



## **OSSTF/FEESO Comments to the Ministry of Education Re: Bill 33**

### **Proposal for amending the *Education Act* related to school board accountability, transparency, safety, and rights**

#### **Preamble**

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) was founded in 1919. OSSTF/FEESO represents over 60,000 public high school teachers, teachers at provincial schools, occasional teachers, educational assistants, instructors, psychologists, secretaries, speech-language pathologists, behaviour analysts, child and youth workers, social workers, plant support personnel, and many other educational workers and support staff in public schools and universities.

OSSTF/FEESO is pleased to provide its submission on *Bill 33, the Supporting Children and Students Act, 2025*.

#### **K-12 Sector Issue Overview**

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) is disappointed that the Ford government's proposed changes in *Bill 33* continue to fail to address the real problem of chronic underfunding in Ontario's public education system.

#### **Schedule 2 – School Boards under the *Education Act***

##### **1 Subsection 1 (1) of the *Education Act* is amended by adding the definitions for external auditor, internal auditor, and Ministry auditor.**

"Currently the *Act* requires boards to have external auditors and audit committees. The *Act* is amended to also provide for Ministry auditors and internal auditors, and to make related amendments."

##### **2 (1) Subsection 8 (1) of the *Act* is amended by adding the following paragraph: policies and guidelines: school board expense policies**

"The Minister is given power to establish policies and guidelines respecting school board expense policies, including requirements relating to discretionary spending."

#### **Analysis**

The Ministry already can investigate governance and financial concerns in school boards. The Ministry can already establish, through Regulations, reporting requirements on financial information. The government does not need new legislation to address the few incidents of alleged financial mismanagement in school boards.

The duplication of work performed by different auditors (internal, external, and Ministry appointed) will increase the costs to individual boards and *Bill 33* does not indicate if there will be additional funding provided to already cash-strapped school boards.

**6 Sections 230 to 230.3 of the Act are repealed and the following substituted:  
Matters of public interest**

“Amendments provide that the Minister may give directions to the board to address a matter of public interest if, in the Minister’s opinion, a board, board member or director of education has done or omitted to do something, or is likely to do or omit to do something, that could affect a matter of public interest. Control and charge of a board may be vested in the Minister if a board does not comply with a Minister’s direction, or in certain other circumstances. Currently, such vesting orders must be made by the Lieutenant Governor in Council.”

**Analysis**

If *Bill 33* is passed as presented, it would grant to the Minister of Education significant additional powers to more easily place school boards, democratically elected trustees, and directors of education under investigations which could result in more boards being placed under direct provincial supervision, taking power away from democratically elected trustees and replacing community decision-making with directives from Queen’s Park.

The criteria to initiate an investigation has been significantly expanded compared to previous legislation and regulations. In the proposed legislation, “[t]he Minister may direct an investigation of a board’s affairs if the Minister has concerns about a matter of public interest.” These concerns include, but are not limited to, duties related to the delivery of education programs; student achievement and well-being; the financial affairs of a board and its use of resources; the construction, maintenance, management, acquisition, and disposition of capital assets; board governance; the day-to-day management of a board; and the engagement of parents and other entities that may have an interest in the activities of a board.

Based on the plain reading of *Bill 33*, any concern from the Minister about any duties done or not done by a board or a directing mind of the board, could lead to an investigation by any person or entity as directed by the Minister.

When the Minister has made an order of putting a board under supervision, the Minister will now have “control and charge over the board generally with respect to any matter in any way affecting the board’s affairs” according to 230.5 in the proposed *Bill 33* legislation. The Minister could then sell any board asset and decide who to appoint or dismiss board officers and employees.

This is not education reform; it is a consolidation of power by the Minister of Education, cloaked in the language of transparency and accountability, designed to suppress dissenting voices from locally elected trustees. This will tighten Queen’s Park political control over a public education system the government has failed to adequately fund since 2018. Boards will no longer be able to advocate for their communities, schools, and students if they feel they may be put under supervision or removed from their positions. This is anti-democratic.

