



Community Service Organization and Facility Allocation Policy Review Project

→ Final Report

Updated: June 3rd, 2022



Table of Contents

Executive Summary	1
Project Overview	1
Current State Findings – Areas of Strength	1
Current State Findings – Opportunities for Improvement	2
Jurisdictional Scan Findings	3
Overview of Recommendations.....	4
Implementation and Change Management Considerations	4
 1.0 Project Context and Overview	 5
1.1 Purpose of this Document	5
1.2 Project Mission	5
1.3 Project Approach and Timelines	5
 2.0 Current State Findings	 6
2.1 Current State Review Methodology.....	6
2.2 Areas of Strength	7
2.3 Opportunities for Improvement	8
2.3.1 Findings – Equity, Diversity, and Inclusion.....	8
2.3.2 Findings – Permitted Non-Use	9
2.3.3 Findings – Enforcement	9
2.3.4 Findings – CSO Classification and Facility Allocation Priority	10
2.3.5 Findings – CSO Eligibility for Subsidized Rates.....	11
2.3.6 Findings – Other.....	12
 3.0 Jurisdictional Scan Findings.....	 13
 4.0 Recommendations	 14
4.1 Overview of Recommendations.....	14
4.2 Detailed Recommendations.....	14
4.2.1 Recommendation CSO 1	14
4.2.2 Recommendation CSO 2	17
4.2.3 Recommendation CSO 3	18
4.2.4 Recommendation CSO 4	20
4.2.5 Recommendation CSO 5	21
4.2.6 Recommendation CSO 6	22
4.2.7 Recommendation FA 1	24
4.2.8 Recommendation FA 2.....	26
4.3 Supporting Recommendations.....	28
 5.0 Implementation and Change Management	 28
5.1 Proposed Sequence of Recommendation Implementation	28
5.2 Implementation and Change Management Considerations	29

Executive Summary

Project Overview

Optimus SBR supported the City of Vaughan to conduct a comprehensive review of the current Community Service Organization (CSO) and Facilities Allocation (FA) policies. The objective of this engagement was to identify recommendations that reflect the changing recreation and facility needs of the municipality in an equitable manner.

This process resulted in the development of sustainable recommendations and a direction to position the City to respond to the changing recreation and facility needs of its user or community groups and citizens, as well as the creation of revised policies to promote equity deserving groups. The updated policies will confidently support clear decision-making, were developed based on leading practices, and will improve operations within Vaughan.

Current State Findings – Areas of Strength

Based on our interviews and focus groups, as well as our data and document review, we have consolidated our findings. High-level areas of strength are categorized by the following three themes:

Table 1: Key Areas of Strength from Current State Findings

Theme	Description
City Staff Support	Stakeholders repeatedly commented that the support received from the City's Recreation department is helpful, and the responsiveness of staff was noted as a particular strength.
Application and Requalification Process	A sizeable majority of stakeholders noted that the application and requalification process is clearly articulated in the policies and is easy to follow. However, there may be an opportunity to simplify and streamline the process for existing CSOs.
Prioritization Direction	Most stakeholders agreed that the City's focus on prioritizing youth and seniors groups is appropriate and should be maintained. However, some stakeholders noted that young adults (those aged 19-32) should be considered as a focus going forward, although this change would be difficult to implement given current facility capacity constraints and impacts this change might have on existing prioritized groups.

Current State Findings – Opportunities for Improvement

Based on our engagement of stakeholders, as well as our data and document review, we have consolidated our findings. High-level areas of improvement are categorized by the following five themes:

Table 2: Key Opportunities for Improvement from Current State Findings

Theme	Description
Equity, Diversity, and Inclusion	While there has been organic growth in the programs and initiatives offered to improve diversity among CSOs, the CSO and FA policies should be updated to align to the City's overarching DEI Strategy and principles.
Permitted Non-Use	Permitted non-use was noted as an issue that is particularly prevalent for outdoor sports and facilities, and affects smaller CSOs with less perceived authority over preferred times.
Enforcement	The City's policies clearly articulate the potential ramifications of permitted non-use and other policy violations, however, additional measures or processes could be added to improve adherence to the stated policies.
CSO Classification and Facility Allocation Priority	While there are no major concerns regarding the current classifications that are used, stakeholders noted areas where improvements could be made to requalification and permitting processes.
CSO Eligibility for Subsidized Rates	A wide range of stakeholders expressed concern that some CSOs may be hosting events or providing services for non-charitable or non-profit purposes, while still receiving access to subsidized rates and benefits.
Other	While not directly aligned with any one area listed above, additional themes were identified that could support future implementation or process changes in the future.

Jurisdictional Scan Findings

To identify leading practices employed by comparable municipalities, a Jurisdictional Scan was conducted. Scanning activities focused on comparing and contrasting policies and operational procedures with the City's current policies and practices, and identifying best practice approaches that could be applied to the City's CSO and FA Policies.

The table below provides a high-level summary of relevant findings from the Jurisdictional Scan that may impact future operations of the City.

Table 3: Overview of Jurisdictional Scan Findings

Municipality	Overview of Key Findings
City of Mississauga	<ul style="list-style-type: none"> Introduced "emerging group status" for groups that do not yet meet all CSO eligibility criteria Produced multiple facility policies to differentiate specific activity requirements, including emerging sports requirements
City of Brampton	<ul style="list-style-type: none"> Seek to promote "mechanisms" for enhancing Diversity, Equity, and Inclusion principles within affiliated groups in their updated policies Use in-house data analytics team, as opposed to application data, to better understand field and facility usage in making its facility allocation decisions
City of Markham	<ul style="list-style-type: none"> Field audits by City staff are successfully conducted on a random basis, which help to avoid issues of permitted non-use and non-permitted use Previously focused on tennis and cricket policies, and plan on focusing on pickleball moving forward
City of Richmond Hill	<ul style="list-style-type: none"> Provide exemptions for residency requirement for groups providing new/emerging services, serving population with special needs, etc. Recognize the importance of protected facilities for emerging sports/growing population
Town of Milton	<ul style="list-style-type: none"> For its next review, the Town is leaning towards using the 'Sport for Life' long-term model to tie allocation into standards of play, aligning with community benefits Developed reciprocal agreements with school boards to maximize facility use
Town of Oakville	<ul style="list-style-type: none"> For "social service organizations", residency requirements differ from usual 75% Oakville resident requirement. Developed a public-facing Indoor & Outdoor Facility Booking Guide to reduce the need for staff engagement or intervention

Overview of Recommendations

Based on the findings from the Current State Review, supplemented by the key findings and leading practices identified from the Jurisdictional Scan, a set of recommendations for updating both the CSO and FA Policies have been developed. These recommendations are outlined in the table below, which are expanded upon in greater detail in Section 4.2 (Detailed Recommendations).

Table 4: Overview of Policy Recommendations

Policy	Recommendation
CSO 1	Introduce an “emerging group” status
CSO 2	Formally implement bi-annual requalifications for established CSO groups
CSO 3	Deploy an <i>online</i> portal for groups to submit their applications and requalification requirements
CSO 4	Include a DEI statement that aligns to the City’s overarching DEI Strategy, which CSOs must agree to align or adhere to
CSO 5	Place additional financial controls on CSO eligibility for rate subsidies
CSO 6	Include a ‘Frequently Asked Questions’ section in the CSO Policy or Website
FA 1	Review and refresh the enforcement policies and procedures
FA 2	Include a ‘Frequently Asked Questions’ section in the FA Policy or Website

Implementation and Change Management Considerations

Figure 1: Proposed Implementation Schedule Figure 4 below is designed to provide the City with a clear sequence by which the recommendations developed can be implemented. As the City will begin implementing its changes when it feels it is appropriate and effective, the Optimus SBR team has left timelines at the quarter level. Whenever implementation is expected to begin is when “Q1” can be started.

It is expected that the City will need to complete a number of activities prior to beginning implementation of the policies in “Q1”, such as communicating changes with existing CSO groups and stakeholders, and determining funding requirements for items such as implementing signage or developing online portals. For a full listing of change management and implementation considerations, see Section 5.2 in the body of this Final Report.

Figure 1: Proposed Implementation Schedule

Recommendation	Q1	Q2	Q3	Q4	Q5
CSO 2: Formally implement bi-annual reporting for established CSO groups	■				
CSO : Place additional financial controls on CSO eligibility for rate subsidies	■	■	■		
CSO 5: Include a ‘Frequently Asked Questions’ section in the CSO Policy		■	■		
FA 2: Include a ‘Frequently Asked Questions’ section in the FA Policy		■	■		
CSO 4: Include a DEI statement that aligns to the City’s overarching DEI strategy			■	■	
CSO 3: Deploy an <i>online</i> portal for groups to submit their applications and reporting requirements			■	■	■
FA 1: Review and refresh enforcement policies and procedures			■	■	■
CSO 1: Introduce an ‘emerging group’ status			■	■	■

1.0 Project Context and Overview

Optimus SBR supported the City of Vaughan to conduct a comprehensive review of the current Community Service Organization (CSO) and Facilities Allocation (FA) policies. The objective of this engagement was to identify recommendations that reflect the changing recreation and facility needs of the municipality in an equitable manner.

