



Child Day Care Act Consultation Report

Child Day Care Act Review



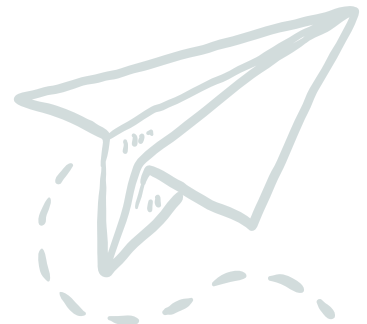


Table of Contents

1. Introduction	1
2. Methodology	3
3. Summary of Engagements	5
4. Key Recommended Changes	30
5. Additional Feedback from Engagements	35
Appendix A: Engagement Questions	39

Acronym List

Child Day Care Act	<i>Act</i>
Cardiopulmonary resuscitation	CPR
District Education Authority	DEA
Early Childhood Education	ECE
Early Learning and Child Care	ELCC
Government of Nunavut	GN
Inuit Qaujimagatuqangit	IQ
Nunavut Arctic College	NAC
Professional Development	PD
Tuberculosis	TB



1. Introduction

1.1 Background

The *Child Day Care Act* sets the standards for child care centres in Nunavut. Minimum standards outlined in the Act include licensing and operator requirements, appeals processes, and investigations. The Act, which was inherited from the Northwest Territories, has not been updated since 1988.

New legislation is needed that reflects Nunavut's vision of early learning and child care (ELCC) programs and services that build on Inuit land, culture and languages to ensure that the ELCC sector meets the needs of Nunavummiut.

The Government of Nunavut (GN) is developing new Nunavut-made legislation for ELCC. This legislation will focus on enhancing the quality, inclusivity, and accessibility of child care programs and services, as well as promoting the overall school readiness and well-being of children. The new legislation will be grounded in Inuit Qaujimajatuqangit (IQ) and align with the Inuit Language Protection Act to promote early childhood Inuit Language development and learning.

To inform the development of this legislation, public consultations were held across the territory to engage Nunavummiut and seek input and feedback on the proposed legislation.



1.2 Summary of Proposed Legislative Changes

The new ELCC statute will improve and expand upon the powers and duties in the existing *Child Day Care Act*. Proposed improvements will focus on the themes outlined below.

For each theme, the Department of Education is considering a number of proposed changes. The full list of changes is presented below, and with further details provided in Section 3.

Inuit-centred early learning and child care programs and services

- Foundational principles to guide ELCC programs and services
- Duty for Minister of Education to promote early childhood Inuit language learning

Accessible, affordable, inclusive, and quality early learning and child care

- New standards to guide learning in child care programs
- The establishment of an early learning and child care council
- Streamlined licensing process for child care centres
- Standards for funding support to centres
- Permit children over the age of 12 to attend after school child care programs

Accountability

- Broad powers to conduct investigations of centres suspected of operating unlicensed centres
- Operators collecting information related to administration
- Sharing anonymous data with funding organizations

Safety and well-being of children

- Criminal record and vulnerable sector checks
- Tuberculosis (TB) Testing
- Minimum standards for recreational day camps
- Authority to exempt centres from specific requirements in the Act

1.3 Structure

The structure of this report is as follows:

- Introduction (this section)
- Methodology
- Summary of Engagements
- Key Recommended Changes
- Additional Feedback from Engagements
- Appendix A - Public Survey Questions



2. Methodology

To gather feedback on the proposed legislative changes to the Child Day Care Act, the GN’s Department of Education conducted a series of engagement sessions. This included an in-person meeting with licensed child care operators where a PowerPoint presentation on the proposed legislative changes was shared. Meeting participants were asked to provide feedback on each of the legislative changes.

In addition, the Department of Education also held in-person engagement sessions with day cares and public consultations in 14 communities, as summarized in Table 1.

Table 1: In-person engagement sessions with day cares and public consultations by community

Community	Number of Engagement Sessions	Date
Arviat	4	15-April-2024
Baker Lake	3	18-April-2024
Cambridge Bay	3	7-May-2024
Chesterfield Inlet	1	19-April-2024
Coral Harbour	3	16-April-2024
Gjoa Haven	3	3-June-2024
Igloolik	4	4-June-2024
Iqaluit	3	23-Feb-2024 23-May-2024 27-May-2024
Kimmirut	3	10-June-2024
Kugluktuk	2	6-May-2024
Pangnirtung	4	30-May-2024
Pond Inlet	5	1-May-2024
Rankin Inlet	1	17-April-2024
Sanikiluaq	3	21-May-2024

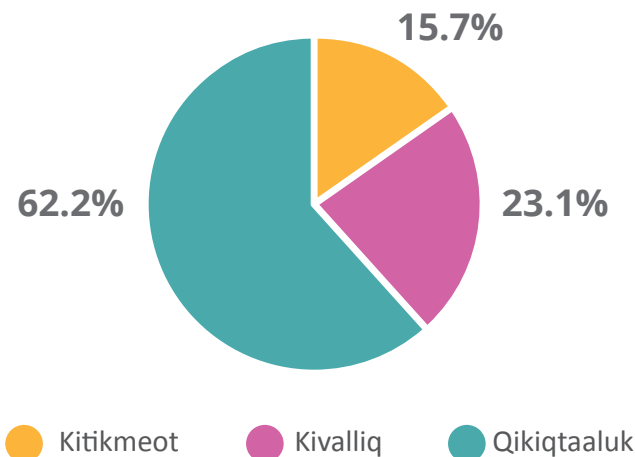


During these public consultations, a PowerPoint presentation was shared and an open discussion followed for participants to provide feedback on the proposed legislative changes. Community consultation sessions were recorded and Department staff took notes to ensure that all feedback was captured.

The Department also released an online survey with questions on the proposed legislative changes for the public to provide feedback (see [Appendix A](#) for the survey questions). Of the 205 respondents, 199 respondents consented to having their input shared and used in this report. Survey respondents did not answer every question in the survey. In this report, the number of respondents that responded to each particular question is indicated.

As shown in Figure 1, survey respondents were primarily from the Qikiqtaaluk Region.

Figure 1: What region do you live in? (n=134)



To ensure Inuit organizations also had an opportunity to provide feedback, the Department invited Nunavut Tunngavik Incorporated, Qikiqtani Inuit Association, Kakivak Association, Kivalliq Inuit Association and Kitikmeot Inuit Association to attend consultations.

Notes and recordings from public consultations and stakeholder meetings were compiled by community and organized by each proposed legislative change into a Community Engagement Summary. These Community Engagement Summaries were shared back with communities to validate the feedback collected. Feedback collected during these meetings was thematically analyzed along with the feedback collected from Inuit organizations, licensed child care operators, and survey respondents. Additionally, the public survey questions were analyzed quantitatively to estimate public support for each proposed legislative change.

Limitations

The results of the stakeholder engagements are limited by the following:

- Because the community consultations were structured as open discussions, and participants were not asked specific questions on proposed changes, the feedback differed from the survey responses. This is reflected throughout Section 3, as engagement participants often did not explicitly express support or opposition to proposed legislated changes.
- The number of participants who agreed with feedback provided is not captured. For example, if a comment was made during an engagement session, the notes did not outline the number of session participants who were in agreement with a comment. As such, the Department is unable to speak to frequency of feedback shared during in-person sessions.

3. Summary of Engagements

This section of the report summarizes the feedback and input that was shared by partners and stakeholders throughout the engagement period. This includes feedback gathered from the in-person stakeholder meeting with licensed child care operators, in-person engagement sessions with day cares, public consultations, engagement sessions with Inuit organizations, as well as public input gathered from the online survey. Feedback from Inuit organizations is presented separately below to differentiate Inuit perspectives on the proposed legislative changes.

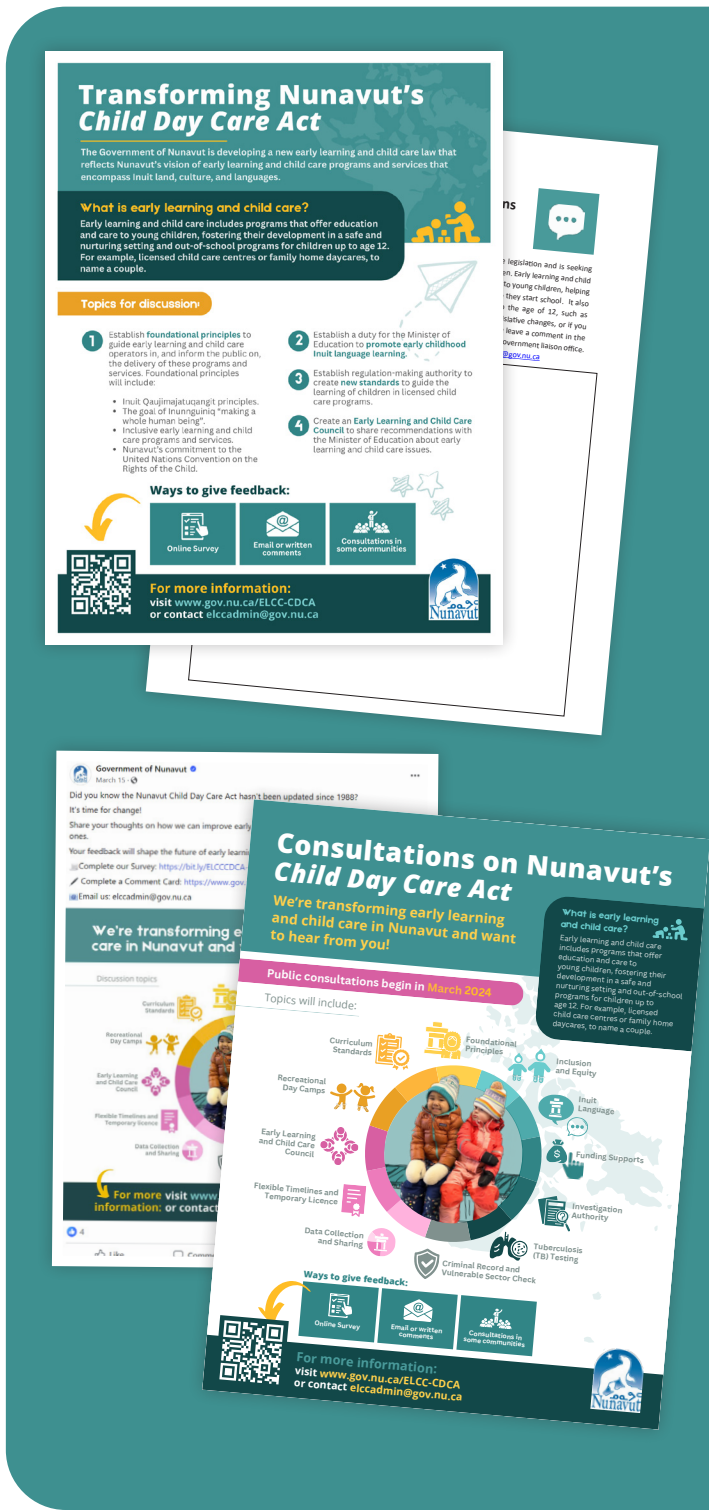
The following sections are organized by theme according to proposed legislative changes to the Child Day Care Act. An explanation of the proposed legislative change is presented, followed by feedback from different participant groups on their support or opposition to the proposed legislative change, and perspectives on implementation considerations.

