



## *District Parent Advisory Council No. 57*

### *Prince George*

[exec@sd57dpac.ca](mailto:exec@sd57dpac.ca) / [www.sd57dpac.ca](http://www.sd57dpac.ca)

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February 23, 2021

RE: Draft Policy Revision

Thank you for the opportunity to provide input on the proposed policy changes. DPAC struck an ad hoc committee to undergo an extensive review of the proposed changes. Please accept the following input as a formal submission from District Parent Advisory Council SD 57 Prince George.

The most significant change is the separation of policy from administrative procedure. This change is positively received by DPAC as it was often confusing having them all contained in the same place. The lines between the two were frequently blurred and the new format clearly separates them. Further, it is clear who's responsible for what so parents know whether to bring something to the Board or the Superintendent. Both are necessary for SD57 to function well. Unfortunately, DPAC finds that far too much has moved from policy and resides solely in administrative procedures. To understand why DPAC is concerned with this move, we will share our understanding of the differences between the two and then make some recommendations.

#### **Policy and Procedure**

To understand the proposed changes, it is first necessary to establish a working definition of policy and procedure and identify the differences. Through discussion with various members of the board and senior administration, it is apparent that DPAC has a different understanding of the differences. Over the last decade, parents and the public have come to understand that policy is a board responsibility and administrative procedures are the superintendent's responsibility. Draft Policy 2.5, 11.3, and 12.5 appear to reinforce this understanding. On who is responsible for what, we seem to agree. On what they are and how they are developed is where DPAC seems to have a difference of opinion.

The DPAC Ad Hoc committee used the following definitions in their review of the draft documents.

- A **policy** is a guideline or statement of position with respect to a given topic.
- A **procedure** is a set of steps or instructions for completing a task

The following link was also used as a guide to evaluate the proposed changes.

<https://www.ucop.edu/ethics-compliance-audit-services/files/policy-toolkit/policy-or-procedure.pdf>

Draft Policy 10 outlines how policy will be developed and AP 121 outlines how administrative procedures will be developed. Policy development will seek input through the Advisory Committee and APs will have opportunities for input from appropriate stakeholders/rights holders. Draft Policy 10 does not stipulate when consultation would be appropriate, and it should. AP 121 does not specify how input would be sought and it is not included anywhere else in either policy or procedures.



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DPAC strongly believes that when all parties participate collaboratively or consultatively, we as a district, make better, more informed decisions. In order to ensure that this practice continues the following recommendation is provided for your consideration.

#### **Recommendation 1:**

That Draft Policy 10 be reviewed so that language can be added to ensure input and consultation is sought when new policies are developed, or substantial changes are made to existing policy.

*Rationale - When all parties participate collaboratively or consultatively, you as a board, make better, more informed decisions. Further, our district is renown for its relationships with partner groups and this would ensure that continues in the future. The board would still retain sole responsibility for policy.*

As previously stated, DPAC is concerned with how much has been removed from policy and now resides solely in administrative procedures. With that in mind, the following recommendations are provided for your consideration.

#### **Recommendation 2:**

That the board develop an anaphylaxis policy.

*Rationale - [https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m232\\_07.pdf](https://www2.gov.bc.ca/assets/gov/education/administration/legislation-policy/legislation/schoollaw/e/m232_07.pdf)*

#### **Recommendation 3:**

That the board develop a Financial Hardship Policy.

*Rationale – The School Act Section 82 seems to indicate you need one.*

#### **Recommendation 4:**

That Draft Policy 17 reference AP 560

And

That any changes to AP 560 be given a 60-day consultation period or not be implemented until a specified period of time. For example, decisions reached prior to April 30<sup>th</sup> can be implemented in September of the following year, etc.

*Rationale – Parents have had much input into the development of Policy 3541 over the past decade. Parents depend upon bus transportation for a variety of reasons and AP 560 reflects the input received over the years by the board. Draft Policy 2.5.6 and 10.10 both reference the board ensuring that motions which are intended to have continuing effect be integrated into policy. Removing much of the policy into administrative procedures is not in keeping with past policy or draft policy. Further,*



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*a 60-day consultation period allows families some time to explore other options. Simply making changes may mean that some families struggle and experience undue hardship in trying to get their children to or from school to a safe place for care.*

#### **Recommendation 5:**

That the board develop a policy on School Catchment Areas, Registration and Student Transfers.

*Rationale – Parents have had much input into the development of Policy 5119 over the past decade. Although AP 305 captures most of the decisions reached by prior boards, we believe that the board should formally state their philosophy on this issue. The commitment to keeping families together which is reflected in the hierarchy of how limited space will be accessed is a philosophy statement that the board should own. It is a guidance statement that gives direction to the Superintendent as to how to develop the AP or make changes to it. Again, Draft Policy 2.5.6 and 10.10 both reference the board ensuring that motions which are intended to have a continuing effect be integrated into policy. It is believed that the hierarchy system is such a motion of a previous board and likely one that is still valid today.*

The final input DPAC would like to submit concerns Draft Policy 8. Although we understand that there was no intent to restrict DPAC's access to the board or diminish our opportunities to provide input on matters within the school district, we believe in its current structure, the draft policy will result in just that.

On the first Tuesday of the month, the Advisory Committee will meet. Partner groups are invited to send representatives to this committee and are encouraged to provide perspective and advise from the vantage point of the group they represent. This appears to be similar to the structure currently followed for EPPC, Ed Services and Policy & Governance.

On the third Tuesday of the month, the Board Education Committee will meet. Partner groups are invited to attend as observers only. This committee appears to be responsible for what is currently heard by EPPC. Whereas DPAC has been invited to participate in EPPC, we will now only observe. We will rely on the board and senior administration to determine whether parents might like to provide input on any agenda items so they may be forwarded to the Advisory Committee before being passed to the board at a regular board meeting.

On the second Tuesday of the month, the Business and Operations Committee will meet. This committee meeting is closed to the public and partner groups. This committee appears to be responsible for what is currently heard by both Ed Services and Management & Finance. Although DPAC has never been invited to Management & Finance, we have provided input on matters before the Ed Services committee. We must now rely on the board and senior administration to determine what agenda items parents might like to provide input on so they may be forwarded to the Advisory Committee before being passed to the board at a regular board meeting.



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We understand that DPAC may refer a matter to the Advisory Committee, but it is unclear if this would occur before the matter was put forward at a regular board meeting. If an item is referred directly to the board from a committee, DPAC will not have an opportunity to comment until after a decision has been reached. If the matter is of concern to parents, the item may need to be revisited at a future meeting. This does not appear to be an efficient use of the board's time or DPAC's.

On the fourth Tuesday of the month, the regular board meetings will be held. Partner groups will no longer have an opportunity to provide comment or input on the night's agenda until after all decisions have been made, at least according to Draft Policy 7.

DPAC would like to submit one last recommendation for your consideration.

#### **Recommendation 6:**

That the board consider changing the order of the committee meetings to allow for partner group input through the Advisory Committee prior to items appearing on a regular board agenda.

And

That partner groups be given enough notice about what items are likely to be on the next board agenda, so that if they have input or comment, they can request that the item be on the Advisory Committee agenda.

*Rationale - When all parties participate collaboratively or consultatively, you as a board, make better, more informed decisions. Further, our district is renowned for its relationships with partner groups and this would ensure that continues in the future. If only given an opportunity to provide input if the board or senior administration deem it appropriate, DPAC will become less of a partner. The board will be seeking our feedback rather than our input.*

Thank you for taking the time to consider our recommendations.

*Respectfully submitted by Gillian Burnett on behalf of the DPAC executive.*