



Elementary Teachers' Federation of Ontario (ETFO)

Fédération des enseignantes et des enseignants
de l'élémentaire de l'Ontario (FEEO)

136 Isabella Street, Toronto, ON M4Y 0B5
Tel: 416-962-3836 Toll Free: 1-888-838-3836 etfo.ca

December 8, 2021

VIA EMAIL: dhaime@oct.ca

Dr. Derek Haime
Registrar and Chief Executive Officer
Ontario College of Teachers
101 Bloor Street West
Toronto, ON M5S 0A1

VIA EMAIL: stephen.lecce@pc.ola.org

The Honorable Stephen Lecce
Minister of Education
5th Floor, 438 University Ave.
Toronto, ON M5G 2K8

Re: Ontario College of Teachers' Sexual Abuse Prevention Program

As an organization that centres student safety as a key priority in Ontario schools and that offers similar courses and professional learning to members, we recognize the importance of what the Sexual Abuse Prevention Program (SAPP), as proposed by the Ontario College of Teachers (OCT), seeks to achieve. There is no question that sexual abuse prevention training is valuable, necessary, and should be part of the two-year pre-service programs delivered through faculties of education for every teacher-candidate.

We wholeheartedly support the purpose of the training—to protect students—but introducing the SAPP, as proposed, during a global pandemic presents challenges, as teachers are still navigating public health complexities, changes to the work environment, and pandemic-related mental health impacts. Considering these and other difficulties, we ask that you revise the SAPP implementation plan to ensure this mandatory program may be accessed in a way that ensures its successful completion by all teachers.

The provincial government has attempted to make sexual abuse prevention a priority through an amendment to the *Ontario College of Teachers Act*. Unfortunately, like many of this government's initiatives, it was introduced hastily, without proper resources and supports, and our recommendations on the matter were not considered.

We are aware of a response the OCT provided to the Ontario Teachers' Federation on December 2, 2021. However, we feel it is important that we also share our concerns to the OCT and the Ministry of Education as we work to ensure ETFO members are supported in their completion of the SAPP so that every student in Ontario is protected.

Some of the challenges that the OCT must now consider, include:

- the supports that may be needed by teachers who are themselves victims of sexual abuse and for whom the training may be traumatizing or re-traumatizing;
- the implications for members who may be on leave and unavailable before the start of next school year, or who require medical accommodation to complete this new requirement; and
- the expectation that members complete the mandatory training outside of work hours.

On these matters, to support teachers and ensure completion of the SAPP, we ask that:

- the OCT work with the Ministry of Education to extend the deadline for completion of the SAPP to December 31, 2022, either by amending the existing regulation or by using the discretionary power granted to the Registrar;
- school boards be directed to provide time during the instructional day to complete the training (as per the established practice for mandatory health and safety training); and
- a professional activity (PA) day in the fall of 2022 be allocated for the completion of training for all teachers employed by school boards, including occasional teachers and those on leave.

This approach to professional learning will allow members to discuss and reflect together on the content of the program. Having the support of colleagues throughout the program is critical, especially for those who may be negatively affected, traumatized, or re-traumatized by the program.

Additionally, as we work together to best support teachers, students, families and our wider communities, we ask that you address the following with regards to the SAPP implementation plan:

- What specific accommodations and supports will be provided to members who are vulnerable and may themselves be victims of sexual abuse? Will accommodations go beyond the OCT's current suggestion that these members complete the SAPP "in a group or with a trusted person," and/or over multiple sessions, and/or bypassing non-mandatory content?
- Is the OCT considering exemptions? Are protocols being developed to support members who may require specific accommodations to complete the SAPP?
- The OCT has indicated that the notation, "Sexual Abuse Prevention Program To Be Completed" will appear on the public register on January 3, 2022, immediately upon the program being made available to members; in other words, before members even have the chance to complete the program. This will lead to the misperception by some that members have missed a completion deadline, or that there is a concern about a member's behaviour that requires them to complete sexual abuse prevention training. This may cause undue stress to members and families. As such, we request the OCT wait until the deadline has passed before adding any notation to the public register and Certificate of Qualification and Registration.

- Our understanding is that a current member's Certificate of Qualification and Registration is not impacted, other than the notation, if they do not complete the training, and that school boards, as employers, would determine if a member can be hired or continue to work if they have not completed the SAPP. This ambiguity could lead to inconsistencies across the province and contribute to Ontario's growing teacher shortage.
- We are concerned about the lack of transparency in how the SAPP's development and implementation will be funded, and if this program is being financed entirely by member fees paid to the OCT.

The OCT's implementation of the SAPP must happen in conjunction with the Ministry of Education, so that a decision by the Ministry to mandate the SAPP's completion during a PA day in the fall of 2022 is made concurrently with the OCT extending the deadline to December 31, 2022.

To be clear, ETFO members care deeply about the safety and well-being of the students we have the privilege to serve, and, as always, we will do what is necessary to safeguard their physical and mental health, and well-being.

We urge you to revisit the SAPP implementation plan so that this mandatory program may be accessed in a way that ensures successful completion for all teachers.

Looking forward to your prompt response on this matter.

Sincerely,

A handwritten signature in black ink, appearing to read 'Karen Brown', enclosed within a large, stylized oval shape.

Karen Brown
President

KB:SO:CP:MG

Copy: Paul Boniferno, Transition Supervisory Officer, OCT
Nancy Naylor, Deputy Minister of Education