



ETFO Submission to the Ministry of Education

2025-26 Education Funding Feedback

November 2024

Elementary Teachers' Federation of Ontario
Fédération des enseignantes et des enseignants de l'élémentaire de l'Ontario

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ETFO represents 83,000 elementary public school teachers, occasional teachers, designated early childhood educators, education support personnel and professional support personnel across the province. Its Building Better Schools education agenda can be viewed at **BuildingBetterSchools.ca**.

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INTRODUCTION

The Elementary Teachers' Federation of Ontario (ETFO) represents approximately 83,000 public elementary school teachers, occasional teachers, designated early childhood educators, education support personnel and professional support personnel across the province and is the largest teacher union in Canada. ETFO is an important stakeholder in the public education system and appreciates the opportunity to participate in the Ministry of Education's consultations on education funding for the 2025-26 school year.

Over the past six years, Ontario's public education system has experienced a significant decrease in per-student funding while at the same time facing unprecedented challenges, including a once-in-a-generation pandemic and the resulting impact on student learning and well-being. The chronic underfunding of public education, the disruptions to in-person learning during the COVID-19 pandemic, and the lack of adequate resources during the post-pandemic recovery period have impacted everyone in the education system but have disproportionately impacted individuals and families from marginalized communities, including Black, Indigenous, racialized, disabled, and low-income communities. To alleviate these inequitable burdens and build a more just and equitable province, Ontario must invest in public education.

The reduction in education funding in real dollars has exacerbated pre-existing challenges such as large class sizes, the poor physical condition of schools, insufficient and inequitable access to in-school supports, and the lack of sufficient resources to meet the needs of all students – particularly students with special needs, English language learners, and those from marginalized communities. Yet, the government continues to ignore these serious challenges facing students and educators. This cannot continue.

Ontario's current fiscal position provides an opportunity to adequately fund public services and reinstate the funding that has been cut from public education over the past six years. The government must make the

necessary investments to provide educators, students, families, and communities with the supports they need.

The Ministry of Education is seeking feedback on the implementation of the Core Education funding model, special education funding, finding efficiencies and reducing administrative burden, community use of schools, the Urban and Priority High Schools Program (UPHS), and the Safe and Accepting Schools component. A closer look at the 2025-26 education funding engagement consultation guide reveals a common thread: the Ministry is not interested in the impact of ongoing funding cuts, or where investments are needed most. This year's guide makes it clear that under the current government, the Ministry continues its misguided search for so-called "efficiencies" and the further reduction of "administrative burden." In other words, the Ministry continues to seek opportunities to cut funding and is willing to further reduce accountability and transparency within our public education system.

While stakeholders are invited to provide feedback on topics not included in its consultation guide, the Ministry has missed yet another opportunity to tackle the most significant challenge to public education in Ontario today; namely, the ongoing underfunding of public education.

In this submission, ETFO addresses some of the relevant themes included in the Ministry's consultation guide. ETFO also puts forward recommendations that address other important aspects of Ontario's public education system. It is ETFO's hope that the government seriously considers these recommendations and begins to allocate the necessary resources to undo the damage caused by years of funding cuts. Ontario students deserve a high-quality, equitable, inclusive public education system. Investment in this world-class system is the key to the province's social and economic success.

Core Education Funding Model Reform

On April 26, 2024, the government released education funding details for 2024-25. These included the announcement of significant restructuring of existing education funding, with the introduction of Core Education funding to replace the former Grants for Student Needs (GSN), and Responsive Education Programs (REP) funding to replace the former Priorities and Partnership Funding (PPF).

Total Core Education funding is projected to be \$28.6 billion in 2024-25, compared to an equivalent \$27.9 billion in GSN funding in 2023-24. On a per-student basis, Core Education funding for 2024-25 is projected to be \$13,852 compared to \$13,599 in GSN funding in 2023-24. With an average inflation rate of 2.9 per cent between March 2023 and March 2024, this represents an overall reduction in education funding of approximately \$294 million, equivalent to 1.0 per cent lower than in 2023-24.

Compared to 2018-19, when the current government was first elected, per-student funding has decreased by approximately \$1,500 per student in real dollars.¹ In 2024-25, this represents more than \$3 billion withdrawn from Ontario’s public schools. If the government can find \$3.2 billion to provide every Ontarian, regardless of income level, a \$200 cheque on the eve of an increasingly likely early election, the government could surely find \$3 billion to begin to undo the damage it has done to our public education system.

The introduction of Core Education funding to replace the GSN represents a major restructuring of the funding formula. These changes were made without meaningful consultation with ETFO and other

¹ R. Tranjan (2024). Ontario’s Core Education Funding has dropped by \$1,500 per student since 2018. *The Monitor*. Canadian Centre for Policy Alternatives. monitormag.ca/articles/ontarios-core-education-funding-has-dropped-by-1-500-per-student-since-2018/

important education stakeholders. The rearrangement of grants into different funding pillars does not come anywhere close to the independent review of the education funding formula that ETFO and other education stakeholders have long called for. The government should establish an independent, external review of Ontario’s education funding formula to ensure it adequately addresses students’ needs.

Streamlining the funding formula

In the *Technical Guide for School Boards 2024-25*, the Ministry states that it recognizes that school boards need flexibility to decide how best to allocate resources within their budgets, but at the same time, there are restrictions on how school boards may use certain components of their allocation.