3.1 Inuit Centred ELCC Programs and Services

As part of the proposed legislative changes that relate to Inuit-centred ELCC programs and services, the Department of Education is proposing to introduce the following changes:

- Foundational principles to guide ELCC programs and services
- Duty for Minister of Education to promote early childhood Inuit language

What we heard from stakeholders in response to the two proposed changes is outlined below.



3.1.1 Foundational principles to guide ELCC programs and services

The Department of Education is proposing to establish foundational principles to guide the delivery of ELCC programs and services. These principles will include:

- The Inuit Qaujimajatuqangit (IQ) principles.
- The goal of Inunnguiniq “making a whole human being.”
- Nunavut as Inuit homeland.
- Inclusive ELCC programs and services.
- Nunavut’s commitment to the United Nations Convention on the Rights of the Child.

These changes are important to ensure that ELCC programs and services are built upon Inuit culture. These principles have been identified to support Inuit culture and guide ELCC operators in the development and delivery of their programs.

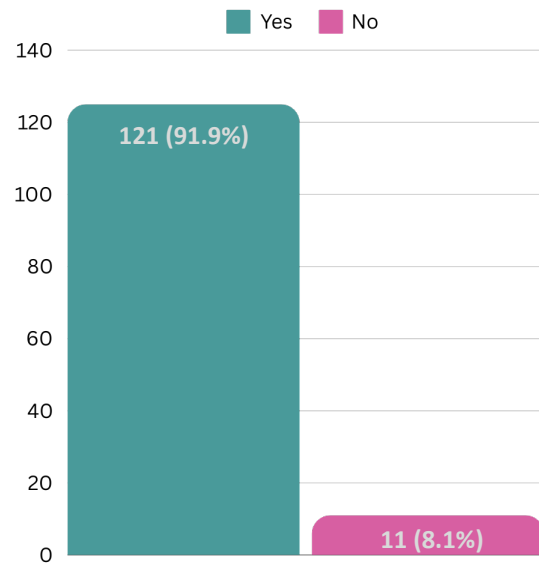


What We Heard

Online Survey Responses

As illustrated in Figure 2 below, of the 136 who responded, the majority (n=125) indicated that they believe the inclusion of foundational principles will support Inuit-centred ELCC in Nunavut. A total of 11 respondents disagreed with this statement.

Figure 2: Do you think the inclusion of these foundational principles will support Inuit-centred ELCC in Nunavut? (n=136)



Of the survey respondents who agreed with the statement, they noted that the foundational principles need to be reflected at the curriculum level and that a greater emphasis should be placed on IQ principles in curriculum. Those who did not agree with the inclusion of the foundational principles felt that it was the role of parents to teach this to their children and that including these foundational principles may make it even more difficult to secure licensed child care within the territory.

Community and Public Engagements

Of the 14 participating communities, 13 provided feedback on the Department of Education’s proposal to establish foundational principles to guide the delivery of ELCC programs and services.

Some community members suggested that IQ terminology should be embedded within the Act. Community members noted that the principles need

to be reflective of the Inuit experience and suggested that the Inuktitut and Inuinnaqtun languages should be used to identify and describe each principle in the Act. It was also suggested that Inuit culture, child-rearing, and disciplinary practices should be a focus of child care centres, and that this focus should be embedded within the Act as a foundational principle.

Inuit Organization Engagements

Two Inuit organizations provided feedback on the proposed legislative change. While the Inuit organizations did not agree or disagree with the proposed change, some implementation considerations were provided (see below).

Key Considerations

Survey Responses

Survey respondents shared that children would benefit from greater access to Inuktitut language resources that they can take home. Additionally, they suggested that Inunnguiniq curricula and resource materials should be made available for educators.

Respondents also pointed to the need to hire more Inuit educators who have cultural competency and safety training. They spoke to the importance of identifying opportunities for ensuring that Inuit educators remain in Nunavut, and reducing the need to hire educators from the south. This could include providing Inuit educators with wage support, as well as training in the IQ principles. Respondents also indicated that the integration of IQ principles could be further improved by involving Elders.

Community and Public Engagements

Similar to survey respondents, community members spoke about prioritizing the hiring of northern Inuit staff. Southern staff should only be recruited if there is no capacity in the community. It was suggested that new southern staff be required to take a workshop on IQ fundamentals specific to education so that they have a better understanding of Inuit educational practices.

It was suggested in almost every community that Elders should be involved throughout the process of developing and implementing the principles. Community members suggested hiring, or at least consulting with, Elders as cultural experts to inform this work. Community members also suggested that Elders should play a



central role in revising the curriculum to place a greater emphasis on the IQ principles. It was also suggested that Elders could help to embed traditional child-rearing practices in the curriculum, and that they be involved in the development of material for all aspects of ELCC.

Community members suggested that in addition to informing the development and implementation of the principles, Elders should also play a role in day-to-day programming but mentioned that it can be difficult to find Elders that want to participate in ELCC centre activities. Having the Elders involved, would benefit children who would be exposed to cultural teachings at a young age, and staff, who would have the opportunity to learn about the IQ principles. Community members suggested that this may also entice more Inuit to sign up for day care, as they would see their culture more closely reflected in the programming.

While acknowledging that Inuit culture should be the primary focus, some community members noted that Nunavut is becoming increasingly multicultural and multilingual, and that this cultural and linguistic diversity should be reflected in the principles and the Act.

Additional suggestions included promoting cultural foods within day cares (i.e., caribou stew), reducing the amount of screentime for children, and offering parenting programs to those who have children in day care.

Inuit Organization Engagements

Participants from Inuit organizations suggested hiring an Elder to assist with, and oversee the implementation and integration of, IQ principles in day care facilities. They also suggested increasing the use of culturally appropriate materials and Inuit cultural activities (e.g., country foods, sewing) in child care centre programming.

3.1.2 Duty for Minister of Education to promote early childhood Inuit language learning

The Department of Education is proposing to establish a duty for the Minister of Education to promote early-childhood Inuit language learning. It is important for ELCC programs to be guided by the goal of revitalizing Inuit languages. Promotion by the Minister will help increase access to Inuit languages.

What We Heard

Online Survey Responses

The survey respondents (n=120) who provided feedback on how the Department of Education could support early childhood Inuit language learning suggested creating a standardized curriculum that ties language to Inuit culture, health, and nutrition.

Community and Public Engagements

Thirteen of the 14 communities provided feedback on establishing a duty for the Minister of Education to promote early childhood Inuit language learning. Community members shared that the Inuktitut language needs to be embedded within the Act from the moment children start attending care outside of the home.

Community members pointed to the need to identify Inuktitut or Inuinnaqtun as the primary language in day care facilities, materials, and curriculum, to help children build a strong language foundation. Some suggested establishing Inuktitut and/or Inuinnaqtun language standards and administering a language proficiency test to staff who interact with children to ensure they meet this standard.

Inuit Organization Engagements

One Inuit organization provided feedback on the proposed legislative change. While the Inuit organization did not agree or disagree with the proposed change, some implementation considerations were provided (see below).

Key Considerations

Online Survey Responses

Respondents suggested that the Department of Education collaborate with Elders and language specialists to develop the curriculum which should include appropriate milestones for each group's language learning and establishing a best-practice approach to language learning. It was also suggested that the curriculum include activities facilitated by Elders such as singing and listening to stories in Inuktitut or Inuinnaqtun.

Respondents also suggested that additional funding is needed to adequately support early childhood Inuit language learning. Day cares and non-profit organizations require consistent, long-term funding to hire more staff, implement existing programs and resources, build and develop new programs and resources, and support early childhood Inuit language learning more generally. Respondents also suggested that wage subsidies should be used to increase the wages of educators who are fluent in Inuktitut or Inuinnaqtun.

Additionally, respondents identified the need for better partnerships with local resource centres, which may be able to assist with the development of culturally relevant, take-home language materials. They indicated that this would further support early-childhood Inuit language learning by allowing children to build on their language skills with their parents at home.

Other suggestions included training education staff in Inuit languages, hiring more Inuk staff to deliver programming in Inuktitut or Inuinnaqtun, and having a less formalized education structure for teaching the IQ principles.

Community and Public Engagements

Community members spoke about the need to identify Inuktitut or Inuinnaqtun as the primary language used in day care facilities, materials, and curriculum. While acknowledging this may not be possible, it was suggested that some type of immersion program should be implemented, or that at least one instructor should always use the appropriate regional dialect of Inuktitut or Inuinnaqtun.

Recognizing that there are not enough day care workers with the requisite fluency in these languages, community members suggested prioritizing the hiring of staff who are fluent in Inuktitut and/or Inuinnaqtun. It was noted that additional support is required for centres to facilitate Inuit activities and hire someone to provide Inuit language programming to children.

In addition, it was suggested that the Department of Education incentivize staff to learn these languages through Nunavut Arctic College (NAC), the Pirurvik Centre, or another Inuit organization. Community members noted that new language tools will not be helpful if staff lack the language capacity to use them effectively. They also commented on the importance of not deterring Elders from participating in ELCC by requiring the completion of language certificates as this may be too onerous.

Community members pointed to the need to account for the appropriate regional dialects of Inuktitut or Inuinnaqtun and to make curriculum and resources available in multiple dialects for children to take resources home to continue learning with their parents. To that end, community members suggested that ELCC develop relationships with local Elders, community organizations, and community members to develop regionally-specific learning materials. Community members indicated that this approach would help to ensure that learning materials reflect the Inuit experience and that regional dialects are appropriately represented.

Inuit Organization Engagements

Participants from Inuit organizations indicated there is a need to increase the accessibility of Inuktitut and/or Inuinnaqtun resources, and that Elders, as cultural experts, should guide the development of these resources.



3.2 Accessible, Affordable, Inclusive, and Quality Early Learning and Child Care

As part of the proposed legislative changes that relate to accessible, affordable, inclusive, and quality ELCC, the Department of Education is proposing to introduce the following changes:

- New standards to guide learning in child care programs
- The establishment of an ELCC council
- Streamlined licensing process for child care centres
- Standards for funding support to centres
- Permitting children over the age of 12 at child care programs

What we heard from stakeholders in response to the five proposed changes is outlined below.

3.2.1 New standards to guide learning in child care programs

The Department of Education is proposing to establish regulation-making authority to create new standards to guide the learning of children in child care programs.

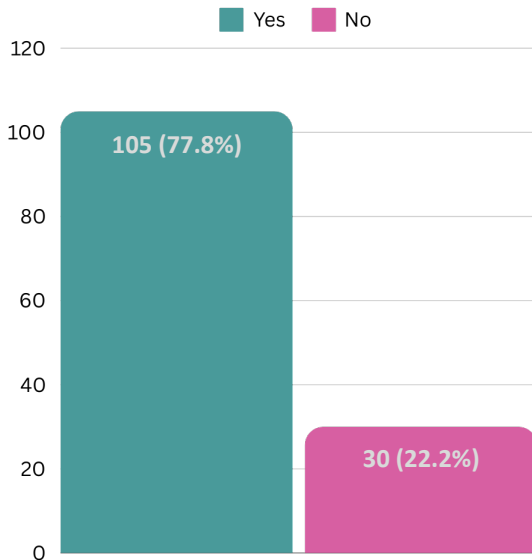
This is important as ELCC programs must create a learning environment that meets the needs of all children. Establishing standards will guide the learning of children to increase the quality of ELCC and readiness for school.

What We Heard

Online Survey Responses

Of the 135 survey respondents who provided feedback on the proposed legislative change, the majority (n=105) agreed that the Department of Education should regulate curriculum and early learning standards for licensed child care, while 30 respondents disagreed (see Figure 3).

