

February 2, 2026

Honourable Paul Calandra
Minister of Education
315 Front St West, 14th Fl,
Toronto, ON M7A 0B8

Dear Minister Calandra,

Autism Ontario continues its mission of creating a supportive and inclusive Ontario for autism. We advocate for a province that recognizes the need for seamless supports across the life course, reflecting the diverse nature of Ontarians with autism, their unique lived experiences, and the needs of their caregivers and families who love and support them as they grow from infancy to adulthood.

We are grateful for the opportunity to provide input and recommendations regarding the Ministry of Education's [Proposal for regulations under the *Education Act*, related to school boards and local police services](#).

Sincerely,



Marg Spoelstra
Chief Executive Officer
Autism Ontario

Thank you for the opportunity to provide input and recommendations regarding the Ministry of Education's [Proposal for regulations under the *Education Act*, related to school boards and local police services](#).

Proposal for regulations under the *Education Act*, related to school boards and local police services.

We understand that requiring school boards to provide local police services with access to school premises and participation in school programs and events is intended to promote positive relationships between students and police officers and improve school safety. However, the draft regulation also leads us to express particular caution for autistic students and their families. As Ontario's trusted voice for autistic children and adults in Ontario, we ask that the Ministry of Education consider our comments and recommendations below, as well as our feedback provided directly on the draft regulation (Appendix A).

Impacts on the well-being of students with disabilities

It is difficult to understand what is meant by some of the itemized programs listed in section 1 (1) and therefore the list appears to be a "catch-all", resulting in police presence being mandated at every event and program. For example, most school initiatives would be perceived to capture "student well-being" because of the nature of education. If "student well-being" is also intended to capture "student mental health", we would caution against this. Mental health is not in the community of practice for police, and the mental health of autistic students (and educators) is a complex area of professional practice which can be negatively impacted by the presence of police.

Recommendation:

- Provide details regarding "learning and mentorship program", "youth engagement program" and "student well-being" and ensure the goals of such programs are not undermined by the requirement to include local police services.

Transparency and community co-creation

We applaud the efforts in the draft regulation to ensure students, parents, and guardians are included in informing the implementation of the program. Policies are stronger when they are grounded in community engagement. The extent of such engagement, and what the program looks like, could be clearer. Otherwise, the good intention behind the requirement might be watered down by lax or careless consultations. Meaningful consultations can be most impactful when the outcomes of the engagement are shared back with the parties involved. Clarity around what is expected for the "program" will ensure consistency across the province.

Recommendation:

- Clarify what is meant by "program" to promote consistency. Clarify what is required by school boards with respect to engaging students and communities on the implementation

of the program. Detail how and when this will happen. Ensure opportunities for advice to be received by (as opposed to simply informing) students, parents and guardians, and include Parent Involvement Committees and Special Education Advisory Committees. Require school boards to share with the consulting parties how or if their feedback was incorporated, and why. Require school boards to post the mandated Memorandum of Understanding on the school board website.

Impacts on student discipline and filling support personnel gaps

There is valid concern that the presence of school resource officers will result in increasing rates of discipline, particularly if principals and teachers turn to the police officer to assist with incidents that they might not have if the officer was not readily available.¹ This is particularly concerning for students who already experience disproportionately high rates of discipline, such as Black and Indigenous students and students with disabilities. For some autistic students who require a higher level of human resource support to be safe and have a sense of belonging, we are concerned that police officers will be inappropriately engaged to fill any personnel gaps.

Recommendation:

- Safeguards must be placed to ensure lack of available support staff is not remedied by involving police in discipline matters and other incidents which would normally and successfully be handled by school staff. Data collection (with careful regard to Indigenous data sovereignty) and on-going monitoring by individuals with expertise be mandated as part of all SRO programs to ensure the presence of police services does not further increase the rates of discipline and does not serve to attempt to fill funding and resource gaps for the support of autistic students.

