Highland Council
Water Safety Policy

1. Introduction

1.1 The Highland Council area covers 26,484 square kilometres which is 11.4% of the land area of Great Britain and 33% of the land area of Scotland. The geography is often challenging and includes nearly 5,000km of coastline, in excess of 640 named freshwater lochs, 784 rivers contained within 59 catchment areas and the Caledonian Canal. The majority of reservoirs are formed from pre-existing lochs.

1.2 Highland Council has responsibility for 10 harbours and the management of many other small piers, harbours, and jetties throughout the Highlands.

1.3 Highland Council area also hosts a unique inland Lifeboat Station on Loch Ness which is the second-largest Scottish loch by surface area. The depth of Loch Ness means that it is the largest by volume in the British Isles and it contains more water than all the lakes in England and Wales combined. Its deepest point is 230 metres making it the second deepest loch in Scotland after Loch Morar which is also situated in the Highland region area.

1.4 There are 16 swimming pools and 1 paddling pool managed by High Life Highland (HLH) which is a charity formed on the 1st October 2011 by Highland Council. HLH manage their own risk assessments for their areas of responsibility and will work in conjunction with Highland Council to provide safety guidance for appropriate swimming activities and outdoor adventure activities (see 3.6).

1.5 4 boating ponds are located within the Highland Council area. They are situated at Whin Park, Inverness; Pefferside Park, Dingwall; Tain Links, Tain and Millbank Park, Thurso. These form part of the Highland Council or Common Good estate and previously when they have been operational High Life Highland have overseen concession agreements with the various operators.

1.6 Every year the National Water Safety Forum (NWSF) publish a Water Incident Database (WAID) that records water-based fatalities subdivided into various categories. The most recent figures for Highland identified 5 fatalities in 2021. Other recent and available figures are 9 fatalities in 2020, 5 in 2019, 6 in 2017 And 10 fatalities in 2016.

1.7 Water Safety Scotland published Scotland's Drowning Prevention Strategy 2018 – 2026 with the aim of bringing together individuals and organisations to develop water safety initiatives. This includes a reduction in accidental drowning deaths in Scotland by 50% by 2026 and reduce risk among the highest risk populations, groups and communities. Its aim is also to contribute to the reduction of water-related suicide.

1.8 This Strategy calls on the 32 Local Authorities to develop and promote water safety policies. Local authorities that do not currently have a policy should aim to have one by 2026 (in line with RoSPA recommendation and Scotland's Drowning Prevention Strategy).

1.9 In Highland, this Water Safety Policy has two strands.

- Establish a Water Safety Group
- Manage the water safety risk for bodies of water within its ownership.

1.10 A Water Safety Group for Highland has been established to consider the issues arising around water safety. This Water Safety Group would look to include: -

- RNLI
- SFRS
- High Life Highland
- NHS
- Police Scotland
- Nature Scotland (SNH)
- Scottish Water
- Scottish Canals
- RoSPA
- MCA
- Scottish Ambulance Service

This list is not exhaustive or prescriptive and others may join as and when deemed necessary.

1.11 This Water Safety Policy formalises Highland Council's approach to water safety management for its own land ownership. However, it should be noted that confirming ownership of land is problematic so an ongoing risk-based approach of known hot spots is seen as a pragmatic and feasible step. This will ensure that effective, efficient, and sustainable water safety management is applied in a proportionate manner.

1.12 In addition to this, Highland Council's approach to water safety within its own land ownership is on the basis that people are responsible for their actions and safety where hazards are obvious. The Highland Council will take measures to protect the public where indicated by the risk assessment process (RAP) and where hazards are not obvious and/or where there is an increased chance of entry to deep and/or fast water from an adjacent public facility such as a constructed path or viewing area. This may include the provision of barriers, water safety signs (WSS) and public rescue equipment (PRE), as appropriate.

1.13 The Highland Council will ensure that identified sites have recorded risk assessments

2. Legislation and guidance

2.1 Both inland and coastal waters are impacted by Scots common law, statutory requirements and guidance.

2.2 Under common law, “duty of care” applies to members of the public and to site operators (this falls to the local authority if they own the body of water) This means that a certain level of risk is acceptable but that safety measures should be applied where reasonably expected. It is the responsibility of the site operator to assess these risks

2.3 The relevant statutory requirements and guidance are as follows:

2.4 **Scotland’s Drowning Prevention Strategy**, was launched in 2018 by Water Safety Scotland and supported by the Scottish Government. This policy aims to reduce drowning in Scotland. (See 1.7)

2.5 **The Flood Risk Management (Scotland) Act 2009** looks to reduce flood risk in Scotland by supporting the Scottish Environment Protection Agency (SEPA), local authorities, Scottish Water and the public to fulfil their flood risk management responsibilities.

2.6 **The Occupiers Liability (Scotland) Act 1960** formally establishes that all landowners have a duty of care to take reasonable steps to safeguard those on their land. This Water Safety Policy aligns with that duty.

2.7 **Land Reform (Scotland) Act 2003** enacts Highland Council with a duty to uphold the right of responsible access to most land and water. This Act and accompanying guidance place the responsibility for personal safety largely on the individual.

2.8 **The Nature Conservation (Scotland) Act 2004** places a duty on Highland Council to further the conservation of biodiversity which implies that water environments should be managed for wildlife as well as for public benefit.

2.9 **The Civic Government (Scotland) Act 1982** allows Highland Council to provide signage and rescue equipment at locations it considers appropriate.

2.10 **The Dock Regulations 1986** legislates for access, transport by water, rescue, lifesaving and fire-fighting equipment and means of escape

2.11 **The Health and Safety at Work Act 1974** places a duty on The Highland Council to ensure that employees and members of the public are not

exposed to risks to their health and safety, so far is reasonably practicable.