Figure 3: Do you think the Department of Education should regulate curriculum and early learning standards for licensed child care? (n=135)



When asked to elaborate on their response, survey respondents indicated that providing minimum standards for curriculum is necessary to ensure consistency in curriculum delivery and in assessing childhood development and milestones. Respondents also noted that standardized curriculum would ensure equitable access to resources and materials and aid in the consistency of service delivery across the territory, as well as facilitate better incorporation of the IQ principles within ELCC learning materials.

Survey respondents who were not in favor of standardizing the curriculum shared that this is a significant undertaking that could be too burdensome for the Department of Education and centres given the current challenges child care is facing. Alternatives provided included the Department creating a curriculum but allowing for flexibility to account for differences in locations and contexts or providing guiding materials instead. Another consideration shared was that children should learn through observations (Pilimmaksarniq) and at their own pace similar to the Montessori's self-directed, hands-on approach as early childhood is a time for discovery through play.

There was also some disagreement between the need to regulate curriculum and standards. Some respondents felt that while regulating the curriculum would be too rigid, regulating the standards would be important to ensure gross motor, fine motor, language and cognitive play activities are included every day.

Community and Public Engagements

Of the thirteen communities (out of 14) that provided feedback, community members largely agreed with the proposed legislative change.

Community members suggested that the new Act should establish standards for new and existing child care facilities to ensure they are safe and well-equipped with toys, games, learning materials, and nutritious foods for staff and children.

They also recommended standardizing the curriculum across the territory so that children have a strong foundation of educational skills and language when they enter kindergarten or grade school, regardless of which community they attended child care in. Standardizing the curriculum would also allow parents who provide child care services at home to access the same materials used in centres.

One member opposed to a standardized curriculum commented that staff were currently struggling with capacity and introducing a rigid curriculum may be too onerous.

Inuit Organization Engagements

Feedback on the proposed legislative change was provided by participants from two Inuit organizations, one of whom remarked that it would be beneficial to standardize the curriculum to guide staff. Some implementation considerations were also provided (see below).

Key Considerations

Online Survey Responses

Survey respondents commented that standardizing the curriculum should include providing an outline on professional development training and qualifications support for current and new ELCC staff. It was also

suggested that standardizing the curriculum could establish expectations and guidelines for continuity regarding health and safety within centres, such as ratios, safety inspections, mandatory fire drills, food safety courses, and cleaning procedures. The importance of including a duty to report within the Act and ensuring buildings are safe was also emphasized.

Community and Public Engagements

Community members suggested that staff should obtain training prior to or during employment to ensure a minimum standard of training across the territory and to increase public confidence in the abilities of centre staff. It was also recommended that one standard be that all staff become First Aid and cardiopulmonary resuscitation (CPR) Level C certified. Suggestions included offering in-person or online Early Childhood Education (ECE) certification programs through NAC or increasing access to community-based training for licensed child care staff, such as through incentives for staff to pursue higher education and specialized training in child development. One community member noted that it would be beneficial for trainers to remain in the community for a short period to provide support and demonstrate the teachings in practice. It was also suggested that, if in-person training is not feasible, ELCC staff should have more access to online certificate programs to complete their training without leaving the community.

It was suggested that the curriculum should integrate Inuit culture, traditions and languages into daily activities. Curriculum materials should be Inuit-specific, focused on play-based learning, and provide children with Inuit tools and cultural resources, such as storytelling, music, arts and crafts that reflect Inuit heritage. However, community members cautioned that the curriculum should not be overly prescriptive and should be flexible enough to accommodate the limited capacity that centres currently experience.

It was also suggested that, if a standardized curriculum is developed, community Elders should be consulted or hired by centres to ensure that the IQ principles are properly incorporated. Providing regular cultural sensitivity and awareness training for all daycare staff was also suggested, as well as encouraging non-Inuit staff to learn about Inuit culture, history, and the current social context.

Additional suggestions included providing training and mentoring to current staff to move into supervisory roles and offering parents a document outlining what their child will be learning throughout the year.

Inuit Organization Engagements

When asked why they felt that the Department of Education should regulate curriculum and early learning standards for licensed child care, Inuit organization participants emphasized the importance of recognizing other cultures as well as Inuit culture, when standardizing the curriculum. One participant noted that Nunavut is becoming increasingly diverse, with more representation of other cultures within communities, and that new standards should reflect this diversity.

Participants also suggested that the new curriculum could be based on developmental milestones. One participant commented on the importance of promoting Inuit staff currently working within centers, rather than hiring staff from the south.



3.2.2 Early learning and child care council

The Department of Education is proposing to create an ELCC Council to share recommendations on ELCC issues with the Minister of Education. Members would include community partners, such as ELCC operators and Inuit organizations.

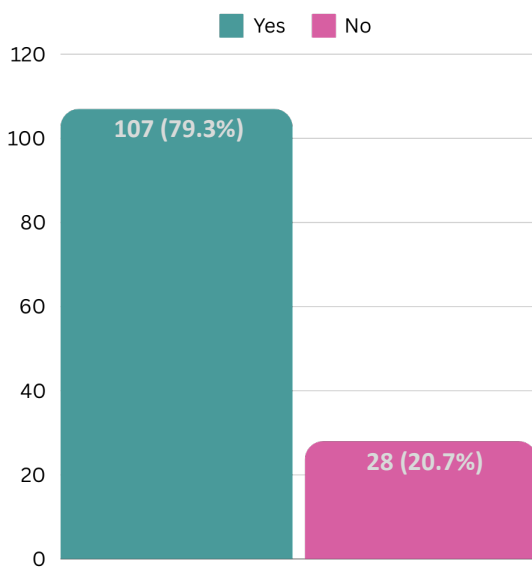
This Council is important as ELCC is a shared responsibility. A Council will ensure that ELCC reflects community input and solutions.

What We Heard

Online Survey Responses

Of the 135 survey respondents who provided feedback, the majority (n=107) agreed that the development of an ELCC council comprised of community partners such as ELCC operators and Inuit organizations, whose role would be to share recommendations on ELCC issues with the Minister of Education, would be beneficial. The remainder of respondents (n=28) indicated that the development of such a Council would not be beneficial (see Figure 4).

Figure 4: Do you think that the development of an ELCC council would be beneficial? (n=135)



When asked to elaborate on their response, survey respondents generally emphasized the importance of working collaboratively when transitioning children from preschool to grade school. They noted that creating a Council could reduce silos within Nunavut’s ELCC sector and help ensure representation from multiple stakeholder groups.

One respondent, who was not in favor of the Council, noted that creating an additional body could overcomplicate matters and add strain to a sector already experiencing capacity issues.

Community and Public Engagements

Nine communities (out of 14) provided feedback on the proposed ELCC Council. Opinions were divided. Community members who supported the Council commented on the importance of including diverse stakeholders, such as community members, Elders, parents, and ELCC staff/board members, to address the current lack of community input in ELCC boards. Additionally, while not related to the ELCC Council per se, some stakeholders encouraged community involvement in daycare activities and events, and fostering partnerships with local organizations, health services (e.g. occupational therapists and speech language pathologists), and educational institutions to create a supportive network for centres.

Those community members opposed to the change noted that the ELCC sector already has numerous boards, councils, and committees, and adding another Council might be redundant.

Inuit Organization Engagements

Inuit organizations did not provide comment on the proposed legislative change.

Key Considerations

Online Survey Responses

When asked to elaborate on their agreement or disagreement with the development of the ELCC Council, one respondent commented that the Council could be beneficial if one of its duties includes providing ELCC centres with access to experts and trained professionals who can offer input and insight into policies that benefit staff on the ground. Additional members could include people with expertise in child development, such as occupational therapists, physiotherapists, speech-

language pathologists and child psychologists. It was also suggested that parents and guardians should be a part of the Council to share recommendations, and that the majority of Council should be Inuit.

Additionally, survey respondents suggested that the Council's role could include discussing outcomes, milestones, and learning opportunities for children within the territory, with the ultimate goal of ensuring consistent delivery and outcomes across Nunavut. They also stated that the Council's role should be clearly defined in the initial months after its roll out.

Lastly, one respondent mentioned that while Inuit organizations should be consulted on the development of the Council, they questioned why these organizations would sit on the committee if they do not have an early learning or education representative.

Community and Public Engagements

Community members provided feedback on the Council's duties and roles. One member remarked that the Council should oversee the application and allocation of funding to ELCC centres, while another suggested the Council could help alleviate administrative burdens on staff. Additional suggested roles and duties included:

- Delegating authority to the Council to visit centres and monitor day-to-day operations.
- Ensuring centres meet their reporting deadlines.
- Collaborating with other GN departments (e.g., the Department of Health) to facilitate additional support and resources within centres (e.g., speech-language pathologists).
- Ensuring the proper implementation of the IQ principles within centres.
- Providing day-to-day guidance for centres and addressing staff questions, reducing the need to consult the Department of Education.

It was also suggested that membership remain consistent over time to ensure continuity in action items and reduce the turnover rate that many ELCC boards currently experience. Regarding the Council's structure, one community member suggested a three-tier system with representation at the community (or multiple communities, depending on size), regional, and territorial levels.

Community members who opposed the development of the ELCC Council noted that there are already too many

boards, councils, and committees, causing people within the ELCC sector to be stretched thin and siloed. This issue could be exacerbated by the creation of another council. One member noted that if a new Council were created, it should not be chaired by the GN but run by community members to ensure flexibility.

3.2.3 Streamlined licensing process for child care centres

The Department of Education is proposing to streamline the licensing process for child care centres by making timelines more flexible and allow for issuing temporary licences when needed.

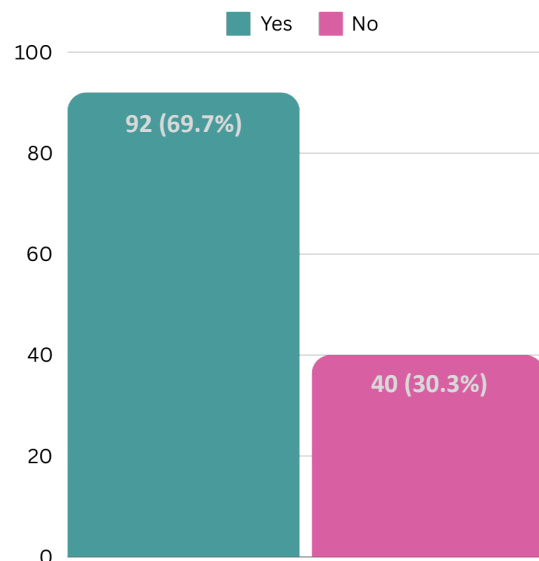
This is important as flexible timelines will avoid the need to resubmit applications when incomplete documents are submitted. In addition, temporary licences will address delays caused by unplanned events.

What We Heard

Online Survey Responses

Of the 132 survey respondents who provided feedback on the proposed legislative change, just over two-thirds (n=92) agreed that the Department of Education should issue temporary licenses, when needed, while 40 respondents disagreed (see Figure 5).

Figure 5: Do you think issuing temporary licences when needed, will help improve the licensing application process? (n=132)



With respect to streamlining the licensing process for child care centres, respondents suggested that it be done as quickly and as safely as possible.

Respondents who opposed granting temporary licenses noted that the inability for GN staff to travel to a community should not justify issuing a temporary license. They also expressed concern that establishing a new licensing process could create additional administrative burdens for GN staff.

Community and Public Engagements

Of the six communities (out of 14) that provided feedback, community members generally supported issuing temporary licenses, as this could help ensure that centres are not delayed in opening when child care is urgently needed. They emphasized that temporary licenses should only be granted under very specific circumstances and should not be granted unless the safety of the building has been investigated and approved.

