

Submission to the Ministry of Education

Accelerated Apprenticeship Pathway Program

November 2023

ONTARIO ENGLISH
**Catholic
Teachers**
ASSOCIATION

The Ontario English Catholic Teachers' Association (OECTA) represents the 45,000 passionate and qualified teachers in Ontario's publicly funded English Catholic schools, from Kindergarten to Grade 12.

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November 2023

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1. INTRODUCTION

- 1.01** The Ontario English Catholic Teachers' Association (OECTA) welcomes the opportunity to offer input, on behalf of 45,000 teachers working in Ontario's publicly funded Catholic schools, as the Ministry of Education seeks feedback from stakeholders on two potential models for an accelerated apprenticeship pathway.
- 1.02** At a press conference on March 8, 2023, Premier Doug Ford – joined by Education Minister Stephen Lecce; then-Labour, Immigration and Skills Development Minister Monte McNaughton; and Finance Minister Peter Bethlenfalvy – announced the government's intention to make significant changes to publicly funded education, by providing students in Grade 11 the option to transition to a full-time, skilled trades apprenticeship program.
- 1.03** As is customary, a news release was distributed shortly after the press conference. The release included quotes from 13 individuals – almost exclusively representatives of various industries – who extolled the virtues of the government's plans. Conspicuously absent from a news release about changes to the education system, was any quote of support from an education stakeholder.
- 1.04** Indeed, the Association was neither consulted nor advised ahead of the announcement. As will become evident throughout this submission, a number of issues and potential problems that plague the government's proposed approach might have been pre-empted had the government sought the expertise of teachers, education workers, and their representatives ahead of time.

- 1.05** In addition, by proposing two models for an accelerated apprenticeship pathway, and then seeking input on those models, the government has set arbitrary boundaries around the topic, which serve to limit discussion. This, to borrow a construction term, is a bad foundation to build upon – and ultimately raises more questions than it answers.
- 1.06** Nevertheless, the Association will bring to bear its considerable expertise in education, pedagogy, and student development, in an effort to raise critical points that the government must consider if it is to continue moving forward with its plan to broaden pathways to the skilled trades.
- 1.07** The accompanying *Consultation Paper* (2023) provides a series of guiding questions with regard to the two proposed models. This submission will offer comment on those questions, where necessary, while raising additional issues and questions throughout.
- 1.08** This submission is organized into the following sections:
- Introduction
 - Skilled trades and the purpose of education
 - Description of the proposed models
 - Fundamental issues with the Employer Supervised Apprenticeship model
 - Comments on the Equivalent Apprenticeship Learning model
 - Additional and unanswered questions

2. SKILLED TRADES AND THE PURPOSE OF EDUCATION

- 2.01** As the government considers potential models for accelerated apprenticeship pathways, we must remember that any program or pathway that allows students to leave high school to pursue an apprenticeship, and decreases the likelihood of obtaining a high school diploma, could have the unintended consequence of narrowing those students' long-term financial and career opportunities.

There have been many recent news reports on the growing labour shortage in skilled trades, both in Ontario and across Canada, as the proportion of skilled trades workers aged 55 or older has reached an all-time high (CIBC Capital Markets 2023). This issue is particularly acute in the construction industry, where an estimated 300,000 workers will retire within the next decade (Butler 2023).

- 2.02** To a certain extent, this trend was anticipated well in advance. Economists such as Armine Yalnizyan have long forecasted that an aging "Baby Boomer" population would come to put pressure on the labour market – and notes that the best structural antidote to this is to significantly increase wages and improve working conditions (Crawley 2023). The Ford Conservative government has, thus far, resisted such policy options.

- 2.03** It is also true that publicly funded education has a role to play in promoting the skilled trades as a rewarding career option. It is a longstanding and unfortunate reality that perceptions of the skilled trades remain disproportionately negative among youth, who often view this path as a "last-resort option for post-secondary education" (Menard 2022; Ministry of Labour 2021). Undoubtedly, there is work to do in order to create improved access and supportive pathways for youth to enter

the skilled trades – including updates to existing programs, such as the Ontario Youth Apprenticeship Program (OYAP).

