

Water Safety Policy and Procedure

POL2-P23

1. Purpose

This policy and procedure sets out how Affinity Education Group (Affinity) manages water safety to protect children from harm while they are enrolled in an Affinity service.

Affinity's approach to managing risks in and around water across all service environments provides clear direction on expectations for supervision and risk assessment in relation to water play, pools or water features, excursions near water, hot water, drinking water, and nearby or unexpected water hazards. It also outlines how these requirements are implemented in practice.

This supports Affinity's responsibilities under the Education and Care Services National Law and Regulations, including requirements to have and follow water safety policies and procedures, and aligns with the National Quality Standard to ensure children's safety, health, and wellbeing are protected.

2. Scope

This policy and procedure applies to all educators, staff, students, volunteers, contractors, families, and visitors across all Affinity services, centres, and programs when children are in care and are in or near water, or where water may present a safety risk. This includes everyday routines, water play experiences, pools or water features, nearby water hazards, and excursions involving water.

This must be read together with the [POL2-P6 Excursions Procedure](#), [POL3-P1 Providing a Child Safe Environment Procedure](#), relevant risk assessment documents, and applicable ProMapp processes.

This does not cover medical treatment or first aid responses following a water-related incident. Medical response and first aid requirements are addressed in the [POL2-P26 First Aid Procedure](#) and the [POL2-P24 Incident, Injury, Trauma and Illness Procedure](#).

3. Definitions

The following definitions support consistent understanding of the terms used in this policy/procedure.

Term	Definition
Active Supervision	Means that an educator can respond immediately, particularly when a child is distressed or in a hazardous situation and knows where children are at all times and monitors their activities actively and diligently
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, inground 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, pet water containers, splash pads and water trolleys.

4. Guiding principles

At Affinity, we believe that child safety is everyone's responsibility. We are committed to upholding the safety, rights and wellbeing of all children and promote a culture of child safety with a zero tolerance approach to child abuse and harm. Affinity ensures the Paramountcy Principle is applied in all aspects of our work. All decisions and actions related to the operation and delivery of education and care services must prioritise children's safety, rights and best interests above all other considerations.

The following principles guide how Affinity approaches water safety across all services, centres, and programs.

- Children's safety and wellbeing comes first** – Children's safety, health, and wellbeing are the highest priority. All decisions about water-related activities and environments are made to prevent harm and keep children safe at all times.
- Active supervision is critical** – Children are actively supervised at all times when they are in or near water. Supervision is planned, maintained, and adjusted to suit children's ages, abilities, and the level of risk present.
- Risks are identified and managed early** – Water-related risks are identified through planning, regular checks, and risk assessment. Hazards are addressed before children access water-based environments or experiences.
- Clear roles and shared responsibility support safe practice** – Everyone has a role in maintaining water safety. Clear expectations and shared responsibility support consistent, safe, and respectful practice across all services and settings.
- Safe environments support learning and play** – Water play and water-based experiences support children's learning and development when they are carefully planned and well supervised. Safety planning allows children to participate with confidence.

These principles underpin all actions described in this policy and procedure and guide professional judgement when decisions are required.

Accountable (Owner)	Chief Risk and Quality Officer	Accountable (Expert)	National Quality Manager
Responsible	All staff, students, volunteers, families	Document Version	V13
Consulted	Policy Committee	Date Approved	May 26
Informed	All staff, students, volunteers, families	Date next reviewed	May 27
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4.1. Risk-aware environmental safety approach

This policy and procedure are informed by a risk-aware environmental safety approach, which guides how the guiding principles are applied in everyday practice.

This approach recognises that children's safety and wellbeing are strongly influenced by their environments, particularly in and around water. Educators remain alert to water-related hazards, including water play equipment, pools or water features, containers that collect water, drains, flooding risks, and nearby water sources. Environments, routines, and experiences are planned and adjusted to reduce risk before harm occurs. Educators actively monitor environments throughout the day and respond to changing conditions, such as weather, rain, water accumulation, or planned water-based activities. Adjustments are made early and calmly, such as emptying or removing water containers, increasing supervision, modifying experiences, or restricting access to water hazards when required.

