



WATER SAFETY POLICY & PROCEDURE

Policy Statement

At Fun 4 U Helensburgh, children's health, safety, and wellbeing are our highest priorities, especially in and around water. While our OSHC service does not include swimming pools, we recognise that everyday water items and activities (like mop buckets, taps, water play trays, or school water troughs) still present a hazard. Our Water Safety Policy ensures that water-based experiences and environments are always actively supervised and safe, and that children learn and explore in ways that promote enjoyment without compromising safety. Fun 4 U also has water safety education embedded in our program to help children and young people develop safety awareness.

Background

Under the [Education and Care Services National Regulations](#) (Regulation 168(2)(a)(iii) and Regulation 170), every approved provider must maintain water safety policies and procedures—including for water hazards such as hot water, drinking water, buckets, sinks, and containers, as well as any water-based excursions or activities. This policy also includes safe storage of equipment used for water play. Drowning remains one of the leading causes of unintentional death or serious injury among Australian children. Even just a few centimeters of standing water can pose a risk. According to [Kidsafe](#), everyday items such as mop buckets, pet bowls, portable pools, or water troughs can become water hazards. Additionally, lack of supervision is the most common contributor to water-related accidents. At Fun 4 U Helensburgh, we believe that it is a child's right to experience water play to allow for open-ended exploratory and sensory play, however this must be balanced with rigorous safety precautions. Furthermore this policy aligns with the National Quality Standard's Quality Area 2 (2.2), which emphasises protection from harm and hazard through adequate supervision and safe physical environments.

Legislative Requirements and links to the National Quality Framework

QUALITY AREA 2: CHILDREN'S HEALTH AND SAFETY		
2.1.1	Health practices and procedures	Effective illness and injury management and hygiene practices are promoted and implemented.
2.2	Safety	Each child is respected.
2.2.1	Supervision	At all times, reasonable precautions and adequate supervision ensure children are protected from harm and hazard.
2.2.2	Incident and emergency management	Plans to effectively manage incidents and emergencies are developed in consultation with relevant authorities, practiced and implemented.
QUALITY AREA 7: GOVERNANCE AND LEADERSHIP		
7.1.3	Roles and responsibilities	Roles and responsibilities are clearly defined, and understood, and support effective decision making and operation of the service.

EDUCATION AND CARE SERVICES NATIONAL LAW AND NATIONAL REGULATIONS	
S. 165	Offence to inadequately supervise children
S. 167	Offence relating to protection of children from harm and hazard
12	Meaning of a serious incident
101	Conduct of risk assessment for excursions
115	Premises designed to facilitate supervision
122	Educators must be working directly with children to be included in ratios
168(2)(a)(iii)	Education and care service must have policies and procedures in relation to- Water safety, including safety during any water-based activities
170	Policies and procedures to be followed
171	Policies and procedures to be kept available
172	Notification of change to policies or procedures
176	Time to notify certain information to Regulatory Authority

Definitions of Key Terms used in the Policy

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.	ACEQA
Adequate Supervision	Means: • An educator can respond immediately, particularly when a child is distressed or in a hazardous situation • Knowing where children are at all times and monitoring their activities actively and diligently.	Guide-to-the-NQF-March-2023.pdf
Approved first aid qualifications	A qualification that includes training in the matters set out below, that relates to and is appropriate to children, and has been approved by ACECQA and published on the list of ACECQA’s approved first aid qualifications and training. 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.	ACEQA – Water Safety Policy Guidelines
Risk Assessment	A systematic process of evaluating the potential likelihood and consequences of risks that may be involved in a projected activity or undertaking.	ACEQA – Water Safety Policy Guidelines
Serious Incident (Reg 12)	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: a. The death of a child— i. while that child is being educated 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— 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; Example: A broken limb. 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; Example: Severe asthma attack, seizure or anaphylaxis reaction. 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— i. appears to be missing or cannot be accounted for; or	ACEQA – Water Safety Policy Guidelines

	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.	
Hazard	Situations or things that have the potential to harm a person.	ACEQA – Water Safety Policy Guidelines
Water Hazard	Any water body that poses a potential drowning risk to children and could include: • 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.	Guide-to-the-NQF-March-2023.pdf

Principles that inform the policy

What are Water Hazards?

