



BRAMPTON

Flower City

IS-1-1

Report

City Council

The Corporation of the City of Brampton

Date: July 19, 2013

BRAMPTON CITY COUNCIL

File: G02.General

DATE: August 7, 2013

Subject: Licensing of Children's Entertainers

Contact: Wendi Hunter, Manager of Administrative Services and Elections, Council and Administrative Services, Corporate Services, (905) 874-2139

Overview:

- In February, 2013, Council considered a report regarding licensing of children's entertainers and resolved to establish a licensing system.
- In March, 2013, Council directed staff to seek input from stakeholders (those involved in entertaining children either as a business, or on a volunteer basis), and the public regarding the proposed licensing system inside the larger context and objective of protecting children.
- Information regarding Council's intention was publicized through an information page on brampton.ca and advertising in local media. Stakeholders and the public were invited to attend a community forum and/or provide input in writing.
- A community forum and discussion meeting was held the evening of Wednesday, May 22, 2013.
- This report discusses results of the consultation and requests Committee of Council's direction regarding scope, and applicability of a licensing system.

Recommendations:

1. That the report dated July 19, 2013, from Wendi Hunter, Manager of Administrative Services and Elections, Council and Administrative Services, Corporate Services, to the Council meeting August 7, 2013, re: **Licensing of Children's Entertainers**, be received, and
2. That Council direct staff to develop an awareness campaign regarding children's entertainers, and
3. That a copy of this Recommendation be forwarded to the Provincial Government, the Federal Government, area Members of Parliament and Members of Provincial Parliament, the Federation of Canadian Municipalities, and the Association of Municipalities of Ontario and to work proactively collectively towards the greater protection of children by licensing children's entertainers.

Background:

In response to a delegation to Committee of Council from Ms. Linda Beaudoin, Advocate for Children's Rights, Council directed staff to investigate options for establishing a business licence for children's entertainers.

On February 20, 2013, Committee of Council considered a staff report recommending against establishing a system for licensing children's entertainers. Council received a number of delegations regarding the matter on February 27, 2013, and passed the following recommendation:

- CW053-2013
1. That the delegation from Ms. Linda Beaudoin, to the Committee of Council Meeting of February 20, 2013, re: **Licensing of Children's Entertainers** (File G02) be received; and,
 2. That the report from W. Hunter, Manager of Administrative Services and Elections, Corporate Services, dated February 7, 2013, to the Committee of Council Meeting of February 20, 2013, re: **Licensing of Children's Entertainers** (File G02) be received; and,
 3. Whereas on February 20, 2013, Brampton Committee of Council considered a staff report (dated February 7, 2013) regarding the licensing of children's entertainers, with such report responding to a 2011 request from Ms. Linda Beaudoin, Brampton resident and tireless advocate for child abuse prevention and awareness; and

Whereas children's entertainers have the opportunity and ability to establish a relationship and rapport with children which, on very rare occasions, may put children in danger of becoming victims of abuse; and

Whereas even one such crime against a child, or potential for such a crime, is one too many and steps need to be taken to protect children from potential threats; and

Whereas steps can be taken by municipalities, in the absence of action by senior levels of government, to use available municipal tools, such as the municipal licensing system, to regulate children's entertainers to protect children; and

Whereas a municipal licensing system, may permit a municipality to license children's entertainers operating within the municipality, and contribute to the protection of children by requiring children's entertainers to provide a mandatory police services vulnerable sector check (VSC) confirmation as a condition of a municipal licence to operate within the municipality; and

Whereas a vulnerable sector check (VSC) is a common and normal requirement and condition for adults working with and in contact with children in sports associations and youth organizations; and

Whereas notwithstanding the staff report recommendation not to license children's entertainers under the provisions of the Municipal Act, 2001, due to reasons include definitional concerns regarding the scope of a children's entertainer, concerns regarding the requirements for police service vulnerable sector check (VSC) requirements and by-law enforcement issues, Committee of Council recommended the establishment of a licensing system for children's entertainers, to be a municipal leader in this area, and requested staff to report back to Committee of Council on an implementation plan and necessary Licensing By-law amendment;

Therefore Be It Resolved That Brampton City Council establish a licensing system for children's entertainers operating within the City of Brampton and that staff be requested to report back to Committee of Council on an implementation plan and necessary Licensing By-law amendment, with such implementation plan to include the development and execution of a public service campaign to create awareness about licensing children's entertainers in the City; and

Be It Also Resolved That a copy of this Resolution be forwarded to the Provincial Government, the Federal Government, the Association of Municipalities of Ontario and the Ontario and Canadian Associations of Chiefs of Police, requesting senior levels of government, municipalities and associations to join the City of Brampton in licensing children's entertainers to protect children.

Prior to the February 27, 2013 Council meeting, no formal public consultation had been conducted regarding the issue. On March 27, 2013, Council passed the following recommendation:

CW084-2013 Whereas Council has directed staff to undertake the development of a Licensing By-law for children's entertainers in the City of Brampton,

Therefore Be It Resolved That staff be directed to seek input from organizations, agencies and individuals directly impacted by such a licensing requirement and interested members of the public; and report back to Council with any recommendations or suggestions which may strengthen Council's objective of protecting children in the community.

Information regarding Council's decision to establish a licensing system for children's entertainers was published in the form of a Press Release in February, 2013. In response to Council's March 27, 2013 direction, staff scheduled a consultation meeting for May 22, 2013,

to receive stakeholder and public input. An information page on the City's external website was published with links to the staff report and minutes of Council, and encouraging input through email, regular mail, and participation in the consultation meeting.

Approximately 25 people attended the consultation meeting on May 22, 2013. Those present included licensing system advocates, volunteers, members of service groups, e.g. Kiwanis, professional entertainers, and members of the general public interested in the issue.

Staff presented the agenda for the evening (included as Appendix A to this report), the ground rules and etiquette for speakers and the audience, an overview of Council decisions on the issue, a brief explanation of what would be required for a licensing system, and issues that need to be addressed. The floor was then opened for comments from the audience. Notes from the meeting including summaries of comments received have been attached as Appendix B to this report.

To date, 11 written submissions have been received through the external website and email. These submissions have been attached as Appendix C to this report.

Current Situation

Input Received from Stakeholders and the Public (see Appendices B and C)

Some of the suggestions heard through the consultation process include the following:

- license everyone who entertains children, including volunteers,
- license those who entertain children professionally, or who only entertain at private parties,
- don't require volunteers at public events like parades and festivals to be licensed,
- don't license anyone – the responsibility for governance should rest with the Provincial or Federal governments,
- educate children's entertainers about the benefits of obtaining Vulnerable Sector Checks (VSC) and educate parents about requiring proof of a current VSC prior to hiring an entertainer.

