January 8, 2019

Licensed Child Care Network’s Response to Proposed Amendments: Bill 66 *Restoring Ontario’s Competitiveness Act*: Legislative Amendments related to Child Care and Early Years Programs

**Who is the Licensed Child Care Network (LCCN)?**

LCCN works collaboratively with the community to raise public awareness about the importance of early learning and licensed child care in London and Middlesex. We are a network of child care organizations dedicated to high quality licensed child care and early learning.

Our vision is a community that understands, promotes and champions early learning and quality, licensed child care and licensed home child care settings. We work to achieve this through:

* education strategies that raise public awareness about the importance of early learning and licensed child care;
* the promotion of the profession of Early Childhood Education.

**LCCN Member Organizations:**

LCCN member organizations represent approximately 75% of early learning and licensed child care organizations in London and Middlesex.

**Our Response and Insights:**

The proposed amendments in Schedule Three of Bill 66, Restoring Ontario’s Competitiveness Act, directly impact the entire child care sector, not just home-based child care providers and authorized recreational and skill building programs. Child care operators are currently responsible for extended day programs and for ensuring strict regulations are enforced to meet the sole purpose of the Child Care and Early Years’ Act, as stated below.

*Purposes of Act: 1 (1) The purposes of this Act are to foster the learning, development, health and well-being of children and to enhance their safety*

Licensed Child Care Network, as a collaborative group of child care professionals, would like to provide insight and feedback into the four proposed amendment categories outlined in the Memorandum released by the Honourable Lisa Thompson, Minister of Education, on December 6, 2018. We are pleased to read that Minister Thompson believes that quality child care and early years programs benefit children, to help them better prepare for school and for life. We couldn’t agree more!

As stated in the OCED, “Better educated ECEC staff with specialized training are more likely to improve children’s cognitive outcomes through larger vocabularies, increased ability to solve problems, and increased ability to develop targeted lesson plans (NIEER, 2004). However, it is not only qualifications that affect outcomes; it is the ability of staff members to create a better pedagogic environment that

makes a real difference” (OECD, 2017). LCCN believes in regulated, licensed child care environments to ensure the highest quality of settings for our province’s youngest members. As the province of Ontario moves forward with the intention of supporting families in pursuing their career goals, licensed child care and early learning settings are working to provide safe, healthy, and educational growth for our children. Please review the recommendations provided below, compiled by experienced and educated professionals, working with children and families in Ontario.

* Ratios were previously assessed for change and after community consultation, the proposed ratios were deemed unsafe and current ratios were maintained.
* In addition, the Ombudsman made several recommendations that supported the current CCEYA regulations, following the deaths of several children in the Toronto area.
* The child care and early learning sector is not an industry or an economy-based service, it is a sector that provides human services. Early Childhood Education is education-based and should be aligned with school boards, which are not being addressed in Bill 66. Early learning is now mandated through the Ministry of Education, which research indicates is the appropriate regulatory body.
* Our licensed early learning and child care sector collaborates to provide community-based services that meet the needs of children and families.
* Our child care and early learning community shares concerns about the safety and well-being of children with the lack of qualified professionals and the absence of oversight in unregulated home child care. It has taken child care professionals years of education and experience to provide safe and enriching educational environments for children. These are not skills that one can implement in a child care setting, without appropriate guidance and training.
* We recommend making the early learning profession a competitive profession, to bring more people into the workforce who are properly trained and appropriately compensated. This action will provide more spaces for families wanting to go back to work while their child is in a safe and educational environment.
* We encourage a strong government plan to educate the families of Ontario about making informed choices for child care, in addition to making providers aware of regulations and accountability when providing services for children and families in our province.
* Collaboration between early childhood professionals was necessary to understand these proposed changes. Our concern is around the ability for those, outside of the sector, to understand the impact of these proposed amendments on the safety and well-being of Ontario’s most vulnerable, our children.

Please see below the recommendations by LCCN regarding the proposed amendments.

1. Lowering the age at which home child care providers must count their own children towards the maximum allowable number of children in care, from 6 to 4 years old.

Safety and evacuation concerns with so many young children in one home, if the ratios of the number of allowable children under two are altered.

Currently the CCYEA has parameters restricting the hours when a provider’s own 4 and 5-year-old children do not need to be counted in the maximum allowable number of children in care. LCCN recommends that all 4 and 5-year-old children should be included in the number of children in home-based child care, other than when there is adherence to the current legislation.The proposed higher number of young children allowed in a home child care setting would not allow for children with special needs to be served in an inclusive manner. There would be no additional staffing to support children with unique needs. Children with special needs may require more assistance in an emergency or during regular care routines. Monthly evacuation plans would be challenging to adhere to with a large number of children and one provider. With so many children allowed in a home child care setting, residential zoning would need to be changed to provide this type of business, similar to that of a licensed facility, in order to adhere to community standards.

