

Background

The Education and Care Services National Regulations require approved providers to ensure their services have policies and procedures in place for managing water safety, including safety during any water-based activities.

According to Kidsafe (the recognised authority on the prevention of injuries in children), drowning continues to be one of the main causes of fatalities of Australian children. Every year several children are killed and hundreds more are rescued from near drowning situations. Non-fatal drowning incidents are also of great concern as they can have potential long-term effects, including brain damage and permanent disability. (ACECQA Water Safety – Policy Guidelines)

Children's access to clean water for drinking and for washing their hands is important for their health and wellbeing. In addition, access to water play affords children the opportunity for open-ended, exploratory and sensory play which contributes to their development and learning. It also develops environmental awareness.

The most common factor in childhood drowning is lack of supervision. A child can drown in as little as a few centimeters of water. Items such as nappy buckets, sinks, pet drinking bowls, ponds, pools, water features and water tanks are potential drowning hazards. Accordingly, their access to water requires effective management and the highest level of supervision.

Policy statement

This policy outlines the Services approach to water safety so that children remain unharmed and healthy and applies at the Service and during excursions. Safety and supervision of children are the highest priority when children have access to water. The policy covers hot water, drinking water, hygiene practices with water, and water play. It also includes safe storage of equipment used for water play.

Strategies and practices

- The *Water Safety Policy* will be kept current and accessible to families, educators, students, and volunteers.
- At enrolment, the Services *Water Safety Policy* is explained to parents.
- On induction, the Services *Water Safety Policy* is explained to educators, students, and volunteers, and key information is revisited bi-annually to assist managers, coordinators, and educators to fulfil their roles effectively.
- Families are provided with water safety information including water safety in the home and the availability of learn-to-swim programs in the local community.
- Families attending an excursion where water has been identified as a risk are provided with the Services *Water Safety Policy* and their responsibilities are explained. A copy of the relevant risk assessment is also provided.

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- Sunkids Management have developed a Water Safety Checklist which is completed regularly during monitoring visits to ensure procedures are implemented and educator's knowledge is comprehensive.
- Risk assessments are developed as required for all water based activities, any water hazards, and excursions. Risk assessments detail all potential hazards and the required actions to ensure children's safety and wellbeing. Risk assessments are completed by the Services educators and Nominated Supervisor and are reviewed by Sunkids Management before being published. Risk assessments are reviewed annually or sooner if required.
- Children are closely supervised at all times they are involved in water play or are near water. They are never left alone near water. Educators take children's ages into consideration when planning and initiating water play experiences.
- Adequate supervision will vary depending on children's age and/or ability when engaging with water elements or within water based experiences. Supervision may need to be enhanced dependent on the experience and children present. Supervision will be discussed with the Nominated Supervisor or Responsible Person and regularly evaluated.
- Educator to child ratios are maintained through all water play experiences and supervision points are amended where required to ensure adequate supervision remains throughout the play environment.
- Cardiopulmonary Resuscitation (CPR) posters are displayed prominently throughout the Service, and where water play is set up.
- A minimum of one educator holding the required first aid qualification will be working directly with children at all times. Sunkids encourage all educators to hold the required first aid qualification to ensure the provision of high quality care.
- Educators intentionally teach children about staying safe in and around water within the educational program and annual incursions are arranged with local swim school personnel to educate children on water safety.
- Specific water safety issues are discussed in team meetings.
- Children have ready access to clean drinking water at all times and are regularly offered water throughout the day.
- The use of the Services raised river run system has been risk assessed and a procedure is accessible for all staff. For further information see *Raised River Run Procedure* and *Raised River Run Risk Assessment*.
- The use of the Services water play area has been risk assessed and a procedure is accessible for all staff. For further information see *Water Play Area- Mermaid Waters Procedure* and *Water Play Area – Mermaid Waters Risk Assessment*.
- The water play area at the service is in an area that can be fenced off, when supervision cannot be adequately met. The water play area consists of 6 water spurts built into the ground which are activated by staff, running for 30 seconds intervals. The water play functions are controlled by service staff, with the control panel access located on the wall just outside the play area.