- 2.04** At the same time, it is easy to fall into a reductionist trap and to view education solely as a means through which to obtain a career. This view is shortsighted and narrow. We must always remember that the overarching goal of publicly funded education should be to prepare students with a broad range of values and competencies that will enable them to successfully adapt throughout their lives.
- 2.05** Laying a foundation of job-related abilities should be one function of the publicly funded education system. However, young people are entering a rapidly evolving labour market, and they will need to continually upgrade their knowledge and technical skills throughout their lives to meet the requirements of jobs that do not yet exist (World Economic Forum 2023; Segovia and Checa 2021). Thus, we must remain focused on the needs of students and the public, broadly – rather than the narrow and current desires of business interests.
- 2.06** It certainly should not be the expectation that every graduate will go on to university. Many of the jobs that will be most in demand over the next few decades will require a high level of skills, but not necessarily a university degree. Public awareness campaigns and labour market information should be used to promote the skilled trades as viable and potentially lucrative career options. More resources should be provided for guidance counselling, to help students and families make informed choices about post-secondary goals and planning (Ministry of Labour 2021; Sorensen 2013).

- 2.07** However, it has long been the case that a high school diploma serves as a prerequisite for the strong majority of well-paying jobs, and those who complete high school continue to enjoy a significant advantage in median annual earnings compared to those who do not possess a high school diploma (Statistics Canada 2017).
- 2.08** As we consider the promotion of skilled trades within publicly funded education, we must ensure that “job-readiness” does not become the main objective. Students who are taken out of the classroom for any length of time after Grade 10 will lose out on the competencies, knowledge, and broader social experiences that occur within schools during Grades 11 and 12 – and are vital to a student’s holistic development.
- 2.09** Parents, teachers, education workers, and the general public want students to be prepared to move the economy forward, but publicly funded education should be about much more. We must continue to seek a balance between instilling hard skills, encouraging collaboration, critical thinking, and problem solving, and fostering the development of thoughtful, creative, caring, well-rounded, and engaged citizens.

3. DESCRIPTION OF THE PROPOSED MODELS

- 3.01** The government has proposed two models for consideration, which will form the basis of feedback from stakeholders. Both models involve full-time apprenticeships for students who are at least 16 years old and have completed at least 16 high school credits (Ministry of Education 2023).

3.02 Before discussing each model in more detail, it is helpful to outline the key distinguishing features of each.

3.03 *Model 1: Equivalent Apprenticeship Learning*

- Students would remain a pupil of their school board and be partially funded on the secondary school register.
- There would be no expectation for students to be in school during instructional days.
- Students would have continued access to school board services and supports (e.g., guidance services, Student Success teacher/team).
- Students would be excused from attending school on a daily basis, while they continue to participate in equivalent apprenticeship learning under the supervision of the board while in a registered training agreement with an apprenticeship sponsor.
- Check-ins with school staff (e.g., teacher, Student Success teacher, Student Success Lead, OYAP recruiter, provincial attendance counsellor or other primary contact) would take place on a regular basis.
- A Supervised Equivalent Apprenticeship Learning (SEAL) Committee could be created at the school board level – students could be assigned a contact with whom they would have regular connection and from whom they would receive an annual SEAL Plan outlining goals.
- New courses or assignments could be developed that might involve “traditional classroom learning either remotely, in night school or summer school.”
- All credits toward students’ Ontario Secondary School Diploma (OSSD) would be earned through hands-on apprenticeship experience.

- Students could participate in school-based activities and groups (e.g., school sports, student council, student-led groups), so long as these activities were not in conflict with the student's apprenticeship schedule.

3.04 *Model 2: Employer Supervised Apprenticeship*

- Student-apprentices would not be considered pupils of a school board and would be excused from attendance at school while pursuing apprenticeship learning full time.
- No secondary school credits would be earned by the student for their apprenticeship experience while they work towards their Certificate of Apprenticeship.
- As participants would no longer be considered students, they would not have access to school board services and supports.
- Upon completion of a Certificate of Apprenticeship, the young person, when eligible, could choose to go through a *Prior Learning Assessment and Recognition for Mature Students* process at a school board to earn/receive their OSSD.

