

COMMENTS

Process

- ❖ We are concerned that this consultation is being conducted in an undemocratic manner, and especially that it is excluding the vast majority of parents.

This is because the consultation:

- is being conducted in the summer when parents are not accessible through the school system, and/or are away
- was launched without a public info campaign – such as posters where parents especially could see them; or notification to parents via schools; or mailed notices in, for example, utility bills; or a general mail out to the public (compare this silence to the publicity around the government’s “green” initiatives)
- was initially launched without even a press release
- has a short time frame for input into such a major policy discussion
- contains a list of groups invited to participate which has only one parents’ group. Not even PAC groups are listed as being included.

List available at http://www.kidsfirstcanada.org/List_of_Groups_Invited_for_Consultation.pdf

- ❖ We suggest a “citizens’ assembly” and referendum as a more appropriate method of creating early childhood/family policy. Our organization, Kids First Parent Association of Canada, asked by email in February to be involved in the process and that parents be involved in proportional numbers. However, in the email reply these requests were not responded to, and we were not even included in the groups invited. “Stakeholders” in child-related policy are:
 - first and foremost parents, and
 - secondly the voting public.
- ❖ The “stakeholders” invited are organizations:
 - These bodies do not vote.

- They cannot be held accountable for the effects of child/family policy they promote.
 - Parents are the *only* people held personally legally, financially, and morally responsible for their children. As such we are uniquely accountable/liable for the child/family policies we seek. We are the ones (after the children themselves) most affected by such policy.
- ❖ The list of groups invited to participate does not proportionally reflect the diversity of views and expertise in this area.

Conflict of Interest

The groups invited to participate are in possible conflict of interest or appearance of such as their groups, leaders/representatives and/or members would materially benefit from all-day Kindergarten through jobs, research contracts/grants, finances, union members fees, an artificially increased labour pool, the low-wage subsidy effect of subsidized early schooling/daycare, etc.

Costs/Feasibility

We are concerned that this consultation is about “costs” and “feasibility” but there is no information about dollar costs in the consultation paper. Refusing to disclose this necessary information is misleading. These costs are very significant, and there are examples available. Here are two examples of what such programs cost:

1. **\$11,500 CDN – per year/child** age 2-5: **Quebec** spending on daycare operation costs only – capital, training, bureaucracy, pension funds are not included.

[Low Fee Regulated Childcare Policy](http://132.203.59.36/CIRPEE/cahierscirpee/2005/files/CIRPEE05-08.pdf), CIRPEE, p. 22 footnote
<http://132.203.59.36/CIRPEE/cahierscirpee/2005/files/CIRPEE05-08.pdf>

2. **\$26,972CDN – per year/child** age 1-5: **Sweden’s** spending on daycare/preschool.

Association of Swedish Regional and Municipal Governments’ publication
 ”Vad kostar verksamheten i din kommun? Bokslut 2007” (in Eng. approx:
 ”What are the costs of services in you municipality? Annual Report 2007”),
http://brs.skl.se/brsbibl/kata_documents/doc39261_1.pdf, p 150

The consultation paper mentions “no cost to families” and “free” programs. This is erroneous and misleading. We all pay for these programs through various kinds of taxes, and they are not free.

High Costs and Low Quality

Despite these high costs (see above), the quality in both the Quebec and Swedish systems has been reported to be inadequate in the majority of facilities in studies by these governments. Even the OECD notes a “problem of quality” and “deteriorating quality” for Sweden while holding Sweden as the “model” for the rest of the OECD states.

