

Changing Workplaces Review  
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**Submission of the West Neighbourhood House (formerly St. Christopher House)  
Community Advisory Group on Social Issues  
to the Changing Workplace Review**

The Community Advisory Group on Social Issues (CAGSI) is a group of 12 community members reflecting the diversity of age, socio-economic and ethno-cultural groups living in the south-west corner of the old city of Toronto. The group is made up of participant community leaders identified from the membership of West Neighbourhood House (West NH) programs. CAGSI helps inform the board and the senior staff of West NH on different social issues, (e.g. affordable housing), help develop policy analysis and reforms with West NH and governments and other agencies and coalitions (e.g. a universal child care program), help West NH get feedback and engage other community members in social change processes, (e.g. help organize and facilitate Town Hall meetings), help West NH educate or engage the public on social issues and reforms (e.g. talk with media, speak with politicians/bureaucrats, participate in various social policy processes).

West NH is a neighbourhood based multi-service centre serving a population base of over 110,000 people and providing services and supports to over 16,000 people per year with over 230 staff and over 1200 volunteers. Examples of West NH programs include;

- a music school for children, youth and adults
- programs for children, youth and families
- services for the homeless and at-risk
- computer and internet access and instruction
- employment and adult learning programs
- newcomer and immigrant services
- financial empowerment and problem solving
- a continuum of services for seniors from the well elderly to the frail

The following input into the review reflect a group process designed to generate a common perspective from a range of life experiences including many individuals who are or have recently been on Ontario Works (OW) or the Ontario Disability Support Program (ODSP) as well as low-income seniors, newcomer families, students, working poor and precariously employed. CAGSI members also formally and informally engaged other low income community members who are program participants at West NH or live in the community.

CAGSI has also worked with policy experts and other community leaders in the past to integrate their experience and knowledge in the development of social policy. Even so, we are not policy experts. Our points offer context and direction, not technical details. Some of the group members, community members and policy experts we have engaged and consulted have forwarded personal comments and/or institutional submissions that reflect more specific recommendations.

The perspective of precarious employed and vulnerable workers were also central to CAGSI input into provincial poverty reduction consultations. The ability of the province to create a regulatory environment in conjunction with labour market strategies that address the growing number of working poor will likely affect the provinces ability to reach its poverty reduction targets.

First and foremost CAGSI members feel the Province of Ontario need to be champions and leaders in bringing the federal government, other provinces and our municipalities together in comprehensive, concerted and coordinated labour market development and adjustment policies and programs that aggressively begin to facilitate a labour market that provide living wages and basic health and income security benefits. Accessible and affordable skills development, training and childcare programs will also affect what constitutes a living wage as education related debt, settlement costs and childcare costs can consume an onerous amount of the wages in many sectors of the economy.

The provinces intent to realign policy with new realities as reflexed in recent reviews of affordable housing and consumer protection demonstrate the government is listening to vulnerable populations and is leading public dialogues that locate our collective prosperity in our collective ability to create the conditions and the foundations for all of us to fulfill our potential and contribute to healthier and stronger economies and communities.

Though this process is framed as an employment standards review, the interplay of other socio-economic forces will intersect with any strategy. We need all the tools at the disposal of all governments that can help reverse and redirect the growing gap in income and assets that is an overarching context that shapes the growth of precarious employment in our neighbourhood.

The current trend in employment for CAGSI members, their friends, family and neighbours is jobs that don't pay a living wage and often leave them worse off if they lose important benefits attached to Ontario Works or the Ontario Disability Support Program. Others find themselves involuntary misclassified as self-employed with little capacity to challenge the designation. Others spoke to the demand for flexibility in scheduling which compromises their family and community responsibilities. Other members of the group spoke to the cost of post-secondary education and the risk of not being able to find a job that will let them pay of their debt.

These work experiences also begin to affect people's sense of the possibility of being able to get ahead in life, of being able to have or build a decent quality of life. Being able to start a family or provide a solid foundation for the life chances of their children, being able to buy a home or save for a rainy day or retirement seem further and further away. Group members felt that the opportunities in life that shaped our sense of country and community, or the opportunities provided to our forefathers and mothers will not be available to more and more people. Life for vulnerable workers appears increasingly unfair and a sense of solidarity, collective risk and reward does not seem viable without our democratic institutions ensuring that all have a fair and equal opportunity to be full citizens and contributors to society. Employment standards reform and modernization will be a critical component in helping to create labour relations that provide a basic standard to build healthy lives, economy and society.

CAGSI feedback does not offer specific or technical advice as it relates to the questions in the Guide. It provides a direction for reform rather than specific recommendations to the questions. CAGSI recognizes that there are multiple dynamics influencing the labour market which must be balanced in designing policy and regulation. Our starting viewpoint is that the Employment Standards Act (ESA) is not balanced now as low income and vulnerable workers effectively do not have the means and capacity to exercise their rights and enjoy a reasonable standard of living.