Impacts on involvement with justice system

On November 4, 2022, Abdullah Darwich, a non-verbal autistic 19-year-old, was handcuffed and tasered by Peel Regional Police (PRP) when he was not responsive to their questions and commands. Abdullah was playing outside in leaves near his house in Mississauga. His father had previously registered him with PRP's vulnerable person registry, but it was not checked by PRP officers and training on engaging with autistic individuals was absent. Abdullah experienced lasting trauma from the incident.²

When autistic individuals are involved with law enforcement, there is a higher likelihood of a negative outcome. A study out of Centre for Addiction and Mental Health (CAMH) found that over an 18-month period, 16% of people with autism had an interaction with police and that in almost one-third of the cases the police response had a negative effect on the autistic person. In 19% of police interactions, physical restraints were used.³

¹ <https://www.cbc.ca/news/canada/toronto/police-officers-in-schools-1.7572082>

² <https://www.cbc.ca/news/canada/toronto/father-speaking-out-after-non-verbal-autistic-son-tasered-handcuffed-by-police-1.6644437>

³ <https://www.camh.ca/en/camh-news-and-stories/what-happens-when-people-with-autism-interact-with-police>

A study out of Florida showed that students with disabilities are arrested at much higher rates than their peers, especially when police are regularly on campus.⁴ We are concerned that police presence in schools will increase the already disproportionate rates of encounters between police and disabled individuals. Steps must be taken to ensure the SRO program does not increase the risk of traumatic incidents for autistic students.

Recommendation:

- Require schools to focus on hiring trained support staff and creating a culture that truly understands, supports and affirms students' disability-related needs. Require schools and police services to engage in third party training to promote anti-ableist, trauma informed and disability-affirming practices.

Caution regarding uniforms and “plain clothes officers”

Police in school programs who are not in uniform (s. 1(4)) may present additional challenges to autistic students and students with intellectual disabilities and contribute to generalized vulnerability in their communities within systems that historically teach and emphasize compliance from those in positions of power.

Adding layers of masked surveillance (i.e. a “plain clothes officer” in a school) can create mistrust, anxiety, and confusion about visual signifiers of police authority. This confusion extends to the formation of trusting relationships with others and may erode personal autonomy within those social domains. In an extreme but realistic example, this could lead an autistic student to comply with abusive demands by a person because they perceive anyone (and everyone) to be in a position of authority.

It is important for students to develop critical thinking and self-advocacy skills wherever possible. That may include relying on visual cues to seek out help from emergency personnel, including police officers, who generally wear a recognizable uniform. Emphasizing existing external events (held outside of schools) can help build those relationships, too.

Recommendation:

- Require police to be uniformed when in schools to reinforce the visual cues that autistic and disabled students can use when they need help in their community.

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https://disabilityrightsflorida.org/blog/entry/how_police_in_school_impacts_students_with_disabilities#:~:text=Students%20today%20face%20new%20challenges,understands%20and%20supports%20students'%20needs

Black and racialized students and Indigenous students

Finally, we echo the concerns raised by the Ontario Human Rights Commission in its June 2025 submissions on school resource officers⁵ and we refer to the findings in its Dreams Delayed report: “Police presence and surveillance inside schools has a disproportionate impact on Indigenous, Black and other racialized students.”⁶ We know that the risk of harm increases for students with intersectional identities, including Black autistic students and Indigenous autistic students.

Recommendation:

- We strongly recommend broad consultations with Black and Indigenous communities and co-creation of regulations prepared with advocacy organizations focused on the well-being of Black and Indigenous youth. This will help ensure efforts to promote school safety are not at the expense of these young people.

Conclusion:

Bill 33 requires boards to implement School Resource Officer programs where offered, despite longstanding concerns about trust, training, accountability, and disproportionate impacts on racialized and disabled students. To promote school safety, approaches must be grounded in student well-being and evidence-based, non-criminalizing practices, with clear standards for training, scope, and accountability, and informed by local context and community input. Students with disabilities are already over-represented in the justice system. Increased police presence risks escalating situations rooted in unmet needs or mental health distress, repeating past harms rather than supporting safe, inclusive schools.

