

CCEYA Regulatory Posting Forest/Outdoor programs submission: 2020

Preface:

As the Government of Ontario continues the important work of reviewing the Child Care and Early Years Act, it is particularly timely during this Pandemic to recognize the emerging trends and interest in outdoor and Forest and Nature School (FNS) childcare programs. It is from this perspective that the consortium of partners (Andrew Fleck Children's Services, Outdoor Play Canada and the Child Nature Alliance of Canada) prepared this submission responding to the invitation in the 2020 Regulatory posting to discuss Forest/Outdoor programs.

Recommendations:

Our recommendations for immediate next steps, that should be part of this Regulatory posting, are:

- That a pilot project be established to define forest and outdoor play programming and determine what standards, criteria and regulations are supportive and necessary.
 - Pilot project should take place in multiple areas throughout Ontario and include currently operating licensed and unlicensed programs.
- Allow toddler and preschool programs, where there is a fenced outdoor space with no climbing structure, to be outdoors at the beginning and end of the day with the existing allowable reduced ratios.
 - During any transition either inside or outside or to another location outside, staffing must be at 100% ratios.
- Allow Kindergarten and School Age programs, to be outdoors at the beginning and end of the day with reduced ratios if there is no climbing structure being used.
 - During any transition either inside or outside or to another location outside, staffing must be at 100% ratios.
- While not a recommendation for the Act *per se*, it is recommended that the Ministry authorize, support and assess demonstration programs designed to inform necessary standards, criteria and regulations.

Our justification for these recommendations is supported by the information shared below.



Steps taken:

On October 30th, 2020 Andrew Fleck Children’s Services (AFCS), Outdoor Play Canada and the Child Nature Alliance of Canada (CNAC) co-hosted an Ontario-wide Forum inviting stakeholders and community partners to share their knowledge, insights and experiences with and about forest and outdoor play programming for the early years. This forum brought together more than 50 leaders from across Ontario including educators, program directors, parents, researchers, and physicians who recognize the benefits to people, especially children, of spending more time outdoors. Additionally, staff from the Ministry of Education and local officials accepted the invitation to join, and welcomed the opportunity to hear participant’s thoughts on this important topic. Participants in this Forum were also invited to share their thoughts and provide feedback to be included in this submission.

What the panel of experts shared during the Ontario-wide Forum:

The Forum began with a summary of an environmental scan of Licensed Forest and Nature School programs, which demonstrated that there is a significant and growing number of licensed outdoor programs for preschool age children that have been established around the world, following models from Germany, Scandinavia, the UK and Washington (Washington State, 2019). The Washington Model provides valuable lessons and great insight into their journey to make licensing possible and successful for outdoor early learning and childcare programs.

In Canada, there are several provinces whose childcare visions include room for the FNS and outdoor learning approach, and have brought together local and international experiences, research, and stories from experts and leaders in the field. For example, Cloudberry Forest School in Newfoundland has received approval from their Department of Education to pilot a full day program.

In Ontario, there are several FNS programs that strive to adhere to the following pedagogical approach: regular and repeated access to the same natural space, as well as child-centered, interest-led, inquiry-driven, educator-supported, learning through play on the land (Child and Nature Alliance of Canada, 2019). These principles are very similar to the foundational, central principles of Ontario’s “*How Does Learning Happen?*” (2014).

Key Definitions:

At this time, several descriptors are being used to define programs and these may differ across the province and between programs. Some key definitions are:

- **Forest and Nature School programs (FNS):** These are programs rooted in the pedagogical approach defined by being child-centered, interest-led, inquiry-driven, educator-supported, learning through play on the land. **Forest and Nature School programs** can be found in national parks, forests, city parks, school yards, wild greenspace and farm fields and emphasize developing a relationship with the outdoor environment through regular and repeated visits.
- **Nearby-Nature programs** are programs that are aligned with FNS principles and take place in a natural space (forest, field, public green space or park) within walking distance of a school or childcare (rather than traveling to a forest elsewhere).
- **Outdoor programs** are programs that value and prioritize spending time outdoors that may or may not be aligned with the Forest and Nature School approach.

During the COVID-19 pandemic, local public health and Ontario Ministry of Education guidelines encourage educators to support and provide outdoor play as much as possible to reduce the risk of virus transmission. Although the Ministry already requires that all licensed childcare programs in Ontario spend time outdoors each day, the combination of the pandemic and ample research showing the positive impact of outdoor play on children’s learning, physical and mental development, and health has led to licensed outdoor early childhood programs generating increased attention and interest.