The expanded powers of the Minister represent a much deeper erosion of governance at the local level. Each trustee was democratically elected by their constituents to represent them on the school board where essential decisions are made on the future of education in their communities. Trustees who are cowed by this legislation to not speak up for the needs of their communities, ensures that the unique local needs of students and families may not

be considered by the edicts from Queen's Park. Students, families, and the entire local community will not see their legitimate concerns be addressed because of government overreach.

**3 Subsections 11.1 (2) to (5) of the Act are repealed.**

**4 The Act is amended by adding the following section: Work with local police services**

170.0.2 (1) Every board shall work with its local police services to, in the prescribed circumstances,

- (a) provide the local police services with access to school premises;
- (b) permit the local police services to participate in school programs; and
- (c) implement school resource officer programs, where such programs are available.

"A requirement is added for boards to work with local police services to provide them with access to school premises, permit them to participate in school programs and implement school resource officer programs."

## **Analysis**

In the Ontario Human Rights Commission's (OHRC) March 2025 report, *Dreams Delayed: Addressing Systemic Anti-Black Racism and Discrimination in Ontario's Public Education System*, accessible here [OHRC Report: Dreams Delayed](#), the OHRC outlined its position on School Resource Officer (SRO) programs stating that "[p]olice in schools may subject Black and other racialized children, and particularly Black boys, to a higher level of surveillance that could ultimately significantly impact their mental health and education."

The OHRC also stated that "[a]ny decision regarding police involvement in schools should be made only after carefully considering existing research and in consultation with all local voices, including parents, students, community members, and organizations."

The School Resource Officer (SRO) program, as presented by the Ford government in *Bill 33*, does not respect the conclusions reached by the OHRC after extensive consultation with Black and racialized students, in both the Public and Separate school systems and in both French and English boards.

*Bill 33* provisions related to SROs, as currently presented in the current iteration of the *Bill*, do not respect the following OSSTF/FEESO External Policies directly or indirectly relevant to the question about SROs. These external Policies were overwhelmingly approved by more than 500 OSSTF/FEESO member representatives at different Annual Meetings of the Provincial Assembly.

### **7.15. Anti-racism and Anti-discrimination**

It is the policy of OSSTF/FEESO that:

- 7.15.2. the Ministry of Education should provide the resources required to create a robust and comprehensive protocol guiding all police-student interactions that occur in or on school property, or in relation to events that occur in schools; (A.21)

- 7.15.5. any research that fails to take an anti-oppression approach, should not be considered credible or relevant for new or revised publicly-funded school/ board policy, procedure, and/or program that involves the use of police; (A.21)
- 7.15.6. any and all policies and programs that have discriminatory effects on racialized students, particularly Black, Indigenous, racialized, marginalized students as well as students living with disabilities and those of the 2SLGBTQI+ communities should be rescinded and not be permitted in any Ontario school or board of education; (A.21)
- 7.15.7. all School Resource Officer (SRO) or other similar programs and related policies that have led to the securitization and surveillance paradigm in Ontario schools should end immediately; (A.21)
- 7.15.8. the Ministry of Education and employers should provide significant and official representation based on the principle of equal partnership on all committees established to identify, develop, implement, and monitor policy and make recommendations regarding materials related to anti-discrimination education; (A.23)
- 7.15.12. the cultural and racial identities of students should be affirmed in an equitable and appropriate way through learning experiences in schools; (A.23)
- 7.15.14. the Ministry of Education should conduct an immediate, independent, third-party review of every "Police-School Board Protocols" document for all schools in Ontario; (A.23)

The ability of the Lieutenant Governor in Council to make regulations on how boards shall work with local police services and to determine the scope and method of implementation of the SRO programs does not respect the recommendations of the OHRC and the publicly stated positions of OSSTF/FEESO. Local board autonomy to make appropriate decisions after fulsome consultations with all stakeholder groups on SRO programs, will be completely undermined should *Bill 33* be invoked into law as written.

