

Summary

This Water Safety Procedure is developed to provide practice guidance to Life Without Barriers staff, contractors, carers and other volunteers in supporting clients to engage safely in water activities.

1 Who should read this document?

This Procedure applies to all staff, contractors, carers and other volunteers providing direct or indirect support to Life Without Barriers clients to engage in water activities.

2 The meaning of terms and words used in this document

In the context of this Procedure, the following definitions apply:

Client is any child, young person or adult being supported directly or indirectly by Life Without Barriers under any program.

Dignity of Risk is the belief that each person with a disability is entitled to experience and learn from life situations even if these, on occasion, pose a risk to the person's wellbeing.

Direct Support is provided when staff, contractor, carer or other volunteer are engaged directly with a client to plan a water activity, including the completion of a risk assessment, and provide support/supervision during the activity.

Duty of Care (Disability Services) is the obligation to take reasonable care to avoid injury to a person whom it can reasonably be foreseen might be injured by an action or no action.

Duty of Care (OOHC) is the duty of a foster or kinship carer to provide quality care in accordance with the practice standards and/or legislation of the relevant state or territory.

Indirect Support is provided when a client is either self-selecting to engage in a water activity or being supported/supervised by others independent of LWB. Where indirect support is provided staff, contractors, carers or other volunteers could be involved in the planning and risk assessment for an activity.

Spotter is a person present at a water activity (not in the water) who has a role to observe and monitor risk management and/or identify any hazards during the activity.

Swimming Companion a person participating in the water activity or swimming with the client who is in the water at all times during the activity.

Water Activities are defined to include an activity in any body of water where drowning is a potential risk such as household bodies of water (baths, troughs etc.), swimming pools and spas (public or home), rivers, dams, lakes, creeks, and at the beach. It is also to include fishing and any type of boating activities that involves the water, water parks, spas, snorkelling, scuba diving, canoeing/kayaking and jet/water skiing.

Water Competency is the assessed level of skill and ability of an individual to swim and/or engage in water activities.

Water Safety Qualification means AustSwim or Royal Life Saving Society Bronze Medallion or Cross.

3 Sun Smart

All staff, contractors, carers or volunteers must be adhere to the Sun Smart strategies for themselves and any clients engaging in water activities.

- Slip on sun protective clothing that covers as much of your body as possible
- Slop on SPF 30 or higher broad-spectrum, water-resistant sunscreen, at least 20 minutes before sun exposure. Reapply every two hours when outdoors or more often if perspiring or swimming
- Slap on a broad-brimmed hat that shades your face, neck and ears
- Seek shade
- Slide on sunglasses.

4 First Aid

When staff or contractors are directly supporting water activities, as least one staff member must hold a current Senior First Aid Certificate.

5 Consent

The need and process for seeking consent for a client to engage in water activities will vary dependent on age, decision-making capacity or if an adult guardian is appointed.

5.1 For Children and Young People in Foster Care

- Foster Carers will be able to provide consent for children and young people to participate in water activities based on the authority given to them to provide day-to-day care.
- In some states/territories, requirements for participating in high risk activities may include water activities and the required approval must be sought before a child or young person engages in these activities.

5.2 For Children and Young People in Residential Care

- If it is a requirement for some water activities, seek approval/consent from any state/territory based authority for a child or young person in a residential e.g. high risk activities.
- Separate to those water activities that may require other consent, staff and contractors providing care to children or young people in a residential arrangement will be able to provide consent for participation in water activities in accordance with the approved program of activities for the residence, Care/Case Plan and the National Water Safety Policy Guideline and Procedure.

5.3 For Adult Clients

- Staff and contractors may be required to seek consent from a parent and/or adult guardian for an adult client being supported directly or indirectly to engage in water activities.
- If the adult is their own decision maker, consent is not required.
- Where an adult client does not have the capacity to given informed consent, a signed consent to engage in water activities must be sought from the parent and/or adult guardian. The consent should specify the type of water activities and specific sites consent is being provided for.

6 Planning and Risk Assessment

A pre-activity risk assessment must be undertaken before a client engages in any water activity, whether this be under the direct or indirect support of our staff, contractors, carers or volunteers.