2.12 **The Management of Health and Safety at Work Regulations 1999** places a duty on employers to carry out risk assessments where significant risk is identified and put in place suitable and sufficient control measures

2.13 **Managing Safety at Inland Waters** is information provided by RoSPA. As part of their guiding principles, they advise that everyone involved in water related activity has some responsibility for ensuring their own safety, including complying with best practise set down by governing sports bodies.

2.14 **The Scottish Outdoor Access Code** has a section on rivers, lochs and reservoirs which covers responsible behaviour by the public and landowners.

3. The Highland Council Responsibilities

3.1 Chief Executive

- Promote and provide resources to implement the Water Safety Policy

3.2 Performance and Governance

- Develop a Communications Plan.
- Provide guidance and controls over licensing of events.

3.3 Communities and Place

- Responsibility for the boating ponds when not contracted out to a third party operators.

3.4 Infrastructure, Environment and Economy

- Manage and risk assess the design and construction of new bodies of water
- Ensure commissioned artwork in/over/at water is subjected to suitable and sufficient risk assessment
- Implement the duties of the 2009 Flood Act including flood alleviation work
- Undertake post flood analysis and mitigation/potentially mitigation measures.
- Working with SEPA and Scottish Government to identify flood risk areas and also undertake targeted flood studies to determine potential flood alleviation measures
- Flood schemes –responsible for inspections and maintenance into the future.
- Manage and risk assess sustainable drainage ponds within The Highland Council ownership/liability

- Manage and risk assess harbour areas within The Highland Council ownership/liability

3.5 **Property and Housing**

- Link in with Infrastructure, Environment and Economy if involved the design and construction of new bodies of water. Manage and risk assess

3.6 **Education and Learning**

- Promote learning to swim and water safety education initiatives within schools as part of health and wellbeing.
- Risk assess excursions and activities as required by Guidance jointly issued by Highland Council and High Life Highland
- Manage water areas on site

3.7 **Resources and Finance**

- Training Highland Council staff in risk assessment and health and safety guidance
- Training Highland Council staff in mental wellbeing and suicide prevention training. A Mental Health and Wellbeing (MHW) Toolkit is available on Highland Council Staff Intranet.

4. Risk Assessment Process (RAP)

4.1 The Highland Council will:

- Ensure a structured risk-based approach is adopted by Services to identify hazards and implement practical and reasonable control
- Ensure officers responsible for undertaking the RAP of waterbodies follow the approved RAP guidance and have completed the Council's general risk assessment training.
- Carry out a RAP every 4 years for all sites where no significant change of conditions, or water safety incidents have occurred.
- Carry out a RAP for any site where a significant change of condition has occurred, within 1 month of the recorded change.
- Carry out a RAP for any site where a water safety incident has been reported, within 5 working days of the report being received. guidance when applying for a permit.

4.2 Risk assessments shall be carried out in accordance with Appendix 1.

However, anyone who is near, in or around open water bodies has a responsibility for ensuring their own safety. Individual risk assessments need to be linked to this Policy.

5. Water safety signage (WSS)

5.1 The Highland Council will:

- Place WSS at locations indicated by the RAP.

6. Public rescue equipment (PRE)

6.1 The Highland Council will:

- Place PRE at locations indicated by the RAP.

6.2 The PRE inspection frequency adheres to RoSPA guidance which advises that PRE should be checked weekly at well-used locations in the summer and less often during the rest of the year. Consideration of location and an alternative safety method where PRE requires regular replacement also adheres to RoSPA guidance.

6.3 PRE are only provided where there are known and recurring instances of deliberate entry to water and where it can be used effectively and inspected and maintained.

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7. Monitoring and Review

7.1 This policy will be monitored by the Water Safety Group and reviewed periodically or more frequently if legislation demands, or other issues arise.

Appendix 1

Guidance for the Risk Assessment Procedure for Water Safety

1. Introduction

This guidance provides a working practice for officers involved with the risk assessment of public spaces in relation to open water.

Risk Assessment is not just the responsibility of the designated officer who carries out the risk assessment of sites and identifies the most appropriate water safety provision: it also involves all those who have roles with inspecting sites or public rescue equipment (PRE), organising events on sites, redesigning public spaces or replacing and maintaining infrastructure.

Risk assessments should be carried out in line with the Council's Guidance on Risk Assessment.

Within countryside areas the public are expected to be more aware of risk and accept responsibility for their own safety to a greater extent.

All projects should be risk assessed in terms of health and safety. Risks should be assessed as part of the design process and monitored throughout the life of the project. This will avoid new risks being introduced.

Thereafter, the assessment should be reviewed and recorded every four years, unless:

- an incident occurs: RAP to be carried out for the appropriate site within 5 working days of a report being received.
- site conditions change: RAP to be carried out for the appropriate site within 1 month of the recorded change.

An operational risk assessment should be reviewed prior to the site going live.

2. Responsibilities in relation to water safety

Risk assessments for design of new waterbodies shall be the responsibility of the project manager. There would also be a documented handover process to the lead Service.

Operational risk assessments at handover and routine risk assessments shall be the responsibility of the service 'owner'.

3. The Risk Assessment Process

Actions identified to reduce risk
(controls) must be identified within the context of the wider site character and its amenity value. Seasonal variations and access for emergency responders in case of an incident must be considered.

Prevention of drowning – the main factors recognised as contributing to accidental drowning are:

- ignorance, disregard, or misjudgment of danger
- unrestricted access to hazard
- absence of adequate supervision
- inability of the person to save themselves or be rescued

In addition, it is known that some people who enter the water deliberately due to extreme emotional distress or attempted suicide, want to be rescued and respond to rescue attempts.

The risk assessment can only partly address the above: off-site education regarding the risks of swimming or entering the water contributes to the first point, although on-site signage may be appropriate where risks are not obvious, or there is a known site issue.