-- *Pre-School in Transition: A national evaluation of the Swedish pre-school, 2004* see link at <http://www.kidsfirstcanada.org/blog-vol1.htm>
-- *Quality Counts IRPP Vol 11 #5 Dec 2005*
<http://www.irpp.org/choices/archive/vol11no5.pdf>
-- OECD Country Note Early Childhood Education and Care Policy in Sweden
<http://www.oecd.org/dataoecd/52/31/2534972.pdf> p 30

Research

- ❖ We note with concern that the paper refers to “research” but does not mention any specific papers, authors or findings. This creates a serious lack of transparency in the process.
- ❖ The list of research used (provided to us on request) is weighted heavily to papers that have *not* been published in peer-reviewed journals. The inclusion of the publications of the daycare lobbying groups and individuals such as the Childcare Resource and Research Unit, the OECD Babies and Bosses series, Drs. Cleveland and Krashinsky, Lynelle Anderson, etc, and the absence of many significant papers published in peer-reviewed journals further confirms the extreme bias of this consultation.
- ❖ The consultation paper does not mention that parents and the “home environment” have been consistently found to be the most influential factors in children’s lives. Even a relevant Statistics Canada paper finding benefits of some home environment traits and early learning experiences is absent. See

“Readiness to Learn at School Among Five-year-old Children in Canada”
<http://www.statcan.ca/english/research/89-599-MIE/89-599MIE2006004.pdf>

- ❖ Also excluded is a relevant HELP paper, which finds that **“participating in early childhood care and education programs and services at the age of 2 and 3 had little direct association with children's home and school outcomes in Kindergarten.”**

“The association of early childhood care and education to children's experiences in Kindergarten”

http://www.earlylearning.ubc.ca/documents/ECCE_Kohen_Lipps_Hertzman_Article_March_2006.pdf

Definitions Not Provided

The consultation paper states that: *“Most children’s early learning takes place through relationships and play and, while these can be informal, there is also strong evidence that quality early childhood programs have positive impacts on children’s future success in the school system.”*

This and other statements are meaningless due to the lack of definitions of key terms:

- “informal”
- “early childhood programs”
- “quality”
- “future success in the school system”

Statements of this nature that are couched in caveats while vaguely promising undefined benefits from undefined programs abound in the literature promoting early schooling/daycare. Since the authors of such empty statements have essentially said nothing, they avoid all accountability for negative outcomes resulting from policy being put in place based on their statements.

“Early childhood programs”: this can include prenatal classes, going to the library with our child, Sunday school (included in the EDI questionnaire), financial assistance to parents, swimming classes, music lessons, etc.

“Future success in the school system”: does that mean slightly higher scores on some academic tests in kindergarten/primary school? – if so, these have not been shown to last long. What does it mean?

“Formal”: can mean anything that is organized by an organization rather than by parents, extended family, and friends. Thus “parks and rec” programs, parent-child drop-ins, La Leche League, religious and ethnic and cultural organizations, home-learners groups, private music teachers, soccer clubs, tutors, nature lovers, language classes, daycares, babysitters, etc. all provide “formal” programs.

“Enrollment” in preschool/kindergarten/daycare in various OECD and other regions should be clearly distinguished from “full time equivalent attendance.” For example, the high level of enrollment in French preschool is often mentioned with no information about how many hours per day/week/year children actually are in the preschool.

A Solution in Search of a Problem

“Play-based” programs are stressed, but it is not clear in the consultation paper why play ought to take place in a “formal” kindergarten setting as opposed to any other. The concepts of “play” and “formal program” may be mutually exclusive. Schools run the risk of undermining their own *raison d’être* if they are perceived as being about “babysitting” rather than education.

Play in the “formal program” is likely to be compromised by the physical limits and limits due to group size and health concerns (bacteria, allergies). For institutions – but not for families – free play in natural settings is very difficult to supervise; the outdoor spaces are inevitably small and highly structured. Liability concerns trump free play and exploration.

- Observing and attaching to adults is perhaps as important as free play in children’s development. However the paper makes no mention of this. The proposed child-centred setting almost eliminates opportunities for these developmental tasks which abound in parental care/learning.
- Children at ages 3-5 are able to benefit from some “direct instruction” in, for example, dance, music, cooking, stories, and art. If there is no direct instruction and only play, the system may avoid any possibility of evaluation. Thus “curriculum” inevitably becomes necessary and then tends to become inappropriately academically oriented as feasible evaluations focus on that type of skill.

