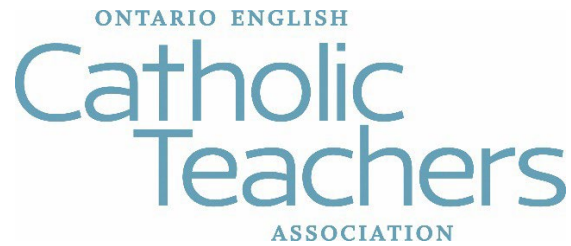


Proposal for Regulations Under the *Education Act*, Related to School Boards and Local Police Services

Submission to the
Ministry of Education



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.

René Jansen in de Wal
President

David Church
General Secretary

Ontario English Catholic Teachers' Association
65 St. Clair Avenue East, Suite 400
Toronto, ON M4T 2Y8
416.925.2493 or 1.800.268.7230
Fax: 416.925.7764
catholicteachers.ca

February 2026

TABLE OF CONTENTS

1.	INTRODUCTION	1
2.	EQUITY AND HUMAN RIGHTS CONCERNS.....	3
	Police Presence as a Response to School Violence.....	5
3.	RESPECTING COLLECTIVE AGREEMENTS	6
4.	MANDATORY POLICE ACCESS AND PARTICIPATION IN SCHOOL PREMISES AND PROGRAMS	7
5.	GAPS IN OVERSIGHT ACCOUNTABILITY, AND OPT-OUT MECHANISMS	8
6.	POTENTIAL IMPLICATIONS ON WORKING CONDITIONS AND TEACHERS' RIGHTS	10
7.	FAILURE TO MEANINGFULLY CONSULT.....	11
8.	CONCLUSION	13
9.	WORKS CITED	14

INTRODUCTION

The Ontario English Catholic Teachers' Association (OECTA) welcomes the opportunity to provide input on behalf of 45,000 teachers working in publicly funded Catholic schools in Ontario, in response to the government's proposed regulations under the *Education Act*, related to school boards and local police services.

The proposed regulations follow Bill 33, *Supporting Children and Students Act, 2025*, which received royal assent on November 20, 2025. The proposed regulations currently under consideration are intended to operationalize aspects of Bill 33, and focus on the new legal relationship between school boards and police services.

In particular, the proposed regulations have four key areas of focus, that would:

- Mandate school boards to provide local police services with access to school premises and permit their participation in a broad range of school activities, events, and programs, including student safety initiatives, emergency preparedness drills, student well-being programs, mentorship and youth engagement activities, and programs intended to build relationships between police and students.
- Require school boards to permit police participation in school events such as career days, extracurricular activities, and community events, whether held on or off school premises, and whether officers are in uniform or plainclothes.
- Formalize the implementation of school resource officer (SRO), or youth engagement officer, programs through a memorandum of understanding (MOU) with local police services, to set out expectations regarding relationship-building, information sharing, communication with students and parents, and involvement of students and families in program implementation.
- Prohibit school boards from making police participation in school activities conditional on school board approval of materials, and would deem boards to have met their statutory obligations where good faith efforts have been made but police services are unable to participate.

Catholic teachers recognize the important role police services play in responding to emergencies and supporting community safety, and we support collaborative approaches that promote safe, healthy, and inclusive school environments for students and staff. In addition, Catholic teachers understand that some school boards may wish to implement SRO programs – which should involve meaningful public consultation with local stakeholders and community members, including Indigenous and equity-deserving communities.

However, the Association has serious concerns that the proposed regulations would significantly expand and normalize police presence in schools in ways that are overly broad, insufficiently defined, unsupported by evidence, and potentially harmful to certain groups and individuals.

If these measures are intended to support engagement, mentorship, and relationship-building between police and school communities, then meaningful consultation with education partners is not optional – it is essential. A model based on imposition rather than collaboration will undermine trust and defeat the objectives. Dialogue, transparency, and mutual respect must be foundational to any such relationship. As drafted, the proposed regulations leave significant gaps and unresolved questions.

For instance, there is a well-documented body of research that highlights the equity, human rights, and privacy impacts associated with increased police presence in schools, especially as it pertains to Indigenous and equity-deserving students and staff. As such, the lack of safeguards, opt-out mechanisms, or accountability measures in the proposed regulations threaten to create disproportionate psychological harm that undermines a safe learning environment.

At the same time, Catholic teachers must also highlight the potential that these proposed regulations could lead to – or be construed as – overriding or interfering with collective agreements.