The risk assessment aims to:

- assess the level and type of risk in relation to potential hazards
- identify how to reduce the level of risk where appropriate
- ensure actions (controls) are put in place within a reasonable timescale
- check controls are satisfactory

In relation to water safety, particular considerations apply which include:

- the nature of the water - depth, flow rate or current, temperature and quality and the extent to which this can be seen from the bank.
- the nature of the water's edge - proximity of deep water to the edge, the size of any drop from edge to the water, gradient of the bank, the accessibility to water from the edge, whether the edge may be slippery or likely to lead to slips, trips or falls.
- other activities - numbers and ages of people likely to be near the water, whether people may be under the influence of alcohol or emotionally unstable.
- water based activity – water sports especially swimming.

Controls may include:

- designing paths, play areas away from water's edge
- ensuring surfaces adjacent to the water's edge are secure (slips, trips, falls unlikely)
- creating man-made barriers (fences)
- managing vegetation to ensure the water's edge is obvious (pruning and/or mown grass borders)

- creating vegetated barriers to dissuade access to the water's edge
- warning the public of hazards (on site WSS)
- providing public rescue equipment (PRE)

The risk assessment must take all relevant site characteristics into account to identify the level of risk and appropriate control, including, but not limited to:

3.1 Nature of the water

Deep and/or moving water is generally more hazardous than shallower or still water. While a river in flood is an obvious hazard, during low water summer conditions it may appear relatively low risk to the public, however hazards are likely to include very cold water, uneven riverbed with deeper pools and strong localised currents. These water conditions may not be apparent from the bank and anyone entering the water to swim or wade, even if a competent swimmer, may experience cold body shock, or be swept away in strong currents and be unable to reach safety. For this reason, water safety signs should be considered where there have been recurring instances of people entering the water.

In ponds, algal blooms may develop at certain times of year and temporary warning signs may be appropriate to warn people to keep their dogs out of the water. In practice warning signs are only placed at ponds where there is no water movement if an algal bloom is reported.

Ice may form at certain times and temporary warning sign' may be appropriate.

3.2 The nature and accessibility of the water's edge

Where there is a steep (1:1 or steeper) or slippery slope, or the drop to the water's edge is high, there is likely to be an increased risk for someone slipping or falling into the water. Furthermore, anyone entering the water may be unable to climb back out. More gentle gradients reduce the risk of anyone falling in but natural water edges (riverbanks, .) are likely to be uneven and slippery in wet or cold weather and slips, trips or falls may occur. Controls such as separation with fences where there are sheer or steep drops, and establishment of long, uncut vegetation margins to dissuade access for lower gradients are likely to be required. Where edges are constructed (viewing platforms, pond borders, path surfaces) edges must be secure and obvious to minimise slips or trips. Water safety signs may also be required where there is deep/fast water adjacent to a public facility (path or play area). These may be located at main site entrances, and additionally at the water's edge where a particularly hazardous area exists.

3.3 Adjacent activities

The numbers and types of people (ages, abilities) and the nature of the waterside attraction should be considered. If, for example a popular path, play area or pub is close to the water, controls including barriers, particularly in urban areas, may be required. Mental health issues can lead to distressed people jumping into water as a

‘cry for help’, they may want to be rescued so provision of public rescue equipment where there are known issues is valid.

3.4 Water based activities

Swimming in, or jumping into (tombstoning), deep and/ or fast flowing water is high risk and should be discouraged, particularly where there are known hot spots. Water safety may be required in these situations. Ice on water is an obvious hazard, however on Council ponds, if there are known incidences of people venturing onto the ice, temporary warning signs are appropriate. Those using public slipways for organised water sports are responsible for their own safety, but water safety signs and public rescue equipment is also required (and provided) at slipways.

N.B. Organised events taking place on Council land must have event risk assessments which should be checked as appropriate.

4. Water safety control considerations

4.1 Edge protection

(Section 7.1 provides detailed guidance on appropriate controls based on site characteristics).

The design of public areas aims to increase public amenity while considering water safety. Paths, play areas, and other features attracting people should be routed or located away from the water’s edge. Play areas should be at least 6m away from the edge and paths should be at least 2m from the edge. Where viewing platforms or other constructed edges facilitate direct access to the water’s edge secure edges and /or barriers may be required to reduce the risk of slips, trips and falls. Where paths are unsurfaced and are near to steep drops into water, particularly in countryside sites, localised path surfacing improvements may be appropriate to reduce the risk of slips as well as barriers include railings, fencings and walls. Where new barriers are required, these should be appropriate to the site conditions (see table 7.1 for further guidance).

The management of vegetation at and near the water’s edge is crucial to providing for water safety and can either facilitate or dissuade access to the water’s edge.

Where direct access to the water’s edge is considered integral to public amenity. vegetation should be maintained to ensure the edge and water is obvious. This is appropriate where there are shallow gradients and still, shallow water, and where there is a relatively small area at the water’s edge, usually at ponds. Pruning and remove trees or shrubs which may obscure the edge and maintenance of a wide mown grass edge is required.

Where access to the water’s edge is not considered essential and/or an extensive natural water’s edge exists, vegetation can be managed to create a wide margin of long growth (grass/weeds/shrubs) along the water’s edge which dissuades people

from access. Biannual cutting in autumn is required to maintain views over the water especially where there are viewing areas and seating.

Within ponds planting within the water is likely to discourage paddling or swimming and encourage wildlife.

Note that in some circumstances (as indicated below) WSS and/or PRE in addition to barriers may be required.

