

Mr. Michael Mitchell and Honourable John Murray  
Special Advisors  
Changing Workplaces Review  
ELCPB 400 University Ave., 12<sup>th</sup> Floor  
Toronto, Ontario M7A 1T7  
[CWR.SpecialAdvisors@ontario.ca](mailto:CWR.SpecialAdvisors@ontario.ca)

October 12, 2016

**Re: Submission to the Changing Workplaces Review on the Interim Report**

Dear Mr. Mitchell and Hon. Murray:

The Association of Ontario Health Centres (AOHC) is the voice of community-governed primary health care in Ontario. AOHC's vision is the best possible health and wellbeing for everyone living in Ontario. We know that good, secure jobs with fair wages, extended benefits and healthy working conditions all contribute to health and wellbeing for people and communities. Strong and effective legislation is essential to govern workplaces and ensure good wages and working conditions with rules that protect everyone.

AOHC members include 108 Community Health Centres (CHCs), Aboriginal Health Access Centres (AHACs), Community Family Health Teams (CFHTs), and Nurse Practitioner-led Clinics (NPLCs) across the province.

About 54% of people served by CHCs are low income – many of these people are in precarious jobs where they work for low wages in part-time, temporary or contract positions without employment benefits or workplace protection. So health service providers in CHCs see firsthand the impact of precarious work on the physical health, mental health and overall wellbeing of the people we serve.

But as health service providers we can only go so far in addressing the determinants of health – we need upstream interventions with public policies that promote good jobs, secure incomes and healthy working conditions. That is why AOHC has provided input to the Changing Workplaces Review. We are watching closely as you develop recommendations to the Ontario government on how the Employment Standards Act and Labour Relations Act could be amended to better protect workers while supporting businesses in our changing economy.

We are calling on you to reject options that will introduce more precarious working conditions to Ontario's labour market and instead recommend a bold and comprehensive vision that addresses the structural sources of precarious employment. We cannot expect to fix systemic labour market problems with band-aid solutions.

We are heartened that you have correctly identified changing business practices as a source of precarious work. We note that many of these practices stem from the many exemptions and loopholes that make it possible for employers to evade their responsibilities under the law. Accordingly, we need to close the gaps in legislation that contribute to precarious work and that, left unchecked, will continue to exert downward pressure on the wages and working conditions of all of us.

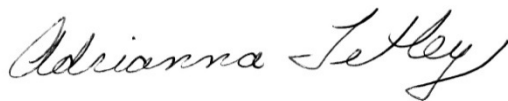
In addition to raising minimum standards for all workers, we must also reduce the barriers to collective bargaining that exclude most people in precarious work.

The Workers' Action Centre and Parkdale Community Legal Services have provided a full review of the Advisors' Interim Report in their submission, "Building Decent Jobs from the Ground Up." The Association of Ontario Health Centres supports and endorses the recommendations made in their submission to improve wages and working conditions.

In particular, we join with them in calling for changes to the Employment Standards Act to require employers to provide paid sick days equivalent to one hour for every thirty-five hours worked, up to a cap of seven paid sick days (pro-rated for part time employees). There should be no qualifying period before an employee is entitled to sick leave. Medical notes should not be required when employees take paid sick leave.

We look forward to your final report and recommendations to the Ontario government.

Yours sincerely,

A handwritten signature in cursive script that reads "Adrianna Tetley".

Adrianna Tetley,  
CEO, Association of Ontario Health Centres