

IMPROVING RURAL EDUCATION

**AN EDUCATION PROJECT FUNDED BY
THE UNITED COUNTIES OF STORMONT, DUNDAS & GLENGARRY
ONTARIO, CANADA**



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October 1, 2021

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ABSTRACT

The migration of people from rural communities to urban centres has been a global trend since the middle of the 20th century. Rural agricultural regions have faced limited growth and development, resulting in steadily declining school enrollment for over 40 years due, in part, to families having fewer children, overall declining birth rates in the Canadian population and resident mobility in search of employment.

Declining school enrollment is evidenced by school closures, school board amalgamations and student transportation to schools further away from a student's place of residence. More recently, the restructuring of educational service provision, programs and student support services and the emergence of online and virtual platforms as a means to access education during the global COVID19 pandemic have given rise to new meanings for school, education and community.

This report investigates the challenges and opportunities for educational planning in the present and into the future, by all stakeholders who benefit from quality public education services offered to students regardless of their place of residence within the province of Ontario, or by extension, any province in Canada. Strategies include local, provincial and federal initiatives and funding related options which can be engaged to prevent rural schools from closing.

If the expression "It takes a village to raise a child" is applied to education, then all entities including municipalities, non-profit organizations, service clubs, health institutions and businesses all have a voice and a role in the development and promotion of education in their region.

The results and recommendations in this report are intended for rural county councils to develop new educational initiatives within regional government, provincial government recognition of required support to students with a lens on equity in funding programs and services to increase best practices at school boards, and for local, provincial, national and international cooperation to enhance educational opportunities for all students.

BACKGROUND

The United Counties of Stormont, Dundas and Glengarry ("SDG") in Ontario, Canada has a population of 66, 000 distributed over six rural municipalities. The elected body of County Council, issued a call for proposals for an education improvement project titled *Improving Rural Education in Stormont, Dundas and Glengarry* counties on February 5, 2021. (**Appendix 1**)

The education project was one of five key priorities identified in the Council's strategic plan 2019-2022 under the heading *Rural Schools- Educating Children in Their Communities*, in alignment with the guiding principles of: "*Our residents are our first priority, no municipality gets left behind, partnerships as essential for our success and our environmental legacy is important*". These principles are encompassed under a Mission "*to create better communities*" and a Vision "*to be a progressive regional government*". "*The County is committed to working with the province, local school boards, parents and other stakeholders to develop strategies that maintain the vibrancy of our rural schools*".¹ (**Appendix 2**)

Horizon Educational Consulting was selected as the candidate agency to fulfill the project's mandate and objectives and an agreement was signed on March 18, 2021. The duration of the project was four months from April 1, 2021 to July 30, 2021.

INTRODUCTION

Canada remains only one of a handful of countries in the world with no national education framework. Based on the constitutional right of public (sectarian) and Catholic education systems to exist since 1867 when Canada officially became a country in its own right, the shift from religious authorities overseeing schools before and after 1867 to provincial government oversight was the first major shift in the educational landscape.

The second shift occurred with the recognition of self-determining governance of French language schools provincially. In the province of Ontario, the restructuring of school boards in 1997² and the creation of four publicly funded school systems (English Public, English Catholic, French Public, French Catholic) has led to a continuous shift in education demographics over the last twenty years.

Indigenous students remain under federal jurisdiction for education as opposed to provincial jurisdiction. Changes to aboriginal self-determination and control over education are evolving, as these existed only on designated reserves. However, many indigenous students still go off reserve to pursue secondary (high school) education and to access programs and opportunities in the public education system which are not available in on-reserve schools. Ontario's Indigenous Education Strategy³ aims to improve equitable access to education and educational outcomes for First Nation, Inuit and Métis students.

School board funding also underwent a major shift from municipal governments overseeing taxation rates related to education at a local level, to a process shifting it to provincial jurisdiction and centralized funding processes.

The dynamic of a four- school board system operating within a region of low population growth has created more competition for students. Aggressive public and social media marketing campaigns have been employed by some school boards to attract parents and students.

The increased interest for choice in schooling options by more involved parents and adolescent students choosing programs of interest with peers offered in different schools are also factors in the development of new solutions.

New data is required to measure the impact of these changes to inform new strategies, create new initiatives and opportunities for students; to demand compliance to existing policy, legislation and service standards for public education to maintain equity and to create new policies and changes to existing legislation where none exist, to enhance the delivery of educational programs and services.

The premise of community ownership of schools by citizens and taxpayers is also a new perspective which presumes school boards to be stewards of the schools in their operational structures but partners with the community and businesses to ensure the vitality and maintenance of each school in the context of the social fabric of each rural community.

Declining enrollment in the school system in Ontario has been a characteristic trend since the mid 20th century due to Canadian families having fewer children⁴. Canada is a country with a consistently declining birth rate which is the reason why the country relies heavily on immigration to sustain economic growth and the stability of health, education and social services. While immigration remains a federal responsibility, provincial and municipal governments can access funding from federal initiatives and programs to support local communities.

STATEMENT ON CONSULTANT'S INTELLECTUAL PROPERTY

The ideas, solutions, options, strategies and recommendations in this report are strictly the intellectual property of this consultant and may not be used without permission and proper source citing to this report to maintain integrity to the original concept and the articulation of these ideas. Any other idea proposed which is not original to this Consultant is credited within the endnotes of the report.

ACKNOWLEDGEMENT OF INDIGENOUS TERRITORIES

The field work undertaken to complete this study included the traditional territory of the Haudenosaunee (Iroquois), Mohawk, Haudenosaunee (St. Lawrence Iroquois) and Huron-Wendat⁵. This territory is covered by the Upper Canada Treaties. This report honours the people and their valuable past and present contributions to this land.

DEFINITIONS

Defining urban and rural areas and understanding geographical context is essential when speaking to issues related to access to education, quality education, educational opportunity and transportation.

Statistics Canada revised its definition of urban and rural designations in a new departmental standard which became effective in January 2017:

The Population Centre and Rural Area Classification 2016 provides standard names and codes for Canada's population centres (POPCTRs) and rural area (RA). A classification variant provides the standard names and codes for POPCTRs and RA by province and territory.

...The term 'population centre' replaced the term 'urban area'. A population centre was defined as an area with a population of at least 1,000 and a density of 400 or more people per square kilometre. All areas outside population centres continued to be defined as rural area.

Secondly, population centres were divided into three groups based on the size of their population to reflect the existence of an urban-rural continuum:

- *small population centres, with a population of between 1,000 and 29,999*
- *medium population centres, with a population of between 30,000 and 99,999*
- *large urban population centres, consisting of a population of 100,000 and over.*

While other classifications were possible, the intent of this set was to provide users with a basic starting point to better understand the dynamic landscape of Canada.

Users of the former urban area concept are still able to continue with their longitudinal analysis using population centres.

These changes were meant to improve interpretation of Statistics Canada data and help users in the study of the Canadian urban-rural landscape and its issues.

In 2016, two new criteria were added to the delineation rules for population centres: the use of a secondary population density threshold as well as employment density.⁶

When applying these standards to communities within the six municipalities, only one community meets criteria for a medium population centre (Cornwall: 47,000). All others are considered small population centres.

Access to education is the ability of a student to attend a physical school building or other virtual learning environment, obtain instructional and assessment services, obtain support services related to learning and enter into a reciprocal engagement of teaching and personal feedback on learning from an accredited* teacher in Ontario, whether this access is through in person instruction, remote synchronous contact (teacher and student can communicate in real time with video chat or via phone) or asynchronous online contact (teacher and student communicate in writing).

Quality education must incorporate the following factors:

- students being taught by accredited teachers in Ontario, having the proper qualification to teach in the appropriate division (primary, junior, intermediate and senior)
- teachers having sufficient training to meet the needs of a student within their role and area of responsibility
- teachers having expertise and experience in their subject matter to enhance the quality of the pedagogical service offered to students
- additional qualifications and professional development undertaken by the teacher to offer additional knowledge to students in a subject matter or skill set defines high quality
- teachers offering students educational opportunities which extend beyond the instructional core curriculum and designated learning setting (classroom, lab, school) to further internalize the learning and mastery of the subject, skills, concept or knowledge for the student.
- Teachers who exemplify the standards and ethics of the profession and engage in a continuous professional learning framework as articulated by the Ontario College of Teachers (the regulatory body of the teaching profession in the province of Ontario)⁷.

