

**SUBMISSION TO SENATE COMMITTEE ON SOCIAL AFFAIRS, SCIENCE AND
TECHNOLOGY**

RE: THE OECD'S REVIEW OF CHILD CARE AND EARLY LEARNING IN CANADA

**FROM:
KIDS FIRST PARENT ASSOCIATION OF CANADA
www.kidsfirstcanada.org
info@kidsfirstcanada.org
604-291-0088**

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WHO WE ARE

Kids First Parent Association of Canada was established in 1987 with 2 objectives:

1-support for the optimal care of children

2-support and recognition for parental child care.

We are 100% volunteer run, and receive no government, corporate or union funding. We endeavour to be a voice for the 90% of parents who say they prefer parental child care (Vanier Inst 2004).

As our objectives indicate, we are committed to high quality child care and early learning. All children need child care and learning: children suffer and die without these. But at issue is: what do these terms mean? We define these terms inclusively: child care means any care of a child including parental care. Early learning is the learning a young child does, and begins naturally before birth as the unborn practice suckling and learn the sound of their mother's voice, without state involvement. But, exclusive discriminatory definitions are used in much 'research', policy and legislation; this must be changed.

RECOMMENDATIONS

1- ELCC funding must go directly and equitably to families. End discriminatory preferential treatment of non-parental care. This is the only way:

- to avoid litigation against the government for negative effects when the promised 'benefits' and savings do not appear.

– to avoid massive increased costs to government for increased costs of illness and social dysfunction resulting from a government-sponsored program that intentionally reduces the time parents spend with their babies and children.

- to assure Constitutional compliance, optimal child well-being, and respect for diversity and democracy.

2- Show real CARE FOR CHILDREN by spending money on dramatically improving SAFETY of products intended for children: ban imports of toxic items, ban items known to cause health problems without any benefit (eg baby powder, baby wipes with alcohol in them). OR combine this with PUBLIC INFORMATION CAMPAIGN – ads, posters, product labeling – for children's products (as is done with tobacco products).

A CAMPAIGN PROMOTING PARENT-CHILD ATTACHMENT and BREASTFEEDING - billboards, posters, ads on transit– not just targeting mothers – would be welcome.

CORRECTIONS TO SOME INFORMATION FROM WITNESSES TO THIS COMMITTEE

1- Misleading data presented regarding ‘working mothers’ :Labour Force Participation (LFP) rates

Margaret McCain and others cite the percentage of mothers ‘working’ - usually they say 70% - as evidence of the demand and need for daycare. Firstly, we would hope that the Senate rejects as dangerous misogyny any use of the word “work” that implies that those who are doing un-waged care work are not working: we trust you agree that “every mother is a working mother.”

Mother's Labour Force Participation Breakdown 2001 - Canada

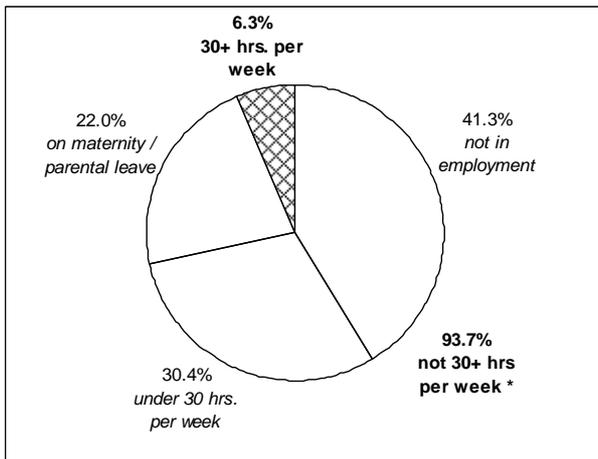
* *Note: '30+ hours per week' includes unpaid work for family farm or business, paid work at home, and unpaid time at paid job.*

Calculated from OECD "Babies and Bosses" Volume 4, table 3.5 assuming that percentages given are of ALL mothers not just those 'in employment'

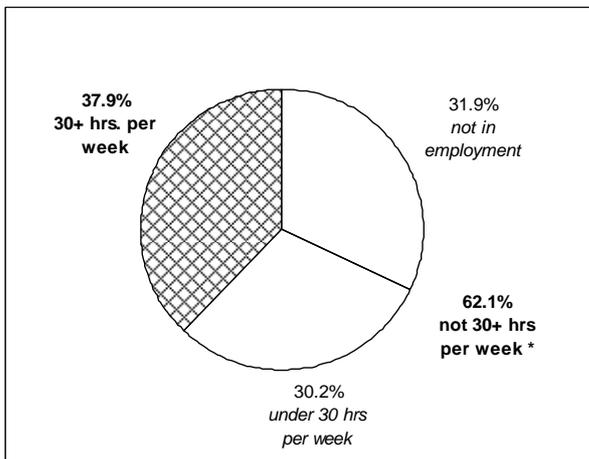
(<http://www.oecd.org/dataoecd/57/40/34906050.xls>)

Mothers with youngest child...

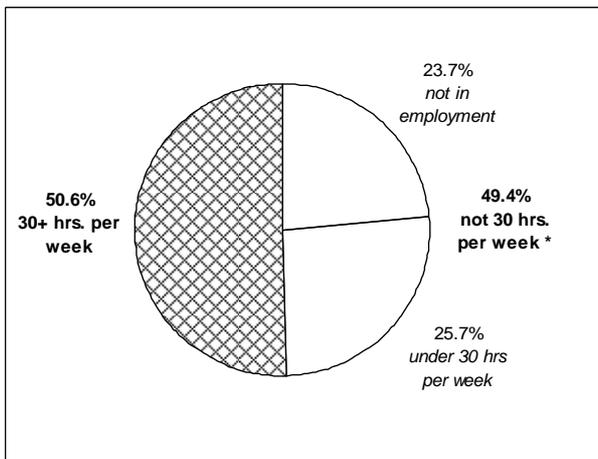
UNDER 3 YEARS



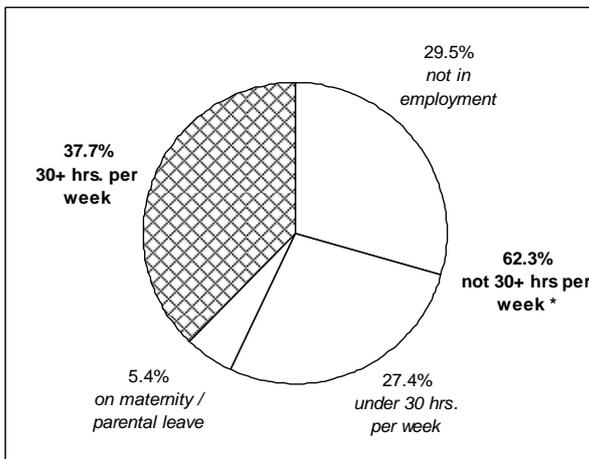
3 – 5 YEARS



6 – 16 YEARS



0 – 16 YEARS



Secondly, according to Statistics Canada's glossary of terms (<http://www.statcan.ca/english/freepub/71-222-XIE/2004000/glossary.htm>), LFP does NOT mean 'working' or even 'at a full time paid job outside the home.'