Through shared responsibility, educators, leaders, and families work together to maintain environments that protect children from water-related harm while supporting safe, meaningful play and learning.

5. Procedures

These procedures support the implementation of the Water Safety Policy and Procedure and are designed to be applied in everyday decision-making. Detailed operational processes, tools, and records are maintained in ProMapp.

5.1. Ensure safe supervision around water

Ensure children are adequately supervised around water, water-related risks are managed in line with legal requirements, and educators remain accountable for maintaining children's safety at all times.

These practices support child safety, wellbeing, supervision, and compliance, and guide consistent decision-making, as set out in the relevant ProMapp process [3.4.08 Manage Water Safety](#).

Key expectations include:

Measure	Responsible	Minimum expectation	Policy/Procedure Reference
Ongoing supervision of children	All staff / Educators	Children are supervised at all times when participating in water play or when near water. Supervision is continuous and not compromised by competing tasks or distractions and adjust supervision based on children's ages, abilities, and the level of risk present	POL2-P25 Supervision Procedure
Direct Contact	All staff / Educators	Educators remain in direct contact and actively monitor children in water-related environments;	
Adequate ratios	All staff / Educators Centre Manager / Nominated Supervisor	Educator-to-child ratios and supervision arrangements reflect the level of water-related risk. Which ensures an educator can respond immediately, particularly when a child is distressed or in a hazardous situation and knowing where children are at all times and monitoring their activities actively and diligently	POL3-P4 Risk Assessment Procedure POL4-P5 Grouping of Children Procedure
Excursions and off-site activities	All staff / Educators Centre Manager / Nominated Supervisor	Supervision meets excursion-specific requirements.	POL2-P6 Excursions Procedure
Education to children	All staff / Educators	Reinforce water safety messages within the children's education program	

Key actions

The key actions below outline the practical steps that must be followed:

- position educators to maintain constant visual and active supervision of children around water;
- ensure supervision arrangements are adjusted for water-related activities and environments; and
- maintain supervision during transitions, setup, and pack-down of water-based experiences.

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5.2. Manage water-related activities and water parks safely

Ensure water-related activities and environments are safe for children, risks are managed in line with legal requirements, and responsibilities for planning and oversight are clear.

These practices support child safety, wellbeing, supervision, and compliance, and guide consistent decision-making, as set out in the relevant ProMapp processes for [3.4.08 Manage Water Safety](#), [3.4.03 Assess and Manage Risk](#), [3.6.24 Plan and Conduct Excursions](#) and [3.6.26 Plan and Conduct Incursions](#).

Key expectations include:

- water-related activities are planned using a documented risk assessment and management approach following [3.4.03 Assess and Manage Risk](#)
- water play equipment, pools, and water features are set up and used in a way that limits water depth and access;
- environmental factors such as weather, rain, and water accumulation are considered before and during activities; and
- activities do not proceed if identified risks cannot be adequately managed.

Measure	Responsible	Minimum expectation	Policy/Procedure Reference
Adequate ratios	All staff / Educators Centre Manager / Nominated Supervisor	Educator to child ratios will be considered after a thorough risk assessment and management plan is completed and reviewed and may be increased depending on the size of the area and age of children using the area. For waterparks: If minimum ratios are not met, the water park will not be used.	POL3-P4 Risk Assessment Procedure POL4-P5 Grouping of Children Procedure
Water requirements	All staff / Educators	Educators will ensure water troughs, buckets, paddle pools or other receptacles for water play are filled to a depth of less than 30cm. Any depth 30cm or deeper requires a barrier such as fencing. These will be emptied when not directly supervised by an educator	
Sun Protection	All staff / Educators / Families	Families will be asked to supply sun safe clothing to be worn in the water park area. Sun protection measures as outlined in the Sun Protection and Extreme Heat procedure will be implemented.	POL2-P14 Sun Protection and Extreme Heat Procedure
Pool requirements	Nominated Supervisor/ Centre Manager	Pools on premises must be in accordance with legislation of the local governing bodies	
Health	All staff/ Educators	Children will be discouraged from drinking the water during water play experiences	

Key actions

The key actions below outline the practical steps that must be followed:

- complete and review risk assessments when planning water-related activities or accessing water environments;
- environments are reassessed after rain, storms, or flooding;
- check that water play equipment, pools, and surrounding areas are set up safely before use;
- adjust, relocate, or cease activities if environmental or water-related risks increase; and
- ensure adequate pack away of resources occur, should any resources no longer be fit for purpose then discard as required.