4.2 Water Safety Signage (WSS)
WSS may be placed in by bodies of water, including countryside sites.

All WSS must be located to be highly visible to site users. Where required and possible, locate WSS at main site access points. Where existing threshold signs exist, WSS signs should be located alongside them. Where there are no obvious site access points, WSS can be located at the water's edge, ideally at viewpoints or other key obvious locations. Additional WSS at the water's edge can be used to reinforce those at main access points if required due to the presence of deep/fast water immediately adjacent to a public facility (play area, path), or an area where there is a known and recurring entry to the water. A minimum number of signs should be used, and they should be fixed to existing posts or structures to avoid unsightly clutter.

4.3 Public Rescue Equipment (PRE)
PRE comes as throw lines or lifebelts and both are difficult to use effectively and may distract witnesses from the need to contact emergency services immediately, which must be their first priority. As such, PRE must only be placed at slipways and where there is a known recurring issue with people entering the water. PRE must be located to be highly visible, where it can be used effectively, can be inspected easily and, ideally where it is overlooked by nearby properties so that it will be less prone to tampering. In most cases this will be next to the water's edge. If PRE is repeatedly vandalised this may be removed and replaced with WSS.

Throw lines are the most common PRE and are designed to be thrown from water level over a distance (up to 25 m line provided) across the water. Lifebelts can only effectively be dropped from a height or thrown a short distance. there are no instances of people entering the water, the PRE should be relocated.

PRE should be accompanied by WSS (within the site). Where PRE and WSS are both located at the waterside, WSS and PRE should be mounted on the same pole, or other fixing, to be most effective and minimise clutter.

5. Site and PRE-Inspections

Site and PRE monitoring inspections are carried out by those who are on site most frequently to carry out for a variety of site management functions. Site inspections and PRE inspections are carried out by the Service owner.

Most Council sites involving water safety considerations should be inspected on a six-monthly basis. Faults are recorded as well as any necessary work schedule to remedy faults such as repairs to barriers or path surfacing is created. In all cases priority should be given to these safety actions.

Checks required and possible actions arising from site inspections:

- Barriers, edges and surfaces - check to ensure they remain structurally sound. Create work programme to remedy any issues, place temporary notice/barrier to restrict access if required.
- Path surfaces – check for slip hazards where there are steep drops next to the path. Create work programme or volunteer task to remedy any issues.
- Signs - dirty or obscured by vegetation. Clean/clear as required.
- PRE - missing or faulty require to be replaced.
- Any significant natural changes to the site relevant to water safety need to be reported to the officer responsible for the site RAP (includes erosion of water's edge, obvious desire lines leading to water's edge).

Spare PRE should be maintained so that any damaged or missing PRE can be immediately replaced. A record of inspections must be kept and include locations and dates of all repairs and replacements of PRE.

Checks required with possible actions arising from PRE checking:

- Check all PRE casing with lid is in place with markings to standard.
- Check all PRE contents of casings are in place – throwlines and life belts.
- Replace any missing of faulty PRE.

6. Risk Assessment Responsibilities

The officer who carries out the risk assessment is responsible for the RAP for the site so needs to be kept informed of any changes to site conditions and any problems with PRE. Appropriate decisions regarding how best to provide for water safety on Council sites can only be made with knowledge of all relevant information.

Key decisions will include:

- Where a significant change to the site has been noted – reassess the site within 1 month and change site controls if required.
- Where a water safety incident has been reported – reassess the site within 5 working days and change site controls if required.

- Where a PRE is repeatedly vandalised or stolen – consider removing and replacing with a sign or other control measure.

6.1 Keeping records

- Design issues of new infrastructure should be held within the health and safety File.
- Safety RAP information will be maintained and available to all relevant officers. This will include:
- Site risk assessments – clearly labelled with site and date assessed. Should include map-based location of all barriers, WSS and PRE and photo records of same.
    - All relevant information from site inspections will be stored.
    - Periods for temporary signs will be recorded.

It is important to monitor the effectiveness of controls and revise them in the light of issues raised or reported incidents. This information will usually be provided through scheduled site inspections or public reporting.