Inuit Organization Engagements

One Inuit organization expressed support for the proposed legislative changes and shared that allowing flexibility with issuing licenses is important to allow centres to undergo renovations and re-submit documentation before becoming fully licensed.

Key Considerations

Online Survey Responses

Survey respondents indicated that if temporary licenses were granted, significant oversight from the GN would be required to ensure the centres remain safe for children during the interim period between the issuance of the temporary and full licenses.

Community and Public Engagements

Community members stated that licensing flexibility is essential, particularly in the early stages of a centre's operation. The primary objective of the streamlined licensing process should be to ensure centres meet basic requirements while allowing flexibility during the initial setup. It was also suggested that developing a quick guide or fact sheet outlining the necessary steps for licensing would be beneficial.



Community members indicated that simplifying the licensing process is important, as is ensuring collaboration between the Department of Education and centres to make certain they have the required documentation to remain open. Flexible timelines were noted as advantageous, as organizing inspections, such as those by fire or health inspectors, can take time. This flexibility would help prevent delays in opening centres. Community members added that increasing awareness of licensing requirements should ensure that all necessary documents are submitted correctly, preventing further delays.

3.2.4 Standards for funding support to centres

The Department of Education is proposing to establish regulation-making authority for the Minister of Education to create new standards for funding support to licensed ELCC centres.

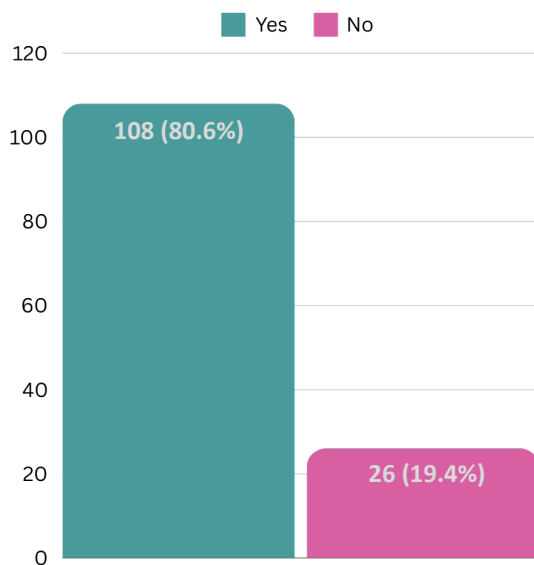
Establishing standards for ELCC funding, such as staff wages and parental fees, will support the affordability and quality of licensed ELCC.

What We Heard

Online Survey Responses

Of the 134 survey respondents the majority (n=108) agreed that the Department of Education should regulate standards for funding support to licensed ELCC centres. Just less than 20% (n=26) disagreed with this proposed change (see Figure 6 below).

Figure 6: Do you think the Department of Education should regulate standards for funding support to licensed ELCC centres? (n=134)



Survey respondents were generally in favor of the proposed change, stating that regulated funding could help ensure accountability with respect to how centres spend their funding (i.e., spending money properly and effectively). It was also mentioned that this could help ensure consistency in costs for parents, centre maintenance, materials, and staffing, as well as reduce reporting burden on centre staff by consolidating all funding into one agreement.

However, respondents who were not in favor of this change noted that, currently, the District Education Authority (DEA) and hamlets are effectively issuing funding, and suggested that the GN should collaborate with them to share information and assist in better addressing funding requirements. Concern was expressed that establishing regulatory authority for new funding standards might stall innovation in the sector.

Community and Public Engagements

Twelve communities (out of 14) provided feedback on the proposal to establish regulation-making authority for the Minister of Education to create new standards for funding support to licensed ELCC centres. Some community members agreed that standards should be established for funding support, while others indicated a proposal-based funding model would be preferable. Many community members commented on local funding needs more generally, without specifically addressing the proposed legislative changes.

Inuit Organization Engagements

One Inuit organization provided feedback on the proposed legislative change. While the Inuit organization did not agree or disagree with the change, some implementation considerations were provided (see below).

Key Considerations

Online Survey Responses

Survey respondents supporting the proposed legislative changes shared that the Department of Education should only develop standards if this results in it being easier for centres to access funding. Respondents suggested that the Department should develop funding criteria based on demonstrated adherence to the applicable standards. It was also suggested that there is a need to balance standards, safety, and the reduction of unnecessary burden of reporting and overly complex standards as well as develop different levels of standards, such as basic and advanced.

Community and Public Engagements

Community members suggested that, to ensure effective utilization of remaining funds, centres should be allowed to allocate leftover funding at the end of the fiscal year to areas such as repairs, nutritious food, and supplies. Despite receiving funding from multiple sources, staff capacity and time constraints often prevent full utilization of these funds. It was suggested that consolidating the numerous funding streams into a single, long-term mechanism would simplify this process and free up time, and that any unused funding should roll over to the next year.

Regarding infrastructure funding, community members emphasized the need for increased support, particularly for facilities over 30 years old that require extensive renovations. It was also suggested that funds should support building maintenance and upgrades, including new day cares in communities.

Community members indicated that enhanced ECE training opportunities and additional courses for current staff, along with wage top-ups for Inuktitut-speaking staff, could help to reduce high turnover rates and attract skilled child care workers. Community members also advocated for less reliance on funding from the DEAs and increased ability to secure external funding, allowing centres to fundraise for necessary equipment or renovations, if required.

It was also suggested that moving towards a proposal-based funding model based on need would allow centres to identify their greatest requirements. One participant suggested that financial support should also extend to after-school programs at French schools for incorporating Inuit traditional practices, while another indicated that home day cares need financial support to cover licensing and insurance fees.

Lastly, it was suggested that reducing barriers to funding for cultural activities and ensuring that day cares remain open during the summer are critical priorities.

Inuit Organization Engagements

One Inuit organization provided the following suggestions for the creation of new funding supports:

- Provide wage top-ups for management and child care staff.
- Increase funding to offer enhanced training or certification upgrades for ELCC centre staff.
- Increase funding for staff training on working with children with enhanced or special needs.

It was also suggested that, in order to support ELCC centres more effectively, the funding allocated to centres needs to support demonstrated increases in staff benefits (e.g., housing) and increases in compensation to attract new hires.





3.2.5 Children over the age of 12 at child care programs

The Department of Education is proposing to permit children over the age of 12 to attend after school child care programs when needed.

This is important as every child has different needs. Some children may need access to licensed child care after the age of 12.

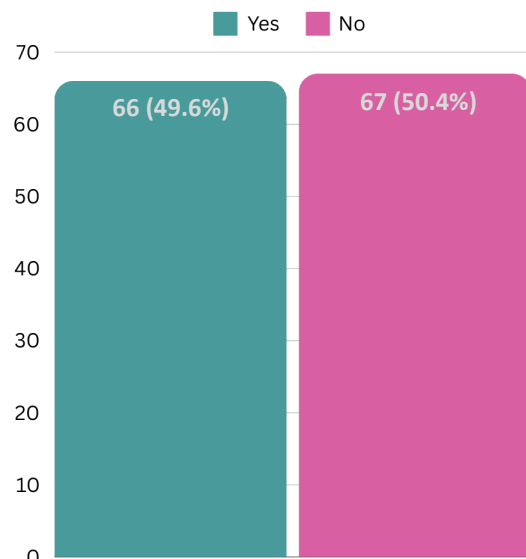
Note: Engagement feedback from those who opposed the change may have understood the proposed revision to mean that children over the age of 12 would be in the same child care programs as younger children. However, the Department of Education is only proposing that these children be permitted to attend after school programs in child care centres, and not attend for the full day with younger children.

What We Heard

Online Survey Responses

Of the 133 survey respondents that provided feedback on the proposed legislative change, approximately half (n=66) agreed that children over the age of 12 should be allowed to attend licensed child care centres when needed, and half (n=67) disagreed (see Figure 7).

Figure 7: Do you think children over the age of 12 should be allowed to attend licensed child care programs when needed? (n=133)



Survey respondents were divided on the proposal to allow children 12 years and older to attend licensed child care programs. Some respondents who agreed with the proposed legislative change stated that all minors should be provided with a safe space and the decision to attend programming should be left to the discretion of the child's parent if they feel their child requires additional support.

Those who disagreed contended that children 12 years and over were old enough to supervise themselves, and that centre staff were not equipped to manage the needs of older children. They also noted that children 12 years and over have access to after-school and recreational opportunities that would be more age-appropriate.

Community and Public Engagements

Five communities (out of 14) provided feedback on allowing children over the age of 12 to attend child care programs when needed, with most community members being largely opposed to the legislative change. They indicated that 12-year-olds are mature enough to supervise themselves at home, and suggested that these children could attend after-school programs if additional care is required. Others commented on the effects of increasing the number of children within centres which would place additional strain on ELCC centres, which are already operating at maximum capacity.

Conversely, one community member supported the change, viewing it as an opportunity for youth to learn new skills and potentially develop an interest in a career in child care. Others offered qualified support for the proposed change by indicating that requests should be evaluated on a case-by-case basis.

Inuit Organizations

Inuit organizations did not comment on the proposed legislative change.



Key Considerations

Online Survey Responses

Survey respondents indicated that this could be presented as an option with local staff having decision-making power on a case-by-case basis (e.g., a safety concern of a 14-year-old being in same space as 3-year-old). Other considerations include creating separate services for children aged 12-17 to address their needs separate from children younger than 12 years. Some respondents spoke to the need for youth programs as there are not currently enough after-school programs available for children 12 years and older.

Community and Public Engagements

One community member proposed that decisions on this matter should be made on a case-by-case basis, considering both the needs of the child and the capacity of the ELCC centre. This approach would ensure that adequate support can be provided without taking space away from a child under 12 years.

Community members also suggested that if children over 12 are to be included, they should be placed in a separate group rather than being mixed with younger children and babies.

3.3 Accountability

As part of the proposed legislative changes that relate to accountability, the Department of Education is proposing to introduce the following changes:

- Broad powers to conduct investigations of centres suspected of operating unlicensed centre
- Operators collecting information related to administration
- Sharing anonymous data with funding organizations

What we heard from stakeholders in response to the three proposed changes is outlined below.

3.3.1 Broad powers to conduct investigations of centres suspected of operating unlicensed centres

The Department of Education is proposing to establish broad powers to conduct investigations of licensed ELCC centres and individuals suspected of operating an unlicensed child care centre. For example, the ability to investigate if a licensed child care centre is not following its board approved policies.

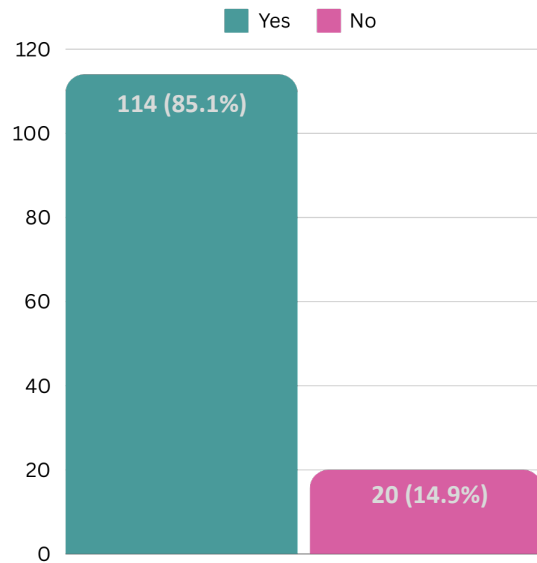
Currently, investigations are only conducted to ensure that child care centres are licensed. However, it is important that a centre be investigated for a variety of other reasons.

