



**Association of Early Childhood Educators Ontario
Submission to the Standing Committee on General Government
In response to Bill 66: Restoring Ontario's Competitiveness Act**

Submitted by:
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The Association for Early Childhood Educators Ontario (AECEO) is the professional association for early childhood educators (ECEs) in Ontario. We support ECEs in their professional practice and advocate for recognition and appropriate compensation for early childhood professionals, so they can provide high quality programs for children and families. Well educated, well paid and competent early childhood educators are fundamental to high quality early years and child care programs that support children and families across the province. Our members work throughout Ontario in programs for young children and their families, including home based and centre based child care, full-day kindergarten, EarlyON programs and as Resource Consultants who provide services and support for children and families with disabilities.

The AECEO also advocates for a high quality, publicly funded early childhood education and care (ECEC) system that serves children from 0 – 12 years old, one that provides professional wages and working conditions for the ECE workforce. We believe the Ontario government has a critical role to play in funding and planning the ECEC system, and a responsibility to ensure that Ontario’s children and families have access to quality services and that ECEs are well-compensated for the socially valuable work they do.

The AECEO is deeply concerned by the regulation changes to the *Child Care and Early Years Act, 2014*, the *Education Act*, and the *Employment Standards Act, 2000*, proposed in Bill 66. These changes will lead Ontario in the wrong direction, one that compromises the quality of care and education for young children and does not contribute to purposeful system building.

The Ontario Government describes their priorities as:

1. Reducing red tape and administrative burden
2. Making child care more affordable
3. Increasing choice and availability for families, and
4. Improving quality and delivering high standards of care (Ontario Ministry of Education Memorandum, December 6th, 2018).

The AECEO believes that the regulation changes proposed in Bill 66 will jeopardize quality and high standards and does not improve the availability or affordability of early childhood education and care for families.

Before and after school programs

The repeal of Paragraph 2 of subsection 259 (2) of the *Education Act* will have a negative impact on both quality and high standards of care as it would remove the requirement for 3rd party operators providing before and after school care for School Boards to have early childhood educators (ECEs) lead their programs. Ontario ECEs have specialized knowledge of child

development and pedagogy in the early years. They create rich, inclusive, learning and care environments that are inquiry based. We know from research and experience that high-quality early childhood education and care is directly linked to well-educated and qualified ECEs. Removing the requirement of ECE led 3rd party before and after care programs directly jeopardizes the quality of experiences for young children. Before and after care for 4 and 5-year-olds should be provided by well-educated and well-compensated ECEs.

Our vision is for all of Ontario's children and families to have access to high quality, affordable, ECEC programs where RECEs and program staff are well supported with professional pay and decent work. This vision is founded on the assumption that ECEC is a public good and a human right, not a commodity. In turn, we believe that ECEs are uniquely prepared to plan and implement high quality, meaningful early learning and care programs for young children. Leaving the care and education of kindergarten-aged children up to market competition in this way – by promoting cost cutting for school age program operators through loosening qualification standards - and permitting the hiring of individuals without early childhood education (or other child related preservice training) credentials for their school-age programs does not align with what the AECEO believes is in the best interest of Ontario's children and families.

While the government suggests that reducing staffing eligibility in this repeal will support the creation of board-run before and after programs, the AECEO believes that this move is premature in the current Ontario early childhood education and care system. Long-term studies examining the relationship between staffing qualifications and ECEC delivery systems show that lower staffing eligibility requirements while other components of the ECEC system are also fledgling, powerfully diminishes quality. Especially now, this method of removing barriers for creating before and after care for young children is not an appropriate approach for Ontario. The AECEO recommends that the Ministry of Education consider methods that lead to the creation of children's programs that provide well-compensated positions with decent working conditions for ECEs, who are best positioned to provide quality care and education for our youngest members of society.

Home child care

The repeal of subparagraph 2 iii of subsection 6 (3) of the *Child Care and Early Years Act, 2014* would allow home child care providers to care for three children under two years of age, as well as the additional allowable children over the age of two. Simultaneously, the repeal of Paragraph 2 of subsection 6 (5) of the Act allows for home child care operators to care for any number of their own children over 4 at the same time. It threatens the safety of the care environment that home child care operators will no longer be required to count their own children aged 4 and over in their ratios as this ultimately could lead to well over the legislated 5 or 6 children being cared for in the home. Increasing the number of allowable children under two years of age is

concerning not only in terms of the jeopardized safety of the children in care, but also in the compromised time for and quality of engagements and interactions between caregiver and each child, which we recognize as crucial to young children’s well being.

