



**Inclusive Early Learning and Child Care:
Why is including children with disabilities
still considered optional?**

Submission to the Federal Secretariat on Early Learning and Child Care

Department of Employment and Social Development

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Introduction

Inclusion BC is a non-profit provincial organization advocating for the rights and opportunities of children, youth, and adults with intellectual and developmental disabilities and their families to live and participate as full citizens in their communities. We are supported by a federation of members consisting of people with disabilities and families, 62 member organizations, and five affiliate organizations, all working together to build inclusive communities across British Columbia.

Nearly a third of our organizational members provide child care services or support through the provincial Aboriginal Supported Child Development or the Supported Child Development Programs (A/SCD). The A/SCD programs offer consulting and support services so that children with disabilities or extra support needs can be fully included in child care settings if the funding allows for that.

Inclusion BC provides individual and family advocacy support through our Community Inclusion Advocacy program. In 2023-2024, 48% of the calls for support were about barriers to access inclusive education, including child care and before and after school care.

We welcome the opportunity to share our views and experiences to inform the work towards building a Canada-wide Early Learning and Child Care System. The work of our federation members and the support we provide to families give us a good understanding of the challenges and opportunities to improve access to child care for children with disabilities in British Columbia.

Our submission addresses some of the core questions outlined in the Discussion Guide, specifically focusing on the experience of children with disabilities and their families. We affirm that an inclusive Early Learning and Child Care system must explicitly address disability inclusion to offer equitable access to all children.

Background

One in seven children in B.C. were living in poverty in 2021, with child poverty rates expected to continue increasing. Caring for a child with disabilities increases the likelihood that a family will live in poverty. One of the most critical factors that impact the inclusion of children with disabilities and the income security of their families is whether they have access to inclusive early learning and child care, including before and after-school care. According to the [2023 BC Child Poverty Report Card](#), children with disabilities are turned away from child care programs because the programs often lack the capacity to support the children's needs. Families are prevented from joining the workforce without affordable and inclusive child care, and children of all abilities are missing foundational opportunities to grow and learn about diversity.

Recent efforts by the provincial government have focused on reducing child care costs and creating more inclusive spaces; however, families continue to face long wait lists and lack child care support within their communities. B.C.'s [2024 Poverty Reduction Strategy](#) acknowledges that high-quality, accessible, inclusive, and affordable child care is a key factor in reducing poverty by allowing parents and caregivers to access employment, schooling, and training opportunities.

Inclusion BC has actively participated in engagement processes with the provincial ministry on inclusive child care. In June 2024, the provincial government released [Where All Children Belong: B.C. Inclusive Child Care Strategy](#), setting a definition of inclusive child care that incorporates several elements that Inclusion BC would like to see become a reality:

"Inclusive child care means that children of all abilities and backgrounds, including neurodiverse children, children with a disability and children with other support needs have equitable access to quality child care. Inclusive child care recognizes the individual strengths and inherent gifts of each child, and all children are supported to belong and learn through play along with other children in a child care program of the family's choosing."

The strategy further considers equity of access and culturally safe child care, which are also fundamental to an inclusive system.

Universal design principles must be part of the early learning and child care system. This is not just a beneficial approach; it is a fundamental necessity for fostering an inclusive environment where all children can thrive. By integrating universal design

principles, we ensure that every child has the same opportunities for growth, learning, and social interaction regardless of their abilities. This inclusive approach not only supports the diverse needs of children with disabilities but also enriches everyone's overall child care experience. When child care settings embrace universal design, they cultivate a culture of acceptance and equality, setting the stage for a more compassionate and equitable society.

To meet the goal of inclusive early learning and child care, all levels of government must ensure that laws, policies, budgets and practices work together to uphold [Article 24](#) of the UN Convention on the Rights of People with Disabilities to fully realize the right to inclusive early learning and education without discrimination and on the basis of equal opportunity.

Questions

What does access to high-quality, affordable, flexible, and inclusive ELCC mean to you?