- Since “informal” programs have been shown to be beneficial according to the paper, and since “formal” programs abound without all-day kindergarten for ages 3-5, it is clear that there is no problem that needs to be addressed by this proposal.
- All-day kindergarten for 3-5 year olds would disastrously undermine the existing multitude of “formal” and “informal” options by bleeding the resources of dollars and publicity to that from everything else.

The statement, “*our children should have access to early learning programs,*” implies that children do not have access to these. The consultation paper then goes on to falsely conclude that children therefore “need” government-run, early, all-day classroom experience.

Accountability

- ❖ The paper refers to OECD, other Canadian provinces, and European examples of early schooling. However, we do not live in these places, having chosen to come to or remain here in BC. The policy makers in these regions have no accountability to the BC electorate.

The OECD is not even an elected body.

- ❖ The cultural/social/educational/linguistic/historical context is very different in these different places; policy cannot simply be imported, especially when it is not demonstrated to be producing the promised benefits even in its place of origin.

For example, improved “social cohesion” and “social inclusion” is frequently promised to result from early schooling/daycare policies. However, this has not been shown to happen – if it could be proven – in places with extensive early schooling/daycare. In France, widely cited for its extensive daycare/preschool programming, the reoccurring rioting, race/class upheavals, and the deaths of thousands of seniors alone in apartments in one heat wave would argue against improved social cohesion there.

Transparency

- ❖ The “integration” agenda is apparent throughout the consultation paper but is not clearly referred to or described. This is a radical departure

aimed at greater state intervention in the family against the so-called “ideology of the family” and towards the “professionalization of care.” These goals need to be clearly stated so as to be debated openly.

According to the OECD “integration” is about transition to “*a new order. This includes deep changes in societies in general and in the family's structure in particular...a review of the family-state relationship regarding the responsibility for the care and education of children.*”

See

["An Integrated Approach to Early Childhood Education and Care: A Preliminary Study"](http://www.childcarecanada.org/pubs/op16/op16.pdf)

<http://www.childcarecanada.org/pubs/op16/op16.pdf> p.3

We reject this agenda and believe that most parents and the public of BC will also reject it when they are informed of it.

- ❖ Though the OECD is referred to as if it were a policy-neutral statistical body, it in fact has definite policy objectives for child/family policy: institutional group care, globalization, a large “flexible” work force. It endeavours to have its policies taken up in member states through “name and shame” tactics of “peer pressure and peer review” according to its own and other writers. See

-- "[PEER REVIEW: A TOOL FOR CO-OPERATION AND CHANGE An Analysis of an OECD Working Method](http://www.oecd.org/dataoecd/33/16/1955285.pdf)" by Fabrizio Pagani. OECD General Secretariat for Legal Affairs.

<http://www.oecd.org/dataoecd/33/16/1955285.pdf>

- "[The OECD and the reconciliation agenda: Competing blueprints](#)" by Rianne Mahon, published by the Childcare Resource & Research Unit University of Toronto, Occasional Paper # 20 p 13

- ❖ Uniformity of educational/child/family policy for OECD members is apparently an underlying goal of so-called “peer review and peer pressure.” Peer pressure is considered by some to be a form of “bullying.” Such a value must be stated openly and debated openly. It is unlikely that it is shared by many in BC.

This goal undermines democracy in BC as our citizens are not voting/participating “citizens” of the OECD. Here we have very high levels of diversity in family/learning/culture. Additionally, there we have a high level of tolerance and appreciation for this diversity.

- ❖ There are many other examples of other approaches in the regions discussed, yet these go unmentioned. Even regions which have early schooling often have other policies that are not mentioned – for example, the “family taxation” policy of France; the income redistribution/welfare policies in Sweden; and significant family allowances in France, Finland, Germany, etc. Sweden’s move to funding families who provide their own child care is not mentioned.