While the stated intention behind the Core Education funding model is to simplify and strengthen accountability, the initial implementation has presented challenges. The new enveloping framework and limitations on funding for specific areas (like transportation and facilities) have created complexities in budget allocation and resource management, leading to difficult decisions regarding service reductions and loss of staff in schools. The new framework has reportedly led to staffing reductions, particularly in areas like teacher-librarians, that can negatively impact student learning experiences and access to essential support services. The new framework may also limit the ability of school boards to address critical teaching needs for students and to maintain safe and adequate learning environments, further exacerbating funding pressures in the education system, particularly for boards with aging infrastructure.

A glaring example of the impacts of both chronic underfunding and the new enveloping framework is the recent school transportation crisis in Renfrew County. Although the overall cost of operating school buses in Renfrew County has increased between 30 and 70 per cent since the onset of the COVID-19 pandemic, the Transportation Consortium in Renfrew County maintained it was unable to offer more than a 12 per cent increase to school bus operators without the school board being required to make funding cuts elsewhere.

This led to a bussing dispute in Renfrew County that left students without any bussing at all for almost two months at the start of the school year. This is simply unacceptable. Unless the government increases funding allocations for school transportation and works with education stakeholders to implement an adequate funding framework, situations like this will continue to arise in other parts of the province.

It is crucial for the Ministry of Education to consider these impacts and explore potential adjustments to the funding model to ensure that school boards have the necessary financial resources to operate effectively and support student success.

Strengthening school board accountability

While the government’s stated goal to improve accountability and transparency is commendable, the accompanying single-track drive to reduce so-called “administrative burden” has had the opposite effect of decreasing transparency and accountability within the public education system. The Ministry’s expenditure estimates provide higher-level budget reporting than in the past. This means fewer details are accessible to the public about specific expenses and amounts in the Educational Finance Information System (EFIS). So, while on one hand, the government talks about accountability and transparency, on the other hand it is reducing the information that school boards have to provide on how education funding is being spent.

If the government wanted to improve school board accountability, it could do so by increasing transparency, community engagement, and independent auditing of school boards. The government should increase the level of detail in the reports released through EFIS, including expenditure breakdowns and comparisons across school boards. Regular, meaningful consultations should be held with education workers, stakeholders, parents, students, and community members to gather feedback that would be considered seriously in making positive changes to the education system. Periodic independent audits of school board finances would ensure compliance and effective resource utilization.

While the overall allocation of grants remains relatively unchanged in the new funding pillars, the change in enveloping criteria impacts various programs. These impacts will not be fully known for some time. As school boards adjust their budgetary processes to fit within the new funding structures, the impact on programs at the school board level will become clearer.

To fully evaluate the impact of the implementation of the Core Education funding model, detailed data that outlines school board expenditures versus funding allocations (as previously required in Data forms B, C and D, in EFIS) is needed. The government should reinstate the requirement for Data forms B, C and D in the EFIS estimates reporting cycle.

The Core Education funding model represents a significant shift in education funding in Ontario. Continuous monitoring, evaluation, meaningful consultation, and adjustments are necessary to ensure that the funding model effectively supports students and educators.

Recommendations:

1. Establish an independent, external review of Ontario’s education funding formula to ensure it addresses actual student needs.
2. Increase public education funding to 2018-19 levels, accounting for inflation.
3. Reinststate the requirement for Data forms B, C and D in the EFIS estimates reporting cycle.

Special Education Funding

Students with special education needs are not getting the front-line supports and services they need.

Inadequate supports have a more significant impact on students who face additional barriers, such as Black, Indigenous, and racialized students, students from disadvantaged socio-economic backgrounds, and those who are English language learners. These students need access to educational assistants, behavioural

counsellors, child and youth workers, psychologists, and speech and language pathologists in school to help them learn and thrive.

Meeting the special education needs of students is a constant challenge for any government. A substantial portion of existing special education funding is currently based on a predictive statistical model tied to overall enrolment numbers. Unfortunately, this model fails to account for the increased participation in special education programs and services that Ontario’s public schools have experienced over the past several years. It also fails to account for the differences in needs among students requiring special education supports. For example, the current funding formula treats a student who may require support from a resource teacher for occasional withdrawal to complete their work similarly to a student with more significant needs. Special education funding must be based upon the actual needs of students.

In its consultation guide, the Ministry asks if there are more effective or efficient ways to allocate resources without the need for new provincial funding or without increasing administrative burden. There are two major problems with this approach. First, the government is simply not allocating sufficient funding to meet the needs of students, and no variation on how that funding is allocated is going to make up for the shortfall created by years of chronic underfunding. Second, the obsession this government has with reducing so-called “administrative burden” undermines the effective allocation of special education funding.

To support students with special education needs in a meaningful way, resources must be responsive to students’ needs. This means that the timely assessment of those needs, and the allocation of adequate resources that meet those needs, must be central to how special education funding is administered. This is entirely incompatible with the current approach from the government, which continues to use an outdated statistical model to allocate most special education funding and has moved to further decouple the

relationship between funding and student need, as it did recently with the changes to the Special Incidence Portion (SIP) and Special Equipment Amount (SEA).

In 2013-14, special education programs or services were provided to 340,562 students, representing 16.3 per cent of all students. By 2022-23, this number had increased to approximately 358,000 students representing 17.5 per cent. Special education funding has not kept up with inflationary costs or with students' increasing need for special education supports. The government must increase special education funding to address this funding gap and ensure that special education grants are based on the actual education needs of students.

Creating inclusive and supportive learning environments for students with special needs also requires that occasional teachers and occasional education workers receive paid professional learning on teaching and educational strategies to support these students without the benefit of day-to-day knowledge of the student and an ongoing rapport.

