



Committee Report

To: Warden Mitch Twolan
Members of the Executive Committee

From: Sandra Datars Bere
Chief Administrative Officer

Date: July 2, 2020

Re: Anaphylaxis 'Nut-Aware' Policy and Supporting Materials

Staff Recommendation:

That the Anaphylaxis 'Nut-Aware' Policy be approved; and,

That staff, through a phased approach, take the necessary steps to implement the policy in the Bruce County Museum & Cultural Centre and all County operated Library Branches within the County of Bruce.

Background:

In February, Executive Committee provided direction to staff to continue to pursue and develop a County-wide 'nut-aware' policy, for library branches and the museum, in order to comply with the Policy on Ableism and Discrimination which recognizes Anaphylaxis as a disability under the Humans Rights Code, R.S.O. 1990, c. H.19 (Code) and the Canadian Human Rights Act, R.S.C., 1985, c. H-6. Over the past several months the County's working group, including the County Solicitor, has undertaken significant research towards understanding the legislative environment, previous case law and other matters relevant to formulating this draft policy and supporting materials - presented today for Committee's consideration.

Policy Overview:

In order to recognize the most common allergen of nuts which causes anaphylaxis and accommodate those with this condition, who enjoy both the County Museum and County operated Libraries, a County-wide 'nut-aware' policy has been recommended by the County's Solicitor. A 'nut-aware' policy does not guarantee the County's Facilities will be free of nuts or nut products but rather is intended to raise awareness and encourage voluntary compliance.

The policy (Attachment 1) includes the following key elements:

(3) Scope

- This Policy applies to the Bruce County Museum & Cultural Centre and all County operated Library Branches within the County of Bruce referred to as "Facilities".

(4) Procedures and Responsibilities - Reducing the Risk of Exposure

- All reasonable efforts will be made to control the environment at these Facilities in order to minimize the exposure to Nuts. This must be a collaborative process which involves parents/guardians, facility staff and all users.

(5) Communication Strategy

- Education and awareness
 - In the facilities, when registered programs are provided to children the County shall ensure that organizers discuss allergen awareness with children.
 - Information advising that the programs at the Facilities are Nut-Aware shall be made available to all registrants when enrolling in programs (Attachment 2a & 2b).
 - This Policy will be available to community members on the County website: <https://brucecounty.on.ca/anaphylaxis-policy> and redirected to this site from the Museum & Library sites.
- Signs and Notices
 - Nut-Aware signs/notices will be posted and maintained (Attachment 3a & 3b). A lot of thought has gone into the wording and picture on the signs taking into consideration users range in age, education and languages. The signage is intended to be clear to all.

(6) Parents/ Guardians Responsibilities

- All parents/guardians with children registered in a County operated programs who are known to be at risk of Anaphylaxis are required to notify the County of their child's condition and fill-out and provide an Individualized Plan (Attachment 4).

(7) Individualized Plans

- Individualized Plans shall include appropriate details (i.e. type of allergy, monitoring/avoidance strategies and appropriate treatment).

(8) Training Procedures

- Staff are to be advised of all children registered in their programs who have Anaphylaxis.
- Staff are not required to administer an Epi-pen.
- Appropriate County staff will be trained on the proper administration of an Epi-Pen so they can assist someone in an emergency situation (i.e. person unable to and if/when directed by emergency personnel).

(9) Exemptions

- This Policy does not apply to Private Events to which the public is not invited (i.e. weddings, birthdays, facility rentals, etc.).
- This Policy does apply to Public Events, however, organizers can apply for an exemption to the Policy to the Chief Administrative Officer (CAO) - the exemption form (Attachment 5) will be available on the County site.

Next Steps:

If approved by council, the working group will take the necessary steps to implement the policy, through a phased approach, in the Bruce County Museum & Cultural Centre and all County operated Library Branches within the County of Bruce. The working group has already prepared an implementation plan and developed the required forms and signage so the phasing in can start immediately, if approved. Training of staff will be rolled out in a few months and become part of the regular training.

Financial/Staffing/Legal/IT Considerations:

Total legal costs equal - \$10,559.85 (covered under the CAO's 2020 budget). Additional costs relating to implementing the policy including signage production, awareness materials, and staff time for training, communication, and implementation are expected.

Interdepartmental Consultation:

Interdepartmental consultations were held with the Museum, Library, Human Services, Workplace Engagement Services, and the Office of the CAO.

Link to Strategic Goals and Elements:

Goal #3 - Find creative ways to engage our public - community stakeholder consultation

Element B - Engage in cross-departmental streamlining - specialize in the solution not the department

Goal #6 - Explore alternate options to improve efficiency, service

Written by Cathy McGirr, Director, Museum & Cultural Services, Brooke McLean, Director, Library, Kathy Johnston, Early Years Supervisor, Human Services and Matt Meade, Corporate Strategic Initiatives Specialist, Office of the CAO.

Approved by:

A handwritten signature in black ink, appearing to read 'Sandra Datars Bere', written in a cursive style.

Sandra Datars Bere
Chief Administrative Officer