Winnipeg

Audit Department
Service de vérification

# Safety Review of the City of Winnipeg Outdoor Aquatic Facilities

April 2018

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## AUDIT BACKGROUND

***The Lifesaving Society – Manitoba Branch was awarded a contract to conduct the safety review of the City's outdoor aquatic facilities.***

- On March 20, 2013, a Safety Review of the City of Winnipeg Indoor Aquatic Facilities was presented to Council, at which time a motion was approved to include a Safety Review of the City of Winnipeg Outdoor Aquatic Facilities to the Audit Plan.
- A safety review of the City of Winnipeg Outdoor Aquatic Facilities was included in the City Auditors Audit Plan 2015 – 2018.
- The Audit Department issued a Request for Proposal (RFP) to identify experienced and capable proponents to conduct the review. In June 2017, a contract was awarded to the Lifesaving Society – Manitoba Branch Inc. The proposal was evaluated based on the experience of the proponent, the proposed project approach/methodology and a fixed-price quote.
- The work performed under the contract consisted of a safety review of all ten outdoor swimming pool facilities, a sample of nine wading pool facilities and three spray pads.
- The Lifesaving society evaluated the overall operation of the outdoor aquatic facilities selected through on-site inspections conducted July 13, 2017 to August 18, 2017.
- The Lifesaving Society identified a series of recommendations for improvement.
- The audit methodology is located in **Appendix 1**.

## AUDIT OBJECTIVE

***Improve the safety processes and practices of the City of Winnipeg outdoor aquatic facilities.***

- The objective of this audit was to evaluate the outdoor aquatic facilities safety processes and practices and report on the facilities adherence to Manitoba regulations and the Lifesaving Society best practices.

## CITY AUDITOR SUMMARY

***This safety audit presents the Priority and Primary Recommendations identified by the Lifesaving Society.***

- The Audit Department reviewed the report provided by the Lifesaving Society and we are presenting the Priority and Primary Recommendations identified by the Lifesaving Society, which are categorized according to Lifesaving Society's perceived impact on safety.
- The Priority and Primary Recommendations are divided into two sub-categories based on an assessment by the Lifesaving Society:
    - Findings that do not meet the Province of Manitoba regulations, and
    - Findings that do not meet the Lifesaving Society's position on what constitutes reasonable safe practice.
- The recommendations presented in this report are all Priority and Primary Recommendations, which in the opinion of the Lifesaving Society address an unreasonable risk to public safety.

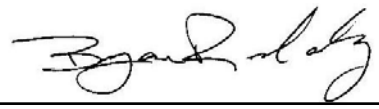
## INDEPENDENCE

The Audit Department is classified as an independent external auditor under *Government Auditing Standards* due to statutory safeguards that require the City Auditor to report directly to Council, the City's governing body, through the Audit Committee.

The Audit Department team members selected for the audit did not have any conflict of interest related to the audit's subject matter.

## ACKNOWLEDGEMENT

The City of Winnipeg Audit Department would like to acknowledge the assistance of staff from the Aquatic Services Division, Community Services Department and the Municipal Accommodations Division, Planning, Property and Development Department who were involved in this project, for their assistance in providing time, information, expertise, co-operation and resources throughout the duration of the project. In addition, we would like to acknowledge the Lifesaving Society – Manitoba Branch, which was engaged to conduct the review.



Bryan Mansky, CPA, CMA, MBA, CIA
City Auditor

March 2018
Date

# CITY OF WINNIPEG AQUATIC SERVICES AND THE LIFESAVING SOCIETY

## 1.1 City of Winnipeg Community Services Department

- The mission statement of the Community Services Department is: “Working together to build strong communities”.
- The Department has a guiding principle to maintain that a safe and healthy environment is a priority in the Department, for staff as well as the public who receive their services.
- The objectives of the Department and division align with the directions outlined in OurWinnipeg under recreation which include:
    - Promote and enable opportunities for all age groups to be active as part of their daily lives.
    - Work with community partners to provide services that are responsive to the community’s recreation and leisure needs.
    - Directly provide, or facilitate through partnerships, equitable access to a base level of recreation, culture and leisure services for all Winnipeggers.
    - With community partners, participate as a leader in planning and delivering recreation and leisure services in Winnipeg.
    - Provide or facilitate community development and recreation opportunities for vulnerable youth.
    - Plan for sustainable and connected recreation and leisure infrastructure.

## 1.2 City of Winnipeg Aquatic Services

- The City of Winnipeg outdoor aquatic services are jointly provided by staff in the Aquatic Services Division of the Community Services Department, for the recreational programming and operation of public services, and the Municipal Accommodations Division of the Planning, Property and Development Department, for building and water condition maintenance.
- The outdoor aquatic facilities are comprised of a total of: 10 outdoor pools, 83 wading pools, and 20 spray pads which operate on a seasonal basis.
- There are 47 permanent staff positions which include: 1 Manager, 3 Recreation Coordinators, 1 Storekeeper, 6 Pool Supervisors, 19 Head Instructor Guards, 1 Chief Swim Instructor, 3 Active Living Supervisors, 1 Recreation Technician, and 12 Clerks/Cashiers as well as 279 temporary positions comprised of Instructor Guards, Clerks/Cashiers and Wading Pool positions.
- The City of Winnipeg swimming pools and wading pools are regulated under the Province of Manitoba’s Public Health Act Regulation 132/97 - the Swimming Pools and Other Water Recreational Facilities (MR 132/97).
- Annually, the City of Winnipeg is required to apply for a permit to operate the outdoor pools and wading pools. Before an outdoor aquatic facility site is opened, an initial inspection is conducted by a Manitoba Public Health Inspector. If any item of concern is identified, the City is issued a notice to correct, which is remedied by the City. The inspector will return for another inspection and once satisfied that the facility meets provincial regulations and that the facility is safe for public use, an annual operating permit is issued.
- The City of Winnipeg has continuously been successful in obtaining the operating permits, as issued by the Province of Manitoba - to ensure compliance with the regulation, for all outdoor aquatic facilities.

## 1.3 The Lifesaving Society

- The Lifesaving Society is an independent, charitable organization providing programs, products and services designed to prevent drowning and water-related injury.
- While Manitoba public pools are regulated under the Province of Manitoba's Public Health Act Regulation 132/97, the Lifesaving Society has developed further standards based on extensive research of existing standards, guidelines and best practices from Canada and abroad, which address additional safety issues or topics that provincial regulations or guidelines may be silent on which have been deemed relevant by the Lifesaving Society.
- The Lifesaving Society standards presented in the Lifesaving Society's Public Pool Safety Standards document are to provide further guidance to public pool owners and operators on matters not addressed in regulation or guidelines in their own jurisdictions, and assist aquatic staff in operating safe facilities.
- The safety standards do not replace or supersede the Manitoba Regulations, but they are considered, by the Lifesaving Society, the standard which facility operators should work towards to enhance safety within their operations and to prevent drowning.