Questions regarding scope of a licensing regime have also been asked. For example:

- If the City licenses individual entertainers, such as clowns and magicians, why not require that all carnival and circus workers, set-up and clean-up crews, and anyone working at an event venue also be licensed?
- Should a licensing regime include entertainers for all vulnerable sectors, i.e. those that entertain the elderly or disabled?

Difficulties with a licensing regime have been brought forward:

- Organizations that hold significant events, e.g. Rib-n-Roll, Classic Cars and Legendary Stars may have difficulty hiring entertainers if they are required to be licensed.
- Most professional children's entertainers have already obtained a Criminal Records check (or Vulnerable Sector check), and obtaining a licence would be an unnecessary additional expense.
- Many professional entertainers are from outside Brampton, and come for one or two events a year. There is the potential that these entertainers will stop coming to Brampton to entertain, otherwise limiting the choices for families, business, etc.
- Many professional children's entertainers will endeavor to comply with the by-law and obtain licences. However, some will not and still continue to work in Brampton, creating an unlevel playing field for entertainers in the city.

Enforcement of a Licensing System

Consultation with stakeholders, and other interested persons, did not eradicate the range of challenges associated with enforcing a licensing system. The Enforcement and By-law Services Division have provided the following comments:

1. Children's entertainers are usually hired to perform at private functions in houses, or backyards. In order to prosecute, Enforcement and By-law Services (EBS) would require proof of the performances. What is more, access to private property is only permitted when the owner invites, or permits, EBS staff to enter. Enforcement would be limited to the purview of the Division, which would be confirming that a licence has been obtained.
2. Pro-active enforcement would be difficult since the dates and times of performances would not be known to EBS staff.
3. Achieving compliance would be difficult in cases where an entertainer is hired 'last minute' or from outside of Brampton. The shorter the time period between booking and performance, the less likely the entertainer would have time to comply with the by-law, even if the entertainer, or person hiring the entertainer, was aware of the licensing requirement. This deficit of time and lack of knowledge would likely not stop the performance from happening. Licences are not issued on the spot.
4. Enforcement officers do not have the authority to demand identification which makes laying charges difficult. A charge would be laid for acting as a children's entertainer without a licence, and nothing more.

5. Should Brampton and other municipalities decide to implement licensing systems, and due to the transient nature of the business of entertaining children (it is unlikely a Brampton entertainer would only entertain in Brampton), entertainers endeavouring to comply with multiple licensing schemes and various licensing requirements could face financial hardship.
6. Incidents of concern arising at performances and beyond the scope of licensing may involve the Peel Regional Police.
7. A licence as discussed in this report does not guarantee the safety of any individual child, or adult.

Development of a Licensing System

The development of a licensing system requires, at a minimum clear definition and scope. A number of questions and issues remain, including:

a) Who to Licence

- Adults only, or those 16 and over?
- Paid, full-time and part-time professional entertainers?, including:
 - Clowns
 - Musicians
 - Face painters
 - Magicians
 - Santas and other holiday characters (including those working in malls/department stores)
 - Exhibitors (e.g. travelling reptile exhibitions, etc.)
 - Mascots
 - Shriners, and other service club representatives
 - Acrobats
 - Jugglers and buskers
- Paid and unpaid staff providing services at places and events geared towards children?
 - Carnival and circus employees
 - Businesses providing party services to children, including such establishments as McDonald's and Chuck E Cheese
 - Assistants to performers and entertainers
 - Operators of entertainment/assembly venues (Inflatable/Bouncy Castles)
- Volunteers?
 - Those providing any of the services listed above in a volunteer capacity

b) For What Purposes

- Private events in homes or other private facilities, e.g. birthday parties?
- Neighbourhood and 'block' parties?
- Festivals and events organized through churches, or cultural organizations?
- Festivals and events organized by not-for-profit or service organizations (e.g. Rib-n-Roll, Classic Cars and Legendary Stars)?
- City of Brampton organized or sponsored events, e.g. Flower City Parade, Canada Day celebrations?

The scope is challenging to define, however with Council direction a Schedule to the Stationary Licensing By-law could be presented to Council in the late fall of 2013. Licensing requirements would not be effective until January, 2014. At a minimum Staff will develop an application process including the following requirements:

- a completed application accompanied by the appropriate fee;
- a Vulnerable Sector Check (VSC) conducted by the Police Services in whose jurisdiction the applicant resides (cost of obtaining the VSC will be the responsibility of the applicant);
- a photograph of the applicant (taken by the Licensing Staff);
- proof of status that the applicant can legally work in Canada.

A licence issued to a children's entertainer would show, on its face, a photograph of the licensee and contact information, and be considered a public document. Licences would be issued yearly, and a new VSC would be required each year. Grounds for refusal of the application, in addition to grounds established in the general provisions section of the Licensing By-law, would include any evidence on the VSC of an offence, e.g. assault, abuse, etc., against children. The VSC includes information regarding convictions, pardoned sex offences, relevant details from the RCMP National Criminal Records Repository, and details from local police records.

A decision by the Licence Issuer, in this case the City, to refuse to issue a licence can be appealed to the Brampton Appeal Tribunal. Any decision of the BAT is final, but the applicant has other avenues including the Human Rights Tribunal and, of course, civil action.

The licensee would be required to have the licence on his or her person at all times that the licensee is entertaining, and produce it for inspection by Enforcement staff upon request.

Brampton staff would negotiate agreements with Police services around the GTA and southern Ontario regarding the accessibility of Vulnerable Sector Checks for applicants. The time required for these negotiations has not yet been determined.

Communications regarding the licensing of children's entertainers would be included with communications around the new Stationary Licensing By-law.

Conclusion:

Staff is still of the opinion that the City should not license children's entertainers. The majority of input received through the public consultation process acknowledges the difficulties in implementing such a system. The greater concern of potentially providing a false sense of security given the limitations of a system of licensing and enforcement despite good intentions lingers, and it is suggested that higher levels of government be encouraged to give close attention to this matter as a policy matter.

Until such a time that Provincial or Federal bodies deal with the issue, Staff would recommend expanded safety education of parents, caregivers and entertainers.



