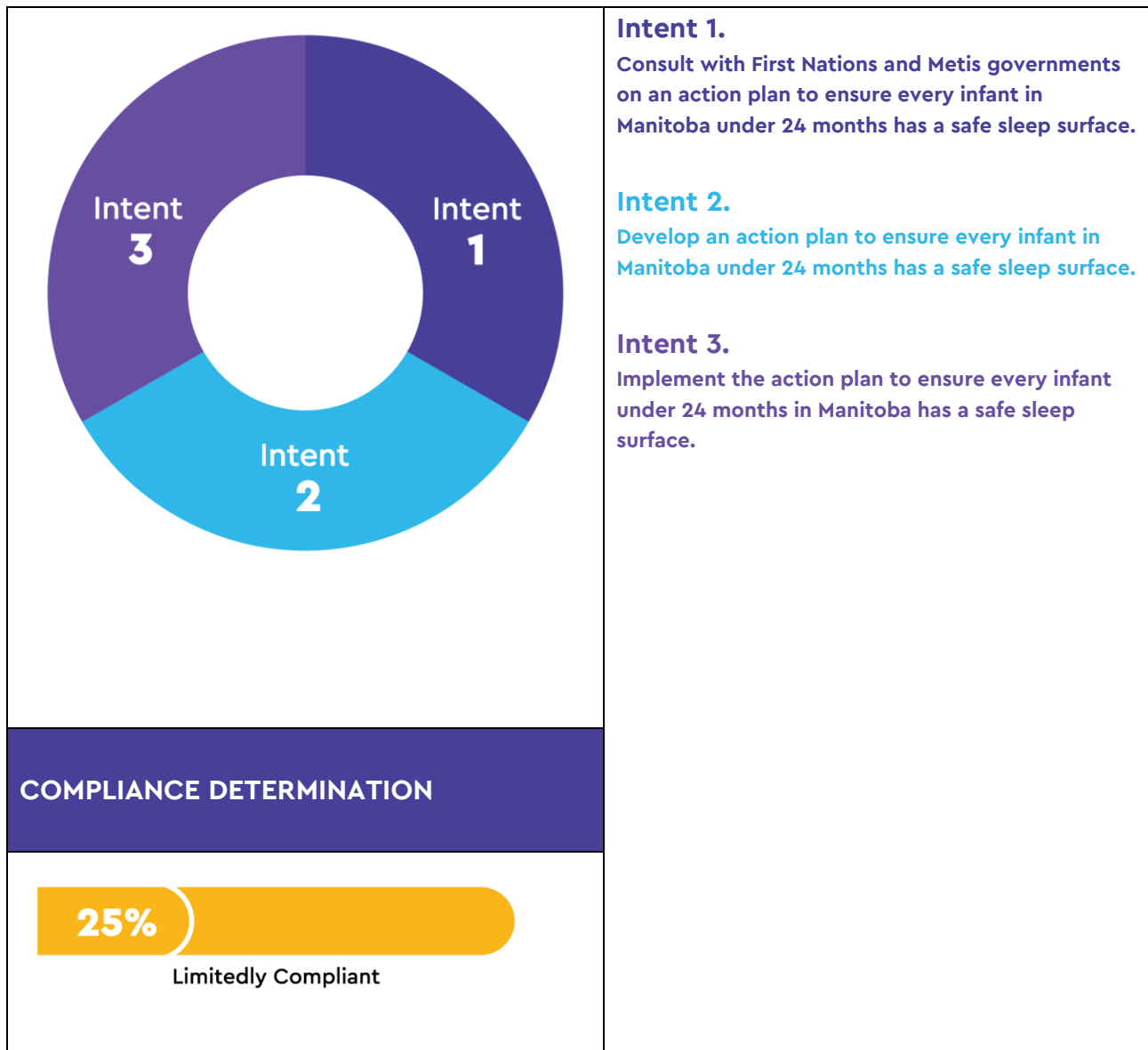


COMPLIANCE DETERMINATION

Safe Sleep – Recommendation 1

Recommendation Summary: Develop an action plan to ensure every infant in Manitoba has a safe sleep surface (crib, bassinette, or culturally appropriate safe alternative).

Primary Public Body: Government of Manitoba



Recommendation Compliance Summary



This form details the assessment of compliance with recommendations made under Section 27 and Section 31 of *The Advocate for Children and Youth Act*. MACY assesses recommendations for compliance once a year but receives updates from the public bodies every six months.

