



TOWN OF
HALTON HILLS
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MEMORANDUM

TO: Mayor Bonnette and Members of Council

FROM: Erin Carter, Recreation Coordinator - Children

DATE: December 13, 2021

MEMO NO.: RP-2021-0007

SUBJECT: Inclusive Recreation

PURPOSE OF THE MEMORANDUM:

The purpose of this memorandum is to update Members of Council regarding inclusive recreation in Halton Hills.

BACKGROUND:

Inclusion is embedded at the core of the Town's mission and values. The Town of Halton Hills strategic plan strives to ensure healthy lives and promote the well-being of all residents, along with ensuring inclusive and equitable opportunities. One of the Top Ten Strategic actions from the Recreation and Parks Strategic Action Plan is to provide basic recreation opportunities for all and minimize barriers to participation. The strategic plan also highlights the need to increase inclusion and access to recreation for populations that face constraints.

Town of Halton Hills invites all people to access facilities, services and programs, while recognizing that individuals with a disability may face unique access barriers. Staff of Town of Halton Hills' Recreation and Parks Department strive to ensure our facilities, programs, and services are accessible and available to meet the diverse needs of our citizens.

The Inclusion Policy is designed to:

1. Promote a fair and equitable process for every resident to successfully access and participate in Town recreation programs and services.
2. Ensure community programs and services provided by the Recreation and Parks Department are accessible and available to meet the diverse needs of our citizens, resulting in people of all abilities enjoying the benefits of recreation.

Inclusive recreation is encompassing of all individuals, whether they have a disability or not. Adapted/Specialized recreation occurs when a program has been modified to meet the needs of a specific group of participants. The Town does offer a limited number of specialized opportunities targeted to adults with special needs (e.g., baseball, soccer, T.I.M.E. and aquafit).

The Recreation and Parks Inclusion Policy was last updated in 2013. Staff have been reviewing current practices, researching demographic information and best practices to create an updated and current policy.

COMMENTS:

The purpose of this memo is to provide Council with an update on the following information regarding inclusive recreation in Halton Hills:

- a) Halton Hills demographics & trends
- b) A summary of the current Inclusion Policy and level of service
- c) Challenges when providing inclusive recreation
- d) Application of legislation
- e) Summer Camp 2021
- f) Next Steps

Halton Hills Demographics & Trends

Based on 2018-2019 data from the Ministry of Education, 13% of children (4–13 year olds) in Halton Hills require special education support within elementary schools. The 2016 Census data reported that 13.39% of children (0-14 year olds) in Halton Hills have one or more limitations (Limitations could be classified as challenges related seeing, hearing, physical, cognitive, mental health or other medical needs).

In 2019, 181 individuals requiring inclusion support were registered across all Town of Halton Hills programs. The need for inclusion support in summer camp has steadily increased in recent years. In 2019, there were 4.72% of total registration required inclusion support over the course of the summer. During the summer of 2021 there were 65 program registrations with inclusion support, which was 6.21% of total program registration.

Compared to Halton Hills demographics (13%), the Town is only serving a portion of children within the community with limitations. With the anticipated growth coming to Halton Hills, the corporation needs to be aware of the growing trend and prepared for the future impact of providing inclusion support within our programs.

Inclusion Policy & Level of Service

The Inclusion Policy outlines practices that help to ensure barrier-free services for persons with a disability or special need participating in a Recreation and Parks Department program or service.

The Town welcomes participants requiring interpretive services, mobility and adaptive equipment needs and individualized support. This includes anyone with a physical or developmental disability either congenital or resulting from an injury or illness. Participants with a disability and special need are accommodated within the scope of expertise of the recreation staff.