The review identifies efficiency, equity and voice as the objectives. Another objective should be that "someone working full time and full year should be earning a living wage and benefits and not subject to working conditions that puts them or their dependants at risk". As well, protection and remedies for breach of employment contracts should recognize and compensate for material and sociological barriers to accessing human and employment rights associated with employment.

CAGSI feels that many businesses have profited from the lack of modernization of labour law in the modern economy. Many businesses have exploited new forms of employment and the lack of Ministry of Labour enforcement capacity to gain a competitive advantage over other firms with traditional/standard employment relationships. Leveling the playing field by bringing precarious workers more clearly under ESA will create fairer relations and a leveler playing field between employers and employees and between employers and between employees.

A failure to rebalance and modernize ESA based on current trends will inevitably result in most workers effectively being self-employed with little protection under the law. The following suggestions offer directions that would rebalance the relationship between employers and employees:

- a) Minimum wages while not directly considered in this review must be aligned and indexed to the cost of living for a single person. Other social or economic programs or instruments (e.g. refundable tax credits) must be aligned with minimum wages to ensure that economic families with dependants can also provide a decent life for households with minimum wage provider/s.

b) Low-income and precarious workers effectively have fewer rights as they are impractical or impossible to exercise in their context (lack time or money required and risks associated with challenging their employer). In the absence of economic parity, the Ministry of Labour itself must provide directly or indirectly the support employees need seeking the rights and entitlements they deserve.

c) Any form of worker voice in their individual and collective interest needs to be protected from unwarranted employer reprisal in a timely and secure process. If an employer is found in breach of labour law, the Ministry should provide the employee with any remedies and collect directly from the employer (e.g. child support under family law).

d) The default employment relationship should be reversed when classifying a person as self-employed vs an employee. Rather than an employee challenging their classification, employers must demonstrate a job is not an “employee” to the Ministry of Labour before being classified as self-employed (e.g. a company must demonstrate that hiring a temporary foreign worker is justifiable against the domestic labour market supply).

e) The ESA should ensure that people doing the same work are treated similarly re pay, benefits and working conditions in a company (potentially pro-rated based on size of company). ESA should cover anyone who is paid to perform work in the production of goods and services on an on-going basis regardless if they work directly or indirectly for a firm. To the extent a company has outsourced some functions of production; they need to carry some liability for the labour practices of outsourced firms.

f) Age, commission, services that historically include tips, piece work, etc should not be exempt from providing a basic wage and benefit floor.

g) All employees should be able to have a minimum leave (potentially pro-rated to size of company) for unanticipated health and family emergencies without loss of income and tenure. If this creates a hardship for small companies, the province could administer a payroll employer/employee deduction (e.g. EI) that covers sick/emergency days.

h) CAGSI in the above points has chosen to focus on those who are not represented by unions and associations who are able to organize within a firm or sector to have a stronger voice in decisions that affect working conditions and security. As a group we do not have the personal experience to comment on existing and newer forms of collective bargaining and organizing but feel strongly that there is an important role for the government to ensure that economic power cannot be used to undermine democratic principles of free association and representation. As vulnerable workers we lament that some unions and associations appear to have abandoned or ignored the plight of other workers in their own self-interest. We also recognize that unions and associations have helped create the foundations for labour relations and working conditions we believe should be the floor for every worker. In lieu of governments being able and/or willing to represent vulnerable workers directly, other mechanisms like unions and associations should be recognized as important instruments in

helping balance extreme differentials in the economic power between workers and employers.

Thank you for your consideration of the views and ideas we have submitted. We would be happy to clarify or expand on any of suggestions we have included.

Yours,

A handwritten signature in cursive script that reads "Rick Eagan".

West Neighbourhood House Staff to CAGSI  
On behalf of Community Advisory Group on Social Issues  
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## **Theme 1: A Sustainable Supply of Affordable Housing**

- Inclusionary housing and/or zoning is a proven tool in other large urban centres that when applied in hot housing markets, requires private developers as a condition of development or redevelopment to allocate a percentage of units to affordable home ownership. Similar mechanisms could be enforced that place a comparable demand on purpose build rental. Conceivably, social housing providers through social housing programs could purchase affordable units and layer on other subsidies that enable deeper levels of affordability to be realized.
- Social Housing program spending need to be indexed to demand and targeted proportionally to the vacancy rates generally and specifically, waiting lists for subsidized housing in different regions of the province. It's not enough to allow demand to grow if current spending cannot keep up with the current trends. Targets and funding need to be benchmarked against social housing waiting lists with a commitment to reduce the waiting list by a percentage every year (e.g. reducing child poverty by 25 % over 5 yrs). Social and Affordable Housing developments should be fast-tracked and given priority through development processes.
- Social Housing programs should prioritize investments and strategies that retain land and assets in the public or non-profit domain as a key principle contributing to sustainability. In the short to medium term, because of the depth of the problem, tools such as the low-income housing benefit (as proposed by Daily Bread Food Bank), or an expanded rent supplement program will need to be considered in order to contain and reverse the current crisis until new social housing investments and/or regulatory obligations have come into effect and have a demonstrated impact on reversing the trend.
- All surplus or underutilized public lands should be designated as sites for an "affordable housing development" unless there are significant social or environmental factors precluding such a development. As stated, a private housing development should have affordable housing requirements attached to their development through covenants or regulation. All public land development for the purposes of other government services not maximizing the zoning provisions should also explore the feasibility of attaching affordable housing to the redevelopment.

