



**ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION**

**Leading Education's Advocates**

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**To: Awareness Training Programs Regulation Project  
400 University Ave. 12<sup>th</sup> Floor  
Toronto, Ontario M7A 1T7**

**Re: OPSBA Submission Regarding the Proposed Regulation for Mandatory Health and Safety  
Training for All Workers and Supervisors.**

The Ontario Public School Boards' Association (OPSBA) represents public district school boards across Ontario. Together our members serve the educational needs of almost 70% of Ontario's elementary and secondary school students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for all students regardless of their ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality, or religious affiliation.

We have been following the issues concerning occupational health and safety over the past several years and most recently commented on Bill 160 *Occupational Health and Safety Statute Law Amendment Act, 2011* and the preliminary implementation of the recommendations given by the Expert Panel on Occupational Health and Safety led by Tony Dean. As we stated then, "our Association fully supports ensuring that schools are safe places for students to learn and staff to work. School boards are committed to providing a safe learning and working environment for everyone. It's important to note that school boards have policies and procedures in place already that address occupational health and safety concerns. Most school boards have Health & Safety Professionals and they connect regularly with their counterparts across the province. In addition, Boards provide training to their employees."

Moreover we had also said that the current Act, "does not, however, address responsibility for the cost for workers (and employers) to participate in these new standardized training programs. It is our position that fully funded, regular and on-going training that, in its delivery, does not impact services provided to students is critical to ensure that all of our workers, be they teachers, support staff, principals, or others, remain aware of health and safety issues. School boards spend significant amounts of money on training for staff to improve student educational outcomes. The costs of additional health and safety training for the many thousands of school board employees would be significant, and if required, must be borne by the provincial government through the allocation of a specific grant targeted to training, including the costs of training facilities and trainers."

With regards to the content of this proposed regulation, we offer the following comments:

**Application and Coming into Force**

- We are supportive of a transition period that will provide time for both existing workers and supervisors to complete training. Different sectors have different business cycles that demand more at different times. This flexibility will allow school boards to plan and schedule their training.

#### Timing

- The current wording to have worker training done “as soon as practicable after commencing work duties” is again a good sign of flexibility. We agree that supervisors need to complete their training more quickly but “within the first week” is far too short of a timeframe and therefore we recommend that this be extended to “within the first month”.

#### Transferability and Records

- We agree that workers should not have to retake training if they transfer jobs so long as they have completed a program that met the requirements when they change employers. This makes sense. We believe clarification is needed on how the worker would be required to communicate and share this training completion and what standard is expected, e.g., a certificate?
- With regards to maintaining records, a standard example provided by the ministry would be greatly appreciated. This would ensure common practices among the sector and ease any initial administrative work (and costs) that may be imposed.

#### Compliance

- The proposed regulation states that the Ministry will have resources available to assist employers in determining if their current programs meet the new standards. What are these resources and when would they be shared with employers? How would employers submit their information? The regulation does not indicate how often compliance information needs to be collected.

#### Minimum Content Requirements

- These lists seem reasonable. We know that our member boards already provide comprehensive training that would exceed this list.
- The Supervisor awareness list includes resources and assistance. Should this not also be included in the worker awareness list? Both lists should also include contact information and emergency numbers.
- We strongly recommend that the ministry include mechanisms to ensure that there is consistency in training practices.

#### Outstanding Questions and Concerns:

- Training programs must be offered and available in multiple languages.
- Training programs should also follow AODA standards and requirements.
- How long is an awareness training program expected to be?
- What is the methodology for the training – written, online and/or in a classroom set up? We support and request local flexibility in determining the appropriate mechanism to deliver training.
- How will the Ministry ensure that training is consistent?
- Will the Ministry be providing the appropriate funding to employers?

We ask that the Ministry of Labour consider our comments as described above and thank you for the opportunity to contribute. We look forward to future communications about the content for the final regulation.

Finally, we would like to acknowledge the involvement of school boards and the support provided by Chris Broadbent, TDSB Health and Safety Manager and OPSBA's Health and Safety Expert, in the piloting of the supervisor training materials. This is another successful example of engaging in collaboration in ways that ensure that the education sector is represented.

Sincerely,



Michael Barrett, President  
Ontario Public School Boards' Association