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- The water in troughs and containers used for water play is kept at safe levels for children, and at weights that educators can move or secure according to WHS guidelines for safe lifting.
- Children are discouraged from drinking any water used in the play activities.
- All water troughs and containers are emptied and hygienically cleaned at the end of each water play activity, allowed to dry thoroughly in the sun to prevent the build-up of potentially harmful bacteria such as mould, and then stored in an area inaccessible to children.
- Educators and children wash and dry their hands after each water play activity to reduce the risk of cross-infection.
- Buckets used for cleaning are kept out of children's reach, emptied immediately after each use and stored in an area inaccessible to children.
- The Services fences and gates meet regulatory requirements, and educators ensure that items that could be used to scale the fence are kept away from the fence.
- Children may require access to bath and/or shower facilities during their time at the Service. In these situations, one staff member will have sole responsibility of the assistance and supervision of the child whilst using the bath and/or shower facilities. This will not impact the supervision level of the other children throughout the Service at the time of the event.
- The Nominated Supervisor completes an Excursion Risk Management Plan prior to every excursion. The Excursion Risk Management Plan is sent to Sunkids Management to be reviewed and approved.
- Water for pets is changed regularly and is inaccessible to children unless accompanied by an educator.
- Parents are asked to provide a spare set of clothing for their child in the event that the child engages in water play and becomes uncomfortably wet.
- In the event of a water hazard arising educators notify the Nominated Supervisor or Responsible Person, who lodges the hazard on UpKeep and contacts Sunkids Management to have the issue rectified as soon as practicable. Until that time the hazard is communicated to all educators and appropriate supervision practices are implemented to ensure children's safety.
- In the event of an incident occurring surrounding water play or a water hazard, educators immediately notify the Nominated Supervisor or Responsible Person. The child's family or guardians are contacted as soon as practicable within 24 hours of the incident occurring. In the event of a serious incident occurring Sunkids Management are notified as soon as practicable and a notification is logged with the Regulatory Authority within 24 hours of the incident occurring.
- After an incident has occurred educators will review current practices and reflect on improvements and changes to be made to ensure children's safety to reduce the risk of future incidents occurring.

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- Water conservation is embedded in the Services practices;
 - Only the amount of water required to undertake programmed water play is used.
 - Water used in water play is emptied onto gardens.
 - Water play is discontinued during water restrictions, and the reasons explained to the children.
 - Educators encourage children to turn taps off to avoid wastage.
 - Water conservation posters are displayed in bathrooms.
- Educators model and intentionally teach children water conservation and provide parents with information to continue the Services conservation message at home. Refer to the Services Environmental Sustainability Policy.
- Children do not wade or swim while at the Service.
- Adults consume hot drinks in areas not accessed by children, including excursions.
- The temperature of hot water accessible to children is maintained at 38 Degrees Celsius or below in accordance with the AS 3500.4. Thermostatic valves are tested and serviced annually by a plumber, and this action is recorded.

Additional safe practices for babies

- To ensure that babies and toddlers are never left unattended in the bath.

Responsibilities of parents

- To provide a spare set of clothing for their child in the event that the child engages in water play and becomes uncomfortably wet.
- To continue the Services water conservation message at home.

