



# **Submission**

**by the Canadian Union of Public  
Employees (CUPE)**

**to the**

**Ministry of Education**

**Consultation on Child Care and Early  
Years Strategy**

Submitted: January 30, 2017

### Introduction

CUPE Ontario represents 240,000 workers in municipalities, health care, school boards, social services, child care and post-secondary education. CUPE has a keen interest in early childhood education and child care (ECEC) for three main reasons. First, we represent ECEC workers across these diverse settings. Second, child care affects our own members who are parents and grandparents. Finally, high quality, publicly-funded, public and not-for-profit child care for all is a key social justice issue and a crucial strategy for addressing the gender wage gap.

CUPE has a long history of fighting for child care with our labour and community partners. From CUPE's perspective, high-quality ECEC for all children is in our collective best interests. As such, we were pleased to hear of the government's intention to create 100,000 new child care spaces in Ontario. This is an opportunity to begin a transition from a mismatched patchwork of market-based services to a cohesive system of quality child care that all families can afford, access that that meets their needs.

In principle, CUPE supports the pillars of access, responsiveness, affordability and quality that have been identified by the government. This is with several caveats:

- Services must be made available to all children regardless of income, family type, where they live, ability or disability, ethnicity or race.
- Expansion of spaces does not occur in the for-profit child care sector, where public resources are directed toward corporate profits with resulting negative impacts on quality care.
- A workforce strategy be a core component of a renewed framework for early years and child care to address the low wages, and poor working conditions that make it difficult to recruit and retain child care workers.

The reality is that the pillars interrelate: access is integrally linked to affordability—families do not have access to child care if fees make it unaffordable; responsiveness and access go hand in hand—if child care services are not available to shift and/or precarious workers, you have neither a responsive nor accessible system; quality and responsivity connect—quality and responsive programming is best achieved with a workforce of child care workers with good wages, benefits and working conditions.

Our more detailed response to the consultation below will include some cross over in addressing the four pillars given their overlap.

### Recommendations

#### Overarching principles

CUPE Ontario believes all four principles of access, responsiveness, affordability and quality are best achieved within a publicly funded, planned and managed system for all children rather than our current market-based approach. This significant expansion of spaces is an opportunity to build a comprehensive and quality child care system for all children. CUPE Ontario encourages the provincial government to refer to the vision outlined in the *Shared framework for building an early childhood education and care system for all*, which provides evidence-based recommendations in developing an ECEC system for all levels of government.<sup>i</sup>

The changes we are proposing in our submission would involve a fundamental shift in how child care is structured and delivered in Ontario. It would include a strengthened policy framework with short and long term goals. It would make fees more affordable by introducing a sliding scale for parent fees with reasonable caps and the remainder of funding provided through operational base funding to licensed child care centres.

It is important to place this child care space expansion within the international context of federal and provincial governments' commitments regarding ECEC. Canada is party to international agreements that recognize the role of governments in ensuring access to early learning and child care for children and women. The *Convention on the Rights of the Child* requires that state parties "render appropriate assistance to parents and legal guardians in the performance of their child-rearing responsibilities and shall ensure the development of institutions, facilities and services for the care of children". It also requires that the parties take measures to ensure children of working parents benefit from child care services.<sup>ii</sup> The *Convention to Eliminate All Forms of Discrimination against Women* requires that state parties establish a network of child care facilities to help parents combine family obligations with work and participation in public life.<sup>iii</sup> It is widely recognized that quality ECEC is a fundamental requirement in order to respect the human rights of both children and women.

Quality ECEC programs are also associated with substantive benefits for children. Research has shown high quality ECEC can help children's cognitive and social development. These benefits exist for all children but can be even more pronounced for disadvantaged or marginalized children.<sup>iv</sup> Programs staffed with trained and knowledgeable educators can help children develop physically, emotionally, culturally, cognitively, and creatively. ECEC is not only a right for children but also helps promote their healthy development. These programs should be available to all children and families in our communities.

