



Submission of the  
Ontario Teachers' Federation  
and its Affiliates

to the Governing Council of the  
Ontario College of Teachers  
re the Governance Review Report

February 2019



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# Introduction

The Ontario Teachers' Federation/La Fédération des enseignantes et des enseignants de l'Ontario is the advocate for the teaching profession in Ontario and for its 160,000 teachers.

OTF is a statutory body, established by the Government of Ontario in 1944 under the *Teaching Profession Act* (TPA) as the professional organization for teachers in Ontario to “promote and advance the cause of education, to promote and advance the interests of teachers, and to secure conditions that will make possible the best professional service.”

All teachers (as defined in the TPA) are required by law to belong to the Federation as a condition of teaching in the publicly funded schools of Ontario.

OTF members are full-time, part-time and occasional teachers in all the publicly funded schools in Ontario – elementary, secondary, public, Catholic and francophone.

The four teacher Affiliates, l'Association des enseignantes et des enseignants franco-ontariens, the Elementary Teachers' Federation of Ontario, the Ontario English Catholic Teachers' Association, and the Ontario Secondary School Teachers' Federation are all affiliated with OTF. Most of the Affiliates had formed voluntary teacher organizations 20 years before the TPA was passed in 1944. Teachers recognized the need for a Federation that would be acknowledged by provincial authorities as the professional association of all teachers in Ontario.





# Submission of the Ontario Teachers' Federation and its Affiliates to the Governing Council of the Ontario College of Teachers re the Governance Review Report

## Preamble

*The Ontario Teachers' Federation (OTF) and its Affiliates are pleased to present the following submission to the Governing Council (Council) of the Ontario College of Teachers (OCT or College), regarding the November 26, 2018 Governance Review Report (Report) prepared by Governance Solutions Inc. (GSI) concerning College governance.*

*We applaud the College's initiative in undertaking a review of its governance structure and practices, which is a healthy and worthwhile endeavour. So, what next?*

*At the very least, we would suggest that a more fulsome review of the College's governance structure and practices be measured against other self-governing professional bodies in Ontario. Unfortunately, such comparators are non-existent in the Report, aside from reference to pending changes (similar to those proposed in the Report) at the College of Nurses. Consequently, the Report fails to reflect the structure and regulatory experience of many other comparable professional bodies in Ontario, defaulting instead to simple concepts of corporate governance (as opposed to professional self-governance).*

*We would also suggest that any changes that may result from such further review may require an appropriate transition period, so as not to jeopardize the proper functioning of Council (many of whom were recently elected) and the regulatory effectiveness of the College.*

*Before we comment on specific recommendations from the Report, we will address concerns shared by OTF and the Affiliates regarding the timing, methodology and assumptions underlying the Report.*

## Timing

Following a meeting between the OTF President, the Secretary-Treasurer and the new Chair of Council late last year, during which this governance review was mentioned, OTF and the Affiliates were (belatedly) invited to respond to a brief six-question College governance survey just prior to the survey deadline. We have since learned that GSI actually met directly with other groups, including school administrators, to discuss the governance review and to solicit input.

Although the governance review had apparently been ongoing since the summer, it appeared to be an afterthought to seek input from OTF and the Affiliates, the very stakeholders who represent the teachers of Ontario in the publicly funded education system and the vast majority of the College's membership.

OTF's concerns regarding this '11th hour' invitation were subsequently shared with the Chair of the Governance Committee of Council but, in our view, they warrant sharing with Council as a whole. The release of the Report a short time following the survey deadline could reasonably lead one to speculate whether, and to what extent, the input provided by OTF and the Affiliates - those who represent the profession - was properly considered.



In the recent past, there have been ongoing governance reviews, over extended periods, of a couple of other self-governing professional bodies in Ontario (nurses and lawyers). These reviews have employed task forces and have issued multiple reports canvassing various options of governance. Those conducting the reviews have solicited extensive input from the profession involved. This is in stark contrast to the timeframe, process and methodology employed in preparing the Report, a report proposing fundamental change to the longstanding governance of the teaching profession.

## Methodology

When the Report was officially presented to Council at its special meeting of December 6, 2018, it was clear that there had been an extremely low response rate from those who were canvassed from the profession (255 out of 8,000) and from the public (89 out of 15,775). There was also a very troubling absence of input from Francophone stakeholders.

In fact, GSI admitted that the low response rate, although random, was not statistically significant. And, while they suggested that Francophone groups had been invited to comment on the governance survey, the survey had not been provided in French.