Peter Fay
City Clerk



Peter Simmons
Commissioner, Corporate Services

Report authored by: Wendi Hunter, Manager of Administrative Services & Elections, Council and Administrative Services, Corporate Services

List of Appendices:

Appendix A	Staff Presentation – May 22, 2013 Consultation Meeting
Appendix B	Meeting Notes – May 22, 2013 Consultation Meeting
Appendix C	Written Submissions

Appendix A

Licensing of Children's Entertainers Community Forum & Discussion

I5-1-9

May 22, 2013

Agenda

1. Welcome and Introductions
2. Ground rules and etiquette for speakers and audience
3. Overview of Council Decisions
4. What is required for a licensing system?
 - How would it work?
5. Discussion and Comments from Stakeholders and Community Members
6. Wrap-up – next steps

15-1-10

Ground Rules & Etiquette

- This is a forum for discussion, and sharing information and observations
- Everyone who wishes to will be given an opportunity to speak
- Speakers who indicated upon arrival their desire to speak will go first, in order of sign-up
- Each speaker will be limited to 5 minutes
- After “signed-up” speakers, anyone else who would like to speak will also have the opportunity
- If you have questions of a speaker, please wait until he or she has finished to ask your question (questions from the audience may extend the 5 minute time limit).
- No decisions are being made tonight – comments will be reported to Committee of Council
- Please be respectful of others’ opinions – we are all here to discuss a common goal – the safety of children

Council Decisions

June 22, 2011

Recommendation CW 214-2011

Directed staff, as part of the comprehensive review of the Licensing By-law, to investigate options for establishing a business licence for entertainers for children, including a requirement for a criminal records search.

IS-1-12

Council Decisions

February 27, 2013

Recommendation CW 053-2013

Considered staff report, directed staff to establish a licensing system for children's entertainers and requested staff to report back to Committee of Council on an implementation plan and necessary Licensing By-law amendment.

15-1-13

Council Decisions

March 27, 2013

Recommendation CW 084-2013

Directed staff to seek input from those directly impacted by such a licensing requirement and interested members of the public, and report back to Council with any recommendations or suggestions which may strengthen Council's objective of protecting children in the community.

15-1-14

What is required for a children's entertainers' licensing system?

- Authority provided by the Municipal Act and the City's Licensing By-law
- City Council would have to define scope, for example
 - Professionals and volunteers?
 - All entertainers, or certain categories?
 - Public events, and/or private events?
 - Include or exclude assistants?

15-1-15

How would a system licensing children's entertainers work?

- Potential licensees would have to complete an application, pay a fee, and satisfy City established conditions, for example:
 - Submitting results of a current Vulnerable Sector Check
 - Providing proof of insurance and proof of status that applicant can legally work in Canada (for professionals)
 - Providing (or having taken by staff) a current photograph
- Should the Licence Issuer (the City) refuse to issue a licence, that decision could be appealed to the Brampton Appeal Tribunal

15-1-16

Discussion

- Should the city issue licences?
- Who should be licensed (e.g. professionals/volunteers, performers/assistants, public/private?)
- Who should be exempt from licensing?
- What else can we do to “strengthen Council’s objective of protecting children in the community?” (e.g. communication, awareness, proactive industry)

15-1-17

Next Steps

- Staff will report to Committee of Council in June, 2013
 - Report will include input gathered tonight and from written comments received from stakeholders and the public
- If Council decides to continue with licensing scheme, a schedule will be written to be included in a comprehensive Business Licensing By-law, to be presented to Council in the fall, 2013

81-1-51

IS-1-19

Appendix B

Notes
Licensing of Children's Entertainers
Stakeholder Consultation
May 22, 2013, 7:00 p.m.
Council Chambers

Staff Present: Wendi Hunter, Manager, Administrative Services and Elections
Peter Fay, City Clerk
Peter Simmons, Commissioner of Corporate Services
James Bisson, Manager, Enforcement, Licensing
Joan LeFeuvre, Clerk's Office

Public Present: Approximately 25 persons

Mr. Peter Simmons made opening remarks welcoming those present and introduced the staff present. He pointed out that the purpose of the meeting was not to make a decision regarding licensing of children's entertainers, but to gather information that will be used in preparation of a report to Council.

Wendi Hunter outlined the agenda:

- Ground rules and etiquette for speakers and audience

Everyone will have an opportunity to speak; speakers limited to 5 minutes;
audience may ask questions of speakers once they have finished speaking;

- Overview of Council decisions

Council directed staff, as part of the comprehensive review of the Licensing By-law, to investigate options for establishing a business licence for children's entertainers, including a requirement for a criminal records search.

At subsequent meetings, Council requested staff to report back on an implementation plan and necessary by-law amendment and asked staff to seek input from those directly impacted by such a licensing requirement and then report back to Council with any recommendations or suggestions which may strengthen Council's objective of protecting children in the community.

- What is required for a licensing system?

Authority is provided by the Municipal Act and the City's Licensing By-law;

City Council would have to define scope, for example –

- Professionals and volunteers?
- All entertainers or certain categories?

IS-1-20

- Public events and/or private events?
- Include or exclude assistants?

How would it work?

Potential licensees would have to complete an application, pay a fee and satisfy City established conditions such as submitting a current Vulnerable Sector Check (Criminal Record Check); proof of insurance, proof of status that the applicant can legally work in Canada and a current photograph taken by City staff.

- Discussion and Comments from stakeholders and community members
- Wrap-up – next steps

The following persons addressed the meeting:

1. Mr. Steve Shields, Brampton Board of Trade

- Board of Trade is concerned with the safety of youth;
- Board of Trade organizes the annual Santa Claus Parade which involves hundreds of volunteers, many of whom act as clowns;
- There has never been even one incident;
- Asked that a definition of "entertainer" be provided;
- The Santa Clause Parade is a once a year event, therefore, different from "professional" entertainers;
- Non-profit organizations should be excluded from any licensing scheme; all are volunteers such as high school bands, singers, clowns; no paid entertainers;
- Make sure that any by-law solves the problem, if there is a problem;
- Including volunteers in any by-law would have a potential negative impact on volunteers.
- Board of Trade wants to be apprised of future meetings

2. Ms. Jessica Angerbauer

- Events that involve hundreds of people are different from private events where self employed clowns and entertainers go into private homes;
- Criminals create situations to lure children; it has been done many times;
- Criminals are working with children and hurting them; it has to stop;
- Get to the bigger picture, teachers and others involved with children;
- Public events involving hundreds of volunteers are different; they work for the good of the whole City.

3. Ms. Linda Beaudoin

- Was a children's entertainer and an exotic dancer;
- Why are children's entertainers not licensed when there are such people who have committed crimes against children;
- Showed photos and provided names of children/individuals who have been assaulted; had these individuals been licensed, perhaps the assaults would not have been committed'
- Why are pets licensed but not children's entertainers?