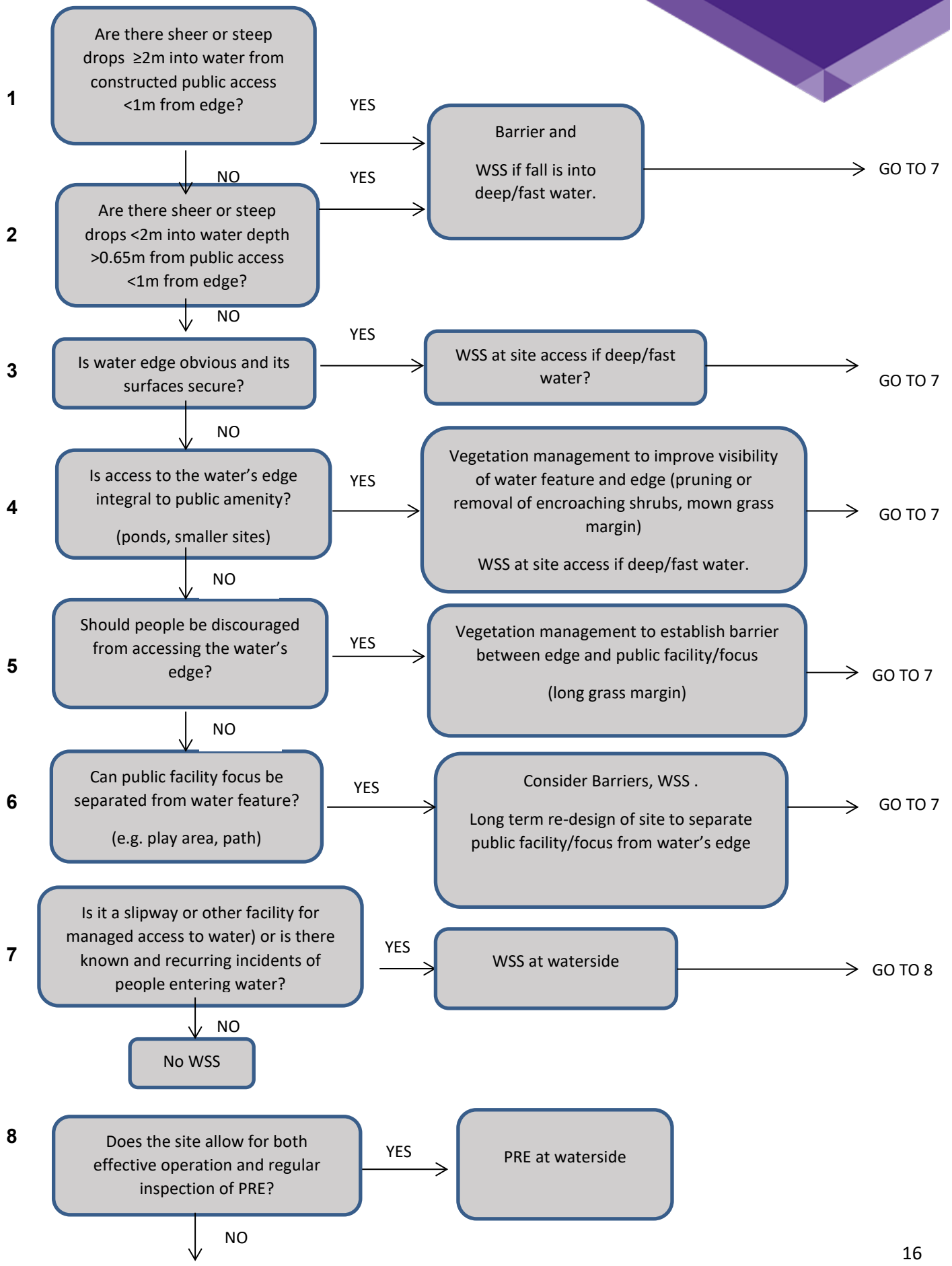
7. Guidance based on Site Characteristics

This section provides flow diagrams with accompanying tables to help the risk assessor identify the most appropriate way to reduce the level of risk in relation to water safety based on the characteristics of the site. The proximity of the public facility such as a play area or path to the water's edge is the main consideration. The boxes on the flow charts which help characterise the site are numbered and correspond to the reference number on the accompanying table.

Fig 7.1 Guide to Appropriate RAP Controls based on Site Characteristics (diagram and accompanying table). The diagram provides a quick check of critical features at the water's edge in relation to public facilities and shows the control indicated. The table explains the site characteristics with examples and the appropriate controls.

Fig 7.2 Guide to Appropriate Locations for WSS and PRE (diagram and accompanying table). The diagram provides a quick check of site characteristics to indicate where to place any WSS and PRE which is indicated for the site. The table provides further information.

7.1 Guide to Appropriate Risk Assessment Controls based on Site Characteristics



No PRE

7.2 Guide to Appropriate RAP Controls based on Site Characteristics

This table provides further information on the flow diagram which identifies the appropriate controls based on site characteristics. The table provides detail on the circumstances where each control is most appropriate and includes examples of sites where each control response has been applied. References to RoSPA guidance can be found at https://www.flipsnack.com/rospacatalogue/rospa-managing-safety-at-inland-waters.html

Ref	Site characteristics and examples	Appropriate RAP control response	Policy and justification, with reference to key RoSPA guidance and previous practice.
1	Sheer and very steep (60 degrees or more) potential falls into water from a height of 2m or greater. Constructed Features which promote access to the water edge such as viewing platforms and paths which are adjacent (<1m distance) to the edge. Informal rural paths. In rural locations due consideration should be given to the character of the site and that it reasonable for the public anticipate a lesser measure of control and a greater level of informality within rural areas. Here the WSS signs at site entrances are considered important to promote public awareness, care and responsibility)	**Surfacing and edges:** Constructed waterside surfaces and edging should be secure with no trips It is appropriate to differentiate between formal settings within towns and villages and informal countryside paths. Here the nature of the site and terrain is likely to result in a degree of uneven surfaces and informal stone steps (without consistent risers). **Barriers:** **Protective Barriers** (normally a rigid construction of timber or metal) To be provided to prevent falls into water of 2m or greater from constructed access features such as viewpoints. Barriers should be attractive and/or discreet and in character with the location, robust and low maintenance. Note that they often double up as 'leaning' points for people to appreciate the landscape and view. Walls should be designed to discourage sitting on them, or walking along them **Fence** (usually post and wire) Where the potential fall into water is from an informal rural path a simple post and wire fence may be sufficient to stop people getting too near the edge. In some situations, barriers may not be required depending on site conditions.	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. Or there should be fencing/barriers to deter/prevent access to water. Where the risk is high, fencing can be used, however it should be noted that this is an expensive option which needs careful consideration. The Council will continue to consider installing new barriers in relation to water safety only in circumstances indicated by the risk assessment where there is a sheer or steep drop (60 degrees or more) into water from an adjacent (within 1m) public facility. Designs which are appropriate to the risk and site character and are low maintenance will be used. Appropriately designed barriers are generally in place where there are sheer drops from viewing areas, bridges and pathways. Barriers are frequently in place where there are very steep drops near to pathways.