**Every teacher employed by a publicly funded school board employer in Ontario must be licensed to teach by the Ontario College of Teachers, the regulatory body of the teaching profession in Ontario, with their name and qualifications appearing on the public registry at www.oct.ca*

Educational opportunity is any circumstance which offers a qualitative or quantitative measure of learning benefit to a student regardless of age or grade. Examples of such opportunities include extra-curricular activities, clubs, programs, services, field trips, exchanges, community volunteer work, travel, internships, apprenticeships, job shadowing, training, paid work or unpaid co-op placements (student job placements with employers for school learning credit).

Barriers and obstacles

In the context of this study a barrier is defined as a situation over which a parent or group of individuals has no direct control and is difficult to change (for example: policy, legislation, lack of data, type of building construction).

An obstacle is defined as a situation in which there is a lack of initiative, motivation, understanding and/or empathy on behalf of an entity which requires a large amount of advocacy time and energy to overcome by a group of people, but can be more easily changed than a barrier (bias, stereotypes, assumptions, beliefs, fossilized practices).

This report aims to quantify and qualify main barriers in the maintenance of community schools and propose solutions to overcome those barriers with options and best practices that maximize local educational opportunities.

The Ontario Ministry of Education's 2006 *Equity Strategy*⁸ set the following additional expectations of the learning environment for students which will also be referenced in this report:

DIVERSITY: The presence of a wide range of human qualities and attributes within a group, organization, or society. The dimensions of diversity include, but are not limited to, ancestry, culture, ethnicity, gender, gender identity, language, physical and intellectual ability, race, religion, sex, sexual orientation, and socio-economic status.

EQUITY: A condition or state of fair, inclusive, and respectful treatment of all people. Equity does not mean treating people the same without regard for individual differences.

INCLUSIVE EDUCATION: Education that is based on the principles of acceptance and inclusion of all students. Students see themselves reflected in their curriculum, their physical surroundings, and the broader environment, in which diversity is honoured and all individuals are respected. (page 8)

METHODOLOGY

Research

- i. Literature review on rural school closings (provincial, national, international perspectives)
- ii. Media articles related to school closings in Ontario and other Canadian provinces
- iii. Key data & statistics (Statistics Canada Census, Open Source government data, school board data)
- iv. Internet research
- v. Academic portal (Concordia, Western, Ontario Institute for Studies in Education, ResearchGate, Fraser Institute)
- vi. Parent advocacy groups' submissions
- vii. Municipal government and association submissions to the provincial government
- viii. Policy and legislative review of Education sector documents

Interviews with

- ix. SDG Education Working Group members in four meetings and follow-up calls
- x. Parents, educators, community members, academic contacts
- xi. Parent advocacy group contacts
- xii. SDG residents
- xiii. Horizon clients with children attending schools in SDG
- xiv. Local media sources and realtors

Field Study

- xv. Ground study via key routes to school sites (external only due to COVID restrictions)
- xvi. Aerial study to view transportation arteries and population density
- xvii. Contacting school and school board personnel
- xviii. Contacting Ontario Ministry of Education personnel
- xix. Attending English school boards' virtual Community Planning & Partnerships consultation virtual presentation
- xx. Attending virtual professional development conference sessions in education law, human rights and international rights of the child

Data Collection & Analysis

- xxi. Online adult surveys and student surveys disseminated to the communities in SDG
- xxii. Key school board website information
- xxiii. Immigration and tourism information
- xxiv. Analysis of key school board websites for program offerings and policies
- xxv. Analysis of municipalities' individual and collective websites

The mixed quantitative and qualitative method of research resulted in the proposal of ideas, options, solutions and recommendations in this report.

PART 1 – TRENDS AND CHALLENGES

Prior to providing solutions, an environmental scan of existing data must be undertaken to understand trends related to student enrollment in rural areas.

Updated information was collected on the 10-year enrollment trend, capacity, utilization rate and facility condition index for all schools in the United Counties of Stormont, Dundas and Glengarry (SDG) within the four-school board context. This information is in **Appendix 3**.

Identifying challenges and issues raised by Council members, students, parents, grandparents and residents in SDG were provided through the call for proposal and through online survey results conducted from May to August 2021. This information was used to aid in the research and development of solutions, by quantifying and qualifying these issues.

1. The call for proposal listed these challenges:

- a) *Slow population growth*
- b) *Low population density throughout the region*
- c) *Large school boards encompassing most of Eastern Ontario*
- d) *Four school boards competing for students*
- e) *Pupil Accommodation Review Guidelines (PARG) incompatible with rural Ontario realities*
- f) *Shifting school boundaries, facilitating growth in some schools while 'choking off' others*
- g) *Inequitable per pupil funding formulas that create disparities among/between boards/schools*
- h) *Inequitable distribution of programming among schools*
- i) *Inequitable per student transportation funding*
- j) *Provincial and board transportation policies that enable the bussing of students long distances from their home communities*
- k) *Funding formulas for new schools that favour larger facilities and disincentivize boards to share facilities*
- l) *Lack of maintenance of older schools*
- m) *Reluctance of coterminous boards to share facilities*
- n) *Pandemic impacts, specifically remote learning*
- o) *Reluctance of school boards to enter into community use agreements*

It also stated ***“County Council determined that the current educational model with the region is inefficient and does not generally serve children well, taking many of them out of home communities”*** (Appendix 1, page 2).

2. The Community Survey Results in Appendix 7 identified these challenges:

Challenges identified as Obstacles:

- *Same programs, courses not available at all high schools*
- *Large classes, split classes*
- *New start times, busing schedules, adolescents starting earlier than young children*
- *Incorrect facts or data used for school closures*
- *Quality of education /Arts programming and sports opportunities*
- *Mental health support to students*
- *Support to parents and consideration of families' needs*
- *Special education, access to assessments & professionals supporting disabilities*
- *Acknowledgment & consideration of community, educator and parental input*
- *Lack of support staff, quality of French Immersion teaching*
- *Diversity of staff and students*
- *Outdated texts and curriculum (Eurocentric) contributing to sexism and racism*
- *Lack of communication from teachers*
- *Unfair boundaries*
- *Virtual learning*
- *Access to after school activities, field trips, sporting events due to busing cost*
- *Transportation to coop placements*
- *Academic and applied courses in the same class*
- *Perception of rural students headed to vocational work after graduation*

Challenges identified as Barriers:

- *Lack of internet or poor internet,*
- *Threat of school closures or school amalgamations*
- *Water quality*
- *Provincial funding formula*
- *Too many schoolboards*
- *Childcare availability*
- *Teachers' unions*
- *Accessible transit*
- *School ventilation and air quality*
- *Lack of Early Learning Centres*
- *Folding public and Catholic school boards into one school system*

Consultant identified challenges

- i. School program information hard to obtain through school board website searches for parents seeking to relocate
- ii. Lack of diversity in school board leadership
- iii. Lack of data and /or reliable data (one source only- school board data)
- iv. Municipal council members' perception of having a limited role in providing educational input
- v. Internet services -access and signal quality
- vi. Obtaining information directly from school staff and school board personnel
- vii. Student trustees having a restricted role in feedback as key clients of educational services
- viii. School boards' perception of education monopoly over decision-making (transportation, costs, programs, school builds) business focused rather than service focused (bottom line vs client satisfaction)
- ix. Disconnect between regional employment sectors (energy, environment, manufacturing) and duplication of program offerings in Specialist High School Majors; no data on whether school boards are meeting the need for student skills training for sector employment
- x. Lack of school board policy to support decisions which are detrimental to the community (parent-initiated survey input and feedback are ignored)

Rural Schools SWOT Analysis (Strengths, Weaknesses, Opportunities and Threats)

Field study work and interviews were completed to develop the SWOT analysis, which is a tool to facilitate the key elements around which strategies, options and recommendations can be articulated.

They are not intended to be prioritized in the way they are presented in the chart below since these are starting points for planning and follow-up action.

Strengths can be used for encouraging population relocation, while weaknesses are signalled as calls to action.

Threats are areas the Ontario Ministry of Education must address to diminish the threat.

Opportunities are offered as strategies for further solutions.