This process resulted in the development of sustainable recommendations and a direction to position the City to respond to the changing recreation and facility needs of its user or community groups and citizens, as well as the creation of revised policies to promote equity seeking groups and visible minorities. The updated policies will confidently support clear decision-making, were developed based on leading practices, and will improve operations within Vaughan.

1.1 Purpose of this Document

The purpose of this document is to consolidate findings from throughout the project, to provide resultant recommendations, and to support the City as it implements these in the future through a practical and realistic path forward. This report will be presented to the City's Council in May 2022. The Final Report includes:

- o An Executive Summary;
- o Project Context, Mission, Success, and Approach;
- o Key findings from the Current State Review;
- o Key learnings from reviewing select jurisdictional comparators;
- o Recommendations for updating both the CSO and FA Policy; and,
- o Implementation and Change Management considerations.

1.2 Project Mission

The Project Mission was defined at the outset of the project, jointly between Optimus SBR and the City. It is designed to outline the core goal of the project. For this engagement, the Project Mission is defined as follows:

- o To conduct a comprehensive review of the current Community Service Organization (CSO) and Facilities Allocation (FA) policies of the City of Vaughan to identify recommendations that reflect the changing recreation and facility needs of the municipality in an equitable manner. The policies will be reviewed and approved in time for 2022 summer allocations.

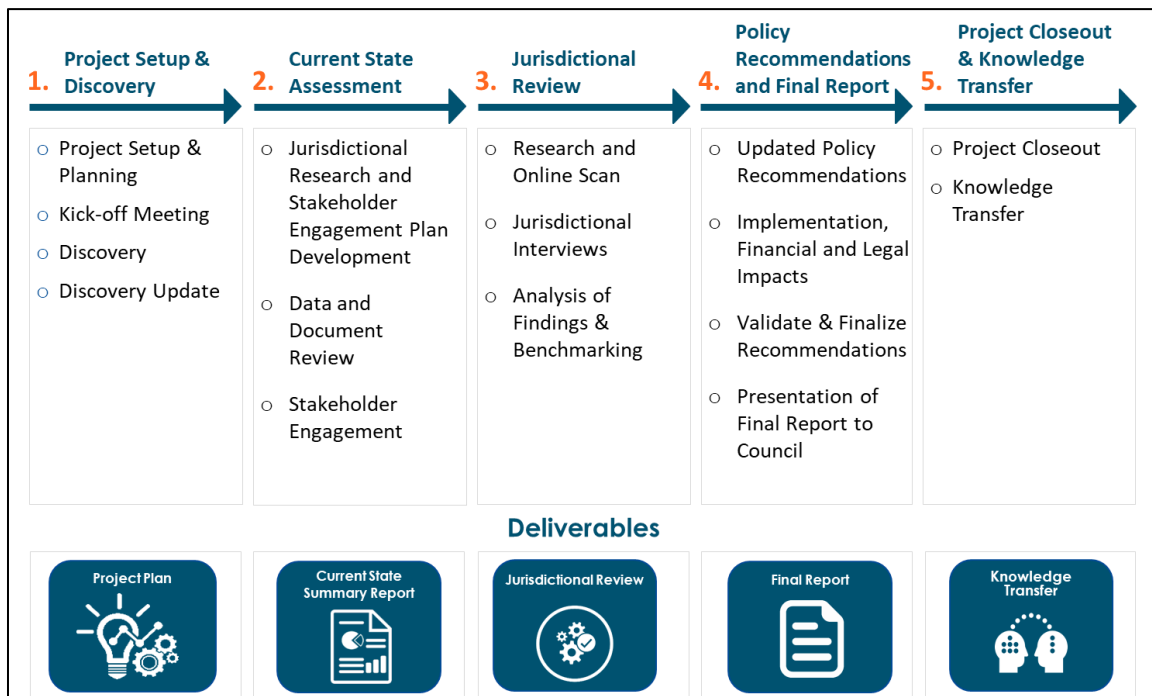
In addition to the Project Mission, the City and Optimus SBR have defined project success – the desired end goals of the project and work – as follows:

- o Refreshed CSO and FA policies that align with leading practices and the needs of Vaughan.
- o Clear direction forward to remain consistent with user policy fees and fiscal responsibility.
- o Engagement of key stakeholders to ensure that critical perspectives are considered and factor into future state policies.
- o Sustainable recommendations and direction to position the City to respond to the changing recreation and facility needs of its user or community groups and citizens, as well as creating policy to promote equity seeking groups and visible minorities.
- o Confidence and buy-in that the future state policies will support clear decision-making, will be based on leading practices, and will improve operations within Vaughan.

1.3 Project Approach and Timelines

We aimed to achieve the mission of this engagement by using the following approach.

Figure 2: Project Approach



2.0 Current State Findings

2.1 Current State Review Methodology

The following methodology was used to gather insights from the general public, Council, the Diversity Equity and Inclusion Task Force, community service organizations (CSOs), prospective CSOs, ratepayer groups, and other facility users:

Data and Document Review: Thoroughly reviewing data and documents, including:

- o CSO and FA Policy Brochures
- o CSO and FA Policy Manuals
- o CSO Annual requalification requirements
- o Registered Ratepayer Group and Community Association Policy and associated Reviews
- o Bookings per facility
- o Annual event lists
- o Recreation services organizational charts
- o City of Vaughan's Active Together Master Plan
- o 2016 Recreation Services User Fee Study Final Report

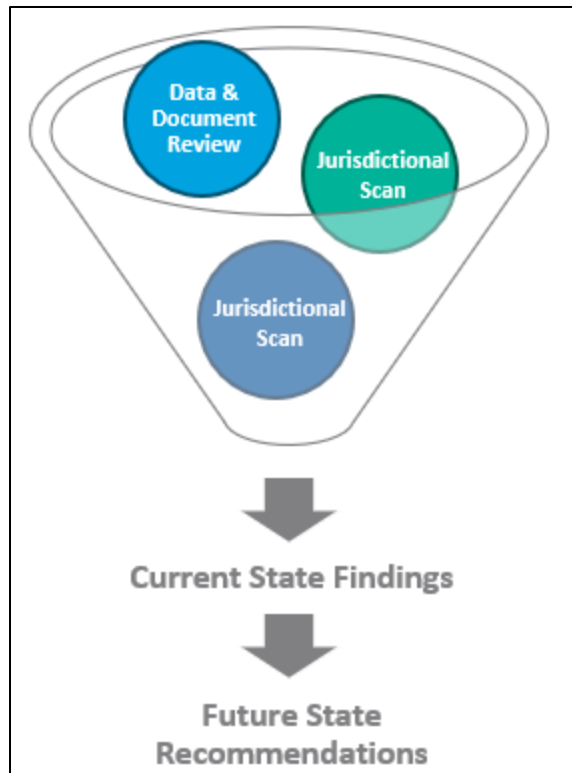
Stakeholder Engagement: Engaging with stakeholders through a variety of methods:

- o Individual interviews
- o Focus Groups
- o Public Survey (Online)
- o Public Drop-In Sessions
- o Engagement of the Diversity Equity and Inclusion Task Force

Jurisdictional Scan: Conducting research and interviews on the following comparator municipalities:

- o City of Richmond Hill
- o Town of Milton
- o City of Brampton
- o City of Mississauga
- o City of Markham

Figure 3: Key Elements of Current State Review Methodology



2.2 Areas of Strength

Based on our interviews and focus groups, as well as our data and document review, we have consolidated our findings. High-level areas of strength are categorized by the following three themes:

Table 5: Key Areas of Strength from Current State Findings

Theme	Description
City Staff Support	Stakeholders repeatedly commented that the support received from the City's Recreation department is helpful, and the responsiveness of staff was noted as a particular strength.
Application and Requalification Process	A sizeable majority of stakeholders noted that the application and requalification process is clearly articulated in the policies and is easy to follow. However, there may be an opportunity to simplify and streamline the process for existing CSOs.
Prioritization Direction	Most stakeholders agreed that the City's focus on prioritizing youth and seniors groups is appropriate and should be maintained. However, some stakeholders noted that young adults (those aged 19-32) should be considered

	as a focus going forward, although this change would be difficult to implement given current facility capacity constraints and impacts this change might have on existing prioritized groups.
--	---

2.3 Opportunities for Improvement

Based on our engagement of stakeholders, as well as our data and document review, we have consolidated our findings. High-level areas of improvement are categorized by the following five themes:

Table 6: Key Opportunities for Improvement from Current State Findings

Theme	Description
Equity, Diversity, and Inclusion	While there has been organic growth in the programs and initiatives offered to improve diversity among CSOs, the CSO and FA policies should be updated to align to the City's overarching DEI Strategy and principles.
Permitted Non-Use	Permitted non-use was noted as an issue that is particularly prevalent for outdoor sports and facilities, and affects smaller CSOs with less perceived authority over preferred times.
Enforcement	The City's policies clearly articulate the potential ramifications of permitted non-use and other policy violations, however, additional measures or processes could be added to improve adherence to the stated policies.
CSO Classification and Facility Allocation Priority	While there are no major concerns regarding the current classifications that are used, stakeholders noted areas where improvements could be made to requalification and permitting processes.
CSO Eligibility for Subsidized Rates	A wide range of stakeholders expressed concern that some CSOs may be hosting events or providing services for non-charitable or non-profit purposes, while still receiving access to subsidized rates and benefits.
Other	While not directly aligned with any one area listed above, additional themes were identified that could support future implementation or process changes in the future.

