



Health, Seniors and Active Living

Population and Public Health

4074 - 300 Carlton St.

Winnipeg, MB. R3B 3M9

www.manitoba.ca

June 11, 2019

Michelle Stephen-Wiens

Acting Director

Early Learning and Child Care Program

210-114 Garry Street

Winnipeg MB R3C 4V4

Re: Use of Recreational Water Facilities by Early Learning and Child Care Facilities

With the upcoming arrival of summer, many licensed early learning and child care (ELCC) facilities may be considering options for outdoor play spaces. Some ELCC facilities may be interested in using a residential swimming pool as one of these options.

The purpose of this letter is to notify you of consistent, province-wide requirements regarding the use of recreational water, including but not limited to residential in-ground and above-ground swimming pools, portable pools, “kiddie” or inflatable wading pools, hydro-massage pools, hot tubs, and spas in licensed ELCC facilities.

Please note that these types of unregulated recreational water facilities do not meet the minimum requirements of the Manitoba legislation for public use, and therefore shall not be used for water activities for children attending ELCC facilities.

All water activities conducted by licensed ELCC facilities should take place at recreational water facilities that are permitted under the *Swimming Pools and Other Water Recreational Facilities Regulation* MR 132/97. Should an ELCC facility choose to use a residential pool for child care water activities, it becomes a “semi-public pool” and must meet all requirements under the regulation, such as specific safety equipment, a qualified lifeguard on duty, an automatic chlorination system and required signage. To learn more about the regulatory requirements, visit web2.gov.mb.ca/laws/regs/current/_pdf-regs.php?reg=132/97.

All licensed ELCC facilities:

- While caring for children, ELCC staff and providers should prohibit the use of, and access to all recreational water facilities located on the premises of any single or multi-dwelling private residence, including houses, townhouse complexes, apartment buildings or the home of a licensed child care provider.

Licensed group and family child care homes:

- At all times, home-based providers should take all necessary steps to prevent access to recreational water facilities located on your property by ensuring that all means of entrance to the recreational water area are securely locked and surrounded by a fence or other physical barrier.

RATIONALE

The health, safety and well-being of children is of utmost priority.

In the Canadian Drowning Report 2017 Edition, the Lifesaving Society of Canada reported that between 2010-2014, private backyard pools continue to be the primary setting where children 1-4 years of age most often drown (39%).

The report also stated that between 2010-2014, the majority of pool drowning fatalities occurred in private pools (89%). Fewer drowning deaths occurred in lifeguard supervised settings such as public pools and waterfronts. In 2010-2014 approximately 1% of all water-related fatalities occurred in a setting supervised by lifeguards.

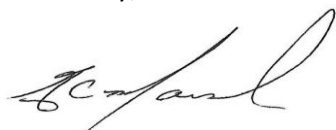
Temporary type of wading pools that are common in centres and homes pose potential risks, not only to bather safety, but also to health risks associated with untreated water. These “*blow-up wading pools*” typically do not contain filtration and disinfection systems to filter out physical contaminants, or disinfect the water, which will lead to increased risk of the spread of recreational water diseases. Public pool facilities are required by regulation to continuously recirculate, filter and disinfect the water, and test the water every 2-3 hours to ensure the water is bacteriologically safe. The blow up wading pools, over the span of a few hours have the potential to expose the children to such organisms as *E. coli*, *Pseudomonas aeruginosa*, *Cryptosporidium* and an assortment of other pathogenic organisms.

ALTERNATIVES TO THE USE OF RESIDENTIAL POOLS FOR WATER ACTIVITIES IN CHILD CARE SETTINGS:

- When incorporating water play, the use of splash pads, sprinklers, hoses or water tables at your own facility is encouraged with close adult supervision.
- ELCC staff and providers may decide to have children attend and use public pools (e.g. for swimming lessons). It is recommended that children attend regulated “public pools” where:
 - there is a qualified lifeguard(s) on duty at all times in accordance with *Swimming Pools and Other Water Recreational Facilities Regulation*;
 - the rules of the public pool are followed;
 - the children are accompanied and directly supervised by adults at all times and appropriate adult-to-child ratios are maintained at all times.

Should you require any further information about this issue, please contact me.

Yours truly,



Gregory Marsh, C.D. B.Sc., C.P.H.I. (C)
Recreational Water Specialist
Manitoba Health, Seniors and Active Living
Population and Public Health
Ph. 204-788-6795
FAX: 204-783-6399
Email: gregory.marsh@gov.mb.ca