Recommendations:

4. Base special education grants on actual student needs.
5. Allocate funding to school boards for the hiring of additional educational assistants, psychologists, behavioural therapists, child and youth workers, school support counsellors, and speech and language pathologists.
6. Allocate funding to provide occasional teachers and occasional education workers paid professional learning on teaching and educational strategies to support students with special education needs.

Early Reading Screening

In July 2023, the government announced that it would require school boards to implement an Early Reading Screening (ERS) in response to the *Right to Read* inquiry report by the Ontario Human Rights Commission (OHRC). The implementation of the ERS for students in Year 2 Kindergarten, Grade 1 and Grade 2 this fall has not been successful. In many cases, teachers were not adequately trained to administer the screener to

students. The funding allocated by the government to hire ERS specialist teachers was not sufficient to provide the necessary coverage for classroom teachers to administer the first early reading screener in the fall. In addition, significantly more students than anticipated failed to meet the threshold requirement of the first screening. As a result, the funding currently allocated falls well short of what is required to ensure students receive Tier 2 and Tier 3 literacy interventions.

Recommendations:

7. Increase funding to school boards to hire additional ERS specialist teachers to address increasing student need.

Efficiencies and Reducing Administrative Burden

The public education system has been severely strained by an inadequate funding formula implemented almost 25 years ago coupled with misguided funding cuts by consecutive governments. While efficient program implementation should be a goal shared by all education stakeholders, over the past six years the push to find efficiencies and reduce administrative burden has come at the cost of damaging funding cuts and a loss of accountability on how education funds are spent.

No amount of searching for efficiencies can offset the billions of dollars that have been cut from public education over the past six years, and the significant funding gap that has been identified by the Financial Accountability Office (FAO) for the years ahead. The Ministry of Education should shift its focus away from trying to find savings where little or none remain and towards prioritizing the investments needed to maintain Ontario’s internationally renowned public education system.

There are a few areas where the government can help streamline school board data collection by making some targeted investments or redirect existing funding into school-based supports.

Online incident reporting

Accurate reporting of workplace violence, the timely provision of information to joint health and safety committees, and adequate analysis by the Ministry of Education of safe school incident and workplace violence reports continue to be ongoing concerns in the education sector. They are also critical to creating healthy and safe schools and supporting students.

Many educators experience workplace violence daily, if not more frequently. Fulfilling their reporting responsibilities takes considerable time, particularly when a single incident requires multiple reports. Online reporting systems were intended to streamline reporting and facilitate the necessary communication of reports to joint health and safety committees, as well as the Ministry of Education. The government provided a small amount of funding for school boards to consolidate safe school incident and workplace violence reports in online reporting systems. Unfortunately, boards selected the services of a variety of software providers for implementation, resulting in very different user experiences across the province and, significantly, inconsistent data collection. Not all school boards include illness/injury reports in their incident reporting system, and many boards are still not meeting Ministry requirements.

Funding for a standardized, province-wide incident reporting system is needed to simplify the process for education workers, to facilitate information required by joint health and safety committees, and to support adequate data collection for analysis and action by the provincial government.

Recommendation:

8. Provide funding for a provincial standardized online incident reporting system for all school boards to use for reporting injuries and illness, safe school incidents, exclusions, and workplace violence.

Education Quality and Accountability Office (EQAO)

ETFO has consistently raised concerns about how Education Quality and Accountability Office (EQAO) assessments, first administered in 1997, have negatively affected elementary classrooms with their overly narrow focus on literacy and numeracy, to the detriment of more holistic programming. EQAO promotes a test-driven school culture through the myriad diagnostic assessments the Ministry of Education and school boards have imposed on classrooms as part of the drive to improve provincial test results.

The tests and the preparation they require consume considerable classroom time and create stress for students and their teachers. This is particularly concerning for students in Grade 3. Other jurisdictions (e.g., England, Singapore, and New Zealand) are moving away from mandatory standardized testing at an early age to avoid a negative impact on students. Given that EQAO assessments provide no data that can be used to inform daily instruction and student learning throughout the year, it seems unnecessary to continue the Grade 3 assessment.

EQAO assessments also fail to measure more complex skills required for problem-solving and innovation, lead to “teaching to the test,” demotivate students, and are misused to rank schools. In 2022, the Ministry of Education allocated more than \$28 million to EQAO. ETFO believes these funds should be reallocated to improve student learning conditions; for example, reducing class sizes or providing more supports for students with special needs.

Recommendation:

9. Cancel EQAO assessments and reallocate EQAO funding to improve student learning conditions.

Student Safety and Well-Being

Safe and accepting schools

The Safe and Accepting Schools component provides funding for non-teaching staff (child and youth workers, social workers, educational assistants, and attendance counsellors) to work with students who are at risk of suspension or expulsion (risk factors include mental health/family challenges or living in precarious housing). In 2020-21, the Ministry ended suspensions for Ontario’s youngest students – those in Kindergarten to Grade 3 – but that did not end violence and safe school incidents among this demographic. It did, however, end a source of data. Adequate and consistent data collection is necessary to ensure the proper supports are in place to prevent these incidents. The Ministry of Education has also requested that school boards submit data on school exclusions but is not collecting demographic data.

Mental health supports

ETFO has repeatedly stated that the mental health of teachers, education workers, and students requires the urgent attention of the provincial government. In May 2021, ETFO shared research that showed many of its members experienced burnout and other negative mental health impacts linked to the provincial government’s failed response to COVID-19. The government’s chronic underfunding of public education has led to unnecessary negative mental health impacts and outcomes for ETFO members and students.

