



November 10, 2020

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 Vicenta Tavares and I am the Supervisor at Oakwood Children's House. We are a modified Montessori program offering care to 16 preschoolers who are toilet trained and between the ages of 2.5 – 4 years of age. Additionally, we are located inside a TDSB public school and have been part of this community since 1978.

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 as our classroom does not have the washroom facilities for children who are two years of age and not toilet-trained. Additionally, children of this age require a lot more one-on-one teacher assistance and our ratios of 8:1 would be a great disservice to children this young as their needs will not be met as often as required. 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. This, 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,



Vicenta Tavares

Supervisor