The Ford government has not produced any peer-reviewed research on the potential benefits and harms to students, especially those who live with a disability, identify as Black, Indigenous, racialized, and/or as a member of the 2SLGBTQIA+ community, of having police regularly in schools and at educational activities and events.

This lack of sharing Ministry research is contrary to the position, excerpted below, issued by the Ontario Association of Chiefs of Police on July 20, 2020. The statement is available here: [OACP Statement about school-resource-officer-programs.aspx](https://www.oacp.ca/wp-content/uploads/2020/07/OACP-Statement-about-school-resource-officer-programs.aspx)

Police leaders need more and better research that not only evaluates SRO programming, but one that also pays close attention to the needs and experiences of Black, Indigenous and People of Colour (BIPOC) students.

The current state of the literature makes it difficult to justify SRO programming in schools, but not necessarily because the literature suggests it is not effective. There simply has not been enough research on this issue, particularly in the Canadian context, to make that claim.

It is time for police leaders to support evidence-based SRO research, particularly with respect to evaluation that places the experiences of BIPOC students front-and-centre.

All schools should have a School Resource Officer program that is appropriately staffed, not with police officers but by qualified board employees such as, but not limited to, registered social workers, child and youth workers, school-based nurses, mental health professionals, attendance counsellors, and other professionals who can support all students needing assistance. These board employees can best support the root causes of behavioural and emotional issues of students, such as trauma, poverty, and family instability. Even when police officers are trained in youth engagement, their presence can unintentionally intimidate or even criminalize behaviours that are more effectively addressed through therapeutic or educational interventions and making deeper community connections.

Local stakeholder tables must be created well before the implementation of any SRO program, so that the program reflects the actual needs of the students. These tables should continue to be active after deployment of a SRO program to ensure the allocated resources, funded by the government, are used to meet the particular needs of each school.

OSSTF/FEESO recommends that the OHRC's guidance on effective stakeholder consultations should be the norm across the province. Participating stakeholders should reflect the school community's diversity and the lived experiences of students. This will require the ongoing participation of stakeholders to ensure the SRO program evolves to better support the specific needs of the students, their families, and their community.

As such, each school truly becomes a community hub where the voices of community services, such as social services, public health, and police services, can be heard by parents, students, and education workers so important informed conversations can be had to achieve the best program in the best interests of all students.

Police in schools should only be seen as a last resort following meaningful efforts to not only provide professional staff, including public health nurses, but also address food and housing insecurity which have a direct impact on students' readiness to learn and as such ability to regulate their behaviour within anticipated school norms.

## **5 *The Act* is amended by adding the following section:**

### **School names**

Application for approval

174 (1) Before a board may name a new school or change the name of an existing school, the board shall apply to the Minister, in the form required by the Minister, for approval of the name.

"A new section requires boards to apply to the Minister for approval of the name of a new school or to change the name of an existing school. Provisions are included respecting the approval process and what the board may do upon approval or rejection of a name."

## Analysis

Boards need to do their due diligence in their deliberations, after meaningful consultations have been made with all key stakeholders and community groups, when they first name a school/worksite or change an existing name. The involvement of the Ministry should only occur when there is a compelling case made that the consultation process and/or board policies and procedures related to naming buildings or locations were not respected.

If such an allegation is made to a representative of the Ministry, the board should be informed of the details of the allegation and be provided with sufficient time to provide to the Ministry the specific details of the policy and procedure followed by the board or the opportunity to reconsider the process.

If there are no egregious breaches of the process, the decision of the board should stand. If there are serious breaches of the process, then the board should be directed to respect existing processes, or develop new ones, to allow a fair and transparent process be enacted to ensure the voices of the community have been heard before the board decides as to the name of a particular school or worksite.

## Post Secondary Implications and Concerns

The [\*Supporting Children and Students Act, 2025\*](#), *Bill 33* represents an existential threat to the autonomy of our world-class publicly-funded higher education system.

It reflects the Ontario Government's continued problematic efforts to exert increased control over colleges and universities, utilizing legal tools to prioritize political agendas over the educational needs of Ontario's students.