The lack of support in the classroom leads to more suspensions. This in turn leads to more money being spent on programming to support the academic and non-academic needs of students who have been expelled or are on long-term suspensions. Putting the additional resources that have been stripped from the education system back would ultimately mean suspensions and expulsions could be prevented.

In April 2024, the Ministry issued an update to Policy/Program Memorandum 128 regarding the provincial code of conduct and school board codes of conduct. The updates focused on restricting the use of cell phones and vaping in schools. While ETFO supports these steps to reduce distractions in schools, the government failed to properly consult with ETFO during the revision process, as had been agreed to in the 2022-2026 ETFO Teacher/Occasional Teacher Central Agreement, and failed to address student conduct and consequences in order to ensure safe learning and teaching environments.

In July 2023, the Ministry issued Policy/Program Memorandum 169 on student mental health and, more recently, released a memo to school boards about new Grade 7 and 8 mental health literacy modules. ETFO supports the government's stated commitment "to provide culturally responsive, evidence-informed student mental health promotion, prevention and early intervention services that respects students as complex individuals and provide appropriate support for their diverse needs," but this commitment must come with funding for the supports in schools and in the community that are necessary to ensure students' developmental, emotional, and behavioural needs are met.

In its 2024 report *Access to Special Education in Ontario Schools: The Gaps and Challenges*,² People for Education reported that:

- on average per school, 16% of elementary students receive some form of special education support, a proportion that has remained relatively steady over the last decade
- on average, the ratio of special education students to special education teachers is 39 to 1 in elementary schools

² People for Education (2024). *Access to Special Education in Ontario Schools: The Gaps and Challenges*. peopleforeducation.ca/wp-content/uploads/2024/05/Access-to-Special-Education-In-Schools_3June.pdf

- 84% of elementary schools have at least one full-time educational assistant. This has been a steady decline since 2019-20 when 89% of elementary schools had at least one full-time educational assistant
- only 26% of elementary schools reported they had regularly scheduled access to psychologists
- the percentage of elementary schools reporting they have no access to psychologists has increased steadily, from 13% in 2016-17 to 24% in 2023-24

Additional funding must be provided to improve access to culturally relevant in-school supports, including guidance counsellors and social workers, especially in underserved areas. Supporting students' emotional, developmental, and behavioural needs is critical so that ETFO members can focus on supporting students' learning.

Recommendations:

10. Provide additional funding to improve access to culturally relevant in-school supports, including guidance counsellors and social workers, especially in underserved areas.
11. Allocate funding for additional in-school and community supports necessary to ensure students' developmental and behavioural needs are met.
12. Develop and deliver – in consultation with mental health experts, teachers, education workers, unions, and other education stakeholders – long-term, fully funded, comprehensive, culturally responsive mental health supports for students.
13. Allocate ongoing, sustainable funding for high-quality professional learning for educators in student mental health, to take place within the instructional day.

Class Size

Larger classes mean less one-to-one support for each student. This disproportionately impacts students with special needs. Front-line educators identify small classes as the most important factor in their ability to work individually with students and meet their diverse needs. Smaller classes improve student behaviour and peer relationships and increase student engagement in the early grades. Investing in smaller classes and increased one-to-one support would help alleviate disruptive behaviours and contribute to the reduction of incidents of classroom violence.

Class size has been extensively studied. A 2014 US-based review of the research concludes: “The academic literature strongly supports the common-sense notion that class size is an important determinant of student outcomes.”³ A 2018 study of the California class-size reduction program – the largest in US history dating back to the late 1990s – found smaller classes in public schools resulted in lower private school participation and higher enrolment in public schools, which in turn brought increased funding, improving the quality of public education.⁴

Ontario’s previous investments in smaller classes in primary grades have had a positive impact on our classrooms. Ontario-based research demonstrates that smaller primary classes have enabled teachers to provide more individual attention to students and use a greater variety of instructional strategies. Currently, primary grades are funded for an average class size of 20 and secondary grades for an average class size of 23. By comparison, funding for grades 4 to 8 supports a class size average of 24.5. As Ontario seeks to address existing learning gaps, reducing class sizes is a necessary first step.

Establishing limits on class size averages alone without hard caps means that individual classes can vary a great deal. Unlike in the primary grades, there are currently no caps on class size for grades 4 to 8. This has resulted in the largest class sizes in the system, often with more than 30 students in a class.

This imbalance creates learning environments that are not supportive of students’ individual learning needs, making it difficult for educators to provide the high-quality learning opportunities students need. The

³ Schanzenback, D.W. (2014). *Does Class Size Matter?* National Education Policy Centre.

⁴ Gilraine, Michael, Macartney, H. and McMillan, R. (2018). *Education Reform in General Equilibrium: Evidence from California’s Class Reduction*. National Bureau of Economic Research.

benefits of the smaller classes we have seen in primary grades need to be extended to grades 4 to 8. The government should cap class size for grades 4 to 8 at 24 students.

Class size is also an issue in Ontario's Full-Day Kindergarten program. This program has proven to be very successful and has become a model for other jurisdictions and a fundamental part of our world-class education system. The Kindergarten program is funded to have an average class size of 26 and an average staff-child ratio of 1:13. There are still, however, many classes with over 30 students and an even greater number of Kindergarten/Grade 1 split-grade classes, which are not supported by a designated early childhood educator.

