning swimmers (child and adult) who are unable to swim or maintain buoyancy unaided, and who require contact or holds in teaching are more difficult to deliver in the context of social distancing, contact exclusions, and therefore may need to be reconsidered until the Government amends social distancing, contact exclusions. We note that this is effectively at Level 3 in the AIS Framework is approaching in several states in June.
- Our initial risk assessment of infant aquatics points to issues related to social distancing between parents and parents, and teachers and parents. Our view is that these activities would require significant adjustment to teaching protocols to meet the requirements of AIS Level B
- Aqua aerobics with adjustments also meets the requirements of AIS Level B
- Pool lifesaving with adjustments also meets the requirements of AIS Level B
- Disability programs following risk assessment, specifically of independence and confidence in the water and need or otherwise for holds and/or contact may meet the requirements of AIS Level B

While we expect that many will be disappointed that current social distancing rules impact on programs that require close physical contact for instructional and safety purposes, we point to the benefits of this wider outcome. We will continue to seek adjustments in consultation with Government and industry.

We expect further developments in this space. We appreciate the argument being put that social distancing in schools may provide a more relaxed approach in due course for the learn-to-swim sector.

### ***Venue restrictions***

On 8 May 2020, the Australian Government COVID-19 released its three-step plan for easing restrictions. This three-step plan is significant for the aquatic industry and swim schools and involves gathering restrictions in three increments: up to 10 people, up to 20 people, up to 100 people. This is a key component of the AHPPC public health advice to the National Cabinet.

This stepped approach is being implemented by State and Territory Governments. In some cases this has been interpreted on a pool by pool basis, which means that where an aquatic facility has two swimming pools, these facilities may have two lots of 10 people at the venue. Unfortunately, in some cases the notion of one person per lane has been retained, even though this position has been updated in the AIS Framework.

The viability of re-opening aquatic facilities and swim schools is significantly impacted by these 10-, 20-, 100-people gathering restrictions. However, there are some considerations/adjustments that should be sought.

Regarding venue gathering restrictions, we note:

- The removal of previous advice regarding one person per lane (in updated AIS Framework)
- Aquatic facilities are often large-scale venues, highly supervised environments that implement many risk controls, including zonal management for user activities and groups
- Covering key expenses, including maintenance, energy is reliant on high venue utilisation rates

On this basis, we support, but have not tested, the position that:

- Aquatic facilities are large-scale venues with the capacity to manage social distancing across multiple groups of 10, 20 or 100 people, using zonal management



- Multiple groups (ie, 2 x 10, 20, 100 people) should be allowable in a swimming pool where social distancing and one person per four square meters can be achieved
- The policy of one person per swimming pool lane, should be replaced in State and Territory policies with the AIS updated position of “with limited numbers maintaining social distancing requirements” (updated 8 May 2020).

The information above is provided to clarify our position. It should not override local jurisdictional policies and is provided to assist groups in risk assessments and advocacy to State, Territory and Local Governments.

Please check with your State or Territory Governments for their policies relating to swimming pool re-opening.

### ***Update on Government Support***

In Royal Life Saving’s CEO [statement on COVID-19 Pandemic and the Case for Re-opening Aquatic Centres and Swim Schools](#) issued on 30 April 2020, we called on Government(s) to consider the recommendations below:

- Ramp up services throughout winter to ensure that aquatic centres and swim schools are fully operational in mid-spring and well before summer 2020/21. This involves:
  - Providing short-term funding if required in areas such as maintenance.
  - Supporting swim schools.
  - Retraining employees in areas of COVID management, social distancing, cleaning protocols.
- Stimulate a return to structured swimming and water safety activities by:
  - Ensuring schools have the budget to restart school swimming programs.
  - Investing in swimming and water safety vacation programs.
  - Investing in sport vouchers for swimming and water safety
- Develop strategies to support the Aquatic Workforce by:
  - Ensuring a quick return to the industry for employees.
  - Developing programs to leverage aquatic and recreation centres.
- Stimulate investment in community aquatic centres and swim school infrastructure by:
  - Providing opportunities for a coordinated approach to aquatic centre and swim school development.

Royal Life Saving has been working with Government and the industry, and advocate these measures. We note that in recent days, Governments in Victoria, South Australia and Australian Capital Territory have announced grants and funds that may assist aquatic facilities and swim schools. We will continue to advocate for this.

### ***New Guidelines for COVID-19 in Aquatic Facilities***

Royal Life Saving and the National Aquatic Industry Safety Committee (NAISC) released [new guidelines on the risk management of COVID-19 in Aquatic Facilities](#) on 13 May 2020, which combine the latest information from Safe Work Australia, the Department of Health and its replica agencies in each State and Territory, and are available free via the Royal Life Saving website. RLS State and Territory Member Organisations have released local guidance and are available to assist those creating risk assessments for re-opening.

Please let us know if we can assist you further. We love aquatics, are committed to industry and believe community safety is paramount.

**Justin Scarr**

**Chief Executive Officer**

**15<sup>th</sup> May 2020**



**APPENDIX 1 Mapping Australian Institute of Sport (AIS) Framework to Swimming and Water Safety Programs and other Aquatic Activities.**

The following table is an analysis of the implications of the AIS Road Map Framework for wider community aquatics and swimming activities.

