



LIFESAVING SOCIETY

*The Lifeguarding Experts*

LS25.3.2

May 3, 2018

To Members of the Licensing and Standards Committee, City of Toronto

I am writing to support the recommendation of the Executive Director, Municipal Licensing and Standards for amendments with regards to fencing bylaws.

The Lifesaving Society works to prevent drowning and water-related injury through our training programs, Water Smart public education, aquatic safety management services and lifesaving sport. We have been teaching water safety and water rescue to Canadians for 100 years. We are a registered charity.

Our mission is to prevent drowning.

Much of the work that I do as the public education director is to identify strategies that will prevent these drownings from occurring.

One of the highest risk target groups are children under the age of 5 years of age. Drowning is the second leading cause of death for this age group – after automobile collisions.

Children under the age of 5 are more likely to drown in a backyard pool than any other group. In most cases the child inadvertently gets out of the house because a door or entry way has been left open or unlocked. This is usually the case of human error. The parents or pool owners thought the door was locked but someone else – often another adult or older child opened it.

The best of intentions were there but human error led to the drowning.

The Lifesaving Society collects data on drownings from provincial and territorial coroner's offices. Backyard pools is the most common setting for drownings of children 0-4 years. It is difficult to obtain detailed fence and gate information from backyard pools drowning cases. The 2017 Canadian Drowning Report informs that, in cases where this information was available, 40% of the pools had no fence present or a non-compliant fence and 77% had either no gate or the gate was neither self-closing nor self-latching.

As the authority in drowning prevention, the Lifesaving Society is often asked to comment on these terrible tragedies, when the media call for an interview.

As the media spokesperson for the Lifesaving Society, I am often asked to provide some insight about how such a tragedy could occur and how it could be prevented.

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There are almost always two answers: 4 sided fencing around the pool area and “within arms’ reach supervision of children when they are in the pool area.

The Lifesaving Society supports the maintenance of the 4-sided fence bylaw. The Lifesaving Society believes that four-sided fencing offers the greatest level of protection to children less than six years of age, the group most likely to drown in backyard pools. This position is supported by the World Health Organization (WHO) in the 2014 Global Report on Drowning. This report identifies 10 Actions to Prevent Drowning. Installing barriers and controlling access to water is one of the 10 preventative actions.

4 sided fencing is the most effective strategy for the following reasons.

- It is an “passive” measure to ensure protection of the child
- It does not require human behaviour to work.
- Fencing that isolates the swimming pool from the home is widely acknowledged as the most effective method of prevention access to the pool area.

It is important to reinforce the fact that we are talking about protecting young children who are unable to protect themselves. It is society’s responsibility through government to protect children from harm. They are too young to protect themselves. It is not their fault if they get into a pool area

The Lifesaving Society supports the staff recommendations that safety should be a priority over many other concerns including aesthetics, convenience and cost

The Lifesaving Society supports the staff recommendation that four-sided pool fencing is the single most effective safety measure with respect to preventing young children from unintentionally accessing swimming pool area.

All other types of protection are less effective than four-sided fencing and therefore should not be considered as alternatives.

The Lifesaving Society’s work for over 100 years has been directed at promoting the safety of Canadians when they recreate around water.

This by law is an important step to assist in preventing these tragedies from occurring to our most vulnerable group – young children and it should be maintained.

Kind Regards,



Barbara Byers

Public Education and Research Director