ETFO members consistently raise concerns about the challenges of setting up activity-based programs for large numbers of young children and managing classroom behaviour when many of the students are experiencing formalized learning environments for the first time. Overcrowded and often noisy classrooms or open "pods" create stressful work and learning environments and limit teachers' and early childhood educators' ability to take full advantage of the play-based program. The government should cap Kindergarten class size at 26 students.

Recommendations:

14. Cap grades 4 to 8 class size at 24 students.
15. Cap Kindergarten class size at 26 students.
16. Ensure every Kindergarten class is staffed with a full-time certified teacher and a designated early childhood educator.

Addressing Violence in Schools

In February and March 2023, ETFO commissioned national research firm Strategic Communications (Stratcom) to conduct a survey of its members about their experiences of workplace violence.⁵ Almost 25,000 ETFO members responded to the survey. An alarming 77 per cent of members said they had personally experienced violence or witnessed violence against another staff member in the 2022–2023 school year. Four out of five members stated there are more incidents of violence in schools now than when they started working in the Ontario public elementary school system. Two-thirds of members said the severity of violent incidents has increased and 72 per cent said the number of incidents has increased just since the beginning of the COVID-19 pandemic.

Forty-two per cent of members have suffered a physical injury, illness, and/or psychological injury/illness as a result of workplace violence against them during the last school year. Approximately 30 per cent of ETFO members' injuries warranted a Workplace Safety and Insurance Board (WSIB) claim, although those claims were not always submitted, for a variety of reasons.

Increasing violence leads to an increasing number of traumatic mental stress claims, chronic mental stress claims, and physical lost-time injuries. The data shows that many injuries are under-reported. This should be cause for financial concern since preventing injury and illness is proven to be cost-effective. Whether workers are using WSIB, long-term disability, or sick leave, this is an expensive problem the government

⁵ StratCom (2023). *2023 Workplace Violence Survey. The Elementary Teachers' Federation of Ontario.*
etfo.ca/getmedia/78cffcdd-8e6f-4703-a8d1-9ef03ad97a5f/230602-ETFO_2023-Workplace-Violence-Survey-report-CONDENSED-rev2-appendix-B.pdf

should address proactively. The health and safety of teachers and education workers should not be collateral damage as the public education system is starved of funding.

Learning is being disrupted and violence is being normalized in schools because the system is suffering from chronic underfunding, under-resourcing, and understaffing; creating environments where student needs are going unmet.

Funding to ensure availability of front-line supports

Front-line supports are often not available to educators and students. A majority of ETFO members reported that educational assistants (61 per cent), social workers (56 per cent), and child and youth workers (53 per cent) were available only “some of the time,” “rarely,” or “never” when needed in the 2022-23 school year.

ETFO supports Ontario’s integrated model for education, which means that students, whenever possible, should be learning together with their same-age peers regardless of their needs. This, however, requires full funding and full support. The government should not look at inclusion as a way to cut costs. They must provide adequate funding for staffing, training, and resources.

Students who are struggling, and especially students with special education needs, have been chronically underserved by the government. School boards are not getting adequate funding to ensure students get access to timely assessments and front-line support workers. Providing funding to meet the actual needs of all students is, at its core, a human rights issue. Being understaffed and under-resourced adversely impacts students' access to education and is contributing to the rise in incidents and the severity of violence in schools.

Across the province last year, ETFO members reported that positions were not filled due to absences – and many of those staff have responsibilities set out in safety plans. Without contingency plans in place for trained replacement staff, safety plans cannot be implemented and sometimes students are temporarily excluded from school until supports are in place. This, again, adversely impacts students' access to education and could be avoided with adequate staffing, appropriate safety protections, and adequate pay to help ensure that jobs do not go unfilled.

Adequate replacement staff and funding also needs to be provided to ensure workers are provided with release time from class (or time in lieu) to complete reports or attend safety related meetings (e.g., safety plan updates, debriefing, etc.). More than one in five ETFO members who did not complete reports indicated that it was because they did not have the time. Fulfilling reporting responsibilities takes considerable time, particularly when there are follow-up questions to investigate the root causes of an incident with an aim for prevention.

Recommendation:

17. Provide adequate funding to school boards to ensure availability of appropriately trained staff to fill absences regularly, due to illness, or for following up on violent incidents.

Funding to support the work of the Provincial Working Group on Health and Safety

In order to adequately resource school boards in providing training to administrators and staff, the government needs to provide support for the work of the Provincial Working Group on Health and Safety (PWGHS). Historically, this group has provided the opportunity for the input of all public education sector stakeholders to be considered during the development of resources. To fulfil its mandate, the PWGHS needs the availability of staff in the Ministry of Education and Ministry of Labour, Immigration, Training and Skills Development for meetings and sub-committee meetings, and to ensure work is completed between

meetings. The number of meetings should go beyond the minimum number currently outlined in the terms of reference and should not be interrupted due to collective bargaining, since staff and students continue to be impacted by workplace violence. The Ministry of Education needs to allocate funding to ensure staff are dedicated to dealing with health and safety in the K-12 education sector, particularly in addressing workplace violence.

Smaller school boards particularly appreciate the resources created by the PWGHS. Developing the resources centrally is a more efficient use of time and resources, allows for the proper vetting, and ensures consistent expectations and training are provided. These resources are then provided to school boards for further input on implementation through local joint health and safety committees to ensure the training reflects the local structure and practices.