LFP includes those 'employed' and 'unemployed' which include:

- being on maternity/parental or other leave
- any amount of part time paid work – no minimum
- unpaid work for a family business or farm
- looking for a job
- paid work done with children present at home or elsewhere

Furthermore, it is insulting to simply assume without asking that mothers with jobs want daycare centres. Asking parents about their preferences is the only democratic way to know what their preferences are. It is sad that women got the vote decades ago but are still politically marginalized by those who believe they 'know what's best' for us.

The best data we have on demand for daycare comes from the Vanier Institute 2004 survey in which 9 of 10 parents stated they preferred parental child care; daycare centre care was ranked #5 while parental care was ranked #1 (http://www.vifamily.ca/library/future/future_toc.html section 5 and section 8 - #5).

Statistics Canada does not provide a breakdown of mothers' LFP. The only partial breakdown we have located is in a related OECD report. Below is a breakdown based on that information. **Clearly, the vast majority of mothers are not in full time paid jobs away from their children.**

2- grossly exaggerated membership of Child Care Advocacy Association of Canada

Jody Dallaire, President, Child Care Advocacy Association of Canada claimed that that organization's vision, "*is supported by our membership that reaches more than four million Canadians across Canada*". She implies a membership of over 4 million, which is misleading. Their 2004/05 Annual Report says they have:

"915 active individual and organizational members, an increase of 27% over last year"

http://www.ccaac.ca/pdf/resources/annualReports/ccaac_annualreport05.pdf p7

3-mistaken academic credentials of Martha Friendly

Martha Friendly is addressed several times during her presentation as 'Dr' and 'professor'. However, she is neither. She did not correct this error, allowing a false impression of her academic and professional status. This information was first brought to our attention by Dr Paul Kershaw of UBC.

Bio of Ms Friendly <http://www.childcarecanada.org/about/whoMF.html>

4-Mistaken credentials for Dr Mustard

Dr Mustard's professional and academic experience and training are not in child development or neuroscience, but in blood related research. His interest in child development is recent. There are other Canadians who do have this professional/academic expertise and it would be advisable to invite them to present: eg Dr Gordon Neufeld, Dr Elliot Barker, Dr Gabor Mate.

5- lack of peer reviewed research:

The lack respect for standard scholarly process is apparent. The OECD's reports and reviews are not peer-reviewed in the standard academic fashion, nor is Dr Fraser Mustard and Margaret McCain's Early Years Study I and II, nor are any of Martha Friendly's Childcare Resource and Research Unit publications such as those by Drs Cleveland and Krashinsky, nor is Dr James Heckman's paper claiming amazing returns for 'early intervention'.

A great deal of peer reviewed literature exists in scholarly journals but is not presented (we present some here). Promoting a massive social program based on blatantly biased research of dubious scholarship would be negligent in the extreme.

CONCERNS ABOUT MUSTARD/McCAIN TESTIMONY

We are concerned that there has been no group representing parental child care presenting to this Committee. Mustard/McCain mentioned parents and mothers often but these words were essentially ‘lip service’. We are concerned about the discriminatory undemocratic remarks they made during their testimony and elsewhere:

1 - Dr Mustard has publicly declared that “**17% of parents are godawful**” and only one third of us are “*competent*”. (see Toronto Star article mar 26/07 at <http://www.kidsfirstcanada.org/torstar-mustard.pdf>) . Parents do not have an anti-defamation league to defend us. Dr Mustard’s contempt for Canadian parents and citizens underlies his promotion of non-parental care. His apparent trust in training, high wages, and experts at massively improving children’s long term outcomes and ‘human capital’ is not supported by any peer reviewed evidence.

2-In her testimony, Ms McCain made the following insulting unsupported comments about nannies (paid "in-house caregivers"):

"Many families are paying \$300 or \$350 a week for in-house caregivers who are not doing the job well, with caregivers who are not well-trained, do not speak the language well and are not stimulating the children. These children would be far better off in high quality early child development centres."

Many of these are immigrant women from racial minorities. Hence, her comments could be interpreted as elitist, sexist and possibly racist. No Senator is recorded as questioning her on this. It is at least ironic that Ms McCain, whose family wealth has been largely created by parents’ exercising their ‘free market’ choice to buy frozen food products, has so little regard for the choice of parents who choose to purchase a nanny’s services.

3 – They frequently mention **low literacy levels** in Canada compared to Cuba, Finland, Sweden. Canada has a multi-cultural extremely heterogeneous population which render such comparisons meaningless. Many Canadians are quite literate but not in English or French.

4- They estimate the program they propose would cost **\$18.5 billion**. Last year in their Early Learning II report this same estimate was **\$10 billion** (Toronto Star Mar 26, 2007 pg. A.1), a figure frequently mentioned by others in the daycare lobby. What will it be next year? These are both gross underestimates: for the approximately 5 million children 0-5 that’s only **\$2000-3700 each**. Sweden spends over \$20,000/child/year for full time care, and still has serious quality problems (see ‘quality’ box below).

5- Dr Mustard’s close ties to the **World Bank** are of concern. The World Bank is not recognized as a child/parent-friendly organization. It lobbies for more funding to daycare and promotes daycare as part of the “**business imperative**”. Mustard/McCain’s Early Years Study concludes with quoting the World Bank asking for the “combined support of governments, non-government organizations, **the private sector** and the media” but NOT parents in early child development.

<http://web.worldbank.org/WBSITE/EXTERNAL/TOPICS/EXTEDUCATION/EXTECD/0,,menuPK:344945~pagePK:149018~piPK:149093~theSitePK:344939,00.html>

The Early Years Study Fraser Mustard

[http://wwwFOUNDERS.NET/ey/home.nsf/a811f0e8afbb2a7985256786003a3dd9/1e4ad2a677be034685256a4700737a3b/\\$FILE/early_years_study.pdf_p182](http://wwwFOUNDERS.NET/ey/home.nsf/a811f0e8afbb2a7985256786003a3dd9/1e4ad2a677be034685256a4700737a3b/$FILE/early_years_study.pdf_p182)

6- The recommendations – to fund a massive institution-based care/early learning ‘system’ – does not follow from the scientific information presented. “Stimulation” and responsive ‘high quality’ care in the animal studies mentioned is by birth mothers of their own offspring (occasionally by adoptive mothers). In fact the evidence presented would argue for large incentives for maternal-only care - which we do NOT recommend – rather than stranger/expert care.

