

Recommendations to the Ministry of Education

RE: Risk Management Policy for Water Based Physical Health and Outdoor Education Activities

This document was developed by a group of concerned individuals and organizations represented by the Get Kids Paddling Initiative in order to make recommendations to the Ontario Ministry of Education and those concerned with policy development surrounding outdoor education in Canada. The Get Kids Paddling Initiative was formed to create opportunities to get more students safely into nature, through the various forms of paddling. We believe that, paddling, especially canoeing and canoe tripping is an integral part of our Canadian culture and heritage and should be accessible to all Canadian students.

Currently, Ontario schools and Public-School Boards who offer offsite paddling related excursions and day trips are directed by the Ministry of Education to rely heavily on third-party guidelines from the Ontario Physical and Health Education Association (OPHEA), and site and waterfront-specific accreditation standards accredited by the Ontario Camps Association (OCA). Both of these third-party organizations are intended to help keep students safe while participating in approved paddling activities. However, many of the third-party guidelines are restrictive in regards to their social, cultural, and ability based considerations. Our goal is to ensure that revisions are made and any forward momentum increases safety and balances the access to paddling for Ontario students.

Specifically, a critical look at the OPHEA Safety Guidelines is needed. It has been made abundantly clear through conversations with OPHEA representatives, School Board principals and teachers, outdoor education site Directors, and paddling event organizers that OPHEA does little continuous outside consultation with regional paddling experts and outdoor education organizations in the formulation and maintenance of the Ontario Safety Guidelines. Significant questions need to be asked when a ministry approves a third-party accreditation scheme or a standards based governing body without requiring industry consultations or the opportunity for external reviews. Furthermore, it is becoming clear that guidelines set by OPHEA are not based on contemporary data, do not consistently reflect the best practices of the paddling industry, and do not consider equity in student participation.

Recommendation #1: Create an advisory group for the development of policy for paddling, water, and outdoor education activities that includes OPHEA, industry experts, educators, and service providers as active contributors.

Recommendation #2: Ensure that new policy promotes the inclusion of students from all cultural, economic and industry backgrounds, promoting safe access to paddling, water and outdoor education activities for all students in Ontario.

As vested members of the paddling and outdoor education communities, we believe it is important to realize the impact that minimum guidelines have on the overall risk management and safety of our industry. The first consideration is that minimum guidelines/standards level the playing field for what all operators must meet to take students paddling. Setting minimum guidelines/standards often reduces the actual risk management practices that are enacted by high-level operators and organizations. Two, minimum guidelines/standards slowly become the standard within the industry for what must be adhered to for lessons, risk management, ratios,

best practices, instructor qualifications, etc. Both of these situations restrict the forward momentum that is imperative and helps the advancement of strong risk management within the paddling and excursion communities. It is well known amongst outdoor education and paddling practitioners that risk management is not a static discipline, rather risks and the techniques used to mitigate those risks are contextual and are constantly evolving with time. While minimum standards based on best practices should exist it is crucial that there be a process for consistent input, review, and revision that comes from those actively delivering paddling lessons and excursions.

Recommendation #3: Ensure that minimum guidelines are broad enough to cover most contexts and there is a process for constant review and revision.

In light of the drowning tragedy that occurred this past summer and other drowning deaths in Ontario lakes and rivers over the past decade, there are three key areas that should be highlighted in any review of risk management policies related to water based activities:

Swim Tests – Swim tests have been the initial screening mechanism for participation in paddling related excursions and activities as per the OPHEA guidelines. With changing ethnic and cultural dynamics across Ontario, the OPHEA guidelines limit participation in paddling activities for large portions of our constantly changing population. Swimming ability is often related to both social-economic status and cultural orientation. Given these considerations, it is important to note that swim tests do not prevent drowning. The overreliance on swim test information as the primary risk mitigation tool for paddling related activities is flawed and inconsistent with outside industry practices. Having student swimming ability information is helpful for paddling instructors and excursion leaders to create specific care plans or to adjust their planning appropriately but should not be used as a screening tool to determine participation.

Recommendation #4: Eliminate the swim test as a pre-requisite to participate in paddling, non-swimming based water activities, and outdoor education activities, in conjunction with recommendation 5) (see below).

Personal Flotation Devices – The two leading factors that help prevent drowning while participating in paddling activities (canoe and kayak) are PFD use and proper supervision. Wearing a properly fitting PFD on the water eliminates your chance of drowning due to swimming ability. A properly fitting PFD will float an individual regardless of their abilities as a swimmer. A series of tests that determine a participant's comfort and abilities in the water while wearing a PFD would be an appropriate way to determine if a non/weak swimmer should participate in water based activities like paddling. This type of assessment would be more representative of the actual situation a student might find themselves in during the course of a paddling experience and thus, would be a far more useful tool for determining participation in water based activity.

Recommendation #5: Mandate that personal flotation devices are to be worn for all paddling and outdoor education based 'swimming' activities, by all students regardless of swimming ability (with the exception of water activities taking place in a pool or lifeguard-supervised buoyed beach).

Proper Supervision – Students of all ages require supervision in and around the water, no matter their swimming ability. Appropriate supervision around the water, lifeguarding, and water rescue training are the second most effective risk mitigation technique that helps prevent drowning in lakes and rivers. Pool based certifications should not be considered the benchmark for supervising water based activities on open lakes and rivers. There are a number of lake and river-based certification programs that should be given equal precedence as those of The Lifesaving Society (Bronze Cross and NLS). Ratios of students to instructors/supervisors need to be properly considered and related to best practices within the paddling industry. Pool based and classroom-based standards as are currently required by OPHEA need to be reconsidered.

Recommendation #6: Recognize water safety and rescue programs focused on working on lakes and rivers as preferable training for paddling, water and wilderness activities. For example, Wilderness Water Safety (YMCA, Red Cross), River Safety and Rescue (Rescue 3 International, Rescue Canada, Boreal River Rescue, etc.)

The available data from the Lifesaving Society, previous Coroners Reports, and empirical research in regards to drowning suggests that PFD use and proper supervision are the leading risk mitigation tools that can be used to help prevent drowning during paddling related events and excursions. These points need to be heavily considered in the development of excursion and paddling related guidelines, or in evaluating the relevance of third-party accreditation and external guidelines. Currently, this data is not being reflected in OPHEA or OCA documentation.

In summary, we have made six key recommendations with this document for the Ministry of Education to consider in the evaluation of paddling excursion based guidelines and standards.

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- **Recommendation #2:** Ensure that new policy promotes the inclusion of students from all cultural, economic and industry backgrounds, promoting safe access to paddling, water and outdoor education activities for all students in Ontario.
- **Recommendation #3:** Ensure that minimum guidelines are broad enough to cover most contexts and there is a process for constant review and revision.
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- **Recommendation #6:** Recognize water safety and rescue programs focused on working on lakes and rivers as preferable training for paddling, water, and wilderness activities. For example, Wilderness Water Safety, River Safety and Rescue (Rescue 3 International, Rescue Canada, Boreal River Rescue, etc.)

We invite interested parties to be in touch regarding consultation with the various members of the Get Kids Paddling Initiative who are more than happy to share their knowledge to help shape the future of safe and educative paddling opportunities for students across Ontario.

Response to this letter should be sent to the Risk Management Co-Chairs of the Get Kids Paddling Initiative:

- Adrian Meissner, adrian@theboundlesschool.com (Director of Operations, The Boundless School), and
- Dr. Ryan Howard, ryanhoward@aliveoutdoors.com (Director Research, Risk and Innovation, ALIVE Outdoors Inc.).

Sincerely,

Committed Members of the Get Kids Paddling Initiative