# SAFETY AUDIT PROCESS AND SUMMARY OF FINDINGS

## 2.1 Aquatic Safety Audit Process

- The Lifesaving Society audit team completed the inspection of the selected outdoor aquatic facilities between July 31 and August 18, 2017. In their detailed inspections, the auditors examined the facilities applying criteria developed by the Lifesaving Society from sources that include:
    - Government of Manitoba regulations governing public swimming pools.
    - Recommendations from coroners' inquests.
    - Lifesaving Society standards concerning the operation of public swimming pools.
    - Lifesaving Society research into drowning's in swimming pools.
- The audit team followed a process that included:
    - On-site safety inspection of the aquatic facilities.
    - Interviews with front-line and management staff at various levels within the facilities.
    - A review of existing documentation provided to staff concerning the operation of aquatics in the facilities.
    - Completion of a final report.
- The safety review consisted of reviewing the safety processes and practices in place for the aquatics services and covered the following key areas: facilities and equipment, water conditions, human resource management, facility compliance with applicable federal, provincial and industry regulations and internal policies and procedures, and records management.
- Furthermore, recommendations on the best practices for spray pads were provided to management; spray pads are currently not regulated by the Provincial or Federal Government.
- A list of facilities, to be included in the safety review, was provided to the Lifesaving Society by the City of Winnipeg Audit Department. The sample of facilities was created in consultation with management from Aquatics Services and Municipal Accommodations to identify the wading pools and spray pads which may be higher risk based on criteria such as the age of the facility, the location, and the use of the facility. The facilities reviewed by the Lifesaving Society included:
    - All 10 outdoor swimming pool facilities,
    - 9 wading pool facilities, and
    - 3 spray pads.
- The complete list of outdoor aquatic facilities reviewed is located in **Appendix 2**.
- Following the facility inspections, the safety audit team conducted interviews with a selected cross-section of the City of Winnipeg employees representing various relevant functions supporting aquatic services delivery. The interviews were designed to gather the views of staff on the aquatics operations.
- The safety audit team examined the aquatics-related literature and focused on the Aquatic Services Division Procedure Manual and the Wading Pool Procedure Manual 2017, which are used to direct the operation of aquatic facilities.
- In addition to certifications and training required under Manitoba Regulations, the Aquatics Division requires all staff to complete child protection training courses conducted by the Canadian Center for Child Protection. A review of staff completion of this course was included in the review conducted by the Lifesaving Society.

## 2.2 Summary of Findings

- The Lifesaving Society's aquatic safety audit presents eleven Priority Recommendations and twenty-five Primary Recommendations[1].
- Priority Recommendations are the highest risk findings and represent, in the opinion of the Lifesaving Society, major safety risks to the public that require immediate action. These concerns are discussed by the auditors with the designated facility representative immediately following the facility inspection.
- Primary Recommendations are findings that should receive focused attention by facility management. These findings are not considered to have as high of a risk exposure and represent a lower risk to public safety as compared to the Priority Recommendations. Primary Recommendations identified situations that either did not meet a relevant Province of Manitoba regulation, or, in the opinion of the Lifesaving Society, did not constitute reasonable safe practice.
- The City of Winnipeg is required to comply with Manitoba Regulations; they are not required to comply with the Lifesaving standards and guidelines.
- The Lifesaving Society considers an organization to be operating within their defined range of safe practice if the aquatic safety audit identifies no Priority Recommendations, and only Primary Recommendations which in the opinion of the Society represents a low risk to public safety.
- An organization is considered to be operating below the range of safe practice if any Priority Recommendations are identified, or if any Primary Recommendations address what the Lifesaving Society considers to be unreasonable risk to public safety.
- It is the Lifesaving Society's opinion that at the time of the audit, the City of Winnipeg's outdoor aquatic facilities were operating below the Lifesaving Society's range of safe practice based on criteria that include:
    - Government of Manitoba statutes governing public swimming pools.
    - Recommendations from coroners' inquests.
    - Lifesaving Society standards concerning the operation of public swimming pools.
    - Lifesaving Society research into drowning's in swimming pools.
- All eleven Priority Recommendations and twenty-five Primary Recommendations, in the opinion of the Lifesaving Society, presented unreasonable risk to public safety.
- Recommendations identified as low risk by the Lifesaving Society, were presented to the management of Aquatic Services and Municipal Accommodations to be reviewed and considered for implementation.
- The Lifesaving Society assigns Priority and Primary Recommendations in one of four categories – Personnel, Emergency and Operating Procedures, Communication and Facility and Equipment.
- In addition, Priority and Primary Recommendations have been made which are related to specific sites. These recommendations are to be applied across all outdoor aquatic facilities if applicable.

[1] The Audit Department reviewed the recommendations of the Lifesaving Society and at the request of the Community Services Department combined some recommendations as they identified a similar issue and would be addressed by the same management implementation plan.

# PRIORITY RECOMMENDATIONS

## 2.1 Lifesaving Society Priority Recommendations

The Society's aquatic safety audit revealed eleven findings which have been identified as Priority Concern status: five findings, which the Lifesaving Society believes, did not meet the applicable Government of Manitoba regulation (recommendations 1 – 3, 8 & 9), and six findings that are not consistent with the Lifesaving Society's position on what constitutes reasonable safe practice (recommendations 4 – 7, 10 & 11). The following recommendations, comments and findings were presented by the Lifesaving Society.

## 2.2 Government of Manitoba Regulation

### Personnel

No Recommendations

### Emergency and Operating Procedures

**Recommendation 1** – Ensure that facility first aid kits are stocked to the level required by regulation at all times. Review and revise policies and procedures around the checking and stocking of first aid kits. (Manitoba Regulation P210 - 132/97, Section 10 [1] and Schedule B)

- At the time of the audit 10 out of the 18 facilities surveyed did not meet the equipment levels required to be present in a first aid kit by regulation. Lack of an up to date first aid manual, and the presence of pointed tweezers were common issues noted.

- Checklists were in place in all facilities surveyed to ensure that the contents of first aid kits were reviewed on a daily basis. Despite these checks taking place, there was still a lack of compliance.

***Management Response***

- Management agrees with the recommendation. Corrections to the First Aid kits were made once identified by the Auditors. Current published first aid manuals were put in place. Management agrees to revise current procedures to ensure first aid kits are stocked as per Manitoba Public Health Act regulations.