The paper states:

“A recent review of early learning in 20 countries worldwide, conducted by the Organization for Economic Co-operation and Development (OECD), found growing levels of interest in increasing universal access to quality early learning for children aged three to six and the importance of qualifications in the staff providing the service.

Other significant developments include:

- *a trend towards combining early childhood programs with programs for primary school age children;*
- *a growing belief that care and education are not separate concepts, and that quality programs for young children provide both;*
- *an emerging consensus that early learning programs should be led by educators with appropriate post-secondary training; and*
- *a trend towards full coverage by the education system for children aged three to six. Many countries are working towards offering two years of free (publicly funded) early learning before Grade 1.”*

However all these trends are OECD policy initiatives. To report them as if they were not OECD policy but somehow democratic and independent is misleading. The OECD is clear that it seeks to push early schooling/daycare through “name and shame” tactics of “peer review and pressure” by selectively publicizing such “trends.”

The OECD review of Canada was utterly lacking in objectivity as it relied excessively on the work of leading daycare lobbyists here (Martha Friendly, etc.) – a fact which both parties attempted to cover up. See

“The OECD and Canada's Daycare Lobby: Ties Denied”
<http://www.kidsfirstcanada.org/martha-denies.htm>

John Bennett who conducted the non-objective “review” promotes the “integration” agenda. See

“Toward a new pedagogical meeting place? Bringing early childhood into the education system” -- Briefing paper for a Nuffield Educational Seminar; Peter Moss & John Bennett, Nuffield Foundation, 26 Sep 06
www.nuffieldfoundation.org/fileLibrary/doc/briefingpaper.draft3.august17.doc

Even though Bennett is a leading promoter internationally of this agenda, he admits there is not evidence to support it and cites problems with Sweden: **“Despite the potential significance of bringing ECEC into the education system, there is little up-to-date research evidence about the process or the consequences.”**

In short the “integration” agenda amounts to a massive social experiment using our young children and parents as lab rats.

Furthermore, the OECD’s evaluation on this issue in Canada was shown to be false by its very-often cited but grossly-underestimated evaluation of our expenditure on ECEC. The OECD counted only kindergarten expenditures and nothing else, according to HRSDC official, Shawn Tupper, in his report to the Senate on the issue. This false finding continues to be reported by others. For example, the organization, First Call, quoted it in their submission to this consultation. See transcript:

http://www.parl.gc.ca/39/1/parlbus/commbus/senate/Com-e/soci-e/24evb-e.htm?Language=E&Parl=39&Ses=1&comm_id=47

Quality

We know that high quality is rare, even in Sweden.

The RAND Corporation (which pushes early schooling/preschool) reports that inadequate quality is pervasive in California. It reports allowable

maximum ratios of 1 staff for 10 children – acceptable to RAND – which are grossly inadequate to create high quality. See

“Room for Improvement in the Use of High-Quality Preschool Programs for California's Children”

http://www.rand.org/pubs/research_briefs/RB9358/index1.html

Ratios of 1:8 and 1:9 for this age group resulted in half the children “**not receiving developmentally appropriate activities**” and “**not receiving adequate caregiving**” in peer-reviewed research cited by Gillian Doherty.

--Howes, C , Phillips, D.A., & Whitebook, M. (1992). “Thresholds of quality: Implications for the social development of children in center-based care”. *ChildDevelopment*, 63, 449-460 (page 455).

-- “The Great Child Care Debate:The Long-Term Effects of Non-Parental Child Care” P 47 <http://www.childcarecanada.org/pubs/op7/op7.pdf>

The paper mentions the importance of “high quality” but does not define this. Currently, many daycare/early schooling lobbyists/advocates advance definitions of quality that reject attachment theory and “empirical evidence” from developmental science. For example Helen Penn’s work, which is cited in the Quality by Design /CRRU website. These new definitions lack validation and rigour and contradict extensive research findings: they should not be applied. Ratios and group size are key items.