Insurance is already difficult to obtain for home child care providers so it would be concerning that unregulated home providers may operate without the necessary insurance.

We recommend that all home child care locations be regulated and accountable to an overseeing body to minimize tragedies that have previously taken place with large groups of children being cared for in unregulated settings.

New parents are not always informed about what quality child care environments entail so regulation of home child care is necessary.

1. Reducing the age requirement for authorized recreational and skill building programs that serve children after school from 6 to 4 years old

Licensed child care organizations follow a standard of practice to always adhere to ratio requirements for the lowest age of children in any program. We question whether the ratios for 4-year-olds would be adhered to in recreation and skill building programs in order to provide a safe environment for children 3.8 – 5 years.

Unauthorized summer camps do not have ratio requirements so young children could be part of a very large group, with much older children. This is concerning due to a lack of supervision for the younger children of the group.

We recommend that some qualifications are necessary for extended day programs including Early Childhood Education, Child and Youth Worker, Developmental Service Worker, Ontario Certified Teacher, Social Service Worker and Recreation and Leisure Services. We recommend that these same degrees and diplomas automatically deem educators as qualified staff when working in licensed before and after school programs with children 6-12 years. This would remove the need for these qualifications to be Otherwise Approved, therefore reducing the administrative burden and hiring delays as decisions on Otherwise Approved status are made. This is especially crucial given the shortage of Registered Early Childhood Educators in the child care field.

We highly recommend that the CCEYA requirement for Early Childhood Educators in before and after school programs for kindergarten children be maintained to ensure quality of service for children and families.

RECEs currently working in school boards are not working on non-instructional days and could work as qualified staff members to support extended day and before and after school programs during PD days, March Break and summer holidays. This will help support the workforce shortage.

Recreational and skill building programs need to be prepared to provide additional support for families in need so qualified and trained individuals are necessary to ensure families are receiving the supports they require. This may be the only contact that a family has with social services in their community.

“Access is not a guarantee of high-quality ECEC. Therefore, in many countries, the curriculum framework in pre-primary education has recently been extended to enhance ECEC quality and to ensure

better transition between pre-primary and primary education” (OECD, 2017). As the province works towards better preparing children for school, it is important that child care and early learning settings are using the provincial mandated framework to provide quality education at the pre-primary level. To be competitive in the world market, Canadian provinces need to be at the forefront of research in education. *Starting Strong 2017 Key OECD Indicators on Early Childhood Education and Care* provides a useful resource of current research in the world market for Early Childhood Education.

1. Increasing the number of young children that home child care providers can have in their care, from two under 2 years old to three under 2 years old, and

This change causes some major concerns related to safety, health and wellness of children. Concerns were identified with the risk of an operator attempting to evacuate 3 non-walkers plus additional children, in the event of a fire.

Related legislation has been tightened recently to avoid tragic situations that have taken place in recent years. This proposed amendment appears to be back-tracking our provincial checks and balances to ensure quality in child care environments.

The home caregiver would not be able to safely transport school age children to and from school each day, with the proposed number of 3 children under the age of 2 years. The ability to eliminate a caregivers’ own children ages 4/5 from the ratios could significantly increase the number of young children being transported to and from school each day.

A home care provider works independently in an environment without breaks and could potentially work very long hours. These standards could compromise the safety and well-being of children in their care when no oversight is being provided. The well-being of home child care operators is instrumental in the care our children are receiving in Ontario.

Outdoor activities would be limited with 3 children under the age of two and with additional children being counted in ratio in home child care. We have concerns regarding the limited opportunities for outdoor play that is so crucial for the mental and physical well-being of children.

By increasing the number of children in a home child care, the child care fee rates will not decrease to make child care more affordable. Home child care providers will keep their fees in line with the licensed child care sector, so these proposed amendments will not impact affordability in child care rates.

From our understanding, there is a proposed amendment to support the idea of 2 caregivers in a home, with double the number of children under the age of 2. This increased number of children in a home is

concerning as it relates to the safety and well-being of children. Six children under the age of two along with additional children in ratio would indicate a large safety risk in the event of an emergency. The ratio in regulated child care for children of this age is 1 adult to three children to ensure health, safety, wellness and education are at the forefront of caring for young children. Additional children in ratio reduces the safety, health, wellness and educational opportunities for our youngest children to be well prepared for school and life.

4. Removing the restriction that a parent must receive financial assistance before in-home services can be provided for their child.

No concerns were discussed around this proposed amendment.

In conclusion, we thank you for this opportunity to provide input into the proposed amendments under Bill 66, Schedule 3. We look forward to consulting with you in the future regarding any further proposed amendments to the Child Care and Early Years Act, amendments that directly impact the children and families in our communities.

Resources:

OECD, 2017. Starting Strong 2017: Key OECD Indicators on Early Childhood Education and Care. Retrieved from <https://read.oecd-ilibrary.org/education/starting-strong-2017_9789264276116-en#page1>