The Education and Care Services National Regulations make reference to ‘water hazards,’ however, the term is not specifically defined. For the purpose of this policy, our OSHC Service defines a water hazard as **any object or environment that can hold at least 5cm of water and is large enough to cover a child’s nose and mouth, creating a potential risk of drowning or injury.**

Examples of water hazards include, but are not limited to:

- Large bodies of water such as swimming pools, portable pools and spas, dams, creeks, rivers, and areas of pooling water
- Baths, jetted bathtubs, or Jacuzzis
- Fishponds and decorative water features (e.g., fountains, wishing wells)
- Buckets, mop buckets, sinks, and basins
- Animal drinking containers or troughs
- Paddling pools, clam shells or other water play containers
- The beach or shoreline areas

By identifying and managing these hazards, our Service aims to minimise risks and ensure the safety and wellbeing of all children in our care.

Definition of 'Body of Water'

For the purposes of this policy, a body of water refers to any location, structure, or container that is capable of holding water at a depth that may pose a risk of drowning to a child. This includes, but is not limited to:

- Natural water environments such as oceans, beaches, rivers, lakes, creeks, dams, and wetlands.
- Man-made water environments such as swimming pools, wading pools, spas, fountains, ponds, water troughs, fish ponds, or water features.
- Temporary or incidental water hazards such as water in buckets, sinks, basins, nappy buckets, bathtubs, paddling pools, clam shells, water play troughs, containers used for play or animal care, and collected rainwater in play areas, sandpits, or garden equipment.

A "body of water" is therefore defined as any accumulation of water, whether permanent, temporary, natural, or artificial, that has the potential to present a drowning hazard to a child.

Implementation of Supervision or Procedures

Under the Education and Care Services National Regulations, the approved provider is required to have policies and procedures in place to manage water safety, including water-based activities, and to take all reasonable steps to ensure these are consistently implemented. According to [Kidsafe](#), drowning is one of the leading causes of unintentional death among Australian children. Each year, a number of children tragically lose their lives and hundreds more are rescued from near-drowning incidents. Non-fatal drowning is equally concerning, as it can result in serious long-term health impacts, including brain injury and permanent disability. The most common contributing factor to childhood drowning is inadequate supervision. It is important to remember that a child can drown in just a few centimetres of water. Everyday items such as nappy buckets, sinks, pet bowls, ponds, pools, water features, and water tanks can all pose significant drowning risks.

At Fun 4 U OSHC, children's safety is central to our daily practice. We are committed to providing effective, consistent, and active supervision at all times, ensuring educator-to-child ratios are always met in line with the National Regulations. Specifically, we operate under



Regulations 122 and 123, which require one educator for every 15 school-aged children. Educators apply active supervision strategies within the Service, during excursions, and when transporting children, always taking into account children's ages, abilities, additional needs, and the supervision required for specific activities (Regulation 115).

In compliance with the National Law and Regulations:

- Only educators who are actively working with children are included in ratio calculations (Regulation 122).
- No child is ever left alone with a visitor to the Service (Regulation 166).
- Accurate staff rosters and sign-in/sign-out records are maintained to verify that correct staffing levels and supervision are in place at all times.
- A visitor record is kept for every person attending Fun 4 U OSHC (Regulation 165).

For further information, please also refer to our Code of Conduct, Providing a Child Safe Environment Policy, Supervision Policy, and Excursion and Incursion Policy, which together outline our comprehensive approach to ensuring every child is safe, supported, and supervised at all times.

Roles and Responsibilities of Staff

THE APPROVED PROVIDER / NOMINATED SUPERVISOR / MANAGEMENT WILL:

- comply with all obligations under the Education and Care Services National Law and National Regulations, and ensure water safety practices are embedded in daily operations
- ensure all educators, staff, students, and volunteers are familiar with and follow this policy and its associated procedures and are also advised on where to locate this policy.
- complete comprehensive risk assessments that identify, document, and mitigate risks associated with water hazards and water-based play/activities
- ensure water hazards and water play are always subject to active and heightened supervision practices, including:
 - direct and constant visual monitoring of children
 - careful positioning of educators to cover all areas
 - continuous scanning and movement around the environment
 - observing play, anticipating behaviours, and intervening promptly where required