*Implementation Date:* Completed. Ongoing practice.
*Lead:* Aquatic Services Division

**Recommendation 2** – Add a bottom visibility/object check to the end of day procedures for all outdoor pools, and ensure that these checks are conducted and logged on a daily basis. (Manitoba Regulation P210 - 132/97, Section 17 [1])

- To review for water clarity issues and to ensure that no patrons are left in the pool after closing, a check of the bottom of the tank should be added to the closing procedures for the facility. These checks should be logged on the Daily Safety Checklist that lifeguard staff are responsible for completing.

***Management Response***

- Management agrees with the recommendation. The Aquatic Services Division will implement visibility/object check to the end of day procedures for all outdoor pools. This will be implemented for 2018 Summer Season and continue to be our practice.

*Implementation Date:* Effective 2018 Summer Season
*Lead:* Aquatic Services Division

## Communication

No Recommendations

## Facility & Equipment

**Recommendation 3 –** Ensure that all single sources of suction within the basins of outdoor pools are deactivated and sealed. (Manitoba Regulation P210 – 132/97, Section 8 [2 & 3])

- Skimmer equalizers and vacuum line attachment ports represent suction entrapment hazards in pools. Two facilities inspected had open skimmer equalizers, and all outdoor pools appeared to have in basin vacuum attachment ports that were usable (the auditor's only witnessed pool vacuuming taking place at the Kildonan Park Outdoor Pool).

***Management Response***

- Management agrees with the recommendation as a best practice, beyond what is required in the Manitoba Regulation. Since the audit, management has completed the review of the deactivation and sealing suction sources to further reduce any source of entrapment during operation. All pumps, when not in use, are turned off as well as the valves, and ports are capped. In basins, vacuum attachment pumps are only operational when pools are not in use.

*Implementation Date:* Completed
*Lead:* Planning, Property and Development Department

## 2.2 Lifesaving Society Recommended Best Practices

The following priority recommendations are identified as areas that are not consistent with what the Lifesaving Society believes are reasonable safe practice. In these instances, there may be no applicable Manitoba Regulation governing the area or the Lifesaving Society recommended practice exceeds the requirements of the Manitoba Regulation.

### Personnel

No Recommendations

### Emergency and Operating Procedures

**Recommendation 4** – Add a pool outlet/drain cover check to the operating procedures for all outdoor pools, and ensure that these checks are conducted and logged at least once a month.

- While the frequency of inspection and the requirement for written records is not specified in Manitoba Regulation P210 - 132/97, Section 8 [2 & 3], The Lifesaving Society has adopted this standard as a best practice. Damage to the pool outlet/drain covers (corrosion, breakage, etc.) is a potential hazard to pool patrons. An inspection of all pool outlets/drain covers should be made at a minimum once every 30 days, and a written log of the checks maintained on site at the facility for a minimum of one year.
- Wading pools that are filled and maintained throughout the season rather than filled and drained on a daily basis should be treated as outdoor pools for the purpose of this recommendation.

***Management Response***

- Management agrees to add monthly checks to log books effective 2018 Summer Season.

*Implementation Date:* Effective 2018 Summer Season
*Lead:* Planning, Property and Development Department & Community Services Department (Wading Pools)

**Recommendation 5** – Ensure that access to all facility filter/mechanical rooms is restricted to authorized staff only.

- At many of the facilities the auditors visited, the doors to filter rooms or mechanical spaces were left open for “ventilation” purposes. Leaving these doors open could result in distracted staff not seeing children entering into the filter rooms, by accident or on purpose. Access by patrons to this space could result in serious injury due to the mechanical gear and chemical stored inside.

***Management Response***

- Management agrees to develop site specific solutions; and develop a staff procedure for staff training effective 2018 Summer Season.

*Implementation Date:* Effective 2018 Summer Season
*Lead:* Planning, Property and Development Department & Community Services Department (Staff Training)

## Communication

**Recommendation 6** – Ensure that signage detailing the City of Winnipeg's Aquatic Facility Admission Standard is posted outside of all aquatic facilities.

- In many cases, the signage developed to indicate admission requirements to the public for both the outdoor pools and its wading pools are posted along with the general facility rules sign inside of the facility and is only visible to the public once they have gained admittance. Posting the admission policy outside of the "admission only" area allows for better screening of patrons before they enter, can contribute towards greater public education on the need for adult supervision of children and general water safety issues and can lower the need for facility staff to answer questions or deny patrons entry due to non-compliance.

***Management Response***

- Management agrees to explore the implementation of a second set of Admission Standard signs to be located outside of the 91 outdoor aquatic facilities. Signage is located at all facilities as required by Manitoba Regulations. However, signs are located within the fenced area of the facilities to deter theft and vandalism. Admission standards are reviewed at the point of entry. Posted rules are often referred to within the facility when enforcing safety rules.

*Implementation Date:* Effective 2020 Summer
*Lead:* Aquatic Services Division

City Auditor Comment
In this instance the Department is not in contravention of a Manitoba Regulation; the recommendation is identified as an area that is not consistent with what the Lifesaving Society believes is a reasonable safe practice.

At this time, management has not committed to implement the recommendation. The risk of not placing appropriate signage outside of aquatic facilities is the Department misses an opportunity for greater public education on the need for adult supervision of children and general water safety issues.

**Recommendation 7** – Post signage at all wading pools indicating that "No Diving" is allowed at any time.

- Ten facilities selected for audit with wading pools did not have signage which clearly indicated that diving was not allowed in the facility. Diving is mentioned on wading pool rules signs, but it is in the context of causing injury to other patrons, not in regards to it being unsafe for the patron or a direct breach of safety rules.

***Management Response***

- Management agrees to place additional "No Diving" signs at wading pools. Wading Pool Rules include "No Diving" at all locations, as required by the Manitoba Regulations. In an effort to enhance awareness and associated risks, in 2018, a pictorial version of the "no diving" rule was posted to overcome potential language barriers. Management is also in the process of adding deck stencils of the universal "No Diving" symbol at the 81 wading pool facilities, where feasible.

*Implementation Date:* In Progress
*Lead:* Aquatic Services Division (Community Services Department) and Planning, Property and Development Department

## Facilities and Equipment

No Recommendations

## 2.3 Site Specific Priority Recommendations

Four Priority Recommendations presented by the Lifesaving Society's outdoor aquatic safety audit are related to specific facilities: two, which the Lifesaving Society believes, did not meet the applicable Government of Manitoba regulation (recommendations 8 & 9) and two findings that are not consistent with the Lifesaving Society's position on what constitutes reasonable safe practice (recommendations 10 & 11). While the following recommendations were made in relation to specific sites, the recommendations apply to all outdoor aquatic facilities and should be implemented across all outdoor aquatic facilities if applicable.

