



OPSBA Black Trustees' Caucus Submission to the Standing Committee on Social Policy re: Bill 101, Putting Student Achievement First Act, 2026

April 27, 2026

This submission is offered in a spirit of collaboration and shared responsibility. The Black Trustees' Caucus (BTC) supports the government's stated goal of strengthening student achievement across Ontario and recognizes the intent to improve system coherence, accountability, and outcomes.

Ontario's publicly funded education system is widely regarded as a global leader. This reputation has been built through a combination of:

- a strong commitment to public education as a public good
- balanced governance structures that connect provincial direction with local accountability
- a foundation in human rights and equity, ensuring all students have the opportunity to succeed

Bill 101 introduces significant changes across governance, operations, accountability, and system leadership. These reforms seem to reflect a shift toward a more centralized model of school board operation, including strengthened executive authority, significantly reduced trustee influence, and increased provincial control over decision-making.

This moment presents both an opportunity and a responsibility to ensure that these changes strengthen, not unintentionally narrow, the conditions that have made Ontario's system effective.

As trustees we still have some unanswered questions, and have offered some possible suggestions to address them below:

1. What do we mean by "student achievement" in this bill? Does it include well-being, belonging, and engagement, or are we focusing mainly on academics?
2. If school climate surveys are removed, what will replace this data so that student voice is accurately captured?
3. How will we know if these changes are working for all students? Will there be clear, public reporting using disaggregated data to show whether achievement gaps are closing, and improving outcomes for students facing the greatest barriers?
4. How will decisions remain responsive to local needs in a more centralized system?
5. What role will trustees play in holding the system accountable?

Aligning Structural Changes With Student Outcomes

Across all elements of Bill 101, a central question remains:

How will these structural and governance changes improve outcomes for students, particularly those who have been historically underserved?

Evidence from high-performing systems, Canadian research, and the *Dreams Delayed* report consistently shows that strong outcomes are achieved when systems are:

- grounded in human rights
- evidence-informed
- responsive to student experience
- supported by transparent and accountable governance

A key consideration raised in our analysis is that a shift toward a model focused on efficiency, central control, and operational compliance, may risk narrowing the purpose of public education if not balanced with equity, voice, and community responsiveness.

Our suggested recommendations are as follows:

1. Student Achievement and Provincial Direction

Bill 101 expands the Ministry's authority to define and direct student achievement.

While this may strengthen alignment, high-performing systems demonstrate that achievement must be defined broadly. Canadian evidence confirms that belonging, well-being, and engagement are directly linked to academic success.

Suggested approach:

- Co-develop a provincial definition of student achievement that includes:
 - Academic outcomes
 - Well-being and belonging
 - Engagement and attendance
 - Identity affirmation

Establish disaggregated provincial data collection and public reporting to ensure system improvements reflect substantive equality.

2. Governance, Trustee Role, and Centralization of Authority

Bill 101 introduces:

- reduced trustee representation
- increased ministerial authority
- expanded executive leadership structures
- transfer of bargaining authority away from trustee organizations

These changes reflect a shift toward a more corporate-style governance model, where operational authority is concentrated in executive leadership and provincial oversight.

While this may increase efficiency and consistency, international evidence shows that strong education systems maintain local democratic voice alongside central coordination.

Suggested approach:

- Preserve and strengthen the governance role of trustees in:
 - Oversight
 - accountability
 - community representation
- Ensure formal mechanisms for local input and adaptation
- Ensure sufficient resources to facilitate capacity-building and representation
- Maintain a clear distinction between:
 - Governance (trustees)
 - Operations (staff and ministry)

Public education is not solely an operational system, it is a democratic institution.

3. Executive Leadership and Model Shifts

Bill 101 formalizes a model where:

- Directors of Education function as Chief Executive Officers
- leadership roles are divided between operational (CEO) and educational functions (CEdO)
- business qualifications and financial oversight are emphasized

This aligns with a corporate governance structure, where efficiency, compliance, and financial control are prioritized.

Key consideration:

While operational efficiency is important, education systems are not businesses. Their success is measured not only by outputs, but by equitable outcomes, relationships, and long-term societal impact.