SWOT Analysis of Rural Schools

Strengths

Green space (forests/ conservation areas)

Outdoor recreation opportunities

Quality of life (low density, close to nature)

Lower housing & property costs

Lower taxes

No visible pollution

Good road infrastructure

Historically significant communities (National Historic sites and provincial heritage plaques)

Less turnover in teaching staff in rural areas because staff live and work in local school catchment areas (more invested in students)

Smaller schools add greater social emotional value to learning (teachers know all students and build rapport over the years)

Opportunities

Tourism to attract population migration

Immigration and refugee populations data and resettlement to increase student population

Economic Immigrants to invest in rural communities

Increasing municipal role in educational opportunities and initiatives

Business sector supporting educational opportunities

Weaknesses

Visibility of school information to the public

School board websites not designed within a public service framework (accessibility, ease of navigation, finding information promptly through the search function, accessing a person when making inquiries)

Limited housing units (rental, sale, temporary)

Lack of data from school boards to support community partnerships and school profile information

Lack of student voice

Conservation areas as key educational settings

Provincially and federally funded initiatives in education not highlighted on school board websites (programs, services, employment)

Initiating collaboration & connections with school boards for student learning opportunities

Threats

Low birth rate, declining enrollment

School board competition for a fixed pool of students (aggressive social media and advertising campaigns by French language school boards)

Inadequate internet infrastructure

Perception of rural schools as low performing and therefore low priority

Lack of EarlyON Child Care Centres

Lack of Ministry oversight of school boards through inspections (inequity with private

COVID pandemic relocations

Exploring alternate data sources from other agencies (child protection, health units, social services, hospitals, youth justice) as they also intersect with school boards

schools which require inspections to operate and public schools which are not inspected but are funded through taxpayers)

Municipalities collect taxes for education but do not share ownership of school buildings which are solely under school board ownership and operations

Parent advocacy efforts are the only means leading to change

Education perceived by school board managers as a business, not as a public service

PART 2 – PROPOSED SOLUTIONS TO IDENTIFIED CHALLENGES

1.a) Slow population growth

Source: 2016 Statistics Census data⁹

b) Low population density throughout the region

Source: 2016 Statistics Census data

Type of challenge: Barrier

Proposed Solutions:

Low birth rate resulting in declining school enrollment

Increase population migration to rural areas through inter-Ministerial collaboration

- International students
- Economic immigrants
- Immigrants & Refugees
- Tourism
- Urban resident relocation post COVID

“Ultimately, declining enrolment contributes to diminishing educational services and resources across the English-language school sector, impacting in particular what small schools can provide.”¹⁰

“It is important to understand the enrolment numbers within the context of a declining school age population, which obviously has an impact on school enrolment. The number of Canadians aged 5 to 17 declined 6.6 percent between 2000 and 2015. Every province except Alberta (growth of 11.6 percent) recorded a decline in their school-aged population over this period.”¹¹

1.c) Large school boards encompassing most of Eastern Ontario

d) Four school boards competing for students

Upper Canada District School Board (UCDSB), Catholic District School Board of Eastern Ontario (CDSBEO), *Conseil scolaire de district catholique de l'Est de l'Ontario*, (French Catholic- CSDCEO) *Conseil des écoles publiques de l'Est de l'Ontario* (French Public- CEPEO)

Type of challenge: Barrier

Legislation enshrined rights (section 23, Charter of Rights and Freedoms for Minority Language Education Rights)

Constitutional right to exist for Catholic school boards (1867) and funding for Catholic school boards in Ontario (*Education Act*);

Constitutional Law legal review required for compliance with United Nations Decision on Discrimination in funding Catholic Schools in Ontario¹⁵

1.e) Pupil Accommodation Review Guidelines (PARG) incompatible with rural Ontario realities

Source: *Fewer School Boards Act, 1997*¹²

Media articles:

<http://www.oneschoolsystem.org/>

Source: examples of advertising and promotion to students and parents to attract students to French language school boards (**Appendix 4**)

Federal government funding protocols: Official Languages in Education Program (OLEP)¹³

*Action Plan for Official Languages 2018-2023*¹⁴

Proposed Solutions to Correct Inequity:

- **Ontario provincial government to table and adopt new legislation to have one publicly funded system for each official language (English/French) to follow the model used in Quebec, New Brunswick, Newfoundland, Prince Edward Island and Nova Scotia; move to partial funding only as an interim measure such as Manitoba and British Columbia until compliance is achieved with United Nations Court decision confirming Canada's discrimination regarding funding of Catholic schools**
- **Ministry of Education memorandum to direct school boards to only inform communities regarding school registration but ban advertising campaign practices with the intent of poaching students from English language boards using taxpayer funds**

Source: *Pupil Accommodation Review Guidelines Ontario Ministry of Education 2016**, (revised 2018)¹⁶

g) Inequitable per pupil funding formulas that create disparities among/between boards/schools

Source: *Ontario Ministry of Education Technical Paper 2021-2022*¹⁷

i) Inequitable per student transportation funding

*****No transportation policies exist at the provincial level to accompany funding, as confirmed by Ministry of Education staff***¹⁸

j) Provincial and board transportation policies that enable the bussing of students over long distances to access schools**

Type of challenge: Barrier

Proposed Solutions:

Lack of accountability framework from the Ministry for school boards to develop equitable transportation policies, public feedback opportunities and consider hardships for families and students in revising policy

- **Ministry of Education to adopt flexible funding formula based on community needs as submitted to school boards and forwarded to the Ministry of Education by parents, community groups and municipalities**
- **Ministry of Education to adopt a Grassroots to Government model of consultation through school boards with Ministry approval of funding directly to municipalities and school boards based on submissions outlining needs**
- **Enshrine transportation as a student right to access education for students in rural areas and adopt transportation policies at the Ministerial level which reflect local realities and ensure transparency and accountability**
- **School boards and the Ministry of Education to respect data and evidence provided by parents, community groups and municipalities to support efficiencies and equity and implement evidence-based efficiencies.**

* A summary of changes made to the 2018 version prepared by the advocacy group Community Schools Alliance is presented below. No further changes are imminent at the time of writing of this report.

- “1. Initial Staff Report to have at least 3 options including status quo instead of “one or more”*
- 2. Initial Staff Report to follow ministry-approved template (under development)*
- 3. Each option in Initial Staff Report to address 4 impacts:*
 - *Student programming*
 - *Student well-being*
 - *School board resources*
 - *Local community*
- 4. “Impact on the local community” to include consideration of local economy if at least one school eligible for RNEF [Rural Northern Education Funding]*
- 5. Minimum number of public meetings increased from 2 to 3*
- 6. Final Staff Report must include secondary school student feedback*
- 7. Extra public meeting within 20 business days if new school closure introduced in Final Staff Report*
- 8. Within 5 days of trustee approval of review, notices sent to Head of affected councils and CAO [County Administrative Officer] with invitation to meeting*
- 9. Minimum time between first and final of 3 or more public meetings increased from 40 to 60 business days*
- 10. Modified review prohibited if one or more schools in review qualify for RNEF*
- 11. New section to describe Administrative Review process and conditions”¹⁹*

1. f) Shifting school boundaries, facilitating growth in some schools while ‘choking off’ others

Source: Open Source enrollment data (2011-2021); Pupil Accommodation Review reports from school boards; parent anecdotal accounts; survey results

h) Inequitable distribution of programming among schools

Source: parent anecdotal accounts, review of school site and program offering via school and school board websites; review of school board policies on transportation and local student transportation consortium information, survey results

j) Provincial and board transportation policies that enable the bussing of students long distances from their home communities

Type of challenge: Obstacle

Proposed Solution: Ministry of Education to draft and provincial government to enact a Student Bill of Rights to access equitable learning opportunities in their own community (similar to a Patient’s Bill of Rights in the Health care sector)

School board decision-making is restricted to one source of data to fit messaging to elected trustees; public and parent input not

used to revise proposals, public delegations to school boards are denied, school board senior administration and elected trustees do not visit school site locations to better understand community challenges prior to report drafting and final decision-making, information disseminated to the public is embedded in school board websites, consultation is information sharing in nature and not authentic reciprocal engagement

Greater choice of schools and programs available in the community for parents and students to choose from in a four- school board context

Parent volunteer and elected officials' capacity cannot keep pace with advocacy needs and the constant demands of monitoring school board activity and reports.