Evidence demonstrates that outdoor play is an important factor supporting healthy early childhood development. Providing more time outdoors allows for children to move freely and be more active. Every two years, ParticipACTION releases a report card grading children’s physical activity in Canada. In 2020, a D+ was assigned to overall physical activity for children, and an F was assigned for active play. Before the COVID-19 pandemic, only 15% of Canadian children and youth were meeting the minimum recommendations in the Canadian 24h movement guidelines. However, in April 2020, one month after the World Health Organization declared COVID-19 a global pandemic, less than 3% of Canadian children and youth were meeting these same guidelines, as shown in a nation-wide survey conducted by ParticipACTION in collaboration with Outdoor Play Canada and researchers from across Canada. From this survey it was also highlighted that children’s time spent outdoors and in outdoor play had decreased across all provinces, where the greatest decline was observed in Ontario. Outdoor Play Canada also released an evidence-informed statement entitled “*Should I go Outside during the Covid-19 era?*”, which highlights the mental and physical health benefits of spending time outdoors. Increasing active play time outdoors through licensed care is a way to help support children in re-engaging in active behaviors to promote their physical and mental health and well-being. This is important now in order to mitigate the impact of, and moving forward as we begin to think about promoting recovery from, this health crisis.

Supporting the FNS approach in licensed childcare settings, and increasing outdoor play time in general, is an important and worthwhile goal. To that end, in this submission we have carefully addressed the four questions posed by the Ministry and have summarized the valuable points that emerged from the Forum discussion, as well as the feedback received from participants.

1. What are the benefits of forest/nature programs?

- Research indicates that spending time outside provides significant benefits to overall well-being, including physical, spiritual, mental, social and environmental health. *The Position Statement on Active Outdoor Play*, released in 2015 and based on 2 systemic reviews of scientific evidence states that “access to active play in nature and outdoors is essential for healthy child development, (and) recommend(s) increasing children’s opportunities for self-directed play outdoors in all settings—at home, at school, in childcare, the community and nature.”
- The foundational principles outlined in *How Does Learning Happen?* (Ontario’s pedagogy for the early years) and those of the FNS approach are very similar. Aligning these principles would expand existing learning opportunities for children: to connect with the natural world; to engage all of their senses while learning on the land; to be active and engaged in natural spaces in their own communities. It also nurtures authentic collaboration and connection between children, their families and educators, with the health benefits of children spending time outdoors being passed on to the adults in their lives.
- FNS programs are grounded in pedagogy while also offering regular and repeated access to the same wild space, allowing children to get to know the space through the seasons, fostering a sense of connection and lifelong environmental stewardship.

- Inquiry-based learning tends to emerge more authentically and naturally on the land than it does indoors.
- Authentic risky play scenarios emerge readily in the FNS approach, and co-navigating these scenarios fosters resilience and thoughtful decision making in children, another principle in *How Does Learning Happen*.
- Play and work on the land connects us to the truth that Indigenous People have been living and playing on this land for millennia. It reminds us to acknowledge the importance of Truth and Reconciliation, to acknowledge the traditional territories where we work and play and the nations that have and still do call this land home. We are reminded to take steps to connect with and build long-term relationships with Indigenous elders, advisors and community partners, and to take tangible steps toward being allies.
- Children’s development is nurtured through child-centered, interest-led, open-ended play opportunities on the land.
- A forest school-inspired program supports children’s mental health by supporting their self-expression, self-esteem, sense of belonging and by offering choice which allows for multiple entry points into the play so everyone can find a way to be inspired and engaged.
- These programs also support physical strength, ability, and resilience by being out in all weather and temperature, walking and running on uneven terrain, climbing and swinging and jumping, lifting and moving heavy objects.
- Educators and children are provided with an appreciation for nature and their natural curiosity is encouraged.
- Enabling legislation to license FNS programs would broaden accessibility and therefore be available to more families due to the provision of subsidy allocation.
- FNS programs provide equitable opportunities for all children to rise to new challenges, take risks, problem-solve, use their imaginations and to develop their thinking skills through collaboration. There are so many physical, social, interpersonal development benefits as children play together in natural spaces. There is no indoor environment quite as rich and filled with opportunity for learning as a forest or a field or creek. It is also the ideal environment to support the belief embedded in How Does Learning Happen that children are curious, capable and competent.
- Benefits of FNS programs include reduced stress, increased capacity for learning, improved motor skill development, improved social skill development, and increased capacity to retain knowledge due to the multi-sensorial context in which it was acquired.
- The benefits of FNS programs have become especially apparent during the COVID-19 pandemic. Children and families have returned to more grassroots values as the ensuing closures limited many of their chosen day-to-day activities.
- It is inspiring to see that families and regulatory officials are now beginning to see outdoor programming as a valid and necessary component of education, particularly in the early years.
- The exposure to risky play opportunities and the resilience that such free play can offer children is very needed in a time when mental health is becoming an increasingly more recognized and urgent issue among our young children.
- Removing walls and going outdoors removes many barriers to learning that exist for children.
- There is a multitude of learning styles and needs that can be met by the differentiated framework that outdoor learning programs can offer. Children in FNS programs experience time,