	.	In rural locations it is appropriate to consider the terrain and potential barriers / fencing together. For example, an unavoidably steep and winding section of path, possibly also with informal steps, located within 1 m of the path edge at height (>2m) into deep or fast flowing water, is more likely to require a fence or barrier. In countryside sites fewer barriers are provided where there are steep drops near to paths localised path improvements may be more appropriate such as improved drainage to minimise erosion and/or informal steps. It is also appropriate to consider other functions of a fence or barrier such as providing an informal handrail to aid access for the less mobile or leaning point if there is a viewpoint. NB Existing barriers have been installed in accordance with water safety considerations and should be sufficient. **Water Safety signage (WSS):** To be provided only as part of welcome site signage at main access points. May be provided at focal points such as viewpoints where there are many accesses or where the risk is significant. All signs must adhere to the approved format and locations (see 4.4 and 7.2) Please also see 7 below. **Public rescue equipment (PRE):** Not usually required on the basis that the barrier minimises accidental entry to water. Please also see 8 below.	This guidance provides both a gradient of steepness and a distance from a public facility such as a path to increase consistency. (See 7 and 8 below for Policies relating to placement of WSS and PRE)

		Note also in relation to WSS and PRE: Constructed public facilities can be a focal point for the site (e.g., viewing platforms) so may be the best available location for any WSS or PRE indicated for the wider site.	
2	As above in 1 but with sheer or steep drops of less than 2m into water of a depth of 0.65m or more and/or is fast flowing from a constructed public facility such as viewing platform or footway/path.	The appropriate risk assessment response is as in **1 above**, the only exception is in the consideration of potential protective barriers or fence as described in the situations above, which would only be appropriate here where the edge is not obvious and where the water depth is 0.65m or above and/or is fast flowing. Note that rain can substantially increase the depth of the water to more than 0.65m and increase the flow speed.	as 1 above
3	The water's edge is obvious, and its surfaces are secure. Water edges are obvious and can be easily seen from the wider area (3m). There are no hidden dangers at the water's edge and accidental falls into water are unlikely.	**Surfacing and edges:** Where the surfacing at the edge is constructed to prevent slips and trips. **Design of ponds:** Where ponds are constructed, or redesigned edges must be secure and/or have gentle gradients. Water depth should be shallow at the edge and should not exceed 0.65ms so that anyone accidentally entering the water can easily stand up and climb out. Planting and growth of appropriate water plants	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. Shallow water (less than 0.66m) should extend a minimum of 2m from the water edge with a 1:3 gradient. With depths from 0.65 -1.36m a margin of 1.75m should be maintained from edge with gradient of 1:2.5. Planting as an alternative to grading where a steep gradient or

	Usually designed pond areas with managed edges.	should be encouraged to discourage access and encourage biodiversity. **Water Safety signage (WSS):** Not usually required at ponds. To be provided where there is deep and/or fast flowing water adjacent to a public facility usually only as part of welcome site signage at main access points. Please also see 7 below. Temporary signage may be required to warn of toxic water such as blue green algae, or ice. This will only occur in ponds where there is low or no water flow. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	shallow gradient (swimming temptation) exists, the planting of vegetation can act as a deterrent. The Council will: • Continue to ensure water safety is a key consideration in relation to design of ponds and other water features. Ponds will have secure edges with gentle gradients. Water will be shallow (0.65m or less), particularly at edges and water plants will be established to dissuade entry to the water and encourage biodiversity. • Continue to place temporary signs when required at pond locations where there is no water flow to warn people of the risk of toxic water and ice.
4	Access to water's edge is considered integral to public amenity and is possible over a restricted area. Water edges and/or water feature may not be obvious from the public facility focus and wider area (3m). There may be hidden dangers at the edge, so trips and slips may be possible. Includes ponds in naturalised environments and some areas	**Surfacing and edges:** Where the surfacing at the edge is constructed, this must be secure with no trips. A gentle gradient into the water is preferable although not always possible. **Vegetation management:** If there is any hidden danger from the water feature and/or its edges being not obvious consider whether a different maintenance objective and/or a re-design of the area can remedy this (see options 4, 5 and 6). In sites where access to the water's edge is facilitated within a small area as an integral feature for public amenity the	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. Where access to the water's edge is considered integral to the amenity of the site, the Council will continue to manage water edge vegetation to ensure the edge is obvious, for example at ponds. This can be achieved by pruning or removal of obscuring trees or shrubs and/or the maintenance of a wide mown grass border.

	of natural water edges (river/loch banks). Examples of sites where this management has been applied:	vegetation should be managed to ensure the edge and water feature is obvious and minimise the risk of accidental entry to water. This may be achieved through pruning or removal of obscuring trees or shrubs and/or maintaining a wide (3m or more) short mown grass margin around the water feature. This would include natural shallow beach areas. **Water Safety signage (WSS):** To be provided where there is deep and/or fast flowing water adjacent to a public facility usually only as part of welcome site signage at main access points. Please also see 7 below. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	

5	People should be dissuaded from accessing the water' edge. Water edges and/or water feature may not be obvious from the public facility focus and wider area (3m). There may be hidden dangers at the edge, so trips and slips may be possible. Access to the water's edge is not provided as integral to public amenity. A river or loch contributes to the amenity and enjoyment of a site but may be appreciated from a greater distance; and people should be dissuaded from accessing the water's edge. Access to the water's edge is therefore not encouraged or formalised (although the water feature remains a key feature for public amenity within the site). Usually natural riverbanks.	**Vegetation management:** The public should be discouraged from accessing the water's edge through the establishment and maintenance of a wide (3m or more) vegetated barrier of long grass/weeds and shrubs along the water's edge. Views should be maintained, particularly from seats and other viewpoints, through the periodic pruning or removal of large trees and shrubs. **Water Safety signage (WSS):** To be provided where there is deep and/or fast flowing water adjacent to a public facility usually only as part of welcome site signage at main access points. May also be required at waterside locations if evidence shows that people are taking regular access to particular places where there is deep or fast water close to the edge. Please also see 7 below. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	**RoSPA key guidance:** The water edge should be secure and obvious with a gentle gradient. Or there should be a vegetative barrier to deter access to the water's edge. The Council will, where access to the water's edge is not considered integral to the amenity of the site, continue to manage water edge vegetation to discourage access, for example to separate a path from a natural riverbank. This can be achieved by the maintenance of a wide uncut margin of natural vegetation between the public facility and the water's edge (See 7 for appropriate locations of WSS and PRE)

