

Guelph & Wellington Task Force for Poverty Elimination
160 Chancellors Way
Guelph ON N1G 0E1

June 25, 2015

Changing Workplace Review
Employment Labour and Corporate Policy Branch
Ministry of Labour
400 University Ave., 12th Floor
Toronto ON M7A 1T7

Dear Special Advisors to the Changing Workplace Review:

The Guelph & Wellington Task Force for Poverty Elimination works collaboratively, informed by diverse voices of experience, to take local action and advocate for system and policy change to address the root causes of poverty. One of our current priorities is income security with the goal that everyone in Guelph & Wellington has the income, resources, and opportunities to fully participate in the community.

Over the past few years, we have had the opportunity to consult with key stakeholders and community members and provide submissions to the province on issues such as social assistance and the minimum wage. We are pleased that the province has provided another opportunity to provide comments, ideas and suggestions, as part of the Changing Workplace Review. The following submission outlines how the Poverty Task Force (PTF) thinks the “Labour Relations Act (LRA) and Employment Standards Act (ESA) could be amended to best protect workers while supporting businesses in our changing economy.”ⁱ

A recent report by the Canadian Centre for Policy Alternatives (CCPA), *Higher Standard: The case for holding low-wage employers in Ontario to a higher standard*, provides a thorough picture of low-wage workers in Ontario. The report notes that there is a rising prevalence of low-wage work, variable hours for low-wage workers, and inadequate access to leaves in precarious jobs.ⁱⁱ Despite Guelph having a low unemployment rate (3.9%), our community is very much affected by the provincial trends outlined by the CCPA.

The CCPA report suggests several amendments to the ESA to regulate work scheduling and to extend access to leaves. These recommendations include:ⁱⁱⁱ

- Provide two weeks’ advance posting of work schedules
- Protect workers from reprisals if they request a change in schedule with at least two weeks notice
- Extend access to emergency leave
- Provide for paid sick leave
- Increase paid vacation entitlements

The PTF supports these recommendations and encourages the consideration of the Special Advisors to the Changing Workplace Review.

A report by the Workers' Action Centre (WAC), *Still working on the edge: Building decent jobs from the ground up*, provides additional insights into the precariousness of the labour market and does an exemplary job of including the voices of low-wage workers. The PTF believes that it is critical that these experiences shape the outcomes of Changing Workplace Review.

The report by the WAC includes a comprehensive list of recommendations that are all worthy of consideration by the Special Advisors. **The PTF would like to draw attention to and support the following:**^{iv}

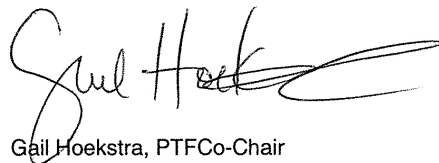
- There should be no differential treatment in pay and working conditions for workers who are doing the same work but are classified differently, such as part time, contract, temporary, or casual (recommendation 2.4)
- Ensure that temp agency workers receive the same wages, benefits and working conditions as workers hired directly by the company (recommendation 2.6)
- Prohibit long-term temporary assignments. Require that agency workers can become directly hired employees after working a cumulative total of six months for the client company (recommendation 2.6)
- Increase paid vacation entitlement to three weeks per year. After five years of service, increase paid vacation to four weeks per year (recommendation 3.6)
- All workers should receive a written contract on or before the first day of employment setting out terms and conditions, including expected hours of work (recommendation 3.8)
- All employees shall accrue a minimum of one hour of paid sick time for every 35 hours worked up to a maximum of 52 hours of paid sick time in a calendar year. (recommendation 3.12)
- Repeal occupational exemptions to minimum wage (recommendation 7.2)
- Repeal student minimum wage (recommendation 7.4)

The PTF would like to acknowledge the extensive work by the CCPA and WAC in highlighting the issues with the Employment Standards Act and the Labour Relations Act that are under review by the Changing Workplace Review. Their recommendations are well informed by both statistical analysis and voices of low-wage workers. We are confident that consideration of this work by the Special Advisors and the implementation of its recommendations will lead to positive change for community members in Guelph and Wellington.

Kind regards,



Stuart Beumer, PTF Co-Chair



Gail Hoekstra, PTF Co-Chair

Works Cited

Block, Sheila. "A higher standard: The case for holding low-wage employers in Ontario to a higher standard." June 2015. Canadian Centre for Policy Alternatives. 8 June 2015 <<https://www.policyalternatives.ca/higher-standard>>.

Ministry of Labour. Consultation: The Changing Workplace Review. 14 May 2015. 18 June 2015 <<http://www.labour.gov.on.ca/english/about/workplace/consultation.php>>.

Workers' Action Centre. "Still working on the edge: Building decent jobs from the ground up." March 2015. Workers' Action Centre. 8 June 2015 <http://www.workersactioncentre.org/wp-content/uploads/dlm_uploads/2015/03/StillWorkingOnTheEdge-WorkersActionCentre.pdf>.

ⁱ (Ministry of Labour)

ⁱⁱ (Block)

ⁱⁱⁱ (Block)

^{iv} (Workers' Action Centre)