7- Regarding the study finding negative outcomes of the daycare policy in Quebec by **Milligan/Baker/Gruber**: the Quebec government found poor quality (see “Low Quality” box below). The staff:child ratios are as bad as they are in Australia: 1:5 for 0-18 months. Dr Mustard’s evaluation of the study was unprofessional. Ms McCain claimed that the authors say there are no benefits to breastfeeding. This is a false accusation: Milligan and Gruber have defended breast-feeding publicly and did a study for Statistics Canada finding increased practice (<http://www.statcan.ca/Daily/English/070619/d070619d.htm>).

DECEPTIVE DEFINITIONS

Research showing that child care, early development and learning are beneficial, and polls showing they are popular, use broad *inclusive* definitions. Definitions include: Sunday School, parental care, prenatal classes, going to the library, preschool, and studies of rat pups licked by their mothers (see Definitions box below). These situations then get lumped with 50 hours/wk of infant daycare to say “child care and early learning” is beneficial. But there is no peer-reviewed study that shows long term benefits of long hours in licensed centre care from birth. Using inclusive definitions when saying there are benefits and public demand, and then using an exclusive definition when it comes to funding, is a deliberately deceptive tactic.

DIFFERENT DEFINITIONS OF CHILD CARE AND EARLY LEARNING

Research showing that child care, early development and learning are beneficial, and polls showing they are popular, use broad inclusive definitions.

“CHILD CARE” is defined as...

* US National Institute for Child Health and Human Development Child Care study: non-maternal care over 10 hours per week

*Polls: *“When the question is whether a child-care system of some sort [their emphasis] should be available for all families, a consensus emerges.”* This included: *“government should pay parents to stay at home with young children”*

Canadian Policy Research Network “Press Release: Values and Preferences for the ‘Best Policy Mix’ for Canadian Children” <http://www.cprn.org/en/doc.cfm?doc=794> RN

* Statistics Canada 1988 “National Child Care Study”: all forms of care including all forms of parental child care

*Statistics Canada 2006 “Child Care in Canada”: parental child care and different types of non-parental child care counted

“EARLY LEARNING” is defined as..

-1962 Perry High/Scope Preschool Project that found \$7-\$17 saved for \$1 spent for very under-privileged children of home-based welfare mothers. The program consisted of regular parent meetings + weekly 1.5 hr home visits by teacher + 2.5 hr day classroom time for 3-4 yr olds with 5-6 children per teacher (BC preschool staff:child ratio is 1:15).

* Human Early Learning Partnership (HELP) April 2006 Van Sun *“includes programs and information on child health and nutrition; screening for developmental delays, and interventions for children with special needs.”*

* Early Development Instrument Offord Centre for Child Studies - questionnaire recommended by F Mustard & HELP : speech therapy, parenting program , language classes, preschool, Sunday school, Hebrew School, playgroup, music /art classes

http://www.offordcentre.com/readiness/files/EDI_2008_General.PDF p 8

<http://www.offordcentre.com/readiness/files/2005.EDI.ENG.Guide.pdf> p15

Statistics Canada Nov 2006 “Readiness to Learn at School Among Five-year-old Children in Canada” by Eleanor M. Thomas: play group, drop-in centre, nursery school or preschool, parent and child lessons or program, library storytime or other reading program or book club. Parents attend most of these situations with their children.

<http://www.statcan.ca/english/research/89-599-MIE/89-599-MIE2006004.pdf> p63

HIJACKING DEFINITIONS TO DE-FUND FAMILIES

The OECD is supportive of efforts to hijack all funding for child care and early learning by hijacking the very terms “high quality”, “child care”, “early learning”. The daycare lobby seeks a monopoly on these terms for their own financial/political gain at the expense of paid and unpaid providers of other care and learning services, children, and parents - especially low income single mothers and our children. The

intent is to preferentially award funding and power to licensed centres and a massively expanded bureaucratic and ‘advisory’ infrastructure.

This discrimination and the harm it causes is the core of the issue. That is why we oppose the OECD’s recommendations.

SERVING ELITE INTERESTS

The push for institutional care/learning is manufactured by the elite interests that make up the daycare lobby. Who are these elites? Knowing this tells us whose interests are served:

1 - The corporate right represented by such as the OECD, the RAND Corporation, the *Economist* magazine, and Dr Fraser Mustard’s promoters: the World Bank, the Royal Bank of Canada, the Van. Board of Trade.

2- the leadership of unionized labour in the public and private sectors: eg CUPE, CAW.

3- a particular breed of academics and their allies that promote sexist punitive measures against women who choose to prioritize doing family care work: the Childcare Resource and Research Unit, the Child Care Advocacy Association of Canada, the Human Early Learning Partnership at UBC, U of T daycare economists Cleveland & Krashinsky, and many others.

DISCRIMINATION

Excluding parental child care from definitions of child care is obviously extremely offensive to voters, right up there with ‘beer-and-popcorn’ attacks. What Party wants to remind voters they think parents don’t even provide care for our children, let alone ‘high quality’ care? Additionally, it is highly offensive to claim or imply that parents are unable to choose appropriate non-parental care and learning. We – especially mothers - forego billions in opportunity costs as well as pay billions for many forms of care and learning that are not covered by the OECD.

CONSTITUTIONAL PROTECTIONS

In addition to being offensive such discrimination violates many constitutional protections:

- equality before the law for the children and parents – especially women – who will not use funded services for whatever reason, including logistical and health reasons
- protection of conscience, religion, language, sexual orientation for those who do not use the funded service for these reasons and are therefore excluded.

In a related case involving a father caring for his severely handicapped adult daughter, the BC Human Rights Tribunal ruled that the government could not refuse to fund a care-provider simply because he was a family member. They were awarded \$300,000 and future yearly funding. This ruling was upheld on appeal. The preferential funding of institutional care/learning will be contested in lawsuits that could cost billions. The lesson of the residential schools should be heeded. (Hutchinson vs Min Health

[http://www.bchrt.bc.ca/decisions/2004/pdf/Hutchinson_v_BC_\(Ministry_of_Health\)_\(No_2\)_2004_BCHRT_122.pdf](http://www.bchrt.bc.ca/decisions/2004/pdf/Hutchinson_v_BC_(Ministry_of_Health)_(No_2)_2004_BCHRT_122.pdf))

FALSE ASSURANCE: “HIGH QUALITY”

LOW QUALITY IN MOST LICENSED DAYCARE

CANADA

*most licensed daycare in Canada “*is of minimal to mediocre quality*”

“You Bet I Care! 2” http://action.web.ca/home/cfwwb/attach/ybic_report_2.pdf p. ix-x

*“*The majority of children age 0-12 in centres do not receive adequate amounts or types of experiences to promote language and cognitive development*”

-Gillian Doherty “Quality & Predictors of Quality in Canadian Child Care” Centre for Excellence for Early Childhood Development, Regina June 2005 http://www.excellence-earlychildhood.ca/documents/Gillian_Doherty_ANG.pdf p.4

* Of the 234 licensed daycares that volunteered for the study, only 44.3% of preschool-age centres and 28.7% of infant/toddler centres and 36.8% of family daycares are “providing activities and materials that support and encourage children's development.” That was with staff:child ratios of 1:2.6 to 1:4.8, far better than regulation standards.

