

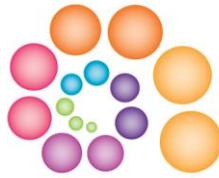
**Submission to the  
Ministry of Education, Early Learning Division**

**Modernizing Child Care in Ontario: Sharing Conversations,  
Strengthening Partnerships, Working Together**

**Submitted by:**

**College of Early Childhood Educators  
438 University Avenue, Suite 1900  
Toronto, ON M5G 2K8  
Tel: 416 961-8558  
Toll free: 1 888 961-8558  
[communications@collegeofece.on.ca](mailto:communications@collegeofece.on.ca)**

**September 24, 2012**



The College of Early Childhood Educators (the College) is pleased to provide its comments to the Ministry of Education, Early Learning Division in relation to the discussion paper entitled “Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together” released on June 27, 2012.

## **Background**

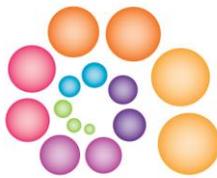
The College was established under the *Early Childhood Educators Act, 2007* (ECE Act). The College is a self-regulatory body that regulates the profession of early childhood education in the public interest. A transitional Council was appointed in August 2007 to establish the College during a transitional period, which ended on February 13, 2009. By Order in Council, the balance of the ECE Act came into force on February 14, 2009. The first elected and appointed Council took office on February 24, 2009. To date, the College has issued over 40, 000 certificates of registration to persons who have met the requirements for registration with the College.

The ECE Act sets out how the College regulates the profession of early childhood education. More specifically, the College’s objects include the following:<sup>1</sup>

- To regulate the practice of early childhood education and to govern its members.
- To develop, establish and maintain qualifications for membership.
- To provide for the ongoing education of members.
- To issue certificates of registration to members of the College and to renew, amend, suspend, cancel, revoke and reinstate those certificates.
- To establish an appeal mechanism for registration decisions.
- To establish and enforce ethical and professional standards that are applicable to members.
- To receive and investigate complaints against members and deal with issues of discipline, professional misconduct, incompetency and incapacity.
- To promote high standards and quality assurance with respect to early childhood educators and communicate with the public on behalf of the members.

---

<sup>1</sup> Section 7 (2) of the ECE Act



As a regulatory College with a specific mandate within the early learning and care sector, the College does not have a formal position on the areas of action that are related to the operating funding formula and capital funding priorities, except inasmuch as a stable, well-functioning early learning and care sector is more likely to be conducive to regulatory compliance. These two areas are not therefore directly within the scope of the College’s regulatory responsibility. Accordingly, the College will confine its submission to comments on the introduction and the remaining areas for action.

## **Discussion Paper - Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together**

### **I. Comments on Introduction**

The College agrees with the notion provided for in the discussion paper which states that “high-quality child care programs benefit children by providing enriching early learning experiences that promote future well-being”.<sup>2</sup>

The Ministry of Education’s oversight role over the College must ensure that the deference the College has been given to regulate the profession of early childhood education is carried out properly. This is accomplished by the College’s legislative obligation to report to the Minister on the activities and financial affairs of the College.<sup>3</sup> Furthermore, the College and Ministry of Education regularly meet to discuss key issues that are related to the requirement to have qualified early childhood educators working in all early learning and care settings.

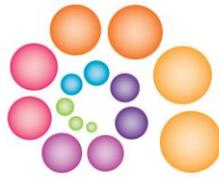
The regulatory functions and quality initiatives implemented by the College support professionalism in early learning and care, and include:

- Implementation of a registration process for the granting of a Certificate of Registration, which ensures members meet legislated entry to practice requirements.
- The establishment of the Code of Ethics and the Standards of Practice for the early childhood education profession.

---

<sup>2</sup> Page 2 of Discussion Paper- Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together

<sup>3</sup> Section 15(1) of the ECE Act



- The establishment of a formal complaints process whereby allegations of professional misconduct can be investigated.
- Various types of media are published on the College's website and distributed to stakeholders to ensure that the regulatory role of the College is communicated.
- The establishment of the College's mission, vision, values, and strategic priorities for 2012-2015.
- Regular engagement of members and other stakeholders about issues related to professional self-regulation.
- A dedicated email address to answer inquiries related to the practice of early childhood education.