4. FUNDAMENTAL ISSUES WITH THE EMPLOYER SUPERVISED APPRENTICESHIP MODEL

- 4.01** Although this is the second model outlined in the *Consultation Paper*, it is worth discussing first in this submission. The significant structural issues with this model make it unfit for adoption. Simply put, this model is designed to meet the crude need of employers to have bodies, while completely disregarding any aspect of student development or health and safety.

- 4.02** There are three categories of structural weakness with this proposed model.
- 4.03** *Cutting off students from supports and resources*
- 4.04** This model proposes to remove 16-year-olds from their school boards, and thus denies them access to any services and supports associated with their school board. This would have a significant and negative impact on students, in both the short and long terms.
- 4.05** An overwhelming amount of research highlights the current crisis of student mental health, and the desperate need for students to have access to resources and supports (OECTA 2023). School Mental Health Ontario reports that, as of 2023, one-in three Ontario parents have had a child miss school as a result of anxiety. In 2019, according to data from Statistics Canada, 73 per cent of children aged 12 to 17 described their mental health as “very good” or “excellent.” A follow-up study in 2022 found that this number had decreased by 12 per cent (Statistics Canada 2020).
- 4.06** Although chronic underfunding from the provincial government has reduced the availability of much-needed supports, the publicly funded education system – under the care of teachers and education workers – remains the best environment for students to have their needs identified and addressed. Removing students from their school boards, cutting off access to supports, and ushering them into workplaces with unknown standards for safety and care will only make this crisis-level situation more acute and severe.

4.07 Even if one disregards issues of mental health and well-being, there are still serious questions as to whether 16-year-olds possess the maturity necessary to successfully navigate a full-time career in the skilled trades. The benefits of social and emotional learning (SEL) are well-researched, with evidence demonstrating that an education that promotes SEL yields long-term positive outcomes (CASEL 2023). This is something Catholic teachers deliver each and every day. However, this model would propose to strip students of their teacher-led SEL development and place that onus on employers, who are neither prepared nor equipped to provide the social-emotional support they need during this formative period.

Closely related to this is the issue of workplace culture, and students' ability to manage the psycho-social elements of the adult work environment. Some social situations could present students with a sense of pressure in order to be "accepted" by their work colleagues. Teachers are critical in providing students with the skills and strategies to manage these types of situations. However, under the proposed model, students would be removed from school setting and thus lose all access to the supports that teachers provide in navigating these potentially sensitive scenarios.

4.08 At a more basic level, this model leaves students without practical resources they rely upon to navigate the early years of employment. If this model were adopted, a 16-year-old would be left largely to themselves to navigate their education and career. For instance, if an employer asked a 16-year-old student to partake in a work task that could pose a health and safety risk, would the student know how to respond? Would they know how to access important resources concerning their health and safety? Would that student even be aware of their rights under the *Occupational Health and Safety Act*? These are not hypothetical questions – every

day, adult workers face problematic situations and requests from their employers. Removing access to vital resources and supports for health and safety could leave students in exceedingly vulnerable, potentially hazardous situations.

4.09 Further, under this proposed model staff in the Ministry of Labour, Immigration, Training and Skills Development of Ontario would see a dramatic workload increase, as these individuals would now be responsible for helping 16-year-olds find a full-time job in order to sign the required Registered Training Agreement (RTA) to continue on this accelerated apprenticeship pathway.

4.10 *Logical inconsistencies with the proposed model*

4.11 There are logical inconsistencies with the Employer Supervised Apprenticeship model, which become apparent when one considers several possible outcomes.

4.12 For instance, this model creates a Catch-22: theoretically, a student can apply for an OSSD after successful completion of an apprenticeship program through the Prior Learning Assessment and Recognition (PLAR) for Mature Students process. However, at the same time, under the current requirements that student could *not* do this, as the PLAR process for Mature Students requires a student to complete Grades 11 and 12 English, Grade 11 Math, and another senior-level credit prior to being granted an OSSD.

