Parliamentary Brief Submission:
Bill C-35, An Act respecting early learning and child care in Canada

Presented to:
Standing Senate Committee on Social Affairs, Science and Technology

Submitted by:
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CFUW-FCFDU is a national, non-partisan, self-funded organization with 94 clubs across Canada and over 6,600 members. Our mission is to achieve educational and economic equality and social justice through continuous learning and empowerment. Our vision is that women and girls are educated and empowered to make transformative change in the world.

Our organization has a long history of advocating for quality, universally-accessible, and comprehensive early learning and child care. We have long known that affordable and accessible child care is an essential element in achieving gender equality in the workforce and in society. Indeed, the 1970 Report of the Royal Commission on the Status of Women in Canada recommended the creation of a publicly-funded child care system, stating that “the care of children is a responsibility to be shared by the mother, the father, and society. Unless this shared responsibility is acknowledged and assumed, women cannot be accorded true equality.” 53 years later, women continue to bear disproportionate child care responsibilities, and their careers, societal participation, and personal wellbeing are often negatively affected as a result.

The evidence is clear that universal access to child care has a large impact on women’s workforce participation. We have already seen this play out in Quebec, where the introduction of an affordable child care program in 1997 "significantly increased the labour force participation and annual weeks worked for mothers with at least a child aged 1 to 4 years compared to mothers in the same situation in the rest of Canada” (Lefebvre, Merrigan, and Roy-Desrosiers, 2010). Thus, in addition to being incredibly beneficial for children and their development, affordable and accessible early learning and child care programs are of remarkable value for Canada’s women and the economy to which they contribute.

As we shared in our written submission to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities (HUMA), we are extremely pleased to see legislation that enshrines the government’s commitment to long-term funding for a Canada-Wide Early Learning and Child Care (CWEELCC) system. We are glad that the legislation outlines guiding principles for the system that indicate that early learning and child care programs and services should be accessible, affordable,
inclusive, and of high quality. Accordingly, CFUW-FCFDU urges the swift passage of Bill C-35.

HUMA introduced several amendments that greatly improved Bill C-35 and addressed some of the concerns we outlined in our written statement to the committee. **We recommend that all amendments are retained.** In particular, CFUW-FCFDU is supportive of the following amendments:

- The addition of “respect the right of Indigenous peoples to free, prior and informed consent in matters relating to children” in Clause 6 (e)
- The addition of “support the provision of, and facilitate equitable access to, high-quality early learning and child care programs and services” in Clause 7 (1)(a)
- The change from “enable families of varying incomes to benefit” to “enable families of all income levels, including low incomes, to benefit” in Clause 7 (1)(b)
- The addition of “including in rural and remote communities, of early learning and child care programs and services that are inclusive of children from systematically marginalized groups, including children with disabilities, and of children from English and French linguistic minority communities” in Clause 7 (1)(c)
- The addition of subsection (1) and (2) to Clause 16 regarding the Annual Report, outlining more detailed reporting and tabling requirements to which the Minister must adhere

CFUW-FCFDU especially welcomes the added language surrounding the “recruitment and retention of a qualified and well-supported early childhood education workforce” in the bill’s Guiding Principles. The success of the CWELCC system rests largely on the Early Childhood Educator (ECE) workforce being not only large enough, but adequately supported and rewarded for their indispensable work.

Due to traditional gender roles and stereotypes, child care remains a woman-dominated sector. As care work is still largely viewed as “women’s work,” the legacy of historical undervaluation of women’s work—racialized women’s work especially—continues, with care work often being underpaid and under-supported. To ensure quality care, ECEs need to be provided with quality working conditions, including salaries above a living wage according to a wage grid (with adjustments for areas with high costs of living), benefits, and reasonable child-to-staff ratios to avoid burnout and ensure retention. **We would**
like to see the federal government pursue a national strategy on recruiting and retaining ECEs, and to take a lead role in funding and implementing the strategy.

Additionally, we share other organizations’ concern regarding the lack of a definition of early learning and child care in Bill C-35. In the absence of a set definition, early learning and child care could be interpreted to encompass unregulated and informal forms of care. To ensure clarity and certainty, and minimize any future threats to the CWELCC system, **we recommend a definition of early learning and child care be added to Clause (2) of the bill.** This definition should reflect that programs and services are to be licensed and/or regulated by provincial or territorial governments or Indigenous governing bodies.

Lastly, CFUW-FCFDU stresses that robust data will be critical in monitoring the implementation and outcomes of the CWELCC system. **We recommend disaggregated data be collected about families accessing child care across Canada.** This data is necessary to ensure the system is truly inclusive, equitable, and accessible for families of all incomes and backgrounds, and to identify areas where these essential outcomes are not being achieved. We also encourage the collection and dissemination of data that captures the multifaceted impacts the CWELCC system has on women and the economy. Particularly in light of the amendment that services and programs are to be “reflective of other evidence-based best practices in high-quality service provision,” adequate quantitative and qualitative evidence must be readily available to inform all aspects of the program.

In summary, CFUW-FCFDU is pleased to support Bill C-35. While affordable and accessible child care is by no means the sole means to achieve gender equality, it is an invaluable step towards this ultimate goal. We make the following recommendations to strengthen the legislation and CWELCC system:

1. Retain all amendments made to Bill C-35 to date.
2. Add a definition of early learning and child care.
3. Introduce provisions for a national strategy on recruiting and retaining ECEs.
4. Introduce provisions to collect disaggregated data on families accessing child care.