### Government of Manitoba Regulation

**Recommendation 8** – Ensure that Chlorine and pH levels are kept within the legal limits set out in regulation at all times the facility is in operation. Review and revise wading pool attendant training on required chemical levels and testing procedures. (Manitoba Regulation P210 – 132/97, Sections 16 & 17[3])

- *Observed at: River Osborne Wading Pool & Shaughnessy Park Wading Pool*

- Regulations require that free chlorine be maintained between 1.0 and 5.0 mg/l and that pH be maintained between 7.2 and 7.8 at all times that the facility is in operation unless otherwise approved by a public health inspector. The pH readings at the River Osborne Wading Pool during the site visit had been sitting at 8.2 for most of the day according to the pool logbook. A review of the chemical records at the Shaughnessy Park Wading Pool for the previous day showed test results of free chlorine between 5 and 10 mg/l and pH from 7.5 to 8.2.

- Based upon observations made at the River-Osborne Wading Pool and the Shaughnessy Park Wading Pool, the required levels for chlorine and pH were not within the levels stated in the regulation and there was no evidence that maintenance staff were called to check on situations not in compliance with the regulation. It was also observed, at the Shaughnessy Park Wading pool, that the drop test kits to check for chlorine and pH levels were not being used properly.

***Management Response***

- Management agrees and Aquatic Services will collaborate with Municipal Accommodations to determine alternative delivery methods of training to ensure compliance effective 2018 Summer Season.

*Implementation Date:* Effective 2018 Summer Season
*Lead:* Aquatic Services Division

**Recommendation 9** – Ensure that the cargo door into the storage space and filter room area is secured at all times when not in use. (Manitoba Regulation P210 – 132/97, Section 16)

- *Observed at: St. Vital Outdoor Pool & Wading Pool*

- A large cargo door that opens into the storage space/filter room area of the facility remained open throughout the entire time the auditors were at the pool, including after maintenance staff left to visit another site to complete maintenance tasks. Leaving this

door open to the outside of the facility creates multiple risks to the safety of the public, patrons and staff.

***Management Response***

- Management agrees to further educate employees to ensure the door is secured when not in use effective 2018 Summer Season.

*Implementation Date:* Effective 2018 Summer Season
*Lead*: Aquatic Services Division

## Lifesaving Society Best Practice

**Recommendation 10** – Install emergency stop buttons at both the bottom and top of the waterslide.

- *Observed at: Kildonan Park Outdoor Pool*

- In case of emergency the ability to stop the operation of the waterslide quickly may be required. These buttons need to be easily accessible at all times, and clearly labeled as to their function.

***Management Response***

- Management agrees to review the feasibility of an emergency shutdown button on the pool deck at the Kildonan Park Outdoor Pool. This would be an enhanced safety practice above the existing Manitoba Regulations. Current practice includes assigned, dedicated lifeguards to monitor patron use of the slide, to attend to any immediate situation on or near the slide zone.

*Implementation Date:* Review to be completed by Summer 2019
*Lead*: Planning, Property and Development Department

City Auditor Comment
In this instance the Department is not in contravention of a Manitoba Regulation; the recommendation is identified as an area that is not consistent with what the Lifesaving Society believes is a reasonable safe practice.

At this time, management has not committed to implement the recommendation. The risk of not installing emergency stop buttons at both the bottom and top of the waterslide is that lifeguards will not be able to quickly stop the operation of the waterslide if required.

**Recommendation 11** – Complete a full review of lifeguard coverage zones in the facility. Conduct a review of all facility positioning, scanning and rotation charts at all outdoor pools to ensure that they are effective tools to advise staff of the areas of responsibility and coverage.

- *Observed at: St. Vital Outdoor Pool & Wading Pool*

- There were no large scale charts posted at the facility that showed guard coverage zones for different numbers of lifeguards on deck and different bather loads. Two hand-

drawn paper charts showed coverage zones however the illustrated zones did not cover the entire facility.

- The City of Winnipeg has created positioning charts which can be hard to understand and do not always clearly set out zone responsibilities and rotation procedures. All of the scanning and rotation charts should be reviewed to ensure they consider the following:
    - The lifeguard must be able to see all of the pool (including the bottom) all of the time.
    - Lifeguards who are conducting facility swim tests cannot also be supervising a section of the pool.
    - Separate charts should be created where patron or lifeguard numbers increase and/or where different parts of the pool areas are open or closed for public use or where glare relocates due to changing light conditions.
    - Staff positions and rotation directions should be clear on the charts.
    - Scanning zones should be clearly marked and appropriate overlap areas should be noted.
    - Colors should be used where possible to better define intensive & extensive scanning areas.
    - All staff should be clear on what they must see from specific positions and what they should do if conditions change and they are not able to see all areas of their intensive scanning zone, including the pool bottom.
    - Provide additional training for all staff in these supervision protocols.
    - All charts should be reviewed as part of a facility orientation process and during staff training.

***Management Response***

- Management agrees to review all outdoor pool coverage zones for each facility effective 2018 Summer Season. Although not required by Manitoba Public Health, management currently develops coverage zone charts and agrees to review existing scanning charts for the recommended areas effective 2018 Summer Season.

*Implementation Date:* Effective 2018 summer season, ongoing practice.
*Lead:* Aquatic Services Division

# PRIMARY RECOMMENDATIONS

## 3.1 Lifesaving Society Primary Recommendations

The Society's outdoor aquatic safety audit identified a total of twenty-five Primary Recommendations, which the Lifesaving Society identified as unreasonable risk to public safety: eighteen findings, which the Lifesaving Society believe do not meet an applicable Government of Manitoba regulation (recommendations 12 – 16 & 21 - 33), and seven findings that are not consistent with the Lifesaving Society's position on what constitutes reasonable safe practice (recommendations 17 – 20 & 34 - 36).

## 3.2 Government of Manitoba Regulation

### Personnel

**Recommendation 12** – Review procedures on how staff certifications/training records are recorded, stored and maintained. (Manitoba Regulation P210 – 132/97, Section 12 [2] & Manitoba Regulation P210 – 132/97, Section 43)

- Records of Aquatic Services staff qualifications are maintained in an excel spreadsheet, spot checks of physical certification cards are conducted when staff select hours of work, with this information transferred to the spreadsheets. In addition, an internal Peoplesoft database is maintained to track completion of staff training sessions and the completion of child protection training courses.
- Spreadsheets can be used as part of a tracking system however the information in the spreadsheet cannot be verified without a hardcopy of the certification. The only definitive proof for completion of training is a verified copy of the training record (certification card, trainer report, verified electronic record).
- In addition to the Manitoba regulatory requirements for certifications, City of Winnipeg Aquatics Services directs all staff to complete a child protection training course. Completion of this course is maintained in the Division's Safety database. At the time of the audit, it was identified that information was missing from the Safety database and that information had not been saved upon input. Auditors were unable to obtain proof that five instructors in total, from the 20 sites surveyed, had completed the child protection training course. All other staff at surveyed sites were found to meet the site specific training and child protection training.
- The Lifesaving Society recommends that the following points be kept in mind as procedures are reviewed for staff training records:
    - Must be verifiable from any site at any time.
    - Must be held in a secure fashion.
    - If an electronic database is used, track which users have accessed, edited, viewed or otherwise manipulated employee records.
    - Should be in the form of one central collection/database so that additional information such as the employee's current work cluster does not have to be known to pull up a record.
    - Should contain a copy of the employee's original certification record to assist in verification purposes if any investigation is required, or if there is any question about certification status.

