

# “AN INSULT TO EDUCATORS, CHILDREN AND FAMILIES”

Child care community views on the Ontario  
government’s proposed changes to the  
*Child Care and Early Years Act.*

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**Better Child Care**



aeceo  
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## INTRODUCTION:

The Association of Early Childhood Educators Ontario and the Ontario Coalition for Better Child Care carried out a joint survey of the child care community - educators and parents - on the Ontario government's proposed changes to the child care community. The online survey asked respondents their views on the government's proposed changes: to age ranges, staff to child ratios and group sizes (Schedule 2); staff qualifications; before- and after-school programs; and an unlicensed child care registry.

The survey was completed by 2,443 respondents, of whom 1,693 were Early Childhood Educators and 741 were parents with children in child care. The survey found overwhelming opposition to some of the proposed regulatory changes. Respondents were especially concerned about changes to age ranges, ratios, and group sizes and staff qualifications, and expressed uncertainty and confusion with a registry of unlicensed home child care.

## SCHEDULE 2: AGE RANGES, STAFF CHILD RATIOS AND GROUP SIZES

### THE PROPOSAL

The Ontario government is proposing adding an alternative set of age ranges, staff to child ratios and group sizes, called "Schedule 2". Child care operators could apply to the Ministry of Education to operate with Schedule 2 age ranges, ratios and group sizes instead of current requirements. No criteria for application have been provided in the posting.

Under Schedule 2 Infant and Toddler age groups could be combined. This means children from birth to two would be in the same group, with an increased maximum group size of 12 (up from 9 for infants). The Preschool Age Category would include children from 24 months – 5 years old. Currently children younger than 30 months are classified as toddlers. For children from 24 to 30 months this would raise their staff to child ratio from 1:5 to 1:8 and their group size from 15 to 24 children. The Kindergarten Age Category would be increased to include children from 44 months old (apx 3.5) to 7 years (an increase from 5.5 years), with a staff to child ratio of 1:13 and a maximum group size of 26. The Primary/Junior School Age Category would remain defined as children aged 68 months (5.5 years) – 13 years, yet the staff:child ratio would increase to 1:20.

### COMMUNITY RESPONSE

- More than three quarters of respondents were opposed to all Schedule 2 proposals
  - 90% of respondents were opposed to combining Infant and Toddler age groups
  - 87% opposed proposed changes to Preschool age groups
  - 77% opposed proposed changes to Kindergarten age groups
  - 81% opposed the proposed changes to School Age groups
- For all age groups, an overwhelming majority of respondents were concerned that the Schedule 2 changes would negatively impact the quality of care and education; children's emotional and physical safety and well-being; and the well-being of staff.

## INSIGHTS

*“Such a bad idea. This will decrease quality programming while increasing stress and burn out in ECEs and negatively impacting the safety of children.”*