2.3.1 Findings – Equity, Diversity, and Inclusion

2.3.1.1 Detailed Findings

- Some CSOs are already taking the initiative to introduce DEI principles, initiatives, or activities within their own programming
 - In providing DEI programming, some CSOs feel that a subsidized rate for facilities should be offered in order to pass these savings onto DEI groups, and promote the growth of the sport or service.
- Some stakeholders expressed that the City should provide subsidized rates and/or additional benefits for groups that can't afford facilities or services due to historical inequity
 - Since rates are carried through to the end use in registration fees, certain disadvantaged groups may not be able to participate in sports or services where additionally subsidized rates are not provided.
 - While this was notion was expressed by stakeholders, it should be noted that the City would address this through its User Fee Policy review in the future.
- There is not only a need to provide equitable access to recreational facilities and programs for marginalized or under-represented communities, but also a need to ensure that they are treated fairly and are accommodated appropriately

- o In providing equitable access, the City should also endeavour to engage with groups to ensure that they are accommodated in a way that will create a positive atmosphere and continue to grow the sport or service.

2.3.1.2 Potential Implications

There was broad support from stakeholders for the inclusion of a statement encouraging CSOs to align with the City's broader DEI Strategy and principles. However, any mandates or requirements for these CSOs related to programming or internal policies would be best implemented in future years, and possibly in other policies.

2.3.2 Findings – Permitted Non-Use

2.3.2.1 Detailed Findings

1. CSOs noted that situations often arise where an organization is unable to use a facility for a valid reason, such as last-minute away games or tournaments, illness, and inclement weather
 - o Some CSOs expressed interest in allowing flexibility for unexpected, and emergency situations in the policies, or at least providing a formal response mechanism that can be used to provide an explanation (i.e., email, fillable forms, etc.).
2. For ice rinks, "black ice" is not considered to be a major issue
 - o The presence of City staff at these facilities, coupled with the high cost of booking these facilities, ensures that permitted non-use does not regularly occur.
 - o Additionally, groups using ice rinks appear to be fairly well-coordinated by sharing key dates and items amongst themselves.
3. For baseball and slo-pitch fields, smaller organizations feel that larger organizations are booking the fields, often without using them
 - o There was a stakeholder perception that this might be done intentionally to impede the growth of smaller organizations and/or prospective new CSOs.
4. Some stakeholders feel that the City lacks appropriate enforcement mechanisms for dealing with permitted non-use
 - o Some CSOs and prospective CSOs have expressed interest in instituting a progressive and more aggressive "strikes" rule for excessive non-use by permitted CSOs.

2.3.2.2 Potential Implications

Permitted non-use continues to be an issue that the City is aware of and is interested in attempting to rectify. An ongoing challenge is that it is likely not feasible for the City to increase its internal enforcement efforts or staff with respect to permitted non-use. However, there may be opportunities to improve compliance with the policies by instituting enhanced reporting or follow-up mechanisms, by creating more clearly defined progressive penalties for permitted non-use, and/or by instilling a community-centric enforcement approach.

2.3.3 Findings – Enforcement

2.3.3.1 Detailed Findings

1. CSOs that use fields/diamonds/buildings are particularly interested in improving enforcement of permitted non-use of facilities

- o Facilities where City staff are present (e.g., swimming pools), or where the costs associated with facility use are high (e.g., ice rinks) are less affected by permitted non-use and non-permitted use.
- 2. With regards to permitted non-use, CSOs feel that punishing or fining these organizations and/or their volunteers would be detrimental
 - o Some CSOs (different from those addressed in Permitted Non-Use #4) see the need for some leeway to account for inclement weather bookings, illness, and unexpected travel for away games or tournaments.
 - o Some stakeholders have suggested some form of a “self-audit” for CSOs to report which scheduled facilities they did not end up using, which could help for determining future allocation needs. However, given current capacity and resourcing constraints for the Recreation department, it may not be feasible to reallocate these facilities or issue refunds. Additionally, given the various schedules across organizations, it would be operationally difficult to reallocate facilities in an ad-hoc manner. As such, a “self-audit” mechanism would only be used to streamline any follow-up processes with regards to reported or alleged permitted non-use.
 - It should be noted that any desires for reallocating facility permits or detailed allotment reviews would require additional staff/resources
- 3. CSOs have expressed the need for a visibly posted “emergency contact” for patrol/maintenance that requires immediate assistance/dispute resolution, possibly through signage being placed at facilities to note permitted times and the associated permit holders
 - o CSO groups have expressed concerns regarding disrespectful and potentially damaging behaviour from non-permitted field users (e.g., the public) who refuse to yield for permitted users, and have noted that these issues are not resolved in time for them to continue with their permitted activities.

2.3.3.2 Potential Implications

The City’s policies clearly articulate the potential ramifications of permitted non-use, however, additional measures may be needed, such as the incorporation of a public or CSO reporting procedure, and outlining the possible consequences for non-permitted use.

2.3.4 Findings – CSO Classification and Facility Allocation Priority

2.3.4.1 Detailed Findings

- 1. Current classifications for CSOs appear to be appropriate and representative of the different CSO types
 - o Stakeholders did not voice any concerns regarding inappropriate classifications.
 - o Current CSO classifications (in order of priority) include:
 - Minor Children and Youth CSO Groups
 - Heritage Village Fairs
 - Seniors Groups
 - Social Service Organizations
 - CSO Groups (Schools, Religious Organizations, Ratepayer Groups, and other organizations)
 - Adult CSO Groups

However, it should be noted that there is a lack of clear definitions for each of these classifications in the Policy.

2. Some stakeholders are concerned that certain organizations classified as CSOs that generate large amounts of revenue from hosting events and services. There is a perception that these groups may be taking advantage of City staff/resources/facilities in an inappropriate manner, at a cost to the City and residents.
 - o Some stakeholders voiced concerns that these organizations are wrongly benefitting from subsidized rates and services in kind provided by the City to generate large amounts of revenue (possibly for profit), and as such they should pay a higher rate and/or not be classified as a CSO.
 - o It should be noted that the Recreation Department does require all CSOs to maintain a not-for-profit status with the Canada Revenue Agency, and to demonstrate this as part of the qualification/requalification process.
3. Smaller CSOs and some stakeholders believe that Grandfathering of booking allocations should be abolished
 - o There is a perception among some stakeholders the slate should be wiped clean each year to make booking allocations more equitable.
4. Some CSOs have suggested “progressive” scheduling of particular facilities, and that facility blocks be shortened to smaller time increments, however, these may not be operationally feasible for the City
 - o Some CSOs feel setting schedules at one point prior to the year/season is insufficient, and in many cases, may not align to when game and practice schedules are set for certain sports. However, it may not be operationally feasible for the City’s Recreation department to adjust schedules multiple times in the year, due to resourcing and capacity constraints. Additionally, it may not be operationally feasible to accommodate the changing schedules for various CSO groups.
 - o Stakeholders believe that blocks of time allocations could be split to make more efficient and fair use of facilities.

2.3.4.2 Potential Implications

Rather than altering the classification system for CSOs, stakeholders may prefer small improvements to the requalification and permitting processes that could reduce effort and improve lead times for events.

2.3.5 Findings – CSO Eligibility for Subsidized Rates

2.3.5.1 Detailed Findings

1. The review of the current CSO Policy found a belief that some CSO groups may be abusing their CSO status to receive access to subsidized rates and benefits. A common example provided was the situation of a CSO hosting large-scale events that are primarily intended to generate revenue.
 - o In many circumstances, this revenue is for charitable causes; however, for some organizations, only a minimal amount of funding is directed towards a charitable cause, while the organization takes advantage of its CSO status to have an extremely low overhead cost event, at the expense of the Vaughan tax base.

2.3.5.2 Potential Implications

Fundamentally, stakeholders are concerned that taxpayer subsidies may end up contributing to a large amount to an organization’s revenues or profits, where that organization could have afforded to pay a higher rate for the City’s services/facilities.

