

# OCBCC response to regulatory registry posting related to the Child Care and Early Years Act, 2014 and the Education Act: Phase 2 regulations. <sup>[1]</sup>

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## AVAILABILITY

Full response PDF <sup>[2]</sup>

### Introduction and general comments

In response to the Regulatory Posting of February 1, 2016, the Ontario Coalition for Better Child Care began a process to inform, consult and engage our members on all the proposals contained in the posting. Our members and the broader early childhood community have been eager to discuss these proposals with us, and on several proposals we have widespread consensus as to our response. On other proposals there is a range of perspectives. In this response we will limit ourselves to those areas in which we have broad consensus and those of deepest concern to the community. The areas that this response focuses on are: age groupings, ratios, maximum group size; authorized recreation and skill building programs, BASP; tiered licensing - term of a license; and home visitors.

We have urged all members and supporters to send feedback into the Ministry directly to help ensure a rich and thorough community response. We have also appended a copy of our Open Letter to Premier Kathleen Wynne that has been endorsed by thousands of concerned Ontarians - organizations, child care service providers, sector leaders, academics, educators and parents. The OCBCC and our partners will be compiling the feedback that we have received into a What We Heard-style report that we will be releasing publicly. We challenge the government to take a similarly transparent approach to these consultations.

Before delving into each of the proposal areas, we would like to address a broader issue. We were privileged to take part in the government's consultations on child care regulations. Many in the child care community count on us to be their voice during such processes and we do our utmost to represent their perspectives through our enthusiastic involvement. However, we are dismayed with the limitations of this consultation process. Many of the current regulation proposals, especially those around age ranges, ratios and group sizes hold little connection to what was communicated during these sessions, not only by us, but by many of our colleagues.

Moreover, following the last proposed changes to ratios and group sizes (in 2014), there were public assurances from the government, even by the Premier herself, that proposals to weaken ratios and group sizes for our youngest children would be set aside – that the community concern had been heard. To find ourselves, just two years later, once again forced to defend quality child care does not feel like consultation at all. The time and effort spent by countless ECEs, centre Directors and parents to gather community responses and to communicate their heartfelt concerns is experienced by many to be a frustrating process when instead we should be working together to build and strengthen child care in Ontario.

We urge the government to undertake a broader and more transparent policy process. The challenges, such as accessibility, that the Ministry is attempting to address in this proposal through regulation alone cannot be divorced from issues of funding, system building, workforce development and planning. We reiterate our call for a comprehensive policy process with the explicit goal of developing, over time, a quality, universal early childhood education and care system. There is no better time to begin this work.

See also:

Compass Early Learning and Care response to Phase 2 regulatory proposal <sup>[3]</sup>

Compass Early Learning and Care, 1 Apr 2016

Response re: Phase 2 regulations under the Child Care Early Years Act, 2014 <sup>[4]</sup>

Association of Early Childhood Educators Ontario, 1 Apr 2016

**Region:** Ontario <sup>[5]</sup>

**Tags:** quality <sup>[6]</sup>

legislation and regulation <sup>[7]</sup>

infant/toddler <sup>[8]</sup>

ratios <sup>[9]</sup>

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