Given Canada's international obligations, we urge the government to make a significant investment in the first two of the five year space expansion in order to support children, women and the economic well-being of our communities as soon as possible. A rapid expansion of spaces would:

- Ensure children have access to high quality care that supports their school-readiness, cognitive and emotional needs, and health outcomes through quality nutrition and programming offered in licensed regulated child care centres.
- Reduce barriers for women to participate in the paid labour force, which would help address the 30 per cent average pay gap between women and men in Ontario.
- Help support the economic well-being of our communities through the greater participation of women in the paid labour force. When Quebec introduced its affordable child care program, nearly 70,000 more mothers entered the paid labour force resulting in a 1.7 per cent increase in the Gross Domestic Product. A City of Toronto study found that when child care costs are limited to 10 per cent of family income, the probability of main caregivers being employed full time increases to 60 per cent from the current 47 per cent.<sup>v</sup>

We need to see the many societal benefits of quality, affordable child care for all as soon as possible. We encourage the government to front load this investment in Ontario's children, parents and communities.

### *Recommendations*

- The government expand spaces through a publicly funded, planned and managed system for all children rather than our current market-based approach;
- Ensure a significant investment in the first two years of the five year child care expansion plan to ensure the benefits to children, parents and communities happen as soon as possible;
- All future public investment in child care be made in the public and not-for-profit sectors.

## **Access**

There are many serious barriers to access including the long waitlists for licensed child care spaces, the costs that are unaffordable to most parents, the lack of options for shift workers and in rural communities, the lack of available spaces for children with special needs, programs that do not respect the cultural, linguistic and ethnic diversity of communities and a child care system that is difficult for parents to navigate.

Access needs to be seen in a tangible light where children and families have access to child care spaces that meet their needs. At its most basic, this involves a sufficient number of child care spaces for all families who want them. Right now in Ontario, we are far from this with spaces for only 20.8 per cent of children.<sup>vi</sup> In Ottawa, 8,830 children were waiting for a licensed child care space in February, 2016.<sup>vii</sup> The creation of 100,000 spaces which will result in licensed child care spaces for 40 per cent of Ontario's children is a positive step toward access for all; however, there is still much to do.

At the same time, spaces need to be available where they are needed in order to be accessible and responsive to parents' needs. They need to be convenient, close to public transit and in underserved areas including lower-income and rural communities. The role of municipal child care system managers in consulting with communities to prioritize new spaces being developed in under-served communities needs to be prioritized in any new policy framework. We encourage the government to focus on building a publicly funded and managed child care system through which this kind of planning can take place.

Child care also needs to be available when you need it in order to be responsive; this is particularly true for workers who work non-standard hours when child care options are scanty.<sup>viii</sup> This could include those working early morning, evenings or overnight shifts, rotating or split shifts, casual or irregular shifts or working multiple jobs.

### *Recommendations*

- Strengthen the public policy and planning that will guide the creation of new child care spaces with attention to the proximity to public transit and in prioritizing underserved areas including lower-income and rural communities;
- Create the policy and planning structure within which child care spaces for workers who work non-standard hours are prioritized.

## **Responsiveness**

Responsiveness needs to be at the heart of the child care space expansion in Ontario. The expansion needs to provide options for workers in precarious jobs, children with special needs and have diversity

and equity as core principles. The labour market has been shifting with increasing numbers of precarious jobs with insecurity, uncertainty and a lack of control.<sup>ix</sup> Workers in precarious jobs often have particular difficulty accessing child care due to a lack of predictable hours of work. These jobs are more likely to be held by females, racialized workers and recent immigrants.<sup>x</sup> While these damaging and dangerous precarious working conditions need to be regulated by the government,<sup>xi</sup> child care options need to be available to precarious workers. The child care spaces being developed need to provide viable options that meet the needs of these workers.

The new policy framework also needs to provide the funding and policy enabling the full inclusion of children with special needs in all child care programs for children 0-12 years. The lack of a cohesive child care system limits the inclusion of children with special needs; the reality is that children with special needs have uneven access to child care depending on where they live and their income level. Often parents of children with special needs are left on waitlists or with limited options when it comes to child care and centres are left in a bind without the resources to support inclusion.