6	Where space allows the public facility focus (play area, path) should be moved away from the edge of any deep or fast flowing water. Edges to deep or fast flowing water and may not be obvious from the public facility focus and wider area (3m). There may be hidden dangers at the edge, so trips and slips may be possible.	**Redesign**: Where there is a public facility attraction such as a play area or path close to the water's edge (where there is deep/fast water) and where there is adequate space to move the public facility such as a play area or path further from the water this should be considered as a long-term option. Play areas should be at least 6 m and paths should be at least 2m from the water's edge. Play areas should be placed as far from the water's edge as possible, being at least 6m away from the edge. Access to the edge is discouraged by establishing long vegetated margins along the riverbank. **Barriers:** To be provided where safe distances can't be met. **Water Safety signage (WSS):** To be provided where there is deep or fast flowing water adjacent to the edge from a public facility as part of welcome site signage at main access points, and at the water's edge (until redesign only). Please also see 7 below. **Public rescue equipment (PRE):** Not required. Please also see 8 below.	**RoSPA key guidance:** Pathways should be designed away from the water edge to create a distance of vegetation. Where a high risk is identified the path can lead visitors away from the water. The Council will continue to ensure design of public places, and in particular play areas, which are near to water bodies take water safety considerations into account. Where play areas and/or paths are located near deep and/or fast water a minimum separation margin, of 6m for play areas and 2m for paths, from the water's edge will be ensured.
7	Slipways, harbours and other facilities for managed access to water. Areas where there are known and recurring incidences of people entering deep or fast	**Water Safety signage (WSS):** To be provided. **Public rescue equipment (PRE):** To be provided at slipways. Please also see 8 below.	**RoSPA key guidance:** Signage is particularly important to improve awareness of danger and hazards. All signage should be located as guided by the risk assessment and designed, placed and maintained to be highly visible. WSS should be

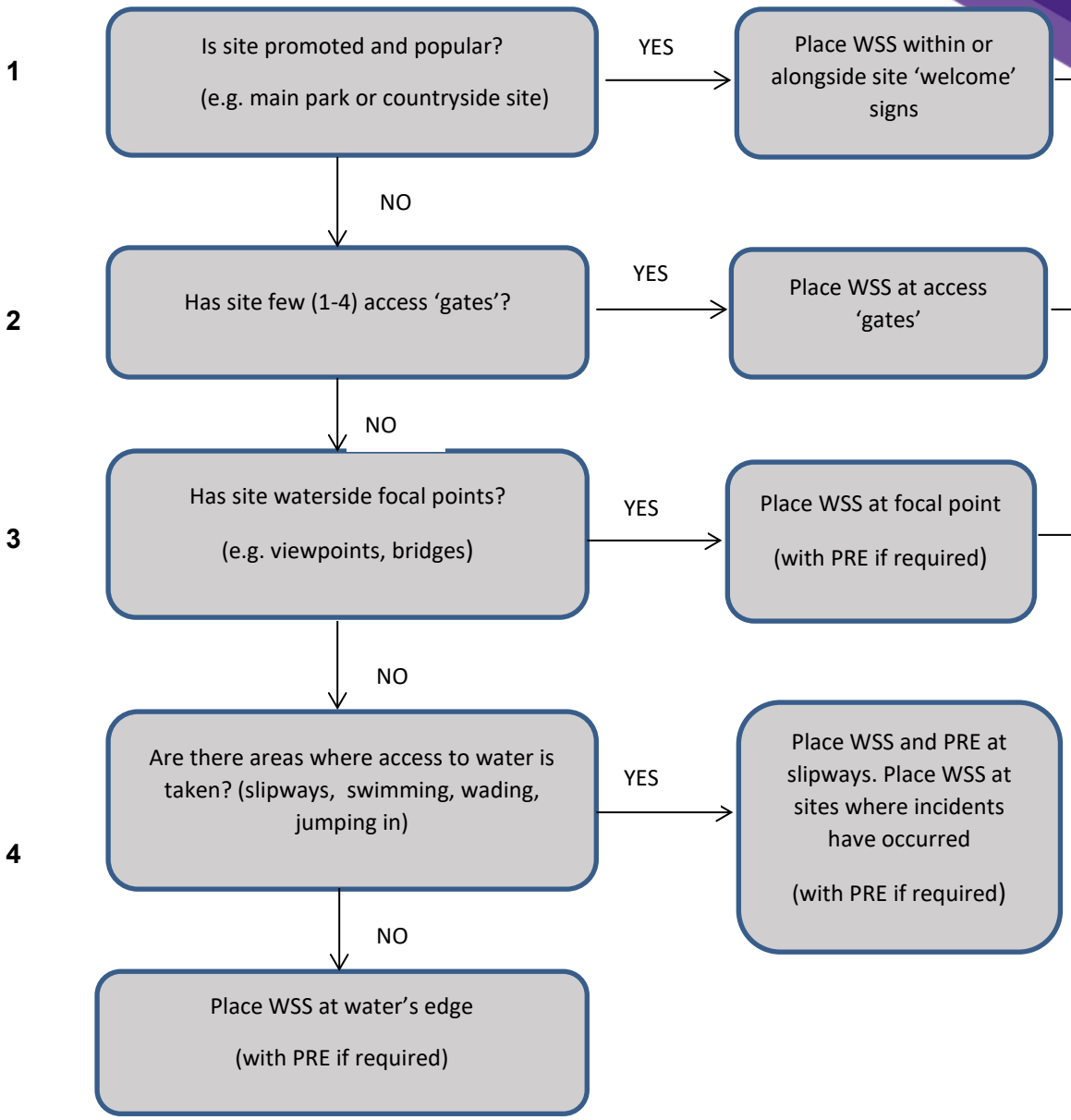
	flowing water for recreation or for self-harm.	For appropriate location of WSS and PRE see diagram 2 and table 2.	placed with all (PRE). WSS should include emergency contact details and request that any incidents or faults should be reported to the Council.
			