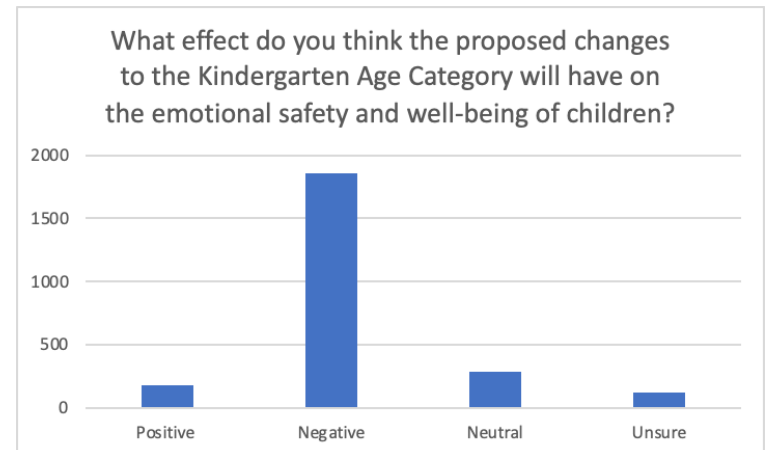
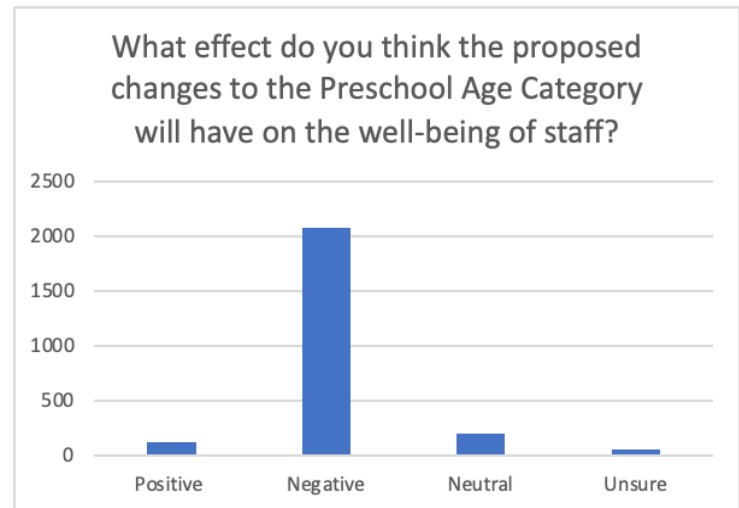
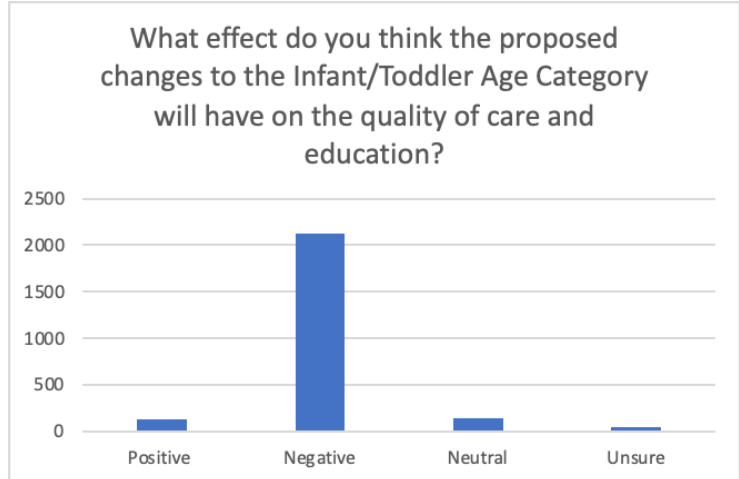
*“I feel strongly that this proposal is a dangerous proposition. Children's needs will not be met, learning will be limited and there will be an increase in serious occurrences.”*

*“As a parent I would not feel comfortable sending my crawling 6 months into a room with running two year olds. Also infants are all on their own schedule. How are staff going to be able to give the best quality care running around with all those infants and toddlers.”*

*“Educators need to be able to support non-walkers at the same time as toddlers who are running full tilt. There is not enough staffing in [Schedule 2] to support the needs of all the children in the numbers and ages being proposed. This will negatively affect the educators and children in their care.”*

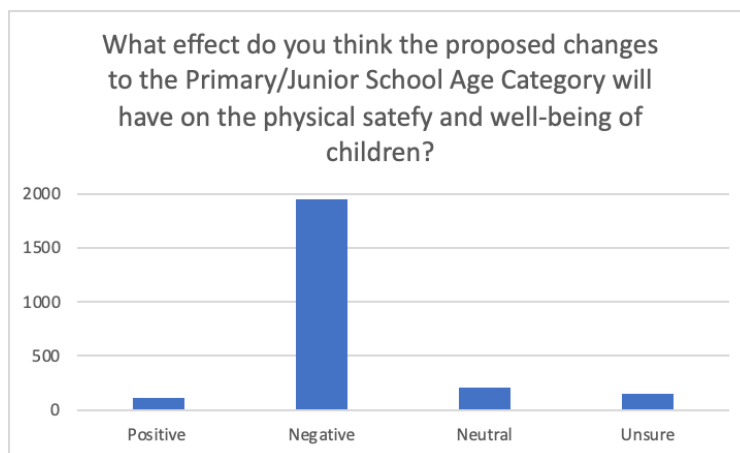
*“2 year olds are very different developmentally than a 5 year old. I have children both ages and while they can play together, emotionally and developmentally, they are quite far apart. The younger ages need more adults present and lower ratios. Lower ratios are required for the safety of everyone.”*

*“Children will not get the programming or engagement they require and deserve. Staff will be burnt out in a field that already faces this on a consistent basis. Expecting staff to be able to offer quality programming and care while adding an additional 8 children to the room will not be feasible!”*



*“The age span is too great and numbers ridiculously high. This is not safe [nor does it] provide for real individual connection.”*

*“Irresponsible and thoughtless!! It’s unfair to the children.”*



## QUALIFICATIONS

### THE PROPOSAL

The government is redefining “qualified employee” for kindergarten and school-age groups to allow individuals with child and youth care, recreation and leisure, or teacher qualifications to be added to the list of qualified employees, in addition to Registered Early Childhood Educators. But since only one staff would require qualifications, these programs could run *without* an RECE.

