

**Submission to the Standing
Committee on Heritage,
Infrastructure and Cultural
Policy on Bill 46, *Protect
Ontario by Cutting Red Tape
Act, 2025***

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Submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy on Bill 46, *Protect Ontario by Cutting Red Tape Act, 2025*

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO), founded in 1919, represents more than 60,000 members, including public secondary school teachers, teachers in provincial schools, occasional teachers, education workers, and support staff at six Ontario universities.

OSSTF/FEESO is pleased to provide its submission to the Standing Committee on Heritage, Infrastructure and Cultural Policy. OSSTF/FEESO's submission on Bill 46, *Protect Ontario by Cutting Red Tape Act, 2025* focuses on university governance considerations which were included in the Spring 2025 Red Tape Reduction Package.

While Bill 46 *Protect Ontario by Cutting Red Tape Act, 2025* does not directly amend the statutes governing postsecondary institutions, the Spring 2025 Red Tape Reduction Package accompanying it signals an intention to consider reforms aimed at improving efficiency, accountability, and system-level coherence. In the absence of detailed legislative proposals, and given the limited information currently available, OSSTF/FEESO offers a principles-based submission grounded in established governance research and broader sectoral evidence. The observations that follow are framed to assist in the development of a coherent and methodologically sound foundation for any future policy direction. The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) was founded in 1919. OSSTF/FEESO represents over 60,000 public high school teachers, occasional teachers, educational assistants, instructors, psychologists, secretaries, speech-language pathologists, social workers, plant support personnel, and many other educational workers.

Any examination of governance reform must begin with the principle that decision-making structures function effectively only when they incorporate meaningful representation and engagement from those with direct knowledge of institutional operations. In OSSTF/FEESO's opinion, this includes students, support staff and faculty. Research in contemporary governance consistently demonstrates that universities operate as multifaceted systems whose success



depends on the integration of academic, administrative, and support functions. Analyses of governance outcomes show that decision-making bodies benefit greatly from diverse internal expertise, which enables more accurate assessments of operational needs and supports the effective implementation of institutional priorities. For example, in the context of this consultation, it has been widely noted across the sector that the government's outreach to date has been limited in scope, raising the analytical risk that important dimensions of the governance landscape may be overlooked. More comprehensive engagement would provide a stronger evidentiary basis upon which to design reforms that reflect the realities of institutional life.

Although most of Ontario's universities operate within a bicameral governance structure which is designed to ensure a clear division of authority between academic policy and broader institutional governance, its application has historically resulted in the exclusion of support staff from meaningful participation in collegial bodies such as senates. This exclusion persists despite the fact that support staff play an integral role in sustaining the academic mission, contributing operational expertise that directly shapes students' educational experiences and the institution's capacity to deliver its programs. OSSTF/FEESO believes that institutions function more effectively when decision-making bodies integrate perspectives from all groups with substantive knowledge of institutional operations. Support staff, who often spend their entire careers within a single institution due to limited mobility compared to faculty, possess deep institutional memory and a long-term understanding of operational realities that can significantly strengthen academic policy development. For these reasons, OSSTF/FEESO supports the evolution of collegial governance structures to include support staff representation within the bicameral system, ensuring that academic policy development benefits from the full range of institutional expertise essential to evidence-based decision-making.

Transparency is an equally central component of sound governance. Universities are publicly funded institutions whose decisions shape educational quality, labour conditions, research capacity, and regional development. OSSTF/FEESO believes that transparency enhances institutional integrity, strengthens public trust, and enables early identification of risks. Effective governance requires clearly articulated criteria for distinguishing between matters that legitimately require confidential deliberation and those that should be conducted openly.



Previous analyses of governance challenges across postsecondary systems have frequently identified ambiguity in this regard as a source of opacity and poor decision-making. Establishing principled, publicly communicated standards would serve to clarify expectations, improve institutional accountability, and reinforce public confidence in university governance processes.