space, connection, play and joy on the land. There's an emphasis on trust and relationships, with themselves, each other and the land.

- A change to the environment can shift children's behavior and being on the land helps children with ADHD and other challenges to learn.

2. What could the licensing scheme for a forest/nature childcare program look like?

- Offering FNS programs the option of being licensed could broaden and promote equitable access to this opportunity for all children.
- Offering forest and outdoor play programs the option of being licensed would help legitimize, popularize, and promote this healthy child development opportunity.
- It could pull together various organizations who are currently doing this work (from urban settings, remote areas, and Indigenous organizations) and those who have created resources for supporting children on the land, to identify indicators of quality FNS programs.
- It could model a pilot licensed program in a variety of settings with programs downtown, in suburbs and in rural settings similar to the Washington model or the Newfoundland Cloudberry program.
- A licensing scheme for programs with less (or no) brick and mortar space should align with current quality practices of bringing people outside while ensuring the health and safety of all programs operating at a provincial level.
- The requirement to staff at full ratios at the beginning and end of the day provides limitations for outdoor programming and should be reviewed while looking at budget and exemptions to mitigate the risk.
- In an FNS context, the current competencies required for group management outside are entry-level and should be elevated to a qualified FNS Practitioner or Registered Early Childhood Educator for licensed programs.
- Certification training programs to acquire such competencies already exist. Beyond certification training, there are other ways to confirm competency. A licensing scheme should include mechanisms that recognize prior knowledge acquired through means other than certification training.
- Consult with experienced FNS and outdoor learning educators to define mechanisms that confirm such competencies and ensure the implementation of safe and relevant practices for licensed outdoor childcare programs. Review regulations to ensure health and safety measures, emergency procedures and evacuation plans, and responsible benefit-risk assessment procedures.
- Traditional fenced outdoor play areas can provide unnecessary limitations and barriers.
- Remove the requirement of a physical fence as this would allow access to nearby nature, green space, gardens and parks in the community. Educators are experienced and capable of teaching boundaries, children are capable of learning the boundaries and would benefit from play opportunities beyond the fence, in the community.
- Implementing program designs to overcome regulatory barriers needs to be more flexible such as allowing more time outside, not having to follow routines and reducing the number of transitions.

- Envisioning children being allowed to sleep or rest outside; eating outdoors, allowing children to truly regulate when they are hungry rather than eating at a set time; using sanitizer as an acceptable alternative to soap and water when needed.

3. How would a specialized licensing scheme for forest/nature childcare programs under the CCEYA support licensees/prospective licensees, children, and parents?