2.3.6 Findings – Other

2.3.6.1 Detailed Findings

1. Although stakeholders are overall satisfied with the application and requalification processes, there is some desire to create a digital portal for transparency, or changing the process of how data is provided to the City.
 - o Stakeholders noted that the process and requirements are easy to follow, information is clearly available, the City is responsive to application inquiries, and that there are no major concerns with the frequency of the application process.
 - o There may be an opportunity to make the CSO application/re-application and permitting processes less paper-based, and to use pre-saved data from years prior to reduce redundancy. Discussion related to capital requirements or procurement of a system is contained in section 5.2 (Implementation and Change Management Considerations) of this report.
2. There are mixed perspectives from stakeholders regarding whether groups applying for CSO status should be excluded if they offer a similar or duplicative service offered by an existing CSO.
 - o Existing CSOs have noted that the current policy excluding these groups helps to reduce risk for their own events and members, and ensures a level of continuity in the programming and services they are able to offer.
 - o Prospective CSOs have noted that the current policy excluding these groups limits their ability to grow and provide alternative service options for Vaughan residents.
 - Some prospective CSOs noted that the solution of partnering with existing CSOs is possible, however, these can feel as though they are the wrong fit and can reduce the ability of groups to maintain its own operations.
3. Stakeholders expressed a desire for more written guidance on the services-in-kind available, potential services or facilities that could be provided for special events and tournaments, and the process for obtaining these services.
 - o Stakeholders noted that they often communicate with the City on multiple occasions to secure the services they need, and that it may be more efficient to include more information in the written policies (be it the CSO or FA policies)
 - o However, it should be noted that the City posts its fees for facility rentals and services-in-kind annually online. There is also an opportunity to include the special event application form online.
4. Indoor facility users have noted that additional equipment or storage space may be required.
 - o Seniors' groups and cultural groups are adversely affected by the lack of additional equipment or storage space, particularly where equipment that is used is heavy or troublesome to move regularly (posing a potential safety risk).

2.3.6.2 Potential Implications

Rather than altering the classification system for CSOs, stakeholders may prefer small improvements to the requalification and permitting processes that could reduce effort and improve lead times for events.

There is an opportunity to provide additional detail regarding the services-in-kind that the City offers, as well as provide additional equipment or storage space to certain CSOs where there are potential safety concerns regarding moving equipment regularly. However, this may pose equity and fairness issues, as it would be challenging to determine which groups should receive storage space.

The City could choose to work with existing CSOs to develop a separate document or policy outlining the additional equipment and storage space requirements and procedures, as these specific situations would carry storage liability waivers and other requirements that the City may need to meet. It is expected that the development of a 'Storage Policy' would require input and involvement from the City's Facility Management department.

3.0 Jurisdictional Scan Findings

To identify leading practices employed by comparable municipalities, a Jurisdictional Scan was conducted. Scanning activities focused on comparing and contrasting policies and operational procedures with the City’s current policies and practices, and identifying best practice approaches that could be applied to the City’s CSO and FA Policies.

Prior to conducting the Jurisdictional Scan, over 10 potential comparator municipalities were identified with the City and reviewed. Organizations that were ultimately selected, in coordination with the City of Vaughan’s project team, for detailed scanning included:

- o The City of Mississauga;
- o The City of Brampton;
- o The City of Markham
- o The City of Richmond Hill;
- o The Town of Milton; and,
- o The Town of Oakville.

The table below provides a high-level summary of relevant findings from the Jurisdictional Scan that may impact future operations of the City.

Table 7: Jurisdictional Scan Key Findings

Municipality	Overview of Key Findings
City of Mississauga	<ul style="list-style-type: none"> Introduced “emerging group status” for groups that do not yet meet all CSO eligibility criteria Produced multiple facility policies to differentiate specific activity requirements, including emerging sports requirements
City of Brampton	<ul style="list-style-type: none"> Seek to promote “mechanisms” for enhancing Diversity, Equity, and Inclusion principles within affiliated groups in their updated policies Use in-house data analytics team, as opposed to application data, to better understand field and facility usage in making its facility allocation decisions
City of Markham	<ul style="list-style-type: none"> Field audits by City staff are successfully conducted on a random basis, which help to avoid issues of permitted non-use and non-permitted use Previously focused on tennis and cricket policies, and plan on focusing on pickleball moving forward
City of Richmond Hill	<ul style="list-style-type: none"> Provide exemptions for residency requirement for groups providing new/emerging services, serving population with special needs, etc. Recognize the importance of protected facilities for emerging sports/growing population
Town of Milton	<ul style="list-style-type: none"> For its next review, the Town is leaning towards using the ‘Sport for Life’ long-term model to tie allocation into standards of play, aligning with community benefits Developed reciprocal agreements with school boards to maximize facility use

Municipality	Overview of Key Findings
Town of Oakville	<ul style="list-style-type: none"> For “social service organizations”, residency requirements differ from usual 75% Oakville resident requirement. Developed a public-facing Indoor & Outdoor Facility Booking Guide to reduce the need for staff engagement or intervention

4.0 Recommendations

Based on the findings from the Current State Review, supplemented by the key findings and leading practices identified from the Jurisdictional Scan, a set of recommendations for updating both the CSO and FA Policies have been developed. These recommendations are outlined in the table below, which are expanded upon in greater detail in Section 4.2 (Detailed Recommendations).

4.1 Overview of Recommendations

Table 8: Overview of Policy Recommendations

Policy	Recommendation
CSO 1	Introduce an “emerging group” status
CSO 2	Formally implement bi-annual requalifications for established CSO groups
CSO 3	Deploy an <i>online</i> portal for groups to submit their applications and requalification requirements
CSO 4	Include a DEI statement that aligns to the City’s overarching DEI Strategy, which CSOs must agree to align or adhere to
CSO 5	Place additional financial controls on CSO eligibility for rate subsidies
CSO 6	Include a ‘Frequently Asked Questions’ section in the CSO Policy or Website
FA 1	Review and refresh the enforcement policies and procedures
FA 2	Include a ‘Frequently Asked Questions’ section in the FA Policy or Website

4.2 Detailed Recommendations

Detailed descriptions of each recommendation are provided in the following section. Each section contains:

- o An overview of the recommendation;
- o The supporting rationale for and expected benefits of the recommendation; and,
- o The details of how this recommendation is being incorporated within the updated CSO and FA Policies.

4.2.1 Recommendation CSO 1

4.2.1.1 Overview

Full Title: Introduce an “Emerging Group” status

This recommendation is intended to provide prospective CSO groups with a pathway to achieving full CSO status, while providing these groups with the appropriate benefits that would allow these groups to grow their service offering or membership.

While this status is intended to be conferred upon prospective CSOs, it is intended to only be used for CSO groups that *may* provide a similar or duplicate service to an existing one, but for which either demand or need is difficult to assess. For example, this status could be provided to prospective CSO groups that provide similar services to existing CSOs, but who seek to grow a service within a particular population or community.

To promote membership and service growth among Emerging Group CSOs, it is recommended that the City charge these groups the CSO rate, which would need to be included in the City's publicly-posted annual facility fee documents.

Examples of groups that may be eligible for Emerging Group status can include, but may not be limited to:

- A group that is providing a new sport or activity in Vaughan, but which does not meet the residency requirement for CSO status
- A newly formed group that does not yet possess a Board, but which has plans to do so
- A group that is providing a service to an underserved or equity-deserving community, but which does not meet all requirements to achieve full CSO status.

4.2.1.2 Rationale

During stakeholder engagement activities, stakeholders from prospective CSO groups and past unsuccessful applicants have noted that their groups have not been afforded the opportunity to access facilities and services that would allow them to grow their service or membership. Additionally, stakeholders from these groups feel that their groups are servicing a need not already provided by existing CSOs, but that they are not able to "prove" a need for their services due to a lack of facility access and/or City support. By providing these groups with some of the benefits and priority of full CSO status, these groups would be provided an opportunity by which they can seek to grow their operations and prove to the City that they are servicing a unique need in the community, to achieve full CSO status in the future.

4.2.1.3 Expected Benefits

By implementing an "Emerging Group" status, the City could expect to receive the following benefits:

- o If "emerging group" status CSOs are able to effectively grow their operations or membership, the City would be facilitating the delivery of a service that is addressing a community need not currently met by existing CSOs
- o The City would be provided with additional information by which it could determine whether there is a demand or a need for a prospective CSO's service, as well as be further justified in potentially denying CSO status to these groups in the future
- o Provide an opportunity to build relationships with new groups, and combat potential perceptions of bias towards known/existing CSOs

4.2.1.4 Policy Amendments

Related Policy and Section

As there is no current "Emerging Group" CSO status currently outlined in the CSO Policy, this section would require a net new section to be added to the Policy.

However, there would be minor additions to other sections of the policies that would be required to accommodate the new status, including:

- o CSO Policy Section 5: CSO Categories and Priority Schedule (primarily outlining where the Emerging Group would sit in the Priority Schedule)
- o CSO Policy Section 6: Application Requirements and Criteria

Additionally, upon future completion of the User Fee Policy Review, it is expected that the new “emerging group” status would need to be incorporated into the City’s fee structure.