As written, *Bill 33* will erode the invaluable contributions that Ontario colleges and universities make to society through their world-class teaching, research, and innovation. Annually, thousands of graduates, in all disciplines, enter the workforce and provide the necessary human capital and knowledge to enhance Ontario's prosperity and who play a fundamental role in fostering democratic values.

OSSTF/FEESO is requesting that the Ontario government properly and transparently fund the higher education system and acknowledge and respect the fundamental principles of institutional autonomy in the post-secondary education (PSE) sector:

- Institutional autonomy is crucial for colleges and universities to function properly as centers of free inquiry, enabling them to pursue knowledge and serve society.
- Autonomy ensures freedom to pursue inquiry, disseminate knowledge based on evidence, truth, and peer review, and pursue their mission under the oversight of their governance bodies.
- Institutional autonomy comes with responsibilities, including conducting research according to the highest possible ethical standards of excellence, ensuring high-quality education to as many academically qualified individuals, who reflect the rich diversity of Ontario's population, and to ensure public financial accountability through effective boards and stringent audits.
- Collaboration with industry is vital, but colleges and universities must have guidelines and strict policies to protect academic independence in hiring, course content, academic programming, student admissions, and research.

- Commitment to effective governance and administrative structures that reflect academic values, public accountability and transparency, and addresses the needs of all students, staff, communities, and society.

### **Schedule 3 - Admissions, merit-basis**

**(2) Every college or university referred to in subsection (1) shall,**

- (a) ensure that when assessing applicants for the purposes of admission into a program of study, assessment is based on the merit of the individual applicant; and**
- (b) publish, in a manner accessible to the public, the criteria and process to be used by the college or university in assessing applicants for admission into each program of study.**

We are also intensely concerned by the government's ongoing attacks on equity-based initiatives at Ontario colleges and universities. Contrary to this government's mischaracterization, all students must still meet rigorous academic requirements for admission into a college or university in Ontario. These particular and few equity initiatives empower PSE institutions to foster more diverse and inclusive learning environments for students, which can only enhance the academic experience for all students.

The autonomy of higher learning institutions is significantly eroded by *Bill 33*, as written, when the government determines what criteria can and cannot be used in post-secondary institutions' assessment of applicants to enter their academic programs. The proposed Regulation (3) (c) "provid[es] for exceptions to subsection (2)" but there are no specifics provisions on the method of seeking such exceptions and if there will be any appeal procedure that takes into account the protected grounds under the OHRC.

The drafting of *Bill 33* is certainly not in line with the government's professed commitment to engaging in meaningful consultation with all stakeholder groups to work towards healing past injustices. How will *Bill 33* bring Ontario closer to meeting its commitment to Reconciliation with Indigenous Peoples and all other peoples from different equity-seeking groups that have had to overcome systemic barriers to equitable access to higher learning in Ontario and in Canada?

All applicants granted admission to any post-secondary institution must meet reasonable qualifications and merit while also valuing applicants' additional experiences, skills, backgrounds, lived and work experience.

The promotion of human rights and equity is vital to achieving a diverse and representative student population which reflects the diversity of the province. There is a positive effect on the educational experience and outcomes of historically under-served students when other students, professors, and staff reflect their identities. The way to achieve a diverse and representative student population is to work to intentionally identify and remove barriers for Indigenous peoples and equity-seeking groups at each stage of the application process so that no stage creates a barrier for applicants.

Having criteria dictated by the government, may impact efforts by each post-secondary institution to achieve the most diverse student community that reflects their local communities. The world is seeing the turmoil occurring in the post-secondary education sector in the United States by a President who has decided to politically interfere with the autonomy of these institutions for purely ideological and spiteful reasons.

When the government, the holder of the purse strings for most of the funding that colleges and universities need to provide world-class programming for all students, then decisions made by these institutions cannot be made without considering the potential financial impact if those decisions do not fully comply with the position of the government in power. Centralized political control over admissions and institutional governance is how free inquiry, the heart and soul of colleges and universities, withers and dies. That is a pathway OSSTF/FEESO members do not want to travel and, we sincerely hope, that is a sentiment shared by the government.

