


Proposed changes to child care regulations – Ontario 2020 Submission by the Childcare Resource and Research Unit ^[1]

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Attachment	Size
 ON 2020 CRRU submission re regulatory changes.pdf ^[2]	706.02 KB

Excerpted from background, summary and recommendations

This represents the Childcare Resource and Research Unit’s consultation response to the Ministry of Education’s proposed regulatory changes under the Child Care and Early Years Act, 2014(CCEYA) posted online for consultation 10/2/2020, as per a required five year review.

The Childcare Resource and Research Unit (CRRU) is a non-profit, non-partisan policy research institute with a mandate to work towards an equitable, high quality, publicly funded, inclusive ECEC system for all Canadians. CRRU works with other researchers, NGOs, advocacy groups, government policy makers across multiple levels of government and the early childhood education community Canada-wide.

Thus, CRRU appreciates the opportunity to respond to the proposed regulatory changes. We view our response as consistent with our mandate to “work towards a universal, high quality, publicly funded, inclusive child care system in Canada”. This mandate has remained essentially the same since CRRU’s beginnings at the University of Toronto thirty years ago.

In summary, we do not support the proposed regulatory changes for four reasons:

- a) We argue that the proposed changes are not in the best interests of children or parents, which should be a “given” main goal for the review and Ontario ELCC policy;
- b) We are concerned that the processes of developing the proposals – both development of evidence-based rationales and the consultation process including reporting on it—prior to posting them lack a solid evidence-base as well as transparency about who was consulted and what they said.
- c) We are also concerned about the limitations of the province’s review process more broadly, specifically that it did not address existing structural issues in the child care system, particularly those related to affordability, supply and distribution of services, and the workforce, which remain unaddressed by the proposals and thus the five year review.
- d) Finally, we believe that the review comes at very much the wrong time. First, the timing and potential impact of the changes at a time that the child care community has been so affected by coping with the severe and shifting effects of the pandemic is most unfair; the child care community needs the provincial government’s support to continue to do our best to support families’ and children’s needs during this seismic public health crisis rather than being undermined. Secondly, introducing these negative measure to cut costs just at the time that the federal government has committed to “make a significant, long-term, sustained investment to create a Canada-wide early learning and child care system” will put Ontario—long a leader in Canadian early learning and child care – very much on the wrong side of history.

Thus, the Childcare Resource and Research Unit suggests that the Ontario government withdraw the proposed regulatory changes, returning to the drawing board until full justice can be done to conduct a “beyond COVID-19” review of the Act and Regulations. This should be done in the context of a post-pandemic Ontario; in the context of federal-provincial collaboration in moving towards a child care system that better meets children’s, families and Ontario’s needs; and that more appropriately recognizes a very significant, wide-spread learning from pandemic: **reliable, affordable, quality child care is central to our economy. Without operationalizing this recognition, Ontario, and the rest of Canada, will be hampered in achieving the full recovery we all desire.**

Region: Canada ^[3]

Tags: legislation and regulation ^[4]

Source URL (modified on 2 Dec 2020): <https://childcarecanada.org/documents/research-policy-practice/20/12/proposed-changes-child-care-regulations-%E2%80%93-ontario-2020>

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