



Submission to the Ministry of Education on the Draft P/PM on *Concussion Prevention, Identification and Management*

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) welcomes the opportunity to provide comment on the draft P/PM providing direction and outlining expectations for school boards on this important issue.

OSSTF/FEESO is a diverse union representing 60,000 educational workers from across the province of Ontario. OSSTF/FEESO's 140 bargaining units represent both English and French members in elementary and secondary school workplaces, private schools, consortia offering support services to school boards and universities.

In November 2011, correspondence was sent to Ministers of Children and Youth Services, Education and Health, regarding OSSTF/FEESO's concerns about the lack of knowledge about concussions. OSSTF/FEESO requested that the issue be added for discussion to the agenda of the Healthy Schools Working Table. We requested "future action regarding the issue of concussions and head injuries."

In March 2012, Ministers Broten and Matthews introduced legislation "aimed at protecting student athletes." OSSTF/FEESO believes that the incidence of concussions occur not only in sports related activities but in all areas of daily school activities. It is just as important for the staff supporting a Full Day Early Learning setting as is aware as the coach of a secondary school senior boys' football team.

OSSTF/FEESO welcomes the intent of the draft P/PM on *Concussion Prevention, Identification and Management*. We support the efforts to continue to raise awareness about concussions and to outline expectations for school boards.

OSSTF/FEESO believes that employers should develop, in consultation with the Federation, school board policies and procedures, which are based on the most recent research, to deal appropriately with head injuries and concussions. OSSTF/FEESO also believes that school boards should be responsible for developing and delivering up-to-date training for all staff members to help them understand the seriousness of concussions and head injuries, to recognize and appropriately respond to head injuries and concussions, and to provide all required resources for the appropriate accommodations, when necessary, for individuals with concussions and/or head injuries.



Finally, OSSTF/FEESO believes that all training related to these policies and procedures dealing with head injuries and concussions should be offered during the regular workday. Similar practices such as the training requirements of *Sabrina's Law* would be beneficial for all school board staff.

The P/PM references the concussion protocol as part of the Ontario Physical Education Safety Guidelines. Training is described as “a plan to ensure relevant school board employees and school volunteers receive regular and ongoing training on concussion prevention, identification and management.” OSSTF/FEESO wishes to stress that every school board employee be provided with some level of training, not a limited number of “relevant” school board employees. A Junior Kindergarten student who falls off of a playground swing is just as likely to suffer a concussion as a drama student who falls off a school stage during a play. Concussions are not limited to sports related activities and all staff must have a level of awareness about head injuries.

In preparation for this submission, the Ophea modules have been reviewed. OSSTF/FEESO applauds that each module provides detailed information for teachers and educational workers to consider when having students participate in a significant number of activities. While each module provides good information, some of the recommended resources may present challenging. For example, during a cross-country running event, the site indicates a “fully stocked first aid kit must be readily accessible” in addition to “a working communication device (e.g., cell phone) must be accessible.” OSSTF/FEESO would hope that the Ministry of Education ensures that members are provided with these recommended requirements.

The proposed P/PM encourages boards to consult with “other education partners” in developing board policy. Consultation with the local boards of health is also encouraged. The new policy is to be implemented by the start of the 2014-2015 school year. With this partnership, and with the support of training resources to raise awareness about concussions and head injuries, OSSTF/FEESO believes this is achievable.

While OSSTF/FEESO applauds the intent of the P/PM, the establishment of policies requiring training and the availability of the web portal, there is a question whether funding for the provision of necessary equipment and materials as recommended in the Ophea website will be available for every school in Ontario. Parents should expect appropriate safety precautions and equipment should be available for students.

In January 2013, the government of Ontario announced funding to re-open and expand the Safe Welcome program for all elementary schools across the province to access funds to lock their front doors. The Ministry offered to provide \$3,100 per elementary school to allow boards to purchase security access devices and pay for their installation.

A similar funding announcement should be considered for every elementary and secondary school to provide for the purchase of cell phones, first aid kits and other resources as recommended in the Ophea modules. OSSTF/FEESO believes that the likelihood that a student will suffer a head injury or concussion in a school or at a school-related event is far greater than the potential danger of an unwanted intruder entering a building. The Government of Ontario should consider adequate funding to provide the required resources when responding to this concern as it relates to student safety, health and wellbeing.

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