The above-noted examples of regulatory activities and quality initiatives at the College and other examples which follow in this document ensure that early childhood educators employed in various settings across Ontario are accountable to the profession and are providing a high quality standard of care.

## **II. Areas for Action to Enhance the Quality Agenda**

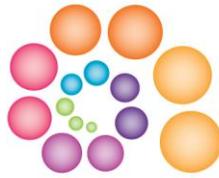
### **i. Quality Programs**

The College supports the government's stated objective of enhancing program quality and consistency over the next three years by developing mandatory provincial program guidelines for child care operators.<sup>4</sup> These provincial guidelines must recognize the College's role as the regulatory body for Ontario's early childhood educators, and the many ways in which the College promotes quality and professionalism.

The College's duty to protect the public interest requires it to make certain that only those who have met the educational and other requirements for registration with the College are eligible for membership. Furthermore, the ECE Act defines a scope of practice for early childhood education and requires a person who engages in the practice of early childhood education to be a member of the College, subject to certain exemptions.

---

<sup>4</sup> Page 10 of Discussion Paper- Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together



The foundation of quality programming is reflected in the definition of the “practice of early childhood education” in the ECE Act, which emphasizes the planning and delivery of inclusive, play-based learning and care programs to children.<sup>5</sup> It is the responsibility of members of the College and those who supervise early childhood educators to ensure that the ECE Act and its related regulations are complied with at all times.

The College believes that improved compliance with its legislation can be achieved by developing mandatory provincial guidelines that are aligned with the College’s regulatory role. These guidelines should reinforce the importance of play-based learning and the specialized skill set that early childhood educators bring to the sector, and should include a requirement for those who meet the registration requirements of the College to become members.

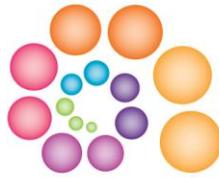
Two of the College’s recently developed strategic priorities will be of significance to the sector in terms of impacting quality in the long term and can be a source for provincial guidelines for child care operators in the future.

The first strategic priority focuses on considering a post secondary quality assurance mechanism for pre-service programs. The objective of this strategy is to ensure the consistency and quality of preparation of entrants into the profession of early childhood education. The second strategic priority focuses on implementing a continuous professional learning requirement that both supports member competency and encourages a culture of life-long learning. The achievement of both outcomes is a long term vision for the College.

It is important to note the proactive steps that are being taken at the College in order to make a more immediate impact on program quality. The College participated in the 2011-12 Ministry of Training, Colleges and Universities’ program standards review of the early childhood education stream offered by the Ontario Colleges of Applied Arts and Technology institutions. The College has requested that the concept of professional self-regulation be incorporated into the curriculum. The College is also making concerted efforts to reach Ontario’s early childhood education students prior to graduation so that awareness of the professional responsibility they have to their profession as a whole is instilled from the outset.

---

<sup>5</sup> Section 2 of the ECE Act



In terms of developing tools and resources for child care operators and parents, the College believes that all stakeholders should become aware of its public register of members, which can be found on the College’s website. The use of this tool helps to make certain that children are in the care of qualified early childhood educators.

The College also recently released its first Professional Advisory to build awareness and understanding around the use of the protected titles “early childhood educator” (ECE), “registered early childhood educator” (RECE) and their French equivalents.

Other tools that are available for child care operators and parents are Employer Bulletins and information pamphlets available in print and on the College website. Members of the College are also provided with a Wall Certificate of Registration. This certificate can be displayed in an early childhood educator’s place of work, assuring employers and parents alike that children are in the care of qualified professionals.

The College would like to note that developing additional resources for child care operators and parents is an important priority. The College will actively engage with members so that the purpose of self-regulation is communicated and shared responsibility towards practice excellence is achieved. Additionally, the College will reach out to audiences who have an interest in the work of the College, such as parents and employers, to ensure that they are knowledgeable about how the College acts to protect the public interest.

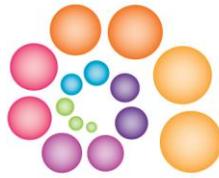
The College welcomes the opportunity to work collaboratively with child care operators and parents in order to provide for an exchange of information about the College’s regulatory role in Ontario. In particular, the College’s relationship with Consolidated Municipal Service Managers and District Social Services Administration Boards provides for an excellent opportunity to further this goal.