“You Bet I Care! 2”, p 34,73, ix http://action.web.ca/home/cfwwb/attach/ybic_report_2.pdf, Report 3 Executive Summary

*“*The highest level of positive caregiving was provided by in home caregivers, including fathers and grandparents, caring for only 1 child, closely followed by home based arrangements with relatively few children per adult. The **least positive caregiving was found in center based care with higher ratios of children to adults.***”

-“Characteristics and quality of child care for toddlers and preschoolers” Applied Developmental Science, 4. <http://secc.rti.org/abstracts.cfm?abstract=17>

QUEBEC

*minimal quality - 61%, worse than minimal - 12%. Low income children were much more likely to be in low quality care.

Quality Counts IRPP Vol 11 #5 Dec 2005 <http://www.irpp.org/choices/archive/vol11no5.pdf>

*“*We uncover striking evidence that children are worse off in a variety of behavioral and health dimensions, ranging from aggression to motor-social skills to illness. Our analysis also suggests that the new childcare program led to more hostile, less consistent parenting, worse parental health, and lower-quality parental relationships.” “The consistency of the results suggests that more access to childcare is bad for these children.”*

"Universal Childcare, Maternal Labor Supply and Family Well-Being" Baker (U of T), Gruber (MIT) Milligan (UBC) <http://www.chass.utoronto.ca/cepa/childcare.oct2005.final2.pdf> p1,4

SWEDEN

*“*the preconditions for providing good overall **quality have deteriorated**, especially as a result of large groups of children and fewer staff” (p26)*

*“*excessive emphasis placed on formal learning at an early stage can have **negative consequences.***”

*“*sometimes it is apparent that the premises are **not appropriate** to the current group sizes” (p.22)*

Swedish Ministry of Education “Preschool in Transition” 2004 link <http://www.kidsfirstcanada.org/blog-vol1.htm>

*The OECD praises Sweden for high “productivity” in daycare even as it reports “**a decline in quality**” and “**a problem of quality**”.

OECD Country Note Early Childhood Education and Care Policy in Sweden <http://www.oecd.org/dataoecd/52/31/2534972.pdf> p29, 30

The daycare lobby offers false assurances about “high quality”. But “universality” with “high quality” is an impossibility due to insurmountable logistical constraints: staffing (would compete for female staff with nursing where there is a huge shortage already), cost (at least \$50 billion), and child development needs (attachment & attunement). A high quality system does not exist anywhere on this planet, not even in Sweden (see quality box below), even according to the assessments of the leading promoters of institutional care/learning such as Goelman and Doherty..

The quality of daycare has NOT been shown to improve negative behavioural outcomes, contrary to the mantra of the lobby. The US National Institute for Child Health and Human Development exhaustive study of the issue found significant behavioural problems undiminished at grade 6 for children in centre-based child care:

“the effect of center care on externalizing problems remained significant—and did not dissipate in strength—over time means that in the case of non-relative care, it is center care that has unique and enduring impact of a seemingly adverse kind.”

See NICHD ‘Discussion’ paper <http://www.kidsfirstcanada.org/NICH-study.pdf>

Additionally:

“The highest level of positive caregiving was provided by in home caregivers, including fathers and grandparents, caring for only 1 child, closely followed by home based arrangements with relatively few children per adult. The least positive caregiving was found in center based care with higher ratios of children to adults.”

-Characteristics and quality of child care for toddlers and preschoolers. Applied Developmental Science, 4. <http://secc.rti.org/abstracts.cfm?abstract=17>

MEASURING QUALITY

One key to quality is staff-to-child ratios, yet no specifics of what “appropriate” ratios would be are given. This avoidance of ratio specifics is typical. Current allowable ratios in all provinces are such that low quality care is assured. Leading developmental scientists Dr Jay Belsky calls this “a license to neglect”.

EFFECTS OF CHILD:STAFF RATIOS ON QUALITY OF CARE

“THE RELATIONSHIP BETWEEN THE NUMBER OF CHILDREN PER ADULT AND APPROPRIATE CAREGIVING AND DEVELOPMENTALLY APPROPRIATE ACTIVITY”

FROM: “Thresholds of Quality: Implications for the Social Development of Children in Centre-Based Care” Child Development 63 p455, used by Doherty in “The Great Child Care Debate”

<http://www.childcarecanada.org/pubs/op7/op7.pdf> p47

*no child under 14 months was in study

Number of children per adult by age of child	Percentage of children not receiving adequate caregiving	Percentage of children not receiving developmentally appropriate activities
0[14]-24 months - 1:3 or less - 1:3 or 1:4 - more than 1:4	10% 45% 57%	7% 50% 46%
25-36 months -1:4 -1:4 – 1:6 -more than 1:6	4% 26% 39%	2% 41% 42%
37-54 months -1:8 or less -1:8 or 1:9 -more than 1:9	9% 52% 54%	7% 50% 50%

CURRENT ALLOWABLE RATIOS

	Age 1 2001 2004	Age 3 2004	Age 5 2004
BC	1:4 1:4	1:8	1:8
Alb	1:4 1:4	1:8	1:10
Sask	1:3 1:3	1:10	1:10
Man	1:4 1:4	1:10	1:10
Ont	3:10 1:5	1:8	1:12
Que	1:5 1:8	1:8	1:10
NS	1:4 1:6	1:8	1:15
NB	1:3 1:3	1:7	1:12
Nfld/Lab	1:3 1:3	1:8	1:12
PEI	1:3 1:3	1:10	1:12
Yukon	1:4 1:6	1:8	1:8
Nunavut	1:4 1:4	1:8	1:10
NWT	1:4 1:4	1:8	1:10

Childcare Resource and Research Unit -ECEC 2001

http://www.childcarecanada.org/ECEC2001/tables_big/TABLE22.pdf

-ECEC 2004 http://www.childcarecanada.org/ECEC2004/tables_big/TABLE16.pdf

FALSE ASSURANCE: ACCOUNTABILITY

Promoters of institutional care/learning often talk of the need for accountability as a reason for not funding parents – ie we will spend money on ‘beer and popcorn’:

- 1- the state-funded daycare lobby researchers are not held accountable for their dis-information regarding mothers’ work, daycare demand, use & quality (see ‘Disinformation’ below)
- 2-only parents have legal personal accountability for our children.
- 3- when daycare centres violate licensing regulations they are rarely closed or penalized.
- 4- daycare staff, researchers, inspectors, lobbyists, policy makers and bureaucrats are in no way personally accountable for the problems created by preferentially funding daycare, nor for the problems created by daycare itself. They are not accountable for the costs of the following problems:

ILLNESS & HEALTH

- *Elevated stress as shown by raised cortisol levels - this may be source of behaviour problems. Cortisol is key to brain development and affects immunity, impulse control, mood/depression.
- *children in daycare centres get sick more often and more seriously
- *an epidemiologist termed daycare centers *‘the open sewers of the twentieth century’*. (*Day Care Deception*, Brian C. Robertson, p 87)
- *‘Superbugs’ have now been found originating in daycare centres (Globe & Mail 28/06/06)
- * nearly 50% of daycares had high bacteria, worse than public washrooms - NYT Mar6 07

NEGATIVE BEHAVIOUR & SOCIO-EMOTIONAL OUTCOMES

- *“*they’re giving children psychological thalidomide*”- Yale child developmental expert Edward Zigler comment on an “A” rated US daycare (June 20, 1991 NYT)
- *higher levels of aggression, cruelty, non-compliance, etc in children who experienced centre-based care continue to grade 6, longer hours associated with more problems - NICHD ’01,’07
- * “*prosocial behavior scores were lowest for children in licensed day care and highest for children in unregulated home care and relative care.*” This is from Dr Clyde Hertzman of UBC, Chair of Dr Mustards’ Early Development Council, and a leading promoter of licensed daycare. Stats Can 2006 “National Data Sets: Sources of Information for Canadian Child Care Data” p14 <http://www.statcan.ca/english/research/11F0019MIE/11F0019MIE2006284.pdf>

CONCERNS ABOUT THE OECD/WORLD BANK POLICY “POST FAMILIALIST”# POLICY OBJECTIVES

1-Ideology-based Solutions to Low Quality: Redefine “Quality”

The daycare lobby academics are dealing with this pervasive problem of poor quality – by redefining quality. Until very recently quality was judged by how adults interacted with children and physical care issues such as diapering hygiene. The now abandoned buzz-words were “sensitive responsive care”.

Now, the Childcare Resource & Research Unit’s Martha Friendly and the European Commission are promoting the dangerous concept of “system level” quality indicators rather than “program level”. This approach is also promoted by daycare economists Cleveland and Krashinsky writing for the OECD, and in federal government Child Care HR Sector Council publications. “System level” means they promote higher staff wages, training, and unionization as the keys to quality and are abandoning concern for ratios and adult-child interaction.

Worse, quality is deemed to be good “**a relative concept**” based on “values and beliefs” according to Helen Penn, in eof the OECD’s team reviewing Canada. Quality is high if “policy objectives” are met.

What are these objectives? OECD- and World Bank-promoted objectives consist of:

1- corporate welfare through “*redefin[ing] equality*” so as to create more “*flexible labour markets*” and “(directly or indirectly) *subsidizing low wage employment* (‘welfare in work’)”.#

2- increasing the number of mothers in the labour pool*

3- increasing state intervention in the family**#

4- increasing “*professionalization of services*”.**

5- as part of making child development a “*business imperative*”, have parents function more as “*employees and consumers*” rather than as parents.+

**OECD “Putting More Women to Work”

http://www.oecd.org/document/56/0,2340,en_2649_37457_31687864_1_1_1_37457,00.html

**OECD/CRRU paper “An Integrated Approach to Early Childhood Education and Care: A Preliminary Study”<http://www.childcarecanada.org/pubs/op16/op16.pdf>, p. 3,6,9

#“The OECD and the Reconciliation Agenda: Competing Blueprints,” R. Mahon

<http://www.childcarecanada.org/pubs/op20/op20.pdf> p9-11

+Speech at World Bank by RBC Vice President C. Coffey:

<http://www.rbc.com/newsroom/20050928coffey.html>

If these policy objectives are being met, we have ‘high quality’. If children and their parents are suffering and have negative financial, health, cognitive and socio-emotional outcomes, that will not be registered as a quality problem.

2-Ideology-Based Solutions: Rejecting Science and Attachment Theory

Key to this dangerous trend is the daycare lobby’s alarming stated rejection of objectivity, of empirical evidence from developmental science, and of long-established attachment theory. Adopting the daycare lobbyist agenda is akin to allowing those who reject the theory of gravity on ideological grounds to write building codes. One of the leading ideologues promoting this approach is Helen Penn, one of the OECD’s team reviewing Canada, whose work has been disseminated by Martha Friendly at the expense of Canadian tax-payers. According to this thinking:

*“*quality is a relative concept, based on values and beliefs*”

-“Briefing Notes: Quality targets in services for young children” Childcare Resource and Research Unit, U of T www.childcarecanada.org/pubs/pdf/BN_qualityservicetargets.pdf

*“*Definitions of quality cannot be based on empirical research, since they emerge from a consensus about core values and their practical approach*” [emphasis in original].

-“A Framework for Quality: A European Perspective” Helen Penn for The European Commission Network on Childcare and Other Measures to Reconcile Employment with Family Responsibilities <http://www.childcarecanada.org/pubs/fs/fs6.pdf>

*“*Empirical research methodologies in child development may produce impeccable data, but they do not guarantee that the questions being asked in the first place are value free.*”

-“Values and Beliefs in Caring for Babies and Toddlers” CRRU Fact Sheet

<http://www.childcarecanada.org/pubs/fs/fs7.pdf>

*“*The concept ...that a very young child learns best through the close emotional security of a relationship with one adult, is a culturally specific one, and is not generally shared by member states....ratios...should reflect the objectives of the service.*”

-“A Framework for Quality: A European Perspective” Helen Penn for The European Commission

Network on Childcare and Other Measures to Reconcile Employment with Family Responsibilities
<http://www.childcarecanada.org/pubs/fs/fs6.pdf>

****“The old labour-intensive way of caring for children...is no longer viable.”***

-*The Benefits & Costs of Good Child Care* Cleveland & Krashinski
<http://www.childcarecanada.org/pubs/other/benefits/bc.pdf> p67

**[In Europe] *Alternate theories place less emphasis on mothering or substitute mothering and more emphasis on developing relationships between children themselves[New methods'] stress the importance of maintaining children's autonomy by minimizing adult interference , and mediating as little as possible in baby and toddler activities....What role should adults play in very young children's learning...turns on...the extent to which young children are trusted with the freedom to explore out of the range of adult gaze.*

-“Values and Beliefs in Caring for Babies and Toddlers” CRRU Fact Sheet -
<http://www.childcarecanada.org/pubs/fs/fs7.pdf>

3-“Post-Familialism”: Rejecting the “Ideology of the Family” and Inventing the “New Public Child”

The rejection of attachment theory and developmental science is essentially the rejection of babies & children themselves: they do not fit the new “alternate theories”. In this brave new world of OECD-led “post-familialist” policy, babies and toddlers do not need mothers, substitute mothers, or even adults or family:

A top daycare ideologue, Carleton's Rianne Mahon, writing on the OECD's “Reconciliation Agenda” for the CRRU, looks forward to “glimmerings” of the creation of ***“the new child”*** and ***“the public child” no longer “located in the private sphere of the family”***.

