



## **Submission to the Ministry of Education on Accelerated Apprenticeship Pathway Consultation**

The Ontario Secondary School Teachers' Federation (OSSTF/FEESO) was founded in 1919. OSSTF/FEESO represents over 60,000 public high school teachers, occasional teachers, educational assistants, instructors, psychologists, secretaries, speech-language pathologists, social workers, plant support personnel, and many other educational workers.

OSSTF/FEESO is pleased to provide its submission to the Ontario Ministry of Education on the Accelerated Apprenticeship Pathway Consultation.

### **1. From the perspective of your organization, what are the strengths and weaknesses of model 1? Which of these strengths should be included in the final model implemented?**

The leading position of OSSTF/FEESO is that students should not be encouraged to leave school early. In terms of addressing the two objectives identified in this consultation:

Conceptually, the Federation could support some efforts that would yield higher rates of access to skilled trades pathways. However, it is our perspective that better information and outreach for both prospective students and their parents should be the focal point, particularly to bridge persisting gaps in awareness with respect to: potential earnings for skilled trades; timelines and requirements for entering into and completing apprenticeships; the flexibility and other working realities of skilled trades workers versus other career pathways; and the elimination of attitudinal barriers that have historically had an attenuating impact on young people accessing skilled trades pathways in Ontario.

In terms of the other objective identified in this process, which is to address labour market supply challenges, the Federation stands by submissions already published by other stakeholders, in that it believes: (a) these labour market supply challenges would be better addressed by investments and structural amendments to improve existing programs; and (b) that this "Accelerated Apprenticeship Pathway" will actually create and/or exacerbate challenges in the skilled trades sector.

As educators, we fundamentally believe that adolescents should not be thought of as a means to fill labour shortages like those described in the objectives of this consultation. However, for the purpose of responding to the particularized request to provide feedback on these specific proposed models, we propose without prejudice to our overall position that Model 1 (Equivalent Apprenticeship Learning) is superior to Model 2 (Employer Supervised Apprenticeship).

### Strengths of “Equivalent Apprenticeship Learning” Model

The most significant strength of this model over the Employer Supervised Apprenticeship model is that access to school services and resources will offer exceedingly better supports and community for students at this age, as well as a better range of opportunities for transitioning into alternative pathways should an apprenticeship not be the right fit.

The model offers the possibility of regular check-ins with certified teachers, through a school-based setup that will offer some familiarity for the student. Additionally, it also offers a Supervised Equivalent Apprenticeship Learning (SEAL) Committee that would support students in transitioning to other programs should an apprenticeship pathway not work out—which, notably, is a likely outcome given the statistically low completion rates of apprenticeships. The SEAL committee also contemplates worksite visits to ensure health, safety, and accessibility appropriateness for the student, which provides some assurances for the student, their parents, and the school community supporting them.

This model also allows students to work towards earning their Ontario Secondary School Diploma (OSSD), which is crucial from both our perspective and given the feedback from skilled trade unions on upskilling, employability, and the positive influence that earning the OSSD has historically had on apprenticeship completion rates.

We feel it is of paramount importance that doors are left open for students should their pathways or prospects change. Career paths are not static, and secondary guidance counsellors are experts at assisting students to navigate through options that intersect interests and career opportunities. Keeping a clear link with the school community and open access to its supports, as well as having students working towards earning their OSSD, is essential.

### Weaknesses of “Equivalent Apprenticeship Learning” Model

That said, there are significant weaknesses with this model. For example, working full-time and then having to complete equivalent learning components remotely, after work hours, or during common vacation periods is going to be very difficult for students at that age, and is very likely to contribute to failure rates.

There is also a shortage of technology teachers, with no insight as to how to incentivize more skilled trades to enter the teaching profession. As a result, there will be less certified technology teachers, professionally trained in pedagogy, available to share their knowledge and experience in ways that effectively connect with young people in schools—whether there is a Supervised Equivalent Apprenticeship Learning Committee or not.

The Federation also shares significant concerns about 16-year-olds entering the world of full-time work as apprentices in skilled trades, for many reasons. From a safety perspective, other existing programs in schools ensure there is appropriate focus on workplace health and safety taught by those with expertise in teaching adolescents, who understand their heightened vulnerability to risky and reckless behaviour.