The new policy framework needs to set provincial standards when it comes to inclusion. Resources are central to this mix; centres need to have access to trained special needs resource staff to support and facilitate inclusion. At the same time, many special needs resource staff leave the field due to low wages and poor wage conditions, highlighting again the importance of a workforce strategy. A number of studies have highlighted that inadequate funding, a lack of good policy and the limited number of inclusive programs are barriers to moving forward with inclusion in Canada.<sup>xii</sup> This expansion of services is the perfect opportunity to create the policy and funding structure to foster inclusion in Ontario.

This approach needs to expand beyond the early years into school age programs for children 6-12. Children with special needs should have access to high quality programming provided by trained and skilled Early Childhood Educators with supports for inclusion throughout infancy, the early years and school age. Child care licensing requirements should be extended to recreation and skills building programs in order to ensure inclusivity alongside health and safety, adequate facilities and ratios.

Under the expanded system, child care centres should integrate seamlessly with transformed Ontario Early Years Child and Family Centres (OEYCFC) and continue to provide valuable parental and child supports. These programs should prioritize a “schools first” approach in order to make services accessible and convenient for children and families. Attention should be paid to ensure current successful practices are replicated and expanded in the transformation. For example, research on Parenting and Family Literacy Centres in the Toronto District School Board has shown:

- A direct impact on pre-schoolers through a holistic, play-based approach with daily structured and semi-structured programming;
- A direct impact on parent participants through their active participation in the program; and
- An impact of the parent worker on children and parents to engage children and empower parents.<sup>xiii</sup>

We encourage the provincial government to ensure these practices with a proven track record continue and are expanded in the transformed OEYCFC and ECEC system.

Furthermore, equity, diversity and respect for the racial, cultural and ethnic differences within our communities needs to be at the center of a responsive child care system. There needs to be specific attention paid to off and on-reserve child care for Indigenous communities that respects the unique

status and rights Aboriginal peoples have in Canada under the Constitution and through treaties. These programs and services need to be culturally safe and incorporate Indigenous languages and local knowledge on child rearing and receive more financial support from the government.<sup>xiv</sup>

### *Recommendations:*

- Ensure the revised policy framework prioritizes the creation of child care that meets the needs of precarious workers;
- Provide funding and create policy that will support the inclusion of children with special needs;
- Ensure promising practices and programs such as Parenting and Family Literacy Centres will be continued and expanded in the transformed OEYCFC and ECEC system;
- Create the policy and planning supports that will ensure diversity and equity are core principles of the expanded child care system.

## **Affordability**

Affordability is a key barrier when it comes to early childhood education and care in Ontario. Child care fees in Ontario are unaffordable to most parents. In Toronto median infant fees are \$1,649 per month, the highest in the country. This is more than two times the amount university students pay for tuition in Ontario. It eats up a significant portion of parents' incomes. A study for the City of Toronto found that licensed child care was unaffordable for 75% of families.<sup>xv</sup> Furthermore, fees are not decreasing—they have risen by 8 per cent in Canada's largest cities between 2014-2016 when the rate of inflation has been 2.5 per cent.

Child care is unaffordable to many middle class families. The situation is even more dire for lower-income households. Even if a family in Ontario qualifies for subsidized child care, they may be placed on a long waitlist and have to pay full fees for a period of time. In Toronto, 18,405 children are on the waitlist for a subsidized child care space. This is a 57 per cent increase from the previous year.<sup>xvi</sup>

It's time for a total restructuring of funding and fees. As previously proposed, the provincial government should shift to a more sustainable funding model providing long-term operational funding to child care centres with fees on a sliding scale based on income. This would help stabilize child care centres, which have been struggling with a new funding model and the introduction of full-day-kindergarten. Base funding would also help address high parent fees—the evidence on parent fees shows that provinces which set fees and fund services directly by providing base funding have the lowest child care fees in every age range.<sup>xvii</sup>

It is also critical that for-profit child care centres do not receive public funding. The experience of corporate child care in Australia and the UK shows that when corporations dominate, parent fees soar and governments make hefty payouts to support shareholders' profits. The for-profit child care sector represented 25 per cent of licensed centre-based spaces in Ontario in 2012. We need to ensure that future child care investments are made in public and non-profit child care in Ontario. CUPE encourages the government to ensure the new policy framework is centred on evidence-based policy that highlights the importance of base funding in child care and public and not-for-profit delivery.