Roles and Responsibilities

Roles	Responsibilities
Approved Provider	<ul style="list-style-type: none"> • Must keep a child safe environment. • Ensure there is adequate supervision provided given the ages and developmental needs of children undertaking water activities (including ratios) • Ensure risk assessments are undertaken and water hazards and risks associated with water based activities are taken into consideration. • Ensure that educators and staff are continually monitoring and managing the area in and around a water hazard so that it cannot be accessed by children. • Ensure that at least one educator, staff member or nominated supervisor who holds a current approved first aid qualification is in attendance at all times that children are being educated and cared for by the service. • Take reasonable steps to ensure that the policy and procedures are current, reviewed regularly, and communicated to educators, staff and stakeholders. • Take reasonable steps to inform and support educators and staff regarding their responsibilities in implementing the policy and procedures at all times. • Take reasonable steps to ensure that nominated supervisors, educators, staff and volunteers follow the policy and procedures • Ensure copies of the policy and procedures are readily accessible to nominated supervisors, educators, staff and volunteers, and available for inspection. • Notify families at least 14 days before changing the policy or procedures if the changes will: <ul style="list-style-type: none"> - Affect the fees charged or the way they are collected or - Significantly impact the service's education and care of children or Significantly impact the family's ability to utilise the service
Nominated Supervisor/Responsible Person	<ul style="list-style-type: none"> • Ensure there is adequate supervision provided given the ages and developmental needs of children undertaking water activities (including ratios) • Inform families about water safety practices at the service • Ensure first aid and CPR qualifications and requirements are met at all times • Ensure that at least one educator, staff member or nominated supervisor who holds a current approved first aid qualification is in attendance at all times that children are being educated and cared for by the service • Undertake risk assessments for excursions near water • Ensure that educators and staff are continually monitoring and managing the area in and around a water hazard so that it cannot be accessed by children • Take reasonable steps to ensure that the policy and procedures are current, reviewed regularly, and communicated to educators, staff and stakeholders • Take reasonable steps to ensure that the policy and procedures are current, reviewed regularly, and communicated to educators, staff and stakeholders • Take reasonable steps to inform and support educators and staff regarding their responsibilities in implementing the policy and procedures at all times • Guide and mentor educators and staff to be able to follow the policy and procedures

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Educators	<ul style="list-style-type: none"> • Reinforce water safety messages within the children's education program • Make sure water hazards are managed as outlines in your procedures, e.g. water trough is emptied and packed away as soon as play has ended • Ensure that the area in and around a water hazard is continually monitored and managed so it cannot be accessed by children • Ensure there is adequate supervision provided given the ages and development needs of children undertaking water activities, or if they are near a water hazard (including above ratios if necessary) • Ensure buckets that contain liquids are not accessible to children • Empty, safely cover or make inaccessible to children all water containers when they are not in use, e.g. mop buckets, nappy buckets, bathtubs, water troughs, per water containers • Ensure water troughs or containers for water play will be supervised at all times and containers or troughs will be emptied after use
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Procedures and forms

- Excursion Risk Management
- Supervision Guidelines
- Administration of First Aid Procedure
- Dry Creek Bed and Water Pump Procedure

Links to other policies

- Animals and Pets at the Service Policy
- Child Safe Environments Policy
- Enrolment and Orientation Policy
- Educational Program Policy
- Environmental Sustainability Policy
- Excursion Policy
- Incident, Injury, Trauma and Illness Policy
- Supervision Policy

Links Education and Care Services National Regulations 2011, National Quality Standard 2011

Regs	25	Additional information about proposed education and care service premises
	100	Risk assessment must be conducted before excursion
	101	Conduct of risk assessment for excursion
	168	Education and care service must have policies and procedures
	170	Policies and procedures to be followed
	171	Policies and procedures to be kept available
	172	Notification of change to policies or procedures

QA	2.1.1	Each child's wellbeing and comfort is provided for, including appropriate opportunities to meet each child's need for sleep, rest and relaxation
	2.1.2	Effective illness and injury management and hygiene practices are promoted and implemented
	2.2.1	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard
	3.1.1	Outdoor and indoor spaces, buildings, fixtures and fittings are suitable for their purpose, including supporting the access of every child
	3.1.2	Premises, furniture and equipment are safe, clean and well maintained
	3.2.1	Outdoor and indoor spaces are organised and adapted to support every child's participation and to engage every child in quality experiences in both built and natural environments

3.2.2	Resources, materials and equipment allow for multiple uses, are sufficient in number, and enable every child to engage in play-based learning
3.2.3	The service cares for the environment and supports children to become environmentally responsible
6.1.1	Families are supported from enrolment to be involved in the service and contribute to service decisions
6.1.3	Current information is available to families about the service and relevant community services and resources to support parenting and family wellbeing
7.1.3	Roles and responsibilities are clearly defined, and understood, and support effective decision-making and operation of the service

Sources

- ACECQA: <https://www.acecqa.gov.au/resources/policy-guidelines/water-safety-policy-guidelines> accessed 24 June 2025
- Early Years Learning Framework V2.0, 2022
- Education and Care Services National Regulations 2023
- Guide to the National Quality Standard, 2024

