

**For discussion on  
24 April 2025**

**Legislative Council  
Panel on Food Safety and Environmental Hygiene**

**Strengthening the Regulation of Life-saving Attendants at  
Private Swimming Pools**

**Purpose**

This paper briefs Members on the regulation of life-saving attendants at private swimming pools by the Food and Environmental Hygiene Department (FEHD), in particular the new measures to be implemented from the swimming season this year to step up efforts in preventing private swimming pools from employing unqualified life-saving attendants.

**Regulation of Life-saving Attendants at Private Swimming Pools**

2. The FEHD regulates privately-operated swimming pools according to the Swimming Pools Regulation (Cap. 132CA) (the Regulation). A licence is required for operating a private swimming pool, unless the pool serves no more than 20 residential units and is not accessible to the public. The number of private swimming pools in Hong Kong has increased in recent years. As at end of 2024, there were 1 422 licensed private swimming pools in the territory, representing a 23% increase compared with the last decade.

3. Swimming pool licensees must comply with the Regulation and the licensing conditions laid down by the FEHD, which include ensuring that pool equipment and water quality meet prescribed standards, and that sufficient qualified life-saving attendants are on duty when the pool is open. The required number of life-saving attendants depends on the scale of the pool, ranging from at least one to eight. Currently, over 70% of swimming pools are required to provide no less than two qualified life-saving attendants. The Hong Kong China Life Saving Society (HKLSS) assesses life-saving attendants' qualifications and issues Pool Lifeguard Awards (PLAs). The PLAs show name and photo of the attendants for identification by swimming pool licensees. Swimming pool licensees can verify a life-saving attendant's identity through checking his/her PLA and

identity document, and may request further verification from the HKLSS where necessary.

4. During the period when swimming pools are open to swimmers, the FEHD officers conduct monthly surprise inspections to ensure that all the requirements, including the number of life-saving attendants on duty, are complied with. The officers will check the PLAs and personal log books of the life-saving attendants on duty, as well as the photographs on these documents, to verify their identities. In case of doubt, the officers will also check the identity documents of the life-saving attendants and verify the validity of their PLAs with the HKLSS. If a licensed private swimming pool is found in breach of the Regulation or the licensing conditions, the FEHD will issue warning or prosecute the licensee according to the actual circumstances. Cases of life-saving attendants using false or other persons' document will be reported to the Police. In 2024, the FEHD conducted 12 828 inspections to licensed private swimming pools (i.e. more than nine inspections to each swimming pool on average) and found four cases of failing to provide sufficient qualified life-saving attendants as required by the law or licensing conditions. The licensees involved have been prosecuted or issued with warnings. In addition, the FEHD verified 187 PLAs of life-saving attendants with the HKLSS in 2024 with no irregularities found.

5. In recent years, the FEHD has implemented a series of measures to strengthen regulation of life-saving attendants at licensed swimming pools, including:

- (a) requiring licensees to display the required number of life-saving attendants during the opening hours of the pool at conspicuous location near pool entrances, and also to display recent photographs, names and PLA numbers of the life-saving attendants on duty at pool deck area, so as to enable pool users to take part in the monitoring; and
- (b) requiring licensees to maintain duty logs of life-saving attendants for at least 90 days for inspection by the FEHD officers.

Other life-saving related measures include establishing a notification mechanism for fatal drowning cases in licensed swimming pools and requiring licensees to report such cases within a prescribed period, as well as encouraging licensees to enhance life-saving, first-aid and resuscitation equipment as necessary, including the provision of lifebuoys, first-aid

boxes, suction devices, oxygen deployment equipment, automated external defibrillators, etc.

## **Enhancement Measures for the 2025 Swimming Season**

6. To further prevent the employment of unqualified life-saving attendants at private swimming pools, the FEHD will introduce a series of enhancement measures in the swimming season this year, mainly on the following three areas:

- (a) requiring swimming pool licensees to perform their responsibilities;
- (b) stepping up inspections and penalties; and
- (c) enhancing collaboration with other departments and organisations.