What We Heard

Online Survey Responses

Of the 134 survey respondents who provided feedback on the proposed legislative change, the majority (n=114) agreed that the Department of Education should be able to investigate other issues, while 20 respondents disagreed (see Figure 8).

Figure 8: Do you think the department should be able to investigate other issues, such as whether a licensed child care centre is following its board approved policies? (n=134)



Of the survey respondents who agreed with this change, many spoke to the importance of allowing for the Department of Education to investigate complaints (unsafe conditions, abuse, etc.) to ensure the safety of children. Those who disagreed with the proposed change indicated that this is the board’s responsibility and that many non-profits are self governed. It was also suggested that, as child care facilities are understaffed, this could cause additional stress.

Community and Public Engagements

Eight communities (out of 14) provided limited feedback on this legislative change, with two communities explicitly expressing support and one community suggesting there be no limitation on investigations.

Inuit Organization Engagements

Inuit organizations did not comment on the proposed legislative change.

Key Considerations

Online Survey Responses

Survey respondents in favour of the proposed legislative change agreed that it is important to investigate apparent breaches of the regulations, but indicated that the goal should be to ensure compliance and not to punish or shut down day care centres. In addition, it was emphasized that these expanded responsibilities should not take away from other priorities, such as licensing centres. One respondent indicated that day care facilities should be investigated at least twice a year. Some respondents suggested that broad investigative powers should only apply to serious allegations, such as unsafe conditions or harming a child. A comment was also shared that the Department of Education should provide support to ELCC centres to address identified issues.

Respondents opposed to the proposed legislative change indicated that it would be too bureaucratic, placing an additional administrative burden on unlicensed day care facilities and Department of Education staff. One respondent suggested that increased investigations would infringe on the board of director's autonomy to operate.

Community and Public Engagements

Community members suggested that a transparent system for reporting and addressing complaints from staff and parents be implemented with clear accountability measures for non-compliance with the Act. It was also shared that investigations enabled by this legislative change should be solutions oriented rather than simply punitive. When a violation is found, the GN should provide a report that clearly documents the violation and explains how to resolve the matter. It was suggested that day care operators should be informed of their responsibilities and requirements under the new Act, along with a list of the violations that can lead to investigations, so that they understand what is being asked of them.

Another suggestion was that the criteria for investigations should be tailored to the type of day care (i.e., home day care vs. child care centre). One community member suggested that, if an investigation occurs, mediation support should be provided for parents and day care staff, in case disagreements arise concerning the circumstances of the investigation.



Community members also suggested establishing a partnership with other authorities such as the Health and Safety Unit and the fire department to ensure that, if an investigation is raised, the correct people are able to respond and resolve the issue. It was also suggested that a board member should be identified to speak for all day cares in their community, as not all centres have the capacity to send staff to participate.

3.3.2 Operators collecting information related to administration

The Department of Education is proposing to require ELCC operators to collect information related to the administration of their centres and programs. Required information will be set out in the regulations.

It is important that Nunavut has consistent data collection across centres to show the ELCC landscape across the territory.

What We Heard

Online Survey Responses

This topic was not addressed within the online survey.

Community and Public Engagements

Nine communities (out of 14) provided feedback on the Department of Education's proposed change. Communities were divided, with some indicating that day care staff are already overburdened with data collection and administrative tasks, and others supporting the change but suggesting that additional data collection requirements need to be paired with appropriate training and increased funding. Community members also indicated that data collection requirements need to be clearly defined, standardized, and streamlined for each type of day care.

Inuit Organization Engagements

One participating Inuit organization indicated that they disagreed with the proposed change. The organization indicated that existing reporting requirements are too burdensome, and that new reporting requirements should not be considered until the existing reporting requirements are streamlined.



Key Considerations

Online Survey Responses

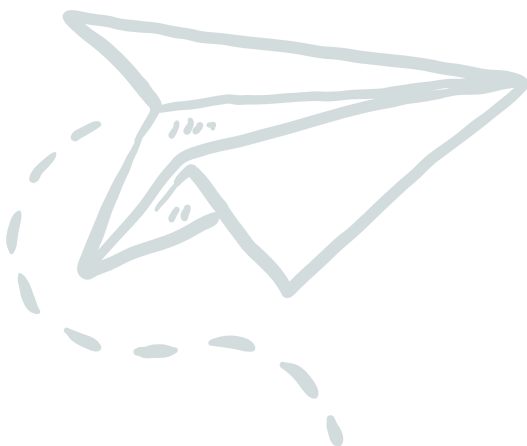
This topic was not addressed within the online survey.

Community and Public Engagements

Several community members suggested that some of the information currently being collected is unnecessary and burdensome. In particular, community members questioned the value of collecting data related to the ethnicity of children. It was also suggested that the same data often needs to be reported to multiple parties, and that this redundancy needs to be addressed. One community member suggested that reporting should happen at the end of each fiscal year.

Community members also indicated that if reporting requirements are going to be increased, day care centres are going to require additional support, funding, and training to meet the new requirements. It was suggested that training will be needed so that staff know what data to collect, how to collect the data, as well as how and to whom it should be reported. One community member indicated that day care centres experiencing staffing or capacity challenges may require additional support to meet the new reporting requirements. Another community member suggested that anonymous data collection and sharing may encourage day care centres to report on information, which may help to hold the GN accountable.

Community members who opposed the proposed legislative change indicated that day care staff are already overburdened with administrative tasks, and suggested that adding to this workload would not be helpful. It was suggested that existing reporting requirements need to be streamlined before adding new requirements.



3.3.3 Sharing anonymous data with funding organizations

The Department of Education is proposing to create the ability for the Minister of Education to share anonymous data with other funding organizations, such as Inuit organizations and the federal government.

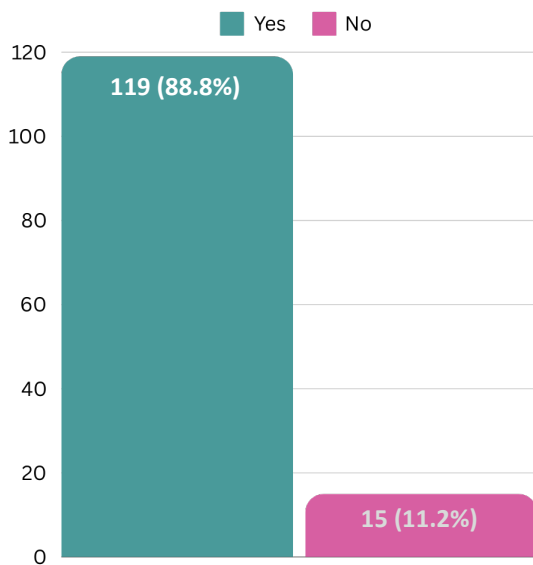
It is important to reduce the amount of reporting for ELCC operators. Allowing the Minister to share anonymous data with other organizations will help reduce the workload of ELCC operators.

What We Heard

Online Survey Responses

Of the 134 survey respondents who provided feedback, the majority (n=119) agreed that reporting would be simplified if the Department of Education was able to share information reported by ELCC centres with other funding organizations, while 15 respondents disagreed (see Figure 9).

Figure 9: Do you think that the reporting would be simplified if the Department of Education was able to share information reported by ELCC centres with other funding organizations? (n=134)



Of the survey respondents that agreed with the proposed change, many spoke of the benefits of simplifying reporting as this would ease the administrative and reporting burden currently being experienced by day care staff, allowing them to focus on core duties.

Community and Public Engagements

Seven of 14 communities provided feedback, with most community members in support of the proposed legislative change with the caveat that the process of anonymizing data be robust and transparent.

Inuit Organization Engagements

One of the Inuit organizations expressed support for the proposed legislative change and agreed that sharing anonymous data would alleviate some administrative burden on centres and may also allow supervisors to make more efficient use of their time.

Key Considerations

Online Survey Responses

Survey respondents indicated that day care staff should have a say in where and with whom their information is shared.

Community and Public Engagements

Community members expressed support for the proposed change provided that it reduces redundancies, paperwork, and the administrative workload of day care staff. Currently, day care centres have to submit the same information to multiple sources, which can prove time consuming. It was suggested that submitting information in a single place, such as an online portal or website where it could then be accessed by the appropriate parties, would represent an improvement over the status quo.

Community members expressed concerns regarding the anonymity of the data being collected. It was suggested that some staff feel the data they share is not anonymous (e.g., pay stubs, timesheets), and indicated that more needs to be done to anonymize information being collected. It was also suggested that it would be helpful if day care centres had the option to examine reports before they are shared so that they understand what information will be shared. Community members also called for the establishment of regulations around protection of information and confidentiality before anything is shared with other organizations.

3.4 Safety and Well-Being of Children

As part of the proposed legislative changes that relate to the safety and well-being of children, the Department of Education is proposing to introduce the following changes:

- Requirements for criminal record and vulnerable sector checks for ELCC centre staff
- Tuberculosis (TB) Testing
- Minimum standards for recreational day camps
- Authority to exempt centres from specific requirements in the Act

What we heard from stakeholders in response to the four proposed changes is outlined below.

3.4.1 Criminal record and vulnerable sector checks

The Department of Education is proposing to require ELCC operators to get completed criminal record and vulnerable sector checks from every employee before they start working.

This is important as ensuring the safety of children is essential. Requiring operators to get these checks from all prospective employees will help protect the health and safety of children.

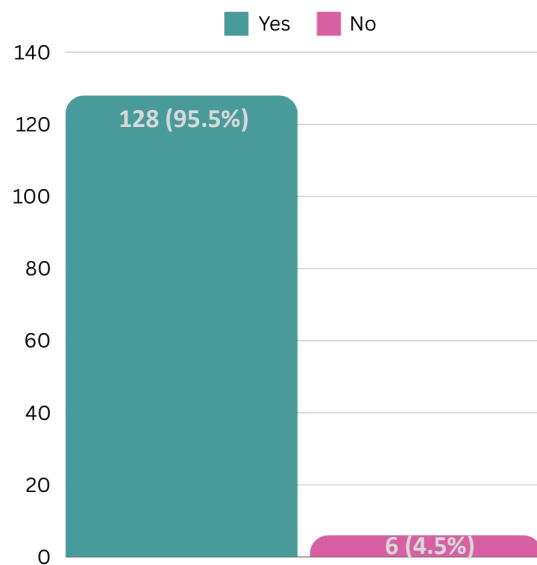


What We Heard

Online Survey Responses

Of the 134 survey respondents who provided feedback, the majority (n=128) agreed that criminal record and vulnerable sector checks should be mandatory for all ELCC staff. Only six respondents disagreed (see Figure 10).

Figure 10: Do you think that criminal record and vulnerable sector checks should be mandatory for all ELCC staff? (n=134)



The majority of survey respondents spoke to the importance of protecting vulnerable children and the need to ensure they are in a safe environment. However, some cautioned that if staff have been convicted of a non-violent crime or incident unrelated to the safety of children, they should not be denied employment.

Community and Public Engagements

Nine of 14 communities provided feedback, with communities being somewhat divided on this issue. While many community members expressed unqualified support for the proposed change, others characterized the process of obtaining criminal record and vulnerable sector checks as burdensome and suggested that this could have a negative impact on staffing capacity and Elder participation. Some indicated that a flexible approach would be needed as not all crimes should disqualify individuals from working with children.