- A well-designed licensing scheme can increase safety and program quality for children and staff, it will improve recognition of competency for professionals, it will provide access to effective professional development, increase program resilience, reassure parents that their child is in the hands of a competent professional, foster workforce mobility, facilitate funding and increase the pool of available childcare workers.
- Being a licensed program would provide an opportunity for families and children to access more opportunities for real connection with nature supported by Registered Early Child Care Educators and FNS Practitioners. This contributes to lifelong environmental stewardship and healthy habits.
- Affordable fees for families would allow broader access for all children and thus be more inclusive.
- Settling for a mediocre designed licensing scheme will increase barriers to access for professionals, increase inequity, and reduce the offering of FNS programs.
- It can be more comfortable for children and families to communicate in a natural setting.
- It is easy to bring kids of all ages outside and offer experiences providing significant developmental benefits.
- It is believed that implementing these measures would allow Ontario to “catch-up” with the pedagogical implementation of outdoor learning programs already occurring in several western European countries and a few American states. It would also allow programs which have already been implemented in outdoor spaces to become licensed, accessing the network of social and professional supports available to licensed programs making the programs more accessible to families.
- The foundational skills that the caregiver must know are well established and have been successfully used for decades in all provinces with people of all ages in all seasons. Acquiring these foundational skills is easy and a community of expert organizations have been teaching them to youth caregivers for years. Any functional licensing scheme for FNS programs will save money and increase effectiveness by aligning with structures developed by experienced outdoor practitioners.
- It would give more options to offer diverse programs to meet children and family’s needs; allow opportunities to further learning expectations and outcomes; and increase building of capacity of staff.
- It would provide the needed regulations to support the safe delivery of programs, provide a framework for necessary qualifications, and standardize the outdoor learning sector. Changes to the policy framework within the Child Care and Early Years Act to include licensed outdoor play ECE programs in Ontario and for program advisor collaboration to support understanding outdoor play and learning would be transformative. A specialized licensing scheme for FNS childcare programs under CCEYA would support everyone involved as it would not only benefit the children and their overall health and learning, but those benefits would spill over onto staff and families as well (many European countries are experiencing these benefits).

- Licensing may empower and educate parents through the provision of tools to help them understand the importance of outdoor play and the outdoors more generally.
- To support licensing, create provisions for FNSs to become a possible curricular format for service provision by creating a new licensing category which uses the same standards as the CCEYA, but includes outdoor regulations which govern environmental safety, staffing ratios, and outdoor play space supervision in place of the indoor equivalents.
- Another possible solution would be to include these regulations inside of existing sections of the CCEYA, using the exemption-or-exception structure that is already used for mixed age groupings, and centres located within school properties in some sections of the Act.

4. Compared to centre-based childcare, what are the unique health and safety considerations related to the provision of forest/nature programs?

- Outdoor programming does admittedly present unique health and safety concerns (and benefits!), but these are not insurmountable challenges. The proper delivery of programming that includes anticipated risky play opportunities, tool use with children and elements such as fire and water can be done safely with adequate training, planning and experience, as well as the use of Risk-Benefit Assessments that help mitigate risk and the impact of environmental factors. First aid specific to outdoor programming is available and would be a necessary component, along with other required provisions. As an example: programs out on the land carry a more extensive First Aid kit including an EpiPen so educators can manage the safety of a child immediately in case they are stung and have an anaphylactic reaction. This is a unique consideration and educators cannot provide this care now in a licensed program. There is a continuum of FNS programs, each with unique considerations based on their location as well as other factors, and there are some consistent themes related to health and safety.
- FNS programs understand and hold space for different kinds of risky play such as climbing a tree, running along a log, sliding down the snow, building a slackline... a gradual release approach and risk benefit assessment helps minimize the risk, while supporting the personal value of these experiences – such as children’s self-awareness, their confidence and autonomy, and their communication skills. A system can and should be developed to embrace this type of programming, to support making the benefits available to children and families.
- The dynamic and open nature of being outdoors leads to the effective strategy of co-creating safety guidelines with children. The environment, the children, the weather all contribute to the creation of those guidelines. Flexibility in terms of ideas around boundaries and fencing is essential. Children can learn to self-regulate their space from their group and their educators.
- FNS programs have to trust their processes, such as co-navigating risk with children and risk-benefit assessments, they have to trust themselves, each other and their relationships with children when out on the land.
- Built into that process needs to be space for common sense. One Forum attendee stated that “A precedent for this could be found in many school board weather policies where Principals are not given a required response to certain temperatures but rather guided to make informed thoughtful decisions about extreme weather conditions”.

All of these conditions (the changeable outdoor environment, co-creation of boundaries, common sense and training/informed decisions) are considered through the risk mitigation process of risk-benefit assessments (RBAs). Most sites use seasonal site RBA,

activity/experience RBA, and dynamic RBAs. (Risk-Benefit Assessment for Outdoor Play: A Canadian Toolkit)

