

April 8, 2021

Social Planning Department
City of Burnaby
4949 Canada Way
Burnaby, BC

Dear Social Planning Department,

Thank you for the opportunity to provide comment on the development of the City of Burnaby's "Burnaby Child Care Action Plan."

For many years, the Burnaby Board of Trade has seen child care as not a family issue or a women's issue, but an economic and workforce issue. The COVID-19 pandemic has made this even more apparent as employers of all sizes and sectors saw workers struggle to remain productive and attached to the workforce while also providing childcare or educational services for their children.

The ongoing availability of childcare, through both private and non-profit childcare providers, will be a pivotal determinant in our economic recovery – if parents continue to struggle to find childcare for their children then they will simply not be available to fully participate in the labour force, serving as a drag on our economic growth.

Overall, the Burnaby Board of Trade is supportive of the goals of the "Burnaby Child Care Action Plan" as laid out in the current draft, and we support the 27 actions and recommendations proposed to help address gaps in the provision of child care services in our city.

Specifically, we would like to draw attention to five areas in which we have additional comments and thoughts and share with you: a focus on accessibility; zoning and regulatory flexibility; the child care labour force; embracing the role of private providers; and working with the business community.

A focus on accessibility

We second the results of your community consultation process that found accessibility to be the top concern, and encourage the bulk of the City's efforts to focus on ways to expedite the creation of more net, new child care spaces. We believe that all other concerns – affordability, flexibility, quality – can only be properly addressed provided there is adequate supply of child care spaces in the first place. For example, lowering child care rates to make them more affordable will be of little good if parents can't actually find any of these cheaper spaces for their children.

Zoning and regulatory flexibility

We feel zoning and regulatory changes could have an important impact on the development of child care services, and we encourage the City to act itself, or in concert with other levels of government where necessary or appropriate, to explore or implement regulatory reforms including:

- increasing opportunities for the development of childcare including in Business Centre areas and other areas
- removing the requirement for home-based child care operators to be residents of the dwellings used;
- providing flexibility in the outdoor space requirement for childcare; and
- exploring increasing the educator-child ratio.

First, as noted in “Increasing Accessibility Action #4,” the Burnaby Board of Trade encourages the City to review its zoning bylaws to find ways of increasing opportunities to create more child care spaces generally, but particularly in new and existing commercial space in the city’s Business Centre areas. As these Business Centre areas develop, there may be opportunities to provide increased child care spaces care which would potentially be closer to parents’ places of employment. In addition, the shift to remote work due to COVID-19 may result in an increase in available space at employers’ worksites, and the provision of childcare may be an effective and valuable way of utilizing that additional capacity if regulatory processes are simple and straightforward. In addition to Business Centres, we encourage the City to actively explore the feasibility of adding or allowing childcare in other areas outside of the traditional settings of purpose built, home-based, or at-school locations, such as in other civic facilities or developments.

Second, the City of Burnaby currently requires the operator of a home-based child care centre to actually be a resident of the dwelling being used. This creates an obstacle to establishing more home-based child care in residential areas, which are an important part of the local child care landscape. The focus should instead be on ensuring staffing is appropriately trained and the centre operates in a manner conducive to its residential setting, regardless of whether the staff or operator lives in the dwelling. Allowing property owners to establish home-based child care centres without having to be a physical resident would make it easier for more of these types of centres to be established.

Third, as noted in “Strengthening Partnerships Action #3,” the City should work with and advocate to other levels of government to explore easing regulations that may constrain the development of new child care spaces such as the outdoor play space requirement. Currently, provincial legislation requires 6 square metres of outdoor play space for each child in care, which limits the existing sites into which child care could be added, and adds to the costs of purpose-built child care space development. Reducing this requirement, or providing flexibility for child care centres which may have adjacent green spaces or parks, could make it easier and more viable to establish new child care centres.

Fourth, in light of the dire need for increased child care capacity, it may be worth revisiting whether the current child-to-educator ratio limits are appropriate across all child care types and settings. Currently, for group, occasional, multi-age, and in-home child care, one trained educator is generally allowed to provide care for up to 8 children. The Burnaby Board of Trade does not believe reviewing this criteria for infant or toddler age groups would be appropriate, but for older age cohorts it could be one way of providing immediate increased capacity in the child care system. We would encourage the City advocate to and work with the provincial government to explore this regulatory review.

The child care labour force

The Burnaby Board of Trade is pleased the City recognizes the importance of the child care labour force in providing child care services, as evidenced by the inclusion of “Strengthening Partnerships Action #1.” Any increase in childcare spaces depends on having an adequate supply of early childhood educators with which to staff them. A scenario where investment in creating new child care spaces outstrips educator supply is not unfathomable.

Therefore, the Burnaby Board of Trade is advocating to the provincial government that it continue its Early Care and Learning Recruitment and Retention Strategy and invest in both traditional educational paths for early childhood educators – with tuition or cost incentives to drive enrollment – as well as non-traditional paths such as re-training and re-tooling workers who may be permanently or semi-permanently displaced from the workforce due to the COVID-19 pandemic and its lingering effects. We would welcome the City’s involvement in supporting the provincial government’s Early Care and Learning Recruitment and Retention Strategy and in other initiatives to bolster educator supply.

Embracing the role of private providers

Private child care providers will play an important role in solving our child care challenges, and the Burnaby Board of Trade encourages the City to find ways of more fully engaging with and supporting this sector through the actions of the “Burnaby Child Care Action Plan.”

Several actions in the Action Plan, including “Increasing Accessibility Action #10” which proposes an expedited application process and “Improving Affordability Action #1” which proposes application fee reductions, are suggested only for not-for-profit child care facilities. While some government supports, such as direct financial grants or providing space through the Community Benefit Bonus Policy, would not be appropriate for private operators, there is little reason administrative relief such as referenced here could not be extended to private operators given the child care needs of our community. We encourage the City to accept and embrace the role of the private sector in providing some of the child care spaces needed in our community and to aim to support their growth as well through the Action Plan.

Working with the business community

As noted above, child care is an economic issue and as such, employers have an interest and a stake in it. As the representative of the Burnaby business community, the Burnaby Board of Trade is eager to continue to find ways of partnering with the City of Burnaby, the Child Care Resources Group, and other local stakeholders to support child care development and the implementation this Action Plan.

The Burnaby Board of Trade has provided resources and best practices to our members to support the implementation of family-friendly policies, and to disseminate information on child care resources and supports for their employees. We would welcome continued opportunities to do this.

In addition, and as noted above, we anticipate more employers may be willing to explore employer-based child care in the post-pandemic workplace than ever before. Unfortunately, the examples today of successful employer-based childcare are too few and far between, and we feel there is an opportunity to address that by promoting employer-based child care to the business community and to provide the information and resources necessary for them to consider it.

In summary, we are generally supportive of the recommendations contained in the report, and would encourage the City to consider the further thoughts outlined above around prioritizing accessibility, providing zoning and regulatory flexibility, supporting the child care labour force, and welcoming the participation of both private child care providers and the broader business community. Thank you again for the opportunity to comment on the draft “Burnaby Child Care Action Plan” and I would welcome any further engagement on this topic.

Sincerely,



Paul Holden
President & CEO
Burnaby Board of Trade