1.k) Funding formulas for new schools that favour larger facilities and disincentivize boards to share facilities

Source: anecdotal accounts, Infrastructure investments by the Ministry of Education, Ministry of Education Facilities Partnership Guideline²⁰

l) Lack of maintenance of older schools

Source: school board School Information Profiles (SIP)²¹ which indicate facility condition index, current capacity and utilization rates

m) Reluctance of coterminous boards to share facilities

Source: Ministry of Education Facilities Partnership Guideline, anecdotal comments

n) Reluctance of school boards to enter into community use agreements

Type of challenge: Obstacle & Barrier

Proposed Solution:

Changing the mindset that education is not a business with a bottom line that requires cost efficiencies (one size fits all and macro economics) but a public service with value for money investment in students and service to clients and the community;

- **Amend legislation to joint ownership and management of schools by municipalities and school boards**
- **School boards to manage operations of schools during school day hours and municipalities to manage school**

organizational mindset and school board identity and brand

The barrier is the ownership of schools by school boards as assets; taxpayer funded assets should have shared responsibility with municipalities

1.n) Pandemic impacts, specifically remote learning

Type of challenge: obstacle

Internet service provision in rural areas
Lack of social interaction necessary for learning for students leading to disengagement from learning

Quality of learning is diminished (contact time with a teacher and minimal support services)

buildings before and after school hours, weekends and holidays

- **Education to be viewed as a public service and not a business and public assets shared with the community as funded by taxpayers**

Source: Toronto Sick Kids' Hospital study on the state of mental health of students during the COVID19 pandemic²²

Proposed Solution:

- **Improving internet access and quality to be under the responsibility of the Ministry of Education incorporated through Ontario Infrastructure projects**
<https://www.ontario.ca/page/building-ontario>

2.2 Quantifying and qualifying the issues identified as challenges

Quantifying challenges requires data collection and analysis in order to challenge single sourced information and data produced by school boards to justify decision making. Establishing such a database relies on gathering information from alternate sources such as the health sector, social services, justice, business, service providers and municipalities. Collaboration with all sectors is essential to producing a holistic impact statement on the adverse effects of school board decision making within current practices which negatively impact students, parents and communities.

Ontario's *Education Act* and the Ontario Ministry of Education have limited compliance frameworks for school board transparency and accountability and the Ministry has a hands-off approach to school board operations, as these entities are corporations or agents of the Ministry. A 2015 report from the Office of the Auditor General of Ontario reviewed oversight and funding issues in a value for money audit

https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_308en17.pdf .

The Ontario Ministry of Education is the only Ministry which does not display an Ontario public service commitment statement on its website. Complaints by parents are often rerouted back to school boards which have no formal complaint mechanisms. School boards are also not obligated to track data, particularly for information most useful to parents and the community. Thus, there is no impetus to respect public service standards to clients (parents and students).

The *Education Act* contains permissive language (“may”, “should”, “could”) in regulations with limited scope for compliance (“will”, “shall”, “must”). Reporting to the Ministry is an expectation, as is compliance with policy and regulation. However, there are no penalties, consequences or repercussions to school boards if these are not followed. School board senior administration do not face personal disciplinary, pecuniary or legal action for poor decisions with negative outcomes for students.

Performance measures within school boards are not common practice yet. Legal action and human rights tribunal application proceedings have brought changes to some practices and policies within school boards and realigned some administrative behaviour, however at great personal cost to parents and taxpayers who fund legal defenses of school boards while parents pay out of pocket.²³

These processes also take an inordinate amount of time and rarely positively impact a student once the process is completed after 5-10 years of litigation.

While the Minister of Education has oversight of school boards in principle, active intervention is engaged only when public outcry occurs, often revealing dysfunctional school board governance, abuses of power by school board administrators (student suspensions, expulsions, issuing trespass letters to parents who advocate on behalf of their child) and most recently, school board legal action against parents for exposing racism²⁴.

Increased media news articles provide the qualitative evidence of challenges faced by parents and students in making school boards more transparent and accountable. Efforts to communicate with school board staff or seek public data and information are often met with no response, a dismissive response or a refusal to provide the information. Responses to such requests are often scripted replicas offered by each school board acting in solidarity with one another. **Appendix 6** provides evidence of this practice in the pursuit of specific school profile data requested from school boards within the context of this research report.

Data collection for quantitative analysis for this report was provided through online student and adult surveys and qualitative analysis was obtained through lived experiences of parents through phone interviews and survey comment sections. **Appendix 7** highlights the survey results.

2.3 Goals and Next Steps to Consultant Identified Challenges

- i. School program information hard to obtain through school board website searches for parents seeking to relocate (**GOAL: improve information dissemination practices NEXT STEP: inspect all school board websites for accessibility, search functions by parent interest criteria (contact information for staff, programs in schools) and navigation features.**
- ii. Lack of diversity in school board leadership (**GOAL: improve hiring practices NEXT STEP: outsource administrative hires to external human resource agencies using equity and diversity principles, geographic proximity, experience and expertise as key criteria encouraging mobility within the sector and urban /rural relocations.**
- iii. Lack of data and /or reliable data (one source only- school board data) (**GOAL: improve information sharing practices between sectors. NEXT STEP: mandate school boards to**

- use research and data collection best practices to reflect multiple perspectives on data used for decision-making.
- iv. Municipal council members' perceived limited role in providing educational input (**GOAL: establish a link from citizens to school boards to communicate community interests. NEXT STEP: establish an education committee or education liaison person on municipal councils**)
 - v. Internet services -access and signal quality (**GOAL: Ministry of Education to assume responsibility to align with online learning access. NEXT STEP: create budget line**)
 - vi. Obtaining information directly from school staff and school board personnel (**GOAL: eliminate gate-keeping practices at school boards and increase accountability. NEXT STEP: Ministry of Education to mandate school board compliance with the Ontario Public Service Standard for Communication, Feedback & Complaint processes**)
 - vii. Student trustees having a restricted role in feedback as key clients of educational services (**GOAL: give students a voice as primary clients of educational services. NEXT STEP: Change the voting age in Ontario to 16 years of age to allow voting rights for student trustees in school board decision-making (to align with the minimum age for driving).**)
 - viii. School boards' perception of education monopoly over decision-making (transportation, costs, programs, school builds) business focused rather than service focused (bottom line vs client satisfaction) (**GOAL: change school board mindset from a publicly funded private corporation with complete autonomy to a client services mindset. NEXT STEP: remove the word "business" from Ministry of Education and school board positions, operational division name, policy documents and financial statements**)
 - ix. Disconnect between regional employment sectors and program offerings in Specialist High School Majors and Ontario Youth Apprenticeship Programs; no data on whether school boards are meeting the need for student skills training for local sector employment. (**GOAL: improve volunteer, co-op education placements and youth employment opportunities to keep students employed locally. NEXT STEP: local business associations to work in conjunction with school boards, students, parents and residents to align school- based SHSM and OYAP programs with local business and economic initiatives to support existing and developing employment sectors. Create intermunicipal student exchanges with different school board partners for students to explore out of area employment sectors of personal interest.**)
 - x. Lack of school board policy to support decisions which are detrimental to the community (parent-initiated survey input and feedback are ignored) (**GOAL: improved transparency and accountability to the community. NEXT STEP: school boards and Ministry of Education to adopt practices aligned with Ontario Public Standards in Communication, Feedback and Complaints processes.**)

Solutions to survey identified challenges are embedded in the above information.

2.4 Priorities identified through meetings with the Education Working group

a) Transportation

In 2017 the Ministry of Education released a discussion paper on improving student transportation. <https://www.ontario.ca/page/discussion-paper-new-vision-student-transportation#section-0> . Wellness and Equity formed part of the topics addressed. Submissions were made by various groups. One example was related to access to French Immersion programs in small population centres. The submission from Canadian Parents for French Ontario can be found in **Appendix 9**.

A 2015 report from the Office of the Auditor General of Ontario reviewed oversight and funding issues related to transportation

https://www.auditor.on.ca/en/content/annualreports/arreports/en17/v1_308en17.pdf

A follow-up on how school boards and consortiums implemented some recommendations from the report is found in **Appendix 10**.