1. Recommendation Information	
Report Name:	Safe and Sound: A Special Report on the Unexpected Sleep-Related Deaths of 145 Manitoba Infants
Date Released:	3/13/2020
Full Recommendation: (including details)	<p>Recommendation One:</p> <p>The Manitoba Advocate for Children and Youth recommends that the Government of Manitoba develop and implement an action plan, in consultation with First Nations and Metis governments, to ensure that every infant in Manitoba under 24 months has a safe sleep surface (crib, bassinette, or culturally appropriate safe alternative) in which to sleep. The action plan ought to be targeted to both expectant parents and caregivers of infants under 24 months who cannot afford to purchase a safe sleep surface. The action plan will be designed and delivered based on the child-first and substantive equality principles.</p> <p>DETAILS:</p> <ul style="list-style-type: none"> • An action plan will prioritize the rights of children over jurisdictional or administrative barriers (child-first principle) and achievement of true equality in outcomes (substantive equality). • The action plan will explore recycling and loan programs, and other cost-effective and innovative approaches. • Parents or caregivers living with low incomes and needing a safe sleep surface will be identified through multiple systems including the health care system, Employment and Income Assistance, the Manitoba Prenatal Benefit Program, and Child and Family Services. • Parents or caregivers in need of a safe sleep surface will be able to self-identify. • As per the principle of non-discrimination detailed in the UNCRC, eligibility criteria will ensure that there is no discrimination of any kind, including national or social origins, or on the basis of race, or residence in a rural or remote community. • Existing governmental policies in the child welfare and social assistance programs that relate to the distribution of safe sleep surfaces will be reviewed and revised if they do not comply with the child-first principle. • Barriers to accessing cribs will be identified and mitigated.

	<p>IMPACT:</p> <ul style="list-style-type: none"> All infants in Manitoba will have a safe sleep surface as is necessary to realize their inherent rights to the highest attainable standard of health and to live and thrive (UNCRC, Art. 24, 6). The Government of Manitoba will ensure that caregivers have the financial and physical resources they need to support child health and wellbeing (UNCRC, Article 27).
Intent(s) of Recommendation:	<ol style="list-style-type: none"> Consult with First Nations and Metis governments on an action plan to ensure every infant in Manitoba under 24 months has a safe sleep surface. Develop an action plan to ensure every infant in Manitoba under 24 months has a safe sleep surface. Implement the action plan to ensure every infant under 24 months in Manitoba has a safe sleep surface.
Issue:	Safe Sleep
Public Body	Government of Manitoba
Dates of Previous Official Updates from Public Body:	May 31, 2023
	June 30, 2022
	May 31, 2021
2. Compliance Determination	
Limitedly Compliant 0.25	Actions taken only implement a small part of the recommendation, requirements are only fulfilled to a limited degree by actions taken, resulting in significant deficiency in implementation.
Self-Assessment	Partially Compliant
Previous Compliance Determination	Non-Compliant
3. Rationale for Determination <i>(How did you reach this compliance determination)</i>	
<p>Intent 1: Consult with First Nations and Metis governments on an action plan to ensure every infant in Manitoba under 24 months has a safe sleep surface.</p> <p>2023</p> <ul style="list-style-type: none"> Further detail was provided on last year's response, where it is identified that there is Indigenous representation on the joint work being led by Public Health on the recommendations in this report. <p>2022</p> <ul style="list-style-type: none"> The response from the Government of Manitoba states, "Indigenous representation is included in the working group addressing Public Health responses." 	

2021

- No actions have been reported about reaching out to Indigenous governments as the Government of Manitoba is still determining next best steps internally before reaching out to external stakeholders beyond its jurisdiction.

Intent 2: Develop an action plan to ensure every infant in Manitoba under 24 months has a safe sleep surface.**2023**

- The Government of Manitoba has reported initial steps on work related to the development of an action plan for ensuring access to safe sleep surfaces.
 - A working group has been established that includes, Dr. Lynne Warda, and representatives from Public Health, the Child and Youth Services Division, Employment and Income Assistance, Manitoba Status of Women, Healthy Baby Benefit, and WRHA Injury Prevention. As the first steps in the work of this group, information is being shared about what services each provides to support parents accessing sleep surfaces, past work on what has been successful and what has not, identified priority areas, and potential areas under consideration. Manitoba identifies that this work is in early stages, and additional information will be shared as further work is undertaken.
- In addition to the development of the working group, information was provided under this intent regarding the reiteration of the programming/supports identified in the 2022 response.
- Information is also provided identifying the standards that exist for both Public Health Nurses and CFS staff. Public Health Nurses standards include the requirement to assist families in obtaining a safe sleep surface if they cannot on their own. CFS standards have been amended to include safe sleep surfaces in safety assessments when working/planning with expectant parents.
- Information provided regarding the Child and Youth Services Division identified that staff have recently participated in a Safer Sleep webinar, with plans to develop an e-learning module based on the content of the webinar. Additionally, at their request, MACY provided the CYSD with additional information/analysis on the cases included in the Safe Sleep report where CFS involvement was identified. This will aid in further review and prioritization of efforts to address information found in that analysis.
- The Department of Indigenous Reconciliation and Northern Relations is noted to have provided funding to MKO's Thompson Urban Aboriginal Strategy Baby Basket Program. This program collaborates with Thompson hospital to provide a maternity package tailored to expectant parents/mothers. It is anticipated to support 150-200 mothers and newborns in 2023.
- The Government of Manitoba reiterated a sentiment found in the 2022 response, that there are a number of ways work in the province is already addressing this need, that were not previously examined by MACY.