4. Mr. David Green, Trustee, Peel Board of Education

- Has been a Trustee for the past 11 years and is also President of the Brampton Safe City Association;
- Specify who should be licensed to ensure volunteers are not jeopardized;
- People who travel from town to town are more of a concern;
- Some individuals just set up their tents - they just show up – we need to regulate those people
- They should have to prove who they are and how they benefit the city
- Referred to an incident where someone was assaulted by a juggler in Niagara Falls;
- Supports licensing system, but staff and Council should ensure that good people are not affected;

5. Mr. Don Crawford, Brampton Kiwanis

- The motto of the Kiwanis is Serving Children of the World;
- Suggested volunteers who act as clowns one day per year should be exempt;
- Kiwanis organize the Celebrity Clown event; there is no contact with children;
- Puts a display of clowns in the annual Santa Claus Parade;
- Kiwanis is also concerned about protecting children but strongly oppose the proposed by-law;
- Requested that service clubs such as Kiwanis, Rotary, etc. be exempt from any licensing by-law.

6. Mr. Glen Williams, Brampton Board of Trade

- Also a member of the Rotary Club that has an event in Gage Park that involves entertainment;
- Want to be able to hire entertainers for their events which should not be made impossible and these individuals should not be captured in any by-law;
- All Rotarians are subject to a police check;
- It is a question of balance – private vs. public

7. Ms. Bev Parrish (Petunia the Clown)

- Asked questions of Linda Beaudoin;
- Has a Vulnerable Sector check;
- Licensing children's entertainers will do nothing to protect children;
- What about home day cares with less than 5 kids; dance instructors, coaches, music (don't need a license)
- Conklin amusement shows – does every worker need a license?
- Parents and kids all around whenever she performs
- What additional staffing would be required to enforce the by-law;
- Parents should be responsible for their children;
- If police checks are required, it should be the responsibility of the Province; Do not like that this is not handled as a provincial or federal issue
- Acknowledge sometimes people join "children's entertainers" to be around kids
- Since February 2013 (when Council asked for a licensing system) – there has been 4 teachers and 2 spiritual leaders charged with offending children
- Feels it is discriminatory to us – clowns
- Waste of taxpayer money

8. Ms. Sarah Parrish (Marigold the Clown) and Elementary School Teacher

- Believes there is a vendetta against children's entertainers;
- Safety of children is the responsibility of the parents;
- Children are abused by family members, coaches and teachers;
- It is naïve to think that issuing of a licence will protect children;
- Any regulations affecting children's entertainers should be at the Federal and Provincial level';
- Look to vulnerable sector check process in Australia – they have a regulatory board that sets standards and policies events
- Does not know how this would be policed, particularly if it is just the City of Brampton.
- Provided a document she compiled entitled "Canadian Law and Regulated Professions".

9. Mr. Ian Brown, Toronto Clown Circle

- Has been a clown for 25 years;
- Parents should be responsible for their children;
- If a registry is contemplated, it should be at the Provincial level.
- What are HST impacts?
- Children's entertainers are always swarmed by kids
- What about home daycare – what protection is in place

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- Did you consult by-law enforcement
- Enforcement challenges already with current by-laws
- Insists upon one adult present at all times for parties where he clowns
- A police check is no real protection
- Why target only children's entertainers
- We (clowns) have police checks already
- System no benefit to anyone except the City

10. Ms. Georgina McCallum

- Loves clowns;
- Related a story that happened to her as a child;
- Not about all the clowns – it is about private parties/events
- Not saying all clowns like that
- Not big deal to keep track of who they are
- Linda is doing good thing to protect children

In response to a question by Sarah Parrish as to why the City is only looking at children's entertainers, Wendi Hunter replied that the request came from Council.

Mr. Steve Shields asked how the licensing would be policed and James Bisson responded it would be enforced by complaint.

Wendi Hunter outlined the next steps as follows:

- Staff will report to Committee of Council in June 2013;
- Report will include input gathered tonight and from written comments received from stakeholders and the public;
- If Council decides to continue with a licensing scheme, a schedule will be written to be included in a comprehensive Business Licensing By-law to be presented to Council in the fall of 2013.

The meeting adjourned at 8:20 pm.

IS-1-24

Appendix C

Public Input Licensing of Children's Entertainers

From: Glenn McFarlane

Hi,

I'm sorry that I cannot attend the May 22nd meeting. Many thanks for the opportunity to comment on the issue outside the meeting.

While I appreciate that the intent of this proposed bylaw is to protect children, I don't believe this to be the most pragmatic approach to the problem.

As a presenter who regularly books children's entertainers, I have never had any problems with any entertainer in my over 20 years of booking. For one thing, most entertainers are already police checked on their own accord, they don't need a bylaw to make it mandatory.

Secondly, children's entertainers show up for a gig only as long as necessary, and do not linger before or after the show. They do their show in public, then leave as quickly as possible afterwards. They are never alone with a child.

Thirdly, this issue should not be dealt with at the municipal level. Professional entertainers play all over the province, and it would seriously cut in on the financial viability of their profession if they had to get a license for every town they perform in. This should be dealt with at a provincial issue, or perhaps even federally.

Forthly, it would be very difficult to enforce this bylaw. Many events are held on private property, where it would be difficult for enforcement officers to even know about an event, let alone have access to it. It would also be difficult to define what is and isn't a children's entertainer. For example, is a mascot (such as Ronald MacDonald) a children's entertainer? Is a musician? Is one of Santa's elves?

On a side note, if you are concerned about the safety of children, you should be more worried about people of authority who do see children privately, such as teachers, religious figureheads, or even the child's estranged uncle. If you want to take the issue to extremes, the people who spend the most amount of time alone with children are the parents themselves. Having sat on a jury for incest, I am only too aware of what some parents may do to a child.

With all due respect, I don't think this is the sort of issue that city council should be spending your time (and our tax dollars) on. I like to think you have more important issues to address, to help improve our great city.

Sincerely, Glenn McFarlane

IS-1-25

From: DAVID LEW
Sent: 2013/05/22 12:57 PM
To: Hunter, Wendi
Subject: Brampton Child Entertainer By-law Meeting - May 22

Mayor and Members of Council. Unfortunately due to my car breaking down, I am unable to attend today's meeting.

I have been a professional children's entertainer for 26 years as a clown, magician and musician. I'm also a father of 4.

The idea of having children's entertainers licensed is a ridiculous one. Abuse by an entertainer is very, very rare. In comparison, there are thousands of children that are abused by their own parents or other family members. Are we going to start to have potential parents get a police check and a license in order to have children? What about their other family members? Are they going to need a police check and license before they see their new grandchild, niece, nephew or cousin? Will the neighbors need a police check and license in order to see the new child next door? After all unknown to you they may be a child molester from years ago.