A review of how local school boards implemented changes by the Ministry of Education is required to see how the right of a student to attend a school more accessible to their home, as a right articulated under the Education Act, Part II, School attendance paragraph 35 is aligned with local school board transportation policies. (Appendix 11)

A Child's Right based approach to school transportation (currently it is considered a privilege) and the community advocacy incorporating United Nations Human Rights High Commission policy on the 17 sustainable development goals²⁵ into domestic legislation is a necessary first step in addressing these issues locally. However provincial legislative changes are required.

b) Programming

French Immersion

Funding for French Immersion programs per student are based on a minimum 50% of the day spent in English and 50% of the day spent in French language instruction (150 minutes of the 300 minutes total instructional day). Schools in which this model is implemented are called “dual track” schools. Funding is the same regardless whether school boards increase the French language instructional hours in the program or not. <https://on.cpf.ca/files/2021/05/Tab-8-Hours-of-French-Instruction-and-Funding-Graphs-Elementary-2021-2022.pdf>

French Immersion program growth in Ontario is on par with French language school growth in enrollment at the elementary school level. Participation rates in French Immersion programs in the UCDSB and CSDBE0 are at 39% and 40% respectively, one of the highest in the province. <https://on.cpf.ca/files/Tab-1B-EFI-of-French-Daily-by-Board-JK-12-Total-FI-Enrolment-by-Board-2018-2019.pdf>

More Ministry funding for French Immersion can be accessed by school boards by having more school sites designated dual track French Immersion program sites in rural areas.

Dual track schools are currently viable schools in small population areas as indicated by enrollment data over the last 10 years for SDG. In addition, schools having child care sites with French Immersion programs are the most viable elementary schools. (Appendix 3)

International languages

The Ministry of Education provides additional funding to elementary and secondary students who wish to learn a language other than English or French.

http://www.edu.gov.on.ca/eng/curriculum/secondary/International_Languages_en.pdf

These languages can be those of family ancestry or other additional languages for students in high school interested in Specialist High School Majors in Arts & Culture, Tourism, Hospitality or Business. The programs can be offered after school or on weekends.

Culturally inclusive language learning may strengthen community identity and heritage (for example Scottish Gaelic, Dutch, German origins in SDG)²⁶ and is inclusive and equitable to refugee and immigrant families who wish to maintain their language and culture (Urdu, Arabic, Tamil, Filipino, Mandarin). Often, these families arrive in Canada already knowing more than one language (other than French or English) and want their children to access learning in both official languages as well as maintain their own language²⁷.

English as a second language (ESL) funding is available concurrently to French as a Second Language (FSL) funding as they are not mutually exclusive. In fact, a student who recently arrived in Canada in French Immersion receiving ESL support and being transported to school generates the most amount of funding to a school per student, above the base student funding model²⁸.

Native Languages & Indigenous Culture

Funding is available for school boards for native languages and students can study a native language in elementary schools and secondary school which can be substituted for French or can be in addition to French²⁹.

Indigenous culture awareness has been infused in all subject areas of the elementary and secondary school curriculum in Ontario³⁰.

Survey results indicated some interest in this area as the proximity of the Aknesasne first nation territory and students who self-identify with languages in the Audenosaunee (Iroquois), Mohawk, Haudenosaunee (St Lawrence Iroquois) and Huron-Wendat languages.

Indigenous programs are a means for school boards to access additional funding from federal and provincial funding sources and provide enhanced learning opportunity for all students in rural areas, especially those of aboriginal ancestry, but also those who wish to access aboriginal language and culture under the Equity, Diversity and Inclusion framework.

Specialist High School Major (SHSM)

In reviewing school and school boards websites, more work needs to be done to improve the visibility, relevance to students and surrounding economy and exploring partnerships with businesses for co-op student placements with SHSM programs.

A gap analysis is needed to find out which SHSM programs should be placed in which high schools with a review or realignment to follow. More information on SHSM and its importance is found in Appendix 8.

Special Education

Survey results indicate the highest demand for programming is meeting the needs of students with learning challenges (Appendix 7) and this funding needs to be monitored for equitable distribution by school boards to all students who require additional support for learning.

Under the Ontario Human Rights Code³¹ students with special needs have a right to support which meets their needs so that they have equitable opportunities for academic success as their peers.

School boards have a duty to accommodate these students “to the point of undue hardship” which is a very high threshold that is rarely met by school boards.

Vigilance and monitoring by parents are essential to ensure these students are accessing adequate program support, regardless of the language of instruction (students in French Immersion have equal rights to support as those in the English program).

It is also essential that students be formally identified as students with special needs through the Identification, Placement, Review Committee (IPRC) process of the *Education Act*, to ensure that school boards meet their obligations in the duty to accommodate, which does not just entail the creation of an Individual Education Plan (IEP) for the student³².

Informing parents of their rights and students’ rights is key to ongoing monitoring.

Virtual learning

Survey results conducted for this report indicate that students aged 12 and over prefer in person learning by far (Appendix 7). Toronto’s Sick Kids’ Hospital study on mental health also reiterated the importance of in person learning for all students but younger students in particular³³. While a very small number of students found virtual learning experiences positive, publicly available data shows that virtual learning for most students was a negative experience and it must never be the default delivery model of instruction in Ontario schools.

The COVID19 pandemic clearly illustrated the need for more access to virtual learning opportunities for students in small population centres where internet services and or family income to access internet services did not permit a positive learning experience.

While the government of Ontario has announced that virtual learning options will remain for elementary and secondary students³⁴, this model of instructional delivery should be reserved for exceptional cases where students are unable to attend school due to medical reasons or severe anxiety related to learning in schools, generally related to sensory processing disorders which are exacerbated in school learning environments.

Above all, school boards must provide home instruction to students unable to attend school in person and/or virtual learning equipment and internet facilitation devices if their families cannot afford the service in their home. Survey results indicate that the Ministry of Education should fund equipment and internet for virtual learning, particularly since the government has indicated two credits are to be earned through virtual learning by students prior to graduation.³⁵

Offering synchronous virtual learning for courses at a different high school

Survey results once again indicated that the UCDSB school board decision to change school start times earlier for high school students and later for elementary students on the premise of offering equitable access to synchronous online learning (teachers livestreaming lessons to students via video) for high school students to access courses available at other high schools simultaneously, requires further review. It was also stated that another reason was to provide high school students access to part-time employment after school with an earlier dismissal time. This reason **was not substantiated by student survey results. (Appendix 7)**

While the principle of enabling simultaneous courses at another learning site appears equitable, **the rationale for the earlier school start time for adolescents has ignored education research which indicates that this age group is more engaged with learning later in the morning and thus they should start later rather than earlier. The same research concluded that younger children learned best with an earlier start time to school.**³⁶

No consultation occurred with parents or students and email feedback and survey results by parents submitted to school boards on the topic of the hardship to families with finding childcare when older siblings are no longer available in the morning to mind younger brothers or sisters and put them on the bus or take the bus with them, has been largely ignored. **Finding child care in small population centres is also far more limited than in larger population centres and presents an additional obstacle and inequity for families in SDG.**

Cost cutting reasons cited by the school board for the bell time changes without publishing the savings in detailed financials is questioned. There is no evidence of cost savings if two busses would now go to a family's home instead of one previously in some communities for siblings in both elementary and secondary with different start times (parent anecdote). **The lack of transparency in school board decision-making has downloaded a new cost to families for child care while dismissing student and parent feedback on the consequences these decisions have for families and communities. (Appendix 7)**

c) Equity

In order to study school board decision and policy making, a study of the 2013 policy for Equity Diversity and Inclusion (EDI) PPM 119³⁷ emanating from Ministry of Education's *Equity and Inclusive Education Strategy 2006* and its implementation through to 2012 was undertaken with a view to explore how many policies were updated to comply with this new directive.

Highlights of the policy are presented in **Appendix 12** and starting points indicated below for further action.

First, equity must not be confused with equality. The latter indicates sameness for every person but equity means every person gets what he or she needs to be able to access, perform or acquire what everyone else can.

Second, the following principles from the Strategy must drive all policy review at school boards.

Guiding Principles of the Equity and Inclusive Education Strategy:

- *is a foundation of excellence;*
- *meets individual needs;*
- *identifies and eliminates barriers;*
- *promotes a sense of belonging;*
- *involves the broad community;*
- *builds on and enhances previous and existing initiatives;*
- *is demonstrated throughout the system*³⁸.