- ❖ We note with concern the inclusion of papers/material from those who:
 - Reject “empirical evidence” from developmental science;
 - Reject Attachment Theory;
 - Reject or downplay the importance of child-to-staff ratios and group size and adult-child relationships in defining “quality;”
 - Do not specify what “appropriate” ratios/group sizes are in their view.

- ❖ Likewise we note the absence of material from those who accept the validity of empirical evidence from developmental science and attachment theory.

The HELP Organization

- ❖ We note with concern that all the “experts” in child development listed in the invitation list are from the Human Early Learning Partnership (HELP) and that this fact is not stated.
- ❖ We note with concern that HELP staff (with a very few like-minded associates) are the only academics doing the visioning, advising, evaluating, and data collecting on young children in the Provincial Child Care Council, “Strong Start”, ECLA, “Bold Vision”, etc. This one-sidedness makes for harmful, undemocratic, biased policy.
- ❖ We note with concern that HELP has stated very clearly what policy it seeks to implement: all-day schooling and wrap-around daycare. See

Hillel Goelman Vancouver Sun Sept 2007

<http://www.earlylearning.ubc.ca/documents/2007/HG%20Van%20Sun%20PreK%20Proposal%20Sep%202007%20final.pdf>.

- ❖ Clyde Hertzman, HELP Director, has stated (CBC *Ideas*, July 2008) that lower school enrolment should not result in lower budgets: budgets should be maintained and space filled with younger children.
- ❖ We note that HELP’s own unpublicized research demonstrates that the policy they seek to impose has, at best, no benefits and also produces harmful behavioural effects and low quality. See

“HELP Findings that Contradict HELP’s Promotion of Early Schooling/Daycare”

<http://www.kidsfirstcanada.org/help-contradictions.htm>

- ❖ We note with concern that HELP already announced “Universal child care coming” in announcing this throne speech item, clearly prejudicing the consultation.
- ❖ We note with grave concern that HELP’s leadership has attempted to discredit academics who challenge their policy objectives. Specifically, Clyde Hertzman and Hillel Goelman have publicly attacked the work of Drs. Milligan, Baker and Gruber for their peer-reviewed findings of negative outcomes for Quebec since \$5/day daycare. Dr. Hertzman publicly called these academics “zombies” conducting “statistical malpractice.” Such shockingly unprofessional, slanderous, and

“bullying” conduct should result in disciplinary action, not more government contracts.

Similarly, Drs. Hillel Goelman and Paul Kershaw have attempted to discredit the internationally renowned expert in this area and consultant to the PM of Britain, Dr. Jay Belsky, and have misrepresented the NICHD findings to the Minister in emails, which we have obtained. Specifically they claim that negative behaviour outcomes for children in group care were lessened with high quality. But the NICHD study found that high quality did not make a difference to negative behavioural outcomes. Goelman falsely portrayed Belsky as a lone researcher.

The Rhetoric of “Choice”

It is difficult to understand how parents will have more “choice” if this policy were implemented. Could parents choose to receive a sum equivalent to our child kindergarten allotment with which to pay for care/learning goods and services of our choosing for our children? That may allow for greater choice.

Building a monolithic “system” of the sort proposed inevitably drains resources from the existing highly complex and diverse system. In fact the consultation paper provides no recognition of this existing system at all.

The model of very-limited choice offered is sometimes called “structured choice” and is used in working with toddlers and mentally challenged individuals: it is insulting and unnecessary to apply such tactics to parents and the public at large.

The rhetoric of choice distracts from the issue of *equality* for the choices we actually prefer to make.

In BC we are told kindergarten is not “compulsory” – i.e. it is already a choice, though not many are aware of this fact. But with the legalization of home-learning ALL schooling from kindergarten to grade 12 is not “compulsory” beyond registration of the child. However, parents who do not use all-day schooling for their 3 to 5 year olds –for whatever reason – would still be forced to pay for it though taxes in addition to their own care/learning costs.

Many parents would not use the proposed program for many reasons: their religious and consciously held beliefs about children's care/learning, their child's physical or emotional health, language and cultural concerns, schedule concerns, etc.