One might conclude that the Report's recommendations are based primarily on input from Council members and, in particular, College management, and are coloured by GSI's perspectives on corporate governance (as opposed to professional self-governance) and the consultant's attendance at only one Council meeting. Also, many recommendations in the Report appear to originate from singular or minority comments from the survey and interviews that were held.

# Assumptions

There are, in our view, certain misguided assumptions that appear to influence the Report and its recommendations, that ignore the history underlying the College and its existing governance structure and that of other self-governing professional bodies in Ontario, and that misconstrue the College's relationships with stakeholders and the public. These are discussed below.

## Self-regulation from a professional perspective

The recommendations in the Report suggest that self-regulation of Ontario's teachers is not working, and therefore the profession should not have a continued majority of members on Council or Council committees. There is no evidence to support this proposition.

The essence of professional self-regulation is that the members of a given profession are best-suited to understand, advise, guide and judge their profession. This has been the case for the teachers of Ontario since 1997, when the College was first established. As the Minister's Parliamentary Assistant stated, when the OCT Act (Bill 31) went before the Standing Committee that reviewed the Bill:

*"By giving teachers the power to regulate their own profession, we are putting the responsibility for excellent teaching in the hands of those who are best qualified to know what a teacher should and must be, today and in the future.... After all, it will be teachers who, like other Ontario professionals, will set the standards by which they are trained and by which they practice their profession throughout their careers....In developing this legislation, we have learned from the same basic public policy that characterizes more than 30 other self-regulating professional bodies in Ontario.... The college will have a governing council of 31 members, more than half of whom must be qualified teachers. The public will also be represented on the council, ensuring the college serves the interests of the broader community, as well as the professional interests of teachers." Toni Skarica, April 15, 1996*

In fact, the majority of profession members on Council (initially 17) was subsequently increased to 23, based on commissioned research. Arguably, self-regulation, at least in part, actually pre-dated the College for many decades, since OTF was previously responsible for discipline, while the Ministry of Education managed licensing and standards.

The balanced governance model proposed in the Report may be necessary or appropriate in the corporate context, where competing interests may demand an equal voice at the table. However, this is quite different than the self-governance of a profession where interests are aligned (in this case, Council members - both elected and appointed - have a duty to act in the public interest) and where the requirements for participation in the profession are clearly specified in legislation, standards and best practices.

A review of other self-regulating professional bodies in Ontario similar to the OCT (lawyers, accountants, engineers, dentists and doctors) reveals a consistent majority of profession members on such bodies. For example, the governing body of The Law Society is comprised of 48 Benchers, 40 of whom (83%) come from the legal profession itself. Accountants comprise 79% of their provincial council (15 of 19), and engineers comprise 68% (17 of 25), while dentists and doctors comprise anywhere from 56% to 61% of their respective councils (which vary in size from 23-25 members for dentists and 32-34 members for doctors). These figures quite clearly

refute the statement in the Report that “The clear trend among other senior self-regulated professions is towards smaller governing boards/councils, balanced in make-up.”

It should also be noted that these very same self-regulating professional bodies also elect their profession members to their governing councils, refuting yet another statement in the Report that “Other senior self-regulated professions are moving in the direction of competencies-based appointments in place of elections to choose their governors.”



Despite some areas for improvement, the College has been effectively regulating the teaching profession (licensing, standards and discipline) for the past 22 years, during which members of the profession have been democratically elected to Council by their peers in eight elections. In fact, the Report itself recognizes that regulatory governance by the College is strong and highly effective. (Report p.7)

## Politicization of the Council election process

There are suggestions in the Report that the Council election process is overly politicized, and that this is detrimental to the composition of Council. Elections by their very nature are, to some extent, ‘political’ contests between competing candidates.

However, there is no evidence to support the suggestion that Council elections are somehow ‘stacked’ in favour of candidates chosen by the teacher federations. Although some federations may have endorsed specific candidates in past Council elections, this was simply a way of supporting those whose professional experience was viewed as worthy of consideration for service at the regulatory level.

Most teachers who vote in Council elections would not know the candidates either personally or professionally, so the endorsement of a specific candidate by the teacher’s own federation simply provides one form of validation for those who are being asked to select from among their peers. The ultimate decision is left to the voter.

## Confusion as to what the College does

There are suggestions in the Report that the public is confused by what the College does and therefore, OCT ought to be renamed “The Ontario Teachers Regulatory Authority.”

