

To the City Clerk:

I would like to submit a written submission to the Economic and Community Committee on November 12, 2020 to speak on item 2020 [EC17.12](#) - Response to Proposed Regulations under the Child Care and Early Years Act, 2014.

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To the Economic and Community Committee, thank you for reviewing Toronto's response to proposed regulations under the Child Care and Early Years Act (CCEYA). My name is Neena Locke and I am the Director at Red Apple Day Care. We are a non-profit childcare center that serves children from 3 months to 12 years of age. We have a capacity of 199 children. We are situated in a very high needs area in Toronto between two neighborhoods of Thorncliffe Park and Flemington Park. We provide quality programs to our community since 1986.

Our child care centre and the community we work with are highly concerned by the provincial government's proposed regulatory changes to the CCEYA. We know the value that quality early learning and child care programs provide in strengthening our community and supporting the Torontonians children and families who depend on our care.

Changes to age groups, adult to child ratios and group sizes are a major concern for us. These changes will impact the quality of our programs. The provincial government is proposing that these changes will create more access to child care for families. Packing younger children into larger groups with fewer staff doesn't create access; expanding, publicly-funding and sustaining more non-profit child care programs with enhanced ratios and affordable fees can.

The proposed changes to staff qualifications sets a precedent for future deregulation of licensed child care. In combination with larger groups of children and fewer adults will ultimately lead to accidents and serious occurrences. In same age groups, specifically kindergarten and school age, this would potentially mean that classrooms could have no qualified staff. Lessening qualifications will not help with recruitment and retention issues faced by our sector. There are already measures in place for child care directors to get approval from the Ministry of Education and our Service Managers to have non- Early Childhood Educators working in child care programs. There is no need to lessen staff qualifications. Instead, the provincial government needs to cooperate with the federal and municipal government to build a publicly-funded, universal child care system that values Early Childhood Educators through decent work and compensation.

The unlicensed child care registry is misleading for families and ultimately dangerous. This proposed registry would be voluntary and without oversight or accountability, all while giving families the false sense of security that the registry is vetted, regulated, and run by qualified

educators. This has been proposed in the past and was abandoned after several deaths of young children, here in Toronto, in unlicensed child care. This unlicensed registry would not provide families with access to child care, it would only give false validation to unlicensed, unregulated child care.

As a non-profit child care program, our priority is providing the best possible care and learning experiences for Toronto's youngest and most vulnerable citizens. We focus on being leaders who are actively involved in our community and in supporting the needs of the families we work with. These proposed changes do not meet the needs of the community and in many ways would be dangerous for children. We ask that you too, as our decision makers, oppose these regulatory changes in your response to the provincial government.

Thank you for championing for quality, accessible, affordable child care in Toronto. We look forward to working with you on building a better child care system for Torontonians.

Sincerely,

Neena Locke—BA, ECE, ECAd
Director
Red Apple Day Care