



## **Bill C-35, An Act respecting early learning and child care in Canada**

**Written Submission to the House of Commons Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities**

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*Building healthy  
communities*

**YMCA Canada**

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## Introduction

On behalf of YMCAs in Canada, we thank the Government of Canada for its leadership in Canada's recovery following COVID-19. As Canada's largest non-profit provider of licensed child care, the YMCA applauds the Government of Canada for recognizing the essential role of child care in the economy, an equitable recovery for women, and positive outcomes for children.

YMCA Canada is pleased to contribute to the HUMA Committee's study on Bill C-35, An Act respecting early learning and child care in Canada. Our submission reflects our experience in delivering high-quality early learning and child care for more than 50 years. We would be pleased to further discuss our recommendations and can be contacted directly.

## About YMCA Early Learning and Child Care in Canada

Across Canada, the YMCA has more than 88,300 licensed infant, toddler, preschool, and school-age spaces at 1,250 program locations. Through our early learning and child care programs, we nurture the development of over 61,500 children of all backgrounds and abilities each year.

Our acclaimed national curriculum, YMCA Playing to Learn™ (up to age 6) and YMCA A Place to Connect™ (ages 5-12), is grounded in research on the best ways for children to learn. It provides a unique platform for the professionalization of educators through annual evaluations of every YMCA centre across the country. Research-based, it aligns with provincial regulations and is regularly and rigorously evaluated and practically informed by the feedback of families and educators. Our 9,900 child care staff and educators are highly trained and accountable for implementing our curriculum and adhering to the YMCA's national child safety and protection standards.

## Position and Recommendations

For decades, YMCAs have known accessible, affordable, inclusive, and high-quality child care is essential to child development, positive family outcomes, gender equity, poverty reduction, and the strength of our economy. **The YMCA is in full support of Bill C-35 and is a committed partner in realizing the Canada-wide early learning and child care system.**

- **Funding:** The YMCA applauds the federal commitment to sustained and ongoing funding to ensure that child care is affordable, accessible, inclusive and high-quality across Canada. We would further recommend within Bill C-35, funding be explicitly described as annualized, and tied to the licensed, regulated system of child care, which includes centre-based and home-based child care.

We would also welcome mechanisms to ensure child care funding remains predictable, sustainable and sufficient in each province and territory based on the needs and objectives of the CWELCC agreements. Finally, funding provided to operators must reflect the true costs of providing high-quality, accessible, and inclusive care and include suitable inflationary increases as part of the funding formula.

- **Early Childhood Education Workforce:** The success of the CWELCC plan will not be possible without a well-trained and compensated Early Childhood Educator (ECE) workforce. With ambitious expansion targets set across Canada, tens of thousands of new educators will be required to implement the plan. At Ontario YMCAs alone, the following workforce shortages are being reported:



To meet current registrations	419
To return to pre-COVID operating capacity	1,427
To move to licensed capacity	2,869
To expand beyond licensed capacity by 20%	3,442

Without a dedicated pipeline of new ECEs, Canada will not be able to meet demand or fulfill the expansion goals within the CWELCC agreements.

We believe there is an opportunity to strengthen the language within the Act to recognize the federal government’s leadership and role in supporting our essential ECE workforce. This could include principles for collaboration and sustained investments in a national strategy that includes recruitment, retention, (re)training and recognition of the ECE workforce.

Additionally, this could include federal leadership in establishing national standards for wages and national education/accreditation standards, which includes foreign credential recognition, that supports high-quality programs; working collaboratively with the provinces and territories to increase capacity within Canadian early childhood education programs and support express entry of newcomers interested and able to work in the Canadian child care system; and exploring interprovincial early childhood education/accreditation mobility and recognition across Canada.

- **Accountability and public reporting:** The YMCA welcomes the commitment within the proposed Act to enhance accountability through an annual federal public report on progress toward an early learning and child care system. Establishing key performance indicators to measure the current system against desired outcomes will allow for early intervention in areas where improvement is needed.

We would further recommend that the Act commits to supporting Canadian-based early learning and child care research across a range of disciplines, methodologies, approaches and question types. Meaningful efforts to address the lack of Canadian research in critical areas, including examining non-profit child care in Canada, and early learning and child care for subpopulations, such as immigrant children, children from official minority language communities, and Indigenous children are essential to meeting the objectives of CWELCC.

Finally, we recommend reinforcing the Government of Canada’s priority of licensed, regulated, non-profit early learning and child system expansion, accountability, and oversight within Bill C-35.

- **National Advisory Council:** The YMCA supports the establishment of the National Advisory Council on Early Learning and Child Care and enshrining this advisory body into law. We would welcome additional, ongoing, formal, and informal methods to ensure that federal policies, positions, and funding commitments related to CWELCC are informed by the expertise and experiences of child care program providers like the YMCA, as well as all levels of government and families.
- **Equity and Accessibility:** The YMCA supports declarations and guiding principles within Bill C-35 that speak to equity, inclusion and accessibility as a priority for the Canada-wide early learning and child care system. Additionally, we support the acknowledgement that First Nations, Inuit and Métis children and families are best supported by early learning and child care programs and services that are culturally appropriate and that are led by Indigenous peoples.



To realize an inclusive, equitable and accessible Canada-wide system, we recommend defining “varying needs” as referenced throughout the legislation, to be inclusive of socio-economic needs, geographic needs (rural, urban, etc.), cultural and diversity needs, a child’s developmental and identified special needs, etc.

To assist children of all backgrounds and abilities, curriculum activities, as well as program structure and conditions, must be adaptable, equitable, and inclusive. For example, incorporating culturally-specific content and providing opportunities for children and families to participate in their first language, respects and affirms diversity, cultivates a sense of belonging, and supports the development of positive self-identity.

### Additional Considerations

The YMCA welcomes the announcement of an Early Learning and Child Care Infrastructure fund in Budget 2022. The establishment of this \$625 million Fund is a significant opportunity to support the construction and renewal of indoor and outdoor child care facilities in communities across the country. While the construction of new facilities is essential to expansion, there is a pressing need for investment in capital renewal today and in the future. Opportunities to expand the Fund to support 100% of the child care capital development and renewal costs should be pursued. Furthermore, the implementation of the Fund and any subsequent bilateral agreements with the provinces and territories should be closely aligned with and reflect the principles and objectives within Bill C-35.

Early learning is part of an integrated system with education and before- and after-school care programs. We feel it’s important to acknowledge that learning and development does not stop at age 6 and families need support managing the high cost of before- and after-school care for their older children. We encourage the federal government to work with before- and after-school program providers and all levels of government to ensure families with children ages 5-14 have access to high-quality care that is accessible, affordable and inclusive.

### Conclusion

Thank you for the opportunity to provide perspective on Bill C-35. The YMCA is in full support of this critical piece of legislation, which ensures the federal goal, vision and principles for the Canada-wide early learning and child care system are sustained and protected into the future. We look forward to continuing to work together with all our government partners to realize this transformative system for children and families.

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