The legislation governing the OCT lays out the specific objects within the College’s mandate. The primary role of the College, in regulating the profession, is to license teachers, to provide professional standards to be met, and to discipline those who fail to meet those standards.





If there were concerns when the OCT was established that use of the word “College” might be confusing, since teachers had historically attended ‘teachers’ college’ to become properly qualified for licensure, it is reasonable to assume that 22 years of regulation by the OCT has long since resolved any such confusion. It is worth noting that other self-governing professional bodies in Ontario (such as doctors, dentists and nurses) also use the term “College”.

And, in recent years, the College has taken steps to increase public awareness of its regulatory role, through the use of social media and attendance of various public events, for example.

## Comments on specific recommendations from the Report

### Recommendations on the structure and composition of Council and its committees

- 1. Council will comprise 14 members (currently 37), 7 from the profession (currently 23) and 7 from outside (currently 14).**

#### Comments

There may be some merit in reducing (slightly) the overall size of Council,\* especially to make Council meetings and deliberations more efficient, productive and timely.

However, we fundamentally reject any proposal to eliminate the current majority of profession members who serve on Council (see previous comments regarding self-regulation).

We also have concerns that any reduction in the size of Council not jeopardize the diversity of regional and system representation currently reflected on Council.

\* It is worth noting, however, that the number of OCT members (236,635) regulated by the current Council (37 members) already equates to a ratio of 6,396:1 as compared to only 4,685:1 for accountants; 3,238:1 for engineers; 1,263:1 for lawyers; 956:1 for doctors and 398:1 for dentists. Therefore, any reduction in the size of Council would simply inflate the current ratio even higher. [Membership figures, except for lawyers, are taken from OCT’s 2019 Proposed Budget.]

- 2. Council members will be selected by a Governance & Nominating Committee (GNC), (a majority of whom will be from outside the profession) from a pool of qualified applicants based on competencies and attributes, and following a robust, transparent process.**

#### Comments

We agree that there may be some merit in strengthening the eligibility criteria for candidates who wish to serve on Council. For example, those with more teaching experience and/or other experience within or outside the profession (including experience within the teacher federations) could offer a more diverse range of perspectives that would serve Council well in carrying out its regulatory mandate.

It may be that a GNC might be well-suited to selecting members of the public for service on Council, especially since the need for certain skillsets and attributes will likely vary over time.

However, we firmly believe that the democratic election process that has been in place since the College was established is, in fact, “a robust, transparent process” and that profession members of Council should continue to be elected by the profession. As noted earlier, other self-governing professional bodies in Ontario also elect their profession council members.

We do not believe that a Governance and Nominating Committee, especially one that has a majority of members from outside the teaching profession, is somehow better-suited to choosing those who should regulate the profession than a democratically-elected process. And we reject the suggestion that the GNC would require a majority of outside members in order to “avoid either the reality or the perception that a small group of members of the profession, potentially highly politicized, controls the selection process, which is the current situation that must change if self-regulation is to be preserved at the College.” Given that profession members of Council have always been elected from across Ontario, there is absolutely no basis to support such a statement. In addition, there is certainly no suggestion in the recent Bill 48 that the distinction between elected and appointed members of Council should disappear.

**3. Members of statutory and regulatory committees will also be selected by the GNC from pools of qualified applicants (excluding Council members) based on competencies and attributes, and following a robust, transparent process.**

**Note: In the case of both Council and committee members, public members will be appointed by the Province (informed, but not limited by the recommendations of the GNC), whereas profession members will be appointed by Council on the GNC’s recommendations.**

**Comments**

We agree that there may also be some merit in strengthening the eligibility criteria for candidates who wish to serve on Council committees. Again, as mentioned above, those with more teaching experience and/or other experience within or outside the profession (including experience within the teacher federations) could offer a more diverse range of perspectives that would serve Council well in carrying out its regulatory mandate.

We acknowledge the Report’s suggestions that committee members should not be chosen from among Council members, other than for Audit & Finance, GNC and HR, in order to mitigate time commitments and to enhance the focus of efforts on the specialized work of committees. However, this would require further exploration and thoughtful consideration.

It may be that a GNC might be well-suited to selecting members of the public for service on Council committees, especially since the need for certain skillsets and attributes will likely vary over time and from committee to committee.

However, as stated above, we firmly believe that the democratic election process that has been in place since the College was established is, in fact, “a robust, transparent process” and that profession members of Council committees should also continue to be elected by the profession. As previously noted, the election of profession members to other self-governing professional bodies in Ontario is the norm.

