



# Preventing exposure to COVID-19 Aquatic facilities

June 17, 2020

## Introduction:

As the global pandemic of COVID-19 persists, CUPE wants to ensure that employers and members continue to implement leading practices to prevent workplace exposure to the virus which causes COVID-19.

The guidance in this document is specific to addressing the hazard related to COVID-19. It is intended to assist CUPE health and safety activists in their efforts to ensure that adequate protections are in place for members. In the case of those workplaces that have suspended operations, the guidance is intended to assist in implementing effective controls prior to the resumption of normal operations.

The information linked below helps highlight some of hazards that increase the likelihood of exposure. Find CUPE's COVID-19 resources here:

- [General Occupational Guidelines for COVID-19](#)
- [COVID-19 Fact Sheet](#)
- [COVID-19 and the Right to Refuse Unsafe Work](#)
- [COVID-19 Cleaning and Disinfecting](#)
- [COVID-19 Personal Protective Equipment](#)
- [COVID-19 and the Use of Masks and Respirators](#)
- [COVID-19 Masks and Face Coverings](#)
- [Good Hygiene Practices and the Respiratory \(Cough\) Etiquette](#)

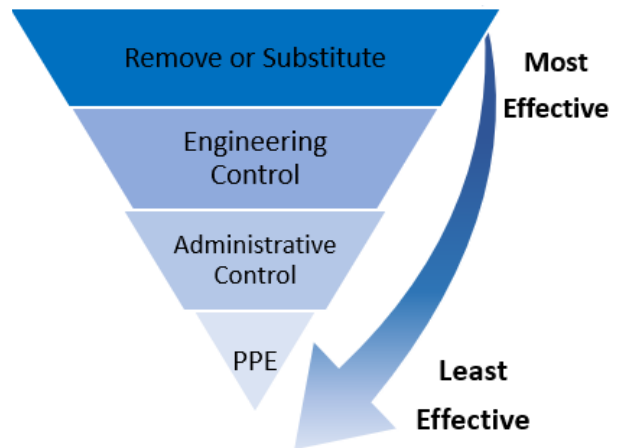
It remains vital that employers continue to work with their (joint) health and safety committee about the best way to control sector-specific hazards during this pandemic.

**This document provides specific guidance to CUPE members working at aquatic centers.**

**General guidance can be found [HERE](#) and should be reviewed in conjunction with this document and the specific sector documents which apply to your workplace which can be found [HERE](#).**

## Hierarchy of controls

*Occupational Health and Safety (OH&S) is concerned with identifying workplace hazards and implementing control measures that reduce the risk of hazards leading to illness or injury.* In the field of OH&S there is a concept called the “hierarchy of controls”. This is the broad category of controls that can be used to address hazards found in the workplace. They range from the strongest controls (eliminating the hazard) to the weakest controls (personal protective equipment PPE).



*Personal protective equipment (PPE) is not the most effective hazard control.* It is a last resort when the hazard cannot be adequately addressed using more effective controls “up” the hierarchy. Due to pervasive media coverage of PPE shortages across the world, and due to PPE’s vital role as one of many control measures that workplaces utilize, there is a common misconception that PPE is the best (or only) hazard control that can protect workers from COVID-19. This is a potentially dangerous assumption. It limits the discussion to, and consideration for, stronger control measures. CUPE members, locals and health and safety activists should be pushing for the best protections for their members.

When choosing controls, don’t forget other hazards and how they might be affected by new controls (for example, the hazard of working alone while practicing physical distancing and reduced number of people in the workplace or the PPE needed for cleaning). Also ensure that controls do not introduce new hazards into the workplace.

All the following sample hazard controls should be considered in addition to any other legislative and regulatory requirements such as policies and procedures for working alone, preventing violence, and so on.

Workers have a unique and important perspective in evaluating the effectiveness of controls proposed by the employer as they understand best how these tasks are performed in practice and what impediments there may be to implement administrative controls.