Inuit Organization Engagements

Inuit organizations did not provide any feedback regarding the proposed legislative change.

Key Considerations

Online Survey Responses

Survey respondents indicated that discretion should be exercised for those who have been previously convicted of non-violent crimes that did not involve children. Another comment was that criminal record checks should be completed periodically, such as every six months.

Community and Public Engagements

Community members indicated that many day care centres already conduct criminal record and vulnerable sector checks. However, there was no consensus among community members concerning how often criminal record and vulnerable sector checks should be required. At one end of the spectrum, community members, citing the vulnerability of the children, suggested that checks should be required every six months. Other suggestions included every year, every two years, and every five years.

Some community members pointed to the need for flexibility and discretion in determining what criminal offenses should be considered unacceptable for child care employees. It was suggested that, although those with violent criminal histories should not be permitted to work with children, those who have been convicted for lesser, non-violent crimes should be evaluated on a case-by-case basis. Additionally, it was noted that, if all crimes are treated equally, some Elders may be unable to contribute to day care programming, depriving the children of important teachings.

Community members also noted that the process of completing criminal record and vulnerable sector checks can be burdensome for some, especially Elders. For this reason, it was suggested that, if Elders are to be subject to the same requirements as day care employees, steps should be taken to support Elders with this process. Additionally, it was noted that criminal record and vulnerable sector checks may disrupt service delivery if staff are unable to work while the check is being processed.

3.4.2 TB Testing

The Department of Education is proposing to require ELCC operators to collect TB test results from all employees before they begin working in childcare settings.

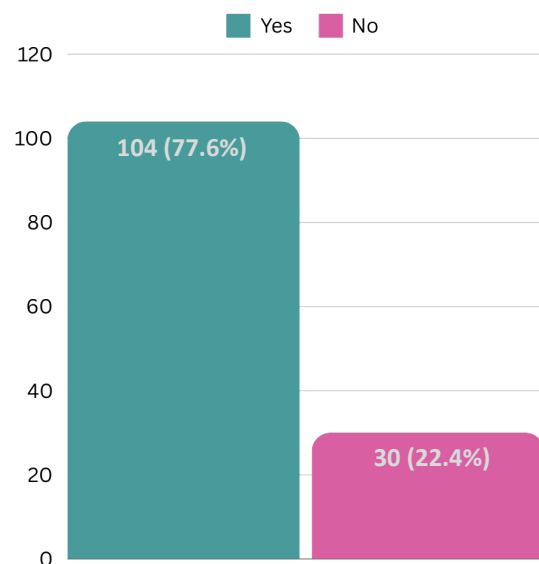
As the TB rate in Nunavut is much higher than the rest of Canada, Nunavut children are at risk of TB. It is important to protect the health and well-being of children. The Chief Public Health Officer's report on Eliminating Tuberculosis in Canada highlighted that TB rates are almost 300 times higher among Inuit compared to the non-Indigenous Canadian born population and that children under the age of 5 are at greater risk.

What We Heard

Online Survey Responses

Of the 134 survey respondents who provided feedback, just over three-quarters (n=104) supported the proposal to require ELCC operators to get employee results of TB tests before working with children for prolonged periods of time. A total of 30 respondents disagreed with this proposal (see Figure 11).

Figure 11: Do you think TB testing should be mandatory for all ELCC staff before they start working with children for prolonged periods of time? (n=134)



Of the survey respondents that agreed with this proposed legislative change, many spoke to the importance of protecting the health of children, particularly given the high rates of TB in Nunavut. Those who opposed the proposed change spoke to capacity issues of centres and this additional requirement causing a delay to employment.

Community and Public Engagements

Of the 12 communities (out of 14) that provided feedback on the proposed legislative change, communities largely agreed with the proposed change and indicated that many ELCC centres already have mandatory TB testing. They also noted that this requirement would not only protect the health and safety of the children, but the staff as well.

A number of participants identified challenges such as limited capacity at health centres that would make mandatory testing difficult or costly in some communities. Some indicated that while they support mandatory testing in principle, the following exceptions should be considered: the onus for testing should not be placed solely on staff; those with latent TB should not be punished by being unable to work; and that testing requirements should not apply to Elders.

Inuit Organization Engagements

This proposed legislative change was originally proposed by an Inuit organization. During the engagements, one Inuit organization expressed support for the proposed legislative change and noted that TB testing protects both the children and the staff.

Key Considerations

Online Survey Responses

Survey respondents indicated that mandatory TB testing can prevent a TB outbreak, with some indicating that testing should extend to other contagious diseases. Others suggested that testing should only target active TB infections. Survey respondents who were not in favour shared that TB testing is a good idea but questioned if it was required before workers start employment.

Community and Public Engagements

Community members suggested that no staff or child should be able to enter a facility if they are actively sick. It was also suggested that testing should not be limited to TB, and that centres should also be able to consider testing for other communicable diseases that could affect children.

Community members offered suggestions for how best to facilitate testing, with some indicating that it would be easier if testing was completed in collaboration with the Department of Health and was available in smaller communities or in the ELCC centres. Community members suggested that employees can get a TB test completed when they go to the health centre to have their 'suitable for work' form completed. It was also suggested that testing should be completed regularly but indicated that annual testing would be too onerous.

Community members also identified challenges associated with mandatory TB testing. In some communities, the local health centre is only taking emergency cases or may otherwise be closed or lacking in capacity, which would make it difficult to facilitate mandatory testing. In such cases, this might cause delays in hiring. For this reason, some suggested creating a testing schedule with the health centre. Others suggested having the health centre staff come to the day care for testing so that day care staff do not need to take time off work for testing. It was also suggested that TB testing should be recommended but not mandatory for smaller communities with health centres that have capacity issues.

In line with the above, community members called for flexibility or latitude regarding mandatory TB testing. It was suggested that positive TB tests should be investigated further, as many Nunavummiut have latent TB, which is not contagious but shows up as positive on a test. It was also suggested that staff who refuse the test or test positive should be put to work in a non-child-facing position so that they are not denied employment and pose no risk to the children. Additionally, community members indicated that it may be problematic to require TB testing for Elders, who may feel uncomfortable going to health centres.

Additional remarks offered by community members included that children could transmit TB within centres just as easily as adults but testing should not be required for children; this should be left up to the parents.

3.4.3 Minimum standards for recreational day camps

The Department of Education is proposing to establish minimum standards for recreational day camps offered by hamlets and non-profit organizations.

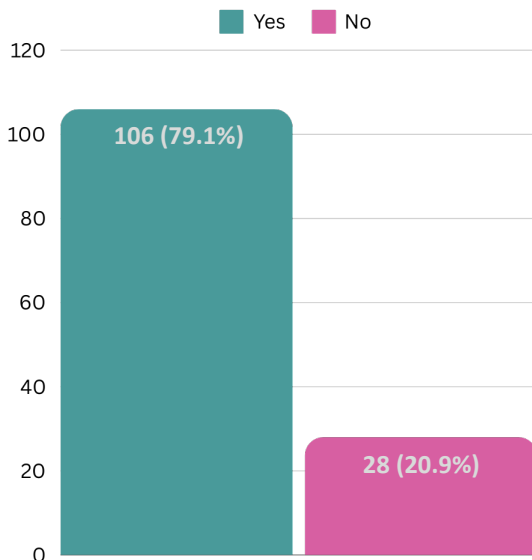
It is important to promote safe environments in recreational day camps. By implementing minimum standards for these programs, such as the age and qualification of staff, the health and safety of children will be promoted.

What We Heard

Online Survey Responses

Of the 134 survey respondents who provided feedback, the majority (n=106) indicated that they are supportive of the proposal to establish minimum standards for recreational day camps, while 28 respondents disagreed (see Figure 12).

Figure 12: Do you think recreational day camps should be regulated under the Act by some minimum standards, such as the age and qualification of staff and maximum number of children each staff member can be responsible for? (n=134)



Of the respondents who agreed with this proposed legislative change, many spoke to the importance of having safety and quality upheld through minimum standards. Some respondents indicated that some oversight is needed but suggested that these minimum standards should not be as restrictive as those that apply to day care centres. Others suggested that minimum standards should be established for Iqaluit but indicated that standards may not be necessary in smaller communities.

Survey respondents who disagreed with the proposed legislative change suggested that the establishment of minimum standards would make the recreational day camps so restrictive that they may never be able to run in some communities. It was also suggested that, as child care needs vary from community to community and recreational day camps are established in response to those needs, these programs should be regulated according to the policies and procedures of each hamlet. From this perspective, strict minimum standards may discourage organizations from operating summer camps, potentially leaving more children without care during school breaks.

Community and Public Engagements

Of the 12 communities (out of 14) that provided feedback, communities expressed support for the proposed legislative change. They indicated that minimum standards would help to ensure that children are receiving continuity of care, and that additional structure and guidelines would better safeguard the health and safety of participating children. It was suggested that minimum standards would make it easier for community organizations to open programs, and that this would create more space for children during the summer months.

Some community members expressed concern about the impact these standards might have on underfunded day camps in small communities. Some comments included that minimum requirements should be established for camps for safety reasons but should not extend to other activities, such as sports.

Inuit Organization Engagements

Two Inuit organizations were supportive of the proposed legislative change. Some implementation considerations were also provided (see below).

Key Considerations

Online Survey Responses

Survey respondents indicated that camp staff need better training to provide better quality of care, and suggested that First Aid and CPR certifications should be minimum standards. Respondents also spoke to ratios which ensure an appropriate number of staff are available for the number of children in the day camps.

Community and Public Engagements

Community members also offered a variety of suggestions concerning the specific standards that should be established. Many suggested that camp staff should be certified in First Aid and/or CPR, and that courses should be offered to summer staff annually for this purpose. Additionally, some suggested that camp staff should be required to complete an online training or babysitting course. They also suggested that appropriate staff-to-children ratios need to be developed and monitored and indicated that this requirement can be lower than a day care because the children involved are likely older. Some indicated that ratios would also help camps to forecast how many staff will need to be hired for the summer.

Community members suggested specific requirements that should apply to camp staff, with some indicating there should be a minimum age requirement for camp staff, with the minimum age suggestions ranging from 18 to 19 years old, and others simply stating that staff need to be mature enough for the role. Others suggested that those who do not meet the age requirements should be supervised by an adult.

Community members also identified opportunities to leverage the new standards to maximize child care capacity. For example, some hamlets do not have a location from which to operate a day camp as unlicensed child care programs are not permitted to operate on school property. Accordingly, community members

suggested that day camps be permitted to use school facilities once appropriate standards are established and when school is not in session. It was also suggested that camps should coordinate with ELCC centres during the months when child care is most needed to provide additional spaces for children who may be on the centre waitlist, ensuring that a greater number of children are receiving care during the summer. Others suggested that day camps could be encouraged to operate during professional development (PD) days, which would be helpful because many parents still work but must find alternate arrangements for children who are not eligible for day care.

Some community members noted that additional funding may be required to help existing day camps meet the new minimum standards. Additionally, some hamlets do not currently have afterschool programs for children and would require increased funding to establish and support such programs.

Conversely, it was noted that new regulations and requirements for camps would be too onerous for the community organizations running the camps, and that this could lead to jobs being taken away from students, rather than promoting youth employment.

Inuit Organization Engagements

Participants from Inuit organizations indicated that students should receive training if they are to work at a recreational day camp. It was also suggested that camp staff should be required to take a babysitting and/or First Aid course.



3.4.4 Authority to exempt centres from specific requirements in the Act

The Department of Education is proposing to permit the Minister of Education to delegate the authority to exempt ELCC centres from specific requirements in the Act.