A further dimension of transparency concerns the allocation and use of public funding within universities. Given that postsecondary institutions receive more limited government investment to support teaching, research, and student services, it is essential that financial decision-making processes clearly demonstrate how resources are directed toward core academic and operational functions. OSSTF/FEESO highlights the importance of ensuring that public funds strengthen the services students rely on, support the effective operation of faculties and academic departments, and enhance research and innovation capacity. Clear reporting mechanisms are needed to show how funding flows through institutional structures, particularly in environments where multilayered administrative frameworks can obscure how financial decisions are made and which activities are prioritized. Enhanced financial transparency would help ensure that resources are used efficiently, align with institutional mandates, and remain focused on the public purposes for which provincial funding is provided.

Accountability mechanisms must also form a core component of any governance review. Modern public-sector governance is increasingly characterized by systematic evaluation, performance measurement, and continuous improvement. Universities, which face evolving demographic, financial, and policy pressures, require governance structures capable of assessing their own effectiveness and adapting to emerging conditions. OSSTF/FEESO identifies that regular board self-assessment, the use of transparent governance-performance indicators, and periodic independent evaluation as key features of resilient governance systems. Analyses of postsecondary financial pressures in Ontario further highlight the need for governance bodies to monitor sustainability, risk tolerance, and long-term institutional coherence. Without such evaluative structures, governance bodies may be unable to detect systemic vulnerabilities or respond effectively to environmental changes.

A further central principle concerns the appropriate limits of government intervention in university governance. Comparative analyses of governance systems in multiple jurisdictions show that excessive centralization of authority tends to generate inefficiencies, reduce

institutional autonomy, and impede innovation. International experiences demonstrate that highly interventionist models often result in unintended consequences that governments later attempt to reverse. Research in the Canadian context similarly indicates that direct state involvement in academic and institutional decision-making can create misalignments between governmental priorities and the operational realities of individual institutions. The variability across Ontario's universities, in the mission, scale, research intensity, and community role, further underscores the analytical limitations of governance models that concentrate decision-making authority within government. OSSTF/FEESO submits that sustaining institutional autonomy is essential to preserving academic freedom, fostering innovation, and enabling universities to meet both provincial and societal needs.

Any forward-looking review must also be informed by a broad, ongoing consultation. Sector participants have repeatedly emphasized that reforms developed without comprehensive engagement risk overlooking essential operational considerations and may result in governance models that are conceptually coherent but practically ineffective. Ensuring that future consultation mechanisms are inclusive, structured, and methodologically robust will enhance both the legitimacy and the long-term viability of any policy changes. Sustained engagement processes are also necessary to ensure that reforms are responsive to evolving institutional conditions rather than anchored in static assumptions.

Finally, it is critical that any analysis of governance reform accurately situates the root causes of the current pressures facing Ontario's universities. Extensive sectoral research demonstrates that persistent fiscal constraints, rather than governance architecture alone, are a primary driver of institutional instability. Ontario's postsecondary funding levels have remained significantly below national norms for many years, with operating grants per student ranked at the lowest level in the country and declining in real terms over time. Concurrently, the prolonged freeze on domestic tuition has limited universities' capacity to generate revenue necessary to maintain the program breadth, student supports, and institutional infrastructure. These combined constraints have left institutions increasingly vulnerable to financial shocks and have reduced their ability to support high-quality learning environments. It would therefore be analytically inaccurate to

regard governance reform as a sufficient remedy for sectoral instability without addressing the broader structural underfunding that underlies many of the challenges confronted by institutions today.

In conclusion, the success of the current consultation will depend on grounding any reforms in evidence-based principles that reflect the complexities of institutional operations. This submission highlights the importance of meaningful engagement, transparent and clearly defined governance processes, effective accountability mechanisms, appropriate limits on governmental intervention, and consultation frameworks that are broad and methodologically rigorous. Together, these principles provide a coherent foundation for any future policy development. OSSTF/FEESO remains committed to contributing constructively to this process and requests continued involvement as the government's review progresses.



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