## FAQ – Safety requirements for conducting activities in pools

This information is provided to Queensland state schools to answer commonly asked questions and clarify safety requirements when planning to conduct activities in swimming pools.

An extract of Royal Life Saving Queensland’s [Guidelines for Safe Pool Operations](https://rlssq.com.au/department-of-education-queensland) (RLSSQ-GSPO) is available to support school decision-making.

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While this information is specific to swimming in pools, many of the questions and responses also apply to other aquatic activities conducted in other water locations.

## ***What supervision ratio is required?***

There is no one-size-fits-all model for supervision ratios because all learning contexts are different. For example, there are:

* Supervisor factors – capability (skills, qualifications) and capacity (performance, ability)
* Environmental factors – weather
* Facility factors - depth indicators, depth changes, drain outlets, covers and grilles, suction levels, visibility from the pool deck
* Equipment factors - in-water equipment such as ladders, sharp edges or projections
* Student factors - age, current swimming competency, medical conditions/disabilities/behaviours that impact on safety in the water, participation numbers in the water
* Activity factors – complexity of skill required, wearing additional clothing in survival activities.

The CARA guideline states: *Principals make final supervision decisions for the activity. Sufficient adult supervision must be provided to manage the activity safely (including emergency situations).*

The risk to students may be elevated if hard-and-fast ratios are applied without first considering the local context of the activity (environment, facility and equipment, supervisor capability, students). Schools know their context best, so **principals collaborate with the adult supervisors of the activity** to determine a supervision ratio that best fits their local activity context.

Here are some example decisions a school made for two different Year 6 classes:

* **6A is undertaking water safety activities at the beginning of the year:**
  + three students have an individual behaviour support plan that indicates “risk to safety of others”
  + two other students have medical conditions (seizures, low muscle tone in the limbs) that impact their safety in the water.

The school collaboratively decided that THREE supervisors were needed to prevent and manage incidents. One supervisor will actively supervise from the pool deck and two other supervisors will conduct the planned activity in the water.

* **6B is undertaking swimming for survival activities (lap swimming and stroke correction) at the end of the year:**
  + all students are competent across the spectrum of competencies in the *Water safety and swimming education program* for the Year 5 and 6 band.

The school collaboratively decided that TWO adult supervisors were needed to prevent and manage incidents. All supervisors are allocated to actively supervise from the pool deck.

For further information, consult [RLSSQ-GSPO](https://rlssq.com.au/department-of-education-queensland/).

## ***What if the external provider insists on using their program and supervision ratios?***

Principals make the final decisions in approving curriculum activities. These decisions must ensure all curriculum activities are justified by the expected educational outcomes, given the level of residual risk.

As part of the school-wide CARA process, the school (i.e. the principal or the teacher with overall responsibility for the activity) should involve the external provider in collaboratively planning the activity to ensure all foreseeable hazards, risks, and control measures relevant to the activity and the specific school/group circumstances have been identified and managed. This collaboration provides an opportunity for the school to raise any concerns with the activity provider prior to the activity.

Principals are to ensure a registered teacher maintains overall responsibility for swimming activities, even when other adult supervisors are engaged to instruct or support activities.

## ***What supervisor qualifications are needed?***

A qualification is evidence that a person has reached a level of competence in a particular set of skills and provides a level of assurance for the principal to support their decision making.

But there is a distinction between being qualified to a safety standard (knowledge and skills to prevent and manage incidents) and being qualified to a teaching standard (knowledge and skills to teach students how to be water safe).

Safety standard

The CARA guideline demonstrates the minimum *safety standard.* Most importantly, **an activity must not go ahead if the risks and hazards cannot be effectively controlled to keep everyone safe.**

* Supervisors in recovery/emergency roles must have demonstrated ability to manage incidents e.g. current rescue, CPR and first-aid qualifications
* Supervisors in general supervision roles must have capacity to:
* prevent an incident from occurring;
* follow an established emergency plan for the activity.

Teaching standard

To safely and effectively teach water safety skills to students, the *WSSE: Delivering a water safety and swimming education program in Queensland state schools* requires at least one adult supervisor to have a current water safety and swimming teacher qualification from a registered training organisation (RTO) or governing sporting body e.g. AUSTSWIM, Royal Life Saving. Such courses invariably include the *safety standard* as part of the qualification.

If someone other than a registered teacher is leading the activity, the expectation is that they will meet both the safety standard and the teaching standard through a suitable qualification such as a Swimming and Water Safety Teacher skill set.