**4. Regions, linguistic, faith and other groups will be consulted in the selection process.**

**Comments**

As noted above, we firmly believe that the democratic election process that has been in place since the College was established is, in fact, “a robust, transparent process” and that profession members of Council and Council committees should continue to be elected by their professional peers.

We would expect that the election process would continue to provide a similar diversity of regional and system representation to that currently reflected on Council, even if the number of Council members were to be slightly reduced.



**5. The mix of profession and public members on committees will be driven by best outcomes - for example: Investigation, Discipline and Fitness to Practise Committees (and panels) will have equal members of both, whereas Accreditation (incl. Appeals), Registration Appeals and Standards of Practice and Education will have a majority (of one) of members from the profession, while Audit & Finance, GNC and Human Resources will have a majority of public members.**

**Comments**

While we agree that any Council committee be driven by best outcomes, we reject the notion that the achievement of best outcomes inherently depends upon the mix of profession versus public members. All Council and committee members are obliged to carry out their duties in the public interest and within the legislated mandate of the College.

We firmly believe that Council committees, like Council itself, should continue to reflect a majority of members from the profession, as has been the case for many years.

- 6. Council and committee members will serve two-year staggered terms, renewable up to four times (i.e. eight years max. service).**

#### Comments

We understand the rationale behind staggered, renewable terms for Council and committee members. However, we don't believe that shortening up the terms (from three years to two years) would solve any apparent problem. History has shown that each Council includes a balance of new members as well as returning members, which has served the College well.

- 7. Chairs of Council and committees will be selected from, and by their members, informed by a GNC review, with one-year renewable terms (max. four years service).**

#### Comments

We would observe that Chairs of Council and committees have, for many years, been selected from, and by their members, and that this process seems to work well.

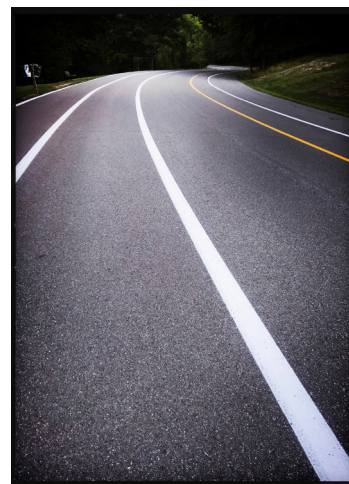
However, we don't believe that one-year (albeit renewable) terms are sufficient enough to support the effectiveness and continuity of leadership. We are also concerned that shorter terms would simply invite unhealthy and constant competition for such leadership roles, thereby affecting the productivity and efficiency of Council and committee work.

## Recommendations concerning the strategic, performance and risk direction of the OCT

- 8. Council will approve Strategic Priorities that explicitly align with and improve protecting students.**

#### Comments

While we agree that Council needs to set clear strategic priorities that are aligned and consistent with the OCT's legislated mandate, we would observe that such mandate does not actually refer to the protection of students. The role of the College is to govern the profession and regulate its members which, in turn, protects students.



- 9. The College will directly measure harm reduction among Ontario's students and/or adopt an explicit logic chain model to link strategic priority activities to this desired outcome, and report publicly on these outcomes.**

#### Comments

As stated above, the legislated mandate of the OCT does not actually refer to the protection of students. That said, risk reduction is a product of a well-governed profession. To the extent that the College carries out its regulatory role (licensing, standards and discipline) in a robust and transparent, but judicious manner, it is effectively protecting students and acting in the public interest.

- 10. The College will continue and hone its initiatives to engage the public and members through web-site, newsletter, focus group, poll and other means, measure and report on the improvement in understanding of the College's purpose.**

### Comments

The College has taken steps in recent years to promote a better understanding of its role, through increased engagement with its members and with the public. Provided the College adheres to its mandate, we support reasonable and cost-effective efforts towards further such engagement including monitoring and measuring, transparency and accountability.

When it comes to the disclosure of disciplinary matters, however, we firmly believe that the College must also be vigilant in protecting the privacy interests of those who become the subject of such proceedings, especially until the matter has been properly concluded.

## Recommendations concerning the culture and functioning of the OCT

- 11. Council's governance culture will be more healthy, respectful and professional.**

### Comments

We agree that the culture within the College should be healthy, respectful and professional. Both College staff and all Council members have much to offer towards governing and regulating the teaching profession in Ontario. Their respective roles in this regard, as well as the professionalism of Ontario's teachers, should be respected and held in high regard.