### *Recommendations:*

- The government transform the funding and fee structure by providing operational base funding to licensed child care centres and introducing a sliding scale for parent fees with reasonable caps;

- Ensure the expansion of child care spaces does not occur in the for-profit child care sector but rather in the public and not-for-profit sector in order to foster affordability.

### Quality

The Province should focus on structural factors that can influence quality – such as better wages and training for staff, and public and non-profit provision. The research is clear: public and non-profit child care consistently receives higher quality ratings than for-profit centres. In fact, municipal child care was determined to have the best quality across all age groups.<sup>xviii</sup> Given the increased quality, the provincial government should ensure our child care system is built on public and non-profit child care.

Big-box child care centres have been gaining a significant foothold in Ontario with 25 per cent of regulated centre-based child care spaces in 2012. No jurisdiction in which child care is treated as a for-profit business has a track record of equitable access or high quality. The countries in which ECEC is widely accessible and meets benchmarks for quality are those that have adopted public management, public funding and public/not-for-profit delivery. Given that Ontario has expressed a commitment to high quality ECEC, it should ensure the child care network consists only of public and non-profit licensed child care centres.

Unfortunately, many municipal child care closures have taken place over the last few years—services that have been developed using considerable volunteer community resources, public resources and public funds. We would argue that these are among Ontario’s “choicest” child care options, providing leadership, innovation and often serving hard-to-serve and higher needs populations. Additionally, as the research shows, these are also likely to be the top quality services, as well as those that are most likely to be deemed unviable because they provide services and supports for vulnerable families and children. Through this expansion of spaces, the government should work to shore up existing municipal child care spaces and expand spaces in these best practice centres.

There is strong evidence that supports our view that a child care system is best grown through public/not-for-profit regulated child care. The discussion around the expansion of child care spaces must be focused on raising the floor on quality indicators such as group size, child-staff ratios, Early Childhood Educator requirements and quality indicators that include play based learning environments. Promoting growth through expansion of home-based child care is not the way to grow and develop the system. Home based child care programs may make sense in rural and remote communities; however, in larger communities, expansion should be in public and not-for-profit centres established based on data regarding changing community demographics and needs.

Fundamentally, quality is linked to staffing; when wages and working conditions are poor, it is difficult to recruit and retain child care workers. Quality programming cannot occur without well-remunerated staff with good working conditions that allow for consistent education and care. In Ontario, the median gross hourly wages for program staff was \$17.29 in 2012. Across the country 25 per cent of all program staff earned below \$14.00 per hour.<sup>xix</sup> These wage rates fall far below the value of the work performed and below the earnings levels appropriate for the skills and responsibilities required of workers. Moving to base funding for licensed child care centres will support child care workers in achieving decent work and wages. The government should develop a workforce strategy in tandem with community and labour partners that prioritizes increasing wages and benefit levels in the sector.

Quality is also linked with the ECEC funding model. The OECD suggests moving from personal subsidy model to operational grant funding with regards to ECEC: “Earmarked operational grant funding seems to be a surer means of ensuring more highly qualified personnel and enriched learning environments in the centres – both of which are strong indicators of quality and learning.”<sup>xx</sup>

Quality should also encompass other important values such as inclusion for children with disabilities, cultural safety, and equitable access for all families. The Province should engage with child care experts and researchers to develop a robust data and research agenda to monitor quality as programs develop.

### *Recommendations:*

- The provincial government should highlight the role of municipal child care as best practice innovative approaches through supporting the continuation of municipal centres and prioritizing space expansion in them;
- The government should develop a comprehensive workforce strategy with labour and community partners that will strengthen recruitment and retention of current child care staff and support the hiring of new staff required by the expansion of spaces.

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<sup>i</sup> See CCAAC, CRRU, CCCF, Campaign 2000, Shared framework for building an early childhood education and care system for all; and Child Care in Canada by 2020: A vision and a way forward prepared for the Child Care 2020 Conference in 2014.