An example of equity is allowing international students to study in Ontario schools and obtain an Ontario Secondary School Diploma. However, in order to achieve that academic goal, they are supported through English as a Second Language (ESL) classes upon arrival until their language skills allow them to fully participate in all other subject classes.

International students pay tuition to local school boards in the same amount as what school boards receive in funding for local students, since school boards are not for profit corporations under provincial government and cannot charge more for tuition fees.

However, more international students generate extra funding to a local school and benefit the students attending from the community. More funding brings more staffing allocations which in turn can offer more extra-curricular activities for all students (clubs, sports teams, trips) that are not funded by the Ministry of Education and are undertaken by teaching personnel as a professional courtesy and personal interest in enhancing the student experience at school.

Investing effort in attracting international students to rural community schools is a direct investment to local students and the community at large, as these students have disposable

income from their families abroad. International students also bring diversity and inclusion to small population schools and students can experience reciprocal perspectives on locales, customs, language and cultures³⁹.

An example of inequity is a school not offering French Immersion or not offering day care or before/after school care on site.

Examples of local inequities in SDG schools are documented in Appendix 13.

Inequitable practices at school boards include policies not revised to reflect EDI principles, parent or student feedback not considered, student trustees unable to vote on school board decisions, community consultation which is information dissemination only, and lack of community use of schools.

Of particular note is that the *Strategy* includes language indicating school board compliance expectations (“*School boards will...*”). It is an expectation that all school board policy should be reviewed with an equity lens and compliance with the strategy. EDI principles should drive all policy review.

The application of equity principles to provincial policies and guidelines such as the Ministry’s *Pupil Accommodation Review Guidelines* and the *Community Planning and Partnerships Guidelines* are outlined at the end of this report.

d) Health & Wellness

The health and wellness of students came to the forefront in the last two school years due to the imposed restrictions caused by the COVID19 pandemic which closed schools for extended periods of time and forced students into online learning platforms. Neither teachers were prepared to teach, nor students were prepared to learn, or equipped to use, this mode of instructional delivery.

The pandemic did allow simultaneous research to be engaged and Toronto’s Sick Kids Hospital tracked data from children and youth from March 2020 to June 2021⁴⁰. Ontario saw the longest school closure period and the data has revealed the negative impact on student learning and student well-being.

Testimonials from teachers and parents indicated there was very little mental health support for students while schooling abruptly opened and closed on short notice and pivoted to virtual learning.

While the Ministry of Education allocated further funding for mental health supports for the 2020-2021 and 2021-2022⁴¹ school years, very little support was experienced by students.

In addition to lack of in-person schooling, many students were unable to pursue extra-curricular activity at school or in the community. This loss has added to the diminished physical and mental health of students as evidenced by survey anecdotal results in the comments section.

The student survey results in Appendix 7 indicated they prefer to walk or bike to school (81.82%) and go to school close to home, which supports a provincial health strategy to reduce childhood obesity⁴².

Transportation travel times by school bus which is the mode of transportation to school for 73.16% of students in SDG according to survey results, negatively impacts physical health and mental health as travel for some students was up to 2 hours per day (anecdotal comments).

This significant loss of time made engaging in extra-curricular activity nearly impossible and reduced the quality of life for both the student and the family. Changing bell times announced for implementation in September 2021 by the UCDSB school board has caused additional hardship to families who are all travelling to work or school at different times, eroding quality of time together as a family for 5 days out of 7 days of the week.

School board decisions made without the best interest of students in mind contribute to diminished physical and mental well being of children and youth.

The Ministry of Education must engage in research to establish the causal link between how local school boards complied with the 2006 Equity Strategy and the 2013 EDI policy and its impact on the current mental health of students.

One can hypothesize that school boards who complied and implemented all of the strategies were better prepared in supporting student when COVID19 restrictions came into force as they would have had organizational capacity and direction to support students. Where policies and practices were already in place, students may have fared better in coping with pandemic restrictions and virtual learning.

Poorly implemented or limited implementation of the strategy and policy may have created more mental health issues for students in certain school boards. Parents did provide testimonials that mental health support staff had been removed from schools prior to the start of the pandemic.

It would be expected that the Ministry of Education with its branch dedicated to Health and well-being would capture this nexus between boards and policy implementation and better serviced students. (Appendix 14)

Not implementing the 2006 Equity Strategy by 2012 and not being compliant with the 2013 EDI policy may have contributed to increased mental health and deteriorating wellness for students up until the pandemic (bullying issues, exclusion of special needs students, suspensions) and the lack of services throughout the pandemic;

Critical questions related to equity and mental health supports remain:

- are mental health nurses allocated to all schools, including small population schools?
- did a lack of mental health support lead to greater suffering for students during the pandemic?

- does data from local health units show correlation between agency statistics and lower student mental health in local conditions and poverty?

e) Sharing of space between co-terminus school boards

This difficulty resides in the branding and identity which each school board assigns to its image. While it may have been a practice for two different school boards to engage in shared space in the past, it may be harder to achieve within the current climate of greater competition between school boards for students.

The *Education Act* permits different school boards to use a school building as a shared space and for students to access schooling in a school closest to home (see Appendix 11), however the complexities of shared space by two different school boards to deliver educational services requires more research and data to capture successes and challenges of these arrangements. **The difficulty in obtaining this information from school boards is a barrier to dealing with this issue.**

Alternatively, recommendations on how to optimize unused space in an under-capacity school building by other education related professionals (speech language pathologists, occupational therapists, mental health professionals, child care providers) is a more viable option to maximizing building function and enhancing services to students and the community.

The Ottawa-Carleton District School Board Dedicated Space pilot project (First Ave PS) allowing private therapists into schools to provide ABA therapy to students with Autism is one such precedent setting initiative which has been very well received by parents.

SUMMARY

It is critical that the rights of students and parents are acknowledged and respected through authentic consultative processes with school board personnel with meaningful and reciprocal exchanges and a variety of data reviewed. Consultation needs to be reciprocal exchanges of oral and written submissions that are shared with all parties and the public.

All policies and decisions must reflect evidence-based processes and open and transparent financial implications and explanations that are logical and meaningful to both school boards and the community within the context of a public service provision model of quality and excellence, and not a business model of cost effectiveness and bottom-line savings, at the cost of the best interests of students, families and the community.

Policy updates need to be more nimble than legislative changes which are complicated and require government and political will to influence and parliamentary process which is cumbersome and prone to significant time delays. **Updates need to be evidence based with data, research, analysis and impact statements, demographic and trend information, be authentic and relevant to the target audience to which it applies.**

The “best interest of the child” is the new guide for creating policy and in policy review, by standards set in the international community incorporating the United Nations International Rights of the Child⁴³ and supported by the continued work of the University of Ottawa Interdisciplinary Research Laboratory on the Rights of the Child <https://droitcivil.uottawa.ca/interdisciplinary-research-laboratory-rights-child/> .

Changing organizational mindset and behaviour in school board practice is an obstacle that requires continued advocacy efforts to deconstruct perceptual or real bias, stereotypes, fossilized practices and approaches to decision-making and information dissemination to parents and the community.

New meanings for school, education and community engagement are evolving, so school boards must understand that it is not just parents and students as clients who are engaged, but that the parent community is supported by the business community, service clubs, non-profit organizations, local media and key community leaders.

Engaging the student voice to promote educational objectives is key to success in changing school board practices. Using precedent situations from other regions in Ontario such as students voicing disagreement with ‘quadesters’ and having the Toronto District School board reverse its decision for September 2021, due to student voices is strategically significant advocacy⁴⁴.

Similarly, the reversal of school board decisions on closing two rural schools in the Thames Valley District School Board in 2018 through community advocacy is also precedent setting⁴⁵

Advocacy must have a multipronged approach locally and provincially with multiple stakeholders to be most effective.

Empowering parents with accurate information, data, research and successful initiatives in other communities shifts the paradigm from “asking” school boards to demanding more appropriate resolution and improved services for students.

Finally, urban out migration caused by COVID19 pandemic restrictions and citizens searching for greater space and quality of life options presents a unique opportunity for SDG communities to capitalize on new residents adding their voice to advocacy to ensure their children get what they received in urban school, within their new communities. Reasons for population migration include less costly housing, more space, less pollution, quality of life, less congestion, traffic, green space and smaller schools.