- adjusting adult-to-child ratios to ensure safety, particularly during water play or excursions
 - ensuring no child is ever left unattended in proximity to water
- provide a comprehensive induction, ongoing training and guidance to educators, staff, and families on water safety awareness, supervision strategies, and the importance of vigilance around water. Including child safety, CPR and *Water Safety Policy*.
- ensure health and safety practices include safe storage, handling, and disposal of water and water play equipment
- ensure that premises adjacent to, or providing access to, water hazards that cannot be adequately supervised (e.g. dams, swimming pools, creeks) are made inaccessible by child-resistant barriers or fencing
- regularly inspect barriers/fences to ensure there are no climbable objects (e.g. pot plants, chairs, boxes) near the fence line that would allow children to gain access to water hazards
- ensure a detailed risk assessment is completed prior to any excursion or incursion near water, considering both the environment and planned water activities, before approval is granted (Reg 101).
- ensure at least one educator with current, approved first aid training (Reg. 136, updated within the past three years) is in attendance at all times
- ensure at least one educator with up-to-date CPR training (renewed annually) is present at the Service at all times
- display a Cardiopulmonary Resuscitation (CPR) guide near any swimming pool, wading pool, or water play area.
- ensure hot water is inaccessible to children, including hot drinks used by educators, staff, or families
- notify the regulatory authority within 24 hours of becoming aware of any serious incident involving water.
- Notify the parents or guardians of the child as soon as possible but within 24 hours if their child is involved in an incident/accident at the service or while under Fun 4 U's care.
- conduct a review of practices following any water-related safety incident including an assessment of areas for improvement within the policy and associated procedure.

EDUCATORS WILL:

- provide active, direct supervision of children during any water-based activity, ensuring:
 - no child is ever left unattended near water
 - constant monitoring and scanning of the area is maintained
 - educators move around the environment to eliminate blind spots
 - play is observed closely to anticipate and prevent unsafe behaviours
- ensure that any body of water with a depth greater than 3cm is inaccessible to children at all times and is guarded with an effective barrier at all times (child proof fence/ grate over the water)
- conduct daily safety inspections of the premises to identify and manage water hazards. If a hazard is found, a risk assessment will be completed and children will be excluded from the area until it is made safe
- use water activities safely and intentionally as part of the planned educational program, ensuring weather and conditions are appropriate
- encourage children's natural curiosity by allowing safe experimentation with water, sand, and materials, while teaching about water safety
- incorporate water safety education into the program to build children's awareness and confidence around water
- monitor all taps accessible to children to ensure they are securely turned off when not in use
- cover or store all water containers securely so they are inaccessible to children
- immediately empty and safely store wading pools after each use to prevent water collection
- check for and empty water collected in containers, play equipment, or garden areas after rainfall or watering
- ensure water troughs are always used on a stand to raise them off the ground and are emptied after each use
- supervise children so they remain standing on the ground (not climbing) when using water troughs
- keep buckets of water used for soaking toys, laundry, or cleaning out of children's reach
- ensure children do not drink from water play containers for health and hygiene reasons

- ensure staff-only areas (e.g. laundry, storerooms) remain inaccessible to children with signage and secure closures
- embed teaching moments about water safety into daily practice, helping children understand safe behaviour around water
- follow the *Administration of First Aid Policy* after any incident involving a water-based activity, including contacting 000 if a child is found unresponsive or has inhaled water
- reflect on practice and share strategies during staff meetings to maintain and improve child safety around water.

Water Safety in Relation to Excursions

When planning excursions near water, our OSHC Service recognises that water presents an increased risk to children's health and safety. To manage this risk, we implement strict procedures to ensure all children are kept safe at all times:

- A comprehensive risk assessment (Reg 101) is conducted prior to every excursion, specifically identifying and addressing potential water hazards such as rivers, beaches, lakes, fountains, ponds, or swimming pools. The assessment outlines strategies to minimise risks, including increased supervision, restricted access zones, and emergency planning.
- Active supervision is maintained at all times, with additional educators rostered when excursions involve proximity to water. Where required, higher educator-to-child ratios are implemented to ensure children's safety.
- Children are never permitted to swim or enter bodies of water unless the excursion has been risk-assessed, approved by management, and written parental authorisation has been obtained. Any planned water-based activity (such as wading or water play) must be clearly outlined in excursion documentation.
- Educators are positioned to provide line-of-sight supervision near water and remain vigilant, scanning and moving to eliminate blind spots.
- Where possible, excursions near water hazards will include physical barriers (such as fencing, cordoned areas, or clearly defined boundaries) to prevent unsupervised access.
- At least one educator with current first aid, CPR, anaphylaxis and asthma management training will attend all excursions, in line with Regulation 136.

- A CPR chart will be carried on excursions where children are close to a body of water, as part of the emergency response kit.
- Families are informed of all water-related risks in excursion permission forms, and their written consent is required before children can participate.
- In the event of an incident or near miss involving water, educators will follow the Service's Emergency and Incident Management Procedures, and the Regulatory Authority will be notified within 24 hours if a serious incident occurs (Regulation 176).

