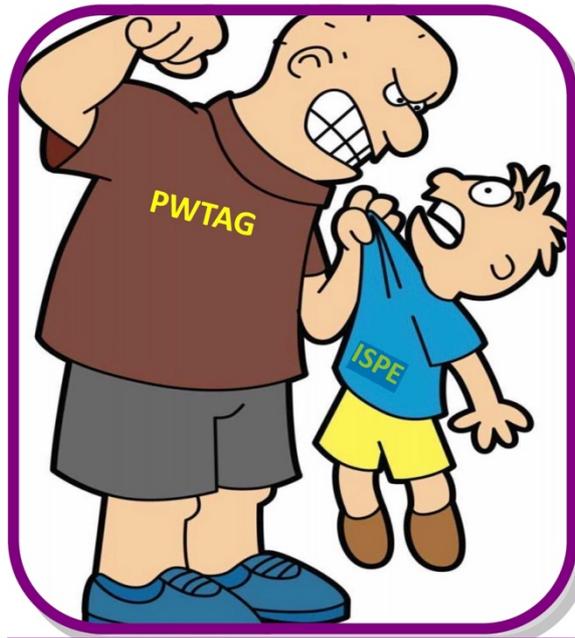


## PWTAG 'FORCING' ISPE INTO BECOMING ACCREDITED BY THEM



Back in December 2017, whilst reading through PWTAG's new publication, I noticed two items that I felt were definitely outside PWTAG's remit. On page 3 they stated, '*Swimming Pool Water is considered to be the authoritative guidance for swimming pools in a court of law.*' I personally am unsure if this is the case, or is it just PWTAG's opinion.

On page 33 they stated, '*Training should be suitable and sufficient and should be accredited by the Pool Water Treatment Advisory Group (PWTAG)*'.

As a deliverer of Institute of Swimming Pool Engineers (ISPE) endorsed training courses, along with other ISPE endorsed deliverers, (plus in the opinion of the majority of ISPE directors) it was agreed that this use of PWTAG's dominant position in the industry was a clear abuse of that position. This sentiment was generally shared by others in our great industry.

Following legal advice I wrote to PWTAG stating that I believed that this was a breach of anti-competitive legislation and a clear example of an abuse of their dominant market position. I furthermore requested that the paragraph was removed from the manual on the next pressing but, in the interim, amended in the form of an over-sticker applied to every copy of the book in stock that they supply, and, in addition, that a simple retraction and/or amended statement be published on their website.

These, I thought were reasonable requests.

PWTAG replied, '*Training organisations are not being prevented from operating and are free (AW says: definitely not free, it actually costs £500.00 to become accredited) to submit their training to PWTAG. PWTAG is solely an advisory body so it does not and cannot act as a gatekeeper. Anybody can apply to have their training course accredited and the course can have additional content in it, if they want*'.

In an email from Ralph Riley, he stated the following: '*As the person responsible for training through PWTAG I have been charged to respond to your email. Perhaps you are right, and we should not have*

*said that pool operator training should be accredited by PWTAG, but this is one of the problems of writing by committee.' He continued, 'Well you asked the question of HSE and were told **that training does not have to be PWTAG accredited.**'*

**In the interim period PWTAG stated: 'Should does not mean must!'** yet this definition of 'should' does not appear anywhere in their book, unlike HSG179 which defines this terminology by stating, *'Should does not indicate a legal requirement'*.

PWTAG then put the following, yet again ambiguous, statement on their website:

*'The 2017 edition of Swimming Pool Water (page 33) recommends that pool operator training should be: 'suitable and sufficient and should be accredited by the Pool Water Treatment Advisory Group (PWTAG).' Accreditation shows that the training meets the requirements of the Code of Practice. To clarify, training that is to the same standard as PWTAG's, but is not formally endorsed by PWTAG, **may** also be suitable and sufficient. In such circumstances, pool managers should satisfy themselves that the training provided incorporates the information in PWTAG's training syllabus. It can of course include additional material.'*

I firmly believe as a minimum it should say **'will'** and not **'may'**, but again this appears to me to be an example of PWTAG's dominant attitude to others in the industry. This effects not just ISPE but other quality deliverers such as the BSPF, etc.

