



Canadian Federation of University Women
ONTARIO COUNCIL



**CFUW Ontario Submission to the Consultation Document
Regarding Proposed Regulatory Amendments under the
Child Care and Early Learning Years Act, 2014**

November 16, 2020

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Proposed Regulatory Amendments

Response by CFUW Ontario Council

November 16, 2020



Regulatory Registry Feedback
c/o Early Years and Child Care Division
Ministry of Education
315 Front Street West. 11th Floor
Toronto ON M7A 0B8

Re: Proposed changes to the Child Care and Early Years Act

The Ontario Council of the Canadian Federation of University Women (CFUW) welcomes the opportunity to provide our recommendations to the Ministry of Education concerning the proposed regulations to the Child Care and Early Years Act.

The 4,800 members of CFUW Ontario Council throughout Ontario are committed to quality, regulated, affordable childcare for all Ontario families. Childcare remains a top priority, especially, during this uncertain time for families, as many women struggle with returning to the work force.

We understand how important it is for our children to receive quality care and early learning during their years of development. Children who receive a good start in life are healthier, happier, and are open to future opportunities such as continued education and employment. This all goes together to improve our communities, therefore reducing stress on our social programs and hospitals.

CFUW Ontario Council's position: "the creation of a quality, universally accessible and comprehensive early learning and child care program which emphasizes the development of the whole child." that is:

- "accessible and affordable to Ontario families no matter what their income, employment status or where they live and work.
- comprehensive and flexible enough to meet their families' needs.
- developed with parent and community participation to meet the social; physical, language and intellectual needs of their children in a caring and safe environment.
- developed to ensure optimal use of public funds and public accountability.
- funding for this should involve all levels of government through cost-sharing mechanisms, as in other human services such as health, education, and social programs.



The **Ontario Council of the Canadian Federation on University Women** (CFUW Ontario Council) would like to commend the Ontario government for its initiatives in the Child Care & Early Learning Years Act, (CCEYA) 2014. The commitment to building a system of quality, affordable childcare for all Ontario families is clear from recent actions taken by the government of Ontario:

- Conducting a five-year review of the (CCEYA) as promised.
- The introduction of the **Childcare Access and Relief from Expenses (CARE) tax credit**. Families with an income no greater than \$150,000.00 per year can receive a tax credit for up to 75% of your receipted childcare expenses, up to \$6000 per child under age seven.¹
- Committing 1 billion dollars over the next five years to increase 30,000 childcare spaces in schools, including,
- The addition of approximately 10,000 spaces in new schools in the 2019 Ontario Budget.²

As the five-year review has come within the Covid-19 restraints, it is especially challenging to evaluate the proposed changes to the Child Care & Early Years Act. (CCEYA)

There are two areas of concern with the proposed changes to the Child Care and Early Years Act 2014, that Ontario Council has identified. They are:

1. A1. Schedule 2 – Requirements for Age Groupings, Rations, Maximum Group Size, and Proportion of Qualified Staff

Ontario Council understands that childcare, primarily in urban areas is in short supply and high demand. It is a frustration for families to not be able to access, registered, quality, affordable childcare when they need to be in the workforce. However, this cannot come at a cost to the centres and the Registered Early Childhood Educators (RECE) who work to provide a safe, nurturing environment to infants and toddlers.

At this present time, the Covid-19 pandemic has highlighted the need for safe child care as parents contemplate the safety of their children in care and the need to return to their jobs outside of the home environment. In a recent Toronto Star article, Katherine Scott, senior researcher with the Canadian

¹Childcare today.ca ADCO the Association of Day Care Operators of Ontario

²News Ontario.ca



Centre for Policy Alternatives, stated “Child care should be made more accessible, as part of the recovery, adding it “pays for itself”, putting more women into the economy”,³

Research has shown that overlapping the age range and changing the ratios is not a good idea for the following reasons:

- Infants have special needs to be nurtured and feel secure with a limited number of care givers in an intimate environment.
- Quality of care is defined not as the form of care (e.g., in the home, or in a centre), but the provision of nurturing relationships, a stimulating environment, and basic health and safety.⁴
- In large group settings small children, primarily infants, can become upset and confused.
- Childcare, outside of family members is often incredibly stressful for parents. They need to be assured their infant is not spending their day fighting for attention.
- Toddlers primarily after 24 months require activities that will stimulate their growth and development both socially and academically.
- Stressful for RECE’s to adapt to larger groups with different needs.

