

Dear Anne

We have received a copy of the Draft Swimming Annual Review 2020-21, and are disappointed by the timing. Prices for 2021/22 were increased before this could be considered. The City of London has also failed to acknowledge the detailed results of our recent survey of swimmers which revealed significant economic impacts of the 2020 price increases and their enforcement. This Review does nothing to address such concerns.

The document was due to be discussed at the Sports Forum on 15 March 2021, where we currently have no representation, and was only sent to us late on Friday 12 March 2021, which is the type of consultation we have become used to. Our comments are as follows:

1. The Review fails to convey quite how disastrous the first online booking platform (ATW) was or the cost incurred (£██████) for this abortive scheme which is the equivalent of over ██████ concession day tickets.
2. You have not conveyed the continued difficulty and exclusion caused by the Eventbrite booking system, which required digital sharp elbows to benefit from. Nor have you conveyed the failure to publicise the telephone booking line number, despite our requests, and which we ended up doing for you. You will note that the highest number of telephone bookings were in respect of the Ladies' Pond (50.6%) which is, we believe, due to our publicising the number directly to our members. We will be doing so again. In 2021 this telephone line should be made available for longer hours, and adequately staffed for those hours.
3. The report states that it was too complicated to use season tickets with online booking for timed sessions in 2020, but this will be in place in 2021. Why was this therefore not possible in 2020?
4. Your online questionnaire in September 2020 was somewhat loaded by being online and directed at people who had engaged with your online booking system or social media feeds. By definition this would have excluded the views of many pond swimmers who had been excluded from your new online systems. The KLPA survey was posted to our non-email members.
5. Can you confirm that stewards will be removed from the gates when Covid-secure arrangements are no longer necessary, possibly from 21 June 2021? This will be an unnecessary cost if continued and some swimmers find their presence intrusive and intimidating. There have on occasion been male stewards at the Ladies' Pond which is generally unacceptable.
6. We continue to be concerned that season tickets can only be purchased in the form of intrusive wristbands and that personal data is shared with an overseas company, without any choice in the matter. Initially there was a form of segregation with the issue of colour coded wristbands for those eligible for concessions. We urge you to consider the option of the plastic cards for swimmers who object to this intrusiveness and no data passed to LoyLap. Data protection principles require you

to minimise what data you retain/process to that which is essential, and not to hold on to data or any longer than strictly necessary. It should be possible to purchase a season ticket via a paper form and with cash, providing no phone or email details if preferred and to receive a plastic card in return.

7. The odd amounts for day tickets in 2021/22, and no change given, appear designed to make cash payment as difficult as possible, in the hope that those who pay cash will cease to use the ponds.
8. Fortifying the ponds to prevent unauthorised access, including the non-bathing ponds will ultimately be futile, despite your indication of [season ticket revocation](#) for anyone found to have done so. The City's new charging regime will mean that swimmers will always find a way in and the Heath cannot be turned into an armed camp. Furthermore swimmers will continue to experiment with unsupervised open water elsewhere, with potential safety consequences. This could all have been avoided with a more constructive approach to charging being taken in March 2020.
9. You continue to refer to a Support Scheme as though it actually exists. The list of concessions (which we had to update for you) is not a support scheme. Work to link up with organisations working with marginalised groups seems very little further forward. At most you appear to have held discussions with Pro-Active Camden but we cannot find out online what they actually do. This support scheme should have been in place in time for re-opening in 2020. It also needs to extend beyond Camden. What on earth does *"This group has an emerging vision of a river of connections flowing through Camden from Hampstead Heath to Kings Cross, much like the river Fleet"* actually mean? Two thirds of our survey respondents were from outside Camden, a significant proportion from Haringey and Islington.
10. You refer to "Updating the Swimming Regulations" during 2021/22, and this sounds significant. What is this about and who are you seeking to exclude now?
11. If Coronavirus restrictions can be ended this summer we expect to see online booking and capped numbers (other than the usual maximum bather loads) removed altogether, along with stewards at the gate. **Please confirm that is what you will do.** The ponds cannot be allowed to continue as an exclusive club once the public health restrictions are lifted.
12. You have indicated you are reverting to Eventbrite for bookings, and that the phone line number will be 020 7332 3779. Once we have sufficient detail including links our members will be notified.
13. We wish to see the detailed income and expenditure figures you refer to in order to check the maths.

29 March 2021
By email

Feedback received from the Highgate Lifebuoys

Applied Charges:

No. 51 - As you know I am against the compulsory charges at the Ponds, but I am glad that there are Season Ticket options now available, so please could these be made permanent.

No. 52 - I am not happy that the prices have already increased, but I am glad that the cash payment option has been retained, so please keep this as a permanent option.

Looking forward to the 2021 Summer Swimming Season:

No. 60 - I think that it is only fair that wristbands have been automatically extended by the number of days lost during the Third Lockdown. It says that Season Ticket sales are resumed on 10 March 2021, but I think that all Season Ticket options should be made available to buy throughout the year, so could this option please be made available?

No. 63 - I am glad that the dedicated telephone booking line is still in place, as I know that several of our Highgate Lifebuoys rely on this as their only booking option, so please could you keep this as a permanent fixture.

No.64 - As I mentioned in No.63, I know that several of our Highgate Lifebuoys rely on the telephone booking line as their only booking option, but also that they very often cannot get through, so it would be good if the telephone booking line opening hours could please be extended.

No. 68 - Free & Discounted Swimming: There are a lot of mental health problems that have arisen due to the current COVID-19 climate, so I think that it would be good to work with relevant mental health organisations, to facilitate free and discounted swims to help to improve the mental health and wellbeing of their patients.

No. 69 - Season Ticket: I think that it is a very good idea to have the option for Season Tickets to be realigned. I do also really like the idea of having a 5 month Winter Season Ticket and a 7 month Summer Season Ticket for those who do not wish to swim for the whole year and so would not need a full year Season Ticket. I think that the 12 month Season Ticket should definitely be retained, especially as there were a lot of very unhappy swimmers when the Season Ticket was suspended last year, so please please retain it and make it a permanent option. As I mentioned in No.60, I understand that the Season Tickets are only available to buy at certain times of the year, but I think that they should be available to buy throughout the year, so please could this option be made available?