From a technical skills perspective, the Federation shares the view of skilled trade unions that students in many of the available apprenticeships will experience significant challenges in completing the in-school portion of their trades training with only having completed grade 10.

Skilled trades have evolved with advancements in technology, and apprentices are expected to have math and language skills that only come with the completion of a high school education. They will be denied the ability to engage in OSSD core courses (English, Math, Social Sciences) in grades 11 and 12. The senior years of high school represent a time for synthesis and the culmination of learning in these core areas, thus developing the critical thinking necessary to excel in any career pathway, including apprenticeships for a skilled trade.

**2. From the perspective of your organization, what are the strengths and weaknesses of model 2? Which of these strengths should be included in the final model implemented?**

Again, for the purpose of responding to the specific ask of this consultation, which is to provide targeted feedback on only these proposed models, we propose that Model 2 is inferior to Model 1.

Weaknesses of “Employer Supervised Apprenticeship” Model

In this model, students will not be considered pupils of a school board, and so will not be able to access school-based supports. This means that assistance will only be afforded through a local apprenticeship office. It is a significant negative that there will be no resources available to students through the familiarity of a school setting at this crucial stage in their adolescent development.

In addition, no secondary school credits would be earned by the student for their apprenticeship experience while they work towards their Certificate of Apprenticeship. In other words, should an apprenticeship pathway not work out (which, again, is a likely outcome given the low completion rates of apprenticeships), students will not have earned credits towards their OSSD. There is only a capacity for accessing accreditation through Prior Learning Assessment Recognition (PLAR), but only via a mechanism which is yet to be jointly developed by the Ministry of Education, the MLITSD, and Skilled Trades Ontario. The process for jointly creating this mechanism is likely to be ripe with disagreement, and again, there is no sense of whether PLAR would even apply for students who are transitioning out of an apprenticeship without completing it.

With no supports available from schools under this model, and with what appears to be no capacity built into the model to facilitate students transitioning between pathways or other secondary programs should an apprenticeship not work out, this model is likely to leave many students behind.

Simply stated, to improve completion rates for any career pathway, a process must provide supports for, and center, the individual – not market-driven or business-driven interests.

For example, more successful international vocational programs achieve higher status and recognition in their respective countries in no small part because they actively work at ensuring there are no dead-end choices for students. These international programs encourage further education and training at any stage of a student’s development, and also offer supportive, well-resourced opportunities for transition between academic and vocational pathways—a very stark contrast from this model, which appears to offer nothing that would facilitate such transitions.

### Strengths of “Employer Supervised Apprenticeship” Model

There are no strengths or advantages for students in this model. It proposes to completely remove adolescents from schools and all the school-based supports normally afforded to students at this crucial time in their lives. This model centers and prioritizes employer access to inexpensive labour and provides no opportunities to return to more traditional pathways, a short-sighted and extremely concerning focus given the low rates of apprenticeship completion.

### **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?**

The compulsory technology credit should be continued. Additionally, information and data that would help inform student decisions on their career pathways should be promoted and shared in an open and unbiased way.

This data should be broken down for each trade, and should reflect: both the success and transition rates of apprenticeships for different trades; the salaries of respective trades; health and safety data for different trades (e.g. WSIB claim statistics; rate of critical injuries; necessary training modules); the average anticipated costs for tools, personal clothing, safety equipment, and operating costs for workers or business owners working in different trades; and the projected investments and growth for estimating future job markets and value of different trades.

Other skilled trade unions have highlighted existing programs which center equity-based promotion of apprenticeship pathways that have enjoyed some success for historically marginalized young people. Modelling the working principles and strategic direction of organizations which have successfully bridged gaps for marginalized students to access these pathways will only serve to build a diversified and inclusive skilled trades workforce. We recommend this.

There should also be a research-based study and consultation commissioned prior to any decision made by the government to exempt the 104 skilled trades that currently require grade 12, including a focus on both the potential and real implications this will have in the sector.

Finally, to reduce the weight of the decisions students must make around the career pathways they plan to take, it would be helpful to have some pre-emptory assurances that transitioning to another pathway in their career will not be impossible should they discover that they are not suited for a skilled trade. Most importantly, it should be as plain and clear as possible to students that safeguards against meeting dead-ends do exist, and that it is absolutely normal to have a dynamic career path.