***Management Response***

- Management agrees to review procedures. We are currently in compliance with Manitoba Public Health regulations for water safety related certifications. In addition to currently storing hard copies of qualifications at our home base sites, management now maintains hard copies of staff training from the Safety Training Database (additional, non-water safety related training). This was implemented in November 2017.

*Implementation Date:* Completed
*Lead:* Aquatic Services Division

City Auditor Comment

- Completion of the child protection training course, by City of Winnipeg Aquatics Services staff, is additional training that goes beyond the requirements for training and certifications in the Manitoba Regulation. Completion of the child protection training course is not required by regulations.

## Emergency and Operating Procedures

**Recommendation 13** – Develop site specific procedure manuals for all outdoor pools and wading pools. (Manitoba Regulation P210 – 132/97, Section 23.1)

- Each outdoor aquatic site needs to have a policy and procedure manual developed that details the unique factors of the site and how staff adapt their general training to working at that site. Auditors located up to date site-specific manuals for both the Fort Garry Lions and Westdale Outdoor Pools during visits, but did not find site-specific manuals at all other sites visited.

***Management Response***

- Management agrees to create site specific procedure manuals for all outdoor pools and wading pools. This process will start in the 2018 Summer Season and will be completed in 2 years. Management currently supplies Aquatic Services Division procedure manuals and trains for standard operations and pool procedures.

*Implementation Date:* Start 2018 summer season. Complete in 2 years.
*Lead:* Aquatic Services Division

### Communication

No Recommendations

### Facilities and Equipment

**Recommendation 14 –** Ensure that all outdoor pools have a 150 mm black disk on a white background permanently affixed at the deepest point in the pool. (Manitoba Regulation P210 – 132/97, Section 17 (1))

- The water clarity standard was met in all facilities surveyed by the auditors. Most of the outdoor pools already have black disks of the appropriate size affixed to their deepest points. However, none of these disks are mounted on a white background to provide the required amount of contrast for the legal water clarity test to be conducted. The

Lifesaving Society considers it best practice for this black disk and white background to be affixed permanently to the deepest point of the pool.

***Management Response***

- Management agrees to enhance safety by placing the existing black disk on white painted background by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 15** – Ensure that all skimmer covers/lids are secured so that the skimmers cannot be accessed by patrons. (Manitoba Regulation P210 – 132/97, Section 8 (2))

- The majority of outdoor pools were found to have unsecured skimmer covers at the time of inspection. All skimmer covers/lids should be secured during operating hours to ensure that cuts, scrapes and other injuries are avoided, as well as the chance of patrons causing damage to the circulation system by introducing foreign objects into the skimmers. It is especially important that skimmers being used to house cyanuric acid packs to help stabilize chlorine in the outdoor pools are sealed as this substance can be quite harmful if not handled appropriately or if ingested by a child.

***Management Response***

- Management agrees. Skimmers are cleaned every day; cyanuric acid packs are encased in protective socks. Skimmer lids are repaired when defaults are discovered. Skimmers with acid packs will be the first priority to be repaired.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 16** – Arrange for a full Health & Safety Committee inspection review of all aquatics sites prior to opening for the 2018 season. (Manitoba Regulation W210 – 217/2006, Section 6.1 – 6.5, Section 21, Section 35.15, Section 35)

- A wide variety of workplace safety and health violations were noted by the auditors and differences in practice between the twenty sites were obvious and pronounced. As part of this review the Lifesaving Society recommends that the following areas be included in the checks:
    - Presence of eyewash stations in all required locations
    - Eyewash stations are all in good operation
    - Solution in eyewash stations has been refreshed as appropriate
    - Chemicals are stored neatly and safely
    - Chemicals are stored off the ground
    - Chemicals are separated according to class and type.
    - Safety Data Sheets are present in appropriate sites
    - Safety Data Sheets are up to date (within 5 years)
    - Safety Data Sheets are easily accessible.
    - All required Personal Protective Equipment (PPE) is present.
    - All PPE is easily accessible
    - All PPE is clean and ready for
    - All PPE is clean and ready for use

- All PPE is located in one designated location

***Management Response***

- Management agrees to review the feasibility of Workplace Safety and Health inspections for all 81 wading pools, similar to what is conducted at outdoor pools. This secondary inspection would be in addition to the inspections conducted by Manitoba Public Health performed prior to opening for the season. For enhanced safety, management will add checking the condition of the eyewash station to the daily checklist for each site.

*Implementation Date:* Review to be completed by Summer 2019. Daily checklist to include checking eyewash stations to be completed by Summer 2018.
*Lead:* Aquatic Services Division and Planning, Property and Development Department

City Auditor Comment
The Lifesaving Society identified a Manitoba Regulation as the source for non-compliance. The Community Services Department disagrees with the Lifesaving Society's interpretation of the regulation. The Regulation does not state that inspections conducted by a full Health and Safety Committee are required.

At this time, management has not committed to implement the recommendation. Workplace Safety Inspections are conducted for outdoor pools, which include a review of the items identified on the list provided by the Lifesaving Society. However, the noted differences in practice between the sites indicates a training opportunity to ensure greater consistency in the work performed by the staff tasked with conducting the Workplace Safety Inspections.

## 3.2 Lifesaving Society Recommended Best Practices

The following primary recommendations are identified as areas that are not consistent with what the Lifesaving Society believes are reasonable safe practice. In these instances, there may be no applicable Manitoba Regulation governing the area or the Lifesaving Society recommended practice exceeds the requirements of the Manitoba Regulation.

### Personnel

No Recommendations

### Emergency and Operating Procedures

**Recommendation 17** – Review and revise the City of Winnipeg's Aquatic Facility Admission Standard.

- Based upon extensive research into drowning incidents at public pools, the Lifesaving Society recommends the following changes to the Admission Standard:

    a) Remove the height requirement for entry to all facilities and focus on ensuring swimming ability tests and adult supervision are in place at all times. Swimming ability and adult supervision (or the lack of either or both) are risk factors for drowning in young children. Height requirements should be retained, however only for special water features such as slides, etc. where height may be a determining factor in safe use.
    b) Include in the admission standard, which is consistent across all facilities, the manner in which those cleared for access beyond the basic level will be identified (wrist band, swim cap, etc.).