Members of Toronto Clown Alley and any other good professional entertainers already have police checks and carry liability insurance. By the way one thing that you should know about Toronto Clown Alley is that in it's long history (27 years) there are only 2 people that were asked to leave the organization due to lack of ethics. Linda Beaudoin is one of them. This is not a slanderous remark. It is a fact that has happened.

Paying for a license to the city won't protect anyone. Common sense will. When a performer is brought into your house, you're essentially inviting a stranger into your house. The onus is on the parent to make sure that the children are never left alone with a stranger. It's one of the first things we as parents teach our kids. Beware of strangers. In fact I always insist that at least one adult has to be in the room where I'm entertaining.

This is a law that also can't be enforced. Unfortunately anyone can throw on a clown suit to entertain children. Costumes can be rented easily. They can be bought easily. It happens all the time, especially at corporate events where employees are asked to dress up as clowns or as elves for the children. How do you propose to enforce something like that?

At public events we are always swarmed by kids and adults. There is no chance for abuse at such an event.

There are many different professions that work with children. Doctors, coaches, scout leaders, boys and girls groups, after school activities, home day care workers, etc. Will they all need to pay a license? Would you send your 5 year old child in to see the doctor on his/her own? Of course not. Why then would you leave your child alone with an entertainer?

What is needed is not for entertainers to be licensed but rather for parents to be educated.

Dave D Jay's Family Entertainment

IS-1-26

From: JOHN HAYES
Sent: 2013/05/22 10:17 PM
To: Hunter, Wendi
Subject: Licencing Children'n Entertainers.

Once again, the Councillors of Brampton will become the Butt of Jokes on Talk Radio in Toronto.

The message from too many in the Chambers this evening seems to be, "if you are opposed to licencing you are in favour of Child abuse".

Because of my involvement with the Santa Claus Parade I have been exposed to the 'Lobbying' of several of the people.

I fail to see how a Licence would prevent a Children's Entertainer, in another Country, from stabbing to death a Child.

I am sympathetic to the fact that some of the Speakers were "abused" as Children, but fail to appreciate how licencing others will compensate for what happened in the past.

My concerns are as follows:

1. Who will be Licensed? We need to be very careful about our Definitions!
2. How can this be policed?
3. How many Staff will be required to set up, operate and enforce this By-Law?
4. At what cost?
5. Is there anybody who can give us some assurance that this will prevent one Child from being "molested"?
6. Perhaps what is needed is an Advertising Campaign Promoting Parents to demand a current copy of a Police Check from anybody associated with their children.
7. A push through existing Government Bodies {eg; Provincial and/or Federal Governments} to insist on Police Checks for all of the appropriate People.
8. The City should Lead by promoting the concept as opposed to passing another unenforceable By-Law.

John J. Hayes

IS-1-27

From: William and Janet Wright

Our children, grandchildren, and great-grandchildren are exceedingly precious. The licensing of clowns and other entertainers is a small price to pay for their protection.

All qualified people of important status, be it a teacher, an electrician, or a mortician, are licensed to do their work. The licensing of a professional, working-for-remuneration entertainer should be regarded as an enhancement of their professional status, and possibly add to their financial gain. We therefore support the licensing of these people.

IS-1-28

From: Linde Weedman
Sent: 2013/05/22 1:13 PM
To: Hunter, Wendi
Subject: By-law - Children's Entertainers

Good day Brampton City Council Members,

I would like to express 2-main views on behalf of my colleagues, friends and myself ...

(1) we believe licensing for 'child entertainers' is a good idea, however making 'child entertainers' the main target is negligent and discriminatory ... ALL 'child entertainment-related' service providers should also be included (for example: carnival workers, ride attendants, food handlers, set-up & clean-up crews, talent agencies, event venue facility staff, as well as anyone working on-site at any event, etc, etc)

(2) licensing should be unified at least by province, or better yet Canada-wide ... one license requirement with annual renewal is requested

Thank you for taking these main points of concern into consideration.

Sincerely,

Linde Weedman

**Please note that Toronto Clown Alley has an Insurance Provider for Members and to qualify members must provide a current Police Check
... <http://www.torontoclownalley.com>**

--
Linde Weedman

President & Membership - Toronto Clown Alley

IS-1-29

From: Robert Enns

I cannot see the point of licensing children's entertainers other than to produce a bit of money for the town which gets taken from folks probably struggling to make living as clowns etc.

The woman who started all this nonsense apparently thinks children's entertainers might be pedophiles and a danger to those children in attendance at events. I ask you, at what such events are these people left alone with a child? Pedophiles either kidnap children or develop a relationship over time with the victims. They are not entertaining children at parties.

This is just a cash grab with no real justification and certainly has nothing to do with the safety of children.

15-1-30

From: Kathy Kerr
Sent: 2013/05/21 9:42 AM
Subject: Licensing of Children's Entertainers

Dear Councillor Moore, Councillor Gibson and Ms. Hunter:

I would like to take this opportunity to provide input on the proposal currently before Council to establish a business licensing system for children's entertainers in Brampton.

By way of introduction, I am a lifelong resident of Brampton (Ward 5) and have been a professional children's entertainer for over 20 years. I am also employed with the Ministry of Community Safety and Correctional Services and for over 26 years, my career has focused on promoting public safety throughout the province.

I would like to commend Ms. Hunter for the very thorough report presented to Council on February 20, 2013. I concur with the recommendation that the City of Brampton **not** license children's entertainers and wholeheartedly agree with the conclusion that, "challenges in defining scope, the Vulnerable Sector Check process and enforcement of a licensing system would render the system ineffective and challenging to implement, not to mention exposing the Corporation to liability risks."

I also believe that the focus on licensing children's entertainers is somewhat misleading in that statistics indicate that "the majority of child and youth victims know the offender. In 2011, 89% of child and youth victims of sexual assault were victimized by somebody other than a stranger." (source: http://www.justice.gc.ca/eng/news-nouv/nr-cp/2013/doc_32845.html) Focusing on children's entertainers (i.e. "strangers") would perpetuate the myth of "stranger danger" and overlook the fact that most perpetrators of violence/abuse of children are family members, friends or acquaintances.

The safety of our children is everybody's responsibility; a license does not guarantee safety and may promote a false sense of security. The logistical, administrative and enforcement implications of licensing (as noted on p. 5 of the staff report) are significant; a by-law without any "clout" is simply not effective and may in fact be counter-productive to the intended goal.

Public education for parents, caregivers, event organizers and in particular children, continues to be our strongest and most effective tool towards preventing violence and abuse against children. Education for entertainers would also be an effective mechanism for sharing concerns about interacting with vulnerable populations.