The **SAFE pre-activity risk management process** needs to be applied to identify any risk and strategies to eliminate or manage the risks before a client commences a water activity. This includes when a client is indirectly supported to engage in a water activity. Refer to *Appendix A – SAFE Client Pre-Activity SAFE Assessment* for a checklist of steps in completing your risk assessment.



If a water activity is routine and at a consistent site/location, the pre-activity risk assessment needs to be reviewed on each visit to the location in case the conditions, environment and risk has changed. If the activity is being undertaken in a different location, a new risk assessment must be completed.

The risk assessment will identify any reasonably foreseeable risks and allow for the implementation of reasonably practicable strategies to manage the identified risks that will support clients to safely engage in the water activity.

A water activity risk assessment needs to include advice from relevant medical practitioners for all clients who have:

- Epilepsy, Diabetes management plans or Polydipsia
- A medical condition or impairment that could impact on their capability e.g. intellectual, physical, respiratory, cardiovascular, autonomic nervous system etc.

Advice from a medical practitioner should be sought for any client with poorly controlled epilepsy before they are supported to engage in water activities.

All staff, contractors, carers or volunteers must be familiar with the needs of all clients including any level of water competency, current alerts, medical issues (including seizure activity responses), manual handling plans and personal care requirements.

Completion of risk assessments of site/locations/venues should be completed prior to usage and that all equipment used for these activities are regulated and comply with current safety standards.

All staff, contractors, carers or volunteers must be aware of potential risks from crocodiles in relevant locations and Croc-Wise precautions must be adhered to.

WATER SAFETY PROCEDURE

6.1 For Children and Young People in Foster Care

- Planning and risk assessment is part of the duty of care (OOHC) responsibilities for carers in conjunction with the National Water Safety Policy Guideline and Procedure.
- Planning and risk assessment completed by a carer does not need to be documented.
- Carers must ensure children and young people are aware of the risks associated with any water activity and any controls in place to manage the risk.

6.2 For Children and Young People in Residential Care Arrangements

- Planning and risk assessment is part of the routine care responsibilities undertaken by support workers in accordance with the agreed program of activities for the residence, approved Case/Care Plan in conjunction with the National Water Safety Policy Guideline and Procedure.
- A documented risk assessment needs to be completed by support workers for each water activity/location.
- Support Workers must ensure children and young people are aware of the risks associated with any water activity and any controls in place to manage the risk.

6.3 For Adult Clients

- The support planning for each client to engage in water activities must include the seeking of consent if required, and the completion of a pre-activity risk assessment.
- The pre-activity risk assessment needs to be documented for each water activity/location.
- Ensure the adult clients, their parents and/or adult guardians are informed on the risks identified with any water activity and consent is obtained and recorded on the client's file and on CIRTS.

Staff are able to document their pre-activity risk assessment on the *HSE Client Activities Risk Assessment Template* (HSE-07-03-003).

7 Responsibilities

Executive Directors and Directors:

- Ensure all direct reports comply with this procedure.
- Ensure water-based activities comply with policy guidelines and procedures, including implementation and monitoring to ensure compliance with practice standards and statutory and legal obligations.
- Monitor procedural compliance.

Managers, Co-ordinators, Early Childhood Educators will:

- Ensure all staff, contractors, carers and volunteers directly or indirectly supporting client involvement in water activities are aware of the National Water Safety Policy Guideline and Procedure.
- Monitor procedural compliance including:
 - Seeking consent
 - Pre-activity risk assessment completion.
- Ensure staff and contractors directly supporting water activities have the required level of water competency to safely support a client(s).