**Schedule 3 – 21.1 (1) The Lieutenant Governor in Council may make regulations governing any fees that a college of applied arts and technology or publicly-assisted university charges to students or requires students to pay.**

*Bill 33's* proposed changes to the regulation of fees also reinforces our fears that the Ontario Government will stop at nothing to exert its influence over every aspect of PSE communities in Ontario. This *Bill 33* provision is similar to the 2019 Ford government's "Student Choice Initiative" (SCI) that allowed post-secondary students to opt out of paying certain ancillary fees that supported student-led services and organizations, such as student unions, campus newspapers, and on-campus food banks, that were deemed by the government as "non-essential".

The Divisional Court unanimously ruled against the Ford government that the SCI was unconstitutional, stating that:

University and college student associations are private not-for profit corporations. Ontario does not fund these associations directly or indirectly. Ontario does not control these associations directly or indirectly. There is no statutory authority authorizing Cabinet or the Minister to interfere in the internal affairs of these student associations. The autonomy of universities, as private institutions, is fundamental to the academic freedom that is their hallmark.

The government appealed the Divisional Court's ruling to the Court of Appeal for Ontario which agreed with the lower Court's conclusion, but not with the basis for their ruling. The Court of Appeal's decision, as it relates to the nature of student unions and associations, noted that:

Mandatory fees for student associations – collected by universities and remitted to the student associations – have been in place in universities since the 1960s. Student associations have joined umbrella provincial and/or national student organizations, which are similarly dependent on mandatory fees collected by the universities. This funding structure has permitted student associations to play important roles in university governance," (para 58).

Indeed, given the role played by student associations in university governance, the framework is a profound interference in university autonomy – not a mere fettering of the universities' discretion, as the Minister submits. The Minister has no authority to fetter the exercise of the universities' discretion concerning student associations in any event – again, not because universities are immune from regulation, but because the Legislature has chosen not to regulate them. Instead, the Legislature has chosen to establish the universities as autonomous entities, free from government interference in



matters of internal governance. The Minister cannot exercise executive action in a manner that conflicts with the *University Acts*, (para 60).

The Ford government chose to not appeal this second decision to the Supreme Court of Canada and waited until now to amend the *Ministry of Training, Colleges, and Universities Act* which, if passed as presented will surely result in more protracted and expensive litigation.

Vibrant student associations are essential to the democratic vitality of our institutions and our province. This is the positive outcome when an open debate about consequential and difficult issues is encouraged on campuses.

Students have a Charter-protected right of association and to dissent. *Bill 33* seems to be a partisan way of restricting funds to student organizations to slowly strangle their ability to effectively associate to raise important issues to all Ontarians.

### **Schedule 3 - Research security plan**

#### **Application**

**20.1 (1) This section applies to every college of applied arts and technology and to every publicly-assisted university.**

#### **Development and implementation of plan**

**(2) Every college or university described in subsection (1) shall develop and implement a research security plan to safeguard, and mitigate the risk of harm to or interference with, its research activities.**

#### **Minister's directive**

**(3) The Minister may, from time to time, in a directive issued to one or more colleges or universities described in subsection (1),**  
**(a) developed and implemented under subsection (2);**  
**(b) specify the date by which a plan must be provided to the Minister under subsection (4) and any requirements relating to updating or revising a plan; and**  
**(c) specify topics to be addressed or elements to be included in a plan and the date by which they must be addressed.**

With respect to *Bill 33*'s proposed "Research Security Plans", we are disappointed with the Ontario Government's repeated reliance on Ministerial Directives. These Directives are not subject to the same scrutiny as other legal instruments, with the Ministry's recent reliance on Directives bordering on being anti-democratic.

Our elected officials don't get an opportunity to debate these Directives, with the result that these Directives would only give the government further unchecked authority. This interference with PSE research poses a threat to academic freedom and could stifle an already world-class network of institutions producing cutting-edge research.

