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By Post & Email

12th April 2019

Dear HM Senior Coroner,

RE Death of Mr Thompson on 28th June 2018, and report to prevent future deaths

Thank you for the letter of 15th February 2019. This letter sets out the steps we have taken to date and our further action.

Background

The Royal Society for the Prevention of Accidents (RoSPA) is a charity in existence for over a century, we are concerned with the prevention of accidents across the full range of life, both in the UK and abroad. RoSPA has no regulatory role, or enforcement powers.

In considering our response we held discussions with: The Health and Safety Executive; United Utilities as the duty holder at Audenshaw Reservoir; the Inland Waters Group, a national group of companies with duties for inland waters within the National Water Safety Forum; the National Fire Chiefs Council drowning prevention lead.

The following responses are that of RoSPA. We have not visited the location in question and offer no commentary with respect to measures in place. Our key actions are numbered to the structure of your letter.

A future without drowning: the UK drowning prevention strategy

RoSPA host and provide the secretariat to the National Water Safety Forum (NWSF), a collective network that includes landowners, rescue organisations and sporting bodies. In 2016 it published the UK's first national drowning prevention strategy: A future without drowning (1). Our drowning prevention activity, and those of the NWSF network, is aligned to towards this strategy. Of particular note to this response are the targets for Community risk plans, Awareness of risk, Swimming and water safety education.



Risk management and warning signage for the public

Under UK health and safety law, it is incumbent upon the duty holder to maintain a system which identifies and manages risks to those affected by the workplace. RoSPA would expect the drowning of a member of the public at a reservoir to be a foreseeable risk. The question of how this is subsequently managed, by law, rests with the duty holder. We publish specialist, collectively agreed guidance to assist with these decisions. Further, we have previously assisted Water UK in the production of their guidance for reservoir safety.

There is a range of opinions on the role and effectiveness of 'safety signage' in public settings as a strategy to reduce drowning. Signage at inland water settings has developed through risk assessment or custom and practice, rather than a specific duty in law to place them in these settings.

RoSPA's view is that signage can be effective if applied as part of an overall set of measures, but is very much secondary to interventions such as clear level footpaths or limited use of barriers at key points to deflect falls. Our preferred approach is to offer an integrated set of messages i.e. on website/media, targeted awareness campaigns and if needed specific advice on site.

Action 1. We have recently updated our national guidance: *Managing Safety at Inland Waters (2)*. This is our principal advice for duty holders, and it includes examples and approaches such as risk communication and identification of hazards. The latest edition was published December 2018, and it is our intention to contact all Local Authorities and known key duty holders including reservoir companies to inform them of the updated advice before the end of 2019.

Cold Water Shock: awareness of this principal risk factor

RoSPA and other specialists in the drowning prevention community are strongly of the opinion that Cold Water Shock (CWS) is the principal danger to life for those that enter water quickly in the UK. The extent of the danger is not understood well by the majority of the UK population.

CWS is an involuntary physiological response that overwhelms a person's ability to control breathing and affects swimming performance. This creates a sense of panic and rapid breathing, which can lead to aspiration of water and ultimately start the drowning process, resulting in death or life-changing injury. The critical window is the first few minutes of entry, after which the person's body acclimatizes to the temperature. We have previously funded research to better understand this event (3).

CWS can be stopped before it escalates into a drowning. In addition to warnings, education on practical steps such as Float First, Float To Live, and Swim Safe campaigns could save a life.

Action 2. Steps that raise awareness of this principal risk, and importantly why it is a risk at a given location, will have a positive impact. It is our aim to include members of Water UK as a key group before the end of 2019 to this end.

Autism as a risk factor

There is published evidence that highlights an increased risk of drowning among younger children. We have searched our fatal drowning databases for incidents between 2007- 2018 and found: eight drowning incidents involved persons with autism reported as a pre-existing condition; of these, two were children under 10-years-old, the remainder between 20-30 years-old; all were male. In the same period over 8000 people died due to drowning.

Action 3. The impact of autism on non-fatal drownings is not known in the UK. We have commissioned an analysis of trauma data to better evidence a collective understanding of autism as a risk factor. This is expected to be ready for publication before the end of 2019.

Action 4. We will support the fire services' and partners' efforts to develop and formalise a national education pack to help the water safety or general safety practitioner to understand autism better. At the time of drafting this response I am not in receipt of an agreed publication date, but will confirm in writing by the end of July 2019.

Community level plans

Drowning is a complex event; its causes can be found in the wider community as much as the immediate location, for example swimming ability or infrastructure that requires improvement. In order to prevent the next drowning event, consideration of the community as a whole is needed.

During 2018 we worked with The Manchester Water Safety Partnership to review drowning incidents within Manchester City Centre, and to develop a plan for the City Centre as a whole to stop the next drowning. This was presented to the Greater Manchester Mayor in November and launched in December (3). The review considered waterways within the city, and included land within Manchester and Salford Local Authorities. Over the study period we found 28 drownings within the City Centre. We identified a further 111 drownings across other Greater Manchester authorities, to the best of our knowledge, there are no equivalent plans in place.

Action 5. It is our intention to invite all Greater Manchester Local Authorities to a workshop to consider the findings from the City Centre review and the above points.





accidents don't have to happen

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We were deeply saddened to hear of Mr Thompson's death. If it is considered helpful we would be willing to meet with Ms Thompson.

Thank you for the opportunity to respond.

Yours sincerely,



Head of Leisure Safety

cc.

Errol Taylor, Chief Executive, RoSPA

NFCC Drowning Prevention Group

Manchester Water Safety Partnership

The Health and Safety Executive

United Utilities

Water UK

NWSF Inland Waters Group