This is discriminatory against all these parents and children **in violation of our Constitutionally-guaranteed rights and freedoms.**

The government should avoid enacting even more discriminatory policy that will lead to lawsuits due to the unjustifiable discrimination and the harms caused.

1. What are your thoughts on full school day kindergarten for 5-year-olds?

Fund all parents so those parents who wish to choose this service can afford to pay for it. This service could cost well over \$10,000/child. Parents and/or organizations and/or entrepreneurs could set up these programs if they want them enough; they already have (e.g. Montessori full-day programs).

However, parents and the public have the right to "informed choice" in these issues. Implying to parents that all day kindergarten will benefit their children, when this is quite unlikely for most, violates this right.

Leading developmental psychologist, Dr. Gordon Neufeld, opposes full-day kindergarten, especially for children with challenges, because it strengthens peer-attachment. Peer attachment handicaps children's development and learning when it is dominant over adult/parent attachment. Children are "stuck" in pleasing peers who are not able to help them "grow up."

RAND Corporation research finds that children do better on academic tests when they start kindergarten later than age 5 years or 60 months. Finnish formal schooling begins at age 7, and Finland has the highest literacy rankings. See

Charts pp110-112

http://www.rand.org/pubs/rgs_dissertations/2005/RGSD177.pdf

2. What about parent choice for full-school-day pre-kindergarten programs for 4-year olds?

As above, fund all parents equitably so they can create/pay for this or something else if they make an informed choice to do so.

Inform parents that research demonstrates that the quality is likely to be low and that their children are unlikely to benefit and very likely to suffer negative physical health, stress, and behavioural effects.

3. What about parent choice for full-school-day pre-kindergarten programs for 3-year olds?

As above, fund all parents equitably so they can create/pay for this or something else if they make an informed choice to do so. Inform parents that research demonstrates that the quality is likely to be low and that their children are unlikely to benefit and very likely to suffer negative physical health, , and behaviour effects.

4. What do you think are the most important factors to consider in expanding early learning programs in British Columbia?

- ❖ **First do no harm:** Avoid policy-based discrimination in any form against parents and children who prefer other forms of care/learning.
- ❖ The best interests of children – as defined by their parents. The “labour force” expansion goals of the OECD, HELP, RAND, and the World Bank have no place in this area.
- ❖ Clearly reject child/family/education policy from the OECD, RAND and the World Bank and the related “shared responsibility” and “integration” agendas as discussed in the OECD's 2001 paper entitled “[An Integrated Approach to Early Childhood Education and Care: A Preliminary Study](#)”

<http://www.childcarecanada.org/pubs/op16/op16.pdf>
and in the RBC's VP Charles Coffey's 2005 World Bank speech
<http://www.rbc.com/newsroom/20050928coffey.html>

Invitation to Respond – Part Two

Please provide the following information about yourself and/or your organization. This will help ensure that the government hears from a wide range of individuals and groups.

To help us understand your perspective on the issues, please check the box or boxes that best describe you.

- I am a parent with a child under five
- I am a parent with children over five
- I provide child care services
- I am an early childhood educator
- I am a kindergarten teacher
- I am a teacher in Grades 1 to 12
- I teach in a post secondary institution
- I am a researcher
- I am a member of the business community
- I provide health or social services
- I am an interested member of the public
- ✓ **I am responding on behalf of an organization**

If you checked the last box, please provide the name of your organization:
_____ **Kids First Parent Association of Canada** _____

You do not have to provide your name, but you may do so if you wish:

Please submit your comments by August 15, 2008.

- By mail: Early Childhood Learning Agency, Ministry of Education
Box 9158 Stn Prov Govt, Victoria BC V8W 9H3
- Online: www.bced.gov.bc.ca/ecla/
- By e-mail: EDUC.earlylearning@gov.bc.ca

Note: The information gathered in response to this paper will inform recommendations to the government. This is only one of the sources of information that will be considered.