Suggested approach:

- Ensure leadership structures explicitly include:
 - equity accountability
 - student well-being outcomes



- Embed human rights obligations into executive performance measures
- Balance operational efficiency with educational purpose and student experience to support development of the Multi-Year Strategic Plan

4. Financial Oversight, Capital Control, and Asset Management

Bill 101 increases ministerial authority over:

- board budgets
- expenditures
- land acquisition and capital planning
- project approvals and oversight

While strengthening accountability, this centralization introduces risks if not balanced with local context.

Suggested approach:

- Align financial decisions with student outcome data and equity needs
- Ensure capital planning reflects:
 - community demographics
 - access and inclusion
 - long-term system sustainability that is supported by trustee representation and involvement
- Maintain transparency in land and asset decisions to protect public trust

Fiscal responsibility is strongest when it is evidence-based and publicly accountable.

5. Communications and Public Transparency

Bill 101 enables the ministry to establish policies governing board communications.

While consistency is important, overly centralized communication can:

- limit local context
- reduce transparency
- weaken community trust

Suggested approach:

- Ensure boards retain the ability to:
 - communicate local realities

- share equity priorities
- report on student outcomes
- Establish communication standards that promote:
 - clarity and accuracy
 - transparency
 - community engagement

Public trust is sustained through open and responsive communication.

6. Student Voice and School Climate Data

Bill 101 removes the requirement for school climate surveys.

This represents a significant shift away from one of the system's most important tools for understanding student experience.

Evidence shows that:

- belonging and safety are key drivers of achievement
- experiences of racism and exclusion are often underreported without structured data

Suggested approach:

- Maintain or replace with a standardized provincial student voice mechanism
- Ensure data captures:
 - belonging
 - well-being
 - discrimination and safety
- Require linkage to system planning and accountability

Without student voice, systems risk becoming less responsive and more reactive.

7. Labour Relations and Central Bargaining Changes

Bill 101 shifts central bargaining authority to a provincial agency led by system directors rather than trustee associations.

This represents a significant governance shift, reducing the direct role of trustees in labour relations.

Suggested approach:

- Ensure bargaining structures remain:
 - transparent
 - responsive to local context
- Maintain clear lines of accountability between:
 - provincial direction
 - local implementation
- Monitor impact on:
 - educator engagement
 - system responsiveness

8. Equity, Data, and Human Rights Accountability

While Bill 101 introduces structural reforms, it does not yet fully articulate a system-wide equity accountability framework.

Dreams Delayed is clear that progress requires:

- standardized data
- outcome-based accountability
- monitoring of disparities

Black Trustees’ Caucus position and suggested approach:

- Implement a provincial disaggregated data framework
- Publicly report on:
 - achievement gaps
 - pathways and graduation
 - discipline and engagement
- Align implementation with:
 - Graduation Coaches
 - Student and Family Advocates
 - a provincial monitoring framework

This ensures alignment with the Ontario Human Rights Code.

9. Implementation, Monitoring, and System Impact

Bill 101 represents a significant system shift toward:

- centralization
- executive leadership
- operational control

Such shifts can streamline decision-making but may also reduce local responsiveness if not carefully balanced.

Suggested approach:

- Implement a phased approach with clear milestones
- Establish a provincial monitoring framework tied to student outcomes
- Provide:
 - professional learning
 - data tools
 - ongoing feedback mechanisms
- Engage boards, communities, and partners in co-development

Strengthening Public Education Through Balance

Bill 101 presents an opportunity to strengthen Ontario's education system. Its success will depend on achieving the right balance between:

- efficiency and substantive equality
- central coordination and local voice
- operational control and democratic accountability

Ontario's strength has never come from operating schools as businesses alone. It has come from building a system that is:

- publicly accountable
- grounded in human rights
- responsive to students and communities

The Black Trustees' Caucus remains committed to working collaboratively with government to:

- share governance expertise

- bring forward community-informed perspectives
- support effective and equitable implementation

The shared goal remains clear:

A publicly funded education system where every student experiences achievement, belonging, and well-being, without exception.