WATER SAFETY PROCEDURE

Staff, Contractors, Carers and Volunteers

- Ensure they are aware of and complying with the National Water Safety Policy Guideline and Procedure.
- Ensure they are aware and understand any medical conditions, medications and/or capacity issue that could impact during water activities.
- Ensure there is a current compliance checklist for any backyard pools in carer residences or properties leased or owned by Life Without Barriers.
- Clients who have epilepsy management plans or any other medical condition or impairment resulting in significant support needs in a water environment, must be supported at least 2:1 in any water environment. To reduce this support arrangement to 1:1 approval from a Regional Manager is required.
- Engage with the client to ensure their understanding and awareness of:
 - The type of water activity being undertaken
 - Their role and responsibilities during the activity
 - The expectations/rules for the duration of the activity
 - Any risks/hazards that need to be managed.
- Ensure a charged mobile phone is available and within mobile range for the duration of the water activity.
- Be wary of slippery surfaces due to excess water.
- Ensure that everyone is aware of any rules/expectations that may apply to the particular activity which may include:
 - Staff member in the water with the client
 - Swimming between the flags at a surf beach
 - No running or diving at a pool
 - Application of Sun Smart – slip, slop, slap, seek, slide
 - Wearing a Personal Flotation Device (PFD) if required
 - Be wary of slippery surfaces.
- Provide a briefing to any clients prior to engaging in the activity including how to use any equipment.
- Keep the first aid kit/bag within easy access and appropriately stocked (including sunscreen and hats).
- Meet and greet the lifeguard on duty prior to engaging in the activity and discuss any support needs if appropriate.
- Where required, ensure safe lifts and transfers occur.
- Brief everyone on emergency procedures as appropriate.
- Staff/carers should have ready access to equipment that can be used in rescue situations e.g. floating objects, throw ropes, and life jackets (complying to current Australian Safety Standards).

8 Essential for all Water-Based Activities

8.1 Swimming/water activity in sheltered waters – such as household bodies of water, creeks, dams, lakes and swimming pools

All staff and carers must ensure that:

- They observe all signage and comply with rules for the specific environment (e.g. pool safety, signs, flags, observe warnings).
- There is adequate staffing or carer/adult levels to reduce any identified risk.
- The water competency of the client has been assessed to allow for engagement in varying water activities e.g. swimming laps – endurance, able to swim independently.

WATER SAFETY PROCEDURE

- All clients with an epilepsy management plan or medical condition/impairment resulting in high support needs require:
 - a swimming companion in the water and close by at all times
 - staff/carer who is a strong swimmer and can stand on the bottom of the pool/creek at all times
 - to not go into the water at a depth over their chest (unless completing laps)
 - a spotter outside the water observing the activity
 - provide advice to the on duty lifeguard of the support needs of the client
 - do not enter the water where no lifeguard is present.

8.2 Swimming/water activity in Open Waters – such as Surf Beaches

All staff and carers must ensure that:

Activities in the surf are conducted at a controlled beach where the beach is patrolled by life guards.

That clients do not enter the water where no lifeguard is present

All rules for the activity environment are strictly followed (e.g. swimming between the flags, observing warnings for rips) unless a client is engaging in an activity that is prohibited between the flags e.g. surfing.

There is adequate staffing or carer/adult levels to reduce any identified risk.

The water competency of the client has been demonstrated to allow for engagement in varying water activities e.g. boogie boarding, body surfing – endurance, able to swim independently, capacity to manage the waves.

Clients do not go into the water at a depth above their chest unless assessed a competent to engage in an activity in deeper water e.g. boogie boarding, surfing.

All clients with an epilepsy management plan or medical condition/impairment resulting in high support needs require:

- a swimming companion in the water and close by at all times
- staff/carer who is a strong swimmer and can stand at all times
- to not go into the water at a depth over their chest
- a spotter outside the water observing the activity
- provide advice to the on duty lifeguard of the support needs of the client
- do not enter the water where no lifeguard is present.

8.3 Epilepsy or Seizures

If working in a group situation and one or more clients are prone to seizures, there must be a staff/carer positioned as a spotter out of the water as an observer in addition to adequate staff/carer levels in the water. Inform the lifeguard on duty that the client/s has seizures.

A safety vest or buoyancy vest may be necessary for some clients with seizures and wearing tinted goggles or sunglasses may reduce seizures if flickering or reflective light is a seizure trigger.

If a client has a seizure whilst in the water the following must occur:

- Ensure the head is kept above the water. Support the head by placing your arms under the swimmer's arms (underarm) and up to hold the head in place (placing one hand either side of the head, so that their face is out of the water.
- Tilt their head back to ensure a clear airway.