RECOMMENDATIONS TO THE MINISTER OF EDUCATION AND GOVERNMENT

Ontario’s *Education Act* is revised on an as-needed basis and does not undergo systemic review in a cyclical manner. Regulations that are outdated or do not align with new Equity, Diversity and Inclusion principles must be reviewed and updated.

The Purpose of the Education Act and its regulations are:

PURPOSE

Strong public education system

0.1 (1) A strong public education system is the foundation of a prosperous, caring and civil society. 2009, c. 25, s. 1.

Purpose of education

(2) The purpose of education is to provide students with the opportunity to realize their potential and develop into highly skilled, knowledgeable, caring citizens who contribute to their society. 2009, c. 25, s. 1.

Partners in education sector

(3) All partners in the education sector, including the Minister, the Ministry and the boards, have a role to play in enhancing student achievement and well-being, closing gaps in student achievement and maintaining confidence in the province's publicly funded education systems. 2009, c. 25, s. 1.

<https://www.ontario.ca/laws/statute/90e02#BK0>

The lack of Ministry oversight in school board compliance to policies and regulations as noted in reports by the Office of the Ontario Auditor General⁴⁶ has led to parents, the public and municipalities sounding the alarm in lack of transparency in information sharing, collaboration and consultation practices at school boards. The lack of openness and accountability goes against the public mandate of public service and maintaining Ontario Public Service Standards⁴⁷.

While the *Act* confirms education as a public service,

Ministry continued

2 (1) The ministry of the public service known in English as the Ministry of Education and Training and in French as ministère de l'Éducation et de la Formation is continued. 1997, c. 31, s. 3.

Most school boards do not acknowledge, recognize or subscribe to the Ontario Public Service Standards which applies to corporations, agents and third-party consultants to the Ministry⁴⁸, as they ascribe themselves corporate status separate from the Ministry's identity. In doing so, their organizational behavior adopts a business-like corporate stance, engaging with the public as publicly funded private corporations.

As indicated earlier in this report, the Ministry of Education is the only Ontario Ministry that does not post a public statement of commitment to these Standards on its website. Having school boards conform to standards that the oversight branch of government does not commit to, is a significant obstacle, particularly when a major component of these Standards is communication and feedback processes on services.

- 1. Recognizing partnerships that are articulated in Ministry policy but not in the *Act* itself is another example of educational dissonance subject to further gap analysis:**

- a) Protocol for partnerships with external agencies
https://www.tcdsb.org/ProgramsServices/SpecialEducation/SpecialEducationPlan/SpecEdPlanDoc/21_Protocol_for_Partnerships_with_External_Agencies_PPM149_rev.pdf
 Protocol for partnerships with Parents as partners in education
http://www.edu.gov.on.ca/eng/parents/involvement/FS_PE_PolicyEn.pdf
- b) Community partners in bullying prevention

“8. Communications and Outreach Strategies

To support a whole-school approach, boards must actively communicate their policies and guidelines on bullying prevention and intervention to principals, teachers, and other school staff; students; parents; their Special Education Advisory Committee; school councils; and school bus operators and drivers. Boards should also provide this information to their Parent Involvement Committee, their Indigenous Education Advisory Council, and other appropriate community partners.”

<http://www.edu.gov.on.ca/extra/eng/ppm/144.pdf>

2. **A further example of a gap is the funding of technology versus textbooks, which are now largely out of use. While assistive technology for students with special needs (Special Equipment Allocation) is funded by a specific envelope of funding, more broad-based technology for all students, including access to technology is not a feature in regulations.**

The Ministry had to compensate during the pivot to remote learning through the COVID19 pandemic by ensuring students had access to a laptop. Despite this effort, internet access was still a significant obstacle for many students and families with multiple children in participating in remote learning. Survey results quantify this obstacle and indicate public opinion that the Ministry of Education should be responsible for this aspect of educational learning. (Appendix 6)

School sites should be repeater sites for enhanced internet capacity in small population areas and this requires collaboration and effort between municipalities, service providers and school boards to ensure better services for residents and students. **Internet service and laptop provision should be a provincial budget line for school boards if remote learning is implemented with mandatory credits assigned to it for high school graduation, which is a correlated commitment required for students to achieve this requirement.**

3. Collaboration between municipalities and school boards must be mandated by a Ministry policy, however, human behaviour dictates the success or failure of such initiatives. Engagement in collaboration is best obtained by repeated invitation to any interested individual within school board personnel since senior administration, school principals and teachers are often overwhelmed with meeting obligations. Public calls for this participation within the community and students is much more fruitful in obtaining an

interested individual. Informing parents and the community of school board consultations in the community is best taken on by municipalities with identified staff or committees with whom school boards feel more obligated to contact for initial notification.

4. Transparency and accountability are compellable since taxpayers fund educational services provided by school boards. Working with professional auditors in the community and the Office of the Auditor General of Ontario to continue signalling concerns at local and provincial levels by questioning school board data and fiscal assumptions is necessary and joining forces with other advocacy groups locally and provincially strengthens messaging and calls for action. Information sharing between groups makes advocacy more effective. Board delegations by such groups cannot be refused by school boards under the public service standard of feedback mechanisms.
5. Conducting bias reviews for school board policies (or lack thereof) of programs, transportation and school closures provides data for provincial corrective action. Information has power to change when it is corroborated from different sources and helps remove educational dissonance in policy and practices at school boards.
6. Insisting on research-backed staff proposals must be undertaken and reports challenged if no references to such background information has not been completed. Such reports should be qualified as void in status if not substantiated by policy or research or students/parent testimonials or data (survey). Lack of active research being used by school boards when it is supported by the Education Act and institutions such as the Ontario Institute for Studies in Education in Toronto, as well as many other universities Ontario and Ministry funded grants to do research in school boards, must be brought to the attention of the Minister of Education.
7. **Addressing delays in revisions to government initiatives such as the Rural Education Strategy, Community Planning & Partnership Guidelines and the Pupil Accommodation Review Guidelines requires a flipped approach where grassroots advocates prepare the desired template or model with recommendations for government to adopt.** A flipped model ensures that a local perspective is captured, or a shared challenge across many communities is addressed in a manner that most impacts the community and its students.

Presenting the Ministry with solutions from a grassroots approach to change policies which is not top-down Ministry directed (waiting for a template that never comes) or government directed (no action near elections) but community directed, with ministerial response to proposals (faster timeline, not dependent on elections and govt priorities as students wait for solutions) is more efficient and enables a response to proposed solutions.

8. Alignment of all Ministry of Education policies to the Equity Diversity and Inclusion principles must be verified by an audit requested of the Ontario Auditor General.
9. A Child's Right based approach to schools and community incorporating International Human Rights Commission policy into domestic legislation for the Ministry of Education to revise is vital to restore faith in the public education system.
10. Union interference through collective agreements which deter from the students' best interest (staff turnover due to absence, illness, leaves, timetables, preparation time, subject expertise) must be addressed with those organizations by the Minister of Education.
11. Increasing the role and importance of the student voice and the Ontario Association of Student Trustees as partners to municipalities, not sidelined or ignored (token student trustees with no voice, include voting rights for student trustees in school board meetings, and including them in municipal youth advisory roles).

CONCLUSION

The literature review for this study revealed interesting options used in other countries however international solutions do not work locally primarily because of how education is structured under provincial authority with no national framework for education.

While some federal funding in official languages education (minority and second language) does flow to the provinces, the majority of education funding is driven by taxpayers in every province.

The best solutions come from parents, teachers, residents and students in local communities as lived experience provides a source of ideas and solutions.

For this reason, a template is provided which outlines a simplified 'grassroots to government' model for public communication and consultation with school boards as agents and service providers of the Ministry of Education.

