

Standing Committee on Social Policy

Sharon E. Maloney
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Good afternoon Ladies and Gentlemen.

My name is Sharon Maloney and I am the CEO of Career Colleges Ontario.

Thank you for giving me the opportunity to speak with you this afternoon about Bill 132 – the Sexual violence and Harassment Plan Act – and specifically the proposed amendments to the Private Career Colleges Act arising from it.

To begin with I want you to know that CCO is in support of this initiative and recognizes the importance of providing an educational environment free from sexual violence and in training students, staff and faculty about sexual violence and how to reduce the risk of it occurring.

Having said that I think it is important for you to know a little about our sector's characteristics, which differentiate it from the public postsecondary educational sector. Those differences may have a bearing on how career colleges implement their sexual violence and harassment policies.

Our members are all privately owned postsecondary career colleges and offer vocational training in hundreds of essential skilled fields such as engineering technology, dental hygiene, massage therapy, aesthetics, paralegal and business administration. There are approximately 577 campuses in Ontario operated by 400 career colleges. CCO represents just under 50% of those campuses.

There is a large variance in the size of career colleges. Some career colleges are large but the majority of them are small with revenues under \$1million. As a consequence many career colleges have a small number of employees and in some cases owners, administrators and instructors are the same people. Their campuses are small and usually consist of some administrative offices and a limited number of classrooms. Classes are small with typically about 20 students in attendance. They do not have restaurants or bars on their campuses and students usually leave the premises after classes are completed. Career colleges also do not have student residences.

Career college students are typically older – 25 years and older, come from visible minorities and are more likely to be females who are married and have childcare responsibilities.

An increasing number of our students have already earned a postsecondary credential and have come to a career college to obtain vocational training so they

can find a job. They prefer to take the program in a compressed manner so they can get to work faster.

Why does this matter in the context of addressing sexual violence on our campuses?

Because of their small size career colleges do not enjoy the same institutional infrastructure and resources as do universities and public colleges. We do not have the same numbers of administrative or teaching staff and do not have faculty or student labour representation. Therefore, any sexual violence policy needs to recognize the practical realities of career colleges and provide easily effected and understood policies that a small business owner can apply. Importantly, a one - size fits all approach does not work for career colleges.

CCO has developed a template into which it has tried to distill the core requirements for a sexual violence policy. The template is intended to provide a baseline for all career colleges upon which they can expand while recognizing they do not have, generally, significant in house human resources or legal expertise.

We believe we have captured most if not all the proposed legislative requirements in our template and have adopted the specific language of the proposed amendments in a number of the provisions. We have also tried to incorporate most of the proposed regulations in the template, with the following exceptions:

- i. with reference to 5a-5e of the proposed regulations it is unclear how much detail is required in a policy with respect to reporting, investigating and implementing the decision making process;
- ii. with reference to 5g of the proposed regulations it is unclear how much detail should be contained in a policy with respect to the range of interim measures;
- iii. with reference to 5i of the proposed regulation it is unclear how much detail is required with respect to keeping information confidential; and
- iv. there is no reference to an appeal process in our template because in most cases an appeal process with respect to these issues may be beyond the resources of most career colleges.

With respect to items i through iii above, CCO recommends that the regulations require that the policies contain provision for these items but not require that they be in “detail” in the policy.

With respect to item iv above CCO recommends that consideration be given to the creation of an independent panel of experts in the area, managed by CCO, who could be called upon by a career college in the event that an appeal to a decision is required.

Thank you and I’m happy to take questions.