“The OECD and the reconciliation agenda: Competing blueprints” p24-25
<http://www.childcarecanada.org/pubs/op20/op20.pdf>).

A speech was given at the OECD's first “Starting Strong” event and published by M. Friendly that stated: “the ***“ideology of the family”*** is to be replaced by ***“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.”***

*-OECD/CRRU paper “An Integrated Approach to Early Childhood Education and Care: A Preliminary Study”<http://www.childcarecanada.org/pubs/op16/op16.pdf>, p. 3

TRY TO SELL THAT TO VOTERS. It is extremist ideologues like these who are behind policy to increase institutional care/learning. They are benefiting from “child care” funding far more than daycare staff, our children, or parents. Adopting their recommendations would further entrench this insular elitist fringe, further endanger children, and further deprive parents of the financial and socio-political wherewithal to carry out our legal responsibilities to our beloved sons and daughters.

HOPE -- REVIVE LIBERAL'S PRO-EQUALITY PARENT-POSITIVE AGENDA

The Liberal party and past government was apparently aware of these concerns - discrimination, accountability, and quality. The 1998 ***“Report of the Ad-Hoc Study Group On Valuing Caregivers”*** to the National Liberal Caucus Social Policy Committee stresses the importance of *“how infants are held, touched, fed, spoken to, sung to and gazed at.”* It goes so far as to say children need *“loving”* (p5), and that *“the health benefits of breastfeeding cannot be overstated”* (p10)

This report formed the basis of the 1999 Final Report of the Sub-Committee on Tax Equity for Families with Dependent Children which, although it dropped all mention of loving and breasts, nevertheless did keep the following 5 principles for policy.

PRINCIPLES 1999 Final Report of the Sub-Committee on Tax Equity for Families with Dependent Children p10

Find document at <http://www.kidsfirstcanada.org/tax-paper.pdf>

*Our policy should be child centred and ***promote the best interest of the child*** to the greatest extent possible.

*Our policy should presume that ***parents*** are the primary caregivers and that they ***are in the best position to determine what constitutes the best possible care arrangement for their children.***

*Our policy should provide flexibility, options and choices which will ***make it feasible for either parent to be the caregiver or to be in the paid workforce.***

*Our policy should be ***inclusive*** and responsive to the social realities, circumstances and ***preferences of parents*** and their children. Specifically, it should be sensitive to the situation of lone parents, stay-at-home parents, those with disabled children, the self-employed, students with children and those on social assistance.

*Our policy should be ***fair and equitable and neither encourage nor penalize caregiving choices.***

LOW DEMAND FOR LICENSED DAYCARE

– 90% of parents prefer parental child care, parental care was ranked #1 and daycare centres were ranked #5 preference (Vanier Inst 2004)

-Waitlists are bogus measures of demand – same names are on multiple listed, names are listed far in advance of anticipated use, names are not removed, etc.

- Vacancies: “You Bet I Care” study found over half of centres had vacancies, average vacancy rate was 8%. BC “Provincial Child Care Survey” found high vacancy rates. Toronto had an 8% vacancy rate Jan 2007 in fee-subsidy centres. CRRU reports regulated spaces for 15.5% age 0-12 (“ECEC 2004”), well in excess of the under 10% 0-12 in daycare centres.

(See article and links <http://www.kidsfirstcanada.org/supply-demand.htm>)

LOW USE OF DAYCARE CENTRES

– Under 10% of children 0-12 are in daycare centres. Statistics Canada press release (Mar 2006) states that “54% are in child care” and buries the actual fact that 14.9% of children 6 months- 5yrs in daycare centres on p97 of the 99 page study.

% OF ALL CHILDREN AGE 6-11 YRS IN DAYCARE CENTRES 1994-1995*

	A: % in all types of non-parental child care while parents 'work or study'	B: % of A in daycare centres	C: % of all in daycare centres (A X B)
Canada-wide	26%	10%	2.6%

* Statistics Canada said (March 2007) that more recent data is not available and advised using this data; this is calculated from chart published by the Vanier Institute using Statistics Canada data - *Profiling Canada's Families II* chart 69b

% OF ALL CHILDREN AGE 6 MONTHS –5 YRS IN NON- PARENTAL CHILD CARE OF ALL TYPES AND IN DAYCARE CENTRES 2002-2003

	A: % in all types of non-parental child care while parents 'work or study'	B: % of A in daycare centres	C: % of all in daycare centres (A X B)
BC	49.2%	19.8%	9.74%
Alberta	42.6%	18.6%	7.92%
Saskatchewan	54.7%	13.3%	7.28%
Manitoba	52.9%	27.1%	14.34%
Ontario	50.5%	22.2%	11.21%
Quebec	66.9%	51.9%	34.72% (21%)*
New Brunswick	56.6%	21.5%	12.17%
Nova Scotia	53.6%	24.4%	13.08%
PEI	63.4%	28.5%	18.26%
Newf and Labrador	53%	19.3%	10.23%
ALL CANADA	53.6%	27.9%	14.9%

A – data from Statistics Canada “Child Care in Canada” 2006 Table 1b p 45, Table 1 p 43
<http://www.statcan.ca/english/research/89-599-MIE/89-599-MIE2006003.pdf>

B - data from Statistics Canada “Child Care in Canada” 2006 Table 4e p. 62, Table 2 p51

*Merrigan & Lefebvre calculate 21% age 1-5 were in Quebec centres 2000-2001

-Merrigan and Lefebvre *Low Fee Regulated Childcare* p34

<http://132.203.59.36/CIRPEE/cahierscirpee/2005/files/CIRPEE05-08.pdf>

C – provincial data calculated by author using Statistics Canada “Child Care in Canada” Table 25 p 97

Embassy, March 12th, 2008

LETTERS

OECD Underestimated Early Education Funding

The oft-regurgitated OECD claim that Canada spends little on early childhood learning and care (Re: "Canada Lagging in Early Education Funding." Feb. 20) was disproved to the Senate Committee on June 6, 2007 when Shawn Tupper, director general of social policy at Human Resources and Social Development Canada, spoke to the Senate Committee on Science, Social Affairs and Technology.

Tupper showed that, in assessing Canada's expenditure, the OECD grossly underestimated by only counting spending on kindergarten. In assessing Canada but not other nations, it excluded spending on daycare, child benefits, welfare, services such as free dental care for lower income children like mine, etc.