I believe there are effective and creative ways that we – entertainers, politicians, and the general public – can promote safety for children within our community.

As you can see, I take my "funny business" very seriously. I would look forward to participating further in any task forces or committees that may be struck in order to amicably address the concerns of council about the safety of services provided by children's entertainers in Brampton.

Sincerely, Kathy Kerr, a.k.a "Kookie" the Clown

IS-1-31

From: deyanne holmes
Sent: 2013/05/22 2:00 PM
To: Hunter, Wendi
Subject: re: Child Entertainer By-Law meeting

Attention Wendi Hunter:

I am writing you regarding the forthcoming meeting concerning the Child Entertainer By-Law meeting because I am unable to attend in person.

Recently in the news, there have been various reports of children having been sexually abused by adults. Unfortunately, there is nothing new about these revelations as it happens all the time.

What is noteworthy about the perpetrators is that they come from all segments of society, namely coaches, teachers, relatives of the victims and shockingly, even DOCTORS!

It's curious to me why the person who is pushing this agenda is focusing her attention on clowns as sexual abuse would typically take place in private and clowns entertainers, balloon artists and facepainters are out in the open in full view of everyone.

We are all familiar with the famous case of John Wayne Gacey who worked as a clown but he did not lure his victims while dressed as a clown.

He was a handyman/renovator who lured his victims with the promise of employment.

Should the city of Brampton proceed with this proposal, how would the by-law affect the hiring of entertainers who reside elsewhere? How practical would it be to enforce the by-law?

In my opinion, this by-law would be an unworkable, impractical, awkward and unnecessary bureaucratic nightmare to enforce.

It would make more sense to fingerprint the entire population of Ontario and feed the results into a provincial database.

The bottom line is that this proposal will do nothing to protect children.

I find it difficult to respect a suggestion that will do nothing to solve a problem while creating unneeded expense and aggravation for those of us who earn a meagre income doing what we love.

Respectfully,

Deyanne Holmes
Facepainter

From: Graham Chalk

Question 1

Was council backed into this position because to dismiss the proposal would suggest that they are "against protecting children". This is a weak argument and or rationalization to move forward. the reality of not being able to implement an enforceable bylaw, points to the absurdity of the whole discussion, as pointed out by your own resources

- 1) enforcement officers wont know when/where a party will take place
- 2) enforcement officers will not be able to gain admittance to private property
- 3) when you take a picture of the performer, will it be in makeup or not. either way you will not be able to identify the individual should the case progress to a court challenge. Im sure you legal team has already pointed this out
- 4) Which VSS check is acceptable...why is peel any better than metro toronto

2) Question 2

The onus for safety of children should be on the PARENT, not the govt and certainly NOT the municipal government.

Question 3 - who should be included?

will you include all individuals that meet/interact with children? There are certainly many more high risk/ multiple interaction/ less public interaction than clowns in a 60 min show

Category 1 - Higher Risk

- Teenage Babysitters > Much higher rate of assault than clowns
- Unlicenced Daycare
- Backyard Swimming instructors
- Music Teachers in a closed music room of a retail location like Long& McQuade, or a private home
- Dance teachers
- gymnastics teachers

Category 2 - intermitent child interaction

- Librarians
- Icecream Trucks
- Caretaker Staff
- retail store clerks where there are changerooms

the slippery slope clearly demonstrates the futility of your good intentions

4) Required vs Reccommended

lets be honest, no company insitutes VSS as a child protection measure. The city like everyone else added VSS based on the liability issues and the advise of their legal team. If something happened and there was no VSS, then there was a liability issue. With VSS and an incident the employer can claim no prior knowledge

From: Sarah Parrish (9 pages)

Here is a policy piece that I just put together around some of the things we have been discussing regarding **occupation regulation in Ontario**.

I have included a **summary of argument** on the first page, followed by definitions of terms related to regulated licensing in Ontario and how regulated bodies function.

All of this information was found on both the federal and provincial websites.

I have also included a summary of child-care licensing law in Ontario.

Of note is also the National Classification of Occupations which includes "Clowns."

I also included the list of occupations requiring a Working With Children check provided by the Victoria State, Australia who has implemented a broadly based occupational WWC check program at the State level.

I have compiled this in DRAFT FORM ONLY.

Canadian Law and Regulated Professions

Compiled by: Marigold the Clown aka Sarah L. Parrish BA, BEd , MA

March 12, 2013

The information provided below has been compiled for educational purposes regarding the controversial attempt by Brampton City Counsel to legislate an Occupational License to work in the municipality as a Children's Entertainer or "Clown."

The following information was obtained through both Government of Canada and Ontario Government websites, links/citations included.

It is the argument of many Clowns currently working in the GTA, Brampton and surrounding area that such legislation that acts to regulate occupations such as Clowns does so at the provincial level, it is argued that this is not the jurisdiction of the municipality.

An attempt to administer such an undertaking merely at the municipal level, by one municipality does not act in the favour of protecting children—policy that is not implemented effectively does not help, but hinder. Occupational classification and regulation is the jurisdiction of the province not the municipality.

The need for people (including Clowns) working with children and vulnerable people, such as those with disabilities or seniors to undergo Vulnerable Sector checks is not in question.

What is in question is this attempt to finger point and isolate one specific occupation (on no legal grounds), rather than mandating a much broader approach to ensure Vulnerable Sector screening for all occupations that deal with children, and ensure that children and vulnerable people are truly protected and that one occupation is not discriminated against.

The fact is that not all occupations that have access to children and vulnerable people are currently regulated. And those that are regulated adhere to the rules and regulations of a properly administered regulatory body. A list of those occupations that are regulated in Ontario is attached within the information provided below.

Working in Canada: Who needs a license and who regulates that license?

Regulated Professions that Require a License

- The regulation of occupations that require a license is administered by a provincial regulatory body
- The right to require a license or law that mandates a police check is administered by the regulatory body that administers the qualifications of the specific occupation

Information found on:

<http://www.workingincanada.gc.ca/content_pieces-eng.do?cid=24#Working_Conditions>

Regulated Professions

A type of regulated occupation such as physicians, nurses, and lawyers. Regulated professions usually require several years of university or college education, practical experience under the supervision of a licensed worker in the chosen profession, and the successful completion of a licensure examination. It is important to note that provinces and territories sometimes expect different things from their regulated professionals. In some instances, this means that a person licensed in one province may have to re-apply for a licence in order to work in another province or territory.

Regulatory Body

A regulatory body is an organization that sets the standards and practices of a regulated occupation. They are responsible for the issuing of a licence.

Regulated Occupations

Occupations that set their own standards and that require workers to have a licence to practice. About 20 per cent

of jobs in Canada are regulated occupations. These include regulated professions (e.g. nurses) and skilled trades (e.g. plumbers).