While licensed home child care operators are accountable to Ministry licensing standards, we are also troubled by the presumption that in order to address significant problems of affordability and access to child care, Ontario’s response is to increase the burden of responsibility on an already devalued and gendered workforce. ECEs deserve the opportunity to make a professional wage and have decent working conditions while operating home-based care. The AECEO stands by our commitment that it is in the best interest of ECEs, children, and families that Ontario addresses problems in affordability and accessibility by building additional capacity through system-planning and government funding, rather than expecting already over-worked and over-burdened ECEs to take on additional responsibilities.

The repeal of Paragraph 2 of section 7 of the *Child Care and Early Years Act, 2014* also presents a concern for the AECEO. In the current ECEC system, removing the requirement that you must be a licensed home child care agency to organize, monitor, or provide administration to home child care services opens the door to problematic possibilities for how these services are organized, skipping over careful, systematic, examinations of alternative models of home child care administration.

These regulatory changes will reduce quality

In our current context, where child care is delivered through a market model, we continue to see a priority on profit and cost savings as opposed to quality. The message that “Ontario is open for business” can include a strong story of how a well-operated, publicly funded, high standards meeting early childhood education and care system *supports* economic development in this province. The potential implications of focusing on profit and cost-saving *within* the business of delivering child care is more problematic. The AECEO is worried about operators who continue to, or begin to, organize child care services under this new priority of “open for business.” We believe that the care and education of young children is best provided through a planned system that is publicly funded and disagree with regulatory changes that encourages the expansion of commercial enterprises into the ECEC sector.

In revisiting the priorities as described by The Ontario Government, we believe these regulatory changes do not meet the desired goals:

1. “Reducing red tape and administrative burden”

Reducing staffing qualification requirements under the Education Act will not reduce red tape or administrative burden. It will, however, encourage and allow for the expansion of

before and after care programs that are not led by ECEs and are not aligned with best practice and research on the care and education of kindergarten aged children.

2. “Making child care more affordable”

Increasing the number of allowable children in licensed and unlicensed home child care will have no direct impact on affordability for families. Many ECEs who operate home child care struggle to make ends meet in the current system – and fees remain high for families. We recommend that to appropriately address affordability, the government must consider base funding which supports both lowering the cost of services while ensuring appropriate compensation for ECEs.

3. “Increasing choice and availability for families”

Decreasing regulations and increasing the number of younger children in home-based care does not ensure that choice and availability for families will increase. In fact, these regulatory changes continue to ensure that services will be left up to the market, which has failed to meet families’ needs. We urge the government to reconsider their approach and take responsibility to ensure that child care services are funded, planned, and meet the needs of families, equitably, across the province. A publicly-funded system will ensure that families have choices in how their children receive care and that spaces are available to them no matter where they live in Ontario.

4. “Improving quality and delivering high standards of care”

There is no indication that the proposed regulatory changes will improve the quality of care in Ontario. In fact, research evidence suggests that many of the changes will result in the opposite: quality will decline. By increasing the number of young children in care and allowing additional children to be cared for in the home, we are increasing the burden and workload on our valuable ECEs. Decades of research consistently associates higher quality child care with *lower* adult:child ratios.

Additionally, repealing sections of the *Employment Standards Act, 2000*, would

- eliminate the requirement for an employer to apply to the Director for approval allowing some or all of its employees to work more than 48 hours per week
- eliminate the requirement for an employer to apply to the Director for approval to permit an employer to average an employee’s hours of work in determining entitlement to overtime pay.

The AECEO believes that these changes do not reflect decent work principles and will further stretch RECEs who are already working long hours to maintain legislated staff to child ratios.

These changes will add to the pervasive inequalities in the workplace that RECEs are already experiencing and will most certainly jeopardize the quality of care Ontario's children receive.

The AECEO confidently states that ECEs benefit when they are well supported and can attend to and engage with the children in their care purposefully and meaningfully. In turn, children and families benefit from higher quality programs when ECEs are well supported and well compensated. From this perspective, we believe the government must reconsider their approach and take on their responsibility of funding and supporting early years services and ECEs.

We urge the government to withdraw Bill 66 and to engage in a full public consultation process on all of its provisions with respect to the Early Childhood Education and Care system in Ontario.