

January 31, 2017

Honourable Indira Naidoo-Harris
Minister Responsible for Early Years and Child Care
77 Wellesley Street West, 12th Floor Ferguson Block
Toronto, Ontario
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Re: Consultation on Ontario's renewed vision for the early years

The College of Early Childhood Educators (the College) appreciates the opportunity to respond to the Ministry of Education's (the Ministry's) *Building a Better Future: A Discussion Paper for Transforming Early Years and Child Care in Ontario* (the discussion paper). We look forward to working with you and the Ministry, as contemplated in your September 2016 mandate letter from the Premier.

Under the authority of the *Early Childhood Educators Act, 2007*, (the Act) the College serves and protects the public interest by regulating the profession of early childhood education and more than 50,000 registered early childhood educators (RECEs) across the province.

The critical importance of quality

While the College acknowledges the importance of all four pillars proposed for the renewed policy framework – access, responsiveness, affordability, and quality – this submission focuses on the quality pillar. The College cautions that any increases in child care spaces should not come at the expense of quality.

Quality early learning and child care (ELCC) programs require quality staff. As a regulatory body, the College is responsible for ensuring quality amongst RECEs, but more can be done to enhance quality across the sector for the benefit of children and families.

Quality learning and care environments require qualified staff

A number of studies highlight that having qualified staff in the ELCC sector is critical for establishing quality learning environments and setting the foundation for children's success in the future.¹ As noted by the Organisation for Economic Co-operation and Development (OECD), "There is a general consensus, supported by research, that well-educated, well-trained professionals are the key factor in providing high-quality [early childhood education and care] with the most favourable cognitive and social outcomes for children."² Given the long-lasting, positive impacts that RECEs, as qualified professionals, have on children's outcomes, it is

¹ Whitebook, Mary. (2003). *Early Education Quality: Higher Teacher Qualifications for Better Learning Environments – A Review of the Literature*. Center for the Study of Child Care Employment, Institute of Industrial Relations: Berkeley, California.

Also refer to the other publications referenced in this submission.

² OECD. (2012). *Starting Strong III: A Quality Toolbox for Early Childhood Education and Care*. OECD Publishing. p. 144. http://www.oecd-ilibrary.org/education/starting-strong-iii_9789264123564-en.



important that children, families, and the public be able to recognize and understand the professional and leadership role of RECEs.

The renewed policy framework should better and more clearly define the ELCC workforce complement. As the Ministry is well aware, RECEs are regulated professionals who not only meet specified standards for registration (including education qualifications), but who are subject to ongoing obligations and oversight, including the *Code of Ethics and Standards of Practice* and continuous professional learning.³ Any dilution of the number and proportion of regulated professionals in ELCC environments will have a negative impact on quality.

Quality environments include both learning and care

To have quality learning and care environments, it is essential that both learning and care are promoted, addressed, and supported in the renewed policy framework so that the positive strides made with *How Does Learning Happen? Ontario's Pedagogy for the Early Years* are sustained into the future. As currently framed, the discussion paper emphasizes the government's commitment to introduce 100,000 new child care spaces over the next five years. As a result of the language used in the document, the focus has been placed on care, while early learning appears to have been de-emphasized. Care and education are inextricably linked – an infant is learning from the day it is born and at a much greater pace during its first three years of life than at any other stage of development.

The renewed policy framework should address both learning and care so that quality outcomes for child development can be realized. The combination and integration of both learning and care is so vital for child development that it is firmly established in the scope of practice statement for the ECE profession as set out in s. 2 of the Act. In this regard, it is important for families and the public to recognize and understand the specialized qualifications and competencies that RECEs have to integrate and provide both learning and care in early years programs.

Quality depends on a strong regulatory framework of accountability

The College anticipates that there will be workforce implications in the creation of 100,000 new child care spaces, and cautions against any measure that may negatively affect the professionalism and accountability of those entrusted with the care of Ontario's youngest learners.

At a minimum, the College recommends that any individual working in the place of an RECE (e.g., individual working under Director Approval in a licensed child care setting or a Letter of Permission for DECE positions in school boards, etc.) be regulated by the College and subject to the same requirements and accountabilities to practice in accordance with the *Code of Ethics and Standards of Practice* as RECEs.

³ The College previously shared these concerns with the Ministry in its submission to the Ministry's consultation in April 2016 regarding the *Child Care and Early Years Act* and the *Education Act*. A copy of the College's submission is posted on its website at https://www.college-ece.ca/en/Documents/cceya_regulation_phase_2.pdf.



Doing so would ensure that expectations for practice are consistent and would help to eliminate confusion. Importantly, children and families would be afforded the same protections and access to the same recourse mechanisms through the College for practice, safety, and conduct concerns and other issues.

The College recommends that the Ministry also consider the appropriate qualifications and regulatory standards for all practitioners in the ELCC sector. The College is open to partnering with the Ministry to explore opportunities in this regard. Indeed, the Expert Panel on Quality and Human Resources recommended that education requirements and practice standards be established for all early learning and care practitioners and recognized the College as being key in this work.⁴

Quality relies on meaningful engagement in professional development

Ongoing self-reflection and professional development are accountabilities of all regulated professionals, including RECEs. The College's mandatory Continuous Professional Learning program requires RECEs to reflect on their practice, professional growth and leadership development within the context of the profession's ethical and professional standards. Ongoing learning is paramount given the substantial transformation underway in the ELCC and broader children's services sectors.

For quality practice to be sustained and positive outcomes for child development realized, those who care for and educate the youngest across our province must keep abreast of changes and have the structures and supports in place so they can meaningfully engage in professional development that will support them to effectively manage the increasingly complex demands of their practice.⁵

We trust that you and the Ministry will find this feedback useful when developing a renewed vision for the early years, and would be pleased to address any questions related to this response and participate in further discussions on the matters raised herein. We remain committed and look forward to partnering with you and the Ministry on the shared goal of serving and protecting Ontario's children and families of today, tomorrow and beyond.

Sincerely,

Beth Deazeley
Registrar & CEO
College of Early Childhood Educators

⁴ Expert Panel on Quality and Human Resources. (March 2007). *Investing in Quality: Policies, Practitioners, Programs and Parents*. Author: Ontario. pp. 40-44.

⁵ The OECD notes that lack of funding for staff training "might seriously affect ECEC quality, and with this, child development outcomes, since staff are not being optimally trained or educated to stimulate early learning and development." OECD. (2012). *Starting Strong III: A Quality Toolbox for Early Childhood Education and Care*. p. 145.



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