The government is proposing to allow unqualified short-term supply staff to fill the positions of qualified staff for up to two weeks. Given that only one staff per group is required to be qualified, these groups would be without any qualified staff for up to two weeks at a time. The government is proposing to remove a requirement that supervisors of licensed child care centres have at least two years of experience in licensed child care.

### COMMUNITY RESPONSE

- The majority of respondents opposed all of the proposed changes to staffing qualifications
  - 62% opposed redefining “qualified employees”, only 23% supported the proposal with 14% unsure.
  - 68% opposed allowing unqualified short-term supply staff to replace qualified staff, 20% supported the proposal and 13% were unsure.
  - 65% opposed changes to supervisor qualifications. 24% supported the proposal and 11% were unsure.
- Across all three proposals, the majority of respondents expressed concern that these changes would negatively impact the quality of care and education; the emotional and physical safety and well-being of children; and the well-being of staff.

## INSIGHTS

*“ECEs are qualified professionals. Decent pay and respectful working conditions will support and retain staff”*

*“Early Childhood Educators receive extensive training in child development, behaviour guidance and curriculum development. Use of staff without proper training in all of these areas will negatively impact the quality of learning experiences being offered. It also negatively impacts any strides made by Early Childhood Educators to gain more recognition for the profession.”*

*“Profit making centres will abuse this.”*

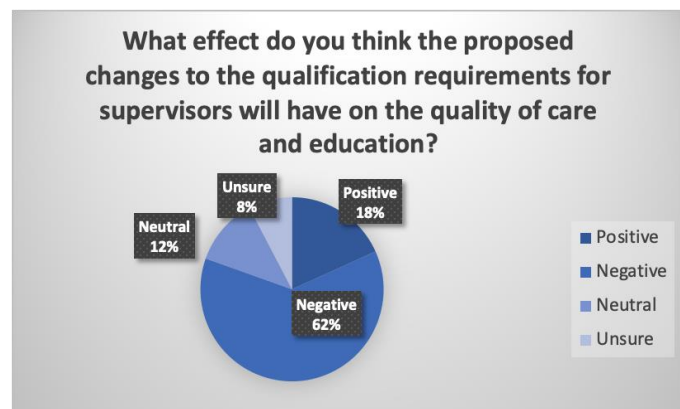
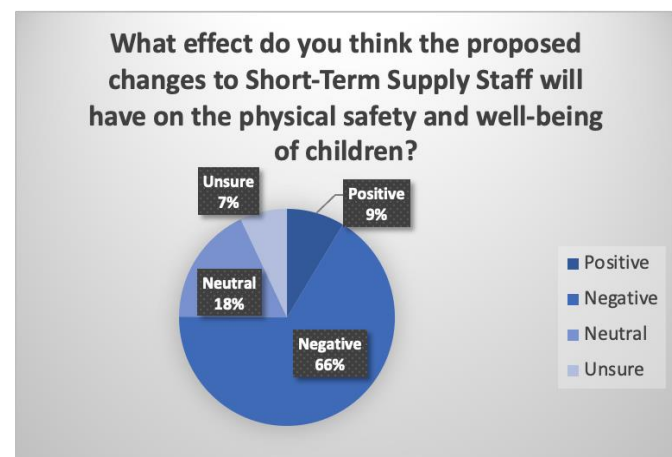
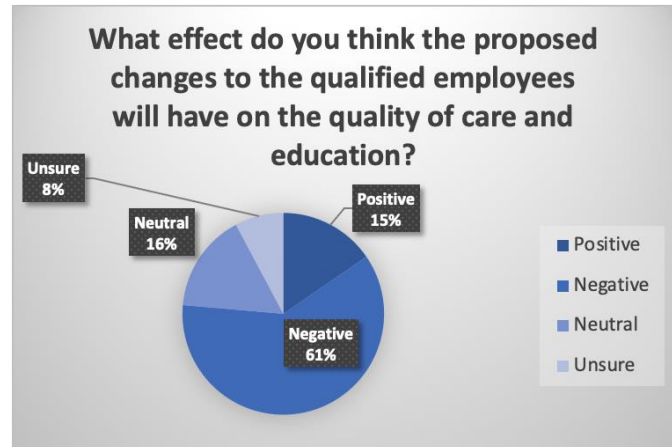
*“Early Childhood Educators have fought for decades to have their work recognized and valued as being professional. These changes completely undermine years of education and continuous professional learning by (mainly) women who are passionate about providing care and education of the highest quality to our youngest citizens. These changes perpetuate the devaluing of early education, of RECEs and of women.”*