Also excluded were the billions parents (and grandparents) spend on music lessons, hockey, and care and learning of all sorts. Also excluded was the massive opportunity costs of parents who fore-go income from a job to provide these services for their own children.

HELEN WARD

President, Kids First Parent Association of Canada,
Burnaby, BC

THE OECD and CANADA'S DAYCARE LOBBY: TIES DENIED

The Organization for Economic Co-operation and Development (OECD) ranked Canada last of 14 countries in spending on early learning and child care. Its says of its generally negative review of Canada: *"We trust... that **our external perspective**, based on many years' experience in the early childhood field, will prove to be a useful basis for discussion and progress."* [1]

But the OECD is not the trustworthy, neutral "external" body it pretends to be. It has become a co-ordinator for the international daycare lobby. It is in bed with the Canadian daycare lobby. However, this relationship has been denied by the participants.

IN BED

John Bennett, manager of the OECD review of Canada, was quoted in **Maclean's magazine saying, the OECD "relied to a great extent" on the a report – the "Background Report" – by Martha Friendly.** [2] Ms Friendly is founder and Co-ordinator of the Childcare Resource and Research Unit and a long-time leader of Canada's tax-funded daycare lobby. Gillian Doherty and Jane Beach, also long time daycare lobbyists sometimes hired by Ms Friendly, were co-authors. Their report can be found on the OECD's website [3].

In the OECD's related "Country Note" report on Canada, Ms Friendly and her colleagues were praised and thanked for their work authoring the related "Background Report":

*"In particular, we would like to acknowledge their efficient preparation of the Background Report...**A special word of thanks is due also to the authors of the Background Report –Gillian Doherty, Martha Friendly and Jane Beach.**"* [4]

The two reports are meant to form a unit:

"it is assumed that the Country Note will be read in conjunction with the Background Report of Canada, as the two documents are intended to complement one another." [5]

DENIAL AND COVER UP

Yet Friendly's involvement in the OECD's appraisal was denied and covered up by both Friendly and the OECD's Bennett.

The Dec. 5 2006 National Post ran an opinion piece that mentioned the OECD in connection with "A 2004 report, written in part by Toronto-based childcare advocate Martha Friendly". [6] Only "a report" and not specifically the "Country Note" was mentioned in this article. However, in the Dec. 8 edition Ms Friendly made the disingenuous claim, without mentioning her work on the Background Report, that : **"I neither authored, ghost-wrote nor engineered this [Country Note] report."** She did not inhale. [7]

In the same issue of the National Post, John Bennett, manager of the OECD review of Canada, also denied and covered up Ms Friendly's involvement. He stated that, **"the (OECD) report on Canada, 2004, was an external report, written by three experts from Belgium, Sweden and the United Kingdom. The statement...that the report was 'written in part by Toronto-based childcare advocate Martha Friendly' is inexact and misleading."** [8] He did not have relations with that woman.

MORE TAX-FUNDED IDEOLOGICAL TEAMWORK

There are other ties. Ms Friendly has herself been an "external" observer for the OECD review of Austria. She did this work with John Bennett [9]. Also, the "external expert" author of the report on Canada from the UK was Helen Penn of the European Commission Childcare Network. She and Ms Friendly go back

some years. She has been published by Ms Friendly's organization [10] and her work has been very influential in the tax-funded "Quality by Design" project and website headed by Ms Friendly.[11]

Ms Penn's ideological beliefs regarding "quality" in child care are disseminated through this 1999 paper published by Friendly entitled, "How should we care for babies and toddlers? An analysis of practice in out-of-home care for children under three". Ms Friendly's "Quality by Design" project and website gives further leverage to her views in the 'debate' on quality in children's care.

Penn's paper outlines her ideological rejection of both attachment theory and "empirical evidence" based on developmental science. She emphasizes the role of "values and beliefs" in formulating definitions – or re-definitions – of "quality" in daycare. Both her paper and Friendly's website emphasize the idea that "quality" is "a relevant concept", determined by policy objectives rather than by any objective evaluation of the care children actually experience. Penn feels babies and toddlers need to be trusted more to be independent with "*freedom to explore and learn out of the range of adult gaze.*" [12] Many Canadians would think such values and beliefs irresponsible idiocy.

But why the cover up of Ms Friendly's involvement in the OECD's work on Canada? Perhaps because the whole rickety assemblage of factoids, fuzzy numbers, flaky definitions and out right lies is in danger of tumbling down if the 'overwhelming research' mantra is exposed for the ideology-masking facade it is.

NOTES

[1]Canada Country Note p 18

<http://www.oecd.org/dataoecd/42/34/33850725.pdf>

[2] "Lessons in Daycare" Maclean's Nov 8, 2004

http://www.macleans.ca/article.jsp?content=20041108_91860_91860&source=srch

[3]OECD Thematic Review of Canada Background report by Friendly, Beach , Doherty

<http://www.oecd.org/dataoecd/41/36/33852192.pdf>

[4] OECD "Canada Country Note"

<http://www.oecd.org/dataoecd/42/34/33850725.pdf> p17

[5] OECD "Canada Country Note"

<http://www.oecd.org/dataoecd/42/34/33850725.pdf> p 18

[6] National Post Dec 5, 2006 p A23 "A day care plan that deserves to die" Andrea Mrozek

[7] and [8] National Post Dec.8, 2006 p A19

response by Martha Friendly and letter by John Bennett, manager of the OECD review of Canada, 2003, Paris.

[9] "Starting Strong: Early Childhood Education and Care Policy Country Note for Austria p74

<http://www.austria.gv.at/DocView.axd?CobId=18723>

[10] "How should we care for babies and toddlers? An analysis of practice in out-of-home care for children under three"

http://action.web.ca/home/crru/rsrscs_crru_full.shtml?x=33375

[11] <http://www.childcarequality.ca/index.html>

[12] p 37 "How should we care for babies and toddlers? An analysis of practice in out-of-home care for children under three" http://action.web.ca/home/crru/rsrscs_crru_full.shtml?x=33375

THE OECD: GLOBALIZING DAYCARE LOBBY IDEOLOGY

The Organization for Economic Co-operation and Development's 'finding' that Canada ranks lowest in spending on child care and early learning, and its predictable recommendations, need to be seen for what they are intended to be: propaganda tools for the domestic daycare lobby.

Yet this finding is still being milked in policy discussions: the Senate Committee on Social Affairs is writing a report on the report having heard hours of testimony from daycare lobbyists such as Child Care Child Care Advocacy Association, Martha Friendly, Dr. Fraser Mustard, and others [1].

The OECD's review of Canada comprised 2 twinned reports – a "Background Report" [2] and a "Country Note" report [3]. The "Background" paper was written by leaders of the Canadian daycare lobby, including Martha Friendly, Co-ordinator of the Childcare Resource and Referral Unit. However, both the OECD and Ms Friendly publicly denied her involvement in the project. (See article "THE OECD and CANADA'S DAYCARE LOBBY: TIES DENIED".)

