



Policy: Anaphylaxis 'Nut-Aware'

Department: Office of the CAO

Effective Date: July 2, 2020

Revision Date(s):

Review Date:

(1) Purpose

To provide procedures for the management of Anaphylaxis in the Bruce County Museum & Cultural Centre and all County operated Library Branches within the County of Bruce referred to herein as (Facilities). This policy has been created 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.

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 living with a disability. This requires responsible parties to maintain accessible, inclusive, discrimination and harassment-free environments that respect human rights.

While Anaphylaxis can result from a number of known allergens, there is a specific emphasis in this Anaphylaxis 'Nut-Aware' Policy on one of the most common allergens: nuts and nut products.

The County is committed to phasing in a program whereby Nuts (as defined below) will not be sold at the Facilities. As well the County will take actions to train staff and educate the general public about Anaphylaxis and make the public aware of the County Policy to not sell Nuts and not to have Nuts brought into the Facilities, unless an exemption has been provided.

As the facilities are public open spaces, the County cannot guarantee that anyone using the Facilities will not have come into contact with nut products, and the library cannot guarantee

that books or other library materials have not come into contact with nut products. Signs will be posted requesting that the public adhere to this Anaphylaxis 'Nut-Aware' Policy.

(2) Definitions

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 way 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;
- 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 can be 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".

Exemption Request: if any organizer, including County staff, wish to have a Public Event at any of the Facilities, open to the general public, which cannot comply with this Policy to not directly sell or serve Nuts an exemption request can be submitted to the Chief Administrative Officer (CAO). A condition of any exemption may be a fee for additional cleaning following the event, where necessary. If an exemption is granted it is from this Policy and not from the legislative requirement to comply with the Policy on Ableism.

Exemption: Private Events at the Facilities shall be exempt from this policy if: i) the events are private, ii) the general public is not invited; and iii) the organizers are responsible for the provision of food. All users of the County Facilities will be advised of this Policy and encouraged to comply.

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

Nuts: 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). This Policy refers to nuts and products that list nuts as an ingredient only. It is note that it cannot be guaranteed products without nuts listed as an ingredient have not come into contact with nuts.

Private Events: use or rental of part or all of a Facility for an event in which food is sold or served for to which the general public is not invited.

Public Events: use or rental of a portion of or the full Facility for an event in which food is sold or served for which the general public is invited.

(3) Scope

This Policy applies to the Facilities within the County. This Policy applies to the general public's use of the Facilities and to programs administered by the County for which children are registered.

While there is an exemption for Private Events, the County recommends that all users consider this Policy and cater to the needs of those with Anaphylaxis in order to fulfill their legal duty to accommodate.

(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 users.

While the County shall take all reasonable efforts to accommodate children with Anaphylaxis, there is no legal responsibility to reduce the risk of exposure to zero. **Despite best efforts, the County cannot guarantee a 100 percent Nut-free environment.**

(5) Communication Strategy

(i) Education and Awareness

In the Facilities, where registered programs are provided to children (in which the parents/guardians have advised the County that their child has a potentially life threatening allergy -Anaphylaxis) the County shall ensure that organizers discuss allergen awareness with children, encourage children not to share lunches or trade snacks and reinforce the importance of proper hygiene and effective hand-washing.

Information advising that the programs at the 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 County website and direct by way of signage at each Facility.

(ii) Signs and Notices

The County shall ensure that signs/notices are posted in the Facilities to provide public notice

that these Facilities are “Nut-Aware”. Additionally, as the County cannot guarantee that outside food products that are sold within these Facilities have not come into contact with nuts, the County shall post signs/notices where food is sold which indicates that certain products “may have come into contact with nuts or nut products”.

The County shall implement a strategy to ensure that signs/notices are consistently in place. Upon notification that a sign/notice is damaged or removed the County shall have staff post a new sign/notice.

(6) Parents/Guardians Responsibilities

All parents/guardians with children registered in a County operated program 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 which is available on the County website. This Plan requires that all relevant information to properly accommodate their child’s needs, to the extent reasonably possible, be provided. If the child has been prescribed an Epi-Pen the child shall self-carry at all times.

All parents/guardians with children not known to be a risk of Anaphylaxis should also ensure that they are complying with this Policy and encouraging their children to respect children with Anaphylaxis. 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 Facilities.

(7) Individualized Plans

This plan shall include details appropriate for the organizers, and appropriate staff who are in direct contact with the child on a regular basis, of the type of allergy, monitoring/avoidance strategies and appropriate treatment.

(8) Training Procedures

Organizers shall ensure that appropriate employees are advised of all children registered in their programs who have Anaphylaxis. County staff shall not be 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, if the person is unable to administer the Epi-Pen themselves, and when/if staff are directed to do so by the 911 operator or appropriate emergency personnel.

(9) Exemptions

This Policy does not apply to Private Events i.e. weddings/birthdays, meetings for which the organizer renting/using the Facilities provides or sells food products and takes full responsibility for accommodating the guests which they include in their Private Event.

Organizers of Public Events can apply for an exemption to the Policy to the Chief Administrative Officer. The exemption application must provide the event details and an explanation as to why the Policy cannot be complied with. The exemption form can be found

on the County Website. If an exemption request has been approved a notice will be required to be posted during the event advising the general public of the presence of Nut products. This notification must also be included in all marketing/promotional materials.

Event organizers will be advised of the County's desire for the Facilities to be Nut-Aware and encouraged to comply with this Policy to the extent possible.

(10) Supporting Material

Policy on Ableism and Discrimination Based on Disability (2016)

<http://www.ohrc.on.ca/en/policy-ableism-and-discrimination-based-disability>