- 12. The College will be renamed "The Ontario Teachers Regulatory Authority."**

### Comments

As alluded to earlier in this submission, we do not see any need to rename the College. There is no evidence to suggest that the name "Ontario College of Teachers" causes widespread confusion, or that it implies the protection of teachers to the detriment of students or the public interest, especially after 22 years of regulating the profession.

As noted earlier, there are many other professionals in Ontario, including doctors, dentists and nurses who are also regulated by a self-governing body that uses the term "College" in its title. And those that don't use the term "College" certainly don't use the term "Regulatory Authority" either, the latter of which is more appropriate for a regulated sector of the economy, such as financial services, rather than for a professional body.

- 13. The College will adopt a structured, mandatory governance education program for Council, senior staff and Committee members, as well as a separate program for all Chairs.**

**Comments**

We agree that staff and Council need to understand their respective roles (operational and governance) in carrying out the OCT's mandate and regulating the teaching profession. An educational program that reflects these distinct roles and responsibilities and that respects the mandate and the regulatory role of the College, could certainly benefit those involved.

- 14. Formal annual evaluations of the effectiveness of Council, Committees and Chairs will be conducted based on pre-agreed criteria.**

**Comments**

We agree that Council and its committees, including Chairs, should engage in periodic evaluations to ensure that they carry out their roles and responsibilities in a productive and effective manner. However, we believe that a similar process of evaluation for College staff for similar reasons would also be appropriate, to the extent that this is not currently done.

- 15. Formal annual evaluations of the effectiveness of the Registrar will continue to be conducted, driven more explicitly by strategic priorities aligned to achieving the mandate.**

**Comments**

We agree.

- 16. The Executive Committee will be a Committee of the Whole with a changed mandate; public, closed and executive sessions will be redelineated.**

**Comments**

Given our earlier objections to fundamental changes to the composition and size of Council, we do not believe that the Executive Committee could effectively operate as a Committee of the Whole. And, while we understand why some matters such as human resource issues may be better dealt with in private by the Executive Committee or in camera by Council, we would strongly suggest that attempts to address even more Council matters in private would not seem to be in the public interest.

We recognize that there are certain opportunities such as retreats, briefings and committee work for Council members to express themselves in more frank and open discussions, but these should be the exception and not seemingly the rule.

We are offended by comments in the Report that a "culture of fear" is the inevitable result of expecting Council members to share their views and constructively engage with one another and with staff in public meetings attended by parties "with special advocacy interests." We would expect Council members, whether elected or appointed, to fulfil their important role by openly engaging in discussion of professional regulatory matters, while recognizing that members of that same profession should take an active interest in same.

**17. The Council Chair will not be full-time, and will focus on ensuring an effective Council.**

**Comments**

While we agree that the Council Chair has an important role to play in ensuring an effective and productive Council, we do not believe that the Chair's overall duties and responsibilities can be accomplished properly on a less than full-time basis.

As a part-time role, the Chair would have limited insights into College governance and activities, making it more difficult to fulfil the proposed role of "being an effective manager of Council, resource to Council members, liaison with the Registrar, and coordinator of issues among committees," not to mention chairing meetings and acting as the spokesperson for Council.

Given the increasing volume of activity at the College in recent years, we fail to see how a person could properly fulfil the role of Council Chair, with its attendant responsibilities, on a part-time basis, especially if it would require constant travel from elsewhere in Ontario and/or interrupt other professional activities.

**18. The Steering Committee will be disbanded, and Presiding Officer no longer used, with their responsibilities assumed by the Chair of Council.**

**Comments**

Given our earlier objections to fundamental changes to the composition and size of Council, we do not believe that the Chair could or should simply assume the duties of the Steering Committee and the Presiding Officer, even if the Chair remains, as it should, a full-time role.

**19. Strict parliamentary procedure at Council meetings will give way to a less formal process to promote dialogue, constructive challenge and dissent.**

**Comments**

We do not believe that simply dispensing with some form of parliamentary procedure at meetings will somehow lead to more constructive dialogue. In fact, we could expect the opposite to happen, where a few voices dominate the discussion and dissent is dissuaded.

We do believe that better training could assist Council members to understand the basics of parliamentary procedure, and how it adds value to a meeting by allowing all voices to be heard and respecting due process.



## Recommendations concerning enhancements to the effectiveness of specific Council committees

### 20. The Discipline process will be streamlined.

#### Comments

We agree with efforts to minimize delays in the discipline process through better resourcing and efficiency, but certainly not at the expense of just and fair hearings. We are also quite alarmed by the reference in the recommendation to providing complainants with “access to coaching.”