***Management Response***

- Management disagrees with the recommendation to remove the height requirement. Height requirement is not used as a determinant of a patron's swimming ability. Factors such as age, swimming ability, and height are considered to determine adequate parental supervision and safe participation in the water, including use of lifejackets and restrictions to the shallow end. If a patron wishes to be cleared for access beyond the basic level, the patron is required to demonstrate adequate swimming ability by completing a swim test. If the patron is successful, they are granted a wristband. These admission standards are consistently applied at all indoor and outdoor pools. Management will review national admission standards to ensure the City of Winnipeg admission standards for pools meets current needs.

*Implementation Date:* Review to be completed by Summer 2020.
*Lead:* Aquatic Services Division

City Auditor Comment
In this instance the Department is not in contravention of a Manitoba Regulation; the recommendation is identified as an area that is not consistent with what the Lifesaving Society believes is a reasonable safe practice.

Management has disagreed with the recommendation. The risk of not revising the Admission Standard is that the level of swimming ability is not considered when admitting patrons.

**Recommendation 18** – Adopt a medical condition admission standard.

- As a best practice signage regarding medical conditions should be installed in the entranceway to all City of Winnipeg aquatic facilities. The Lifesaving Society recommends the use of a statement such as the following:

  *"Individuals with a serious medical condition should first consult with a doctor before engaging in aquatic activities. It is recommended that they be accompanied by a person knowledgeable of their condition and responsible for their direct supervision."*

***Management Response***

- Management agrees to review signage; this may include the addition of a medical condition standard for both indoor and outdoor pools by the end of 2019.

*Implementation Date:* Review to be completed by 2020
*Lead:* Aquatic Services Division

City Auditor Comment
In this instance the Department is not in contravention of a Manitoba Regulation; the recommendation is identified as an area that is not consistent with what the Lifesaving Society believes is a reasonable safe practice.

At this time, management has not committed to implement the recommendation. The risk of not adopting a medical condition admission standard is the patrons with medical conditions may not consider the appropriate precautions before entering the swimming pool.

## Communication

No Recommendations

## Facilities and Equipment

**Recommendation 19** – Ensure that all outdoor pools have their tanks coloured white.

- The Lifesaving Society recommends as a best practice that white is used for the colour of all pool basins as it allows for better spotting of submerged individuals and objects in a pool.

*Management Response*

- Management disagrees. Currently, all outdoor pool tanks are light in colour, which meets the Manitoba Regulation. The Audit references Public Pool Safety Standards for best practice, which further states that in the event that this standard varies from a Provincial/Territorial regulation, the Provincial/Territorial regulation shall prevail. Management will discuss the recommendation of white tanks with Manitoba Public Health and possibly consider in the future. To ensure safety standards are consistent throughout the City of Winnipeg, any changes to the outdoor pool tank standard should also be consistently applied to indoor pool operations.

*Implementation Date:* Review to be completed by Summer 2019
*Lead:* Planning, Property and Development Department

City Auditor Comment
In this instance the Department is not in contravention of a Manitoba Regulation; the recommendation is identified as an area that is not consistent with what the Lifesaving Society believes is a reasonable safe practice.

At this time, management has not committed to implement the recommendation. The Department has asserted that all pool tanks are a light colour; the Lifesaving Society suggested safe practice is that pool tanks be white because there is no consensus on what constitutes a "light" colour for pool basins across North American guidelines.

**Recommendation 20** – Outline all main drains/outlets in outdoor pools with a band of contrasting colour.

- The Lifesaving Society recommends as best practice that all outlets be outlined with a band of colour (5 – 10 cm in width) that contrasts with both the pool basin, and the outlet cover. Lifeguards are then trained to recognize that any time they cannot see the entire band of colour around the outlet they must investigate.

***Management Response***

- Management agrees and will implement by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

## 3.3 Site Specific Primary Recommendations

The Lifesaving Society's outdoor aquatic safety audit presents sixteen Primary Recommendations related to specific facilities, which present unreasonable risk to the public: thirteen, which the Lifesaving Society believes, did not meet the applicable Government of Manitoba regulation (recommendations 21 – 33) and three findings that are not consistent with the Lifesaving Society's position on what constitutes reasonable safe practice (recommendations 34 – 36). While the following recommendations were made in relation to specific sites, the recommendations apply to all outdoor aquatic facilities and should be implemented across all outdoor aquatic facilities if applicable.

### Government of Manitoba Regulation

**Recommendation 21** – Safety equipment needs to be placed in locations where it will not create a trip & fall hazard and where it will be immediately accessible in case of emergency. (Manitoba Regulation P210 – 132/97, Section 13(1))

- *Observed at: Fort Garry Lions Outdoor Pool, Freight House Outdoor Pool, Transcona Aquatic Park, Westdale Outdoor Pool.*
    - Reaching poles in the facility are laid on the pool deck or in the grass surrounding the pool during operation hours. These present trip and fall hazards for pool patrons and may not be immediately accessible in case of an emergency.

- *Observed at: Happyland Outdoor Pool.*
    - There were two reaching poles on deck at the facility during the inspection. In both cases lounging chairs with patrons in them were pulled in front of these safety aids, preventing ready access in case of emergency.

***Management Response***

- Management agrees. Safety equipment will be accessible in case of emergency and will not be located in areas where it will create a trip and fall hazard. Staff will review safe work practice at site specific training by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Aquatic Services Division

**Recommendation 22 –** Install an eyewash station in the Filter Room, mount in a location where it is accessible and can function properly and ensure eyewash bottle and/or solution is present. (Manitoba Regulation W210 – 217/2006, Section 6.1 – 6.5, Section 21)

- *Observed at: Freight House Outdoor Pool, Happyland Outdoor Pool, Norwood Outdoor Pool, Provencher Outdoor Pool, Transcona Aquatic Park, Home Playground Wading Pool, Keenleyside Park Wading Pool, West Kildonan Memorial Community Centre Wading Pool.*

- At various sites the auditors could not locate an eyewash station in the filter room or it was located in a place which was not an immediately accessible location. Workplace Safety and Health Regulations require an eyewash station to be installed in a space where individuals will be handling chemicals. Furthermore, at the time of the inspection

at the Transcona Aquatic Park, the auditors found a mount on the wall for an eyewash bottle in the waterslide pump and filter room, but no eyewash bottle or solution was present.

