



**ONTARIO PUBLIC  
SCHOOL BOARDS'  
ASSOCIATION**

**Leading Education's Advocates**

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Michael Barrett  
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Attn: Ministry of Labour

**OPSBA Submission Regarding An Integrated  
Occupational Health and Safety Strategy for Ontario**

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.

OPSBA has been an active participant in the Occupational Health & Safety conversation and has contributed to several legislative and regulatory changes in the past few years. These include:

- Submission regarding Bill 168 *Occupational Health and Safety Amendment Act (Violence and Harassment in the Workplace)*, 2009
- Submission regarding Bill 160 *Occupational Health and Safety Statute Law Amendment Act*, 2011
- Submission to the regulatory proposal regarding mandatory Occupational Health and Safety Awareness Training Programs in February 2012

In addition, OPSBA reviewed and discussed the Ministry of Labour report from the Expert Advisory Panel on Occupational Health and Safety in December 2010.

Currently, we are working with the Ministry of Education and the Council of Ontario Directors of Education's (CODE) Health and Safety team to identify "a common set of provincial health and safety promising practices, developed from existing resources and best practices in existing programs, for use in technological education facilities and science labs."

This particular consultation document was discussed recently among OPSBA's Policy Development Work Team. Our members agree, and as noted from our involvement above, that 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.

As a main employer within the education sector, school boards are safety leaders. They have strong policies and procedures in place to address occupational health and safety concerns, which includes training for their employees and for students in co-op placements. Also, most school boards have Health & Safety Professionals who connect regularly with their counterparts across the province to ensure consistency in best practices. It should also be noted that school boards have employees who are members in several union groups, who all work cooperatively with the board on these issues.

School boards are unique employers in the way that the school learning environment is a different type of workplace. This consultation paper addresses the needs of workers who are vulnerable, part of a small business, who work in highly hazardous worksites and are exposed to possible occupational diseases.

While we appreciate the work and focus being paid to these workers and their workplaces, we again, request that school boards need to be considered separately when implementing these types of strategies. This request was most recently stated in our submission to Bill 168. We continue to recommend that the Ministry of Labour create a separate and distinct Education Sector Regulation under the Occupational Health and Safety Act, similar to what currently exists for the Health Sector (Ontario Regulation 67/93 Health Care and Residential Facilities).

We would be pleased to meet with Ministry of Labour representatives to discuss this proposal at any time.

Sincerely,

A handwritten signature in black ink that reads "Michael Barrett". The signature is written in a cursive style with a long horizontal flourish extending to the right.

Michael Barrett, President  
Ontario Public School Boards' Association