### 21. Rosters will be maintained to provide a pool of qualified panelists to supplement Committee members, selected from pools of qualified applicants following a robust, transparent process.

#### Comments

We understand that this generally reflects the current process for selecting and maintaining a roster of additional panelists, with which we agree.

### 22. Roster members will have voice and vote equal to Committee members on panels.

#### Comments

We agree.

### 23. The College will continue and hone its orientation programs for new Statutory and Regulatory Committees in regulatory governance.

#### Comments

We agree.

### 24. Audit & Finance, Governance & Nominating, and Human Resources Committee (corporate governance) members will be selected from Council members.

#### Comments

We agree and we believe that the Chair of Council should be full-time and should serve on each of these committees, in order to fulfil the proposed role of “being an effective manager of Council, resource to Council members, liaison with the Registrar, and coordinator of issues among committees.”



- 25. The Finance Committee will be renamed Audit & Finance Committee and its charter revised accordingly.**

#### Comments

We agree. However, we firmly believe that Council has a significant oversight function when it comes to the finances of the College (revenues and expenses), especially given that the OCT is financed almost entirely by the profession.



- 26. The Governance Committee will be renamed Governance & Nominating Committee and its charter revised accordingly.**

#### Comments

We agree that this committee should retain its existing responsibilities, including advice to Council on strategy, while advice to Council on risk would best come from Audit & Finance.

It may be that a Governance & Nominating Committee might be well-suited to selecting members of the public for service on Council and committees, especially since the need for certain skillsets and attributes will likely vary over time and from committee to committee.

However, we do not believe that a Governance & Nominating Committee, especially one that has, as proposed, a majority of members from outside the teaching profession, is somehow better-suited to choosing those who should regulate the profession than a democratically-elected process.

We reiterate comments from earlier in this submission that the democratic election process that has been in place since the College was established is, in fact, “a robust, transparent process” and that profession members of Council should continue to be elected by the profession.

- 27. The Human Resources Committee’s charter will be tweaked to clarify its roles.**

#### Comments

We generally agree that the Human Resources Committee should provide high-level, as opposed to operational, oversight. That said, we believe that this committee, together with Council, does have a significant oversight role when it comes to senior management of the College, including the Deputy Registrar, as well as the finances of the College, the largest expense of which is compensation.

- 28. The Quality Assurance Committee will be a working group of the College, not Council, with a Scorecard to Council.**

**Comments**

We agree, provided there is a reporting mechanism in place to ensure that Council receives regular updates from the Registrar that identify College activities against strategic priorities.

- 29. The Editorial Board will be a working group of the College, not Council.**

**Comments**

While we understand why much of the editorial work might be performed by College staff, we believe that Council should have some oversight as Council is ultimately responsible for the public and professional persona of the OCT, which includes *Professionally Speaking/Pour parler profession*.

## Recommendations concerning other opportunities for the College to improve its governance effectiveness

- 30. The Vice-Chair office will be disbanded.**

**Comments**

We disagree. We believe that the Vice-Chair plays an important role in assisting and, where necessary, filling in for the Chair, to provide continuous and effective leadership to Council.



- 31. The College will track, monitor and report on the effectiveness of the complaint resolution processes.**

**Comments**

We agree.

- 32. The College's Bylaws will be revised to be more enabling than prescriptive, to focus on substance more than process.**

**Comments**

We agree.

**33. All Board-level Policies of the College will be systematically monitored and reviewed.**

**Comments**

We agree.

**34. Council and each Committee will adopt and use an annual work plan.**

**Comments**

We agree.

**35. The College will adopt, monitor and report on a Diversity Strategy for the Council and staff.**

**Comments**

As noted earlier, a Governance & Nominating Committee might be well-suited to selecting members of the public for service on Council and committees, and identification of qualified candidates with certain skillsets and attributes should include elements of diversity.

However, we reiterate our earlier comments that the democratic election process that has been in place since the College was established is not only “a robust, transparent process” but is also the best way of ensuring that profession members of Council reflect the diversity of the teaching profession across Ontario.

**36. The College will tidy up its membership records.**

**Comments**

We agree that efforts could be made to ensure that membership records properly reflect the status of OCT members.

**37. Public members of Council, Committees and roster panelists will be remunerated in a fair exchange for their expertise and time.**

**Comments**

We agree with the principle of equivalent pay for equivalent value.

## Notes

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