The training and resources for administrators should include, but not be limited, to an overview of legal responsibilities related to incident reporting, immediately responding to incidents, consulting and debriefing with staff, creating and updating safety plans and risk assessments, and notifying staff of the risk of violence.

To inform this work, the PWGHS also needs to analyze data collected from school boards and examples of best practices. Collaboration on a standardized, province-wide incident reporting system is still needed to simplify the process for education workers, to facilitate information required by joint health and safety committees, and to support adequate data collection for analysis and action by the provincial government.

Given that there are still many barriers to workers reporting incidents in schools, ETFO’s data is currently the most reliable indicator of the levels of violence because of the high number of respondents to both the 2017 and 2023 surveys.

Recommendation:

18. Allocate funding to the Ministry of Education and Ministry of Labour, Immigration, Training and Skills Development to support the work of the Provincial Working Group on Health and Safety.

Funding to train school administration on appropriately responding to violent incidents

According to the Ministry of Labour, Immigration, Training and Skills Development, workplace violence continues to be the number one hazard and risk to workers in the education sector. The Ministry’s Workplace Violence in Education initiative included focused inspections of schools in February and March 2023. Despite the school boards being visited in 2018 to remind them of expectations, support being provided to school boards by their health and safety associations, and school boards receiving advanced warning of the inspections, a significant number of schools were found to be non-compliant with the *Occupational Health and Safety Act* (OHSA) - particularly OHSA Section 32.0.3 requiring employers/supervisors to assess and re-assess the risk of workplace violence.

Although 58 per cent of members who experienced violence informed their administrators, only 41 per cent indicated that they always made a written/online report, meaning that administrators are aware of the significant under-reporting of violence. At the same time, 63 per cent of ETFO members said that school administrators do not take the problem of violence in elementary classrooms as seriously as they should.

Only 36 per cent of ETFO members who reported incidents of violence indicated that there was follow-up or investigation “in all cases” or “in some cases.” This is a significant decrease from the 50 per cent reported in ETFO’s 2017 survey. When there were follow-up actions to prevent the recurrence of violent incidents, only eight per cent of members rated those actions as effective.

School administrators need support in understanding their legal responsibilities related to incident reporting, immediately responding to incidents, consulting and debriefing with staff, creating and updating

safety plans and risk assessments, and notifying staff of the risk of violence. Training for administrators should be developed in consultation with the PWGHS.

Recommendation:

19. Provide funding to school boards to ensure all administrators are provided with training to prepare them to address workplace violence.

Building More Inclusive Classrooms

The COVID-19 pandemic highlighted the deep-rooted socio-economic disparities that exist in our province; already marginalized communities disproportionately felt the negative impacts of the pandemic. Those communities were also the most impacted by high inflation during the post-pandemic recovery, as they struggle to make ends meet. The government must take concrete steps to ameliorate the inequity experienced by these communities and build a more just Ontario for everyone, especially Black, Indigenous, racialized, and low-income communities.

In 2009, Ontario adopted an equity and inclusive education strategy titled *Realizing the Promise of Diversity*.⁶ This policy provides an important framework for equity in our public education system. In 2017, the government adopted a three-year action plan titled *Ontario’s Education Equity Action Plan* to “strengthen and reinvigorate the existing equity and inclusive education strategy”.⁷ Unfortunately, under

⁶ Ministry of Education (2009). *Realizing the Promise of Diversity. Ontario’s Equity and Inclusive Education Strategy*. Ontario Ministry of Education. files.ontario.ca/edu-2223-sip-guidelines-en-2022-03-18.pdf

⁷ Ministry of Education (2017). *Ontario’s Education Equity Action Plan*. Ontario Ministry of Education. files.ontario.ca/edu-1_0/edu-Ontario-Education-Equity-Action-Plan-en-2021-08-04.pdf

the current government, there has been little to no progress made on the implementation of the 2017 action plan, leaving the vision for equity outlined in the 2009 strategy unrealized.

To promote engaged and active learning among all students, classrooms and school libraries need textbooks and other resources that reflect the rich cultural, racial, and gender identities of students and their families. Educators need culturally relevant classroom materials that reflect the diversity of their classrooms and school communities. Teachers and other education workers also need professional learning that improves their ability to address racism, antisemitism, Islamophobia, sexism, homophobia, transphobia, ableism, and classism. These forms of discrimination affect our schools and permeate our society. This professional learning should take place within the instructional day.

Recommendations:

20. Provide culturally relevant classroom resources to support Ontario’s equity and inclusive education strategy.
21. Provide professional learning for educators to help them address racism, antisemitism, Islamophobia, sexism, homophobia, transphobia, ableism, and classism.
22. Resume the implementation of *Ontario’s Education Equity Action Plan*, originally released in 2017.

Combating Anti-Black Racism

Over recent years, there has been a widespread and unprecedented public recognition that systemic racism, particularly anti-Black racism, persists in our societies. ETFO recognizes the multiple and systemic ways that anti-Black racism is enacted and reproduced in all our institutions, including policing, health care, immigration, social services, and public education.

Anti-Black racism in education is long-standing and has harmed Black students, their families, and Black educators. In the past few years alone, several school boards have come under intense public scrutiny following the exposure of anti-Black racism in their practices. School boards, and the provincial government,

need to be accountable for upholding existing policies aimed at eradicating anti-Black racism, reporting on progress, and making the changes necessary to address anti-Black racism in schools.

The Ontario Human Rights Commission (OHRC) is currently in the action plan phase of its *Tackling Anti-Black Racism in Education* initiative. ETFO made a submission to the OHRC which will inform the action plan.⁸ Some of those recommendations are also included in this submission.