Taken together, these concerns call into question whether the proposed regulations advance student safety and well-being in a manner that is reasonable, evidence-based, and consistent with the purpose of publicly funded education and the rights and values articulated in the *Canadian Charter of Rights and Freedoms*.

The following sections outline several areas of concern, and recommendations. They include:

- Equity and human rights concerns
- Respecting collective agreements
- Mandatory police access and participation in school premises and programs
- Gaps in oversight, accountability, and opt-out mechanisms
- Potential implications on working conditions and teachers' rights
- Failure to meaningfully consult

EQUITY AND HUMAN RIGHTS CONCERNS

Research has clearly demonstrated that police presence and surveillance inside schools has a disproportionate negative impact on Indigenous, Black, and other equity-deserving students.

A recent study published by the Ontario Human Rights Commission (OHRC) found that “Police in schools may subject Black and other racialized children, and particularly Black boys, to a higher level of surveillance that could ultimately significantly impact their mental health and education” (OHRC 2025).

Without explicitly confronting this reality in the policy’s design, increased police presence and SRO programs may subject Indigenous, Black, and racialized students to heightened surveillance, and contribute to a disproportionate criminalization – not because of behaviour, but because of systemic racism embedded in surveillance and enforcement practices (Maynard 2017). This, in turn, can create or exacerbate an erosion of trust between students and school staff (Sheikh et al. 2024).

Numerous reports and case studies have drawn similar conclusions, both in Canada and internationally:

- Students who are Black, Indigenous, Latinx, and/or disabled are more likely to be suspended, expelled, or arrested when local police officers are present in schools, such as through SRO programs. In addition, minor misbehaviours – such as tardiness and dress code violations – are more likely to lead to police involvement (ACLU 2020).

- Racialized and 2SLGBTQIA+ students report feeling less safe and more surveilled with SROs present, and SRO presence can erode trust between students and school staff (Sheikh et al. 2024).
- In *Policing Black Lives*, Robyn Maynard argues that Black youth in Canada are oversurveilled in schools, contributing to their disproportionate criminalization – not because of their behaviour, but due to systemic racism and surveillance (Maynard 2017).

Mandating SRO programs and police presence in schools for a broad variety of events sends a clear message that these critical voices do not matter and ignores the historical evidence that such programs face significant challenges in building a sense of community between police and students.

Over the last decade, many school boards in Ontario and across Canada have chosen to end SRO programs after listening to experts and the voices of students, particularly those from Indigenous, Black, and other equity-deserving groups who often felt surveilled and unsafe by the presence of police in schools.

Teachers share an interest in the success of any program that can support students and schools. That is why Catholic teachers urge the government to show respect for the research and the concerns of education partners, and to remove the mandate that would provide local police services with access to school premises and permit their participation in a broad range of school activities, as well as the mandate to implement SRO programs.

Instead, we urge the government to encourage and empower school boards to engage in meaningful consultation with stakeholders, including education unions, government agencies such as the OHRC, advocacy groups, students and families from Indigenous, Black, and equity-deserving communities, as well as recognized experts in education equity.

Meaningful consultation and partnership must be central to any decisions that are made regarding police presence in schools.

At the same time, to better understand the relationship between police services and students, the Association once again recommends the government take a more dedicated

and substantive approach to disaggregated, demographic-based data collection.

If the goal is to improve the school community and learning environment, then any effort by school boards to collect equity-related data must involve a standardized approach, consider cultural relevance and responsiveness, include trauma-informed principles, respect the *Charter* rights of students, including their right to privacy, and achieve the highest standards of data collection integrity – results must also be made available in an accessible form to all relevant stakeholders and community members.

Police Presence as a Response to School Violence

Minister of Education Paul Calandra has suggested that mandating police presence in schools could serve as a solution to the critical issue of violence on school premises. Unfortunately, this view fails to understand or address the root causes of violence in schools.

The issue of violence in schools is complex and challenging. There is no simple answer. Addressing this matter requires a multifaceted, comprehensive, and co-ordinated response. An act of violence is often a form of communication usually arising from a lack of resources to meet student needs. It has, as its basis, a multitude of intertwining factors – everything from inadequate access to mental health resources, to large class sizes, to a lack of special education supports, to the defunding of before- and after-school programming, and more, play a role.

However, there is a consistent theme to each of these, which has contributed to the rise in violence and harassment: chronic underfunding of publicly funded education (Bond and McAllister 2024). There are a number of actions the government can take immediately to begin to address the issue of school violence. If the government sincerely wants to address the issue of violence in schools, Catholic teachers are prepared to share our experience and expertise to inform far more effective approaches.