If qualifications are not available, or cannot be obtained, the principal is able to determine an alternative method of assurance.

NOTE:

**ALL activities in water must meet the safety standard, however WSSE activities additionally require the person leading the activity to meet the teaching standard.** Schools may wish to invest in a water safety and swimming teacher qualification that includes both the teaching standard and the safety standard.

For further information, consult [RLSSQ-GSPO](https://rlssq.com.au/department-of-education-queensland/).

## ***What are the requirements if my school owns the pool?***

The department’s [*Asset maintenance and school swimming pool operation procedure*](https://ppr.qed.qld.gov.au/pp/asset-maintenance-and-school-swimming-pool-operation-procedure)provides clear guidelines and responsibilities for state schools with swimming or hydrotherapy pools, including the[*School Swimming Pool Operation and Management Guidelines.*](https://ppr.qed.qld.gov.au/attachment/swimming-pool-operation-and-management.docx)

For further information about specific risks for your pool, please contact your local [regional office](https://education.qld.gov.au/contact-us/state-schools-regional-contacts).

## ***What facility hazards should be considered?***

Some facility hazards for consideration may include, but not limited to:

* **Pool design** – pool size and water depth changes; drain outlets, covers and grills to prevent entrapment, emergency pump shut-off; in-water features (ladders); sharp edges or projections; signage
* **The environment** – pool surroundings, water hygiene/temperature/clarity; in-water litter; glare impeding supervisor visibility;
* **Resources** –rescue and resuscitation equipment; first aid resources; lifeguard presence; communication to local emergency services.

For further information about specific risks for your local context, please contact your local [regional office](https://education.qld.gov.au/contact-us/state-schools-regional-contacts).

## ***What should be in a supervision/emergency plan?***

These plans outline the roles and responsibilities of each supervisor and the actions to be taken to prevent an incident and to manage an incident if one were to occur.   
These plans are to be specific to the activity context and consider the local environment, the facility and equipment being used in the activity and the participants needs.

Note: Supervisors may be allocated more than one role or responsibility or action.

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| --- | --- |
| **To prevent an incident** | **To manage an incident** |
| **Supervision role** | **Recovery/Emergency role** |
| Identifying emerging hazards and manage the risks to prevent an incident. | Managing an incident to limit the severity of the consequences. |
| **Specific actions allocated to supervisors include:** | |
| * Provide instruction to students on safety protocols (e.g. whistle signals, change rooms) prior to the activity * Provide instruction to students on correct techniques (e.g. water entry/exit) prior to the activity * Provide instruction in or out of the water, as appropriate * Support the lead instructor in or out of the water, as appropriate * Water-watch from the pool-deck * Supervise non-swimmers   etc | * Perform a rescue procedure * Conduct CPR and/or first-aid * Conduct communication protocols * Crowd control * Lead an evacuation of the pool or venue.   etc |

For further information, consult [RLSSQ-GSPO](https://rlssq.com.au/department-of-education-queensland/).

## ***What is ‘active supervision’?***

At all times, safe participation in any activity begins with a commitment to health and safety from all adult supervisors.

*Active supervision* requires focusing attention on students when they are in, on or around a water location. These four steps are adapted from [Royal Life Saving Australia’s Keep Watch at Public Pools](https://www.royallifesaving.com.au/Aquatic-Risk-and-Guidelines/safety-programs/child-supervision/keep-watch-at-public-pools) webpage.

1. **Be Prepared:**
   * Know your students’ needs
   * Know the safety and emergency protocols, including location of key staff and rescue equipment.
   * Know the transport and change room protocols
   * Have everything you need before getting into the water, such as teaching materials
   * Know your student numbers
2. **Be Close:**
   * Always be within arms’ reach of students 5 years and under.
   * Always be close enough to students over 5 years to determine if they’re in difficulty.
   * Always be within arms’ reach of students with any known condition (e.g. physical or medical) that may inhibit their safe participation.
3. **Give All Your Attention:** 
   * Focus all your attention on the students and maintain visual contact.
   * Scan the water from a strategic position to ensure maximum vision. Reposition as necessary
4. **Supervise All the Time:**
   * Never leave students unsupervised, nor in the care of other students. Lifeguards should not be relied upon for supervision, unless directly engaged as a supervisor of the activity (with clear roles and responsibilities identified on the supervision/emergency plans and injury management protocols).
   * Be alert to emerging hazards, anticipate situations to prevent incidents and be ready to intervene early to manage the risk.