Exceptions

When minimum safety controls or supervision requirements cannot be met, water-related activities must not proceed and access to the environment must be restricted until risks are reduced.

5.3. Manage environmental water hazards

Ensure environmental water hazards are identified and controlled, risks are managed in line with legal requirements, and educators remain accountable for preventing unplanned access to water.

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These practices support child safety, wellbeing, supervision, and compliance, and guide consistent decision-making, as set out in the relevant ProMapp processes for risk assessment, supervision, and environmental safety.

Key expectations include:

- environmental water hazards are identified during daily environment checks;
- containers and equipment that may collect water are emptied and stored safely;
- drains and fixed water hazards are secured and inaccessible to children; and
- environments are reassessed after rain, storms, or flooding.

Measure	Responsible	Minimum expectation	Policy/Procedure Reference
Daily monitoring of outdoor environments	All staff / Educators	• Empty any containers holding water straight away. • Store containers securely—if outside, keep them upside down with any plugs removed to prevent water collecting. • Regularly check resources for any wear and tear/no longer fit for purpose and discard/replace as appropriate.	3.4.07 Manage Outdoor Environments
Risk Assessment on environment	Centre Manager / Nominated Supervisor	Where centres have drains in or near the outdoor environment or potential for flooding, a risk assessment and management plan must be completed.	POL3-P4 Risk Assessment Procedure
Emergency procedures	All staff / Educators	Contact the local council for advice regarding potential flood waters rising during rain, storms, cyclone or other weather event. Follow emergency service advice in a flood emergency	POL2-P27 Emergency Response and Evacuation Procedure
Hazards	All staff / Educators	• After weather events conduct check of environments and raise any hazards appropriately • Outdoor checks of environment for any accumulation of water, check on outdoor resources things such as mould etc. and report/manage accordingly	3.3.16 Manage Hazards and escalated maintenance requests 3.4.07 Manage Outdoor Environments

Exceptions

When environmental water hazards cannot be adequately controlled, access to the affected area must be restricted until risks are reduced.

5.4. Manage hot water and drinking water safely

Ensure children are protected from risks associated with hot water and drinking water, legal requirements are met, and responsibilities for maintaining safe access are clear.

These practices support child safety, wellbeing, supervision, and compliance, and guide consistent decision-making, as set out in the relevant ProMapp processes for [3.4.08 Manage Water Safety](#) and [3.2 Manage Food and Hygiene](#).

Key expectations:

- children do not have access to hot water at any time;
- hot water temperature controls are in place and maintained to prevent scalding;
- hot drinks are not consumed near children or carried through children's spaces; and
- safe and appropriate drinking water is available to children throughout the day.

Key actions

The key actions below outline the practical steps that must be followed:

- ensure hot water outlets are controlled so water temperatures do not exceed approved limits of 45°C or temperature detailed in each state/territory;
- maintain practices that prevent children's exposure to hot liquids; and
- provide children with access to safe drinking water in line with hygiene requirements.

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5.5. Respond to water-related incidents and safety concerns

Ensure water-related incidents and safety concerns are responded to promptly and appropriately, risks to children are controlled, and reporting and accountability requirements are met.

These practices support child safety, wellbeing, supervision, and compliance, and guide consistent decision-making, as set out in the relevant ProMapp processes [3.3.12 Report Incidents and Complaints by Centres](#).

Key expectations:

- immediate action is taken to remove children from water-related danger;
- water-related incidents, hazards, and near misses are reported in line with service requirements [POL2-P24 Incident, Injury, Trauma and Illness Procedure](#)
- Educators follow established escalation to Centre Manager and seek guidance when additional support or decision-making is required.
- environments or activities involved in an incident are reviewed and controlled before being reused; and
- learnings from incidents inform changes to practice, planning, or risk management.