Access to high-quality, affordable, flexible, and inclusive early learning and child care means that children of all backgrounds and abilities can find child care spaces with same-age peers in their communities, with support or accommodations that ensure equitable opportunities for all children to learn, contribute, participate and experience belonging. This requires the design of spaces, programs, and activities so that all children can participate and learn together.

1. **Accessible:** The programs are designed to be accessible to all families, regardless of their location, income level, or specific needs. An inclusive early learning and child care program ensures that every child has equal opportunities to engage in all aspects of care, including all learning activities and experiences.
2. **High-Quality:** The programs offer excellent education and care standards, including well-trained staff, a stimulating curriculum, and a safe, nurturing environment. This ensures that children receive the best possible start in their development and learning.

3. **Affordable:** The cost of child care and early education is reasonable and manageable for families, reducing financial barriers and making it accessible to a broader range of income levels.
4. **Flexible:** The programs offer adaptable hours and services to accommodate different family schedules and needs, such as varying work hours or special requirements.
5. **Inclusive:** The services are designed to be accessible to all children. This includes accommodations and considerations for children with disabilities, those from different cultural or linguistic backgrounds, and families with varying socio-economic status.

As Inclusion Canada has expressed:

"Inclusion involves systemic reform embodying changes and modifications in content, teaching methods, approaches, physical environments, structures, and strategies to enable learning and belonging for all."

What do you think a successful Canada-wide ELCC system looks like?

A successful Canada-wide ELCC system is based on solid principles that can guide coordinated actions among all levels of government. For this purpose, one crucial step is to define inclusion in the regulations in alignment with the UN Convention on the Rights of Persons with Disabilities in these terms:

Inclusion is defined as not discriminating based on location, gender, race, sex or ability and means a responsive environment where all children have equitable access from a whole system approach, including the timely provision of needed supports to meaningfully and equally participate in the regular routines of the learning environment, including child care, and are immersed with their peers regardless of abilities, diversity, identities or characteristics, enabling equal access for all.

A successful system is responsive to a wide range of diverse family needs and meets the standards of accessible, high-quality, affordable, flexible, and inclusive, as defined in the previous question.

What challenges do you, your community, and/or your organization experience in accessing affordable ELCC?

Based on the experience of our federation members and the trends identified from the calls supported by our Community Inclusion Advocacy program, these are some of the challenges that families experience in accessing early learning and child care in British Columbia:

1. **Limited access to child care spaces** – the creation of new child care spaces is not growing at the pace the communities need to have enough spaces for all the children who require child care. The challenges are more significant in rural and remote communities.
2. **Exclusion of children with disabilities** – children with disabilities have more limited options than the rest of the children in the province since child care centres can deny or terminate enrolment if they don't have the resources (human, financial, or knowledge) to support a child with a disability.
3. **Long waitlists to access the Supported Child Development Program (SCDP)** – this is the current mechanism in B.C. to support the inclusion of children with disabilities by providing consulting or additional staff. Since child care centres do not have a legislated mandate for inclusion, they can deny access to a child with a disability if they don't have additional funding from the SCDP.
4. **Affordability** – while the \$10 a day program keeps growing in B.C. and the BC Affordable Child Care Benefit supports some families, for many others, the cost of child care is beyond their reach or negates their income if most of it goes to pay for child care. Some children with disabilities are subject to higher fees because of their disability, creating additional inequity and perpetuating disability poverty.
5. **Lack of adequate support for children with medical complexity** – Nursing Support Services, the provincial program that provides training to support the inclusion of children with medical complexity, stopped providing this training to child care centres. The regional health authorities haven't filled the gap, and this has resulted in the full exclusion of a group of children solely on the basis of their disability and support needs.
6. **Lack of child care options for children with disabilities over age 12** – the support needs of children with disabilities don't end as they grow; they

change. Families whose children outgrow the typical child care age have limited or no options in their community. This forces parents to leave the workforce, or their children don't have safe or age-appropriate child care opportunities as they grow older.