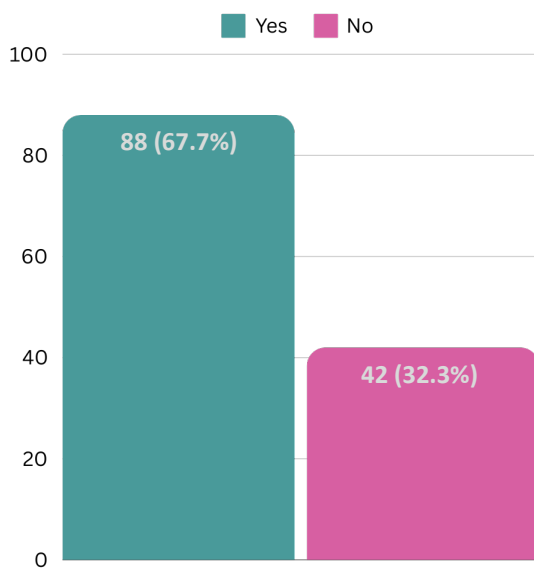
Currently, only the Minister has the power to exempt ELCC centres from requirements in the Act. It is important to support the efficient operation of the new Act, which can be achieved by allowing the Minister to delegate this authority.

What We Heard

Online Survey Responses

Of the 130 survey respondents who provided feedback on the proposed legislative change, two-thirds (n=88) agreed that the Minister should be able to delegate authority when needed, while one-third (n=42) disagreed (see Figure 13).

Figure 13: Do you think the Minister should be able to delegate this authority when needed? (n=130)



Survey respondents who agreed with the proposed legislative change spoke to the importance of reducing bureaucratic delays and focusing the Minister’s attention on other matters. Those who disagreed with the proposed legislative change thought that exemptions should not be permitted.

Community and Public Engagements

Two of 14 communities provided feedback on the Department of Education’s proposed change. Community members were divided on the proposed legislative change, with one participant supporting it, one opposing it, and one indicating that they believe the Minister should only be able to delegate authority to ECE officers.

Inuit Organization Engagements

Inuit organizations did not provide any feedback regarding the proposed legislative change.

Key Considerations

Online Survey Responses

Many survey respondents suggested that the Minister should be permitted to delegate the authority to grant exemptions to the Deputy Minister, Assistant Deputy Ministers, or Directors. Others indicated that this should only be permitted in relation to particular issues, such as matters related to official languages. Some respondents indicated that the Minister or a committee should be required to review any exemptions made under delegated authority.

Community and Public Engagements

Some community members indicated that the Minister should be able to delegate authority in response to a specific health and safety concern that has been raised. Some suggested that the Minister should only be able to delegate authority to ECE officers. Others suggested that the Minister should not be permitted to grant any exemptions.

3.5 Other

The following section offers an overview of additional feedback related to ELCC in Nunavut, addressing various aspects not directly covered by the four main themes discussed earlier. These themes emerged from the online survey, community and public engagement, and engagements with Inuit organizations.

Funding and Resources

Respondents emphasized the need for funding and resources to support various programs, such as mandatory lunch programs, hiring more staff to improve child-to-staff ratios, and flexible operating dollars for centres. Additionally, funding was requested for cleaning staff and the development of afterschool programs. It was also suggested to set up retirement saving plans for staff and that better wages and housing incentives would attract qualified Early Childhood Educators.

Staffing and Training

A significant focus was placed on hiring more diverse staff and providing onboarding and manager training, opportunities to shadow programs and participate in mentoring programs for new staff. There were suggestions to clearly define the age requirements of ELCC centre staff, with some respondents suggesting that age requirements be set to a minimum age of 18 years of age. Respondents also commented that staff should be offered training to work with children with trauma and behavioural issues and be provided with resources to support children's mental health and well-being.

Program Development and Expansion

The need for additional day care and afterschool programs was emphasized, along with the development of family day care programs in public housing. There were also suggestions for integrating day cares within existing schools to utilize existing infrastructure. Communities also proposed establishing day care programs in high schools to meet the needs of young parents who are still in school. It was also suggested that steps need to be taken to align early learning and kindergarten curricula, and integrate ELCC centres into the school system. Implementing a program similar to Ontario's Early Years, promoting socialization among children and teaching parenting skills were also recommended. Another suggestion was to develop programs that teach children coping, emotional regulation, and social interaction skills. It was also mentioned that more support could be provided for non-Inuit children in securing day care spots.



Governance and Administration

The feedback highlighted the need for clearer governance and administrative processes, such as clarifying day care responsibilities, streamlining the insurance process for home day cares, and promoting the benefits of becoming a licensed child care centre. There were also suggestions to have government oversight for day care waitlists, to publicize the number of children on waitlists, and to develop long-term recruitment and retention strategies for Inuit/Inuktitut speaking staff. Another suggestion was to encourage daycares to establish regular communication channels with parents using social media or digital platforms to share information about the daycare's activities and what children are learning.

Health and Safety

Ensuring regular health check-ups for children at day cares, allowing public health nurses to sign medical sheets, and addressing mold in day care facilities were identified as important health and safety measures.

Inclusivity and Accessibility

Communities stressed the importance of making day care more inclusive and accessible by promoting day care spots when they become available, providing training to staff on working with children with special needs, and allowing for more flexible age requirements in home day cares.

4. Key Recommended Changes

This section outlines the key recommended changes based on the engagement findings. The first column in Table 2 below outlines the initial proposed legislative change that engagements were structured around. The second column provides a summary of the engagement findings and the third column outlines the updated legislative changes as a result of the engagement findings.

Table 2: Summary of engagement findings and updated legislative changes

Inuit Centred ELCC programs and services

Initial Proposed Legislative Change Discussion Topic	Summary: What We Heard	Updated Proposed Legislative Change
Establish foundational principles to guide the delivery of ELCC programs and services	<ul style="list-style-type: none"> • Foundational principles need to be reflected in curriculum. • The foundational principles need to emphasize the IQ principles and reflect Inuit culture, child-rearing, and disciplinary practices, which should be embedded within the Act as foundational principles. • Each principle should be described in Inuktitut and Inuinnaqtun within the Act. 	<ul style="list-style-type: none"> • The new legislation will integrate IQ principles as the foundation of ELCC and embed Inuit culture in licensed child care settings. • Inunnguiniq, the “making of a whole human being” will be a goal of early learning and child care programs. • Children’s rights will be affirmed.
Establish a duty for the Minister of Education to promote early childhood Inuit language learning	<ul style="list-style-type: none"> • Inuktitut or Inuinnaqtun should be the primary language in early learning facilities, materials, and curriculum. • Inuktitut needs to be embedded within the Act from the moment children start attending care outside of the home. • A standardized curriculum tying language to Inuit culture, health, nutrition, and learning advancement. • Establishing language standards and administering a language proficiency test to staff that interact with children to ensure they meet this standard. 	<ul style="list-style-type: none"> • The new legislation will have an obligation for the Minister to promote early childhood Inuit language development and learning in alignment with section 9 of the Inuit Language Protection Act.

Accessible, affordable, inclusive, and quality early learning and child care

Initial Proposed Legislative Change Discussion Topic	Summary: What We Heard	Updated Proposed Legislative Change
<p>Establish regulation-making authority to create new standards to guide the learning of children in child care programs</p>	<ul style="list-style-type: none"> • Minimum standards for curriculum are important to ensure consistency but flexibility is also important. • Standards should be established within the Act to ensure they are safe and well-equipped with toys, games, learning materials, and nutritious food for staff and children. 	<ul style="list-style-type: none"> • The new legislation will require operators to provide prescribed program standards and guidelines to children attending child care programs. These standards and guidelines may be established by the Minister through regulations.
<p>Create an ELCC Council to share recommendations on ELCC issues to the Minister of Education</p>	<ul style="list-style-type: none"> • Establishing a Council with a clearly defined role and mandate and that offers valuable insight and advice and reduces silos within the sector. • However, a Council may add strain to a sector already experiencing capacity issues and be redundant as the sector has numerous boards, councils, and committees. 	<ul style="list-style-type: none"> • The new legislation will establish this council with members appointed by the Minister. Members will have representation from Inuit organizations, ELCC centre management staff and Boards of Directors of centres. • The council will regularly meet to recommend policies to support sector development, inclusion and equity, as well as Inuit societal values and Inuit language support.
<p>Streamline the licensing process for child care centres by making timelines more flexible and allow for issuing temporary licences when needed</p>	<ul style="list-style-type: none"> • Streamlining the licensing process and offering flexible temporary licenses could reduce delays in opening new centres, but health and safety cannot be compromised. 	<ul style="list-style-type: none"> • The new legislation will allow for provisional licenses up to 3 months when in-person inspections are delayed. • The 30-day license issuance timeline will be updated to require that all necessary documentation be included in the application.

Initial Proposed Legislative Change Discussion Topic	Summary: What We Heard	Updated Proposed Legislative Change
<p>Establish regulation-making authority for the Minister of Education to create new standards for funding support to licensed ELCC centres</p>	<ul style="list-style-type: none"> Standards for funding could ensure accountability, consistency, and effective use of funds. A proposal-based funding model may be preferable to ensure standards do not inhibit innovation in the sector. Additional funding is required for infrastructure, wage top-ups (including Inuktitut speaking staff), enhanced training and certification upgrades, as well as training for staff working with children with special needs. 	<ul style="list-style-type: none"> The new legislation will allow the Minister to establish regulations relating to funding programs for licensed child care centres streamlining the funding for the ELCC sector and limiting the administrative tasks of centres to financial reporting, rather than proposal writing and financial reporting. This will include authority to establish minimum rates to pay staff to support recruitment and retention.
<p>Permit children over the age of 12 years to attend after school child care programs when needed</p>	<ul style="list-style-type: none"> All minors should be provided with a safe space and there is currently not enough after-school youth programs. Children over the age of 12 years have access to after-school programs and are too old to attend ELCC programming. Expanding eligibility could place additional strain on centres. (Note: there was some misunderstanding amongst the stakeholders engaged, as the Department is only proposing for children over the age of 12 to attend after school programs in centres, and not attend for the full day with younger children.) 	<ul style="list-style-type: none"> The new legislation will allow flexibility for child care centre entrance requirements to support inclusion, including related to after school programs.

Accountability

Initial Proposed Legislative Change Discussion Topic	Summary: What We Heard	Updated Proposed Legislative Change
<p>Establish broad powers to conduct investigations of licensed ELCC centres and individuals suspected of operating an unlicensed child care centre</p>	<ul style="list-style-type: none"> Investigating licensed and unlicensed child care centres can help ensure the safety of children. 	<ul style="list-style-type: none"> The new legislation will allow the Department to investigate unlicensed centres. Operators will be required to create policy documents to be kept on file with the Department. The Director will have the authority to inquire (different to an investigation) with an operator regarding adherence to these policies.
<p>Require ELCC operators to collect information related to the administration of their centres and programs</p>	<ul style="list-style-type: none"> With staff feeling overburdened by existing reporting requirements, requiring additional data collection needs to be clearly defined, standardized, and streamlined for each type of child care centre. 	<ul style="list-style-type: none"> The new legislation will allow the Minister to establish reporting requirements as a condition of licensing. Specific data requirements will be outlined in regulations and will include number of children enrolled, number of spaces, number of educators, number of inclusive spaces, and use of materials that support Inuktitut.
<p>Create the ability for the Minister of Education to share anonymous data with other funding organizations</p>	<ul style="list-style-type: none"> Anonymous data sharing could help to alleviate the administrative and reporting burden currently experienced by child care centre staff, but the process of anonymizing data should be robust and transparent. 	<ul style="list-style-type: none"> The new legislation will allow the Minister to share de-identified data with Inuit organizations and the Government of Canada.