If the requirement for school boards to work with local police services as outlined in the draft regulation proceeds, we ask that Autism Ontario’s recommendations be meaningfully considered to mitigate the risks outlined above.

Thank you again for the opportunity to provide our comments. We would be pleased to participate in any co-creation opportunities to ensure the voices of autistic children and adults in Ontario are centered in program and policy discussions.

APPENDIX A

Caution:

This consultation draft is intended to facilitate dialogue concerning its contents. Should the decision be made to proceed with the proposal, the comments received during consultation will be considered during the final preparation of the regulation. The content, structure, form and wording of the consultation draft are subject to change as a result of the consultation process and as a result of review, editing and correction by the Office of Legislative Counsel.

CONSULTATION DRAFT

ONTARIO REGULATION

to be made under the

EDUCATION ACT

WORK WITH LOCAL POLICE SERVICES

Access to school premises and participation in school programs

1. (1) A circumstance in which any of the following activities, events or programs are taking place on school premises is prescribed for the purposes of clause 170.0.2 (1) (a) and (b) of the Act:

1. A community and student safety program.
2. A program that provides training and drills in respect of lockdown procedures and other emergency preparedness.
3. A school resource officer program.
4. A road and driving safety program.
5. A learning and mentorship program.
6. A youth engagement program.
7. A student well-being program.
8. A program to build relationships between local police services and students.
9. A career day, extra-curricular event, festival, fundraiser or any other activity or event involving parents, guardians or other members of the community being provided with access to the school premises.

Despite subsection (1), a board is not required to permit the local police services to participate in an activity, event or program if it is not being delivered by the board.

If a board is delivering an activity, event or program mentioned in subsection (1) at a location off school premises, the board shall permit the local police services to participate and provide access to the location.

(4) For greater certainty, clauses 170.0.2 (1) (a) and (b) of the Act apply whether or not a member of the local police services is in uniform.

School resource officer programs

2. (1) The following circumstance is prescribed for the purposes of clause 170.0.2 (1) (c) of the Act:

1. The local police services offers a school resource officer program.

(2) If the circumstance set out in subsection (1) exists, the board shall satisfy the following requirements:

1. Enter into a memorandum of understanding described in subsection (3) with the local police services to implement the school resource officer program.

2. Ensure that students, parents and guardians are made aware of the program and the details of its scope, including (for transparency) by sharing the memorandum of understanding on its board website.

3. Engage students, parents, educators and community members to inform the implementation of the program.

(3) The memorandum of understanding must set out the details of how the board will work collaboratively with the local police services to,

ensure that the local police services build and maintain positive relationships with students and school communities;

ensure that the local police services engage in third party training to ensure disability-affirming, trauma informed practices will guide their interactions with students, educators and families

(b) share general information about the school population and local community with school resource officers;

(c) ensure that the students, parents and guardians are made aware of the school resource officer program and any related presentations or workshops in accordance with subsection (2); and

(d) involve students, parents and guardians in the implementation of the school resource officer program.

Manner of working with police

3. (1) For the purposes of subsection 170.0.2 (1) of the Act, every board shall work with its local police services in a manner that,

promotes student, school and public safety;

acknowledges that for some students, including Black, racialized or Indigenous students, and disabled or neurodivergent students, the presence of police does not make them feel safe;

(b) builds and maintains positive relationships between the local police services and the students and school communities; and

(c) is consistent with the guideline entitled, “Provincial Model for a Local Police/School Board Protocol” established under subsection 301 (7) of the Act and available on a website of the Government of Ontario.

(2) A board shall not make a local police service’s participation in a school activity, event or program conditional on the board’s approval of any material.

(3) If a board has made good faith efforts to work with its local police services in respect of one or more of the board’s duties under subsection 170.0.2 (1) of the Act and the local police services has not reasonably participated, the board is deemed to have performed that duty for the purposes of subsection 170.0.2 (2) of the Act.

Commencement

4. [Commencement]