

Request:	Freedom of information request - swim teaching
Ref:	ELIR00423
Received:	10.11.24
Responded:	19.11.24

Request

Does your leisure company have any (formal or informal) policies or common practices regarding the duration in which swim teachers carry out their lessons? Please can this be provided and/or explained.

Specifics I would like included:

- The maximum duration swim teachers teach consecutively - without a break*
- The amount of classes this maximum includes and their length.*
- Whether lessons have a gap in between them or are they back-to-back.*
- Whether there's a minimum required time away/break from lessons before a teacher can recommence them*
- Details regarding both in water, and poolside teaching.*
- Whether this follows policy from an external organisation/s that governs or regulates swim teaching? If so, what organisation is this?*

Any other additional information would be greatly appreciated.

Response

Legislation:	Freedom of Information (Scotland) Act 2002
Category of response:	Partial Release of Information
Exemptions applied:	FOISA Section 38(1)(b) Personal Information

Your request has been processed and considered under the terms of the Freedom of Information (Scotland) Act 2002 (FOISA) and our response is below:

Does your leisure company have any (formal or informal) policies or common practices regarding the duration in which swim teachers carry out their lessons? Please can this be provided and/or explained.

Specifics I would like included:

1. The maximum duration swim teachers teach consecutively - without a break

Swim teachers should receive 15 mins off poolside every 2 hours, where they have rescue responsibility. This is purely time away from poolside, and not necessarily an official break. This guidance has come from Swim England/ ASA who allow for teaching up to 2.5 hours. We follow CIMSPA risk assessment templates which also cover this.

The Amateur Swimming Association (ASA) is the National Governing Body for swimming in England.

[Swim England Teacher's Hub](#)

[Best Practice within your swimming lessons](#)

CIMSPA is the professional development body for the UK's sport and physical activity sector, committed to supporting, developing and enabling professionals and organisations to succeed and, as a result, inspire our nation to become more active.

[CIMSPA](#)

2. The amount of classes this maximum includes and their length.

There is no detail on the maximum number of classes as it depends on the programming of each venue.

We offer a variety of aquatic classes.

Early Years

Our Pre-School programme specifically designed for ages 0 - 4 years, duration of each class is 25 mins.

Junior

Swim Skills 1, 2, 3, 4 duration of each class is 25 mins

Junior Skills & Drill – duration of class is 50 mins

Adult

Beginner, Improver, Stroke Development - duration of each class is 50 mins

3. Whether lessons have a gap in between them or are they back-to-back.

We aim to have a minimum of 10 mins between classes.

4. Whether there's a minimum required time away/break from lessons before a teacher can recommence them

Please refer to above, however there is a minimum 30 mins break for shift over 6 hours and for staff aged 16/ 17 years this is for shifts over 4.5 hours.

Details regarding both in water, and poolside teaching.

Edinburgh Leisure predominantly teaches from the poolside and teachers are the lifeguards for their own classes. All of the above information is in relation to this.

5. Whether this follows policy from an external organisation/s that governs or regulates swim teaching? If so, what organisation is this?

Detailed in above response. Policies from Swim England/ ASA who allow for teaching up to 2.5 hours. We follow CIMSPA risk assessment templates which also cover this.

Response Documents Attached

1. Swimming Pool Operation Risk Assessment – blank copy of our risk assessment template
2. APLC Pool Operation_Redacted – a completed copy of the risk assessment for Ainslie Park Leisure Centre. All of our pools will have their own version detailing specifics for their pool and operation.
3. HSE Safety in Swimming Pools
4. CIMSPA Professional Standard – Swimming Teacher
5. Swim England Handbook
6. Teaching in the Water Safety v15-1

Further Information Links

[CIMSPA Professional Standards Swim Teachers](#)

[Swim England](#)

[Edinburgh Leisure's Coaching Classes](#)

There's also some excellent information in the STA website:

[Swimming Teachers Association](#)

Exemption Applied

Section 38(1)(b) of FOISA provides that information is exempt information if it constitutes - (a)personal data of which the applicant is the data subject; (b)personal data and the first, second or third condition is satisfied; (c)personal census information; or (d)a deceased person's health record.

This information is exempt from disclosure under Section 38(1)(b) of the Freedom of Information (Scotland) Act 2002.

In respect of this request, which is partially refused, please take this as notice under FOISA, that we consider the information as exempt from disclosure under the Act.

Exemption(s): Section 38 (1)(b) Personal Information

Edinburgh Leisure Head Office
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Registered Scottish Charity No: SC027450
VAT Reg: 703 762 349 Company Reg: 179259



Edinburgh Leisure
The Biggest Club in Town

Why exemption(s) applies

Personal data is information from which an individual can be identified. Information concerning the names, job titles if the staff conducting the risk assessment have been withheld from the risk assessment document provided as this information is the personal data of the individuals concerned and is exempt from disclosure under section 38(1)(b) of FOI(S)A.

In terms of Article 5(1)(a) of the UK GDPR, personal data must be processed lawfully, fairly and in a transparent manner in relation to the data subject. We can identify no legal basis for disclosure of personal data of the individual members of staff concerned. The staff/third parties whose personal data are contained in the risk assessment document attached would have a reasonable expectation that this information about them would not be disclosed into the public domain. We do not have their consent to disclose this information about them and to do so would be neither lawful nor fair.

Public Interest (where relevant)

As section 38(1)(b) is an absolute exemption where disclosure would contravene the Data Protection principles in Article 5(1) of the UK GDPR) it is not subject to the public interest test.

This concludes your request **ELIR00423**.

Please treat this as a Refusal under Section 38(1)(b) Personal Information and notice in accordance with Section 16 of the Freedom of Information (Scotland) Act 2002.

If you are unhappy with this response to your request, or otherwise unhappy with how we dealt with your request you have the right to request a review from us under Section 21 of FOISA by writing to foi@edinburghleisure.co.uk

Your request should explain why you wish a review to be carried out and should be made within 40 working days of receipt of this letter, and we will reply within 20 working days of receipt.

Should you remain dissatisfied with the outcome of the review, you then have the right to make a formal complaint to the Scottish Information Commissioner.

- **Email** to: enquiries@foi.scot
- **Post** to: Scottish Information Commissioner, Kinburn Castle, Doubledykes Rd, St Andrews, KY16 9DS