4.13 A second hypothetical example highlights the potential for this model to impact a student's future. Consider a student who engages this model at 16 years old. They move through the apprenticeship pathway, but just prior to completing their five-year apprenticeship, they become disillusioned and leave the field. In this entirely

plausible example, the student would not have completed their Certificate of Apprenticeship, and thus would not be eligible to obtain an OSSD through PLAR. The result would be a 21-year-old individual, with no educational credentials, a Grade 10-level education, no career prospects, and no access to resources or supports. This devastating situation would be a consequence of the structural weakness of this proposed model.

4.14 *Opposition to the government's stated policy objectives*

At a more philosophical level, the Supervised Apprenticeship Model seems to be in diametric opposition to the policy direction this government claims to favour. The topic of streaming – and de-streaming – has received widespread media attention, most recently from reports that the government is severely underfunding the de-streaming process, and thus jeopardizing its success (Balintec 2023; Alphonso 2023; Callan 2023; Rushowy 2023).

4.15 It is worth noting that, when de-streaming was introduced, the government based its announcement on two reasons. The first reason was related to equity concerns. Research has long established that students who are Black, racialized, Indigenous, and/or from equity-deserving communities had disproportionately been streamed into applied rather than academic programs (OECTA 2021). In 2017, York University Professor Carl James published a comprehensive report on streaming and its implications for Black students, which drew on consultations with parents, students, educators, and administrators in the GTA, and used data from the Toronto District School Board. The research found that only 53 per cent of Black students were in academic programs, compared to 81 per cent of white students. The report indicates that Black students' expectations and attitudes are "gradually worn down" by the education system (James and Turner 2017).

- 4.16** For this and other reasons, the Association has long supported the call for de-streaming, provided that it be accompanied by the funding, resources, supports, and training necessary to make it effective – and also be part of a broader and comprehensive approach to improving equity in publicly funded education (OECTA 2021).
- 4.17** It is important to note that streaming still exists for Grade 10 students. As such, this model, which proposes that students exit the education system after Grade 10, would see students making decisions about apprenticeship pathways after being streamed. This raises important questions about whether students in applied courses will be more likely to make the choice to engage the Supervised Apprenticeship Model than those in the academic stream. If this occurs, then this program will serve to facilitate and exacerbate the very equity problem the government claims it wants to address.
- 4.18** A second aspect of streaming concerns the timing of when young people are required to make important decisions. One of the negative perceptions of streaming is that it forces students at young ages to make potentially life-altering decisions about their futures. This was another of the government’s stated purposes for ending streaming, though it was less emphasized than the equity considerations.
- 4.19** If the government adopted the Supervised Apprenticeship Model, it would essentially be reintroducing the same problem – students would be forced to make significant decisions about their lives and future careers at 15 years old.
- 4.20** Given the overwhelming evidence against this model – cutting off students from resources and supports; logical inconsistencies; and that it is in opposition to stated

government policy objectives – the Supervised Apprenticeship Model must be rejected from consideration.

5. COMMENTS ON THE EQUIVALENT APPRENTICESHIP LEARNING MODEL

5.01 The proposed Equivalent Apprenticeship Learning Model has fewer of the glaring structural weaknesses found in the Supervised Apprenticeship Model. While there are aspects of the Equivalent Apprenticeship Learning Model that are worth considering further, there remain some important concerns, gaps, and questions surrounding aspects of its implementation.

5.02 This section is structured around the relevant questions outlined in the *Consultation Paper*:

1. From the perspective of your organization, what are the strengths and weaknesses of model 1?
3. What would be needed during Grades 9 and 10 to support students to:
 - a. Make the decision regarding whether they wish to enrol in the accelerated apprenticeship pathway starting in Grade 11?
 - b. Be effectively prepared to possibly begin an apprenticeship in Grade 11?
4. For this model:
 - a. Should a student be connected to a specific school, or should they be connected at the board level only?
 - b. What supports would school boards be able to provide to students during their apprenticeship?
 - c. What specific services would students need to have access to?