<sup>ii</sup> Convention on the Rights of the Child, 20 Nov 1989, arts 18.2 and 18.3 (ratified by Canada in 1991).

<sup>iii</sup> Convention on the Elimination of All Forms of Discrimination against Women, 3 September 1981, art 11.2(c) (ratified by Canada in 1981)

<sup>iv</sup> See Peisner-Feinberg, E. Burchinal, M. Clifford, R.M., Culkin, M.L., Howes, C., Kagan, S.L. and Yazejian, N., The relation of preschool child-care quality to children’s cognitive and social developmental trajectories through second grade. *Child Development*. September/October, Vol 72, Number 5: 1534–1553, 2001; and Van Belle, J. Early childhood education and care (ECEC) and its long-term effects on educational and labour market outcomes. 2016, Santa Monica, CA: RAND Corporation.

<sup>v</sup> Cleveland, Krashinsky, Colley and Avery-Nunez, City of Toronto Licensed Child Care Demand and Affordability Study, October 2016.

<sup>vi</sup> Ferns, C., Friendly, M., The state of early childhood education and care in Canada 2012, Moving Childcare Forward Project.

<sup>vii</sup> City of Ottawa, Children’s Services Child Care Service Plan 2016-2017

<sup>viii</sup> Halfon, S, Friendly, M, Occasional paper No. 29: Work around the clock: A snapshot of non-standard hours child care in Canada, Childcare Resource and Research Unit, 2015

<sup>ix</sup> The Precarity Penalty: The impact of employment precarity on individuals, households and communities—and what to do about it, PEPSO, McMaster University, United Way Toronto, 2015

<sup>x</sup> Block, S., A Higher Standard: The case for holding low-wage employers in Ontario to a higher standard, CCPA Ontario, 2015

<sup>xi</sup> See CUPE’s submission on the Changing Workplaces Review interim report

<sup>xii</sup> See Bancroft, R, Underwood, K, A vision for inclusive child care: From principles to policy, Our Schools Ourselves, Canadian Centre for Policy Alternatives, V.24, no 4 (#120), 2015; Frankel, E.B., Gold, S. & Ajodhia-Andrews, A. International preschool inclusion: Bridging the gap between vision and practices. *Young Exceptional Children*, 2010, 13(5), 2-16, ; Frankel, E. B. Supporting inclusive care and education for young children with special needs and their families: An international perspective. *Childhood Education*, 2004, 80(6), 310-316; Halfon, S., Friendly, M,



Occasional Paper No. 27: Inclusion of young children with disabilities in regulated child care in Canada A snapshot: Research, policy and practice, Childcare Resource and Research Unit, 2013.

<sup>xiii</sup> Toronto District School Board, Parenting and Family Literacy Centres: Engaging Children, Empowering Parents, Research Today Vol. 8, Issue 1, 2012-13

<sup>xiv</sup> Issac, K, Jamieson, K, A good path forward: Understanding and promoting Aboriginal early childhood development and care, Our Schools Ourselves, Canadian Centre for Policy Alternatives, V.24, no 4 (#120), 2015

<sup>xv</sup> Cleveland, Krashinsky, Colley, Avery-Nunez, City of Toronto Licensed Child Care Demand and Affordability Study, City of Toronto, 2016

<sup>xvi</sup> City of Toronto, Dashboard: Number of Children on Wait list for a Child Care Fee Subsidy, October 2016.

<sup>xvii</sup> MacDonald, D., Friendly, M., A Growing Concern: 2016 Child Care Fees in Canada's Big Cities, Canadian Centre for Policy Alternatives, 2016.

<sup>xviii</sup> Childcare Resource and Research Unit, What research says about quality in for-profit, non-profit and public child care

<sup>xix</sup> Child Care Human Resources Sector Council, You bet we still care: A survey of Centre-Based Early Childhood Education and Care in Canada: Highlights Report, 2013

<sup>xx</sup> OECD Early Childhood Education and Care Policy: CANADA Country Note,