At this time of the year, my company, Studies In Work and others, are normally busy delivering training to schools and similar. Recently a number of new and old customers have questioned whether our training is PWTAG accredited, and an example of this is the following email from a customer in Sussex saying: *'Our bursar has not made any decisions as yet, however I would suggest that if our governing body ISI recommend that we are trained by PWTAG accredited companies, then we would most probably go down this route.'* Following this I wrote under Freedom of Information legislation to ISI, Ofsted, and the Department for Education, who all replied saying, *'they do not specify PWTAG accredited deliverers.'* ISI said in their reply *'there are no health and safety regulations for independent schools relating to your enquiry.'*

But the damage is done, and I believe that this will now become the norm, and now the ISPE are in reality being compelled to consider applying for PWTAG accreditation, thanks to PWTAG's autocratic bullying tactics, to prevent ISPE deliverers becoming disadvantaged by this ploy.

What is paradoxical is that the main deliverers of ISPE endorsed training were 'accredited' by the same person within the PWTAG, who was responsible for training approximately thirty years ago within the ISRM or IBRM as it was then. The courses endorsed by the ISPE are, I believe, in many ways, superior to PWTAG accredited training due to both the comprehensive experience and quality of the deliverers, and Studies In Work will continue to offer this training.

This is, to my mind, reminiscent of the ISRM who, many years ago, generally stated that their courses were the only ones advocated in *'Safety in Swimming Pools,'* an HSE publication that at that time was long out of date and had been replaced by HSG179, *'Managing Health & Safety in Swimming Pools'* that, at that time, advocated both ISRM and ILAM equally. It seems that there is a common thread there.

One of the PWTAG council members emailed saying, *'We all give up our free time in order to promote the highest quality of standards and best practice for the industry.'* This I believe to be factually incorrect. Is he saying that they all take unpaid leave from their employers and/or do not receive any expenses or otherwise for attending? **I don't think so!**

Another part of this that I take issue with is this, PWTAG state on their website:

*'Approved training organisation course providers shall furnish course certificate renewal information to PWTAG.'* Would any organisation be naïve enough to hand over details of their customer contact base and also pay PWTAG a fiver for the privilege of each contact submitted? (will this even be permissible under the new 'General Data Protection Regulation', GDPR - May 2018?)

On PWTAG's website they quote revalidation periods of up to five years. Furthermore, they stipulate the maintenance of ongoing training (a great idea) but I would ask *'who by?'* because PWTAG's register of **ON-SITE DESIGNATED SUPERVISOR (ODS)** is noticeably devoid of qualified persons. In reality, employers will comply with the minimum and get staff to attend a course and get a Pool/Spa Plant Operator's certificate. Their boss's certificate is probably in excess of twenty years old and has never been renewed, so who is going to maintain their training? In the last two months I have seen incidents following a failure of automatic dosing equipment where a pool was manually dosed with PAC instead of Sodium hypochlorite. Another, where Hydrogen peroxide was used accidentally as a pH correctant, and both of these incidents were by qualified staff.

One of my major customers stipulates two yearly revalidation as they told me this was the result of a their risk assessments. With first aid or lifesaving, the certificate holders are often tested monthly. I attempt through this magazine to keep people up to date in this industry, yet PWTAG are suggesting revalidation of up to five years; a hazardous practice.

So, a nice thought, this ongoing training, but, just like PWTAG's 'poolmark register' (that was devised when I was ISPE's PWTAG representative many years ago), not much of a success, with only three on the register to date and two of those are the sites of a PWTAG council member.

Incidentally Studies In Work also provide this service. So if this is of interest to you, just get in touch.

**Your Opinion is welcomed on this topic**

**Again, I will repeat what the HSE said:**

**'training does not have to be PWTAG accredited.'**

**Allen J Wilson FISPE, Tech IOSH**

Studies In Work H&S Consultant to the pool & spa industry