- Policies for evacuation and emergency procedures are unique to these environments but can be aligned with current policies and procedures. Additionally, consideration is required to implement reasonable health and safety measures for sanitary conditions, drinking water and washrooms, accessibility, and fire. Flexibility in terms of what kind of shelters are possible/permitted is needed – some FNS programs use cabins, wall tents and yurts with wood stoves for heat. Some do not have running water but rather bring their water in each day.
- Most FNS programs choose to mix age groupings to support the development of relationships, empathy and scaffolding learning from peers.
- Supporting risky play and children’s programs on the land requires emergent responsive planning - Educators are thinking on their feet, planning and adjusting according to the conditions outdoors so they need ongoing professional training, time for reflection and debriefing in their schedules, and to revisit their RBAs regularly.
- FNS programs happen in an ever-evolving context. Staff must have the foundational competencies to maintain situational awareness and implement effective group management techniques to adapt to the situation. Considering most training programs do not teach these competencies to childcare professionals, there is a need to support competency development in RBA.
- Less equipment and more program planning experience or training would be required for staff to plan with minimal physical equipment and learn to trust that learning will emerge in a natural setting.
- The unique benefits of a program on the land provides all involved with a great opportunity to understand the environment while implementing proper safety measures. Children connect better to the outdoors and very quickly learn their limitations while testing their skill level. It can only benefit those involved especially those children with behavior issues as this will provide them with the opportunity to be outside of a classroom without feeling confined and limited in their ability to challenge their own learning.

Conclusion

Participants at the Provincial Forum were invited to share their opinion of whether FNS programs should be licensed. The vast majority (more than 90%) were in favor while also valuing (in descending order) the following factors as part of the framework: **provincial standards, accreditation, educator certification, pilot projects** and **ongoing professional learning**.

We are pleased to have been given this opportunity to provide feedback and will continue to engage with the Government as this process moves forward. We are deeply committed to supporting the growth of quality forest and outdoor play programs as they are beneficial to all children and families of Ontario. The Child Care Licensing Act and Child Care Licensing Regulation play an important role in enabling programs to support the reality of more FNS and outdoor programs. Now is the time for Ontario to help lead the nation in listening to the evidence as well as the advice of public health authorities regarding the importance of supporting getting the learning outside - both from a physical and emotional health and safety perspective. Educators working in licensed programs are looking for ways to offer more programming outside. Children and families know and feel the value that spending more time playing on the land offers, and they are yearning for these opportunities.

References and Resources

What are Forest and Nature Schools? Child and Nature Alliance of Canada, 2019

<https://childnature.ca/about-forest-and-nature-school/>How Does Learning Happen?

<https://www.edu.gov.on.ca/childcare/howlearninghappens.pdf>

OCDSB Extreme Weather Conditions- School Protocol

<https://weblink.ocdsb.ca/WebLink/ElectronicFile.aspx?docid=2008841&dbid=0&repo=OCDSB>

Ontario Ministry of Health, "COVID-19 Guidance: Emergency Child Care Centres," May 8, 2020, accessed June 2, 2020, <http://www.edu.gov.on.ca/childcare/child-care-re-opening-operational-guidance.pdf>.

ParticipACTION Report Card 2020 https://participaction.cdn.prismic.io/participaction/f6788b5a-e815-4ffa-bb17-70cab50e1b13_2020-Child-and-Youth-Report-Card-ENG-Fact-Sheet.pdf

Position Statement on Active Outdoor Play

https://participaction.cdn.prismic.io/participaction%2F45e84385-dc07-48a3-af13-3cd43a44a9eb_participaction-2015-report-card-highlight.pdf

Risk Benefit Assessment Toolkit <https://adobeindd.com/view/publications/54ad27be-bf53-4810-adc1-1c9505c12e4a/9rb1/publication-web-resources/pdf/2019-11-03-CANADA-RBAT-ENGLISH.pdf>

Should I go outside in the COVID-19 era?

<https://www.outdoorplaycanada.ca/should-i-go-outside-in-the-covid-19-era>

Washington State: Department of Children, Youth and Families. (2019). Outdoor, nature-based early learning and child care project. <https://files.eric.ed.gov/fulltext/ED601955.pdf>

Endorsement

This submission was prepared by one of the Directors of Andrew Fleck Children's Services in consultation with the senior leadership of Dr Mark Tremblay, Director of Halo, Children's Hospital of Eastern Ontario Research Institute (CHEO), Louise deLannoy PhD Research Coordinator, Healthy Active Living and Obesity Research Group, CHEO, Heather Wilson-Forbes, Executive Director of The Child and Nature Alliance of Canada and Kim Hiscott Executive Director of Andrew Fleck Children's Services.

We are pleased to have received endorsement from the following individuals, agencies and organizations and have been given permission to include their name.

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