For further information, consult [RLSSQ-GSPO](https://rlssq.com.au/department-of-education-queensland/).

## ***What sorts of things should be in the induction?***

The induction is conducted to prepare all supervisors for the activity to keep everyone safe. It ensures supervisors are fully informed about the activity context (environment, facility, equipment, students) and are aware of their roles and responsibilities, along with the risks and hazards that exist or may arise before/during/after the activity. As part of the induction process, it is recommended the registered teacher with overall responsibility for the activity:

* Develops understanding of ‘active supervision’ as a core responsibility for everyone and allocates a supervisor to each role/responsibility within the *Supervision plan.*
* Discusses safety protocols such as hand up for assistance and whistle signals.
* Discusses correct techniques such as appropriate water entries/exits and use of emergency equipment. Consider providing a map of the facility that shows pool entry/exit points, location of rescue and emergency equipment.
* Provide a flowchart (or similar) demonstrating the *Emergency plan, Injury management protocols* and *Communication protocols* for the activity at the facility.
* Run through scenarios to build supervisor capacity to respond appropriately to a recovery and/or emergency at the facility, including communication protocols (000, pool operator, principal, parents etc).
* Invite discussion on supervision challenges. Collaboratively identify situations in which supervisor behaviours may pose a hazard and the interventions that may be imposed to keep everyone safe e.g. raise their awareness of their behaviour, change the role of that supervisor, suspend or cancel the activity.

For further information, consult [RLSSQ-GSPO](https://rlssq.com.au/department-of-education-queensland/).

## ***Why is free swimming banned? Can students still have fun in the pool?***

After a [spate of incidents](https://www.worksafe.qld.gov.au/news-and-events/alerts/incident-alerts/2023/one-swimming-pool-drowning-and-one-near-drowning) in pools, including the [tragic drowning of a student in Victoria](https://www.worksafe.vic.gov.au/news/2024-05/180000-fines-after-student-drowns-school-camp), changes were made to the CARA guidelines to help prevent similar incidents occurring.

*Unstructured* activities, such as free swims, embolden students to act erratically or otherwise unintentionally engage in behaviours that endanger themselves or others, for example swimming out-of-depth, playing breath-holding games and actively seeking out ways to be out-of-sight of supervisors.

When using the [CARA risk matrix](https://education.qld.gov.au/curriculum/stages-of-schooling/CARA), it is foreseeable then that a *critical* incident is *likely* to occur during unstructured activities, and therefore unstructured activities inherently pose an *extreme* risk to students. When intending to undertake any extreme risk activity, teachers must consider planning an alternative activity or modifying the activity to reduce the risks.

So, by modifying activities to provide structure through effective pedagogical and organisational practices, students become purposefully engaged in learning, which supports risk mitigation. Some examples of structured activities might be novelty races using pool noodles/kick boards, strength/endurance activities such as water running in waist-deep water and modified ball games, such as volleyball.

At all times, safe participation in any activity begins with a commitment to health and safety from all adult supervisors.

## ***Why do the requirements keep changing? How are we notified?***

The CARA guidelines are updated regularly in consultation with schools, however there are times when changes are required that are not consulted on. For example, after a recent [spate of incidents](https://www.worksafe.qld.gov.au/news-and-events/alerts/incident-alerts/2023/one-swimming-pool-drowning-and-one-near-drowning) in pools that included the [tragic drowning of a student in Victoria](https://www.worksafe.vic.gov.au/news/2024-05/180000-fines-after-student-drowns-school-camp), changes were made to the CARA guidelines without consultation to help prevent similar incidents occurring in schools.

The department uses ConnectEd as the only must-read e-newsletter for all department staff, enabling it to become the single point-of-truth for department messaging. It flags new and changed information with advance warning of change, including changes to the CARA guidelines, and enables everyone across the department to select only the messages relevant to their role.

#### How do principals ensure enough has been done to ensure student safety?

The law only requires a reasonable standard of care i.e. what would a reasonable person have done in the circumstances?

It does not expect that school staff will be able to protect against all harm. Each matter will depend on its individual facts and circumstances.

You should ask:

* Have all *foreseeable* risks been identified?
* Have all *reasonable* steps been taken to reduce these risks?

To this end, principals are to develop and establish a school-wide CARA process to plan for the safety of all those involved in curriculum activities and provide a program of training to ensure all staff are aware of, and comply with, the established school-wide CARA process.

It is anticipated this process would include collaboration to ensure all foreseeable hazards, risks and control measures (relevant to the activity and the specific school/group circumstances) have been identified and managed.