#### **b. Be effectively prepared to possibly begin an apprenticeship in Grade 11?**

Again, it is our opinion that students will not be effectively prepared to begin an apprenticeship in grade 11 and should not be encouraged to leave school early. Other skilled trades unions have also offered this commentary based on their empirical observations of young people in apprenticeships.

Rather, we propose it is best to pursue an apprenticeship either part-time or on reduced hours while still attending high school, in a more integrative way that does not force students to commit themselves fully to the apprenticeship.

**4. For model 1:**

**a. Should a student be connected to a specific school, or should they be connected at the board level only?**

Yes, students should be connected to a specific school. Their school will offer familiarity at a key moment in their adolescence, with the support of:

- Peers & community
- Caring adults with whom they have established rapport
- Safe spaces, and the generation of a sense of belonging that will help counter the isolation that many young people experience during their forays into the full-time working world
- Extra-curriculars, should that be of interest

**b. What supports would school boards be able to provide to students during their apprenticeship?**

In terms of supports, school boards would be able to provide:

- Ongoing check-ins from familiar and professional educators not only trained in pedagogy, but also with the experience of recognizing signs of student struggles with coping and mental health
- Ensuring adherence to program delivery, with well-established expertise in this type of assessment
- Employment-based advocacy, if/when necessary (site visits for health and safety; accessibility; *et cetera*)
- Built rapport with students to ensure safe and trusting spaces for sharing issues
- Mental health supports
- Resources and supports to create opportunities for dynamic career paths, whereby expert secondary guidance counsellors can help students navigate options that intersect their interests with alternative career opportunities when necessary

**c. What specific services would students need to have access to?**

Students would need to have access to:

- Guidance office for expert career advice
- The “SEAL” committee (or other joint planning committees)
- Safeguards to protect against the interruption of employment as an apprentice, which has been shown to have a significantly adverse impact on completion rates
- A network of specialized apprenticeship counsellors that have both a personal background in the trades and professional training in pedagogy, with dedicated time for counselling
- Mental health supports

**d. Are there funding implications that should be considered to support students who are participating in the accelerated apprenticeship pathway?**

Yes, including funding for things like:

- Personal tools and other necessary “startup” equipment/work gear
- Supporting community-based, Joint Apprenticeship Committees between the school board and employers and their union halls
- Guidance and other forms of counselling
- Recruitment and retention funding to address certified skilled trades teacher shortages
- Funding for inclusiveness initiatives, including seed money for creating and expanding programs that promote access to skilled trades pathways for equity-seeking students
- Funding for promotion of these pathways, to deconstruct attitudinal barriers in our society that may be precluding the attribution of higher status to skilled trades

**e. Do you have any other considerations or concerns about model 1? Are there specific additions or changes required?**

In addition to the things already mentioned, model 1 should include data collection and information sharing on the impact that these accelerated pathways have on students and the skilled trades sector. Data points could include the difference, if any, on apprenticeship completion rates, as well as rates of transition to other programs and whether students can do so effectively. Furthermore, the established joint committee meetings should be a collaborative process, with the ability for teaching professionals to provide feedback on both the successes and shortfalls of this pathway in a transparent process. Finally, students should attend to rigorous, in-person pre-apprenticeship training that focuses on health and safety in their prospective workplaces.

**5. For model 2:**

**a. What would/should be the role of school boards in this approach, if any?**

As previously mentioned, it does not seem like there is much room for school boards in this proposed model other than the potential implementation of a yet-to-be-developed PLAR mechanism.

**b. If a student decides to return to school before completing an apprenticeship, what supports would be required to facilitate reintegration of the student into the school and board?**

The student would need to have an individualized transition plan that identifies what types of supports would be necessary for them to bridge back into classes. The student would also need to have mental health supports in place, to help reorient them back into a school setting.

It would also be important to take pre-emptory measures to reinforce the normalcy of transitioning into other programs, such that it is never a stigmatizing process that instills a sense of dejection or failure in the young people of our society. Again, career paths are not

static, and it is important to anticipate this concern given the statistically low completion rates of apprenticeships.

