



Social Planning Toronto  
2 Carlton Street, Suite 1001  
Toronto, ON M5B 1J3  
Tel: (416) 351-0095  
Fax: (416) 351-0107

Contact: Mohammad Araf  
Email: [maraf@socialplanningtoronto.org](mailto:maraf@socialplanningtoronto.org)  
Phone: (416) 351-0095 x256

**Re: The Changing Workplaces Review**

**September 15, 2015**

Dear Mr. Michael Mitchell and Honourable John Murray:

Social Planning Toronto (SPT) welcomes the Ontario Ministry of Labour's *Changing Workplaces Review* and is pleased that the Ontario government has recognized the urgent need to review our labour laws to better protect workers. SPT is submitting this letter to endorse the recommendations put forth by the Workers' Action Centre's *Still Working on the Edge*<sup>i</sup> report and the demands of the *Fight for \$15 and Fairness*<sup>ii</sup> Campaign.

In this submission, we would like to specifically highlight the need for our labour laws to address the rise of precarious work and to protect precarious workers. By now, it is evident to all that the rise of precarious employment has been a disturbing trend in Ontario's labour market. This type of employment is often unstable, low-paid, involve poor working conditions, and provide little to no health benefits, sick pay or pensions. Precarious work is especially prevalent in the Greater Toronto Area and Hamilton. According to a report by *Poverty and Employment Precarity in South Ontario*<sup>iii</sup> (PEPSO) project which was published earlier this year, nearly 52% of working adults are in precarious and part-time jobs. These jobs often have adverse impacts on health, well-being and community participation of individuals and families. The PEPSO report alerts us that many precarious workers are trapped, and have a hard time moving into better opportunities.

In general, the income gap between those in secure and precarious employment is 51%. A *Metcalf Foundation* report<sup>iv</sup> released in 2015 mapped working poverty in Toronto, and found that between 2006 and 2012, the working poor population increased by almost 11%. Therefore, we are witnessing more and more people who cannot make ends meet through employment. Low-paying, insecure jobs disproportionately affect the health and well-being of equity-seeking groups. Considering this harsh reality in our labour market and workplaces, the review of our

labour laws is a much-needed measure to contain and reverse some of the detrimental effects of precarious employment on the lives of working individuals and their families.

To begin, workers in our province need a \$15 minimum wage. In Toronto alone, one in four individuals lives in poverty. A report<sup>v</sup> by *Social Planning Toronto, Children's Aid Society of Toronto* and *Alliance for a Poverty-free Toronto* in 2014 found that 29% of children in Toronto live in low-income families. The current hourly minimum wage of \$11, which is what over half a million workers in Ontario are paid, falls 17% below the poverty line. We need at least a \$15 minimum wage to lift Ontario workers out of poverty. According to a vast majority of academic and non-academic research<sup>vi</sup>, not only do higher minimum wages have the potential to reduce poverty and close the inequality gap, but they are also good for businesses, reducing staff turn-over and costs associated with training new employees. We also know that many employers who hire minimum wage workers can afford to pay \$15 an hour. A recent report<sup>vii</sup> by *Social Planning Toronto* in 2013 found that 89% of minimum wage workers are employed by large firms with over 500 employees and medium size businesses with 100-500 employees.

Furthermore, the *Employment Standards Act (ESA)*, as it currently stands, fails to address and regulate the growing predominance of precarious work. For example, employers are not prohibited from paying part-time and temp agency workers lower wages. According to a report published by *Canadian Centre for Policy Alternatives* in 2014<sup>viii</sup>, the number of part-time and temp agency jobs have increased faster than full-time work since the year 2000. Part-time jobs grew by 25% and temp agency jobs by 40% while full-time jobs increased only by 16%. We also know that many part-time jobs are involuntary as the same report found that 32% of part-time workers preferred to work full-time. As a consequence of failure to regulate part-time work, there is a huge gap between median hourly wages of part-time and full-time workers. The median hourly wage of part-time workers in Ontario is just above \$12 whereas it is \$24 for their full-time counterparts. We need to ensure that part-time and temp workers doing jobs of comparable value to that of their full-time counterparts are paid equal wages. Discrimination on the basis of employment status contributes to income inequality. The EU adopted a *Framework Agreement on Part-Time Work*<sup>ix</sup> in 1997 which requires that part-time workers may not be discriminated against. The agreement aims at improving the conditions of part-time work and to facilitate flexible organization of work in a way that addresses the needs of both employers and employees. An "equal pay for equal work" principle is also in line with Premier Kathleen Wynne's mandate to reduce the gender wage gap<sup>x</sup>. We do know that women are more likely than men to work part-time and often choose to work part-time in order to care for children.