Remember: control of hazards related to COVID-19 are just one part of a much larger employer health and safety program. **All the following hazard controls must be continuously monitored, evaluated, updated and revised in conjunction with your Health and Safety Committee or representative.**

## Additional measure for aquatic facilities

The [general sector sheets](#) provide guidance on *screening, physical distancing, cleaning and other general controls including personal protective equipment*, and should be reviewed as part of an broad infection control program. The following are additional controls specific to aquatic workplaces:

### **Elimination**

Workplaces should be designed to remove hazards whenever possible. Aquatic workplaces have the benefit of robust infection prevention controls as part of regular operations that can help to destroy the virus.

United States Centres for Disease Control and Prevention has indicated that “proper operation, maintenance, and disinfection (with chlorine or bromine) of pools should kill COVID-19<sup>1</sup>.”

- Aquatic facility operators should ensure water testing takes place as required by regulation or more frequently if not adequate to ensure that chemicals are maintained at a level to neutralize COVID-19.
- Owner/operators should ensure their swimming pool water testing meets or exceeds regulation requirements.
- Lifesaving Society’s *Guide to Reopening Pools and Waterfronts* recommends the following:

	<b>Indoor/Outdoor</b>	<b>Outdoor Pool</b>	<b>Spa or Hot Tub</b>
Chlorine	1.0–3.0 mg/l	3.0–5.0 mg/l	5.0–8.0 mg/l
Bromine	2.5–4.0 mg/l	3.0–5.0 mg/l	5.0–8.0 mg/l

Additionally, the Lifesaving Society recommends the following minimum standards:

**pH:** Recommendation of a pH range of 7.4–7.6

**Total Alkalinity:** Recommendation of total alkalinity range of 90–120 mg/l

**Calcium Hardness:** Recommendation of calcium hardness range of 200–400 ppm

**Cyanuric Acid** Recommendation: Cyanuric Acid 25–40 ppm

Note: cyanuric acid is used in outdoor pools only and extends the life of chlorine and prevents ‘burn off’ from the effects of the sun.)

If perlite is used in your pool, contact product manufacture or maintenance to ensure best practices are in place.

### **Engineering controls**

This category of controls involves using barriers or separations to prevent employees from being exposed to hazards. Plexiglass barriers have become a common application during the

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<sup>1</sup> <https://www.cdc.gov/coronavirus/2019-ncov/daily-life-coping/visitors.html>

COVID-19 pandemic, installed at points of contact with clients, customers, contractors or other staff or when two metres (six feet) of distance cannot be maintained in all directions.

Wherever possible, it is better to create permanent or semi-permanent barriers before utilizing administrative controls or personal protective equipment. For example, many of us have become accustomed to seeing plexiglass barriers for cashiers at the grocery store that separates them from the customers.

For aquatic workplaces:

- Barriers should be set up for staff at entrances to ensure staff are separated from patrons.
- Where feasible, use physical barriers to ensure single direction movements coming in and out of change rooms or washroom.
- Use foot operated or open lid garbage cans.

## **Administrative Controls**

Administrative controls are workplace rules that control or alter the way the work is done. These may include things like the timing of work, policies and work practices such as standards and operating procedures.

In the aquatic workplace consider some of these additional administrative controls:

**Payment for services.** Every aquatic facility is different. Employers need to work with their workers to determine safe ways of accepting payments. Some options commonly being practiced in other sectors include canceled payments for the period of the pandemic, or people paying using non-cash methods (credit/debit card). Physical money should not be transferred between patrons and workers unless employer can develop a method for disinfection or a way to ensure the worker is protected.

### **Cleaning and disinfect of Specific equipment**

**Rescue equipment (rescue tube, rescue can, rescue pole, ring buoys).** Clean and disinfect rescue equipment at the end of the day or during a lifeguard rotation. Equipment should be immersed in chlorinated water during disinfection and stored to dry overnight.

**Training accessories and recreational toys and games and personal floatation devices.** Clean and disinfect training accessories etc. after use by a swimmer and daily after final cleaning. Equipment should be immersed in chlorinated water during disinfection and stored to dry overnight.

**Deck equipment.** Clean and disinfect all surfaces of deck equipment that are frequently

touched with hands at least daily, or whenever scheduled closures take place. Additional closures may be required for additional cleaning.

