

June 28, 2012

Dear Honourable Minister Broten,

Kids First Parent Association of Canada is a national charity concerned with children's optimal care and well-being run by volunteer parents since 1987. Our website is www.kidsfirstcanada.org . We are independent, non-partisan and non-sectarian.

We are writing regarding the recently announced consultation on child care.

The consultation paper speaks of "putting children and families first". However, this is contradicted by both the content and the process. Clearly children and families interests are not the priority at all.

We are concerned:

- 1 - that parental child care and early learning is not being considered at all.
- 2 - that non-parental child care and early learning is being limited to institutional settings and especially to such settings in schools.
- 3 - that the consultation was announced just as summer holidays begin; such timing appears to be intended to minimize participation by parents - especially those not directly connected to daycare centres - in the consultation.
- 4 - that the deadline of September 24 means that this is limited to a summertime consultation which will minimize awareness of, organization around, and participation in this consultation.

We urge you to:

- 1 - extend the deadline to December.
- 2 - include equitable funding for parental child care.
- 3 - include non-parental child care forms that are not institutional settings in schools or otherwise.
- 4 - use only peer-reviewed research as "evidence" for policy formation rather than publications by advocates of non-parental and institutional early learning and care. We can provide a number of these and provide the names of qualified experts specifically qualified in the areas of economics and child development. You rely on the report by Charles Pascal which is based on non-peer reviewed reports by advocates for institutional child care, and treats peer-reviewed research highly selectively and includes numerous inaccuracies - even "gross

misrepresentation" (Dr Kevin Milligan UBC economics) - of the peer-reviewed research.

5 - respect children's right under the UN Convention of the Rights of the Child and the Charter to security of person: this endangered by preferentially funding institutional care as this is the care form empirically demonstrated to lead to worse behavioural and health outcomes.

6 - respect children's and parents' Charter-protected rights to equality before the law by adopting a policy of government neutrality on child care forms and cease preferential funding of non-parental child care; fund families directly to meet children's child care and early learning needs.

7 - respect children's right under the UN Convention of the Rights of the Child (Article 7.1) "to be cared for by his or her own parents".

8 - abandon the Pascal report and plan; investigate the misrepresentation, selection bias, and falsification of evidence in his reports; take legal action against those involved with the misrepresentation, selection bias, and falsification of evidence in his reports; and publicly apologize for the costs to children, parents, and taxpayers of following this grossly misguided and harmful agenda.

There is a great deal at stake here: children and parents are suffering under this policy agenda. The reliable evidence predicts long term negative consequences for individuals, families, and society.

We urge you to give serious consideration to these concerns and revise the consultation and policy to genuinely "put children and families first".

Sincerely,

Helen Ward

President,
Kids First Parent Association of Canada

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