Operational Safety

- Water tanks will display clear "Do Not Drink" signage, and educators will supervise children in these areas to ensure tank water is not accessed for drinking purposes.
- Educators will engage children in age-appropriate discussions about the difference between tank water and safe drinking water, supporting their understanding of health and safety.
- Hot water systems accessible to children will be maintained at a maximum temperature of 45°C, in line with Australian Standard AS 3498, and tested annually to ensure compliance.
- Hot beverages are not to be consumed by educators, students, or visitors in areas where children are present to prevent accidental scalding.
- Pet water bowls at the Service will be refreshed daily and only accessible to children under educator supervision to ensure health and hygiene are maintained.

Important:

Parents will be notified as soon as practicable but within 24 hours if their child is involved in an incident/accident at the OSHC Service or while under Service care. Details of the incident/accident will be recorded on an *Incident, Injury, Trauma and Illness Record*.

Reg. 176: If the incident/accident, situation or event presents imminent or severe risk to the health, safety and wellbeing of the child or if an ambulance was called in response to the emergency (not as a precaution) the regulatory authority will be notified within 24 hours. Educators will follow emergency procedures and contact emergency Services if a child appears to be missing or unaccounted for or is involved in a serious incident or accident.

Induction and Ongoing training

At Fun 4 U OSHC, we recognise that consistent professional learning is essential to ensuring the safe and responsible use of digital technologies, online environments, and water safety practices.

Induction Training

- All new educators, staff, students and volunteers will participate in a comprehensive induction program before commencing duties.
- The induction will include training on:
 - the Safe Use of Digital Technologies and Online Environments Policy and Procedure
 - the Water Safety Policy and Procedure
 - child protection and mandatory reporting obligations
 - active supervision strategies, including online and physical environments
 - privacy and confidentiality requirements.
- Induction will also include familiarisation with the National Quality Framework (NQF), relevant sections of the Education and Care Services National Law and Regulations, and the National Principles for Child Safe Organisations.

Ongoing Training and Information Sharing

- Educators and staff will participate in annual refresher training on safe technology practices, water safety, supervision, and child protection.
- Additional training sessions will be provided when policies are updated, following incidents, or when new digital platforms, equipment, or practices are introduced.
- The service will engage in regular team meetings to review procedures, discuss challenges, and share professional learning related to child safety, digital use, and supervision strategies.
- Professional development opportunities will be sourced through ACEQA, the NSW Regulatory Authority, Kidsafe, and the eSafety Commissioner, ensuring our practices remain current and evidence-based.
- All training will be recorded and monitored to ensure compliance and to identify further learning needs.

We are committed to fostering a culture of continuous improvement where staff feel confident, informed, and supported in their role of keeping children safe across both physical and digital environments.

Monitoring Evaluation and Review

At Fun 4 U, we proactively monitor updates from ACECQA and Childcare Centre Desktop to ensure our Water Safety Policy remains current and compliant. The policy is reviewed at least annually, in consultation with families, staff, educators, and management, to reflect best practices and evolving regulatory requirements. In addition to this, our policies are made readily available to families within 14 days, on our Facebook page and next to our sign in and out register we have a poster with a QR code that links to all of our policies. (Reg 171 & 172)

Links to other policies/ resources

Related Polices	Child Care Centre Desktop Polices
Administration of first aid Policy Emergency and Evacuation Policy Excursions and incursions Policy Family Communication Policy Incident, Injury, Trauma and Illness Policy Providing a Child Safe Environment Policy Sun Protection Policy Supervision Policy	Water Safety Policy Water Safety Procedure Providing a child safe environment

Sources

- I. Australian Children's Education & Care Quality Authority. (2025). [Guide to the National Quality Framework](#)
- II. ACECQA. (2023). [Policy and procedure guidelines- Water Safety Guidelines](#)
- III. Early Childhood Australia Code of Ethics. (2016).
- IV. Education and Care Services National Law Act 2010. (Amended 2023).
- V. [Education and Care Services National Regulations](#). (Amended 2023)
- VI. KidSafe (2021). Water Safety. <https://kidsafe.com.au/water-safety/>
- VII. National Health and Medical Research Council (NHMRC): www.nhmrc.gov.au

Record of services' compliance (Reg 167)

Date Created: February 2015

Date Reviewed by Fun 4 U: 18/09/2025

Childcare Centre Desktop Policy Update: September 2025

This Policy Follows ACEQA: [Child Safety | ACECQA](#)