5.6. Support compliance through training, communication, and review

Ensure educators and others involved in the service understand and apply water safety requirements, legal obligations are met, and accountability is maintained through regular communication and review.

Key expectations include:

- educators are made aware of water safety requirements through induction and ongoing communication;
- water safety practices and expectations are reinforced through training, meetings, or supervision;
- the policy and procedure are accessible to educators and others at all times; and
- water safety practices are reviewed to identify opportunities for improvement.

5.7 Escalation and support

When gaps in understanding, practice, or compliance with water safety requirements are identified, the matter must be escalated to the Nominated Supervisor and the following actions must be taken:

- identify the area of concern or non-compliance;
- provide guidance, clarification, or additional training as required; and
- monitor practice to ensure requirements are understood and applied.

6. Roles and responsibilities summary

The following table provides a summary of role responsibilities that align with the procedures and ProMapp processes referenced.

Role	Responsibilities
Nominated Supervisor/Centre Manager	• ensure that 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 and for water-based activities • 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 of 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.
Educators	• reinforce water safety messages within the children's education program • make sure water hazards are managed as outlined in your procedure, e.g., water trough is emptied and packed away as soon as play has ended • 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, pet 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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	inspecting indoor and outdoor environments for potential water hazards, particularly during and after wet weather.
Families	to supply sun safe clothing to be worn. Sun protection measures as outlined in the Sun Protection and Extreme Heat procedure will be implemented.

7. Related legislation and internal documents

The following legislation, regulations and internal documents inform and support this policy/procedure, ensuring compliance with legal requirements and consistent implementation.

Legislation	Section 2A Section 165 Section 167 Regulation 25(1)(c)(l) Regulation 101 Regulation 115 Regulation 116 (A)(AA)(B)(C)	Regulation 168(2) (a)(iii) Regulation 169 Regulation 170 Regulation 171 Regulation 172 Regulation 274 Regulation 345
Policy/Procedure, Process	POL2-P6 Excursions Procedure POL3-P1 Providing a Child Safe Environment Procedure POL2-P26 First Aid Procedure POL2-P24 Incident, Injury, Trauma and Illness Procedure POL2-P25 Supervision Procedure POL3-P4 Risk Assessment Procedure POL4-P5 Grouping of Children Procedure POL2-P14 Sun Protection and Extreme Heat Procedure POL2-P27 Emergency Response and Evacuation Procedure	3.4.08 Manage Water Safety 3.4.03 Assess and Manage Risk 3.6.24 Plan and Conduct Excursions 3.6.26 Plan and Conduct Incursions 3.4.07 Manage Outdoor Environments 3.3.16 Manage Hazards and escalated maintenance requests 3.2 Manage Food and Hygiene. 3.3.12 Report Incidents and Complaints by Centres
Supporting Documents	FRM 3-F1 Risk Assessment Precedent Library L-Z.zip FRM 3-F1 Risk Assessment Precedent Library A-K.zip	Staying Healthy: 6th Edition
Learning Resources		

8. Version history

The version history table below records updates to this document, including approval dates and a summary of changes made.

Version Control	Date	Author	Description of Change
1	Oct 2013	AEG	Update ECSNR
1.2	Feb 2015	AEG	Update ECSNR
4.16	April 2016	AEG	Revision
7.17	July 2017	AEG	Revision
9.17	Sept 2017	AEG	Added drains
2.18	Feb 2018	AEG	NQS update
2.19	Feb 2019	AEG	Scheduled review
2.20	Feb 2020	AEG	Scheduled review
3.21	Mar 2021	AEG	Added flood water
3.22	Mar 2022	AEG	Scheduled review
3.23	Mar 2023	AEG	Scheduled review
12.23	Dec 2023	AEG	Added RACI table and reference
4.24	Apr 2024	AEG	Scheduled review. Removed double-up of information from other procedures
5.25	May 2025	AEG	Scheduled review
13	May 2026	AEG	Significant amendment - Update existing procedures to the restructured policy/procedure template. Check completed against the ACECQA – Water safety: policy and procedure guidelines and added more clarity on expectations

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