



Sudbury & District

## Health Unit

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October 13, 2016

*VIA EMAIL*

Mr. Michael Mitchell and Honourable John Murray  
Special Advisors  
Changing Workplaces Review  
ELCPB 400 University Ave., 12<sup>th</sup> Floor  
Toronto, ON M7A 1T7

Dear Mr. Mitchell and Hon. Murray:

Re: Comments on the Changing Workplaces Review Interim Report

I am the Medical Officer of Health and CEO for the Sudbury & District Health Unit (SDHU), an organization that employs over 250 employees including two unionized groups. The SDHU serves the nearly 200,000 people who live in the City of Greater Sudbury and the districts of Sudbury and Manitoulin. We deliver provincially mandated public health programs and services to prevent disease and promote health – ultimately to reduce people's need for health care. Central to the health of area residents (and all Ontarians) is the workplace. Workplaces are a critical determinant of health, and the health promoting or health damaging nature of workplaces impacts all workers, their families, neighbourhoods, communities and society.

The Changing Workplaces Review (CWR) provides an unprecedented opportunity to tackle the root causes of precarious work. As the appointed Advisors to the CWR, you were asked by the government to address why “far too many workers are experiencing greater precariousness” today in Ontario.

We are calling on you to reject options that will introduce more precarity to Ontario's labour market and instead recommend a bold and comprehensive vision that uproots 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 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. We would also like to emphasize the importance of raising minimum standards for precarious workers through the creation of better training opportunities.

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

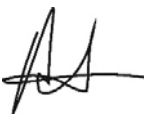
Further, we would recommend you to consider adopting the World Health Organization's (WHO) definition of a healthy workplace in moving forward with finalizing the CWR as stated here:

*A healthy workplace is one in which workers and managers collaborate to use a continual improvement process to protect and promote the health, safety and well-being of all workers and the sustainability of the workplace by considering the following, based on identified needs:*

- *health and safety concerns in the physical work environment;*
- *health, safety and well-being concerns in the psychosocial work environment including organization of work and workplace culture;*
- *personal health resources in the workplace; and*
- *ways of participating in the community to improve the health of workers, their families and other members of the community<sup>i</sup>.*

With this in mind, we would urge that any proposed changes to the Labour Relations Act, 1995 (LRA) and Employment Standards Act, 2000 (ESA) be subject to "healthy workplace impact assessment" – meaning that all proposed changes should be carefully assessed to determine if they might be expected to improve the health of the workplace using this WHO definition. This should also include systematic evaluation and monitoring of the health impacts of any recommended ESA and LRA changes.

Sincerely,



Penny Sutcliffe, MD, MHSc, FRCPC  
Medical Officer of Health and Chief Executive Officer

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<sup>i</sup> Burton, J. (2010). *WHO healthy workplace framework and model: Background and supporting literature and practices*. Retrieved October 12, 2016 from [http://www.who.int/occupational\\_health/healthy\\_workplace\\_framework.pdf](http://www.who.int/occupational_health/healthy_workplace_framework.pdf)