Prospects for students under this model will be even more grim should they not complete the apprenticeship: it will be harder for a student to transition back into a school setting if they have been shut out from school supports altogether (which this pathway proposes to do), and they will not have earned any credits in their time away.

**c. What operational requirements would need to be in place for schools to excuse students?**

While this is not particularly relevant given our status in this consultation, we would simply take this opportunity to emphasize the importance of leaving flexibility for students to transition back into school and into other programs or pathways.

**d. Do you have any other considerations or concerns about model 2? Are there specific additions or changes required?**

Again, it is our opinion that students will not be effectively prepared to begin apprenticeship in grade 11. Shutting them out from access to school board services and supports is particularly concerning and will leave many students behind. There are a range of alternatives to these proposed pathways that center student interests instead of short-term labour market shortfalls, including investing and expanding existing programs and listening to the expert advice of skilled educators and practitioners.

**6. For both models:**

**a. What supports would need to be in place to ensure that students' needs related to mental health and well-being are addressed?**

To help support the decisions of young people engaged in the arduous process of configuring their career pathways, a number of supportive initiatives could be implemented to help with their mental health and well-being.

First, focusing energy on normalizing dynamic careers is important, so that if one pathway does not work out a student does not feel like a failure. Part of that involves ensuring there are easily accessible, alternative pathways to pivot to when one career pathway does not happen to work out.

In conjunction with that, positively promoting skilled trades pathways, investing in the sector, and sharing information on the trades will help shift attitudinal barriers in Ontario such that these vocations get afforded higher status, and more students will organically choose these pathways.

Sufficient orientation to full-time work will be important for students to locate themselves in their new settings, particularly at this stage of their adolescence. Keeping the community of school open and nearby will be an important part of orientation, such that students can be comforted in knowing they have a safety net in place with supports like networking, socialization, and counselling.

**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?**

Flexibility, proper assessment of individualized needs, and understanding will be key – which is yet another reason why drawing on the expertise of professional educators in the school setting is of paramount importance in looking at apprenticeship models. Educators are accustomed to accommodating students with different needs; the working world may not share the same level of experience in appropriately and effectively accommodating this reality in educating a young student body.

**7. Would model 1 or 2 be your preferred model for implementation of the accelerated apprenticeship pathway? Why?**

Neither model is preferred by OSSTF/FEESO for implementation of an accelerated pathway. Skilled trades have evolved with advancements in technology and apprentices are expected to have math and language skills that only come with the completion of a high school education. Students who move to full-time apprenticeships after grade 10 will have difficulty succeeding in a skilled trade because they lack the prerequisite knowledge and skills at that age. They will be denied the ability to properly engage in OSSD core courses (English, Math, Social Sciences) in grades 11 and 12. The senior years of high school represent a time for synthesis and the culmination of learning in these core areas, thus developing critical thinking – a skill essential for completing an apprenticeship and working safely in the skilled trades.

It is difficult as it is to get students to attend e-learning; it will be a much deeper challenge to have students attend class in the summer, at night school, and through forms of remote learning in addition to working an apprenticeship full-time. And the consequences for an adolescent who is unsuccessful in the first two years of an apprenticeship program are grim.

One of the objectives outlined in this consultation espouses that the accelerated apprenticeship pathway will “enable more students to enter the skilled trades faster and bolster Ontario’s skilled workforce.” Our belief is that adolescents should not be encouraged to leave school early, and particularly not to fill a labour market shortage without sufficient and careful consideration of what is best for them.

Instead, they should be allowed to explore interests in the trades and other subject areas while completing secondary school with their peers. Schools are integral to the development of social, personal, and critical skills, and they also offer access to critical mental health supports that many students are unable to access elsewhere.

It would be our hope that this broader consultation with stakeholder organizations will illustrate that this initiative will not achieve the objectives it identifies, as: it is not likely to improve apprenticeship completion rates; it will actually dilute the skills of workers in the sector by pulling them out of school earlier; it will create an adverse impact on their future employability; and it is likely to fail multitudes of young people by insufficiently supporting their capacity to transition to other pathways and programs when they realize an apprenticeship is simply not suited for them.