Previous Policy Language

N/A

Proposed Language**Section 7: Emerging Group Status**

The City of Vaughan seeks to promote the development of new groups that provide unique services that meet an unmet need for Vaughan Residents. To support the development of these groups, the City may provide Emerging Group CSO status to groups that may not meet all of the eligibility criteria outlined in Section 6.

The City’s Recreation department staff will support the development of new groups, and will make a recommendation to the Manager, Recreation Services, who may approve a group for CSO status as an “Emerging Group”. This status would be conferred upon the group for a provisional period of 2 years, subject to an interim review after 1 year of achieving this status. Following this 2-year period, the group must be able to meet the requirements to achieve CSO status. If the group is not able to meet the requirements to achieve CSO status after a period of 2 years, the Emerging Group status will be revoked.

In order to be eligible as a Emerging Group CSO, the applying group must meet the following minimum eligibility criteria:

- o Consist of a minimum of 10 Members, and provide a full membership list (includes names, contact information, and addresses/proof of residency)
- o Provide their most recent financial statements, or a financial plan/proposed plan should the organization be relatively new (created within the previous year)
- o Be a not-for-profit incorporation

Failure to meet any of the above minimum eligibility criteria will result in an automatic rejection of the request.

In addition to the above minimum eligibility criteria, in order to be eligible as an Emerging Group CSO, the applying group should also meet the following criteria:

- o Provide a written statement of purpose
- o If applicable, provide a written justification for how their service is unique to any services offered by existing CSO groups
- o Possess an “interim” or “full time” board
- o Provide an actionable and realistic plan for growing their services and/or membership within the City of Vaughan

An application may be approved for Emerging Group status without the above listed items, at the discretion of the Manager, Recreation Services.

Groups approved for Emerging Group CSO Status will receive the same benefits as existing CSOs, as outlined in Section 3 (Benefits) of this Policy. Additionally, these groups will be included in the Facility Allocation Policy’s Priority Schedule (Section 4.0), being placed below Adult CSO groups, but above Residents, Commercial Groups, and Non-Residents in terms of priority.

Additional Changes Required

Upon review with the City of Vaughan project team, general definitions of each CSO category should also be included in the CSO Policy. Below are draft definitions that should be included in Section 5 of the CSO Policy (CSO Categories & Priority Schedule).

CSO Category	Description
Minor Children and Youth CSO Groups	<i>Groups that exclusively consist of members 18 year of age or under.</i>
Heritage Village Fairs	<i>Groups that organize events or services intended to foster community spirit or promote the heritage of Vaughan.</i>
Older Adults (Seniors Groups)	<i>Groups that exclusively consist of members 65 years of age or older.</i>
Social Service Organizations	<i>Non-profit groups that support or provide socially important services to residents of Vaughan.</i>
General	<i>Organizations providing cultural or charitable services or programs, or special interest groups.</i>
Schools	<i>Public and catholic schools, colleges, and universities (Note: these groups receive automatic approval, and do not include private schools)</i>
Ratepayers	<i>Organizations formed by a group of residents in a defined area that come together to address issues affecting its neighbourhood. (Note: These groups are governed by the City's Ratepayers Policy)</i>
Religious Groups	<i>Organizations that provide religious services or programs to Vaughan residents.</i>
Adult CSO Groups	<i>Groups consisting of members aged 19 to 64.</i>

4.2.2 Recommendation CSO 2

4.2.2.1 Overview

Full Title: Formally implement bi-annual (once every 2 years) requalification for established CSO groups

Currently, the CSO policies require CSO groups to submit their application requirements annually to the City of Vaughan. In practice, the Recreation department has generally requested CSOs to only provide updated information every two years, unless there has been a known major shift/change in the organization. However, the City does still reserve the right to request further details from groups within the two years period, as requested. This has been done to allow CSOs to focus on their operations and streamline the process of engaging with the City. This recommendation is therefore to update the policies to formally outline this reporting frequency.

4.2.2.2 Rationale

During stakeholder consultations, existing CSO groups noted that current reporting requirements are administratively burdensome. As most of these groups are run by volunteers, this can be particularly challenging for smaller or less established CSO groups, which may not possess the same resources and reporting capabilities as larger CSO groups. Additionally, as the Covid-19 pandemic has negatively affected membership for many CSO groups, stakeholders noted that this has exacerbated their volunteer shortages and negatively impacted their capacity to submit their application requirements for the current and upcoming years.

4.2.2.3 Expected Benefits

By formally implementing bi-annual (every 2 year) reporting for established CSO groups, the City can expect to receive the following benefits:

- o Alignment of the policies with common practice
- o Reduce the administrative burden of submitting application requirements for CSO groups
- o Continued streamlining of the process by which CSOs and others engage with the City, while still ensuring data fidelity and accuracy

4.2.2.4 Policy Amendments

Related Policy and Section

- o Section 6: Application Requirements and Eligibility Criteria

Previous Policy Language

CSO groups (excludes Ratepayers, Older Adults and Social Service Organizations) are required to file their application requirements annually with the City of Vaughan.

Proposed Language

CSO groups (excludes Ratepayers, Older Adults and Social Service Organizations) are required to file their application requirements bi-annually (every 2 years) with the City of Vaughan.

4.2.3 Recommendation CSO 3

4.2.3.1 Overview

Full Title: Deploy an *online* portal for groups to submit their applications and requalification requirements

Currently, application and reporting requirements are provided to the City in-person, or via email, fax, or mail. This recommendation would provide an alternative channel for CSOs and prospective CSOs to submit their application and reporting requirements through an online portal or submission form.

To implement this recommendation, the City would need to develop and implement an online portal or submission form. In particular, this portal or form would need to be developed so that it requests and collects all required application and reporting requirements, preferably with the ability to attach documents and spreadsheets. Additionally, the City would need to develop processes to ensure that submissions received through this portal or form are reviewed within the timeframes specified in the CSO Policy. It is expected that in the short-term, the City of Vaughan could seek to leverage its existing PerfectMind technology platform, whereas a long-term solution may require capital funding and additional resource commitments from multiple teams/departments to develop a more functional portal in the future.

In the future, it is recommended that the City could look to eliminate the existing submission methods and solely accept submissions through the online portal. However, this is not seen as being feasible to implement in the short-term. Additionally, it is recommended that the online portal be designed so that existing CSOs are set up with profiles that can easily auto-populate information from prior years' submissions.

4.2.3.2 Rationale

During the stakeholder engagement activities conducted, stakeholders from existing and prospective CSOs expressed a desire to implement an online portal for submitting applications to the City for qualification and requalification. In particular, stakeholders noted that information such as registration and residency

details, often tracked in information systems and spreadsheets, could be easier to provide via an online channel. Additionally, promoting the use of an online portal and submission of information in exported spreadsheets could provide the City with a greater or easier ability to manipulate and extract the data received for review and analysis purposes.

Through the Jurisdictional Scan, it was also identified that multiple municipalities have recently implemented online portals for receiving applications and reporting information, including the City of Mississauga, the City of Richmond Hill, the Town of Oakville, and the Town of Milton. Through discussions with stakeholders from these municipalities, many have reported success with implementing these portals, and have noted that they have achieved the intended effect of reducing administrative burden on community groups and their volunteers.

4.2.3.3 Expected Benefits

Through implementing an online portal or form to accept application and reporting requirements, the City could expect to receive the following benefits:

- o Reduced administrative burden for CSOs and their volunteers, particularly alleviating burden for smaller CSOs that may already have resource and capacity concerns,
- o Increased amount of data and information being provided in easily manipulatable formats such as spreadsheets
- o Alignment with broader “green” initiatives of the City, supporting a move to a reduction in paper/transition to paperless in the future

4.2.3.4 Policy Amendments

Related Policy and Section

- o Section 8: Process

Previous Policy Language

Process:

1. Interested groups must fill in and sign the application form ensuring that all information is submitted. Incomplete applications will not be processed. See section entitled Application Requirements.
2. Submit information to City of Vaughan, Dept of Recreation & Culture:
 - a. by e-mail: RecCSO@vaughan.ca
 - b. by mail or in person: City of Vaughan, Recreation Services, 3rd Floor 2141 Major Mackenzie Drive, Vaughan, Ontario L6A 1T1
3. Allow 6 to 8 weeks for processing.

Proposed Language

Process:

1. Interested groups must fill in and sign the application form ensuring that all information is submitted. Incomplete applications will not be processed. See section entitled Application Requirements.
2. Submit information to City of Vaughan, Dept of Recreation & Culture:
 - a. *Through the online portal found at the following link: [URL]*

- b. by e-mail: RecCSO@vaughan.ca
 - c. by mail or in person: City of Vaughan, Recreation Services, 3rd Floor 2141 Major Mackenzie Drive, Vaughan, Ontario L6A 1T1
3. Allow 6 to 8 weeks for processing

4.2.4 Recommendation CSO 4

4.2.4.1 Overview

Full Title: Include a DEI statement that aligns to the City's overarching DEI Strategy, which CSOs must agree to align or adhere to

4.2.4.2 Rationale

Through engaging stakeholders, including the City's DEI Task Force and Diversity and Inclusion Officer, it was determined that while many organizations are currently expanding service offerings and programs to marginalized or equity-deserving populations, there should be an additional focus on ensuring that services are equitable and that marginalized groups are provided accessible options.

