



Association of Administrators of English Schools of Quebec

Association des administrateurs des écoles anglaises du Québec

Montréal, April 4, 2025

Mme Ann-Philippe Cormier
Édifice Pamphile-Le May
1035, rue des Parlementaires
3e étage
Québec (Québec) G1A 1A3

Subject: Response to Bill 94 An Act to, in Particular, Reinforce Laicity in the Education Network and to Amend Various Legislative Provisions

Dear Ms. Cormier,

On behalf of the Association of Administrators of English Schools of Quebec (AAESQ), which represents over 500 administrators from English schools, centers, and board-level positions across ten English school boards in Quebec, I am writing to share our perspectives and concerns regarding Bill 94. We appreciate the opportunity to participate in the consultation process and present this brief.

The AAESQ advocates for initiatives that promote student safety and well-being, particularly in light of recent events in the news. It also emphasizes the importance of upholding democratic values, including gender equality, within institutions. While we acknowledge and respect the values outlined in Bill 94, we foresee significant challenges in its practical application. Furthermore, members of the English-speaking community believe that certain provisions of the bill conflict with our country's multicultural identity, which values religious diversity. While we will defer to the Quebec English School Boards Association (QESBA) regarding the political aspects of the bill, particularly those related to laicity and minority rights, our response will focus on the administrative amendments to the Education Act that directly affect school and board administrators.

The AAESQ's brief specifically addresses the following provisions of Bill 94:

- **Paragraph 12:** Code of Ethics and Governing Board involvement
- **Paragraph 15:** Instructional Planning and Yearly Evaluation of Teachers by the Principal
- **Paragraph 24:** Educational Services Quality Committee
- **Paragraph 32:** Prohibition of Religious Symbols
- **Paragraph 37:** Guide on Good Practices

Paragraph 12 – Code of Ethics and Governing Board Involvement

While the AAESQ recognizes the importance of a code of ethics for all levels of governance, developing and implementing such a code requires substantial resources, training, and oversight. Many administrators are already managing numerous responsibilities, and this additional burden could be overwhelming.

We recommend the establishment of centralized guidelines and support to ensure consistency and reduce the administrative burden. A standardized template and a dedicated task force could provide necessary oversight while allowing flexibility to accommodate the unique needs of different communities. Engaging diverse stakeholders in this process will enhance the effectiveness and acceptance of the code. However, we acknowledge that this is a considerable undertaking requiring adequate support.

Paragraph 15 – Instructional Planning and Teacher Evaluations

While we agree in principle with the importance of instructional planning and teacher evaluations, the additional workload imposed on principals without financial or administrative support makes effective implementation impractical. Reviewing each instructional plan and ensuring follow-up throughout the year is a demanding task that cannot be properly managed under current conditions.

We propose the development of a streamlined process supported by additional resources to mitigate this workload to both teachers and administrative leaders. An easy-to-use digital platform for lesson plan submissions may assist with efficiency, but without additional personnel or funding, the increased workload remains a significant concern.

Conducting annual evaluations for all teachers would be an extensive process that could divert attention from other essential administrative duties. Furthermore, without clear guidelines and proper training, there is a risk of subjective biases affecting the evaluation process. According to the Education Act (art. 96.21), administrators are responsible for managing their staff, and the frequency of evaluations should remain at the principal's discretion. Imposing a mandatory evaluation schedule interferes with managerial rights. Given the ongoing negotiations concerning working conditions, this requirement should be carefully reconsidered.

Additionally, and most importantly, to ensure this measure is both effective and feasible, additional resources and administrative support must be allocated to school administrators.

Paragraph 24 – Educational Services Quality Committee (ESQC)

The proposed establishment of an Educational Services Quality Committee raises several concerns. The lack of clarity regarding the committee's role, the level of communication required with school principals, and the degree of administrative involvement creates uncertainty. This initiative introduces additional layers of oversight, which could complicate existing administrative processes and add to the already heavy workload of school administrators.

It is also unclear how the committee will monitor instructional standards and whether schools will be required to regularly report to this committee. Without well-defined roles and responsibilities, there is a risk of bureaucratic inefficiencies. We request further clarification on these matters and stress the importance of minimizing additional administrative burdens.

Paragraph 32 – Prohibition of Religious Symbols

While we maintain our disagreement with Bill 94 regarding the prohibition of individuals wearing religious symbols, seen as a violation of the right to express one's beliefs and identity, we must highlight the administrative challenges this presents. The ongoing concern regarding a shortage of personnel significantly impacts our ability to hire qualified individuals, as well as service providers and volunteers, who may wear religious symbols. This limitation compromises our capacity to deliver essential services to our students.

For instance, with the anticipated increase in federal funding for the universal food program, we will need to expand our workforce to effectively manage the purchasing, preparation, and distribution of meals to students. Unfortunately, the restrictions imposed by this bill will severely limit the pool of potential individuals who can enter our schools to support this initiative. As a result, we risk underutilizing the available funds, hindering our ability to implement the program successfully and provide the necessary services to our students.

This issue is not isolated; many other programs and activities requiring human resources will also be adversely affected. Furthermore, the burden placed upon our administrators to manage school operations and budgets effectively will be exacerbated by these restrictions. It is crucial that we reassess the implications of these prohibitions to avoid jeopardizing the vital services we provide to our students and to ensure that administrators have the necessary flexibility to manage their schools efficiently.

Paragraph 37 – Guide on Good Practices

We are unable to provide a detailed response regarding the guide on good practices due to a lack of information. Key details, such as the level of prescriptiveness, administrative and professional autonomy, implementation timelines, and available support, remain unknown. The lack of these critical details hinders our ability to engage in an informed and thoughtful consultative process. We request further clarification on these aspects.

General Concerns

Administrators are already facing significant challenges related to workload and resource limitations. The additional requirements introduced by Bill 94 may lead to burnout and reduced effectiveness, making it increasingly difficult to attract and retain qualified personnel in administrative roles. While greater accountability is being placed on school principals, no corresponding resources are being allocated to alleviate the growing responsibilities.

Critical Oversight

A serious issue we would like to address is the omission of "School Boards" in the English version of the bill, which instead refers only to "School Service Centres." This is not a minor wording discrepancy; it undermines the governance structure of English schools and disregards the minority language rights of Quebec's English-speaking community. Given the direct impact on English-language education in Quebec, it is imperative that the bill's terminology correctly reflect the legal and structural reality of our school system.

Conclusion

We appreciate the opportunity to share our concerns and recommendations regarding Bill 94. We urge the Ministry of Education to consider the serious implications of these provisions and to implement the necessary support measures to ensure successful implementation. We look forward to further discussions and constructive dialogue on this matter.

Thank you for your time and attention to these important issues.

Sincerely,



Julie Carpentier
President, AAESQ

c. c. : Evelyne Alfonsi, Executive Director, AAESQ
David Meloche, Executive Director, QESBA
Executive Members, AAESQ
Board of Directors, AAESQ