WATER SAFETY PROCEDURE

- Once the convulsion has stopped, the client should be removed from the water, ensuring that a staff member/carer has secured the client safely in case of a further seizure.
- Other staff/carers observing must be actively observing any remaining clients not involved.
- Once out of the water, place the client on their side, check to see if they are breathing and begin resuscitation if necessary (and only after convulsion stops).
- Follow an individualised seizure management plan (do you need to call an ambulance urgently?).

Where clients with epilepsy are engaged in water activities, directly supervise and monitor the activity to ensure that the location, timing and nature of the activity do not:

- Increase the likelihood of seizure (by high level noise);
- Cause undue risk of harm or injury to the client or yourself in the event of a seizure; or
- Compromise the privacy and rights of the client.

8.4 Transfers/Manual Handling

All staff must follow manual handling transfer practices and individual manual handling/mobility plans.

Ensure that there are adequate staff/carers to assist with transfers.

Ensure no lifting occurs for adults or adult sized clients. Hoists must be used for all lifts if a person is unable to manage their transfer needs.

Allow clients to be as independent as possible whilst allowing for safe transfers into and out of the water.

9 In Case of an Emergency Situation

- Self-preservation must be a priority and then ensure the safety of other clients and exit the group from the water.
- Have someone call for an ambulance (especially if the client/s head was under the water when a seizure began; or if the convulsion is longer than five minutes; or if the client has difficulty breathing or fails to recover to normal function in the expected time.
- Follow DRSABCD procedures as set out by St Johns Ambulance. Check for:
 - Danger (to yourselves, others and the patient)
 - Response (of the victim)
 - Send for help (call 000 for an ambulance or ask another person to make the call)
 - Airway (open mouth, open airway)
 - Breathing (check for breathing)
 - CPR (Start CPR – 30 chest compressions).
 - Defibrillation (apply defibrillation).
- Contact the Operations Manager or Program Coordinator (for staff) or Case Manager/Support of Carer (for carers).
- Follow up with mandatory medical check.

WATER SAFETY PROCEDURE

- Have Program Coordinator/Operations Manager contact all relevant stakeholders including Guardian if relevant.
- Complete incident form (staff only).
- Debrief the incident with the Program Coordinator/Operations Manager and other staff involved or Case Manager/Support of Carer (for carers).

10 Review of this Policy Guideline

This procedure will be subject to review after 2 years or as required and in accordance with legislative and regulatory requirements.

11 Related Policy Guideline or Documents

- Risk Assessment and Planning Policy Statement
- National Water Safety Policy Guideline
- HSE-07-03-003 Client Activities Risk Assessment – Water Safety
- Water Safety Activity Guide for Disability Carers
- Water Safety Activity Guide for OOHC Carers
- Water Safety Activity Guide for Staff and Contractors

DOCUMENT NAME	Water Activity Safety Procedure		
DOCUMENT TYPE	Procedure		
SERVICE SECTOR/S	All Service Sectors		
VERSION	1		
APPROVAL DATE	[Approval Date]	REVIEW FREQUENCY	2
APPROVED BY	Mary McKinnon		
	The signatory (lead Executive) is accountable to implement, maintain and monitor appropriate systems to achieve the objectives of this document.		
BUSINESS PORTFOLIO	Client Services (Operations)		
CONTACT FOR QUERIES	Rachael Anderson		
RELATED TOPIC/S	Planning for Safety; Hazard Awareness and Management		

APPENDIX A – SAFE Client Pre-Activity Risk Assessment

CONDUCT YOUR PRE-Activity **SAFE** ASSESSMENT

For staff, contractors, carers and other volunteers

1. **Be familiar** with the needs of all clients
2. **Assess** each water activity/location and the capability of each client before they commence a water activity (review previous assessment if location remains the same)
3. **Seek advice** from a medical practitioner for clients with Epilepsy and Diabetes management plans or Polydipsia, Medical Conditions or Impairment that could impact on their ability e.g. intellectual, physical, respiratory and cardiovascular and autonomic nervous system etc.
4. If there are **foreseeable risks**, put strategies in place to manage these risks
5. **Ensure** there is mobile phone or other telephone reception at the location of a water activity
6. Staff must **document** the pre-activity SAFE Assessment