Furthermore, there should be a show of alignment with the City's broader DEI Strategy and its approach to supporting an environment that is Diverse, Equitable, and Inclusive. As such, a statement within the CSO and FA Policies that directly refers to and demonstrates expected alignment with DEI requirements is suggested.

4.2.4.3 Expected Benefits

By encouraging CSOs to agree or adhere to a DEI statement that aligns to the City's overarching DEI Strategy, the City could expect to receive the following benefits:

- o Fostering an inclusive and diverse community within the City of Vaughan;
- o Clear and demonstrated alignment with the broader City direction on DEI requirements and activities
- o Improved accessibility to services and facilities for marginalized, underserved, or equity-deserving populations.

4.2.4.4 Policy Amendments

Related Policy and Section

This section does not currently exist in the policies today.

Previous Policy Language

There is currently no language related to this content today.

Proposed Language

The City recognizes and celebrates the human similarities and differences of people and communities who call the City home. The City is home to diverse communities whose significant contributions to the cultural, economic and social fabric make the City what it is today. Our commitment to diversity includes all groups protected by the *Ontario Human Rights Code*.

The City:

- o recognizes the unique status and diversity of First Nations, Métis and Inuit communities and their right to self-determination.
- o recognizes that advantages and barriers exist; therefore, therefore, we do not all start from the same place, nor do we have the same access to all opportunities.
- o recognizes that the impact of systemic, structural and institutional barriers must be addressed for Indigenous and equity-deserving groups to reach their fullest potential and achieve civic engagement.
- o recognizes that inclusion is an active, intentional and continuous process to address inequities in power and privilege
- o is committed to identifying and addressing barriers to reduce inequities and disparity, and ensuring that everyone has access to the same opportunities
- o is committed to addressing all forms of oppression, including racism, discrimination and bigotry.

All current or prospective CSO and their members and volunteers, must adhere to and abide by the values mentioned above. Any CSO groups whose actions and ideas run counter to the City's values may lose their CSO status.

All current or prospective CSOs must adopt diversity, equity and inclusion policies adhering to the same or similar principles outlined above.

4.2.5 Recommendation CSO 5

4.2.5.1 Overview

Full Title: Place additional financial controls on CSO eligibility for rate subsidies

4.2.5.2 Rationale

The review of the current CSO Policy found a belief that some CSO groups may be abusing their CSO status to receive access to subsidized rates and benefits. A common example provided was the situation of a CSO hosting large-scale events that are primarily intended to generate revenue.

In many circumstances, this revenue is for charitable causes; however, for some organizations, only a minimal amount of funding is directed towards a charitable cause, while the organization takes advantage of its CSO status to have an extremely low overhead cost event, at the expense of the Vaughan tax base.

By collecting additional information both before and after the event, and by providing itself the ability to request additional information and documentation, the City can perform the due diligence required to ensure that subsidized rates are only provided to organizations that align with the spirit of the Policy, and deserve or require the subsidized rate.

4.2.5.3 Expected Benefits

- By collecting this additional information, the City could expect to receive the following benefits:
- o Receive additional revenue from organizations using the subsidized rates for large-scale, revenue-generating events and services; and,
 - o Improve stakeholder perceptions regarding the potential misuse of taxpayer subsidies.

4.2.5.4 Policy Amendments

Related Policy and Section

This section does not currently exist in the policies today.

Previous Policy Language

There is currently no language related to this content today.

Proposed Language

The City reserves the right to request at any time a detailed business and communication plan, a list of revenue sources including grants and other forms of formal funding, the strategy to actively pursue fundraising activities or other sources of revenue, and a description of how any funds raised will be disbursed. The City reserves the right to deny a CSO eligibility for subsidized rates if it is not satisfied with how funds are raised and/or disbursed.

4.2.6 Recommendation CSO 6

4.2.6.1 Overview

Full Title: Include a ‘Frequently Asked Questions’ section in the CSO Policy or Website

4.2.6.2 Rationale

The review of the current CSO Policy found that while the current policy is comprehensive in terms of content, certain aspects/responsibilities of CSOs are found in different sections of the document. This may make the document difficult for stakeholders to read and fully understand their responsibilities and activities they are required to abide by. The Jurisdictional Scan found that other comparator municipalities, including Richmond Hill, have included ‘Frequently Asked Questions’ sections at the top of their policies, to quickly provide the most relevant information to stakeholders, without the reader having to sift through various sections of the Policy to gather the information.

4.2.6.3 Expected Benefits

By including a ‘Frequently Asked Questions’ section in the CSO Policy, the City can expect to receive the following benefits:

- o Improved communication with stakeholders; and,
- o Possible reduction in staff time required to support stakeholders in navigating the facility allocation process, or with simple questions that could be answered directly in the document.
- o Decreased CSO/stakeholder time navigating the policy, and an increased ability to effectively and efficiently abide by its requirements

4.2.6.4 Policy Amendments

Related Policy and Section

As there is no current ‘Frequently Asked Questions’ section currently included in the CSP Policy, this section could require a net new section to be added to the Policy. However, it is recommended that the City instead place this section on their publicly facing website, to avoid duplication in the policies and to allow the City to be able to continually update the section based on questions that are received.

It should be noted that the contents of this section are summarizations and amalgamations of information contained elsewhere in the CSO Policy. As such, it is prudent to ensure that the contents of this section ultimately align with any other updates made throughout the CSO Policy.

Previous Policy Language

N/A

Proposed Language

What kind of groups can be considered for CSO status?

- o The current categories of CSOs include:
 - o Adults
 - o Heritage Village Fairs
 - o General Groups (including cultural, charitable and special interest groups)
 - o Schools – Catholic, Public, college, and University
 - o Social Service Organizations
 - o Older Adults (governed by the Older Adult Club Policy)
 - o Ratepayers (governed by the Ratepayers Policy)
 - o Emerging CSO Groups

How is priority for facilities determined between CSO Groups?

- o Facility Rental Contracts are granted in a fair and equitable manner based on the priority schedule as defined in the Facility Allocation Policy, in accordance with the Council-Approved User Fee Policy rates.

What is the eligibility criteria to become a CSO?

- o In order to be eligible as a CSO, groups must:
 - have a membership open to all City of Vaughan residents that does not exclude participation on the ground of race, religion or political affiliation and abide by the Human Rights Code;
 - minimum of 75% residents except minor sports groups (aged 19 and under) must be comprised of 90% house-league residents;
 - be not for profit, volunteer based and run by an elected and volunteer board of directors; and,
 - demonstrate they exist for the exclusive benefit of Vaughan residents, and to enhance existing services.
- o Given that new groups have the potential of reducing the number of hours available to existing users, new user groups will only be considered in cases where a program provides a service to previously underserved segments of the population or where a new program is being introduced that is not available through existing organizations. When a new group is approved that requires facility time, the City will work with all users of the facility to pursue a change based on the principles of the FAP.
- o Groups applying for CSO status intending to offer a similar or duplicate service to an existing one will not be approved if the existing group is not in agreement and can meet the overall demand for the service.

What is the application process for applying for CSO status?

1. Interested groups must fill in and sign the application form ensuring that all information is submitted. Incomplete applications will not be processed. See section entitled Application Requirements.
2. Submit information to City of Vaughan, Dept of Recreation Services:
 - a. Through the online portal found at the following link: [URL]
 - b. by e-mail: RecCSO@vaughan.ca
 - c. by mail or in person: City of Vaughan, Recreation Services, 3rd Floor 2141 Major Mackenzie Drive, Vaughan, Ontario L6A 1T1

3. Allow 6 to 8 weeks for processing.

4.2.7 Recommendation FA 1

4.2.7.1 Overview

Full Title: Review and refresh the enforcement policies and procedures

This recommendation is intended to combat instances of permitted non-use, as well as some instances of non-permitted use. To combat these instances, there are 3 main components of this recommendation, from both an FA Policy and operational standpoint:

1. Implement a mechanism (online reporting form) for CSOs and Ratepayer groups to self-report when a permitted facility will be unused, for both planned absences (e.g., tournaments, away games, etc.) as well as immediate absences (e.g., sickness, inclement weather).
 - o Planned absences should be reported at least 2 weeks in advance of the date of absence.
 - o Immediate absences should be reported within 24 hours of the unplanned absence.
2. Refresh the FA Policy to outline increasing penalties for permitted non-use
 - o First instance of reported permitted non-use during a particular seasonal booking would result in a warning for the organization
 - o For each following instance of reported permitted non-use during a particular seasonal booking, the City would reserve the right to charge the CSO group the full resident rate for the facility
 - o If there are continued documented/reported instances of no shows during the same seasonal booking, the City could revoke the seasonal booking for that timeslot, and for the following year, that timeslot would be considered new inventory/availability.
3. Implement signage at each City facility that would provide an avenue for the public to determine when the facilities are regularly permitted for the season, to encourage community reporting of instances of permitted non-use and non-permitted use. Signage should include the details required to submit an instance of permitted non-use (i.e., time-stamped photographs, date/time of instance, etc.). This can be done through seasonally updating signage, which is capital and resource intensive and could be prone to error, or through signage that outline where the facility's schedule can be found online for review (it is thought that the City may be able to leverage its PerfectMind platform to display a facility's availability publicly online). The City's recreation department would need to coordinate with the Parks Department to produce and secure funding for the signage, and may require their continued involvement should it be determined that the signage will be updated annually.

