

*COALITION ONTARIENNE POUR
de meilleurs services
éducatifs à l'enfance*



*ONTARIO COALITION FOR
Better Child Care*

**Submission to the Committee on Social Policy in response to
Bill 10: The Child Care Modernization Act**

November 18, 2014

Introduction

The Ontario Coalition for Better Child Care (OCBCC) was founded in 1981 to advocate for universal, affordable, high quality, not-for-profit child care in Ontario. The Ontario Coalition for Better Child Care represents over 700 members – both passionate individuals and organizations committed to furthering high quality child care in Ontario.

The Ontario Coalition for Better Child Care was a participant in the recent Child Care 2020 national conference in Winnipeg, aimed at putting child care back on the national agenda. While at the conference we discussed Bill 10 with scores of Ontarians attending the conference: researchers and policy experts, parents and child care providers, politicians and trade unionists. This re-affirmed conversations that the OCBCC has had with its members over the past year on this Bill.

We would like to highlight four areas of broad consensus here including important ideas that our partner organizations have also put forward.

1. Protective measures.

Ontario Ombudsman André Marin's recent report "Careless about Child Care" makes clear the need for concerted action to address issues related to unregulated care. Bill 10 addresses many of the Ombudsman's recommendations to strengthen oversight and enforcement. There is strong support among our members in the child care community for the many protective measures provided in Bill 10. This includes broad support for the move to include unregulated providers' own children in the total number for whom they are allowed to provide care. Currently, Ontario is alone amongst provinces and territories as being the only jurisdiction where unregulated providers could potentially look after more children than regulated providers. We strongly support the government's move to correct this imbalance.

In the area of licensing and enforcement we urge the government to go further in some areas, including:

- a. We recommend that the Government enshrine its new dedicated enforcement unit into the legislation so that it cannot be removed on the whim of a future government;

- b. We recommend that the term “premises”, as in Part 2, 6. 1 of the Act be amended to read “provider’s primary home residence”. The term “premises” is much too broad and therefore open to abuses such as the provision of “home” child care in rented storefronts;
- c. There remain licensing exceptions around the care provided for school-age children. We ask that the government remove these exemptions and recognize the important role that before and after school programs play in the life of a child, who may spend as many hours in these programs as they do in school.

2. Children with disabilities.

It is our position that there needs to be a strong equity statement that particularly pertains to children with disabilities. Many members were surprised and troubled to learn that Bill 10 does not address issues for children with disabilities/special needs/extra support needs. While the Ontario Human Rights Code protects these children in principle, in practice these children and their families are all too often turned away from child care programs that cannot, or do not think that they can, accommodate these children’s needs. This legislation provides the opportunity to enshrine the inclusion of young children with disabilities in legislation.

We therefore recommend that the Ontario government craft a strong and inclusive equity statement similar to that in the *Education Act* that mandates the inclusion and acceptance of all children including those of any race, ancestry, place of origin, colour, ethnic origin, citizenship, creed, sex, sexual orientation, gender identity, gender expression, age, marital status, family status or disability.

3. Charging of fees by school boards.

Schedule 4 – 2 begins to address issues around over-charging by school boards to child care programs located in schools. This has been a major concern for many small non-profit programs in schools, a concern that threatens the viability of those programs. It is our position that the legislation should go further and stop the charges to non-profit child care centres in schools. These costs must not continue to be downloaded on to non-profit programs that lack the capacity to absorb them.

4. Next steps.

Bill 10 must be seen as the beginning of the Ontario government's work on child care, not the end.

- a. We support the call for a **Minister's Round Table** with representation of early childhood educators, parents, child care centres and organizations, family child care, unions, advocates, and other stakeholders. As we saw last year, there was deep and widespread concern in the child care community that last year's one-way comment process on the proposed changes to Regulation 262 was inadequate. We believe that convening a Minister's Round Table that provides broad representation from the child care community would fulfill the open government approach that this government has committed itself to and would ensure the full consultation with the child care community that is needed.
- b. We support the call for a **workforce strategy** by the Association of Early Childhood Educators of Ontario and others, to address the longstanding issues of recruitment, retention and compensation facing the Ontario child care workforce, as well new work force issues brought on by the introduction of full day kindergarten.
- c. We continue our call for a **moratorium on licensing for-profit child care** to help ensure quality programs and as a first step to moving to a more publicly managed system with public and non-profit delivery. Given research evidence on the quality advantage of public and not-for profit programs, the provincial government should ensure our child care system is expanded in through public and not-for-profit delivery.
- d. Finally, we urge that the Ontario government move immediately to the **development of a comprehensive child care system** in this province. As we wrote in a recent article for the Toronto Star: "Ontario desperately needs a comprehensive system based on the principles of universal entitlement, high quality, and comprehensiveness. It will require not only vision and a well-designed policy framework with long-term goals, targets and timetables, but also political will and ongoing sustained funding. And now is the time to start.... With child care finally back on the national agenda, there is no time like the present for the Ontario government to regain its leadership to move toward a real system of quality child care."