***Management Response***

- Management agrees to work with Workplace Health & Safety to ensure eyewash stations are accessible and operational and add to the daily check list by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 23 –** Ensure that all required Personal Protective Equipment for handling chemicals is available in the Filter Room or on site and in a centralized location. (Manitoba Regulation W210 – 217/2006, Section 6.1 – 6.5, Section 21)

- *Observed at: Freight House Outdoor Pool, Happyland Outdoor Pool, Provencher, St. Vital Outdoor Pool & Wading Pool, Transcona Aquatic Park, Windsor Park Outdoor Pool, Machray Park Wading Pool & Spray Pad, West Kildonan Memorial Community Centre Wading Pool.*

- In a number of facilities the auditors could not locate the necessary personal protective equipment - rubberized boots, goggles/face mask, chemical apron or work gloves - in the filter room, mechanical space or area used for chemical storage.

***Management Response***

- Management agrees to review and ensure Personal Protective Equipment is available by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 24 –** Create a roped off splash down zone for the waterslides when they are in operation. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Non-compliant facility: Kildonan Park Outdoor Pool.*

- The two waterslides in the Kildonan Park Outdoor Pool facility empty into middle section of the main tank which is used as a general play area for pool patrons. To prevent patrons from being hit and injured by sliders who are exiting the flume at speed when it is in operation, there should some form of barrier or buffer zone between the slide's drop zone and the remainder of the shallow end.

***Management Response***

- Management disagrees. The Manitoba Public Health Regulation does not state that a roped off splash down zone for the waterslides is required. Rather, to enhance patron safety, there are designated lifeguards assigned to the splash down zone, which surpasses the effectiveness of a roped off area. In order to create a roped off splash down zone for the Kildonan Park Pool waterslides, a significant portion of the shallow end area would need to be roped off across the complete width of the pool to anchor the ropes securely. Additional ropes would cause further confusion with patrons and

distractions for guards monitoring patrons who are lifting the ropes to pass through the shallow water area.

City Auditor Comment
Management disagrees with this recommendation and has identified an alternative for monitoring any potential hazards related to the splash down zone for the waterslides. The Lifesaving Society identified a Manitoba Regulation as the source for non-compliance. The Regulation states that "No person shall operate a swimming pool or other water recreational facility where there are protrusions, means of entanglement or other hazards that might cause injury to a bather or other person in or around the swimming pool facility".

The risk of not creating a roped off splash zone for the waterslides is that patrons could collide if the designated lifeguard's attention is diverted from the area.

**Recommendation 25** – Ensure that all the joints of the waterslide are caulked and sealed. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Non-compliant facility: Kildonan Park Outdoor Pool.*

- The auditors found that all of the joints inside of both waterslides in the facility were uncaulked. This creates some rough transitions between sections of the flume and may result in cuts and scrapes for users.

***Management Response***

- Management agrees and will add a requirement to inspect and record waterslide joints frequently by June 30, 2018. Repairs are currently completed every spring prior to opening and throughout the season as required.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 26 –** Review safety precautions for metal hatches/panels located on the pool deck. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Observed at: St. Vital Outdoor Pool & Wading Pool.*

- There are several metal hatches/panels located on the pool deck. In the sun they heat up throughout the day and may present a safety hazard for patrons or staff who walk on them. Some form of safety protocol for these panels, which does not add any other safety hazards to the facility, needs to be devised that both protects patrons and staff and allows access to the panels when required for maintenance.

***Management Response***

- Management agrees and will place mats in a safe manner and add to the daily checklist by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 27** – Review all change room partitions for damage. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Observed at: St. Vital Outdoor Pool & Wading Pool.*

- In the women's change room area the auditors found one change cubicle door that had a loose strip of metal on it. This strip of metal had a screw attached to it and could present an entrapment hazard for fingers, or cause other injury to patrons.

***Management Response***

- Management agrees to review and repair as required by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 28** – Patch or remove metal tubes in the wading pool deck. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Observed at: St. Vital Outdoor Pool and Wading Pool.*

- A series of metal tubes are fixed in the deck around the wading pool and project above the level of the concrete used for the deck. These present a safety hazard to patrons who could cut or scrap themselves quite easily on these items.

***Management Response***

- Management agrees to review and address by June 30, 2018. The tubes are anchors for safety netting.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 29** – Review the attachment of diving boards to platforms. (Manitoba Regulation P210 – 132/97, Section 8 (2))

- *Observed at: Transcona Aquatic Park.*

- Both the 1 meter and 3 meter diving boards at the facility sit on platforms with attached ladders. These platforms have a gap between the top step and the diving board that allows for a person to catch their foot, possibly causing a trip, fall, entrapment or other injury.

***Management Response***

- Management agrees to review with Manitoba Public Health to ensure diving boards adhere to provincial regulation by June 30, 2018. The board at Transcona Aquatic Park met regulations in 2017.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 30** – Ensure that all cylinders of compressed gas are secured against falling over. (Manitoba Regulation W210 – 217/2006, Section 19.10)

- *Observed at: Transcona Aquatic Park.*

- Carbon dioxide gas in cylinders is used to help buffer the pool and is stored in two locations on the site. Cylinders being stored in the old chlorine gas room were secured with chains against the wall with no issue. Cylinders stored in the waterslide filter and pump room were free standing if knocked over and fractured could cause an explosive force.

***Management Response***

- Management agrees and will review and correct where necessary by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 31 –** Review the storage of pool chemicals on site. (Manitoba Regulation W210 – 217/2006, Section 35.2)

- *Observed at: Westdale Outdoor Pool.*

- Chemicals were not stored neatly on site, and most chemicals found on site were sitting directly on the floor where they could become contaminated. Best practice is to raise all stored chemicals off the floor (using a pallet or other method) to prevent any water leakage from affecting them, and also to allow the early detection of any leaking storage containers.

***Management Response***

- Management agrees to add pallets on site for the safe storage of chemicals by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 32 –** Repair or replace all loose drain covers on the pool deck. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Non-compliant facility: Windsor Park Outdoor Pool.*

- The auditors found two drain/maintenance covers on deck that were loose and which could be lifted up without much effort, as well, the plate cover that was loose concealed what appeared to be broken pieces of pool infrastructure. To prevent cuts, scrapes, entrapment of fingers and toes or other injury these drain covers should be repaired or replaced immediately.

***Management Response***

- Management agrees and will review and correct loose drain covers by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 33 –** Review safety measures for the metal covers/plates located on the edge of the wading pool and the surrounding apron. (Manitoba Regulation P210 – 132/97, Section 8(2))

- *Observed at: Home Playground Wading Pool.*

- What appears to be a large metal drain plate is bolted into the edge of the pool, and a very large metal plate on the pool apron, including an attached hatch, appears to cover part of the mechanical workings of the wading pool. Both of these plates will heat up in sun as the day progresses, and are a potentially safety hazard to patrons in bare feet. Rubberized mats may be present to alleviate this hazard, but were not deployed at the time of the inspection. Rubberized mats do not eliminate the risk of these metal items, as they can curl up when wet or heated (depending on style and age), thus creating a trip and fall hazard.

