

Mr Edward Ramsay
His Majesty's Assistant Coroner for Swansea and Neath Port Talbot
The Guildhall
Swansea
SA1 4PE

29 July 2025

Dear Mr Ramsay,

Re: Regulation 28 report to Prevent Future Deaths
DAVID CHIAKA EJIMOFOR

Thank you for your report to our Chief Executive regarding the death of David Chiaka Ejimofor and for setting out your concerns.

As the Chief Operating Officer at the RNLI, I am responsible for the lifeguarding service and as such I am responding on behalf of the Chief Executive.

As set out at the inquest, although the RNLI chooses to provide lifeguarding services, it has no legal duty to do so. Importantly, it cannot provide any service without the landowners or the occupier's request or consent. It is entirely a matter for the landowner or occupier whether they ask and contract with the RNLI to provide a lifeguarding service.

However following the inquest, the RNLI is taking two actions:

1. Undertaking daily monitoring of people using:
 - i. Aberavon beach
 - ii. Little Beach (the beach to the left of the breakwater if looking out to sea)
 - iii. The breakwater

The monitoring started on Saturday 24 May 2025 and takes place between 10:00 and 19:30.

The purpose of the daily monitoring is to understand how many people are using Little Beach and, importantly, how many people are entering the water from the breakwater. This will allow the RNLI to make recommendations to its partner, Neath Port Talbot Council.

The monitoring will continue for the remainder of the 2025 Lifeguarding Season. Following completion of the season, a report will be prepared with recommendations.

2. We will work collaboratively with Neath Port Talbot Council and Association British Ports given the Coroner's concerns.

In considering what action the RNLI will take, or recommend, we will take into account the wider issues which are set out below.

The Lifeguarding Challenge

As discussed at the inquest there is no statutory requirements for a landowner to contract for a beach lifeguard service. Even if it was a statutory requirement, it is improbable or more accurately impossible, that all beaches could be lifeguarded and even if they were it would be for defined seasons and defined times of day.

Further, the UK has:

- Over 7,000 miles of coastline (depending on how it is measured)
- 1,500 listed beaches
- 600 designated bathing waters, mostly beaches

Currently the RNLI is the largest provider of lifeguard services and in 2025 will patrol 249 sites on behalf of a range of clients, predominantly local authorities. There are fewer than 300 lifeguarded beaches across the UK.

It should be noted that the RNLI does not independently provide any lifeguard services that are not linked to clients and currently the RNLI does not have a contractual relationship with the owner of the breakwater.

Specific to jumping from structures into the water

Jumping from varying heights into water occurs from both natural and manmade structures all around the UK. In a controlled activity it is referred to as coasteering and as uncontrolled/unregulated activity it is referred to as tombstoning.

The National Water Safety Forum (NWSF) states that *'It is important to recognise that tombstoning is an activity that has occurred around the coast for generations. Unfortunately, over recent years it has gained attention for the wrong reasons, with a number of people being killed or seriously injured. The title was adopted because of the way a person falls and plunges into deep water, in a similar way a stone would. Tombstoning is typically undertaken by individuals, with varying degrees of planning and formality attached. Quite often, the media will use the tag 'tombstoning' to describe a wide range of activities where people jump into the water from height.'*

Restricting access or even universal provision of signage at all possible sites would be almost impossible and, in many locations, would prove to be highly unpopular.

The UK has:

- 100's of miles of coastal paths
- 433 official harbours
- 62 seaside piers
- There are 100s of breakwaters of various designs, many that provide access to deeper water locations from the beach
- On usually a smaller scale, but often presenting the same management issues there are 1,000s of groynes and other sea defences, many that also provide access to deeper water locations from the beach

Restricting access

Options that restrict access such as fencing would be cost prohibitive and are likely to be defeated by individuals swimming or wading around the obstacle. Restricting access to aquatic locations is counter to the general principle of facilitating access to green and blue spaces.

The National Water Safety Forum (NWSF) has published principles for managing water related risks, the fundamentals of which include, that:

- No activity can be made completely risk-free.
- As far as possible, avoid restricting access to water spaces or facilities.
- As far as possible, avoid additional regulatory controls.

Lifeguards are normally deployed to facilitate bathing rather than preventing aquatic activities. If solely deployed to stop access it would be more appropriate to deploy a security guard or warden service.

Given the above challenges core swimming and self-rescue skills are important.

Core swimming and self-rescue skills

A key element of an individual's safety in water is their swimming ability. The requirement in the UK is that all schools must provide swimming instruction either in key stage 1 (children 5-7 years old) or key stage 2 (children 7-11 years old).



Pupils should be taught to:

- swim competently, confidently and proficiently over a distance of at least 25 metres
- use a range of strokes effectively [for example, front crawl, backstroke and breaststroke]
- perform safe self-rescue in different water-based situations

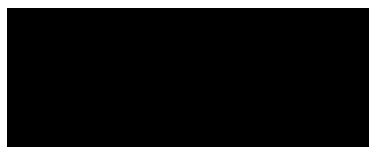
Unfortunately, not all children are achieving against the prescribed standard and a 2023-24 academic year report states that only 70% of Year 7 pupils (aged 11-12) can swim competently, confidently and proficiently over a distance of at least 25m.

Summary

The RNLI will progress with the two actions set out above.

Further the RNLI acknowledges that anyone can drown but no one should, and David's death was a tragedy. The RNLI is a charity that works to end preventable drowning, and we will continue to influence, supervise and educate people and explain the risks and share safety knowledge with anyone going out to sea or to the coast.

Yours sincerely,



Chief Operating Officer & Director of Regions, RNLI