The AIS Framework reinforces the principles of social distancing, minimising direct contact between athletes, and athletes/coaching/spectators, and participant limitations – initially >10.

It included three levels for return to sport. In the case of swimming these are shown below:

The extract below is the component relating to swimming.

CATEGORY	AIS Level A	AIS Level B	AIS Level C
Swimming (Sport)	In-water training (solo) in own pool or open water.	1/5 Use of communal pool with limited numbers, 1 athlete per lane. 7/5 Adjusted to: Use of communal pool with limited numbers maintaining social distancing requirements.	Full training and competition.

**Royal Life Saving analysis:**

**Objectives:**

- Advocate for inclusion of swimming and water safety programs and other activities into the AIS Framework to support the wider re-opening of aquatic facilities and swim schools

**Process:**

- Royal Life Saving has developed a risk analysis of aquatic activities categories extracted from Guidelines for Safe Pool Operation (GSPO)
- A feasibility assessment of those activities with regard to the likelihood that maintaining social distancing can be achieved with or without adjustment
- The feasibility assessment is set at:
- High. High likelihood that measures will maintain social distance requirements
- Medium. Medium likelihood that measures will maintain social distance requirements
- Low. Low likelihood that measures will maintain social distance requirements
- This was provided to Government and subsequently reviewed by COVID-19 Sport and Health Advisory Committee (7 May 2020), with a formal response received on 13 May 2020.

**Notes:**

- The AIS Framework pre-dates announcements regarding potential or actual pool openings
- Level B is presented in the table below for ease of reading.
- AIS Framework Level C is effectively full resumption
- A feasibility assessment of an activity’s likelihood of maintaining social distancing is provided with or without adjustment

This table may be used for planning purposes. We will continue to work with the Government and industry to seek further clarifications as the Government’s Pandemic plan evolves, and we see further opportunities to advocate for a quick return to the pool.



**Table: Mapping aquatic activities, swimming lessons to the AIS Road Map Framework Level**

GSP0 REF.	CATEGORY	Social Distancing Feasibility			Notes	AIS Level B Note: Text below is an adaptation of AIS terminology and assumptions at Level B including 10-person rule
		Teacher/Students >1.5m	Students/Others >1.5m	No Contact		
SV7.	Infant Aquatics (6 mth - 2yo)	Low	Low	Low	Adjusted teaching needed. Reduced ratios. Teaching space management	Caution on feasibility of non-contact teaching for this cohort, suggest N/A until change in position on contact.
SV7.	Toddlers (2-3yo)	Low	Low	Low	Adjusted teaching needed. Reduced ratios. Teaching space management	Caution on feasibility of non-contact teaching for this cohort, suggest N/A until change in position on contact.
SV7.	Pre-school (3-5yo) Low to moderate competency, independence	Low	Low	Medium	Adjusted teaching needed. Reduced ratios. Teaching space management	No contact teaching less feasible. May be feasible for highly independent preschool swimmers
SV6.	Beginners (6yo plus) - With little or no experience - In shallow water (<900mm)	Low	Low	Low	Adjusted teaching needed. Reduced ratios. Teaching space management	Risk assessment Caution on feasibility of non-contact learn-to-swim teaching for this cohort, suggest not applicable for all but those who can swim 10m independently.
SV6.	Intermediate students - Basic skills - Can swim 25 metres with a recognisable stroke - Can demonstrate comfort and confidence out of own depth	High	High	High	Reduced ratios, lane management. Adjusted activities	Indoor/outdoor pool where number limitation can be achieved (not more than 10 students and/or other personnel in total) and with adequate spacing (not more than 1 person per 4m <sup>2</sup> ). No contact teaching
SV6.	Advanced students - Able to swim 50 metres using two recognisable strokes - Demonstrate one survival stroke in deep water - Display comfort and confidence in the aquatic environment	High	High	High	Lane management Adjusted activities	Indoor/outdoor pool where number limitation can be achieved (not more than 10 students and/or other personnel in total) and with adequate spacing (not more than 1 person per 4m <sup>2</sup> ). No contact teaching, supervision possible
	Lifesaving courses	High	High	High	Lane management Adjusted activities	Indoor/outdoor pool where number limitation can be achieved (not more than 10 students and/or other



						personnel in total) and with adequate spacing (not more than 1 person per 4m <sup>2</sup> ). No contact teaching, supervision possible
SV8.	LESSONS (beginner) People with a disability	Risk assessment	Risk assessment	Risk assessment	Definition too broad, risk assessment based on competency, need for close contact in instructions, supervision ratio	Risk assessment Indoor/outdoor pool where number limitation can be achieved (not more than 10 students and/or other personnel in total) and with adequate spacing (not more than 1 person per 4m <sup>2</sup> ). No contact teaching, supervision possible
SV10.	Aqua exercise classes low impact classes undertaken in varying water depths.	High	High	High	Note high levels of COVID-19 At risk populations Lane management	Indoor/outdoor pool where number limitation can be achieved (not more than 10 students and/or other personnel in total) and with adequate spacing (not more than 1 person per 4m <sup>2</sup> ). No contact teaching, supervision possible