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## Ontario's plan to deregulate child care is a bad movie that parents have seen – and rejected – before a

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## EXCERPTS

Parents, children and the child care sector are facing an extraordinary crisis brought on by the COVID-19 pandemic.

So you might reasonably hope that the Ontario government would use a scheduled five-year review of the Child Care and Early Years Act to directly address these challenges: beef up health, safety and quality measures for young children, ensure and fund smaller group sizes, and make child care more affordable for families.

But you would be wrong.

Sadly, rather than responding to the current child care crisis, the regulatory proposals released by the provincial government earlier in October would weaken child care quality by placing younger children into larger groups with fewer qualified staff.

The 36-page regulatory posting is mostly full of small, dry regulation tweaks (be sure that any pet classroom ferrets have rabies inoculations!). But in amongst the policy weeds lurk three major, and troubling, changes.

1. Group sizes: The government's proposed Schedule 2 would allow child care operators to use alternative age groupings, ratios and group sizes. For example, currently a 24-month-old is in a toddler room with 15 peers and one educator for every 5 children. Under the government's current proposal, that 2-year-old could be placed in a preschool room with 24 children up to age 5 years old and a staff-to-child ratio of 1 to 8.

Similar changes to age groupings, ratios and groups sizes were proposed in 2010, 2014 and 2016—the chart below, from the Childcare Resource and Research Unit, compares the proposals and contrasts them with best practice recommendations.

2. Qualifications: There are several proposals that would water down staffing requirements, including allowing unqualified, short-term supply staff to replace qualified staff and allowing supervisors with no experience in licensed child care settings.

The qualification changes are purportedly aiming to "support workforce retention." Of course, there are many ways to address a skilled workforce shortage in child care.

One of them would be to ensure decent work and wages by bringing in the pay scale that was due to be implemented in April as part of the previous provincial government's Early Years and Child Care Workforce Strategy. It was abandoned by the Ford government.

3. An unlicensed child care registry: The government is currently consulting on this idea, an online list of unlicensed child care. The Ministry posting claims it could "help parents find [unlicensed] child care providers in their communities."

An online registry is perhaps the laziest, cheapest and most disingenuous way for a government to claim they are addressing the child care crisis. Instead of actively working to create enough quality licensed child care spaces for all, a registry would simply put the current grey market of informal child care online with a government stamp of approval—no oversight, no regulation. It's just the Ministry of Education acting as a glorified Kijiji.

An unlicensed child care registry was first proposed in 1981, in the form of a government-sponsored referral network. Trumpeted by the government of the day as an "innovative approach" to the child care shortage, it's much less innovative four decades later to continue reliance on unregulated child care rather than building a quality child care system.

An online registry was also proposed in 2010, with almost exactly the same wording as the current proposal, but was rejected then, too, following public outcry and a series of deaths in unlicensed care.

So, the child care community has seen this movie before. Each time these changes were proposed, they were subsequently abandoned following widespread opposition from parents, educators and researchers. But here they are again, back to the future.

Further consultation on these proposals is clearly unnecessary. Thousands of parents, educators and community members have made

their views felt time and time again. But now—precisely when community strength is at its weakest, when child care directors are struggling just to keep their doors open, when parents are juggling sick days, COVID-19 testing and their jobs—the Ontario government is trying to push through these insidious changes that undermine our children's care.

What makes this all the more frustrating is that it doesn't have to be this way. The recent federal Speech from the Throne promised that the federal government "will make a significant, long-term, sustained investment to create a Canada-wide early learning and childcare system. The Government will build on previous investments, learn from the model that already exists in Quebec, and work with all provinces and territories to ensure that high-quality care is accessible to all."

Rather than scraping the bottom of the barrel for stale policy ideas, and rather than compromising children's wellbeing, the Ontario's Ministry of Education should be focused on how to best and most swiftly collaborate with the federal government to move forward on an accessible, high quality early learning and child care system in Ontario.

The pandemic has shone a light on a care crisis that can no longer be ignored. We need a coherent system of early learning and child care that is affordable for families, provides decent work and wages for educators and meets the needs of all families. It's what our economy needs and what Ontario's children, families and educators deserve.

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