S	<p>STOP and think</p> <ul style="list-style-type: none"> ▶ Engage your mind before your hands ▶ Don't rush in and get carried away! ▶ Ask: <ul style="list-style-type: none"> • Do I have all of the information to do the task safely • Is the Water Activity able to be completed safely for the client and staff member/carer? • Do I have the resources for the activity to be completed safely? 	<p>Are you familiar with the needs of the client including the level of water competency, current alerts, medical issues or impairments, manual handling plans and any personal care requirements?</p> <p>Are you familiar with the location and environment where the water activity will be undertaken?</p>
A	<p>ASSESS and identify hazards</p> <ul style="list-style-type: none"> ▶ Assess the activity location/environment and find any risks ▶ Check to see what else is happening in the area and surroundings ▶ Understand the limits and skills of clients and yourself if you are directly supporting a water activity ▶ Identify what is the chance the risks could affect you, the client or others ▶ Identify what would be the consequences if the risk isn't eliminated or managed 	<p>What are the potential risk? E.g.</p> <ul style="list-style-type: none"> ▶ Crocodiles ▶ Rips ▶ Staff, contractor or carer has no confidence in the water ▶ Client has inflated view of their water competency ▶ Seizure or other consequences related to a medical condition ▶ No lifeguard on duty ▶ Client is engaging in water activity with friends without direct support ▶ Backyard pool has no compliance certificate
F	<p>FIX the hazards with effective controls and advise others</p> <ul style="list-style-type: none"> ▶ Eliminate the risks/hazards ▶ Control the risks/hazards ▶ Minimise the consequences 	<p>How could you eliminate the risk? E.g.</p> <ul style="list-style-type: none"> ▶ Not proceed with the water activity ▶ Go to a location where a lifeguard is on duty ▶ Increase water competency before commencing activity ▶ Have a swimming companion/spotter ▶ Procure a qualified instructor to participate in the activity with the client <p>How could you control the risk?</p> <ul style="list-style-type: none"> ▶ Use of safety equipment e.g. life jacket ▶ Only enter water to waist height ▶ Staff/carers develop their level of water competency e.g. water safety qualification ▶ Clients develop their level of water competency e.g. water safety qualification, swimming lessons
E	<p>ENGAGE your co-workers, clients and other stakeholders</p> <p><i>Explain the new rules/expectations and advise why the changes are important to the health, safety and wellbeing of the clients, those supporting them and others</i></p>	<p>Ensure there is understanding and awareness of:</p> <ul style="list-style-type: none"> ▶ The type of water activity being undertaken ▶ Roles and responsibilities during the activity ▶ Expectations/rules and any risk/hazards to be managed

WATER SAFETY PROCEDURE

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SAFE IN PRACTICE FOR CLIENT ACTIVITIES

STOP ASSESS FIX ENGAGE		Yes	No
STOP	Have I read and signed that I understand the Client Activities Risk Assessment for this activity? (If you did not complete the assessment)	✓	✗
	Am I familiar with the needs of all clients including any level of water competency, current alerts, medical issues (including seizure activity responses), manual handling plans and personal care requirements?	✓	✗
	Have I inspected the activity location?	✓	✗
ASSESS	Are the controls established in the Client Activities Risk Assessment still relevant and in place?	✓	✗
	Is the environment safe for clients? E.g. adequate path of travel to the activity location, Life guard on duty, mobile reception	✓	✗
	Is the environment safe for clients? e.g. ground conditions, busy road/carpark, contact with water	✓	✗
	Is their adequate access to the toilets, are they safe for use?	✓	✗
	Does the public venue expose clients to large numbers of people, noisy locations and contact with public that would create potential escalations or extra hazards?	✓	✗
	There are no other hazards that I can identify in the area?	✓	✗
FIX	<i>If you answer No to any question STOP and review the Risk Assessment, discuss with your supervisor or the HSE team and document any changes.</i>		
ENGAGE	<ul style="list-style-type: none"> ▪ Discuss the identified hazards with client(s) & workers in the activity area ▪ Explain the safety controls that have been implemented ▪ If required discuss the identified risk(s) with other stakeholders in the activity location e.g. Life guard ▪ Discuss any identified risk(s) and controls post activity with your supervisor and any team of support workers supporting the client e.g. shift report 		