For instance, Catholic teachers call for the government to lower class sizes and provide resources and supports for more frontline, school-based child and youth workers, educational assistants, social workers, psychologists, and other professional services to help students and education workers deal with their social, emotional, and behavioural needs, in some cases attributable to pandemic-related causes.

We also urge the government to work meaningfully with education unions and other key stakeholders to proactively support students or staff who are in crisis, by developing a whole-school approach to addressing incidents of violence, which includes follow-up actions to prevent recurrence – including providing teachers and school staff with comprehensive trauma-informed training.

Catholic teachers once again call on the government to work across relevant ministries and with education stakeholders to develop sector-specific regulation for education under the *Occupational Health and Safety Act*.

RESPECTING COLLECTIVE AGREEMENTS

The proposed regulations introduce substantial changes to the school environment that could directly affect teacher working conditions; yet they do so without expressly acknowledging or protecting collective agreements and collective bargaining rights.

The presence and activity of police in schools is a matter that is subject to collective bargaining, particularly in regard to the authority of the police over students – and ultimately teachers. This three-pronged power dynamic is surely to have implications concerning the legal relationship between the police and teachers.

As a result of these serious implications, OECTA must play an important and meaningful role in shaping this relationship, whether it be through collective agreements or developing regulations.

Catholic teachers insist that the regulations expressly confirm that they do not override, diminish, or interfere with any collective agreements. Any interpretation to the contrary could potentially violate section 2(d) of the *Charter*. Where collective agreement rights and obligations are at stake, consultation with the Association is not an adequate substitute for compliance.

MANDATORY POLICE ACCESS AND PARTICIPATION IN SCHOOL PREMISES AND PROGRAMS

As drafted, the regulations establish expansive access for police services, without any evidence that such action is grounded in educational or student well-being.

The list of mandated activities – which includes “student well-being programs,” “learning and mentorship programs,” “youth engagement programs,” and “programs to build relationships between local police services and students” – is exceptionally broad and undefined.

In essence, police participation could extend into any aspect of school life, regardless of developmental appropriateness, pedagogical relevance, or community context. The absence of definitions within the proposed regulation creates ambiguities, which threatens to lead to inconsistent interpretation and application across school boards.

Further, these categories encompass core educational and support functions traditionally delivered by teachers (including guidance teachers), child and youth workers, social workers, and community partners.

It should also be noted that by requiring school boards to permit police access, the regulation bypasses the benefits of partnership – removing the ability of locally-elected trustees, school administrators, teachers and education workers, and school communities to determine whether police presence is appropriate or welcomed in particular contexts. This would be especially problematic for communities that have rescinded SRO programs, following consultation, based on input that police presence causes harm or distress among particular student and staff populations.

Taken together, these provisions disregard the principle of subsidiarity and the value of local school-community autonomy, undermine professional judgment, and risk introducing policing into spaces that should prioritize care, learning, and developmental support. This approach is inconsistent with trauma-informed and rights-based educational practice, and is not a framework for success.

As such, the Association urges the government to amend the regulation in order to limit mandatory police access to schools to clearly defined, exceptional circumstances related to

genuine safety needs (e.g., emergency response, imminent threats, or clearly defined emergency preparedness training), rather than broad and routine participation in educational, well-being, or relationship-building activities.

Notably, the proposal would prohibit school boards from requiring approval of materials used by police in schools. This is an unprecedented departure from established practice, effectively preventing boards from vetting, controlling, or regulating third-party materials presented to students on school premises. At the same time, the proposed regulations place the full burden of responsibility and liability on school boards, while imposing no corresponding legal obligations on local police services.

Catholic teachers also urge the government to take advantage of the valuable local expertise of school boards and school communities, and to preserve meaningful discretion at both the board and school levels.

The government must ensure that school boards, in consultation with school administrators, education unions, frontline teachers and education workers, school councils, and community members, retain the authority to determine whether police participation is appropriate for specific activities or events in a broader context, taking into account local circumstances, student needs, and community history.

GAPS IN OVERSIGHT ACCOUNTABILITY, AND OPT-OUT MECHANISMS

The proposed regulations lack meaningful mechanisms for oversight, accountability, or redress in relation to police conduct in schools.

There is no requirement for independent monitoring of police involvement, no standardized complaint processes for students, families, or teachers and education workers, and no clear consequences for inappropriate actions within school settings. It is unclear if this is an oversight or a failure to understand the impacts of such programs, but the Association regards this as a critical consideration.