The Department strives to reflect these values in all programs and services:

1. Equitable – All persons with a disability must be given an opportunity equal to that given to others to obtain, use and benefit from Town of Halton Hills Recreation and Parks program and services.
2. Respect & Dignity – Recreation and parks services must be provided in a manner that respects the confidentiality, dignity and independence of persons with a disability.
3. Integrated Approach – Town of Halton Hills is committed to creating a culture of inclusion where all programs and services are offered in an integrated and universal manner. Specialized programming shall be introduced when appropriate for persons with a disability as a progression to integrated settings or when no other programming offered meets their needs.
4. Consult, Evaluate & Report – The Town works to continuously monitor and evaluate our efforts to provide accessible programs and services for everyone. The Town welcomes persons with a disability to provide input on program design and services and works with the Accessibility Advisory Committee to ensure our approach is both efficient and effective.

The various supports provided by the Town of Halton Hills Recreation and Parks Department fall within three categories:

1. Mobility and Adaptive Equipment Supports - Department program staff members adapt programming or provide assistive equipment allowing the person with a disability to participate in a program.
2. Interpretive Supports - Department staff members communicate with customers in a manner that considers the person's ability. Individual with hearing impairments may request the support of a sign language interpreter.

3. Individualized Support

- a) Town-Provided Support - Department staff members provide one-to-one support and/or extra supervision and, where available, utilize community partners to develop an individualized participation plan.
 - This is the most utilized type of support. This level of support is provided by recreationally trained staff (typically paid \$15-\$16/hour). Predominantly our staff within this role are between 15-25 years old. Some staff are pursuing work in developmental services and/or have a personal interest in this type of work. No formal certification or requirement for Inclusion Facilitator role. Summer Camp staff training includes approximately 3-4 hours of training related to inclusion and behaviour management.
- b) Participant-Provided Support - The Town recognizes that there are situations where a person with a disability or special need has developed relationships with individuals who are familiar with their specific situation and able to provide the types of supports they require in a community-based program. Individuals who wish to participate in drop-in, registered or membership programs can apply for a "Rec Partner".

A Rec Partner is an individual who:

- Accompanies a person with a disability to provide one-on-one assistance that is not provided by program instructors
- Supports the person with a disability in program participation
- Provides full supervision throughout the entire program
- Behaves in a manner that supports a positive program experience for all participants in the program.
- For aquatic activities, the Rec Partner is comfortable, and behaves safely, in the water.
- For care programs, provides a Police Security Clearance – Vulnerable Sector Screening.

The Town of Halton Hills is committed to providing the best quality of programming and support for individuals with special needs. To date, programs have been able to serve the need within the community with minimal waitlists and barriers. There are no additional costs for the additional support within programs. There is no limitation on the amount of participation per participant. Participants can register for multiple programs/sessions.

Staff work closely with families to understand accommodations and support required, and pair staff accordingly. To date, there have been no Human Rights complaints or work refusals. Staff strive for excellence and are dedicated to their roles. Our staff continue to build knowledge and capacity within service area teams (e.g., Behaviour Management System Training).

The Accessibility Committee helps staff to remain up to date with resources and connected to related professionals. Council has always provided approval and financial backing to continue to provide inclusion support, even with increased budget expenses each year.

Challenges when Providing Inclusive Recreation

As a municipality, we remain confident in seeking to provide equal opportunities for all. However, it is important that the corporation is aware of the challenges, level of risk and sensitivities to human right issues.

Although the level of support provided by Town of Halton Hills staff is defined in the Inclusion Policy, it is a challenge to translate it smoothly into daily practice. Staff discuss to what extent programs should be adapted to provide integration verses providing respite care. Additional staff training is required to standardize the level of support provided within programs.

Currently there is no limit to the amount of support the Town provides (e.g., the number of participants each session/week). This can be a challenge from a staffing perspective. It may also become challenging to sustain with future community growth. Neighbouring municipalities maintain a capacity limit for inclusion support (e.g., In a typical year, Oakville and Milton offer approximately 20 spaces each week of the summer).

There is a large financial impact to provide inclusion support. Over the past four years, the need for inclusion support has steadily increased. Additional training and certifications (e.g., frontline staff and supervisors) are required for staff to remain knowledgeable and current.