**Beach locations.** For staff that work at beaches, and have equipment that requires decontamination, a disinfection product must be supplied that meets the requirements set out by Health Canada<sup>2</sup>.

### **Physical distancing for patrons**

While patrons are moving through and using the facility, support physical distancing efforts by a variety of measures including:

- Decommission some lockers in changerooms to ensure two metres (six feet) distancing between lockers available for use.
- Increase the frequency of cleaning and disinfection.
- Limit changeroom occupancy/stagger changeroom access.
- Designate bathrooms to be single user where possible, and clean and disinfect between uses.
- Use appropriate signage strategically placed in conspicuous positions, such as:
  - at the entrance and on doors
  - at reception
  - on walls inside changerooms and washrooms and
  - on the floor to reinforce physical distancing requirement

To reduce the amount of time in changerooms, patrons should be encouraged to come to the facility already wearing their bathing suits.

**Shower areas.** Operators can install mobile splash protection walls or decommission every other shower where showers are set up in close proximity to each other so as to respect two metres (six feet) physical distance between patrons. In shower areas where there are individual shower stalls then every other shower can be taken out of operation to ensure proper physical distancing. Touchless soap dispensers should be provided to patrons so that they can take a cleansing shower. Where this is not possible, an alternative method for bathers to shower should be devised after consideration of the risk assessment results.

Proper shower etiquette protocols should be clearly communicated and enforced, including the use of soap and the maintenance of two metres (six feet) of physical distance.

**Swimming pool area.** The following measures are recommended in the pool and on the pool deck:

- Seating in the swimming pool area should be removed or reduced so that a distance of two metres (six feet) can be maintained; for continuous seating areas such as benches, distance markings should be made to clearly identify two metres (six feet).

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<sup>2</sup> <https://www.canada.ca/en/health-canada/services/drugs-health-products/disinfectants/covid-19/list.html>

- Place two metres (six feet) distance markings on the ground in front of equipment (slides, diving boards, etc.). Where this is not possible or where lineups for these items interfere with patron flow on deck, the equipment should be closed.
- Small pools with limited space may need to be taken out of operation or changed to restricted access that is strictly enforced.
- Reduce the number of swimmers allowed in the pool to ensure adequate physical distancing. The initial number of patrons should be reduced by at least 75% and adjusted often as conditions change.
- The number of swimmers can be increased only if physical distancing of two metres (six feet) can effectively be maintained by all users and staff.
- Lifeguards should be trained and given the authority and resources to enforce physical distancing on pool deck and in the pool up to and including asking patrons to leave if they refuse to follow safety measures.
- Lane lines used during recreational swims should be established to enable patrons to maintain the appropriate safe physical distance. Only drop off buoy lines should be maintained during open recreational swims. Lane lines may be used during lesson periods and lane swims to reinforce physical distancing.

Any equipment provided to the public should be cleaned and disinfected following each use. Operators may restrict equipment usage if disinfection is not feasible, and items from home should not be allowed on the pool deck.

#### **Sauna area.**

- Best practice is to close saunas.
- If open, place physical distance markings inside saunas. If the sauna space is too small, then they should not be opened to the public or should be single use only, with strict monitoring.
- Reduce the number of loungers and seating options and keep a clear distance two metres (six feet).
- Ensure appropriate cleaning and disinfecting after each use, if permitted.

**Viewing gallery.** This area should be evaluated for movement and flow during peak times, such as the start and stop of classes.

- The viewing area should be closed if the area is too small or congestion will happen when the public enter or exit. If possible, use one access point for exit and one access point for entry. Alternatively, the number of attendees in the gallery can be restricted through signage or staff monitoring the use of the area.
- Pay particular attention to gallery-style seating areas as the patrons seated above and behind other patrons potentially have a greater contamination area (stagger the seats to ensure two metres (six feet) separation).
- Ensure seating is removed or roped off to ensure two metres (six feet) separation.

