



ONTARIO PUBLIC
SCHOOL BOARDS'
ASSOCIATION

Leading Education's Advocates

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**OPSBA Submission regarding the Proposal to Amend Regulation 262 under the
Day Nurseries Act – Child Care Modernization Document**

The Ontario Public School Boards' Association (OPSBA) appreciates the opportunity to respond to this proposal concerning proposed changes to Regulation 262 under the *Day Nurseries Act*. Since the introduction of Full Day Kindergarten in 2010, our association and its member boards have been profoundly attuned to the changes that have affected both school boards and the child care sector. We have provided comments and feedback to several discussion papers concerning both sectors and will continue to advocate on behalf of our member boards for changes that promote public education in our schools and stabilize the child care community.

In general, we are supportive of changes that aim to modernize childcare and our understanding is that the changes contemplated in this proposal would be picked up automatically if Bill 143, *Child Care Modernization Act, 2013*, receives Royal Assent. (We are following the legislative process for this bill and note that at this time second reading debate has begun.)

We support the three priority areas of the proposal: program quality, access and flexibility and health and safety. As a school board association, we acknowledge that we are not experts in commenting on the specifics of child/staff ratios in child care settings. However, it must be noted that we share the widespread concern for changes that would have less qualified staff responsible for more children. Quality of care suffers without quality staff and this should not be compromised.

We are also supportive of changes that acknowledge the professionalism and accountability of early childhood educators, and that provide standards of care across the province. It should be noted and cannot be stressed enough that school boards are anxious for changes that would close gaps in legislation that apply to child care and school boards. We would prefer to see earlier amendments to practical operational issues that affect both sectors and consider this to be a priority item. We have asked before for a review of the difference between the *Day Nurseries Act* and *Education Act* with respect to Fire Regulations, Space Requirements, Playground Standards, Nutrition Standards (PPM 150) and perhaps others. These requirements should not be different for children who attend school from 9 a.m. to 3 p.m. than those who attend either before or after the regular school day.

Below we have provided comments for those amendments that affect children in schools and/or those that intersect with the education sector. We have not commented about those proposed changes regarding private home day care. The comments are based on feedback and conversations from school board trustees, early learning leads at member boards and other educational partners.

Policy Statement to Guide Program Content and Educator Practice

OPSBA is supportive of a provincial policy statement that focuses on quality and provides a continuity of expected standards across the province. This would provide a more consistent approach for learning and inform parents about what they can expect their child to learn and experience while in care. The proposal indicates that the policy statement would be accompanied by complementary regulatory amendments and we suggest that the ministry consult on these proposed changes regarding parent communications, outdoor play and rest times. It has been suggested that these changes need to consider differences between school age (and younger) children and also children with special needs.

This particular amendment focuses on enhancing quality and it would be beneficial to learn more about the government's intentions with regards to quality measurement and the tools used that also ensure consistency (this was also referred to in terms of consistency of inspection standards).

It was also stated that quality programs must be supported by quality staff and this should include increased and ongoing professional development. This has led to discussions around pay equity among the ECE community.

Centre-Based Child Care: Same Age Groupings and Ratios for Children under School Age, Group Sizes and Employee to Child Ratios

As stated above, we share the concerns expressed by the child care community regarding young age groups and the ratios of qualified staff. We would expect there to be more consultation with the sector about these proposed age groupings that are garnering the most attention.

The changes were generally met with support as they provided centres with the flexibility to use this new model in addition to current ratios in the regulation. Local needs could therefore be met more easily based on the number of children and ages that the centre had. Other comments included:

- Appreciate the use of ages instead of months – easier to understand
- Appreciate that staff requirements clearly state the minimum of one RECE
- Support the change for 4-5 year olds – this matches the average for full day kindergarten.

There were some questions about how space and centre set-up might be impacted when using two models of the ages of the children involved. Will there be sufficient space for all children?

Centre-Based Child Care for School Age Children: Age Groupings, Ratios, Group Size and Staff Qualifications

OPSBA is very supportive of this proposed model that splits the age groups into six to eight-years-old and nine to 12-years-old categories. This acknowledges the fact that school age children are at a different developmental stage and have more varied interests. In addition, this amendment allows much flexibility for the staffing qualifications for these ages and could be decided locally so that a centre could hire someone in a field of study that also interests, and ultimately benefits, the children. By allowing non-RECE candidates for the older children, it would open the door for supply teachers and possibly new teacher graduates.