### **Requiring swimming pool licensees to perform their responsibilities**

7. Private swimming pool licensees have the responsibility to take measures in ensuring that pool operations comply with statutory requirements and licensing conditions, including maintaining sufficient qualified life-saving attendants on duty when the pools are open.

8. To ensure that licensees fulfill their responsibilities properly, the FEHD will, through licensing conditions, explicitly require licensees to verify identity documents, PLA and personal logbook of a life-saving attendant before hiring, and keep a copy of these documents. Also, the FEHD will provide a template of life-saving attendants duty record and require licensees to, according to the template, record clearly the information on the identity document and PLA of the life-saving attendants on duty. The record has to be verified and signed by both the checking officer assigned by the licensees and the life-saving attendants. The FEHD officers will check these records when necessary during inspections or complaint investigations, and follow up on any non-compliance.

### **Stepping up inspections and penalties**

9. The FEHD will step up inspections of licensed private swimming pools. Apart from checking the identity documents and PLAs of life-saving attendants on duty during monthly inspections, all PLA information will be sent to the HKLSS for verification afterward. Special inspections

targeting life-saving attendants of private swimming pools will also be conducted this summer.

10. Considering that having sufficient qualified life-saving attendants is crucial for ensuring swimmers' safety, the FEHD will handle non-compliance cases seriously while giving due regard to the impact of relevant measures on swimmers. The specific mechanism is as follows:

- (a) If a swimming pool is found to have insufficient qualified life-saving attendants on duty, the FEHD will require the licensee to close the pool immediately and issue warning or instigate prosecution according to the actual circumstances. The licensee has to issue a notice announcing the pool closure due to insufficient qualified life-saving attendants (such as posting notices at conspicuous location near pool entrances and, if the pool is in a residential estate, informing the Owners' Corporation (OC) concerned). This helps promote licensee's compliance while keeping relevant persons and swimmers informed so that they can enhance monitoring;
- (b) If a licensee is found, twice in a year, having insufficient qualified life-saving attendants on duty when the pool is open, the FEHD will consider suspending his/her licence for 6 months for deterrent effect. The licensee is also required to notify the relevant persons (such as OC) of the situation; and
- (c) If a licensee is found, thrice in a year, having insufficient life-saving attendants on duty when the pool is open, the FEHD will consider cancelling his/her licence. The licensee whose licence has been cancelled or related persons will not be allowed to apply for a swimming pool licence in respect of the same location within 12 months.

#### Enhancing collaboration with other departments and organisations

11. The FEHD maintains frequent communication with the Leisure and Cultural Services Department regarding swimming pool management matters, including exchanging experiences on verifying qualifications of life-saving attendants. The FEHD has also invited the Police to notify them of case involving suspected use of false documents to impersonate life-saving attendants, so as to allow FEHD to follow up with the licensed swimming pools concerned. The FEHD will continue to maintain close

liaison with relevant departments and with concerted effort, prevent private swimming pools from hiring unqualified life-saving attendants.

12. Meanwhile, many private swimming pools licensees are currently property management companies (PMCs) or their employees. The FEHD has discussed with the Property Management Services Authority (PMSA) to jointly step up publicity and educational work before the swimming season this year. FEHD and PMSA will establish a communication mechanism in respect of non-compliant cases, allowing both parties to follow up with licensees and PMCs according to their respective authorities. Besides, the FEHD has discussed with the Life Saving Society on assisting the department in verifying the validity of PLAs expeditiously. Both the PMSA and HKLSS have publicly expressed their full support for FEHD's various measures to prevent private swimming pools from hiring unqualified life-saving attendants.

### **Way Forward**

13. The FEHD has met with PMC organisations and the hotel industry, with participants generally supportive of the new measures proposed by the FEHD and indicated that they would fully cooperate. The FEHD plans to implement these measures starting from May 2025 and has written to swimming pool licensees to introduce the measures and collect their feedbacks.

### **Advice Sought**

14. Members are invited to note and provide comments on this paper.

**Environment and Ecology Bureau**  
**Food and Environmental Hygiene Department**  
**April 2025**