



Multicultural Community Water Safety Program

Saving lives, removing barriers and building belonging.



ROYAL LIFE SAVING
AUSTRALIA



Australian Government



POLICY

WE SWIM Code of Conduct

Safety, Child Safeguarding and Cultural Safety

Document status	Policy
Date developed	17 August 2026
Developed by	RJ Houston, Chief Operating Officer
Authorised by	Dr Justin Scarr, Chief Executive Officer
Next review	1 July 2027

Royal Life Saving Society – Australia expects everyone delivering the WE SWIM Multicultural Community Water Safety Program to uphold this Code of Conduct.

This Code applies to everyone involved in delivering WE SWIM including but not limited to Royal Life Saving staff, delivery partners, grantees, volunteers, ambassadors and contractors. Everyone is expected to:

- Treat every participant, colleague and community member with respect, valuing their culture, identity and diversity.
- Ensure the safety and wellbeing of every participant is treated as an equal, non-negotiable priority, including the particular care owed to children and young people.
- Ensure all in-water delivery takes place at safe, supervised locations with appropriately qualified staff, meeting industry-standard aquatic safety guidelines and standards (see Aquatic safety below).
- Deliver programs that are culturally safe and welcoming.
- Act with integrity and transparency in program delivery, reporting and use of funding.
- Oppose harassment, discrimination and bullying in any form.
- Report concerns or incidents promptly, in line with the incident and complaints notification requirements below.

Breaches of this Code may affect a grantee's or delivery partner's ongoing eligibility for WE SWIM funding. Where programs are delivered in a consortium, arrangements should be understood and managed across the consortium.

Consortiums, grantees and delivery partners must operate consistently with the following eligibility requirements at every stage of design, application and delivery, and may be asked to provide evidence at any point in the grant lifecycle.



Multicultural Community Water Safety Program

Saving lives, removing barriers and building belonging.



ROYAL LIFE SAVING
AUSTRALIA



Australian Government



Ethics

- All grantees and third party delivery partners must treat all individuals with respect and value their diversity and identity, acting with integrity and transparency in all activities, and reporting concerns or incidents of misconduct in accordance with Royal Life Saving procedures.
- Conflicts of interest must be disclosed and appropriately managed.
- Report concerns or incidents of misconduct, or conduct likely to bring Royal Life Saving, WE SWIM or the Australian Government into disrepute, in line with the incident reporting requirements below.

Aquatic safety

All in-water delivery must occur in safe, risk-assessed and appropriately supervised environments, with staff holding qualifications appropriate to that environment and the activities involved. Applicants must detail the qualifications that delivery and supervisory staff will hold, and the environment in which the program will be delivered.

Aquatic facilities

Aquatic facilities used as venues for the delivery of WE SWIM funded programs must demonstrate sufficient levels of safety assurance and adherence to best practice.

They can do this by:

- Providing evidence of a current subscription to the [Guidelines for Safe Pool Operations \(GSPO\)](#).
- Providing evidence that they have recently undertaken a Royal Life Saving-approved [Aquatic Facility Safety Assessment \(AFSA\)](#). The preferred cadence is:
 - **Metropolitan facilities (including seasonal):** every 12 months.
 - **Year-round facilities in regional cities:** every 12 months.
 - **Regional seasonal pools:** every 3 years.
- Providing suitably qualified staff for program instruction and supervision, in line with the GSPO (refer to the [Training and Qualifications Guideline](#)).

Facilities that do not demonstrate sufficient adherence to the GSPO through an AFSA and suitably qualified staff are not eligible for WE SWIM delivery or funding.

Open water

- Delivery at Beach venues must engage a lifeguard or volunteer lifesaving service recognised by Surf Life Saving Australia or Council in risk management.
- Applications must demonstrate partnership with one or more of: a Surf Life Saving club, a state/territory Surf Life Saving Australia member organisation, or a council lifeguard service.



Multicultural Community Water Safety Program

Saving lives, removing barriers and building belonging.



ROYAL LIFE SAVING
AUSTRALIA



Australian Government



- Royal Life Saving discourages delivery at inland waterways given their higher, more variable risk profile. Where a case can be made, delivery must adhere to the [Guidelines for Inland Waterway Safety](#).

Child safeguarding

- All staff, volunteers and contractors engaging with children and young people must hold a current Working With Children Check (or equivalent state/territory clearance) before delivering WE SWIM.
- Program providers must have documented safe recruitment and screening practices for anyone working with children, and provide child safety training appropriate to their role before delivery.
- Program providers must maintain a child-safe policy or statement of commitment, covering codes of conduct for interacting with children, appropriate supervision, and safe practices for transport, change rooms and photography.
- Any concern, disclosure or complaint relating to a child's safety must be responded to immediately and reported to Royal Life Saving in line with the incident reporting requirements below.

Cultural safety and inclusion

- Culturally responsive delivery addresses language, gender, dress, trust-building and access.
- Every grantee delivering to multicultural communities has completed cultural safety training and holds a statement of commitment or policy on cultural safety and/or diversity and inclusion. Applicants may be required to provide evidence.
- Communications should be plain language, safety-first and strengths-based, and multilingual where appropriate.

Insurance, privacy and data governance

- Public liability insurance current for the lead organisation and/or the organisation providing the in-water services.
- Privacy and data handling arrangements ensure compliance with Commonwealth and state/territory privacy requirements, including the [Privacy Act 1988 \(Cth\)](#) and its Australian Privacy Principles, the Privacy and Personal Information Protection Act 1998 (NSW), the Privacy and Data Protection Act 2014 (Vic), the Information Privacy Act 2009 (Qld), and [equivalent state/territory privacy legislation](#).

Incident and complaints notification

- Royal Life Saving must be notified within 24 hours, and provided with an incident report, wherever any of the following occurs: an injury involving medical or emergency services attendance; a child safety complaint or issue; a complaint



Multicultural Community Water Safety Program

Saving lives, removing barriers and building belonging.



ROYAL LIFE SAVING
AUSTRALIA



Australian Government



relating to cultural safety; and/or any conduct likely to bring Royal Life Saving, WE SWIM or the Australian Government into disrepute.

- Where a child safety incident occurs, the relevant state/territory child protection or reporting authority must also be notified in accordance with mandatory reporting requirements.
- Where a participant is harmed, the relevant state/territory work health and safety regulator (e.g. WorkSafe) must also be notified in line with state/territory notifiable incident requirements.
- Royal Life Saving will assess reported concerns and breaches of this Code fairly and proportionately, and may take actions including corrective action or retraining, a formal warning, additional funding conditions, suspension of delivery or funding, or termination of a funding agreement.
- Serious breaches, including harm to a participant, or conduct that seriously damages the reputation of Royal Life Saving, WE SWIM or the Australian Government, may result in immediate suspension of funding.