Autonomy for all higher learning institutions, must apply equally to their work in research and their teaching responsibilities. These are the two pillars that must be supported so that

each Ontario college and university can continue to function properly as centers of free inquiry, enabling them to pursue knowledge and serve society. Ministerial Directives related to research erodes the credibility of institutions which will have a deleterious effect on the quality of the learning experience for all students.

We have all been front-row witnesses to the disastrous impact of political interference in American colleges and universities. Research projects have had to be abandoned due to ideological reasons and the cutting off of government funding. Ontario has benefitted by the political turmoil in the higher learning sector in the United States, as described in the following March 29, 2025, article from the Economic Times associated with the India Times: [3 esteemed Yale professors flee to Canadas over Trump concerns](#)

Three high-profile Yale professors—philosopher Jason Stanley and historians Timothy Snyder and Marci Shore—are leaving the university and the United States to join the University of Toronto’s Munk School of Global Affairs and Public Policy starting in fall 2025. Their departures, driven by concerns over America’s political climate and academic freedom, mark a significant loss for Yale and highlight growing anxieties about higher education under pressure from partisan attacks.

### **Why Three Yale Professors Are Leaving the U.S**

Stanley cited Columbia University’s recent concessions to Trump-era policies as a tipping point. He expressed frustration over Columbia’s decision to overhaul protest rules and accept external oversight under federal pressure, calling it a “losing strategy” that prioritized survival over solidarity. Stanley worried other universities would follow suit, undermining academic independence. Snyder and Shore, who specialize in Eastern European history and have drawn parallels between fascist regimes and modern U.S. politics, emphasized personal and family reasons for relocating. However, colleagues noted their longstanding critiques of Trump’s policies and growing discomfort with America’s direction influenced their choice.

The trio’s exit follows years of tension. Snyder and Shore had reportedly been courted by the Munk School for years, but recent political shifts accelerated their decision. Shore hinted that the November 2024 elections and fears of democratic erosion played a role, calling the climate an “American descent into fascism.” Stanley, known for his bestselling book *How Fascism Works*, warned that universities are failing to protect students and faculty from government overreach.

Should *Bill 33* become legislation and implemented, as it is currently written, Ontario risks becoming a jurisdiction that will be seen as regressive, afraid of science, and hostile to the free exchange of ideas, truth, and peer-reviewed research.

Ontario will no longer be a safe oasis to welcome the “best of the best” in the world in our higher learning institutions and Ontario may rather become a net exporter of highly educated researchers to other countries.

Choices have consequences. OSSTF/FEESO hopes the government will understand the significant risks to our shared economic and community interests should the government continue in this anti-democratic direction. It is not too late to choose a more welcoming pathway for all Ontarians.

**OSSTF/FEESO is proposing the following amendments to *Bill 33*:**

**1. Accountability and Transparency**

Amendment by addition of a new Section: Creation of Central Public Database for School Board Reports.

**Purpose**

To enhance transparency and accountability by establishing a central, public, searchable database for reports concerning school boards.

Amendment by the addition of the following to *Bill 33* and the Education Act whereby:

- (a) The Ministry of Education shall create and maintain a central, public, searchable database that includes all reports related to school boards that have been subject to:
  - Performance reviews
  - Financial audits
  - Governance investigations
  - Policy compliance checks
  - Provincial supervision
- (b) The database shall be accessible from the Ministry of Education website, available to the public and shall include:
  - The name of the school board
  - The date of the report
  - A summary of findings
  - Recommendations made in the report
  - Actions taken in response to the report
- (c) The Ministry of Education shall ensure that the database is updated regularly and that all new reports are added within 30 days of their completion.
- (d) The Ministry of Education shall establish guidelines and standards for the format and content of reports to ensure consistency and clarity.
- (e) Funding for the creation and maintenance of the database shall be allocated from the Ministry's budget or through additional funding as deemed necessary.

**Implementation**

This amendment shall come into force on the day the *Supporting Children and Students Act, 2025* receives Royal Assent.