This absence of oversight is particularly concerning given the power imbalance inherent in police-student interactions, and the vulnerability of children and youth. While school boards and educators are subject to legal, professional, and employment accountability, police

participation in schools appears largely insulated from comparable scrutiny or consequences within the publicly funded education system. It is unclear as to why this would be the case, as – currently written – the proposed regulations threaten to create a system of asymmetrical accountability.

Equally troubling is the absence of any requirement for meaningful consent or opt-out mechanisms for students and families. School boards are obligated to make students and parents/guardians aware of SRO programs and related police involvement; however, the regulation does not require consent for participation, nor does it provide protections for students who do not wish to engage with police.

This is particularly harmful for students from Indigenous and equity-deserving communities, who may have lived experiences of police violence or systemic discrimination, as well as for students whose individual circumstances make police interaction distressing or unsafe. If community- and relationship-building are among the government's stated objectives, this cannot be achieved successfully through imposition.

Finally, the regulation requires school boards to work with police services to share “general information about the school population and local community.” The term “general information” is undefined in the regulation, and raises potential concerns regarding student privacy, data protection, and compliance with existing privacy legislation – including the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA) and, where applicable, Personal Health Information Protection Act (PHIPA).

Without clear limits, this provision could result – intentionally or not – in the sharing of demographic, socio-economic, or other sensitive information in ways that stigmatize communities or contribute to profiling.

In short, there could be serious human rights and privacy concerns about sharing personal information – and indeed, it could constitute an unreasonable search and seizure by police contrary to s. 8 of the *Charter*.

Catholic teachers call on the government to require independent oversight of police participation in schools, including monitoring, reporting, and evaluation separate from both school boards and police services. As part of this process, the government should consult

meaningfully with education unions, the OHRC, and the Privacy Commissioner, among others. Ultimately, teachers, education workers, students, and families must have access to transparent, accessible, and trauma-informed complaint processes when concerns arise regarding all programs that involve police presence within schools.

POTENTIAL IMPLICATIONS ON WORKING CONDITIONS AND TEACHERS' RIGHTS

The expanded and mandatory presence of police in schools will almost certainly alter supervision dynamics, classroom climate, and student-teacher relationships. Whether intentional or not, teachers may find themselves in situations where they are expected – formally or informally – to manage interactions between students and police, respond to student fear or distress arising from police presence, or address parent and community concerns regarding policing in schools. These responsibilities fall outside teachers' professional training and job descriptions and create new risks and liabilities.

Moreover, the regulation provides no requirement for training or protocols to support educators in navigating these interactions, nor does it clarify lines of authority and responsibility between educators and police. This lack of clarity increases the risk of conflict, misunderstanding, and harm to both students and staff. A program predicated on building relationships cannot ignore this problem.

The introduction of routine police presence affects the psychosocial work environment and may exacerbate stress, particularly for teachers from Indigenous or equity-deserving communities or those working with vulnerable student populations. Yet there has been no consultation with unions, no impact assessment, and no recognition of existing collective agreement provisions related to workplace safety and professional judgment.

The role of teachers in any relationship, communication, or interaction between students and police must be clearly and expressly defined in the collective agreement and/or regulations. Without such clarity, teachers may be placed in inappropriate and prejudicial situations for which they are not trained or qualified, creating unacceptable risk of employment consequences and/or professional discipline.

Further, where police are present in schools, government must fund and provide training for teachers and education workers on protocols and rights-based approaches, and how to

support students who may experience distress related to police presence. At the same time, school boards should be required to assess and mitigate the psychosocial health and safety impacts of police presence in schools, in compliance with occupational health and safety legislation.

Taken together, meaningful consultation is critical to ensure these gaps are identified and addressed. If they remain unresolved, they will undermine the stated objectives of these programs – including effective implementation, trust and relationships within school communities, and ultimately student and school safety.

FAILURE TO MEANINGFULLY CONSULT

Meaningful, locally informed collaboration is a hallmark of world-class publicly funded education systems. It anchors decision-making in lived experiences and community context – something that centralized, top-down approaches cannot replicate.

Against that backdrop, the proposed measures should be regarded as deeply problematic. They threaten to override years of locally driven, community-based decision-making regarding police presence in schools, including decisions reached through extensive consultation with students, parents, educators, and equity-deserving communities.

It should be noted that many Ontario school boards previously suspended or terminated SRO programs based on evidence of harm and opposition from local school communities. The proposed regulations disregard those processes and re-impose policing through centralized mandate, undermining public trust in the publicly funded education system and in democratic governance more broadly.