It was generally supported that the younger children in the 6-8 age group would still benefit from having an RECE as a program staff person. This model would be a better fit to address the developmental needs of this age group.

The proposed 9-12 model suggests that “operators would be encouraged to include an engaged youth (13 to 19 years old) along with the qualified staff member to assist in the provision of program.” We felt that there would be many benefits for the youth, the child centre and children. Members were supportive of

having youth involvement but had questions about determining the “engaged youth” – how is this youth chosen or hired and based on what qualifications? It was also noted that the program assistance would have to be done in an age-appropriate manner (i.e. a 13-year-old would not be assisting a 12-year-old). Other questions/comments included:

- This age group would not be able to obtain a criminal reference check and so supervision guidelines would need to be outlined
- Would the youth be paid or would/could this be part of secondary school volunteer hours?
- Recommend that clear expectations, responsibilities and supervision for this youth position be consulted on before implemented.

Centre-Based Child Care: Multi-Age Groupings

This model was proposed as a solution for small communities where child care options are limited. It was felt that this model should not be limited to these communities but be applicable for all centres, which should be allowed to use the multi-age groupings if they felt it would be beneficial to them and the families they serve. We do believe this also offers the flexibility to incorporate traditional cultural and educational perspectives in a range of communities including First Nation, Métis and Inuit families. A model that reflects the family structure with older children teaching younger children is a valued practice in sharing and passing along customs and traditions.

Criminal Reference Checks (CRC) and Vulnerable Sector Screening (VSS)

OPSBA supports the obligation for licensed child care operators to have policies requiring a Police Record Check including a Vulnerable Sector Screening. We believe that all adults working or volunteering in a child care environment should be subject to this requirement, and that provision should be made in the policy to re-check all staff/volunteers at least every five years.

We are aware that the current process is too long and varies across the province. OPSBA recommends that the Minister of Education initiate the designation of the Ontario Education Service Corporation (the OESC, a non-profit corporation governed by all Ontario School Boards) as an ‘Authorized Body’ under the Federal Criminal Records Act for the purpose of providing timely record checks and its high standard of adjudication services for all staff/volunteers as required by the Policy. OESC has a considerable depth of experience in this area.

First Aid Training

We recommend that all full time employees have current first aid training, not just 50% as suggested in the proposed amendment. Our members had some questions about who is providing and paying for the training (is this a professional accreditation responsibly or the employers?). It was suggested that child care supervisors be aware of the other "health-related issues" issues and laws that schools boards much adhere to (i.e. Sabrina’s Law, Concussion procedures etc.)

Nutrition Requirements

We support using the revised Canada Food Guide as a minimum, with menus reviewed and approved by a dietician on a regular basis, particularly to support food substitutions and/or dietary restrictions. This also led to a discussion about how child care centres may be asked to mirror requirements for school boards in PPM 150 School Food and Beverage Policy.

NEW Regulation under the Early Childhood Educators Act, 2007

OPSBA met with the College of Early Childhood Educators to discuss this new regulation. We support increasing the breadth of the public appointees to the CECE Council to include representation from First Nation, Métis and Inuit and Francophone communities and to also include parents of special needs children. We would also support similar changes to the Ontario College of Teachers council to include an individual(s) with knowledge or experience in early childhood education.

In closing, we would like to take the opportunity to restate that OPSBA has a strong record of promoting the fundamental importance of early learning and urging recognition that investing in our youngest children in the early years represents the most far-reaching and responsible investment we can make in Ontario's future. With child care now the responsibility of the Ministry of Education, we see it as part of the education continuum and as such, we welcome any discussion that supports and promotes strong working partnerships among child care providers and schools.

Sincerely,

A handwritten signature in black ink that reads "Michael Barrett". The signature is written in a cursive style with a long horizontal stroke at the end.

Michael Barrett
President of the Ontario Public School Boards' Association

The Ontario Public School Boards' Association (OPSBA) represents public district school boards and public school authorities across Ontario. Together our members serve the educational needs of almost 70% of Ontario's elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA believes that the role of public education is to provide universally accessible education opportunities for all students regardless of their ethnic, racial or cultural backgrounds, social or economic status, individual exceptionality, or religious affiliation.