The Ministry of Education released the Board Improvement and Equity Plan (BIEP) in the fall of 2021. This planning tool is meant to support school boards in advancing equity and required school boards to collect voluntary student demographic data by September 2022. In January 2023, People for Education released a report titled *A progress report on anti-racism policy across Canada*,⁹ with a focus on publicly funded education. The report found that 74 per cent of public schools in Ontario included the term “racism” in their equity policy documents, 40 per cent of schools have an anti-racism statement on their website, and 28 per cent have an anti-racism policy on their website. While these are important steps in advancing equity and anti-racism, the question remains how schools are implementing anti-racism and equity strategies in their schools.

The concept of critical mass is important if the potential of racialized and Black teachers and education workers is to be realized within the education system. They need to see themselves represented in the system as part of a welcoming and inclusive culture. This is also true for Black students.

⁸ ETFO (2023). *Ending Anti-Black Racism in the Public Education System and Beyond - Submission to the Ontario Human Rights Commission*. etfo.ca/getmedia/ae39e628-fa90-4eac-9c89-9acadc334024/231025-Sept-2023-OHRC-submission.pdf

⁹ People for Education (2023). *A Progress Report on Anti-Racism Policy Across Canada*. peopleforeducation.ca/wp-content/uploads/2023/01/PFE-AntiRacismReport-EN-2023-v1d.pdf

There must be a concerted effort among all education stakeholders to address barriers in the recruitment, hiring, and retention of Black educators. Anti-Black racism training for all education leadership, staff, teachers, and education workers is key to achieving institutional and systemic change and to creating organizational cultures that are welcoming and inclusive of Black educators and students. The Ministry of Education must adequately fund and resource initiatives that address anti-Black racism within the public education system.

The government has acknowledged that anti-Black racism exists within the education sector and has stated that the well-being and mental health of Black communities is paramount. Without the necessary support for students and educators, students who have faced systemic barriers in the past will continue to do so. The government must fulfill its commitment and direct funding to the education sector and community organizations to eradicate anti-Black racism, and all other forms of racism, from Ontario’s public education system.

Recommendations:

23. Provide additional funding to school boards to hire more counsellors, social workers, and school nurses that would specifically assist families and students from Black, racialized, and Indigenous communities, as well as students living in low-income communities.
24. Provide funding to the public education sector and community groups for the purpose of eradicating anti-Black racism and other forms of racism.
25. Ensure that the collection of race-based data by school boards is standardized, includes all employees and their positions, respects employees’ privacy, meets current best practices, and is made publicly available.
26. Implement mandatory ongoing training and professional development for all administrators, school board trustees, and teacher candidates on recognizing and addressing anti-Black racism, including microaggressions.

Supporting Truth and Reconciliation in Public Education

The Truth and Reconciliation Commissions’ Call to Action #62 calls on the federal, provincial, and territorial governments to:

“i. Make age-appropriate curriculum on residential schools, Treaties, and Aboriginal peoples’ historical and contemporary contributions to Canada a mandatory education requirement for Kindergarten to Grade Twelve students.”

Through Indigenous-led and designed courses, students in Ontario will increase their knowledge of the historical and cultural contributions of Indigenous Peoples in Canada, including their harsh realities past and present. Students also stand to gain a deeper understanding of what truth and reconciliation means, and what Canada’s and Ontario’s obligations are to Indigenous Peoples moving forward.

To support the implementation of the updated Indigenous education curriculum, educators need culturally relevant curriculum resources that have been co-created with Indigenous people. The government should provide adequate funding for the creation of these resources.

Recommendation:

27. Allocate funding for the development of culturally relevant curriculum resources co-created with Indigenous people, to support the updated Indigenous education curriculum.

Supporting Second Language Programs

An area that requires greater transparency and accountability from boards, and where additional funding is necessary, is supporting children who enter Ontario schools without language proficiency in either English or French. These students require appropriate support to ensure they progress well academically, socially, and emotionally.

The number of students who speak neither English nor French when they register for school has increased significantly. As reported by the 2017 People for Education annual survey of public schools, 63 per cent of English elementary schools have English language learners (ELLs),¹⁰ compared to 43 per cent in 2002-03. These students face significant barriers and schools do not have adequate resources to support them. The pandemic created additional challenges for these students, especially for those engaged in virtual learning.

The funding formula for ELLs who are not born in Canada is a guaranteed per-student amount – which is reduced over four years – rather than a lump sum divided among school boards, as is the case for Canadian-born ELLs. Furthermore, the grants assume that ELLs only require special language programs for up to four years, an assumption that is not supported by reports from teachers who work with these students or by research on language acquisition. Funding should be allocated based on students achieving a standard level of language proficiency and not based on whether they were born in Canada or the number of years they have been in Canada.

There is currently no direct accountability for school boards to ensure that second-language grants are used for their intended programs. All too often, shortfalls in the funding formula have led to school boards using their second language grants for other purposes and short-changing ELL students. The Ministry of Education should establish accountability measures by mandating that school boards spend English as a Second Language (ESL) grants on the intended programs.

¹⁰ People for Education (2017). *Competing Priorities* (Annual Report on Ontario's Publicly Funded Schools 2017). peopleforeducation.ca/wp-content/uploads/2017/08/P4E-annual-report-2017.pdf

Recommendations:

28. Implement accountability measures to prevent school boards from diverting ESL funding to non-ESL services and require that school boards spend ESL funding on ESL program delivery.
29. Increase funding for English language learners (ELLs) programs and ESL teachers to meet the language acquisition needs of students requiring ELL support.