**2. Safety and Rights**

New Section: Inclusion of Social Workers and Child and Youth Workers in School Resource Officer Programs

## **Purpose**

To ensure that School Resource Officer (SRO) programs include comprehensive support for students by mandating that every publicly funded school board hire permanent social workers and child and youth workers at every public school that has a current or establishes a new form of a School Resource Officer program in the province of Ontario.

Amendment by addition to *Bill 33* whereby:

- (a) Any School Resource Officer (SRO) program implemented within schools shall include the permanent, school board employment of at least one licensed social worker and one certified child and youth worker at any school that has, or implements, an SRO program.
- (b) The roles of the social worker and child and youth worker shall include, but not be limited to:
  - Providing mental health support and services to students.
  - Assisting in the development and implementation of individualized support plans for students in need.
  - Collaborating with school staff, parents, and community organizations to address the social and emotional needs of students.
  - Conducting workshops and training sessions for students and staff on topics including, but not limited to, mental health awareness, conflict resolution, and crisis intervention.
- (c) Additional funding for the employment of social workers and child and youth workers shall be provided to every school board that has an existing, or implements a new SRO program, as part of the Core Education Funding or through additional funding as deemed necessary by the Ministry of Education.

## **Implementation**

This amendment shall come into force on the day the *Supporting Children and Students Act, 2025* receives Royal Assent.

### **3. Ministry of Colleges, Universities, Research Excellence and Security**

Amendments to *Bill 33*, Schedule 3 *Legislation Act, 2006*

Regulations; fees

## **Purpose**

To ensure Ontario's colleges and universities receive the highest per-pupil funding and lowest student fees in the nation, thereby enhancing the quality of and access to post-secondary education and supporting student success.

### **Amendment by addition**

(3) Without limiting the generality of subsection (1), a regulation made under that subsection may,

- (a) increase per pupil funding for colleges and universities to ensure Ontario becomes and remains the highest funded province in the nation
- (b) funding increase shall be calculated based on the most recent national data on per pupil funding for post-secondary institutions
- (c) The Minister of Colleges, Universities, Research Excellence shall review and adjust the funding annually to maintain Ontario's status as the highest funded province
- (d) The increased funding shall be allocated to:
  - Enhancing academic programs and resources
  - Improving campus facilities and infrastructure
  - Expanding student support services, including mental health and career counseling
  - Supporting research and innovation initiatives

### **Implementation**

This amended Schedule shall come into force on a day to be named by an order of the Lieutenant Governor in Council.

### **Conclusion**

OSSTF/FEESO believes that its submissions, as they relate to the K to 12 and the PSE sectors, are reasonable and supported by evidence. We thank the government for the opportunity to receive our written submissions and we hope that the government considers its content in its deliberation to pass legislation that better supports students, communities, and workers and educational institutions that are key to the economic growth of Ontario.

OSSTF/FEESAO is ready to engage in meaningful discussions with the government and other key stakeholders to find solutions that will strengthen accountability and transparency of school boards and universities while investing the needed funds so that proper resources, both material and qualified personnel, can be directed where they are needed for the best interests of students, staff, and their communities.

Equally important is the need for the government to provide increased investments to the post-secondary education system that will ensure the sustainability and growth of each institution to be able to do their work in a manner that recognizes their autonomy and values the important contributions they make to the democratic fabric of our society. Without investments, fewer students will be able to access quality post-secondary education programs.

Every school board and post-secondary institution has an obligation to be fiscally responsible and publicly accountable for how they allocate their resources. There are already measures in place to do that and *Bill 33* is an overreach by the government. The government has an equal obligation to invest the needed resources so that the entire education system, from kindergarten to the post-secondary can thrive, and not just survive; to address and overcome the maelstrom of challenges we all face during these turbulent times.

OSSTF/FEESO calls on the Ford government to reconsider this undemocratic legislation and meet with all key stakeholders to prepare needed legislation that respects local democracy, the institutional autonomy in the post-secondary education sector, the need for equity and inclusion, and the rights of students and all education workers, from kindergarten to the post-secondary can learn and work in safe and supportive environments.