Safety and well-being of children

Initial Proposed Legislative Change Discussion Topic	Summary: What We Heard	Updated Proposed Legislative Change
<p>Require ELCC operators to get completed criminal record and vulnerable sector checks from every employee before they start working</p>	<ul style="list-style-type: none"> Mandatory criminal record and vulnerable sector checks will help to protect the health and safety of children, though this requirement can be burdensome and may have a negative impact on staffing capacity and Elder participation. 	<ul style="list-style-type: none"> The new legislation will require criminal record and vulnerable sector checks from every child day care employee to be completed prior to employment and updated every 2 years. The 2 years is intended to offer protection without creating undue burden on the centres, staff, or RCMP. This is slightly more stringent than the 3 – 5 years required in most other Canadian jurisdictions.
<p>Require ELCC operators to get employee results of TB tests before working with children for prolonged periods of time</p>	<ul style="list-style-type: none"> Mandatory testing of employees for active TB infections will help to protect children as well as child care centre staff, though it is important to carefully consider the impact mandatory testing will have on staffing capacity and local health centres. 	<ul style="list-style-type: none"> The new legislation will require child day care employees to test for TB within three months of employment. The results of the test will not be required to be provided to the operator, as per the direction of the CPHO, recognizing that it is the responsibility of the public health system to implement any necessary actions based on test results.
<p>Establish minimum standards for recreational day camps offered by hamlets and non-profit organizations</p>	<ul style="list-style-type: none"> Minimum standards for recreational day camps will promote safe environments for participating children. It is important to consider the impact of these standards on other activities (e.g., sports) and underfunded day camps in small communities. Some organizations may be discouraged from offering programs. 	<ul style="list-style-type: none"> The new legislation will clarify that recreational camps and programs offered by hamlets and non-profit organizations are subject to minimum requirements related to age, qualification and staff to child ratios.
<p>Permit the Minister of Education to delegate the authority to exempt ELCC centres from specific requirements in the Act</p>	<ul style="list-style-type: none"> The Minister should be able to delegate authority to exempt centres from specific requirements in the Act, though checks and balances are likely needed. 	<ul style="list-style-type: none"> The new legislation will allow the Minister or delegate to exempt individuals or groups from complying with the Act. Exemptions will be published on the Department website.

5. Additional Feedback from Engagements

The feedback provided during engagements included opinions that were not directly related to the proposed legislative changes. To ensure that everything that was said during the engagements is documented, table 3 below summarizes the additional feedback that falls outside of the parameters of the legislation. The information is organized by themes that were presented in the engagement sessions.

Some of the feedback listed below will be addressed in the Department’s upcoming Action Plan for the Nunavut Early Learning and Child Care Quality Framework.

Table 3: Summary of additional feedback from engagement

Inuit Centred ELCC programs and services

Proposed Legislative Change Discussion Topic	Summary of Additional Feedback
Establish foundational principles to guide the delivery of ELCC programs and services	<ul style="list-style-type: none"> Elders should be involved in developing and implementing principles and play a role in day-to-day programming. Elders should have a central role in developing the curriculum. Prioritize hiring Inuit educators, and educators that have cultural competency and safety training over southern educators. Increase the use of culturally appropriate materials and Inuit cultural activities (e.g., country foods, sewing). Inunnguiniq curriculum and resource materials should be made available for educators and students should have greater access to materials to take home.
Establish a duty for the Minister of Education to promote early childhood Inuit language learning	<ul style="list-style-type: none"> Collaboration with Elders and language specialists to guide development of curriculum with activities facilitated by Elders such as singing and listening to stories in Inuktitut and Inuinnaqtun. Additional funding to hire more staff and support Inuit language learning. Prioritization of hiring staff fluent in Inuktitut and/or Inuinnaqtun. Incentives for staff to learn Inuktitut and/or Inuinnaqtun. Account for appropriate regional dialects in curriculum and culturally relevant take-home materials.

Accessible, affordable, inclusive, and quality early learning and child care

Proposed Legislative Change Discussion Topic	Summary of Additional Feedback
<p>Establish regulation-making authority to create new standards to guide the learning of children in child care programs</p>	<ul style="list-style-type: none"> • Consulting with Elders to develop and implement a curriculum based on developmental milestones that is standardized but adaptable to local communities and their needs. • Training for staff prior to or during employment through NAC certification programs or local trainers within communities. • Materials should be Inuit-specific, focused on play-based learning, and provide children with Inuit tools and cultural resources
<p>Create an ELCC Council to share recommendations on ELCC issues to the Minister of Education</p>	<ul style="list-style-type: none"> • Have the majority of the Council be Inuit with representation from parents and those with expertise in child development. • Membership should remain consistent over time to ensure continuity in action items. • Structured as a three-tier system of representation, including community, regional, and territorial representatives.
<p>Streamline the licensing process for child care centres by making timelines more flexible and allow for issuing temporary licences when needed</p>	<ul style="list-style-type: none"> • Significant oversight from the GN during the interim period would be required to ensure the centres remain safe. • Increasing awareness of temporary and full licensing requirements, such as through a guide or fact sheet outlining the necessary steps for licensing. • Create minimum requirements for temporary licenses (e.g., building safety inspection).
<p>Establish regulation-making authority for the Minister of Education to create new standards for funding support to licensed ELCC centres</p>	<ul style="list-style-type: none"> • Allowing the roll over of unused funding at the end of the fiscal year. • Consolidating the numerous funding streams into a single, long-term mechanism. • Less reliance on funding from the DEA and increased ability to secure external funding. • Funding criteria based on demonstrated adherence to the applicable standards. • Need to balance standards and safety, while reducing unnecessary burden.
<p>Permit children over the age of 12 years to attend after school child care programs when needed</p>	<ul style="list-style-type: none"> • Provide option but decision-making power should rest with local staff on a case-by-case basis, considering both the needs of the child and the capacity of the ELCC centre. • If children over 12 years are to be included, they should be in a different group, rather than mixing with younger children and babies.

Accountability

Proposed Legislative Change Discussion Topic	Summary of Additional Feedback
<p>Establish broad powers to conduct investigations of licensed ELCC centres and individuals suspected of operating an unlicensed child care centre</p>	<ul style="list-style-type: none"> • Investigations should be solutions orientated to ensure compliance, not punitive. • Ensure that centres understand what violations can lead to investigations and provide support to resolve issues. • Partnerships with authorities like the Health and Safety Unit and the fire department can help resolve issues.
<p>Require ELCC operators to collect information related to the administration of their centres and programs</p>	<ul style="list-style-type: none"> • Additional support, funding, and training to meet new data collection requirements. • Streamline existing reporting requirements before adding new requirements (e.g., data reported to multiple parties, review of data being collected).
<p>Create the ability for the Minister of Education to share anonymous data with other funding organizations</p>	<ul style="list-style-type: none"> • Establishing an online portal for centres to submit all information where they can choose which parties access their data. • Establish policy/direction/guidelines on information protection and confidentiality before data is shared with other organizations. • Consult with centre staff to identify reporting efficiencies.



Safety and well-being of children

Proposed Legislative Change Discussion Topic	Summary of Additional Feedback
<p>Require ELCC operators to get completed criminal record and vulnerable sector checks from every employee before they start working</p>	<ul style="list-style-type: none"> • Frequency of checks ranged from six months to five years. • Determine what criminal offenses should be unacceptable for employees working with children. • If mandatory check requirement applies to Elders, consider how to make it less burdensome for them
<p>Require ELCC operators to get employee results of TB tests before working with children for prolonged periods of time</p>	<ul style="list-style-type: none"> • Collaborating with the Department of Health or local health centres to facilitate testing. • Consider placing those with active TB infections on modified duties (i.e., in a non-child-facing position). • Requiring regular testing is important but annual tests would be too onerous. • Elders may feel uncomfortable going to health centres to complete testing.
<p>Establish minimum standards for recreational day camps offered by hamlets and non-profit organizations</p>	<ul style="list-style-type: none"> • Training or certification could include First Aid and/or CPR certifications and babysitting courses. • Suggested minimum age requirement for camp staff ranged from 18 to 19. • Developing and monitoring appropriate staff-to-children ratios. • Recreational camps may need additional funding to meet standards.
<p>Permit the Minister of Education to delegate the authority to exempt ELCC centres from specific requirements in the Act</p>	<ul style="list-style-type: none"> • Specifying the individuals to whom the Minister is permitted to delegate authority (e.g., Deputy Minister, Assistant Deputy Minister, ECE Officers). • Local DEAs or GN should be able to investigate. • Establishing a committee to review any exemptions made under delegated authority.



Appendix A. Engagement Questions

Community and Public Engagement Questions

During meetings with stakeholders and public consultation sessions, a PowerPoint presentation was shared followed by an open discussion on the proposed legislative changes.

Public Survey Questions

1. Can we use your input in a summary report that will be published on the Department of Education's website? No identifying information will be shared. However, some input may be linked to your geographic region. If you choose no, you will be redirected to the end of the survey.
[yes/no]
2. Have you ever used child care services provided through a licensed early learning and child care (ELCC) centre?
[yes/no]
3. What region do you live in?
[multiple choice question]
4. Do you think the inclusion of foundational principles will support Inuit-centred early learning and child care in Nunavut?
[Yes/no]
a. Why / Why not?
5. How can the Department of Education promote early childhood Inuit language learning?
[free-text response]
6. Do you think the Department of Education should regulate curriculum and learning standards for children?
[Yes/no]
a. Why / Why not?
7. Do you think an Early Learning and Child Care Council will support decision-making?
[Yes/no]
a. Why / Why not?

8. Do you think issuing temporary licences when needed will help improve the licensing application process?

[Yes/no]

a. Why / Why not?

9. Do you think the Department of Education should regulate standards for funding support to licensed early learning and child care centres?

[Yes/no]

a. Why / Why not?

10. The Act currently defines children as being under 12 years of age. Do you think children over the age of 12 should be allowed to attend child care programs when needed?

[Yes/no]

a. Why / Why not?

11. Under the current Act, the department can investigate child care centres operating without a license. Do you think the department should be able to investigate other issues, such as the ability to investigate if a licensed child care centre is following its board approved policies?

[Yes/no]

a. Why / Why not?

12. The Department of Education is interested in exploring ways to make it easier for ELCC centres to report on information. ELCC centres that access funding may be asked to report the same information multiple times - to the department and other organizations (e.g., federal government departments and Inuit organizations). Do you think that the Department of Education should be able to share anonymous information on ELCC centre with other organizations?

[Yes/no]

a. If yes, please describe.

13. Do you think that criminal record and vulnerable sector checks should be mandatory for all ELCC staff?

[Yes/no]

a. Why / Why not?

14. Do you think tuberculosis (TB) testing should be mandatory for all ELCC staff before they start working with children for prolonged periods of time?

[Yes/no]

a. Why / Why not?

15. Do you think recreational day camps should be regulated under the Act by some minimum standards, such as the age and qualification of staff?

[Yes/no]

a. Why / Why not?

16. Under the current Act, only the Minister of Education can exempt early learning and child care centres from legislated requirements. Do you think the Minister should be able to delegate this power when needed?

[Yes/no]

a. Why / Why not?

17. Is there anything else you would like to share on your experience with Nunavut's early learning and child care programs and services?

[free-text response]