- Through this sentiment, MACY notes the need for further discussion with the Government of Manitoba on the purpose of making this recommendation. To recommend an action plan for ensuring access to safe sleep surfaces is not to insinuate that no resources exist for providing access to safe sleep surfaces for Manitoba families. As indicated in the development of the working group of experts and relevant collaborators, the work towards an action plan is rooted in understanding what is available, what may be improved, prioritizing next actions, and improving how that information is disseminated to the individuals and families who require it.

2022

- The response from the Government of Manitoba states, "This report identified that approximately 75% of infants whose deaths were included in the research had a safe sleeping surface available in their home. The report had individual examples but no analysis of the issue of access to safe sleeping surface for the remaining 25%, did not include information or analysis of existing support in Manitoba to assist low income families in obtaining safe sleeping surfaces, or analysis showing issues related to access to these programs. The report did not include peer reviewed medical studies correlating outcomes for children over 12 months of age related to sleep surfaces."
 - The above statement is followed by a statement supporting the position that a safe sleep surface is best for infants as related to ages newborn to 12 months, as supported by best practice data.
- MACY accepts that no analysis was taken on the 25% of infants and their families on the issue of access to safe sleep surfaces. The implication of 1 in 4 infants dying without a safe sleep surface available in their home was deemed sufficient to recommend the government have a suitable action plan in place to ensure that all Manitoba families have access to a safe sleep surface, or at minimum have easy access to the information that supports families in knowing how to financially access safe sleep surfaces if needed. In addition, while the implications of safe sleep practices change as infants age, families may still need to access cribs for infants in the 12-24-month age range – the data shows that infants in that age range have still died with safe sleep risk factors present.
- The responses additionally discuss that the work of public health nurses, EIA staff, CFS case workers, and hospital social workers includes assisting families identifying economic barriers to obtaining safe sleep surfaces. The resources identified as being utilized include;
 - EIA funding for infant needs can be used to purchase safe sleep surfaces. The funding provided is \$250 for first child, \$75 for subsequent (https://www.gov.mb.ca/fs/eia_manual/21.html).
 - Healthy Baby Prenatal Benefit is paid to low income expectant parents and can be used towards any cost at the discretion of the expectant parents,

including purchasing a safe sleep surface (https://web2.gov.mb.ca/laws/regs/current/_pdf-regs.php?reg=89/2001).

- Care providers to children who have low incomes but do not receive EIA benefits are eligible for the Manitoba Child Benefit, which can be used for purchases at the discretion of the care provider (<https://www.gov.mb.ca/fs/eia/mcb.html>).
- Other community-based resources which support providing families with safe sleeping surfaces include community agencies and organizations such as You Can't Spoil A Baby (<https://youcantspoilababy.org/donate/what-to-donate/>).
- Community second hand and thrift stores.
- The response further includes a statement on how a purchased crib is not required to have a safe sleep environment, and if a parent chooses not to have one, alternatives such as dresser drawers or laundry basket can provide safe environment for newborns and young babies (<https://healthyparentingwinnipeg.ca/safe-sleep-and-your-baby/>). Public health is identified as available to help parents learn about alternatives, as discussed in their most recent Safe Sleep pamphlet. The pamphlet includes reference for parents to contact public health if they need assistance in setting up an alternative safe sleep environment, but it does not include reference to how parents can get financial support for a safe sleep surface if needed (<https://healthyparentingwinnipeg.ca/safe-sleep-and-your-baby/>).
- An action plan to ensure families in Manitoba have access to safe sleep surfaces is not found in this response. Proper evidence is not provided that the Government of Manitoba understands the need for financial support for safe sleep surfaces, or that the available resources adequately cover the financial realities of accessing necessities for newborns. Many of the benefits and financial resources identified above are intended to cover a wide range of expenses experienced by parents. The reality of inflation in Manitoba and Canada requires a more detailed understanding on how parents are utilizing these benefits, and whether they are appropriate for covering necessities for newborns.

2021

- No actions have been reported on the development of an action plan as the Government of Manitoba is still reviewing what is required for this recommendation, including how to proceed on analyzing pre-existing programs in Manitoba that support families in accessing safe infant sleep surfaces.

Intent 3: Implement the action plan to ensure every infant under 24 months in Manitoba has a safe sleep surface.

2023

- See response under intent 2.

2022

- The response from the Government of Manitoba referred to their response to Intent 2. No action plan appears to have been developed or implemented.

2021

- An action plan has not been developed yet that can be implemented.

Analysis Summary: Through the responses provided to this recommendation in both 2022 and 2023, there is an expressed need for further collaboration and understanding between MACY and the Government of Manitoba, on what the purpose of an action plan for ensuring access to safe sleep surfaces encompasses, and how the important work already in action across the province can contribute to that action plan. There are noted important developments towards implementing this recommendation such as the development of the working group described under intent 2, as well as the increased emphasis on standards followed by public health nurses, and Child and Family Services staff for assisting families in accessing safe sleep surfaces. As the information provided begins to align with the purpose and intents of this recommendation, it is now considered Limitedly Compliant.