Within each province and territory, a regulatory body exists for each regulated occupation. Most regulatory bodies have their own Web sites that describe their licensing requirements including information on eligibility requirements, foreign credential recognition, and registration fees.

About 20 per cent of jobs in Canada require you to have a licence before you can begin work for public safety reasons. Jobs that require a licence are called regulated occupations. Regulated occupations include nurses, doctors, engineers, teachers, accountants and electricians. You need special education and experience before you can get your licence to work in most regulated occupations. Generally, two main types of occupations are regulated in Canada:

- Regulated professions (for example, doctors, nurses and lawyers); and
- Apprenticeable (Skilled) trades (for example, plumbers and electricians).

In order to work in a regulated occupation, you usually need to have:

- taken a university or college program;
- completed practical (hands-on) experience under the supervision of licensed workers in the occupation; and
- passed examinations.

Within each province and territory, a regulatory body exists for each regulated occupation. A regulatory body is a non-governmental organization that regulates an occupation for the government. Most regulatory bodies have their own Web sites that describe their licensing requirements including information on eligibility requirements, foreign credential recognition, and registration fees.

Non-Regulated Occupations

Non-regulated jobs do not require Definition of licence.

Non-regulated jobs range from those that require years of education and training—such as computer analysts or biologists—to those that require little formal training—such as food and beverage servers or housekeepers. Non-regulated jobs range from entry level to management level.

License

The word "license" is a verb and means the same as "to accredit" and "to certify".

The word "licence" is a noun. A licence is a document used by some trades and professions to signify that the licence-holder meets competency and other requirements and is entitled to practice. If you wish to work in a regulated occupation, you will need a licence to practice. In some occupations, licensing is voluntary.

Ontario Licensed Professions:

<http://www.fairnesscommissioner.ca/index_en.php?page=professions/index>

- The occupations that require regulations are required to work with the Fairness Commissioner who oversees that the provincial regulatory bodies are acting fairly.

Office of the Fairness Commissioner

The Office of the Fairness Commissioner is an independent agency of the government of Ontario. Our goal is to make sure that people are treated fairly when they apply to become licensed professionals in one of Ontario's regulated professions, no matter where they were trained. This goal is widely supported in Ontario, and reflects the principles and core values of the people of this province.

Getting licensed to work in your profession or trade in Ontario:

In Ontario, some professions set their own standards of practice. These are known as regulated professions. Regulated professions make sure that their members meet specified standards of practice. They have the authority to:

- o set entry and training requirements
- o set standards of practice
- o assess qualifications and credentials
- o register qualified applicants, and
- o discipline members.

To enter a regulated profession, apply to the organization responsible for regulating that profession (the regulatory body). The regulatory body will assess your qualifications and, if you qualify, will license, register, or certify you to practise your profession in Ontario. If you do not qualify, you have to take steps to meet the licensing requirements. A list of regulatory bodies in Ontario follows this text.

The assessment of your qualifications by the appropriate regulatory body takes time and costs money. It is important for you to understand the process before you begin. This will help you decide if and when you should apply to the regulatory body for registration.

In some professions, it is illegal to work or use the title of the profession if you are not registered with the regulatory body. In other professions, you can do the work of the profession, but you must register with the regulatory body if you want to use the title of the profession.

Some professions are not regulated by law, but may have voluntary professional bodies. Some voluntary bodies provide certification courses and registration which may be valuable to get work in your profession. Membership in these professional bodies is not mandatory.

Regulated Professions and Regulatory Bodies in Ontario

Currently 14 non-health professions are covered by the Fair Access to Regulated Professions Act, 2006, and 26 health professions are covered by the Regulated Health Professions Act, 1991, as amended.

Ontario Association of ARCHITECTS

College of AUDIOLOGISTS AND SPEECH-LANGUAGE PATHOLOGISTS of Ontario

Institute of CHARTERED ACCOUNTANTS of Ontario

College of CHIROPODISTS of Ontario

College of CHIROPRACTORS of Ontario

College of DENTAL HYGIENISTS of Ontario

Royal College of DENTAL SURGEONS of Ontario

College of DENTAL TECHNOLOGISTS of Ontario

College of DENTURISTS of Ontario

College of DIETITIANS of Ontario
College of EARLY CHILDHOOD EDUCATORS
Ontario Association of Certified ENGINEERING TECHNICIANS AND TECHNOLOGISTS
Professional ENGINEERS Ontario
Ontario Professional FORESTERS Association
Certified GENERAL ACCOUNTANTS of Ontario
Association of Professional GEOSCIENTISTS of Ontario
College of HOMEOPATHS of Ontario
College of KINESIOLOGISTS of Ontario
Association of Ontario LAND SURVEYORS
LAW Society of Upper Canada
Certified MANAGEMENT ACCOUNTANTS of Ontario
College of MASSAGE THERAPISTS of Ontario
College of MEDICAL LABORATORY TECHNOLOGISTS of Ontario
College of MEDICAL RADIATION TECHNOLOGISTS of Ontario
College of MIDWIVES of Ontario
College of NATUROPATHS of Ontario
College of NURSES of Ontario
College of OCCUPATIONAL THERAPISTS of Ontario
College of OPTICIANS of Ontario
College of OPTOMETRISTS of Ontario
Ontario College of PHARMACISTS
College of PHYSICIANS AND SURGEONS of Ontario
College of PHYSIOTHERAPISTS of Ontario
College of PSYCHOLOGISTS of Ontario
College of Registered PSYCHOTHERAPISTS and Registered Mental Health Therapists of Ontario
College of RESPIRATORY THERAPISTS of Ontario
Ontario College of SOCIAL WORKERS AND SOCIAL SERVICE WORKERS
Ontario College of TEACHERS
College of TRADITIONAL CHINESE MEDICINE PRACTITIONERS AND ACUPUNCTURISTS of Ontario
Ontario College of VETERINARIANS of Ontario

Regulated Child-care in Ontario

I would also like to address one issue that is being misrepresented as a municipally regulated/licensed occupation: Child-care.

Contrary to popular belief, childcare in Ontario is not strictly regulated. There are no municipal licenses for child-care services. There is a statistic as of 2008 that 17% of children in Ontario are not being provided with regulated/licensed child-care. This is a huge provincial issue.

Here is the law on providing Child-care in Ontario:

Ministry of Children and Youth Services, The *Day Nurseries Act* and Ontario Regulation 262

The *Day Nurseries Act* requires any premise that receives more than five children under the age of 10 years, not of common parentage (children who have different parents), for temporary care and guidance, to be licensed as a day nursery.

