



May 20, 2025

Mayor and City Councillors  
City of Toronto  
100 Queen St W,  
Toronto, ON  
M5H 2N3

Via email: mayor\_chow@toronto.ca et al

Dear City of Toronto's Mayor and Councillors:

**Re: Proposed "Access Zone" Bylaw Amendment (Item 2025.CC30.5)**

CUPE Local 2484 Toronto Childcare Workers Union represents 650 childcare workers and advocates at 38 childcare sites across Toronto, including those who work at a location in City Hall. We are writing to voice our strict opposition to the proposed "access zone" bylaw amendment that will be considered by the Toronto City Council between May 21st and 23rd, 2025.

Childcare workers are engaged in an ongoing struggle to obtain the decent working conditions, fair pay and professional respect that other groups of workers take for granted. We are predominantly racialized and working class women who are under-compensated and not properly recognized for the essential work we do, despite its foundational contribution to a healthy society.

CUPE 2484 members are among the city's residents who are most committed to supporting children's wellbeing, belonging and development. We understand that the basis for our ability to craft quality children's programs is formed from our conditions as workers and our quality of life in this city. This is why CUPE 2484 members are also among the most likely to protest at childcare centres. Our protests, strikes and other labour action are purposed at fighting for the very working and living conditions that will contribute most effectively to better childcare.

It is in the interest of everyone to protect and maintain our Charter rights to protest at all locations, including childcare sites, without fear of fines or charges. Parents and children are our usual collaborators on occasions of protest gatherings— people who also have vested interest in childcare and whose rights to confront the organizations they rely on should be respected and upheld.

Although we understand that this bylaw as proposed provides an exception for labour action, we can anticipate situations in which such a bylaw would interfere with collective bargaining rights.

Here is an example of potential interference: childcare staff on strike stage a "first day on the line" rally, where hundreds of members of the community come out to support them and show disapproval for the operator. The childcare operator then applies for an Access Area, which creates fear for the staff and members of the public, including parents with children at the centre, to join in picketing or further protests.



We do not believe that the City has thought through the implications of enforcement for labour action that does not take the form of a picket.

A blanket assurance to organized labour that our full rights to expression will be permitted is not adequate to attend to the overall restriction to all of our rights that this bylaw licenses and seeks to condition acceptance for. We don't agree that this bylaw can be made palatable by your agreement to respect Charter rights in the context of labour, or labour laws, as if these are more important than other focal points of rights.

We acknowledge that protests could occur at childcare centres for reasons of dissension other than working conditions, but it is our belief that TPS currently has sufficient means at its disposal to regulate any conduct that breaches existing laws, making this bylaw unnecessary.

It is also simply not the case that there is any evidence that childcare centres in Toronto are under attack or the subject of undue demonstrations that would indicate the necessity of this bylaw. We ask whether there have been any instances at all of protest-related access issues having been identified at a childcare centre?

Further to the status of the City's childcare resources and disposition of its community, we would like to know whether Toronto Children's Services was consulted in the development of this bylaw? It seems not to be the case as we have seen no commentary on it from any city official in this division. If they were, we would also ask to see their report, which should contain feedback from operators and workers on the matter. We are not aware of there having been any such community consultation process. Without it, we do not know why "access zones" for childcare centres are included in the bylaw.

In conclusion, we stress that this bylaw would only serve to stifle democratic engagement, and discourage equity-seeking communities from asserting rights, including childcare workers. It would have a chilling effect on protest as a means to confront powerful injustices at locations where they may be happening, which is not acceptable or defensible. The City should not rely upon children's safety as an argument for restricting everyone's rights to protest when there is no demonstrable threat to access or safety at childcare centres (or any other social infrastructure named in the bylaw, for that matter). We urge you to vote no on this proposed bylaw, and to move against any versions of it that are subsequently tabled in this or future meetings.

Sincerely,

Jess Tomas, RECE  
President  
CUPE Local 2484 Toronto Childcare Workers Union

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