*“As a professor teaching within this sector, I know that my pre-service students are trained rigorously to run and maintain these programs professionally, effectively and age appropriately. We are already a very undervalued and under compensated field. These changes undermine the qualifications we have worked so hard to be recognized for. This will have drastic effects on the image of our field and diminish quality of care.”*

*“If our dentist is on vacation, we don't let someone else fill our cavities. When ECEs are away, another qualified professional takes their place. Remember in Ontario ECEs are a regulated profession.”*

*“How can you expect someone will be successful at a job where they are expected to lead their staff appropriately when the supervisor has no experience in the field of their staff members.”*

*“Pedagogical leadership is of the utmost importance in this sector especially from managers and supervisors. Childcare centres are not just businesses that run using managerial, they are places of care and education where young children spend their time when they are not at home or in school. These are*





places that are guided by the Province's own pedagogical document, *How Does Learning Happen?*. It is critical to quality and safety that supervisors know what it is like to work as an ECE in childcare so that they can lead with compassion and a deep knowledge of pedagogy.”

## BEFORE AND AFTER-SCHOOL PROGRAMS

### THE PROPOSAL

When the Child Care and Early Years Act was introduced there was a cap of three hours per day placed on recreation programs to avoid a 2-tier system of before- and after-school programs. The current proposal would remove the cap for selected Authorized Recreation and Skill Building Programs, allowing them to operate both before and after school. These recreation programs would be functioning as child care programs but without the same licensing criteria as child care programs or the same qualification requirements for staff.

### COMMUNITY RESPONSE

- 48% of respondents were opposed to the proposal with only 21% in favour;
- A large portion of the respondents were confused about the proposal, with 31% unsure.

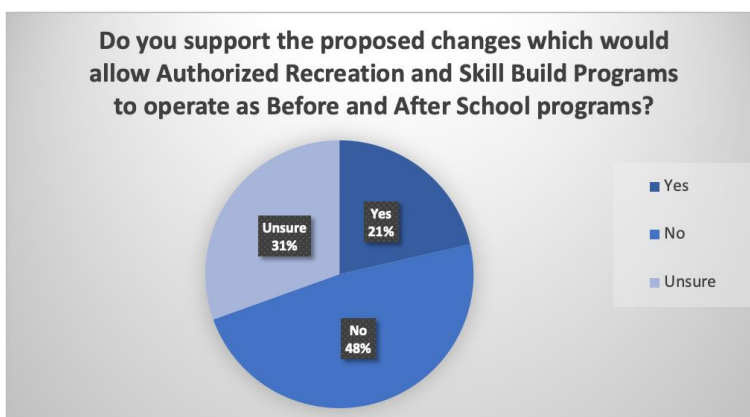
### INSIGHTS

*“I have seen too many after school programs offering subpar care and getting away with it because of this clause and to increase the umbrella to blanket certain organizations would be a huge mistake.”*

*“A before- and after-school program should only be allowed to run 3 hours per day or it should follow the license regulations for full day programs. The government should not be choosing providers but should allow anyone who meets the requirements.”*

*“As a parent, I have had my children in many before and after school programs over the past 10 years. I can say without a doubt that programs run by qualified educators are far superior. Programs such as this need to be held accountable for the care and education that they facilitate. Group size, educators training and qualification, should be moderated within the CCEYA to ensure accountability and quality.”*

*“Many Authorized Recreation and Skill Build Programs do not have acceptable procedures for attendance, safety, supporting children with special needs and/or other vulnerabilities. And, their staff often have less training than those in licensed school age child care. For parents it's hit and miss as to whether your local recreation program is well run. That's not good enough. We need higher training and procedural standards not lower and not longer periods of time.”*



# UNLICENSED CHILD CARE REGISTRY

## THE PROPOSAL

The government is consulting on the idea of an unlicensed child care registry – a government sponsored website that would advertise unlicensed home child care providers. Unlike a licensed home child care, a registry would not provide oversight or regulation of these home child care providers.

## COMMUNITY RESPONSE

- 60.7% of respondents were either opposed or unsure of the registry, with 39% in support.
- Respondents expressed confusion over what this proposal would look like, including whether it would be a mandatory or voluntary register or whether it would provide oversight.
- Of those in support of the registry that left comments, 40% indicated they thought a registry would ensure accountability to, and oversight by, the Ministry of Education.