A person may provide informal child care to five children or less under the age of 10 years who are not of common parentage (children who have different parents), in addition to his/her own children, without a licence.

The *Day Nurseries Act* is available on the ministry's website at:
http://www.e-laws.gov.on.ca/html/statutes/english/elaws_statutes_90d02_e.htm.

Children's Entertainer "Clown" (Non-Regulated)

- Currently there is no legislation that regulates clowns and there is no regulatory body that voluntarily regulates the occupation
- The occupation is however, classified under the National Occupational Classification
- If this position was to be regulated provincially there will need to be a regulatory body determined in order to properly and fairly administer the regulation of the occupational licensing requirements to work in Ontario.

Information on Occupational Classification from:

Human Resources and Skills Development Canada <www.hrsdc.gc.ca>

National Occupational Classification

The NOC 2006 is the authoritative resource on occupational information in Canada. It is used daily by thousands of people to understand the jobs found throughout Canada's labour market.

<<http://www30.hrsdc.gc.ca/NOC/English/NOC/2006/ProfileAlphabetic.aspx?val=5&val1=5232&val10=C>>

"Clown"

Unit Group

5232 Other Performers

This unit group includes circus performers, magicians, models, puppeteers and other performers not elsewhere classified. They are employed by circuses, nightclubs, theatre, advertising and other production companies or may be self-employed.

Example Titles

acrobat
 busker
 circus performer
 clown
 fashion model
 magician
 puppeteer
 ventriloquist

Main duties

The following is a summary of main duties for some occupations in this unit group:

- Buskers entertain passers-by on sidewalks and in parks with magic tricks, juggling acts, short dramatic works, music and other entertaining displays.
- Circus performers such as trapeze artists, high-wire walkers, clowns and jugglers entertain audiences with thrilling and humorous acts.
- Magicians and illusionists perform sleight-of-hand tricks, disappearing acts and other illusions.
- Fashion models display clothing and merchandise in commercials, advertisements and fashion shows and pose for artists and photographers.
- Puppeteers operate puppets and marionettes.

Employment requirements

- Circus performers and acrobats may require a period of study at a circus school.
- Completion of modelling courses is usually required for models.
- Training for other occupations in this unit group is often obtained under the guidance of a practitioner.
- Talent and ability, as demonstrated during an audition, are important hiring criteria.
- Membership in a guild or union related to the occupation or type or performance may be required.

Classified elsewhere

Actors and Comedians (5135)

Dancers (5134)

Musicians and Singers (5133)

Professions in Ontario that should require Regulations (that deal with children)

- Only the highlighted are currently licensed in Ontario
- This list was created by the Victoria State of Australia who is leader in legislating WWC (Work with Children) licenses.

Type of work	Details
Camps	All overnight camps for children
Child Care Services	Child care services including: <ul style="list-style-type: none"> - centre based long day care - occasional care - family day care - in home care - outside school hours care
Childminding	Babysitting or childminding services arranged by a commercial agency

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Child Protection Services	Child Protection Services
Children's Services	Children's services including kindergartens or preschools
Clubs & Associations	Clubs, associations or movements of a cultural, recreational or sporting nature
Coaching & Tuition	Coaching or tuition services of any kind for children
Counselling Services	Counselling or other support services for children
Educational Institutions	<p>Educational institutions for children, specifically:</p> <ul style="list-style-type: none"> - Public Schools (including all primary, secondary, technical and special schools) - Non-Government schools (including all primary, secondary and special non-Government schools) - Divisions of universities/colleges - Other institutions providing children's study or training programs
Entertainment & Party Services	<p>Commercial entertainment or party services for children unless they are merely incidental to or in support of other business activities</p> <p>Children's Entertainers</p>
Foster Care	Fostering Children
Gym or Play Facilities	Commercial gym or play facilities for children unless they are merely incidental to or in support of other business activities
Photography Services	Commercial photography services for children unless they are merely incidental to or in support of other business activities
Religion	Religious organizations

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School Crossings	School crossing services
Talent & Beauty Competitions	Commercial talent or beauty competitions for children unless they are merely incidental to or in support of other business activities
Youth Justice	<p>Youth Justice places or services including:</p> <ul style="list-style-type: none">- remand centres- youth residential centres- youth supervision units- youth training centres- probation services

From: Bev & Ian Brown

May 22, 2013

Having children's entertainers pay a license fee will do nothing to protect children but create more paperwork for the city, line their pocket and reduce the low income children's entertainers make now that have no benefits, plus if you are full time paying hst with most of your competitors not charging hst reducing our income even further.

Children's entertainers are always swarmed by kids and parents where ever they work. Home daycare workers have every opportunity to abuse children and they don't need a license yet we are targeted. There are lots of other jobs where adults are alone with kids and they are not targeted.

Did you consult with your bylaw dept. on what staff you would need to enforce the license for children's entertainers? What will it cost? Will you need more staff? etc..etc..In the city I'm from which many people think the city is run really well bylaw can't enforce the issues they have. From personal experience they couldn't enforce a car business in a backyard in a residential area with photographs of the garage inside, license plates of cars fixed, tow trucks etc..etc.. It took almost 2 years to get someone else to clean their backyard to a respectable state. Forget it when you have neighbours with dogs barking 24/7. It is unrealistic for a city to run after every clown for a license.

Parents &/or who ever is holding the party needs to be responsible for the children in their care. We are not babysitters. We insist one parent be in the room at all times. We need protection from allegations children may make about us that are untrue. Parents should be publicly informed to have one adult present at all times where the entertainer is performing.

I understand one of the accused entertainers Lynda brought up had a police check at the time of being a member of a clown organization but at the time had no record. Even having a police check doesn't mean a person has not committed or will not commit a crime.

You could dig of photos and info about people who have abused kids in any job field from around the world. Why target only children entertainers.

It's ridiculous to have every city target us.

We are all about caring for the safety of children. We have police checks already and are insured. It makes no sense for a person who has abused a child to get a police check which makes the procedure null and void of any benefit to anyone.

Entertainers will boycott Brampton for enforcing this extra fee to them that has no benefit to anyone but the city.

If police checks are what people feel is the safest way to protect children there should be one registry for our province. We should be provided with a paper as proof and anyone should be

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able to phone in to be sure our name is on the list as being police checked. Even with that no doubt people will make up false documents.

The best safe guard is for parents and adults holding parties to be responsible adults and be present watching their children.

Lynda should get a job for the Office of the Provincial Advocate for Children do really do some good rather than target us because of her personal experiences.

Yours Sincerely,

Bev Brown Ian Brown

Bev & Ian Brown

Clowns at Party California