

April 29, 2026

OPSBA Submission re: Enhancing Health and Safety in Child Care Programs Regulatory Proposal

The Ontario Public School Boards' Association (OPSBA) appreciates the opportunity to provide feedback to the current [proposal](#) initiated by the Ministry of Education concerning proposed amendments to Ontario Regulation 137/15 (General) made under the Child Care and Early Years Act, 2014 (CCEYA) that are intended to enhance health and safety protections in child care programs.

Schools have long maintained successful partnerships with their local community providers, including licensed child care programs, which are present in more than half of Ontario's English public schools. We are supportive of these new requirements for child care programs and note that many of the changes will align with current practice found in schools. We agree that they will address gaps and increase measures to keep both children and staff safe in local communities across Ontario.

As many child care programs are located within schools and may also have shared spaces, we encourage child care operators and their school-based leads to discuss these changes and work together on implementation and communication plans.

With regard to the specific areas considered in this proposal, below are the observations and comments shared by OPSBA's Policy Development Work Group.

1. **Vehicle Impact Protection** – The proposed regulations would require licensed child care centres to ensure the centre and its outdoor play space are protected by physical barriers that prevent vehicles from entering these areas. The regulations would also provide for alternate options in situations where the use of physical barriers may not be possible.

OPSBA Comments:

- Supportive of this safety measure and the allowance for flexibility depending on the location of the child care in or on school property (including those not on ground floor levels).
 - Support the allowance of local flexibility for types of barriers (permanent, movable, planters, etc.) that follow safety standards.
 - Appreciate that this will apply as on January 1, 2027, on a go-forward-only basis and not be required for current sites.
 - Suggest EDU share/connect with MAH/municipalities about any zoning or site plan approvals.
 - Suggest EDU include this requirement on future site/capital plans.
 - Need to understand more about full financial costs and who ultimately funds any barriers that would not be supported by the Liam Riazati Memorial Fund.
2. **Septic Safety** – Proposed regulations would require all licensees to ensure septic access points located on the property of a licensed child centre or licensed home child care premises to be secure, inaccessible to children, and have a secondary safety device installed. In addition, newly licensed child care centres would no longer be permitted to have septic access points in outdoor play spaces.

OPSBA Comments:

- Supportive of this safety measure as these spaces need to be as secure and safe as possible.
- It is our understanding that existing school board septic systems are inaccessible by students on school properties that have them.

3. **Unauthorized Entry** – All licensed child care centres would be required to have measures in place to prevent unauthorized individuals from entering the centre during hours of operation.

OPSBA Comments:

- Supportive of this safety measure and reflects current practice in elementary schools.
- Need to consider any sites that have doors connecting schools and child care.
- Suggest EDU include this requirement on future site/capital plans.

4. **Modernizing Medication Administration** – The ministry is proposing changes to current regulatory requirements to ensure medications that must be accessed quickly are easier to access when they are needed in licensed child care programs.

OPSBA Comments:

- Supportive of this change to allow the medications that are regularly used during the day to be accessible. This would be similar to [EDU's Prevalent Medical Conditions PPM 161](#).

5. **Additional Criminal Convictions to Prevent an individual from Providing Child Care** – The ministry is proposing regulatory amendments to better protect children and strengthen rules related to child care staff and providers whose actions or behaviour may place children at risk.

OPSBA Comments/Questions.

- Supportive of this safety measure.

6. **Prohibited Practices** – The regulations under the CCEYA also outline practices that are prohibited in licensed child care settings. The prohibited practices set out under the CCEYA include corporal punishment, physical restraint (except for safety), confining a child, use of harsh or degrading measures, depriving a child of basic needs, and inflicting bodily harm on a child.

OPSBA Comments/Questions.

- Supportive of this safety measure.

Thank you again for this opportunity and for the information meeting held between OPSBA staff and the ministry's child care branch. We ask that information on next steps be shared with the sector when available.

The Ontario Public School Boards' Association represents English public district school boards and public school authorities across Ontario, which together serve nearly 1.4 million public elementary and secondary students. The Association advocates on behalf of the best interests and needs of the public school system in Ontario. OPSBA is seen as the credible voice of public education in Ontario and is routinely called on by the provincial government for input and advice on legislation and the impact of government policy directions.