## INSIGHTS

*“I think this will confuse parents and they will think that they are licensed by the Ministry because they are listed by them. There are already plenty of ways that unlicensed daycares get the word out about their availability, like [social media] and word of mouth.”*

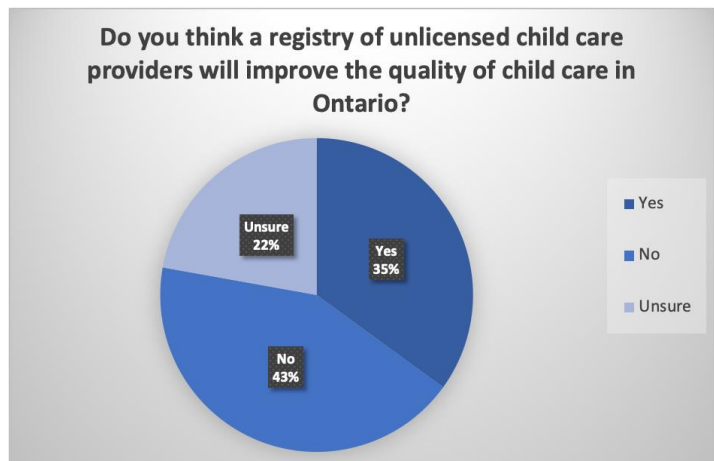
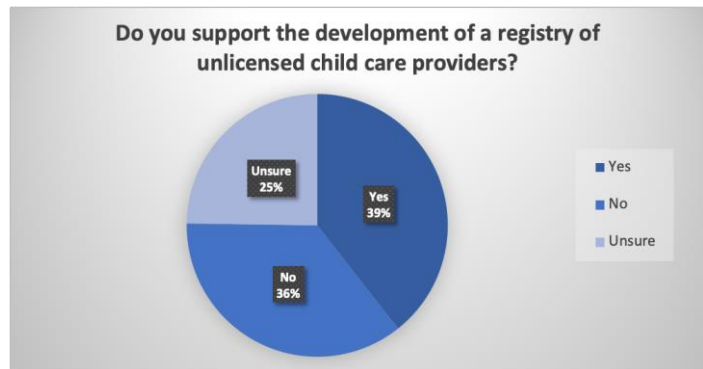
*“I am a parent who currently has my child in unlicensed care. Not because I think it's the best for her, but because I was left with no other options during the pandemic. At a systemic level, a greater reliance on unlicensed care is problematic as there is no oversight of anything. This is why a registry of unlicensed care facilitated by the government is a major red flag. Parents will assume that if the government is monitoring the registry, they are monitoring the care occurring in these centres.”*

*“I don't fully know what this will look like? Does this make it easier to report unlicensed daycares to College (of ECE) or the government?”*

*“A registry would at least identify those in unlicensed care and would create some level of accountability if something goes wrong. It would provide parents with a better sense of security if they are at least registered.”*

*“I think unlicensed child care should be registered as means of accountability for the parties accessing them. They would have means of monitoring by the government of following safety protocols and tracking.”*

*“This only works if the government actually does something with the registration such as annual inspections or audits.”*



*“I believe that anyone caring for children should follow the guidelines and regulations set out by the MOE for safety purposes. All child care should be registered.”*

*“I think all unlicensed child cares should or must be licensed. It should be illegal to have children under the care of any person who isn’t registered by the College of ECE or at least approved from child care services licensing to come and check monthly as a regulation.”*

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## **WHAT THIS TELLS US**

The findings of the community survey tell us two important things about an unlicensed child care registry. First, many respondents do not support this proposal and do not think it will increase quality, accessibility, and affordability. Second, the comments of those in support of a registry for unlicensed providers indicate an important caveat: confusion on the accountability and oversight of unlicensed providers. The findings suggest that a registry of unlicensed providers will provide a false sense of security to families and the public that these providers meet similar minimum safety expectations as licensed providers, or that they are inspected and accountable to the Ministry of Education.

Given that we know there already exists confusion about the difference between licensed and unlicensed home child care, we cannot take these alarming findings lightly. For example, one parent who indicated support of a registry of unlicensed child care said, *“I think all unlicensed child cares should or must be licensed. It should be illegal to have children under the care of any person who isn’t registered by the College of ECE or at least approved from child care services licensing to come and check monthly as a regulation.”*

## **CONCLUSION**

The results of the child care community survey demonstrate strong opposition to the proposed regulatory changes, in particular the changes to: age ranges, staff to child ratios and group sizes (Schedule 2); staff qualifications; before- and after-school programs; and an unlicensed child care registry. As one parent shared, the proposed changes are “an insult to educators, children and families”. While the Association of Early Childhood Educators Ontario and the Ontario Coalition for Better Child Care will be submitting consultation responses to the Ministry of Education, we are here recommending that the Ministry listen to the voices of parents and the child care community who have expressed their opposition through this survey, and immediately back down from the proposed changes.