

April 1, 2016

Child Care Modernization  
C/o Early Years Division  
Ministry of Education  
900 Bay Street, 24th floor, Mowat Block  
Toronto, ON M7A 1L2

**Re: Regulatory Registry Consultation Document regarding the *Child Care and Early Years Act* and the *Education Act***

The College of Early Childhood Educators appreciates the opportunity to respond to the Ministry of Education's consultation document regarding proposed phase 2 regulations under the *Child Care and Early Years Act* (the CCEYA). Under the authority of the *Early Childhood Educators Act*, the College regulates the profession of early childhood education and more than 48,000 registered early childhood educators (RECEs) in order to serve and protect the public interest.

**B1 and B2. Licensing Clarity**

The College supports the proposed revisions to clarify the scope of exemptions from licensing, and the clarification that private schools within the meaning of the *Education Act* and camps do not fall under the "recreational, etc." exemption. The College also supports removal of the exemption for three hour programs serving children under the age of six years. By bringing such programs within the licensing requirement, the Ministry will be able to ensure appropriate numbers of qualified staff in these programs, which is critical, as RECEs play a key role in ensuring that programming is evidence-based and supports the health, safety and well-being of children.

**E2. Age Groupings, Ratios, Maximum Group Size, Qualifications, and Family Groupings (Child Care Centres)**

The College is concerned by the choice of language in the description of staff qualifications in section E2, which refers to the early childhood educator (ECE) diploma as comparable to diplomas in other areas such as child and youth care. As the Ministry is well aware, RECEs are not simply individuals with a diploma, but are members of a regulated profession, who practise in accordance with a Code of Ethics and Standards of Practice and have ongoing professional accountabilities, including mandatory continuous professional learning. It is important that regulations and communications emanating from the Ministry accurately portray the fact that early childhood education is a regulated profession in the province of Ontario. This is more accurately captured in the wording used in section G3 of the consultation document, which refers to membership in good standing with the College.

### **E2 (i). Age Groupings, Ratios, etc.**

The College supports the increase in the minimum number of qualified staff in the infant, toddler and preschool age groups.

The College has concerns regarding the proposed age ranges for the toddler and preschool groups. RECEs have professional obligations related to supervision, safety, and the delivery of developmentally-appropriate education. The proposed age ranges may impede RECEs in meeting the developmental needs of these children. In accordance with its mandate to regulate the profession of early childhood education in the public interest, the College recommends that the Ministry reconsider these age groupings.

### **E2 (iii). Reduced Ratios**

The College supports the prohibition on reduced ratios of employees to children for the infant and toddler age groups and the restrictions on reduced ratios during arrival and departure times for the preschool age group and other programs. Times of transition carry an increased risk of incidents related to child safety, and the proposed changes have the potential to improve the safety and well-being of children during these times. The College recommends that the Ministry address the issue of minimum numbers of qualified staff in relation to reduced ratios.

### **E3. Licensee responsible, E7. Children with Medical Conditions, and E11. Prohibited Practices**

The College supports the following proposals in the consultation document as consistent with the College's Code of Ethics and Standards of Practice and its *Practice Guideline: Supporting Positive Interactions with Children*:

- Licensees and supervisors will be responsible for the care or supervision of children;
- Development of an individual plan for each child with a medical need;
- The addition of prohibited practices such as physical restraint and any action that could result in bodily harm to a child;
- Specifying that children are not to be threatened or exposed to derogatory language; and
- Inclusion of sleep and toilet use in the definition of basic needs of which children must not be deprived.

We trust that the Ministry of Education will find this feedback useful when developing the phase 2 regulations under the CCEYA, and would be pleased to address any question related to this response, and to participate in any further consultation which may be undertaken.

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Yours truly,



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