2. Qualification Requirements

Registered childcare centres in Ontario are the safest place for parents to send their children. Parents put their trust in regulated child care to ensure their children receive the best care at all stages of growth and development. RECE’s are the insurance that parents need for stable emotional and academic nurturing.

They are the relationships that children develop outside of their families. Registered Early Childhood Educators, (RECE) are educated to know the stages of growth and development in children of all ages, particularly in the primary grades. They are in fact mentors and use their specific education to provide care to each individual child.

³Toronto Star, Saturday, September 12, 2020 Section B

⁴www.child-encyclopedia.com

For the following reasons, we are concerned with the reduced qualification requirements to support workforce retention:

- RECE's possess specific talents and skills that are targeted to support the quality of early childhood education and child care programs that are expected from Ontario families
- If child care centres do adopt this hiring method, this will further erode the value of a professional RECE.
- Of concern in Ontario, particularly in regulated child care, early childhood educators are leaving the sector and replacements cannot be recruited, which has had an on-going negative impact on staff consistency and stability, and program quality.⁵

Ontario Council of the Canadian Federation of University Women are concerned with the review of the Act at this present time. In their report of *Ontario's Child Care Regulation Proposals October 2020* the Ontario Coalition For Better Child Care, (OCBCC) stated; *Rather than watering down regulations, the provincial government should focus their immediate efforts on funding to stabilize the child care sector that is struggling to survive during the pandemic. They should follow through on a workforce strategy with decent work and wages at its core*⁶

CFUW Ontario Council for the following reasons agrees with the OCBCC, that during this time we request that the provincial government postpone the review and proposed changes to the Child Care and Early Years Act, 2014 until a time when families and child care centres are in a better position to cope in a post Covid-19 crisis. They need financial help, and parents need places for their children that deliver quality safe childhood development.

- Safe child care is vital for women to be able to return to the workforce. During this time of Covid-19 families are struggling with uncertainty and keeping their families safe at home, school and in child care is a priority.
- The Federal Government has allocated⁷ nearly \$147 million in 2020–21 for early learning and childcare investments in Ontario. Although it will be paid out over several years, this funding could be used to pay better wages and benefits to qualified RECE's to retain staff and put increased safety measures in place through out child care centres.

⁵<https://www.aecce.ca/tags/advocacy>

⁶Ontario's Child Care Regulation Proposals, October 2020, OCBCC

⁷<https://www.canada.ca/en/employment-social-development/news/2020/09/the-government-of-canada-and-the-government-of-ontario-announce-additional-support-for-quality-early-learning-and-child-care-across-the-province>.



- As of September, only just **over half of Ontario's 5,523 child care centres** have reopened, with one advocate linking the issue to staffing problems and the overall back-to-school plan by the provincial government.⁸ This is a clear indication that centres are struggling to survive. Rather than tampering with staff to child ratios and group sizes, this is the time to financially support the quality of staffing and centres so that they are able to reopen, giving parents the confidence needed for them to leave children in the care of others.

Ontario Council of the Canadian Federation of University Women (CFUW) is a voluntary, self-funded, non-profit organization with 49 clubs across the province, and is affiliated with the National CFUW.

Our mandate is to promote education and life-long learning, to encourage the participation of members in their communities and to enhance the status of women and girls.

Our main concerns include high quality public education, universal health care, a clean safe environment, the economic security of women as well as the prevention of violence against women.

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⁸<https://www.iheartradio.ca/newstalk-1010/news/just-over-50-per-cent-of-ontario-daycares-have-reopened-as-school-nears-1.13367804>