7. **Training and workforce** – post-secondary programs do not offer sufficient training in inclusive practices in their core curriculum, and there are limited options for early childhood educators to access specialized training after completing their certificate. There is already a shortage of early childhood educators in B.C., and more so, to find people with training in inclusion.

What priorities would you, your community, and/or your organization like to see addressed by the Canada-wide ELCC system?

The Inclusion BC federation would like to see a Canada-wide system that includes policies and actions that make access to high-quality, affordable, flexible, and inclusive early learning and child care a reality for children with disabilities, such as:

1. Establish in federal and provincial laws and regulations a **definition of inclusion** that aligns with the UN Convention on the Rights of Persons with Disabilities as outlined in question 2.
2. A clear **legislated mandate** for inclusion in all early learning and child care programs. Equitable access to early learning and child care as a core requirement must be part of the legal framework at all levels of government.
3. Include **targeted investments** to support the inclusion of children with disabilities in provincial and federal regulations and bilateral agreements. The outcomes should be tied to indicators that demonstrate the full inclusion of children with disabilities through:
 - a. Direct funding to support inclusion.
 - b. Training and ongoing workforce development for inclusion.
 - c. Access to specialists and resources for inclusion available for all child care centres.
 - d. Establish licensing regulations with ratios that support inclusion and requirements to protect children with disabilities against discrimination.

4. Define clear **oversight structures** at the federal and provincial levels to ensure an independent legislated body protects children's rights, including jurisdiction over education, early learning, and child care. For example, in B.C. the Representative of Children and Youth currently doesn't have jurisdiction over education or health.

Do you have ideas on how the federal government could support the ELCC workforce?

The bilateral agreements have opened opportunities for the federal and provincial governments to take action toward strengthening the early learning and child care sector. By establishing **targeted investments in the bilateral agreements** on the following aspects, the federal government can ensure there are measurable ways to support the ELCC workforce:

- **Training**
 - Increase the number of spaces in post-secondary programs and specialized training certificates.
 - All early childhood education programs include foundational skills to support the inclusion of all children in every early learning and child care space.
 - Access to financial support for people to access training in rural and remote areas to secure growth in the workforce across the provinces.
- **Competitive compensation**
 - Establish a comprehensive strategy to improve the recruitment and retention of early childhood educators that addresses compensation and working conditions.
- **Access to specialists and resources to support the inclusion of all children**
 - Early learning and child care centres have access to specialists and resources when they need them to expand their knowledge and support the inclusion of all children.

How can we collect better data about the ELCC needs of children and families from diverse populations in ways that empower these communities?

One of the critical limitations in making informed policy decisions to improve the early learning and child care system is the lack of coordination of existing data and research done on the inclusion of children with disabilities.

Resource planning and service delivery must be based on needs. Without a collaborative approach to collecting and analyzing data, waitlists are only maintained at the local level, preventing a comprehensive provincial or federal strategy from emerging.

The federal government needs to work with provincial and territorial partners to break down the silos on disability-related data collection. In British Columbia, the collaborative approach to sharing data should include the Ministries of Children and Family Development, Education and Child Care and Health.

Formal evaluation of the reported outcomes in the bilateral agreements is necessary to ensure that federal, provincial and territorial governments achieve the goal of an inclusive early learning and child care system.

Funding independent research on existing and new approaches to early learning and measuring their effectiveness for inclusion would promote an evidence-based approach to continuously improving a Canada-wide early learning and childcare system that will meaningfully benefit all children.

Empowering children with disabilities and their families must start with a clear understanding at all levels of service and government that their inclusion is not optional, and they don't have to advocate for it. The premise of recognizing the right to inclusive early learning and child care in our laws and policies is grounded on the expectation that when a child with a disability registers and shows up at their early learning or child care centre they are fully welcomed and supported to stay like the rest of their peers.