			Local water sports bodies have responsibility for their own activities. Site owners still have responsibility to ensure basic health and safety standards are attained.
			
			The Council within its ownership will:
			• continue to place WSS in locations indicated by the risk assessment, being:
			  ○ at slipways (facilities for managed access to water)
			  ○ where deep and/or fast flowing water is adjacent to a public facility
			  ○ where there are known and recurring incidents of entry to water
			• now consider removing signage at locations where the hazard is obvious and the risk is low, for example at ponds.

8	Sites where both effective operation and regular inspection of PRE is possible and where PRE is otherwise indicated.	**Public rescue equipment (PRE):** The Council within its ownership may provide PRE where it can be both used effectively and inspected on a regular basis and where there are known and recurring incidents of deliberate entry to water.	**RoSPA key guidance:** PRE is only useful as part of a drowning prevention strategy and is not a key risk control measure itself. The provision of PRE will need to be identified through the risk assessment and location will reflect points of access.

		PRE should be provided only where it is likely to reach a conscious casualty so will **not** be provided where:
		• high falls are likely to be fatal and rescuers are likely to put themselves in danger to operate PRE (e.g., countryside gorges)
		• fast flowing water will carry casualty rapidly out of range of PRE
		• regular (weekly) inspections of PRE is not practical due to remote location.
		
		If PRE is repeatedly vandalised making effective operation impossible, first consider an alternative location for the PRE where it is overlooked so will be less liable to vandalism. If this is not a feasible option replace the PRE with WSS and consider whether any further actions are required in relation to the particular site-specific circumstances.
			Lifebelts are designed to be dropped into water from a steep bank.
			Throw lines are designed to be thrown on the same level e.g., from a riverbank.
			PRE should be checked, and results recorded weekly at well used locations in summer.
			If PRE needs regular replacement due to vandalism, location and alternative safety method should be considered.
			
			The Council within its ownership will:
			• continue to place PRE at locations as informed by risk assessment, where:
			  ○ there are known and recurring instances of deliberate entry to water
			  ○ they are highly visible
			  ○ they can be used effectively
			  ○ they can be regularly inspected and maintained
			• continue to ensure all PRE is clearly marked with instructions on use and that WSS is provided nearby.
			• remove PRE which is repeatedly vandalised and consider relocation or replacement with WSS.
			• consider removal or relocation of existing PRE within sites with multiple PRE to ensure the most effective and sustainable placement of PRE.

			• inspect all Council PRE on amenity sites once a week between April and October and monthly between November and March, record any defects and replace with functional PRE within 2 working days.

7.3 Guide to Appropriate Locations for Water Safety Signs (WSS) and Public Rescue Equipment (PRE) (see table 7.2)



Number and location of WSS and PRE:

Should be located to be highly visible. In most circumstances a few well-placed WSS or PRE should be adequate per site.

WSS should be located at main access points where possible. Where incidents of entry to the water are known additional WSS may also be appropriate at these locations. Where no obvious entry point can be identified the most visible waterside location should be used.

PRE should always be accompanied by WSS within the site. Where both WSS and PRE are located at the water' edge these should be mounted on the same pole. PRE should always be located at the water's edge either at focal points, or at the most visible location at, or close to, areas used for access to water.

Table 7.2 Guide to Appropriate Locations for Water Safety Signs (WSS) and Public Rescue Equipment (PRE)

This table provides further information on the flow diagram which identifies the appropriate locations for WSS, and PRE based on site characteristics. Diagram 1 and Table 1 clarifies where WSS and PRE are indicated.

1	Is the site promoted and popular? For example, a main park or countryside site.	WSS should be positioned at main site accesses to ensure that most site users see it. Where threshold (welcome) signs exist WSS should be positioned beside these signs. Where new threshold signs are planned WSS should be incorporated into this signage with appropriate site-specific advice. In all cases WSS should comply with the National Water Safety Signage Standard. Please also see 4 below.	RoSPA key guidance: Signage is particularly important to improve awareness of danger and hazards. All signage should be located as guided by the risk assessment and designed, placed and maintained to be highly visible. WSS should be placed with all (PRE). Three types of signs should be considered being: 1. Access signs – map at site entrance to explain risks and features of site, location of PRE and what to do in an emergency. 2. Sign at key locations – at risk area highly visible to warn of specific risk what to do in an emergency 3. Nag signs – smaller to repeat key message. Council Policies: The Council will place and maintain WSS to ensure they are highly visible to most site users. A minimum number of WSS will be used to maintain the wider public amenity value of the area and avoid clutter. WSS will be located at main site entrances where possible, or at site focal points, and/or by the waterside.
2	Has the site few (1-4) access 'gates'?	WSS should be positioned at main site accesses to ensure that most site users see it. Where a site has a low number of main accesses WSS can be positioned at each access.	
3	Has the site got waterside focal points? For example, viewpoints, bridges or slipways.	Where there are many or no specific accesses to a site it is more feasible to position WSS at any waterside focal point to ensure that most site users see it. Where a viewpoint or bridge is present these may provide good focal points. If PRE is required at the site position both WSS and PRE at the same waterside location and using the same mounting if possible.	
4	Are there areas where access to water is known to be taken?	Place WSS (with PRE if required) at the most obvious location by the waterside where access to the water is known to occur. Where indicated by the risk assessment, this may be in addition to WSS at the main site access.	
5	If none of the above apply	Place WSS at the water's edge in the most visible location available.	