Over the past several years, front line staff have been experiencing increasing levels of complexity of behaviour and aggression while supporting individuals within our programs. This complexity in serving individuals with special needs is being experienced across the recreation sector (including regional partners) as well as in education and child-care settings. Over the past several years Town of Halton Hills staff, who have been working as Inclusion Facilitators have experienced scratches, pinches, hits and bites (all documented through injury reporting - WSIB form 7). Some of our regional partners have experienced varying scenarios of litigation, litigation threat, staff injury (e.g., concussions from being hit) and staff action (work refusal). As these complexities are becoming more common and difficult, staff (and regional partners) are challenged to comply and wade through some of the grey areas of legislation to decrease the risk to the Town.

Finally, there are inconsistencies across municipalities (e.g., costs for services, training, number of opportunities available, ages served etc.). Within the recreation sector, we are looking for consistency in how we approach providing services in this area. Parks & Recreation Ontario is working on developing a framework to identify gaps and align practices.

Application of Legislation

Several pieces of legislations govern the management of inclusive services, including but not limited to: Occupational Health & Safety Act, Child, Youth and Family Services Act, Criminal Code and Education Act and the Human Rights Code. It is challenging to navigate these various legislations. Neighbouring municipalities have experienced varying scenarios of litigation and litigation threat.

In November of 2020, municipalities across Ontario were invited to participate in an educational session with a Human Rights Lawyer and hosted by Parks and Recreation Ontario. During this two-hour meeting, the lawyer provided insight into the Ontario Human Rights Code, and clarity on issues facing municipalities as part of the review of current practices.

The municipality's Duty to Accommodate all participants within our programs, to the point of undue hardship, was the key message and take-away from the session. Undue hardship is based on two factors; cost and health & safety.

- Cost – Undue hardship is based on the entire corporation, not the program budget. It was suggested that a municipality would be unable to demonstrate undue hardship based on cost. If participants' needs are outside of the scope of staff expertise, it is expected that the municipality would provide additional training for staff or bring in professional support (PSW, Therapist, etc.), at the municipalities expense, for the participant to attend program.
- Healthy & Safety – Municipality has an obligation to protect health & safety of other participants and employees. Therefore, there is a fine balance the two perspectives.

If a claim was brought forward to the Human Rights Tribunal of Ontario, the Town would be asked to provide:

- Financial statements and budgets (municipality wide)
- Scientific data, information and data resulting from empirical studies
- Expert opinion
- Detail info about the activity and requested accommodation
- Information about the conditions surrounding the activity and their effects on the person or group with a disability

Therefore, as a municipality reaching the point of undue hardship can be a challenge. Although we haven't had any threats of litigation raised to date, we will need to align our practices.

Summer Camp 2021

The review of Human Rights legislation, a low response to the recruitment of summer camp Inclusion Facilitators, and the COVID-19 pandemic expedited the need to review inclusion procedures for summer camp programs.

The Inclusion Facilitator position was re-evaluated and resulted in the creation of a higher-rated Professional Instructor – Inclusion position with enhanced educational and skill requirements. Six qualified Educational Assistants were hired paid at a competitive hourly wage (\$25/hour). The Professional Instructor – Inclusion increased the quality of support within care-programs. Participants were truly integrated into summer programs. Extremely positive feedback was heard from participants, families and staff members. The Town was able to dedicate 6% of registration spaces to children requiring inclusion support (e.g., seven inclusion support spaces were offered each week) in summer 2021.

CONCLUSION:

Staff remains committed to providing the best quality of inclusive recreation and supporting individuals with special needs within the community. In 2022, the focus will continue to develop best practices, align with Parks and Recreation Ontario, network with neighbouring municipalities and related organizations, standardize staff training resources, and improving access to programming and update Town of Halton Hills Inclusion Policy for future business planning.

Reviewed and approved by,

Samantha Howard, Director of Recreation Services

Warren Harris, Commissioner of Recreation and Parks

Chris Mills, Chief Administrative Officer