Further reading and useful websites

- Kidsafe QLD – <https://www.kidsafeqld.com.au/water-safety/> accessed 24 June 2025
- Kids Alive – <https://kidsalive.com.au/> accessed 24 June 2025
- Royal Life Saving – <https://www.royallifesaving.com.au/> accessed 24 June 2025
- National Health and Medical Research Council – <https://www.nhmrc.gov.au/> accessed 24 June 2025

Key Terms

Term	Meaning	Source
ACECQA – Australian Children’s Education and Care Quality Authority	The independent national authority that works with all regulatory authorities to administer the National Quality Framework, including the provision of guidance, resources and services to support the sector to improve outcomes for children.	
Adequate Supervision	Means: <ul style="list-style-type: none"> - Knowing where children are at all times and monitoring their activities actively and diligently - An educator can respond immediately, particularly when a child is distressed or in a hazardous situation Supervision will vary depending on age and/or ability of children. Enhanced supervision may be required dependent on water elements and children’s ages and/or abilities.	Guide to the NQD (Operational Requirements – Quality Area 2)
Approved First Aid Qualifications	A qualification that includes training in the matters set out below, that relates to and is appropriate to children and have been approved by ACECQA and published on the list of approved first aid qualifications and training on the ACECQA website. Matters are likely to include: Emergency life support and cardio-pulmonary resuscitation; convulsions; poisoning; respiratory difficulties; management of severe bleeding; injury and basic wound care; and administration of an auto-immune adrenalin device.	National Regulations (Regulation 136)
Risk Assessment	A systematic process of evaluating the potential likelihood and consequences of risks that may be involved in a projected activity or undertaking.	

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Serious Incident	<p>For the purposes of the definition of serious incident in section 5(1) of the Law, each of the following is prescribed as a serious incident:</p> <ul style="list-style-type: none"> (a) The death of a child – <ul style="list-style-type: none"> (i) While that children in being education and cared for by an education and care service; or (ii) Following an incident occurring while that child was being educated and cared for by an education and care service; (b) Any incident involving serious injury or trauma to a child occurring while that child is being educated and cared for by an education and care service – <ul style="list-style-type: none"> (i) Which a reasonable person would consider required urgent medical attention from a registered medical practitioner; or (ii) For which the child attended, or ought reasonably to have attended, a hospital; (c) Any incident involving serious illness of a child occurring while that child is being educated and cared for by an education and care service for which the child attended, or ought reasonably to have attended, a hospital; (d) Any emergency for which emergency services attended; (e) Any circumstance where a child being educated and cared for by an education and care service – <ul style="list-style-type: none"> (i) Appears to be missing or cannot be accounted for; or (ii) Appears to have been taken or removed from the education and care service premises in a manner that contravenes these Regulations; or (iii) Is mistakenly locked in or locked out of the education and care service premises or any part of the premises. 	National Regulations (Regulation 12)
Hazard	A source of potential harm or a situation that could cause or lead to harm to people or property. Work hazards can be physical, chemical, biological, mechanical or psychological.	https://www.ecrh.edu.au/docs/default-source/resources/ipsp/work-health-and-safety-in-education-and-care-services.pdf?sfvrsn=8
Water Hazard	<p>Any water body that poses a potential drowning risk to children and could include:</p> <ul style="list-style-type: none"> - Large bodies of water, such as rivers, creeks, dams, ponds, swimming pools, jetted bathtubs (or jacuzzis), in-ground spas, above ground portable spas (or hot tubs) or any container with poor drainage that allows water to pool - Smaller bodies of water, such as baths, nappy buckets and pet water containers. 	https://www.communities.wa.gov.au/media/1727/pools-and-water-hazards-in-fdc-c-ris.pdf

Policy review

The Service encourages staff and parents to be actively involved in the annual review of each of its policies and procedures. In addition, the Service will accommodate any new legislative changes as they occur and any issues identified as part the Service's commitment to quality improvement. The Service consults with relevant recognised authorities as part of the annual review to ensure the policy contents are consistent with current research and contemporary views on best practice.

Version Control

Version	Date Reviewed	Approved By	Comments/Amendments	Next Review Date
1	25 March 2024	Tiffany Boeske	Reviewed policy to suit Sunkids Mermaid Waters	March 2025
2	24 June 2025	Gen Mahaki	Reviewed policy Updated sources and further readings	June 2026