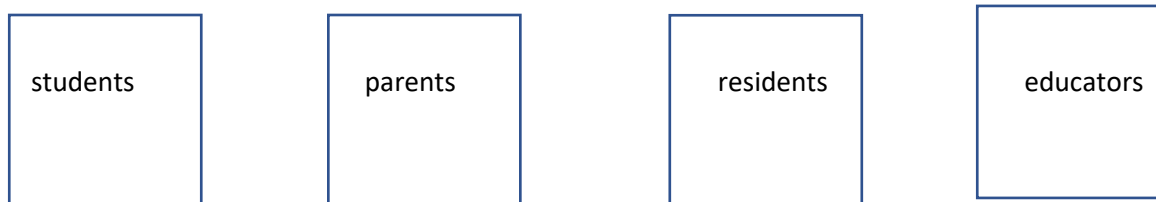
A SAMPLE TEMPLATE FOR COMMUNICATION AND CONSULTATION ON A PROVINCIAL RURAL EDUCATION STRATEGY

GRASSROOTS TO GOVERNMENT MODEL

- 1. STEP 1 – SCHOOL BOARD NOTIFIES COMMUNITY OF A CHALLENGE
OR
COMMUNITY NOTIFIES SCHOOL BOARD OF A CHALLENGE**

*(NOTIFICATION OCCURS THROUGH WEBSITES, MEDIA, SOCIAL MEDIA, DIRECT
EMAILS, DELEGATIONS, COMMUNITY NETWORK)*

- 2. STEP 2 – EITHER PARTY SEEKS FEEDBACK FROM EACH GROUP**



- timelines are advertised at time of notification, subject to the severity and urgency of the challenge
- sample timelines could be 2 weeks to 4 weeks for notification, 3-6 weeks for feedback
- feedback includes written submission, video presentation, survey data, written testimonials, in person meeting, site visits

- 3. STEP 3 –ALL FEEDBACK IS CATALOGUED, DOCUMENTED AND PUBLISHED ON
SCHOOL BOARD / MUNICIPALITY WEBSITES OR VIRTUAL DEDICATED SPACE
ACCESSIBLE TO THE PUBLIC FOR REVIEW**

- sample timelines for review should be 4 weeks

- 4. STEP 4 –SECOND FEEDBACK OPPORTUNITY WITH RESEARCH, LEGAL REVIEW,
POLICY IMPLICATION REVIEW, IMPACTS OF DECISION, EQUITY & BIAS
REVIEW**
- 5. STEP 5 –STAFF REPORT / COMMUNITY REPORT**
- 6. REVIEW OF INITIAL REPORT**
- 7. VETTING OF INITIAL REPORT BY OTHER PARTY**
- 8. DECISION ON SOLUTIONS TO THE CHALLENGE**
- 9. PROPOSED CHANGES COMMUNICATED**
- 10. PROPOSED CHANGES ADOPTED, POLICY REVISED OR REMAINS STATUS QUO**

RESULTS FORWARDED TO THE MINISTER OF EDUCATION

ENDNOTES

¹ SDG Strategic Plan, pages 1-2 (in Appendix 2)

² *Fewer School Boards Act, 1997*

³ Ministry of Education, *Indigenous Education Strategy*

⁴ Statistics Canada 2016 Census for Stormont, Dundas, Glengarry

⁵ Haudenosaunee – This name refers to the Iroquois Confederacy comprising of these Nations: Mohawk, Oneida, Onondaga, Cayuga, Seneca and Tuscarora. *Traditional Territory Acknowledgments in Ontario*.

⁶ *The Population Centre and Rural Area Classification 2016*

⁷ Ontario College of Teachers *Professional Standards*

⁸ Ministry of Education 2006 *Equity Strategy* (page 8)

⁹ Statistics Canada 2016 Census for Stormont, Dundas, Glengarry

¹⁰ Education Research Brief no.1 – *The Decline of Enrollment in Quebec's English Language School Sector* (Quebec English-Speaking Communities Research Network)

¹¹ Fraser Institute Report *Where Our Students Are Educated, Measuring Student Enrollment in Canada*, 2017 (page 5)

¹² *Fewer School Boards Act, 1997*

¹³ *Protocol for Agreements for Minority Language Education and Second Language Instruction 2019-2020 to 2022-2023 between the Government of Canada and the Provinces and Territories* – Council of Ministers of Education

¹⁴ Action Plan for Official Languages 2018-2023: Investing in our Future

¹⁵ United Nations World Court decision declaring funding of Catholic schools in Ontario as discriminatory

¹⁶ Pupil Accommodation Review Guidelines 2016 and revised guideline 2018

¹⁷ Ontario Ministry of Education. *Technical Paper 2020-2021*, page 118.

¹⁸ Email with Ontario Ministry of Education staff July 9, 2021 confirming there are no provincial Ministry policies related to transportation funding

¹⁹ Community Schools Alliance Power point presentation to Ontario Small Urban Municipalities 2018 conference (slides 8-12)

²⁰ Ontario Infrastructure projects/construction of new schools [and](#) Ministry of Education *Facilities Partnership Guideline*

²¹ School Information Profiles (SIP) from UCDSB and CDSBEO and Open Source government data

²² Toronto's Sick Kids Hospital *Sick Kids Releases new research on how COVID-19 pandemic has impacted child and youth mental, physical health*

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²⁵ United Nations Human Rights High Commission policy on the 17 sustainable development goals

²⁶ Statistics Canada 206 Census for SDG – cultural origins and languages spoken and most spoken immigrant languages in SDG

²⁷ CBC News <https://www.cbc.ca/news/canada/manitoba/newcomers-to-canada-enrolling-children-in-french-immersion-1.1396457> ; Canadian Parents for French submissions to the Senate Standing Committee on Official Languages

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- ²⁸ 2021-2022 Technical Paper, Ontario Ministry of Education funding allocations
<http://www.edu.gov.on.ca/eng/funding/2122/2021-22-technical-paper.pdf>
- ²⁹ Native language funding, 2021-2022 Technical Paper, Ontario Ministry of Education
- ³⁰ *First Nations, Inuit & Métis Studies Curriculum*. Ontario Ministry of Education
- ³¹ Education as a service under the Ontario Human Rights Code
- ³² *Special Education in Ontario, Kindergarten to grade 12 Policy and Resource Guide (section D – IPRC process and section E -IEP)*
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- ³⁶ Later start time for high school students in some school boards (Thunder Bay, Toronto, London)
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- ³⁸ Ministry of Education, 2006 Equity and Inclusive Education Strategy
- ³⁹ *Economic Impact of International Education in Canada 2017 update*. Government of Canada
- ⁴⁰ Toronto's Sick Kids Hospital *Sick Kids Releases new research on how COVID-19 pandemic has impacted child and youth mental, physical health*
- ⁴¹ Ministry of Education May 4, 2021 Memorandum to School boards on allocations for mental health support for students
- ⁴² Reducing Childhood Obesity in Ontario, provincial and federal strategy documents
- ⁴³ Interdisciplinary Research Laboratory on the Rights of the Child, University of Ottawa
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- ⁴⁷ Ontario Public Service Standards
- ⁴⁸ School boards as agents of the Ministry of Education for Ontario Public Service Standards compliance

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UCDSB <https://go.boarddocs.com/can/ucdsb/Board.nsf/goto?open&id=BHNKVVW5356BD> user agreement <https://go.boarddocs.com/can/ucdsb/Board.nsf/goto?open&id=B75HVX4A5C66>

CDSBEO http://cdsbeo-1.azurewebsites.net/policies/F4-2_Community_Use.pdf

CEPEO https://cepeo.on.ca/wp-content/uploads/2018/08/INS12_LocationLocaux.pdf

Legal case involving school board and municipality

<https://www.canlii.org/en/on/onca/doc/2021/2021onca544/2021onca544.html> school board and municipality litigation regarding services and sharing of assets and benefits

Statistics on international students and trends

https://www.thestar.com/news/canada/2021/07/29/canadas-international-students-are-becoming-less-diverse-heres-why-ottawa-says-thats-a-problem.html?source=newsletter&utm_content=a13&utm_source=ts_nl&utm_medium=email&utm_email=CB4524CC985A903ABCB6EF5A4AD565DE&utm_campaign=tmh_64833

They left the Philippines for temporary work. How this small Manitoba town became home <https://www.thestar.com/news/canada/2021/07/24/they-left-the-philippines-for-temporary-work-how-this-small-manitoba-town-became-home.html>

United Nations Rights of the Child <https://www.ohchr.org/en/professionalinterest/pages/crc.aspx>

Ontario Catholic School Trustees Association - School Board Trustee Guideline https://www.ocsta.on.ca/ocsta/wp-content/uploads/2020/03/OESC_Good_Governance_Guide_OCSTA_mar4.pdf

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