- d. Are there funding implications that should be considered to support students who are participating in the accelerated apprenticeship pathway?
 - e. Do you have any other considerations or concerns about model 1? Are there specific additions or changes required?
- 6. For this model:
 - a. What supports would need to be in place to ensure that students' needs related to mental health and well-being are addressed?
 - b. What would need to be in place to meet the needs of any students with special education needs and/or disabilities who may require accommodations?

5.03 *Question 1: Strengths and weaknesses of the Equivalent Apprenticeship Learning Model*

5.04 **Strengths**

5.05 *Connection and access*

- The fact that the student remains a pupil of their school board is a strength, compared to the alternative proposed model. However, it is also important that the student remain a pupil of the individual "school" in which they were enrolled for Grades 9 and 10. This would ensure consistency of contact with caring and qualified adult staff, resources, and supports. It would also allow students to remain connected with their peer community and participate in school events.
- Remaining a pupil of their school board, and thus retaining access to resources and supports, is a clear relative strength of this model.

- If a student wanted to return to school, was unsuccessful in the apprenticeship, or was laid-off, the reintegration process back into school would be well supported, as students would remain attached to schools and their available support.
- That students work towards an OSSD, in addition to their Certificate of Apprenticeship, is a relative strength of this model. This model would enable students to graduate with the OSSD at the same time as their cohort. This will allow students to move into other post-secondary pathway options if they so choose.

5.06 *Monitoring*

- The proposed check-ins with a school or board staff are a strength relative to the alternative model. However, it is imperative that these check-ins be conducted and monitored by a qualified teacher who has experience with OYAP and/or co-operative education. Ideally, this should be a qualified co-op teacher from the student's "home school" and/or the OYAP Co-ordinator/ Consultant at the school board level. The government must ensure that this individual is a teacher who is experienced in all facets of co-op (i.e., health and safety, conducting initial safety pre-placement assessments, monitoring visits, etc.).
- The idea of a "SEAL" plan that includes learning goals, outcomes, checkpoints, and – imperatively – a transition plan, in the event that the intended pathway is no longer viable, is a strength.

5.07 *Transition*

- This should allow students to access OYAP and co-op, which provide supported early entry into the trades and assistance in finding a placement and registering as an apprentice.

- This allows for a collaboration between schools and employers. It could be more attractive to employers, as the most onerous part of the apprenticeship for the employer is when the worker is least experienced. Employers are willing to train, but typically only if the student has some technical ability and soft skills. Employers have come to use OYAP placements as a reliable way to recruit employees. This benefits the student as well, as they have more runway to prove that they are worth the investment to train them as apprentices. At the same time, it will be necessary to establish requirements and/or commitments from employers to ensure that student-participants are not regarded as solely as a “body” for employment.
- This proposed model can be delivered with minimal changes to existing school board support structure. The infrastructure necessary to provide the support for the program exists already at the school board level. Some staff would need to be redeployed centrally to support the additional monitoring duties.

5.08 *Health and safety*

- The safety and well-being of our students is always a top priority. A strength of this model is that it would allow for teachers to work alongside community employers and partners to ensure safe working environments. This model would also promote ongoing worksite placement assessments and monitoring by teachers and designated monitors. Students do not always feel comfortable voicing their concerns and issues, and this model would allow a trusted teacher to bridge these conversations. Workplace health and safety is especially important for young and new workers. Statistics show these workers are more likely to get injured or killed on the job, when compared to their more experienced coworkers. According to the Ontario Ministry of Labour, Immigration, Training and Skills Development, between 2011 and 2020, there

were more than 70,000 injuries reported among workers aged 15 to 24.

Injuries ranged from minor cuts and bruises to more serious fractures and amputations. During this same time period, 29 young workers lost their lives on the job.

- The types of injuries and incidents young workers experience can depend on the industry in which they work. For example, in the construction industry, falls from heights are a common cause of injury among young workers. In the service industry, including retail and food services, injuries often result from slips and falls, as well as from burns from hot surfaces and liquids. In the manufacturing industry, workers are more likely to suffer from injuries caused by machinery. It will be important to take these differences into account when establishing specific student plans. It will also be necessary to establish and enforce the rights and protections of student-participants – and those teachers who oversee them.

