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**Written Submission in response to Bill 8: An Act to Amend Chapter 44 of the Acts of 2005, the Pre-primary Education Act, to the Law Amendments Committee, October 4, 2017**

The amendments being proposed to allow for the government to roll-out the pre-primary programs across the province are too wide-open. There is clear evidence that continuing to subsidize for-profit child care is not supporting our families and our children in the ways that they need it. The government needs to stop subsidizing for-profit providers who charge on average 21% higher fees than non-profits. All current centres should be offered the opportunity to become public centres if they wish to receive public funding. The profit motive should be taken off the table in early learning and child care.

The sudden child care closure on a Friday afternoon of a for-profit child care centre left parents scrambling to figure out what to do come Monday morning (given that it offered services for 92 children, this affected a lot of families). The owner had been trying to sell the business for a while. **Child care should not be for sale.** Families deserve a reliable system of quality child care where they are not having to trade-off the kind of quality care they want, provided by qualified staff earning a decent living wage, at a cost they can afford in the community they live or work in.

We applaud you for following the evidence that universal early learning and child care programs are the best way forward. Targeted programs are inefficient and create stigma for users whereas universal programs bring together everyone in the community and can build connections across income levels, cultural groups, and family types. This investment is long overdue.

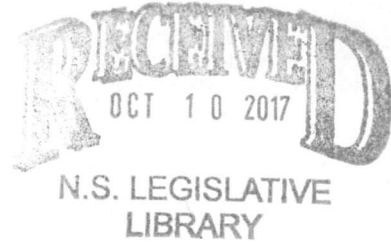
We are disappointed however that the way the current program is rolling out means that working families are scrambling to figure out child care before and after school and during any in-service days, March break, summer holidays, etc. The cost to cover the actual care hours needed for parents in the workforce (80% of families in Nova Scotia) will still be upwards of \$5,000, cutting in half the government's estimate of what families would save as a result of this program announcement.

Current non-profit providers are struggling to deliver infant and toddler care, which is more expensive because it requires more educators per class than for preschoolers. Families who need care for children under 18 months cannot find it—in Halifax only 9% of regulated spaces are for infants, and toddler and preschool spaces make up 34% and 57% respectively. The government can begin building a system to grandparent in current centres and expand what is available for those under the age of 4 in a range of locations and settings.



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We are glad that the government is acting on the evidence about the developmental benefits of early learning and child care. However, school readiness is an important consideration, but not the only one. A well-designed early learning and child care system supports families in all the ways they need it.

The province's last child care review, identified infant and rural access gaps as dire. Those should be a priority.

Adequate governance and accountability measures must be in place. The government has said that school boards will decide wages, but won't actually govern these programs. So, although programs will be in schools and subject to the school's health and safety regulations, they will not be administered by principals. What does this mean for working conditions? Currently, child care centres have directors and the non-profits have boards that provide parents with some accountability. Is appointing a lead educator sufficient to ensure accountability in this new model? Who will do the appointing? These are a critical piece of rolling out a legislative framework.

This pre-primary program needs to be part of a plan to build a quality, evidence-based, universal early learning and child care system. To do so would require ending the patchwork of programs, including the inadequate subsidy program for families (one of the lowest in the country). The government needs to roll the various funding into one envelope out of which a comprehensive system could be systematically built. Without this, parents will still be left scrambling to find child care, no matter the age of their children, let alone care they can afford with (median) fees of \$900 per month.

We need a funded transition plan, created in collaboration with researchers, early childhood educators, and parents, to develop a full system for all children in Nova Scotia. This plan must include a workforce strategy that deals with the currently inequitable compensation and working conditions, as well as funding to support infant and toddler care. Without dedicated funding for a transition plan, providers will struggle to recruit and retain staff, raising the very possible risk that parents will lose access to care for those under the age of four and wrap around care for school-aged (before, after-school, summer).

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