## **Equipment room**

Access to the equipment room should be restricted to staff only. If equipment such as lifejackets, flutter boards, etc. are shared with patrons they should be cleaned and disinfected before and after each use.

## **Activity Assessment**

Swimming pools in general provide recreational swimming, lessons and competitions, aqua-fitness classes, and various rental periods. Every activity must be considered individually to determine how staff will manage the flow of patrons.

- It may be necessary during any one of the above activities to reduce the number of patrons in the overall facility at one time to ensure that users are granted enough space to comply with the required physical distancing rules of two metres (six feet). This can be achieved through control at the registration desk, reservation, or class registration system, or other control measures in the changing area. The number of patrons should be regularly assessed.
- Management should review planned activities for the swimming pool and anticipated numbers of attendees, their expected use area within the pool and pool deck, and equipment and staff requirements. A daily schedule should be mapped out indicating pool use, patron flow, equipment uses, etc. Parameters for the safe operation of these activities should be established and then monitored and adjusted regularly.
- Cleaning protocols should be created that will ensure adequate cleaning and disinfection of these areas.
- The employer must establish a tracking system of when the tasks were completed.
- While working, cleaning staff should close off the area to other people.
- Use damp cleaning methods such as damp clean cloths, and/or a wet mop. Do not dust or sweep which can distribute virus droplets (fomites) into the air.

It is likely that the first activities permitted in public pools will be those that can easily accommodate physical distancing such as swim clubs, lane swims, aqua-fitness, parent and tot swims, staff training sessions, etc. As measures ease, aquatic instruction lessons for participants that do not require in water support by instructors may be introduced. Finally, lesson programs with full instructor-in-water support and open recreational swims will be permitted as pool operation returns to normal. Management should take into account this phased in approach when planning the reopening of public pools.

**Training.** After updating relevant procedures to ensure staff are protected from the hazard of COVID-19, staff should receive training. This training should focus on the following:

- Facility requirements for physical distancing two metres (six feet) and disinfection protocols.
- In-water rescues and lifeguard Interventions protocols with respect to transmission mitigation, including the use of PPE.
- First aid and resuscitation protocols with respect to transmission mitigation.

- Operators should provide at least the following PPE equipment for staff
  - Surgical mask, face and eye protection, gloves and hand sanitizer
  - **when physical distancing is not possible:** fit tested N95 masks, face and eye protection, gloves and hand sanitizer.
- Employers must also provide training on PPE use ([review PPE section from sector sheet](#))
- Staff on lifeguard towers may wear gloves and have other PPE equipment readily available. Lifeguard towers must be cleaned and disinfected between lifeguard rotations.
- It is important that when employers require workers to use hazardous products, that workers are trained ([See CUPE's WHMIS Sheet](#)).
- Mannequins (as opposed to people) should be used for in-water and CPR skill assessment to eliminate person-to-person contact during first aid or resuscitation skill assessments or practice situations.
- In-water rescue-breathing or victim assessments should not be used at this time.
- Clean and disinfect all training equipment before and after training using appropriate measures recommended by the manufacturer.

### **Personal Protective Equipment**

PPE is worn by individuals to reduce exposure when in close contact to suspected or confirmed cases of COVID-19. Employers must ensure that adequate supplies of PPE are available to workers, and they have been provided training on how and when to use it. PPE is a last resort and the lowest level of hazard control. If it PPE is required to be worn, workers should be mindful of the following:

**First Aid Rescue.** Before First Aid and/or Resuscitation is initiated, lifeguards must don appropriate PPE to protect themselves, their co-workers and other responders. Employers should purchase specific equipment which prevents exposure to respiratory infections during first aid resuscitation efforts. Employers must ensure proper equipment is available for various rescue procedures to prevent the spread of COVID-19.

- Additional information can be found in the Lifesaving Society's *Guide to Reopening Pools and Waterfronts*:  
[https://www.lifesavingsociety.com/media/324917/98guide\\_reopening%20pools\\_waterfronts\\_finalr%20-%20june%202020.pdf](https://www.lifesavingsociety.com/media/324917/98guide_reopening%20pools_waterfronts_finalr%20-%20june%202020.pdf)