
Title: Anaphylaxis Policy

Department/Division: Facilities

Purpose:

1. To provide procedures for the management of Anaphylaxis due to nuts, as defined below, in recreation facilities owned by the City of Owen Sound (the "City") being both the Julie McArthur Regional Recreation Centre and the Harry Lumley Bayshore Community Centre (Recreation Facilities) in order to comply with the Policy on Ableism and Discrimination ("Policy on Ableism") which recognizes Anaphylaxis as a disability under the *Human Rights Code*, R.S.O. 1990, c. H.19 ("Code") and the *Canadian Human Rights Act*, R.S.C., 1985, c. H-6.
2. The Policy on Ableism recognizes a legal responsibility for service providers to accommodate people with potentially life threatening allergies, as they would any other person with a disability, to the point of undue hardship. This requires responsible parties to maintain accessible, inclusive, discrimination and harassment-free environments that respect human rights.
3. This Anaphylaxis Policy ("Policy") addresses one of the most common allergens: Nuts.
4. The City has committed to phase in a program whereby nuts and products which have nuts listed as an ingredient will not be sold by any vendors at the Recreation Facilities. As well the City will take actions to educate the general public about Anaphylaxis and make the public aware of the City's policy to not sell Nuts or Nut Products and not to bring Nuts or Nut Products into these facilities.

Scope:

5. This Policy applies to the City owned Recreation Facilities, the Harry Lumley Bayshore Community Centre and the Julie McArthur Regional Recreation Centre. This Policy applies both to programs administered by the City and Third Parties. Users of these facilities must comply with this Policy.

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6. This policy does not apply to the Christie and Hare Rooms or the Bay and Sound Rooms at the Bayshore Community Centre where these rooms are being used for a private function as outlined in this policy.
7. Even if Third Parties have exclusive control over the type of Food Services that they provide, the City recommends that they consider this Policy and cater to the needs of those with Anaphylaxis due to Nuts in order to fulfill their legal duty to accommodate.

Definitions:

8. For the purposes of this policy,

Anaphylaxis: is a severe systemic allergic reaction which can be fatal, resulting in circulatory collapse or shock.

Anaphylactic Reaction: signs and symptoms of Anaphylaxis can occur within minutes of exposure to an allergen. In rarer cases, the time frame can vary up to several hours after exposure. The ways symptoms appear can vary from person to person and from episode to episode in the same person.

Symptoms of Anaphylaxis: generally include two or more of the following body systems: skin, respiratory, gastrointestinal and/or cardiovascular. However, low blood pressure alone, in the absence of other symptoms, can also represent Anaphylaxis.

- Skin – hives, swelling (face, lips, tongue), itching, warmth, redness;
- Respiratory (breathing) – coughing, wheezing, shortness of breath, chest pain or tightness, throat tightness, hoarse voice, nasal congestion or hay fever-like symptoms (runny, itchy nose and watery eyes, sneezing), trouble swallowing;
- Gastrointestinal (stomach) – nausea, pain or cramps, vomiting, diarrhea;
- Cardiovascular (heart) – paler than normal skin colour/blue colour, weak pulse, passing out, dizziness or light-headedness, shock;

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- Other – anxiety, sense of doom (the feeling that something bad is about to happen), headache, uterine cramps, metallic taste.

Epinephrine: is the synthetic form of the hormone adrenaline that is used as the treatment or drug of choice to treat Anaphylaxis and life-threatening asthma attacks. This treatment is live-saving.

Epinephrine Auto-Injector: a medical device that is used to deliver a pre-measured dose (or doses) of Epinephrine. Also known as an “epi-pen”.

Food Services: includes making, transporting or selling food products. This includes services such as catering, concession stands, bistros, restaurants and vending machines. This list is non-exhaustive.

Third Parties: includes those individuals, businesses and organizations, including but not limited to the YMCA of Owen Sound Grey Bruce and the Owen Sound Attack Inc., that have entered into an agreement/contract with the City to provide programs/services, rent/lease space, or otherwise carry on business which includes the provision of Food Services within the City’s Recreation Facilities.

Nuts: means as stated by Health Canada the priority nuts of concern are peanuts, tree nuts (almonds, Brazil nuts, cashews, hazelnuts, macadamia nuts, pecans, pine nuts, pistachio nuts and walnuts).

Procedures and Responsibilities:

Reducing the Risk of Exposure

9. All reasonable efforts will be made to control the environment at these Recreation Facilities in order to minimize the exposure to Nuts. This must be a collaborative process which involves parents/guardians, City staff, facility users, community members, and Third Parties.
10. While the City and Third Parties shall take all reasonable efforts to accommodate children with Anaphylaxis due to Nut allergies, there is no legal responsibility to reduce the risk of exposure to zero. Despite best efforts, the City and Third Parties cannot guarantee a 100 percent Nut-free environment.