4.2.7.2 Rationale

From engagement activities, stakeholders expressed mixed views on punishing CSOs and Ratepayer groups for instances of permitted non-use. Smaller CSOs and prospective CSOs generally expressed concern with the scale of permitted non-use at City facilities. They feel that larger organizations will book more timeslots than are needed to "block" competing CSOs, which can negatively impact their ability to grow. Conversely, larger CSOs were generally opposed to punishments, as sometimes there are instances where a permitted non-use is reasonable (e.g., away games, tournaments coaching sickness), and feel that punishing these organizations and their volunteers would be unreasonable.

From the City's perspective, it is operationally difficult and infeasible to monitor all of its facilities for instances of permitted non-use. Implementing seasonal signage is intended to support the City in monitoring its facilities, by allowing the community to report instances of both permitted non-use and non-permitted use. Additionally, the implementation of a mechanism for self-reporting is intended to support

the City in responding to community reports and facilitating the follow-up process to determine why a particular facility was unused.

By implementing a system of graduated and clearly defined penalties for permitted non-use, the City is able to achieve a “middle of the road” solution. To satisfy the larger CSOs, their volunteers are not penalized, but rather the organization is punished. To satisfy smaller CSOs, they are given a clear method by which they can report repeat offenders. The City benefits by having increased monitoring of its facilities, without increasing its by-law officer complement. Additionally, through the application of fines, the City collects additional revenues from bad actors, while providing an incentive to correct the actions of bad actors. During the Jurisdictional Scan interviews with comparator municipalities, many noted that increasing rates is the most prudent method to incentivize organizations to not book facilities they have no intention of using.

4.2.7.3 Expected Benefits

By refreshing the enforcement policies and procedures, the City can expect to receive the following benefits:

- o Decrease in the instances of permitted non-use and non-permitted use, thereby alleviating concerns from smaller CSOs and prospective CSOs of other user groups booking facilities in excess of their needs
- o Avoid unnecessary penalties for individuals/volunteers, while providing effective incentives to correct the activities of the organizations as a whole
- o Facilitate easier follow-ups on instances of permitted non-use for City staff
- o Increase revenue generation through charging the full regular facility rates for repeated instances of permitted non-use

4.2.7.4 Policy Amendments

Related Policy and Section

Only components 1 and 2 of this recommendation require direct updates to the FA Policy, while component 3 is an operational recommendation that is intended to support components 1 and 2.

Although the City clearly articulates its rights and authorizations in Section 6 (Authority of the City), it is recommended that a new section titled “Enforcement Procedures” be added to the FA Policy.

Previous Policy Language

N/A

Proposed Language

Section [#]: Enforcement Procedures

To facilitate compliance with this Facility Allocation Policy, the City has implemented the following policies and procedures:

- o In the event a group will not be utilizing a permitted facility (“no show”), and where this is known in advance, the permit holder is required to complete the form found at [URL] and submit this to the City at least 2 weeks in advance of the expected date of no show.
- o In the event a group is not able to utilize a permitted facility (“no show”), but where this is due to an extenuating immediate circumstance (i.e., sickness or inclement weather), the permit holder is required to complete the form found at [URL] and submit this to the City within 24 hours following the date of no show.

- o In the event a group is not utilizing the permitted facility (“no show”) for a particular seasonal booking, the Department of Recreation Services will follow the below schedule of increasing penalties:
 - Upon the first instance of a no show for a seasonal booking, a formal written alert will be sent to at least one Executive Member of the offending group
 - For each additional instance of a no show during the same seasonal booking, the City reserves the right to retroactively charge the offending group the regular “resident rate” for the use of the facility
 - If there are continued documented instances of no shows during the same seasonal booking, the City reserves the right to revoke the seasonal booking, and the particular seasonal booking would be considered as new inventory/availability for the next year’s allocation.

4.2.8 Recommendation FA 2

4.2.8.1 Overview

Full Title: Include a ‘Frequently Asked Questions’ section in the FA Policy or Website

4.2.8.2 Rationale

The review of the current FA Policy found that while the current policy is comprehensive in terms of content, the relevant information for stakeholders is found in different sections of the document. This may make the document difficult for stakeholders to read and gather the information they are looking for. The Jurisdictional Scan found that other comparator municipalities, including Richmond Hill, have included ‘Frequently Asked Questions’ sections at the top of their policies, to quickly provide the most relevant information to stakeholders, without the reader having to sift through various sections of the Policy to gather the information.

4.2.8.3 Expected Benefits

By including a ‘Frequently Asked Questions’ section in the FA Policy, the City can expect to receive the following benefits:

- o Improved communication with stakeholders; and,
- o Possible reduction in staff time required to support stakeholders in navigating the facility allocation process, or with simple questions that could be answered directly in the document.
- o Decreased CSO/stakeholder time navigating the policy, and increased ability to effectively and efficiently abide by its requirements

4.2.8.4 Policy Amendments

Related Policy and Section

As there is no current ‘Frequently Asked Questions’ section currently included in the FA Policy, this section would require a net new section to be added to the Policy. However, it is recommended that the City instead place this section on their publicly facing website, to avoid duplication in the policies and to allow the City to be able to continually update the section based on questions that are received.

It should be noted that the contents of this section are summarizations and amalgamations of information contained elsewhere in the FA Policy. As such, it is prudent to ensure that the contents of this section ultimately align with any other updates made throughout the FA Policy.

Previous Policy Language

N/A

Proposed Language

What is the priority order for facility allocations?

- o Facility Rental Contracts are granted according to the category of user, as outlined below:
 1. City of Vaughan
 2. CSO Groups, in the following priority order:
 - a. Children & Youth CSOs
 - b. Heritage Village Fairs
 - c. Seniors Groups
 - d. Social Services Organizations
 - e. CSO Groups
 - f. Adult CSO Groups
 - g. Emerging CSO Group
 3. Residents
 4. Commercial Groups
 5. Non-Residents
- o The City uses the previous years' facility allocation to form the basis for the upcoming year.

What are the deadlines for requesting a seasonal facility permit?

- o Deadline dates for seasonal requests are established annually by the Recreation Services Department and may be different for each facility type. An invitation letter and request form are sent to previous years users approximately 4 weeks prior to the applicable deadline dates. New users must contact the department to be placed on a mailing list or can apply using the request form available on-line.

What is the process for requesting a seasonal facility permit?

1. An invitation letter and request form are sent to previous years users approximately 4 weeks prior to the applicable deadline dates. (See Timing Section noted below.) New users must contact the department to be placed on a mailing list or can apply using the request form available on-line.
2. Users must submit request forms for the following year indicating organizational profile, facility types, 1st and 2nd choices of dates and times being requested (including tournaments). All request forms must be signed and dated in order to be processed. E-mailed requests must be submitted through the organizations main contact holder's e-mail address.
3. Requests are to be returned to the Recreation Services Department, Client Services Division, Permitting Unit of the or e-mail to RecPermits@vaughan.ca by the advertised deadline date in order to be considered.

Is it possible to sublet or transfer permits to another user or group?

- o Subletting of any facility is strictly prohibited. The Department of Recreation Services will issue a formal written alert to at least one Executive Member asking that the practice be stopped immediately and excess times be given back to the City. A second incident will result in the cancellation of the rental contract.

What happens if a permitted facility is not being used during the permitted time?

- o In the event of a permitted facility not being used during the permitted time, the Department of Recreation Services will issue a formal written alert to at least one Executive Member. Subsequent occurrences will result in progressive action and cancellation of the rental contract.
- o In the event a permitted user is aware it will not be able to use the facility during the permitted time (e.g., a sports group has a conflicting away event during their seasonal permit time), it is requested that the user notify the City via the following link [URL]. It should be noted that the

City will not reimburse the user for the facility if it was a seasonal booking, and is requesting this information solely for the purposes of monitoring permitted non-use at City facilities and to facilitate compliance with stated policies.