In addition, a fundamental flaw with the proposed regulations is that Bill 33 does not indicate what are the legislative objectives for the provisions requiring this new relationship between school boards and local police services.

As far as the Association is aware, there are no studies or reports that the government conducted or relied upon in establishing a new relationship between school boards and the police, and imposing additional legal obligations on school boards as it relates to the police.

The Association was not consulted prior to the introduction of the proposed regulations – nor is there evidence that any students, teachers, unions, parents and guardians, or affected communities were meaningfully consulted, as well. The absence of such consultation is particularly troubling given the profound implications for student rights, teacher working conditions, and school culture.

Teachers and education workers across Ontario are increasingly frustrated by initiatives – even well-intentioned initiatives – that fail to achieve their objectives because they are imposed without meaningful collaboration, and without respect for the experience and professional expertise of the teachers who dedicate their careers to serving students and school communities.

Catholic teachers want students to thrive, feel safe at school, and learn healthy relationships within their communities. If these are truly shared objectives, then partnership, mutual respect, and genuine dialogue are not optional – they are essential to success.

Effective education policy must be developed collaboratively, informed by evidence and lived experience. These regulations instead reflect a top-down approach that prioritizes policing over prevention, enforcement over support, and central control over local experiences. The government should suspend implementation of the proposed regulations until meaningful consultations are conducted with teachers' unions, students, parents, school boards, equity experts, and Indigenous and equity-deserving community stakeholders.

As part of this process, the Ministry of Education should, in collaboration with education affiliates and experts, conduct a province-wide equity and human rights impact assessment of police presence in schools, with findings publicly released and used to inform any future regulatory framework.

Following from this, the regulation should allow school boards to opt out of police participation or SRO programs where local consultations have demonstrated harm or strong opposition from school communities.

Finally, rather than pursuing additional police presence in schools, Catholic teachers once again call on the government to prioritize funding for smaller class sizes and evidence-based student supports – such as guidance counsellors, child and youth workers, social workers,

and mental health professionals – rather than embedding police in school environments. As the Conference Board of Canada (2019) has noted, every dollar invested in publicly funded education generates approximately \$1.30 in economic return – making education one of the strongest investments Ontario can make in its future prosperity.

CONCLUSION

The proposed regulations under the *Education Act* represent a significant and concerning expansion of police presence and authority in Ontario schools. As drafted, they prioritize policing over prevention, enforcement over care, and centralized mandate over local democratic decision-making.

They lack clear limits, meaningful safeguards, and evidence-based justification, while exposing students – particularly those from Indigenous and equity-deserving communities – and teachers to increased risk, surveillance, and harm.

The proposed regulations also fail to respect professional autonomy, collective bargaining rights, and the established role of schools as supportive, inclusive, and learning-centered environments.

Catholic teachers urge the government to pause implementation and engage in meaningful consultation with education affiliates, students, families, and communities.

Any regulatory framework governing police involvement in schools must be narrowly tailored, transparent, accountable, and grounded in equity, human rights, and sound educational practice. Ontario's publicly funded schools are best made safer not through the normalization of policing, but through collaborative community partnerships and sustained investment in student supports, mental health services, and the professionals who work every day to build safe, trusting, and inclusive school communities.

WORKS CITED

American Civil Liberties Union (ACLU). (2020). "Police in Schools Continue to Target Black, Brown, and Indigenous Students with Disabilities. The Trump Administration Has Data That's Likely to Prove It." *ACLU* (July 9).

Bond, Meredith, and McAllister, Mark. (2024). "Ontario called on to do more to combat school violence as some teachers forced to wear protective gear." *CityNews* (October 23).

Canadian Charter of Rights and Freedoms. Part I of the *Constitution Act, 1982*, Schedule B to the *Canada Act 1982* (UK), 1982, c 11.

Conference Board of Canada. (2019). *The Economic Case for Investing in Education*. Toronto: Conference Board of Canada Report (June).

Maynard, Robyn. (2017). "Canadian Education Is Steeped in Anti-Black Racism," *The Walrus* (November 29).
Occupational Health and Safety Act, R.S.O. 1990, c. O.1.

Ontario Human Rights Commission (OHRC). (2025). *Dreams Delayed: Addressing Systemic Anti-Black Racism and Discrimination in Ontario's Public Education System*. Toronto: King's Printer for Ontario.

Sheikh, Sidra, Stolberg, Alexis, and Gilmour, Allison F. (2024). "Investigating Advanced School Surveillance Practices and Disproportionality: A Systematic Review." *Urban Education*, 0(0).