***Management Response***

- Management agrees and will review and correct where necessary by June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

## Lifesaving Society Best Practice

**Recommendation 34 –** Review the placement of the buoy line that separates the deep end from the shallow end.

- *Observed at: Fort Garry Lions Outdoor Pool, Freight House Outdoor Pool, Norwood Outdoor Pool, Transcona Aquatic Park, Windsor Park Outdoor Pool.*

- A buoy line should be used to denote the change from shallow water to deep water, and that this line should be offset 300 millimeters (30 centimeters) to the shallow side of the transition as this provides a safety buffer for all patrons before they reach the deep water. This best practice has been adopted based upon requirements in various building codes for new pool construction.

***Management Response***

- Management agrees to review the placement of buoy lines in both outdoor and indoor pools to ensure safety standards are consistent throughout the City of Winnipeg operations. Management exceeds the Manitoba Regulations by having buoy lines. Non-swimmers are restricted from the deep end and a swim test is mandatory before they may proceed beyond the buoy lines into the deeper water.

*Implementation Date:* December 2019
*Lead:* Planning, Property and Development Department

**Recommendation 35 –** Ensure that the ledge in the deep end of the pool is painted or outlined in a different colour.

- *Observed at: Norwood Outdoor Pool, Windsor Park Outdoor Pool.*

- Ledges in the deep end, if they are the same colour as the pool basin, can be very hard to see as they blend into the basin. Building code for new swimming pool construction requires that all ledges be outlined or coloured in a contrasting colour to the remainder of the basin.

***Management Response***

- Management agrees to the recommendation and will paint as suggested prior to June 30, 2018.

*Implementation Date:* June 30, 2018
*Lead:* Planning, Property and Development Department

**Recommendation 36 –** Add handrails to the facility diving boards.

- *Observed at: Provencher Outdoor Pool.*

- Neither of the two diving boards have handrails. For maximum patron safety the Lifesaving Society recommends as best practice that all facilities require handrails for all diving boards except deck level boards.

***Management Response***

- Management agrees to discuss with Manitoba Public Health what handrails may be suitable for existing diving boards at the Provencher Outdoor Pool.

*Implementation Date:* Review to be completed by Summer 2019
*Lead:* Planning, Property and Development Department

City Auditor Comment
In this instance the Department is not in contravention of a Manitoba Regulation; the recommendation is identified as an area that is not consistent with what the Lifesaving Society believes is a reasonable safe practice.

At this time, management has not committed to implement the recommendation. The risk of not adding handrails to the diving boards is that patron safety is not maximized.

## APPENDIX 1 – Audit Methodology

### MANDATE OF THE CITY AUDITOR

- The City Auditor is a statutory officer appointed by City Council under *The City of Winnipeg Charter*. The City Auditor is independent of the Public Service and reports directly to Executive Policy Committee, which serves as the City's Audit Committee.
- The City Auditor conducts examinations of the operations of the City and its affiliated bodies to assist Council in its governance role of ensuring the Public Service's accountability for the quality of stewardship over public funds and for the achievement of value for money in City operations.
- Once an audit report has been communicated to Council, it becomes a public document.

### PROJECT RISK ANALYSIS

- City of Winnipeg Aquatic Services provides services to the citizens of the City of Winnipeg which could pose safety risks.
- The following potential risks were considered when conducting the safety audits:
    - Are the outdoor aquatic facilities meeting the requirements of the applicable Manitoba regulations?
    - Are there additional best practices which could enhance the safety processes and practices followed by Aquatic Services?
    - Do all staff have the necessary certifications and training?

### SCOPE

- The Lifesaving Society was contracted to perform a review of the safety processes and practices in place for the aquatics services.
- The inspection of aquatic facilities was conducted between July 31 and August 18, 2017. The listing of facilities to be reviewed included:
    - All 10 outdoor swimming pool facilities.
        - 7 stand-alone outdoor pools;
        - 1 outdoor pool and wading pool; and
        - 2 outdoor pools with spray pads.
    - 9 wading pool facilities.
        - 4 stand-alone wading pools;
        - 2 wading pools with spray pad onsite;
        - 1 wading pool with a slide;
        - 1 wading pool with spray features; and
        - 1 wading pool with slide and spray pad nearby.
    - 3 spray pads.

## APPROACH AND CRITERIA

- This safety audit work was contracted out to the Lifesaving Society due to the unique skill set required to conduct the safety reviews.
- The Lifesaving Society conducted a comprehensive review of the aquatics operation utilizing a three-stage approach: literature review, inspections of the facilities, and interviews.
- The review included:
    - Reviewing the safety processes and practices of both the Aquatics Services Division and the Municipal Accommodations Division.
    - Conducting a comprehensive review and inspection of selected facilities.
    - Outlining the observations through the use of Lifesaving Society checklists on the extent to which reported service safety results are complete, relevant, accurate, balanced and meaningful.
    - Inspecting records management including the condition, quality and accessibility of policies and procedures, inspection results, safety performance metrics, and other safety documentation.
- To conduct the detailed inspections, The Lifesaving Society examined the facilities applying criteria developed by the Lifesaving Society from sources that include:
    - Government of Manitoba regulations governing public swimming pools.
    - Recommendations from coroners' inquests.
    - Lifesaving Society standards concerning the operation of public swimming pools.
    - Lifesaving Society research into drowning's in swimming pools.

## APPENDIX 2 – List of Outdoor Aquatic Facilities Reviewed

| Outdoor Aquatic Facilities | Outdoor Pool | Wading Pool | Spray Pad |
|---|---|---|---|
| Westdale Outdoor Pool | X | | |
| Fort Garry Lions Outdoor Pool | X | | |
| St. Vital Outdoor Pool & Wading Pool | X | X | |
| Happyland Outdoor Pool | X | | |
| Norwood Outdoor Pool | X | | |
| Provencher Outdoor Pool | X | | |
| Windsor Park Outdoor Pool | X | | |
| Freight House Outdoor Pool | X | | |
| Kildonan Park Outdoor Pool | X | | |
| Transcona Aquatic Park | X | | |
| Home Playground Wading Pool | | X | |
| Keenleyside Park Wading Pool | | X | |
| Fort Garry Lions Wading Pool | | X | |
| McKittrick Park Wading Pool | | X | |
| Pacific Dee Park Wading Pool | | X | |
| River Osborne Wading Pool | | X | |
| Shaughnessy Park Wading Pool & Spray Pad | | X | X |
| Machray Park Wading Pool & Spray Pad | | X | X |
| West Kildonan Memorial Community Centre Wading Pool | | X | |
| Park City West Spray Pad | | | X |