5.09 Weaknesses

5.10 *Expectations*

- In this model, the student is excused from attending school on a daily basis, and there would be no expectation for students to be in school during instructional days. This could have a negative impact on the student's holistic development, and diminish their connection to peer groups and the wider school community.
- As currently written, the student would not necessarily be a registered pupil of an individual school (where they attended Grades 9 and 10).

5.11 *Assumptions*

- Regarding participation in school activities, Model 1 assumes that employers can and are willing to be flexible with staffing in order for students/apprentices to access release time so they may participate in school activities.
- This model notes the need for monitoring attendance, managing employer-apprentice expectations, timetabling, PLAR process, etc. However, there are no details or framework presented, and so many questions remain about how these aspects will be accomplished.

5.12 *Ambiguities*

- “Check-ins” are with a school or board staff. There is a lack of a clear plan outlining “who” (which school board staff) would be responsible for providing support.
- This model does not address the core courses that would need to be a required component of students’ ability to participate in this accelerated apprenticeship pathway. Courses such as math, English, physics, among others, not only provide an important knowledge base for students, but also they are foundational for students being able to progress and achieve the required levels of certification.
- The *Consultation Paper* is silent on the standards, requirements, and safeguards that would be established for trainers to be able to take on students into their skilled trade. One would hope that employers have the best intentions; however, we know from experience that this is not always the case. In essence, this model proposes to make employers *in loco parentis*, without articulating the legal obligations of employers. Thus, a series of commitments and minimum prerequisites for employers (i.e., criminal background checks) must be established and clearly articulated.

- Employers do not have the necessary training or expertise in the broader aspects of youth development, leaving them incapable of providing a level of care that teachers offer, and that students need during this formative period of their lives.
- The instruction that a "SEAL" Plan be created at the school board level is ambiguous. There should be clarity as to whom is responsible for this plan, and should involve a teacher who is experienced in the co-op program/OYAP program, preferably from the student's "home school."
- This model lacks a clear plan regarding new or modified Graduation Requirements for students/apprentices who choose to pursue this accelerated pathway model.

5.13 *Potential gaps/issues*

- The model proposes that students who pursue this accelerated apprenticeship pathway be "partially funded." This is exceedingly problematic and a form of privatization – one which comes at the expense of the publicly funded education system. Any program or pathway must be developed in consultation with teachers and their representatives, and must be fully funded by the government, without exception. There can be no space allowed for private interests to exert any influence on the development or operation of a program that exists within the publicly funded education system.
- It is an open question as to how students would complete Grades 11 and 12 Math and English credits, which are often necessary for success in the Level 1 apprenticeship programs, and daily living post-apprenticeship.
- It would be difficult to discipline students who violate the school's code of conduct while accessing school resources. How might a school's

suspension/expulsion negatively impact the student's participation at the workplace?

- This model raises a question as to who will help 16-year-old students/apprentices find a full-time job to sign their RTA?
- There is no clear plan for apprenticeship employment support. Nor is there sufficient post-secondary education planning for students with respect to Levels 1, 2, and 3 training. This is especially problematic given that the backlog to attain next-level certification is roughly one year.
- There is no clear plan outlining how students can opt back-in if they change their mind and want to return to secondary school.
- A major weakness of this model is that it does not outline a more seamless transition to an accelerated apprenticeship pathway. This already exists in the current system, as OYAP oversees an accelerated program for student apprenticeship as one of the student streams (participant, registrant, and accelerated registrant).

5.14 Question 3: What would be needed during Grades 9 and 10 to support students?

Taking the individual subcomponents of this question together, students in the transition years would benefit from exposure to various skilled trades, which would allow students to discover a potential trade or trades they may wish to pursue subsequently. There is little point in starting an accelerated apprenticeship in Grade 11 if the student is not confident or positive of the career pathway they would like to pursue. In fact, this student would be much better off enrolling in the traditional co-op course and then signing on as an OYAP student in Grades 11 or 12.

5.15 Students would benefit from the continued support offered through student services/guidance – including students with an Individual Education Plan (IEP).