4.3 Supporting Recommendations

Through the various stakeholder engagement activities conducted as part of this review, a number of additional opportunities and challenges were identified. While many of these opportunities and challenges have informed the recommendations provided above, some identified opportunities did not necessitate direct changes to the FA and CSO Policies or their supporting processes. However, it is important to document these opportunities, and a set of supporting recommendations has been provided below:

- The previous review of the Ratepayer Group policy recommended that the updated Ratepayer Group Policy be contained within the CSO Policy, and hence the Ratepayer Group Policy would be replaced. As such, this updated Policy was incorporated within the updated CSO Policy. However, the Ratepayer Group policy was outside of the scope of this review, and as such, the City developed the provided the language to be included within the CSO Policy. Additionally, the City also opted to include its general Code of Conduct language within both the CSO and FA Policies.
- The implementation of the recommendations provided above may exacerbate resource capacity constraints within Recreation Services. To maintain the high-level of service and responsiveness that stakeholders expect and have appreciated to date, additional resources may be required to support the implementation of these recommendations, as many Recreation Services staff currently wear multiple hats and would be required to support implementation efforts in addition to their current responsibilities.
- There is an opportunity to develop a 'Facility Storage Policy', in coordination with Facilities Management, to govern how CSOs and ratepayer groups could qualify for on-site storage, as well as the associated processes and costs.
- There is an opportunity to develop a 'Services-In-Kind Policy' that would clearly outline the potential services or facilities that could be provided for special events and tournaments, and the processes for obtaining those services.
- There may also be a need for supporting procedures documents to support the implementation and sustainment of the updated policies, to ensure that activities are conducted in a thorough and consistent, equitable, and fair manner. For example, the City may choose to develop an enforcement procedures document, which would outline the protocols and processes required for following up on reported instances of permitted non-use.

5.0 Implementation and Change Management

5.1 Proposed Sequence of Recommendation Implementation

Figure 4 below is designed to provide the City with a clear sequence by which the recommendations developed can be implemented. As the City will begin implementing its changes when it feels it is appropriate and effective, the Optimus SBR team has left timelines at the quarter level. Whenever implementation is formally expected to begin is when "Q1" can be started.

It is expected that the City will need to complete a number of activities prior to beginning implementation of the policies in "Q1", such as communicating changes with existing CSO groups and stakeholders, and determining funding requirements for items such as implementing signage or developing online portals.

For a full listing of change management and implementation considerations, see Section 5.2 below.

Figure 4: Proposed Implementation Schedule

Recommendation	Q1	Q2	Q3	Q4	Q5
CSO 2: Formally implement bi-annual reporting for established CSO groups	■				
CSO : Place additional financial controls on CSO eligibility for rate subsidies	■	■			
CSO 5: Include a 'Frequently Asked Questions' section in the CSO Policy		■			
FA 2: Include a 'Frequently Asked Questions' section in the FA Policy		■			
CSO 4: Include a DEI statement that aligns to the City's overarching DEI strategy		■	■		
CSO 3: Deploy an <i>online</i> portal for groups to submit their applications and reporting requirements		■	■	■	■
FA 1: Review and refresh enforcement policies and procedures		■	■	■	■
CSO 1: Introduce an 'emerging group' status			■	■	■

5.2 Implementation and Change Management Considerations

Figure 4 above outlines a proposed sequence and flow by which recommendations can be implemented. This suggested flow accounts for the following factors:

- o The Recreation department's staff are consistently busy and will need to balance the implementation of recommendations against their ongoing workloads. To this end, not all recommendations can be started at the same time, but rather will need to be prioritized appropriately.
- o Quick wins are used to help "check items off the list", build good will with stakeholders, and to help build momentum when taking on longer or more challenging recommendations in the future.
- o Some recommendations (e.g., CSO 3 and FA 1) will take longer periods of time due to the required messaging, communication, planning, and technology requirements that will be necessary for success.
 - These recommendations should start early, building on quick win momentum, but will need to be ongoing efforts to account for the sensitivities they will need to navigate to be successful.

In addition to these broad, overarching implementation considerations, some specific change management considerations will be important to ensure success for the Recreation department moving forward. Specific to each individual recommendation, some change management considerations include:

- o CSO 1 – Develop an "Emerging Group" Status:
 - This will require the Recreation department to communicate outward with its stakeholders the meaning of the "Emerging Group" status, and should have a structured communication plan developed prior to launch.
 - The communication plan should include stakeholders such as:
 - Existing CSOs;
 - Those groups who have previously failed to achieve CSO status;
 - City Council; and,
 - The broader public.
 - Additionally, the Recreation department will need to determine the type and level of benefits that this group will receive.
- o CSO 2 – Formally Implement a Bi-Annual (every 2 year) Requalification Process for Existing CSOs

- This recommendation can and should be framed to all stakeholder groups as a clear benefit that will support their operations in the future.
 - City staff should understand that this is a reduction in non-essential work;
 - CSOs should understand that this streamlines their engagement activities with the City and makes the lives of their (often volunteer) administration easier; and,
 - City Council should understand that this is part of an ongoing review of continuous improvement for the City to streamline work.
- o CSO 3 – Deploy an *online* portal for groups to submit their applications and reporting requirements
 - This recommendation will require additional time to deploy, as it will require the Recreation department to undertake a technology development process that will include the following:
 - Identifying the full complement of functionality that is required by the online portal (e.g., is it just to submit documents, will it store information to streamline future processes, should it be used to support self-reporting related to Recommendation FA 1, etc.)
 - Review the systems in place in the City today to understand what can be leveraged to reduce costs and/or identify what systems should be procured in the future to support this.
 - Once a system/solution is in place, a development timeline and testing period will be required.
 - There will be a need to communicate out this portal to stakeholders, so they understand what it entails and how it can be used.
 - Staff will likely be needed to be on-hand to train CSOs/stakeholders in using the tool.
- o CSO 4 – Include a DEI statement that aligns to the City’s overarching DEI Strategy, which CSOs must agree to align or adhere to
 - This process can be relatively quick, but will require the Recreation department to work closely with the DEI Officer for the City to ensure any language or content developed and included is aligned to DEI Strategy/Policy language.
 - There will likely need to be a communication plan developed that will outline what this means for stakeholders.
- o CSO 6 – Place additional financial controls on CSO eligibility for rate subsidies
 - Once the policy is approved and posted, the City will have the ability to request this information from CSO groups.
 - However, the City should develop clear processes and procedures for how this information is requested, received, and reviewed, as well as outline some principles for what types of scenarios could result in the denial of CSO eligibility for subsidized rates.
- o CSO 6 – Include a ‘Frequently Asked Questions’ section in the CSO Policy or website
 - While Optimus SBR has identified some potential questions for consideration, the City should review to determine if other questions will need to be added prior to launch.

- This recommendation can happen relatively quickly, and can be used to help build momentum for other more challenging recommendations.
- There should be a periodic review process to determine if information will need to be refreshed, or if additional questions need to be added.
- o FA 1 – Review and refresh the enforcement policies and procedures
 - When implementing a self-reporting tool, the City will need to ensure it has identified and classified the various possible reasons for which a facility may be permitted for a time, but not used.
 - As part of the rollout of the self-reporting tool, the City will need to have a clear rationale developed and standardized communications in the event that CSOs or other stakeholders voice concern or displeasure. Having a set communication plan will reduce the chance for mixed messaging, and stakeholders getting upset as a result.
 - Capital funding would likely need to be secured before implementing a self-reporting tool. In the short-term the City may choose to leverage its existing PerfectMinds platform or develop a fillable PDF that can be used.
 - As a community reporting process is developed, the City will need to make sure it has a system/process developed and publicized so that groups provide information in a standardized and effective manner to support decision-making.
 - This should include outlining where reports are made, the content they will need to include, and a follow-up process from the City to ensure those reporting issues know their content was received and what next steps may include.
 - Developing and implementing the suggested graduated enforcement process is designed to address the concerns of all stakeholders:
 - Those who want more stringent or aggressive penalties for permitted non-use will see that the City is taking steps to rectify the issue.
 - Those who voiced concern that penalties would be unfair for the volunteers that work in and lead CSOs should not have issue, as the individuals are not the recipients of penalties, but rather the CSO broadly is affected.
 - The City will have a clear process and standard that it can apply uniformly to each CSO and each timeslot. This will reduce ambiguity and increase effectiveness for the future.
 - Creating the enforcement process will require the City to develop a clear communications strategy as this will be seen as a controversial issue for some groups.
 - Early planning and communication will be essential for the success of this initiative.
 - Seasonally updating signage at outdoor facilities noting regularly permitted time will require communication to the broader public on the purpose of the signage, as well as coordination with the Parks Department to determine funding and processes for implementing and updating the signage on a seasonal basis.
 - Staff will need to plan the process by which signs are developed and posted regularly.
- o FA 2 – Include a ‘Frequently Asked Questions’ section in the FA Policy or website

- While Optimus SBR has identified some potential questions for consideration, the City should review to determine if other questions will need to be added prior to launch.
- This recommendation can happen relatively quickly, and can be used to help build momentum for other more challenging recommendations.
- There should be a periodic review process to determine if information will need to be refreshed, or if additional questions need to be added.