Using the prestige of its staid reputation for statistical objectivity, the OECD seeks to bully member states into implementing child and family policy that suits the larger goal of labour force 'flexibility' and low wage subsidies.

Thus, according to an OECD paper entitled, "Peer Review: a Tool for Co-operation and Change," it applies what it calls "**peer review and peer pressure**". In this pursuit, **techniques such as "ranking" countries are used in order to have "an impact...on domestic public opinion, national administrations and policy makers."** [4] In short, propaganda: Canada was ranked low in order to legitimate the lobbyists demand for more money for non-parental institutional child care.

Rianne Mahon, professor at Carleton University and a leading daycare-apologist, makes this bullying tactic very clear in her paper, "The OECD and the Reconciliation Agenda: Competing Blueprints". The revealing paper was published by Ms Friendly's tax-funded organization, but unlike the OECD's paper, it was not widely publicized. Mahon herself is in general agreement with the OECD's effort to eridicate policies favourable to parental child care. Concerning its practice of "ranking" countries she states:

*"broad policy documents certainly contribute to **shaping the social policy paradigm of member states**. It is through the publication of **country-specific assessments, however, that the OECD is able to employ the "name and shame" instrument of peer review to press "laggards" to learn.**" [5]*

In an attempt to cover up the OECD's social paradigm shaping machinations, John Bennett, head of the OECD's review of Canada, claimed in a letter to the National Post that, "*The OECD has no bias, conscious or unconscious, against families taking care of their own children.*" [6]

This is demonstrably false. At events like the OECD colloquium bluntly titled, "Putting More Women to Work [sic]," OECD experts are clear that they promote funding daycare over parental care: "*Childcare subsidies – conditioned on female [Labour Force] participation - are better than child benefits*" [7].

At the OECD's first "Starting Strong" event, a speech was made and later published by Ms Friendly that set out the vast ambition of the Utopian social mega-project. It advocated against the "**ideology of the family**" and for "**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." We need a "paradigm shift" to the "view of ECEC as a shared responsibility

*between the family and the state,[however] in many countries the state is still reluctant to **intervene in the family domain**”[8].*

Mahon also makes it clear that the OECD is not neutral at all, it:

* is “*an active participant in the push to eliminate the last vestiges of maternalism*”[9].

* “*counsels the rejection of maternalism in favour of supports for the new dual earner (or lone parent earner) family.*” [10]

* “*counsels the establishment of an ECEC system that would offer quality care to all children, irrespective of the labour market status of their parents.*” [11].

* it rejects “*neo-familialism’s long [maternity and parental] leaves... as destructive of mothers’ human capital and weakening their labour market attachment.*”

* “*countries are encouraged to move to individual, rather than family, taxation*”

* for lone parents “*The ‘welfare to work’ orientation is to be embraced by all*” [12].

BLURRING THE BOUNDARIES: MATING ACADEMICS AND ADVOCATES TO CONCEIVE THE “NEW PUBLIC CHILD”

If any doubts remain about the ideological motivations and the lack of objectivity at the OECD when it comes to early childhood education and care (ECEC), Mahon makes it quite clear. The following quotes excerpted from her paper’s conclusion explain how the “ideas and values” of ideology-based daycare “advocates” are central, and how its ‘review’ of countries’ policies are intended to be used to advance the anti-parental child care agenda:

* “*The [OECD’s] ECEC unit’s perspective represents more of a challenge to the status quo. It is not as well-placed as the family friendly unit in DELSA, however. It reports to a smaller, more narrowly focused (education) Directorate....**Its potential strength comes from the way it structured the review process. It carried out its work in such a way as to draw in and develop a transnational network of early childhood specialists and advocates.***”

* “**It thus blurred the boundary between epistemic communities, made up of experts linked by cognitive and professional ties (Haas, 1992), and transnational advocacy networks** – “*networks of activists, distinguishable largely by the centrality of principled ideas or values in motivating their formation.*”

* “*In this it has built on, and extended, the earlier work of the European Commission’s Childcare Network [of which Friendly’s associate Helen Penn is a leader]. **Just as the latter forged links among child care advocates operating at different scales – local and national – adding the European, the ECEC branch has done the same across the OECD.***”

* “**Its success, of course, will depend on the capacity of advocates to make good use of these reports in their struggles.**”

* “*Part of the hope may lie...in countries where “**the long default position of the child located in the private sphere of the family is being disturbed by some glimmerings of the ‘public child’, replete with***

voice, rights and citizenship” (2004: 211). Yet this “new child” will need allies which might be found, inter alia, in recharged feminist and trade union movements.” [13]

The OECD and the Canadian daycare lobby can keep their fantastical ‘new’ ‘public child’. Canadian child policy should be based on reality and the democratic will of Canadians, not the statist solutions of unaccountable ideologues.

NOTES

[1] see “The state of early learning and child care in Canada” at http://www.parl.gc.ca/common/Committee_SenProceed.asp?Language=E&parl=39&Ses=1&comm_id=47

and http://www.parl.gc.ca/39/2/parlbus/commbus/senate/Com-e/soci-e/45189-e.htm?Language=E&Parl=39&Ses=2&comm_id=47

[2] OECD Thematic Review of Canada Background report by Friendly, Beach , Doherty <http://www.oecd.org/dataoecd/41/36/33852192.pdf>

[3] Canada Country Note <http://www.oecd.org/dataoecd/42/34/33850725.pdf>

[4] “PEER REVIEW: A TOOL FOR CO-OPERATION AND CHANGE An Analysis of an OECD Working Method” by Fabrizio Pagani. OECD GENERAL SECRETARIAT DIRECTORATE FOR LEGAL AFFAIRS <http://www.oecd.org/dataoecd/33/16/1955285.pdf>

[5] “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 <http://www.childcarecanada.org/pubs/op20/op20.pdf>

[6] National Post Dec.8, 2006 p A19 letter by John Bennett, manager of the OECD review of Canada, 2003, Paris.

[7] p10 “Prospects for female participation in an ageing world” Jean-Marc Burniaux, Economics Department, OECD, Paris <http://www.oecd.org/dataoecd/53/47/31458376.pdf>

[8] “An Integrated Approach to Early Childhood Education and Care: A Preliminary Study” by Lenira Haddad published by the Childcare Resource & Research Unit Unit, Occasional Paper # 16 p. 3,6,9 <http://www.childcarecanada.org/pubs/op16/op16.pdf>,

[9] p. 23 “The OECD and the reconciliation agenda: Competing blueprints” published by the Childcare Resource & Research Unit University of Toronto Occasional Paper # 20 <http://www.childcarecanada.org/pubs/op20/op20.pdf>

[10] p 13 ibid

[11] p.22 ibid

[12] p.15 ibid

[13] pp. 24-25 ibid