Students need to have access to school-based supports – social workers, psychologists, mental health workers. Frequent monitoring by the school co-op teacher/board SEAL support teacher (similar to the SAL program) is also necessary.

5.16 Question 4: Connection/supports and services/funding

5.17 Connection

Students should be connected to a specific school, preferably their “home” school where they attended Grades 9 and 10. This would allow students to retain existing friendships and peer groups, and attend school events, participate in clubs, and more. This is a significant part of a student’s high school experience and contributes to their success.

5.18 Supports and Services

In regard to supports and services, school boards can provide access to “Student Success” supports, “Guidance and Career Education” supports, “Mental health” supports, and “Social Worker” supports. In addition, the support of a dedicated teacher should be made available to ensure students are meeting the learning goals of the apprenticeship, as well as ensuring the employers/businesses are continuing to follow health and safety protocols and providing a safe, healthy, inclusive, diverse, welcoming environment for our young students.

5.19 At the school board level, there needs to be a method to track student progress, and potentially reach out to see if the student has completed their apprenticeship and provide support for re-engagement, if necessary. There should be a way to identify these students in the Ontario Student Information System (ONSIS). This would likely require a funding commitment from the government to ensure that

ONSIS has the capacity to achieve its tracking objectives. Any data collection must also take into account the ability to identify and address equity and bias in those who are adopting this accelerated pathway.

5.20 Students will also require practical supports, such as assistance with resume and cover letter writing, as well as developing job-readiness skills. And consideration will need to be given to providing students assistance in finding placements and work opportunities.

5.21 Funding

5.22 For some students, particularly those from lower socio-economic groups, transportation to and from work, and purchasing Personal Protective Equipment (PPE) may be a barrier to participation. In addition to providing funding to address these barriers, there are also staffing considerations to ensure that qualified individuals are available to support these students.

5.23 Question 6: What supports are needed for mental health, well-being, and specific education and/or disability accommodations?

5.24 Simply put, all students in this model would deserve access to any support that is regularly made available to students registered in that school or school board. This underscores the importance of students being linked to a particular school.

5.25 Teachers are best placed to co-ordinate the delivery of services, ensure that an IEP is being adhered to, and can help build a modified program, as needed – collaborating with an employer to ensure that the working environment is optimized

for the student who has special needs and/or disabilities, or requires accommodations. Teachers are also best equipped to ensure that all proper health and safety protocols are in place, including required training (i.e., working at heights training, forklift training, etc.).

- 5.26** Given the evidence presented in this section, it is clear that – to answer question 7 about the preferred model – the Equivalent Apprenticeship Learning Model is superior.

6. ADDITIONAL AND UNANSWERED QUESTIONS

- 6.01** In the course of preparing this submission and reviewing the materials, there are several questions that should be put to the Ministry as it considers the models outlined in the *Consultation Paper*.

- The models proposed are new pathways. Has the government considered working from within existing programs (i.e., OYAP, Specialist High School Majors, co-op), to leverage existing program infrastructure and further enhance results while keeping students more closely connected to the school environment?
- What are the anticipated funding requirements to engage in an accelerated apprenticeship pathway program? This calculation should include anticipated costs for staffing, additional resources and supports, infrastructure and technology requirements, administrative needs, and more. Is the government prepared to make a commitment to fully fund this program and to ensure that a funding shortfall does not create opportunities for private interests to influence the program, or open space for privatization in publicly funded education?

- How does the government plan to address structural issues within Ontario's apprenticeship landscape, which have contributed toward premature departure from apprenticeships in the skilled trades?
- The negative stigma around skilled trades persists. Simply opening accelerated pathways to students will not entice them to enroll in an apprenticeship. What is the government doing – and what resources are being provided – to shift perceptions of skilled trades among Ontario youth?
- How does the government plan to address the staffing issues that may result in certain regions. The proposed Equivalent Apprenticeship Learning Model outlines check-ins with potential school- and board-level co-ordinators. However, these are not available in every board. In such cases, would funding be provided to ensure that a qualified teacher is made available to serve as the student's contact point?

7. WORKS CITED

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