## ii. Modernized Legislative and Regulatory Framework

The College supports the position in the discussion paper stating that a review of the *Day Nurseries Act* (DNA) and its regulations is required so that the quality and safety of early learning and care programs are improved in the years to come.<sup>6</sup> From the College’s

---

<sup>6</sup> Page 11 of Discussion Paper- Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together



perspective, a review of the legislative framework must be focused on implementing those components that impact on quality in the early learning and care sector.

It is important that the DNA and its regulations are in alignment with the ECE Act by making the necessary amendments that recognize the College's regulatory role in Ontario. From the College's position as a regulator, it is important that the DNA and its related regulations recognize the educational requirements that must be attained in order to obtain licensure as an early childhood educator in Ontario and the obligation to maintain these qualifications.

This means that the structure of the DNA must account for the legislative framework found within the ECE Act. For example, a review of the DNA must consider incorporating the requirement in the ECE Act which states that persons who wish to use the restricted titles "early childhood educator" or "registered early childhood educator" or an abbreviation of those titles, must be members of the College.<sup>7</sup> Furthermore, membership in the College is also mandatory for any person who engages in the practice of early childhood education (as defined in the ECE Act) or who holds him/herself out as able to do so.<sup>8</sup> There are certain exceptions to this requirement, which are set out in the ECE Act.<sup>9</sup>

Additionally, the framework of the DNA must ensure that reference is made to terms such as the "*Code of Ethics and Standards of Practice*", "RECE", and "Certificate of Registration", so that the language of the College's quality mechanisms are made part of the overarching early learning and care sector.

The College also believes that, in addition to the alignment of the DNA and ECE Act, the *Education Act* should be similarly unswerving in its commitment to quality and professionalism in early learning and care settings.

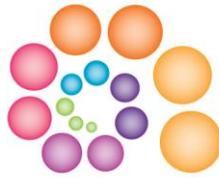
The changes noted above will not only protect the public interest by having registered early childhood educators in early learning and care settings, but will also provide for a consistent legislative framework that recognizes the regulatory role of the College.

---

<sup>7</sup> Section 4 of the ECE Act

<sup>8</sup> Section 3(1) of the ECE Act

<sup>9</sup> Section 3(2) of the ECE Act



### iii. Support for Accountability and Capacity-Building

The College supports the government's goal of developing a strategy that is focused on improving sector leadership and accountability measures.<sup>10</sup>

The College is aware of the fact that professional development opportunities are not readily available in the early learning and care sector for early childhood educators. The creation of the College provides for an opportunity to put the spotlight on continuous professional learning.

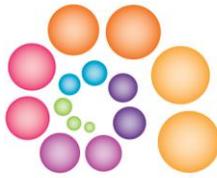
As noted previously, one of the College's strategic priorities over the next three years is to develop a continuous professional learning program that enables a commitment to professional learning from members throughout their careers. The College, in consultation with its members, will bring forward a regulation on continuous professional learning in order to implement its statutory duty to provide for the ongoing education of members. Efforts are currently being made by the College with the support of the government on this aspect of its regulatory role so that leaders in the sector are accountable to the profession of early childhood education and can set an example for those who are new to the field.

The College also supports developing more innovative methods of information gathering so that decision-making is supported by data and outcomes are better evaluated. The College is a resource through which data can be obtained from its members to support informed decision-making in the broader early learning and care sector.

Such information includes data about the career transitions of early childhood educators over a prolonged period of time. This information may be useful to the early learning and care sector as it could provide details on types of employment, opportunities for growth in employment settings, job satisfaction, and future plans in the field of early childhood education.

---

<sup>10</sup> Pages 14-15 of Discussion Paper- Modernizing Child Care in Ontario: Sharing Conversations, Strengthening Partnerships, Working Together



## **Conclusion**

The College appreciates the opportunity to provide this submission to the Ministry of Education, Early Learning Division on the topic of modernizing child care in Ontario.

Modernization of child care in Ontario is a vision that the College fully supports in the context of enhancing quality and professionalism in the sector. Operators and policy makers need to incorporate the regulatory regime of the College into the tools that are currently available and soon to be developed. Doing so will assist in creating quality programs that are led by professionals who have met specific criteria prior to entering the field and will provide support towards stabilizing the sector in the coming years.

The College would be pleased to provide any further information that would be of assistance to the Ministry of Education, Early Learning Division.