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Communication Strategy – Education and Awareness

11. In the City's Recreation Facilities which provide programs to children under 14 years of age in which the parents/guardians have advised the City or Third Parties that their child has a potentially life threatening allergy (anaphylaxis) to Nuts the City shall ensure that if managed by City staff that City staff discuss allergen awareness with children, encourage children not to share lunches or trade snacks, monitor those children who have known allergies while eating, and reinforce the importance of proper hygiene and effective hand-washing. If these programs are administered by Third Parties, who are required to comply with the City's policies, the City shall make the Third Parties aware of this Policy and the requirement for education and awareness. Pamphlets indicating that the City's Recreation Facilities are nut-aware shall be made available to all registrants when enrolling in programs and to community members in general by way of posting this Policy on the City's website.

Communication Strategy – Signs and Notices

12. The City shall ensure that signs/notices are posted in the City's Recreation Facilities that these Recreation Facilities are "Nut-Aware". Additionally, as the City cannot guarantee that food products that are sold within these Recreation Facilities have not come into contact with Nuts, or that every member of the community respects this Policy, the City shall post signs/notices which indicate that certain products "may have come into contact with nuts or nut products".
13. The City is responsible for implementing a strategy to ensure that signs/notices are consistently in place. Where a sign is damaged or removed, the City shall have staff post a new sign or notice.
14. In addition to these signs, notices shall also be provided directly to parents/guardians when registering children for programs at the City's Recreation Facilities that these facilities are "Nut-Aware". This will be in the form of a pamphlet or newsletter.

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Parents/Guardians Responsibilities

15. All parents/guardians with children who are known to be at risk of anaphylaxis are required to notify the City and/or Third Parties in writing of their child's condition and provide all relevant information required by the City to properly accommodate their child's needs to the extent reasonably possible. This information should include: the identified allergens, the severity of the allergy, any past incidents of Anaphylactic Reactions, current medications, changes to diagnoses/medication and any other relevant health considerations. If the child has been prescribed an epi-pen the child shall self-carry at all times.
16. All parents/guardians with children not known to be at risk of anaphylaxis should also ensure that they are complying with this Policy and encouraging their children to respect children with Anaphylaxis. Where applicable, parents/guardians should ensure that their children are only bringing safe food products (i.e. no nut products or products that list nuts in the ingredient list) into the City's Recreation Facilities. To assist with compliance with this Policy by children without anaphylaxis a pamphlet explaining this Policy will be provided to everyone who registers for programs at the City's Recreation Facilities for which the City is either administering the programs or the City has the right to require compliance by Third Parties with this Policy.

Individualized Plans

17. In circumstances where the City/Third Parties has been made aware of an anaphylaxis child, and the City is administering the program the child is enrolled in or the Third Party is required to comply with this Policy, the City/Third Parties shall develop an individualized plan with the input of the parent/guardian of the anaphylaxis child. This plan shall include:
 - a. A completed individualized plan form.
 - b. Details informing appropriate employees and others who are in direct contact with the child on a regular basis of the type of allergy,

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monitoring and avoidance strategies and appropriate treatment.

Details include:

- Name, identifying information, photo of the affected child;
 - Specific allergy/allergies;
 - Signs and symptoms of an accidental exposure;
 - Medication to be administered in the event of an exposure.
- c. A readily accessible emergency procedure for the child, including the requirement to self-carry an Epinephrine Auto-Injector, follow-up plans (i.e. calling 911 or transporting to hospital), and emergency contact information.

Training Procedures

18. Program managers shall ensure that appropriate employees are advised of all children registered in their programs who have Anaphylaxis. The City shall include training on how to recognize an Anaphylactic Reaction and the proper administration of an Epinephrine Auto-Injector when health and safety training courses are offered. The City will also notify Third Parties of these training opportunities and allow interested Third Parties to participate. City staff shall be informed of the emergency protocol that has been developed. Staff will not be required to administer an epi-pen but will be trained on the proper administration of an epi-pen so they can assist someone in an emergency situation if the person is unable to administer the epi-pen themselves and when directed to do so by the 911 operator.

Jurisdictional Matters and Third Party Lease Agreements

19. Within the areas and programs in the City's Recreation Facilities that are administered by Third Parties with agreements/contracts the City may not have jurisdiction or authority over the type of food that is served. Where the applicable agreement/contract states that the provision of Food Services by the City, and Third Parties, including user groups, shall be subject to the

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City’s licencing by-laws and related policies for such services, the program provider is required to adhere to the provisions contained within this Policy.

- 20. Where Third Parties are independently responsible for the provision of Food Services within their respective areas, and have exclusive use/control, it is recommended that they comply with this Policy. If a Third Party decides that they wish to continue to provide nuts and nut products, the City does not assume responsibility as the City does not have legal jurisdiction to enforce compliance. All Third Parties will be provided with a copy of the City’s Policy and a request that they comply.

- 21. This Policy does not apply to private events and short-term functions e.g. weddings for which the party renting a portion of the Recreation Facilities has their function catered and takes full responsibility for accommodating the guests which they include in their event. If the organizer of a special event wishes to include nut or nut products in their event there is an exemption process available which will include a requirement to pay for the additional costs for cleaning the location of the function after the event.

Related Policies & Legislation:

- 22. Policy on Ableism and Discrimination Based on Disability (2016)
<http://www.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability>

Revision History:

By-law Number	Date
2017-040	March 20, 2017