RECOMMENDATIONS

1. Establish an independent, external review of Ontario’s education funding formula to ensure it addresses actual student needs.
2. Increase public education funding to 2018-19 levels, accounting for inflation.
3. Reinstate the requirement for Data forms B, C and D in the EFIS estimates reporting cycle.
4. Base special education grants on actual student needs.
5. Allocate funding to school boards for the hiring of additional educational assistants, psychologists, behavioural therapists, child and youth workers, school support counsellors, and speech and language pathologists.
6. Allocate funding to provide occasional teachers and occasional education workers paid professional learning on teaching and educational strategies to support students with special education needs.
7. Increase funding to school boards to hire additional ERS specialist teachers to address increasing student need.
8. Provide funding for a provincial standardized online incident reporting system for all school boards to use for reporting injuries and illness, safe school incidents, exclusions, and workplace violence.
9. Cancel EQAO assessments and reallocate EQAO funding to improving student learning conditions.
10. Provide additional funding to improve access to culturally relevant in-school supports, including guidance counsellors and social workers, especially in underserved areas.
11. Allocate funding for additional in-school and community supports necessary to ensure students’ developmental and behavioural needs are met.
12. Develop and deliver – in consultation with mental health experts, teachers, education workers, unions, and other education stakeholders – long-term, fully funded, comprehensive, culturally responsive mental health supports for students.
13. Allocate ongoing, sustainable funding for high-quality professional learning for educators in student mental health, to take place within the instructional day.
14. Cap grades 4 to 8 class size at 24 students.
15. Cap Kindergarten class size at 26 students.
16. Ensure every Kindergarten class is staffed with a full-time certified teacher and a designated early childhood educator.
17. Provide adequate funding to school boards to ensure availability of appropriately trained staff to fill absences regularly, due to illness, for following up on violent incidents.
18. Allocate funding to the Ministry of Education and Ministry of Labour, Immigration, Training and Skills Development to support the work of the Provincial Working Group on Health and Safety.
19. Provide funding to school boards to ensure all administrators are provided with training to prepare them to address workplace violence.

20. Provide culturally relevant classroom resources to support Ontario’s equity and inclusive education strategy.
21. Provide professional learning for educators to help them address racism, antisemitism, Islamophobia, sexism, homophobia, transphobia, ableism, and classism.
22. Resume the implementation of *Ontario’s Education Equity Action Plan*, originally released in 2017.
23. Provide additional funding to school boards to hire more counsellors, social workers, and school nurses that would specifically assist families and students from Black, racialized, and Indigenous communities, as well as students living in low-income communities.
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25. Ensure that the collection of race-based data by school boards is standardized, includes all employees and their positions, respects employees’ privacy, meets current best practices, and is made publicly available.
26. Implement mandatory ongoing training and professional development for all administrators, school board trustees, and teacher candidates on recognizing and addressing anti-Black racism, including microaggressions.
27. Allocate funding for the development of culturally relevant curriculum resources co-created with Indigenous people, to support the updated Indigenous education curriculum.
28. Implement accountability measures to prevent school boards from diverting ESL funding to non-ESL services and require that school boards spend ESL funding on ESL program delivery.
29. Increase funding for English language learners (ELLs) programs and ESL teachers to meet the language acquisition needs of students requiring ELL support.

SELECTED SOURCES

R. Tranjan (2024). Ontario’s Core Education Funding has dropped by \$1,500 per student since 2018. *The Monitor*. Canadian Centre for Policy Alternatives. monitormag.ca/articles/ontarios-core-education-funding-has-dropped-by-1-500-per-student-since-2018/

People for Education (2024). *Access to Special Education in Ontario Schools: The Gaps and Challenges*. peopleforeducation.ca/wp-content/uploads/2024/05/Access-to-Special-Education-In-Schools_3June.pdf

Schanzenback, D.W. (2014). *Does Class Size Matter?* National Education Policy Centre.

Gilraine, Michael, Macartney, H. and McMillan, R. (2018). *Education Reform in General Equilibrium: Evidence from California’s Class Reduction*. National Bureau of Economic Research.

StratCom (2023). *2023 Workplace Violence Survey*. *The Elementary Teachers’ Federation of Ontario*. etfo.ca/getmedia/78cffcdd-8e6f-4703-a8d1-9ef03ad97a5f/230602-ETFO_2023-Workplace-Violence-Survey-report-CONDENSED-rev2-appendix-B.pdf

ETFO (2023). *Ending Anti-Black Racism in the Public Education System and Beyond - Submission to the Ontario Human Rights Commission*. etfo.ca/getmedia/ae39e628-fa90-4eac-9c89-9acadc334024/231025-Sept-2023-OHRC-submission.pdf

People for Education (2023). *A Progress Report on Anti-Racism Policy Across Canada*. peopleforeducation.ca/wp-content/uploads/2023/01/PFE-AntiRacismReport-EN-2023-v1d.pdf

Ministry of Education (2009). *Realizing the Promise of Diversity*. *Ontario’s Equity and Inclusive Education Strategy*. Ontario Ministry of Education. files.ontario.ca/edu-2223-sip-guidelines-en-2022-03-18.pdf

People for Education (2017). *Competing Priorities (Annual Report on Ontario’s Publicly Funded Schools 2017)*. peopleforeducation.ca/wp-content/uploads/2017/08/P4E-annual-report-2017.pdf



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