Other measures to better protect precarious and part-time workers include the right for decent hours of work and the right to refuse work beyond 40 hours without risking one's job. Presently, employers have extensive control over their employees' hours of work and schedules. For instance, many workers do not get enough hours of work and others who work too many hours are often deprived of overtime pay. The *Employment Standards Act (ESA)* should

ensure that employees have the right to refuse work beyond 40 hours a week or are paid overtime. The *Act* should also be clear about predictability of hours of work. Many part-time, casual and temp agency workers receive no guarantee of minimum hours of work per day and have irregular, erratic schedules, which leaves many workers in a difficult position to plan their personal lives or take up another job to make ends meet. We support the *Fight for \$15 and Fairness* campaign's demand that the ESA should require a minimum shift per day of three hours for casual and part-time employees, and that workers should have the right to know, two weeks in advance, how many hours they expect to work in a given week. We also stand in support of the campaign's demand that part-time, casual and temp workers be provided with at least 7 paid sick days, opportunities to promote to permanent, full-time positions, and protection from unjust dismissal. In addition, all exemptions and special rules in the *Act* that exclude specific groups of workers from protections need to be repealed so that all workers are protected by the law.

Employment plays an important role in poverty reduction, and stronger employment standards and protections ensure fairness at workplaces. We are grateful to the Ontario Ministry of Labour for launching the Changing Workplaces Review. We stand in support of the *Fight for \$15 and Fairness* campaign: we recognize the need to raise the minimum wage at \$15 to lift over half a million workers in Ontario out of poverty. We need to ensure, through our labour laws, that workers are not discriminated against based on their employment status and that employers are held to a higher standard.

---

[About Social Planning Toronto:](#) For more than sixty-five years, SPT and its predecessor organizations have served as a vital voice for the non-profit community sector in Toronto – conducting research and supporting community mobilization that has made a real difference for our organizations, our communities, and the most vulnerable residents in our city.

Social Planning Toronto is committed to building a civic society: one in which diversity, equity, social and economic justice, interdependence and active civic participation are central to all aspects of our lives - in our families, neighbourhoods, voluntary and recreational activities, at work and in politics.

---

<sup>i</sup> Gellatly, M. (2015). *Still Working on the Edge: Building Decent Jobs from the Ground up*.

To view the full report, click [here](#).

<sup>ii</sup> Campaign website: [www.15andfairness.org](http://www.15andfairness.org)

<sup>iii</sup> Lewchuk, W. et al. (2015). *The Precarity Penalty: The Impact of Employment Precarity on Individuals, Households, and Communities – and What to Do about It*.

Click [here](#) to see the full report.

<sup>iv</sup> Stapleton, J. et al. (2015) *The Working Poor in the Toronto Region*.

To see the summary of the report, click [here](#).

<sup>v</sup> Panalyi, M. et al. (2014). *The Hidden Epidemic: A Report on Child and Family Poverty in Toronto*.

View the report [here](#).

<sup>vi</sup> Some of these reports include:

- Green, A. D. (2015). *The Case for Increasing Minimum Wage*. Canadian Centre for Policy Alternatives.

- Brochu, Pierre, and David A. Green (2013). *Minimum Wages: The Effects on Employment and Labour-force Turnover*.

- Ian Hussey. (2015). *The Case for a \$15 Minimum Wage in Alberta*. Canadian Dimension.

<sup>vii</sup> Social Planning Toronto. (2014). *Where are Minimum Wage Earners in Ontario Working? An Analysis of Minimum Wage Employment and Firm Size*. <http://www.socialplanningtoronto.org/wp-content/uploads/2014/11/Min-wage-November-25.pdf>

<sup>viii</sup> Tiessen, K. (2014). *Seismic Shift: Ontario's Changing Labour Market*. Canadian Centre for Policy Alternative. See report [here](#).

<sup>ix</sup> Read more about the *framework* [here](#).

<sup>x</sup> <http://www.payequity.gov.on.ca/en/about/pubs/genderwage/wagegap.php>