## **Theme 2: A Fair System of Housing Assistance**

It is hard to conceive of how to thoughtfully respond to these questions given the pressures on emergency and support systems to contain the legacy of the growing inadequacy of affordable housing, cuts to social programs, and the resulting health effects that correlate to prolonged

poverty and homelessness. Additionally, too many young adults and newcomers have arrived at a Hobbesian future as their experience and hopes of establishing homes and careers seem insurmountable. It seems impossible without a new and significant number of affordable housing emerging imminently, an improved or enhanced system will be swallowed by deeper and more complex needs for people who are currently in dire straits combined with the ever emerging new demand on support services as waiting lists continue to grow.

The long term solution is to decrease the demand on these services for people who only need support because of a lack of affordable housing or income inadequacy and/or the result of a prolonged period of homelessness and/or poverty and complications resulting from those conditions. If the demand on emergency services and supports were contained, then many of the existing services would have the capacity to organize and respond to a harder to serve population in a more integrated, intensive and holistic way.

In the short-term, support services need additional resources that target the creation of peer workers that leverage the knowledge and experience drawn from lived experience. This approach both helps preserve and restore the skills, confidence and material capacity of peers to be less personally reliant on social services, it builds extra capacity within the existing system to build community and peer support networks that enable the community to be more directly involved in creating and implementing solutions based on collective actions rather than institutional and professionalized supports that should be more targeted to clinical and prevention programs rather than contain larger socio-economic factors. Further, this approach helps embed an attachment to civic life which could be strengthened in the public and non-profit organizations governance models that have direct impacts on their lives. Social Housing and service providers should strive to create greater transparency, accountability and opportunities in organizational processes that contributes to greater control and engagement in tenant and member lives.

Another legacy issue is the intersection of histories of discrimination and abuse that equity seeking groups have experienced accessing, maintaining and preserving the reasonable enjoyment of safe housing. Dedicated allocations of social program spending should target populations that have faced multiple barriers to affordable and stable housing.

### **Theme 3: Co-ordinated, Accessible Support Services and Theme 4: Evidence and Best Practices**

These themes have existed formally and informally in relevant sector for years. The successes to date in these areas have been constrained by the lack of sufficient dedicated resources or capacity to allocate resources while contending with the general context of austerity and the housing crisis.



We all know of social housing providers and supports that we feel are better than others. We cannot tell what factors attribute to the differences in impact as that information is generally not available or not publically available. Popular theories in discussions amongst low income tenants attribute the differences to individual worker performance, personalities and attitudes which sometimes seem to dominate organizational culture. Individual and organizational performance does not account for a broader trend that's emerging that appears as the system itself is emulating a survival mode that many residents and tenants find themselves in. In the private sector the low income community just assumes that current policies and regulations in the private market are a result of political and economic power that governments are unwilling to confront. They also recognize that higher rents and mortgages buy you better housing. A bigger investment in a private development has a higher return on investment (profit). A bigger investment in social housing would similarly buy a bigger social return in investment at a systems level.

The consultation questions that allude to doing more with less seem to presume that there is still significant waste, inefficiencies and duplication in the system that can be redirected towards system improvements, reform and innovation. There is always room for improvement but two decades of trying to do more with less, working smarter not harder, collaboration, integration, and mergers suggest that the incremental gains from yet another exercise in efficiency will not make any significant difference. From a CAGSI perspective the critical question is what more could we do with more investment in the areas identified. Understanding best practices, understanding disaggregated data on priority populations, understanding what outcomes we should be tracking are all important data that would help us all align our work towards a shared strategy driven by new opportunity. Redirecting resources to advancing systems coordination and evaluation is not the answer. Priority should go to stabilizing the system through direct investment in new affordable housing and then new practices and measures can explore how to improve and strengthen. There are already shelves of existing reports and evaluations at local and systems levels, collaborations, networks and partnerships waiting for the constellation of conditions that only government can facilitate. We need provincial leadership that can move us to getting more shovels in the ground and securing and renewing the existing stock.

On a final note, it is moral imperative to expand emergency supports and services that are filling the gap of inadequate affordable housing supply and the social problems resulting from homelessness and prolonged and deep poverty. Emergency services are an inefficient and ineffective response to a lack of affordable housing and its consequences. It is far more effective in the long term to invest in affordable housing. The monthly cost of a housing people in shelters and drop-ins is more than twice the cost of a social housing subsidy or rent supplement. In the short-term until affordable housing is on stream we must be funding both. It is similarly morally irresponsible to not address the affordable housing crisis as a social deficit legacy we pass on to subsequent generations. Again, provincial leadership to directly confront our current fiscal and social deficits requires political will and risk. From the perspective of low-income people, the province is being called into action now even though returns on provincial

investments will only be realized beyond this election cycle. It is not enough to facilitate a consensus amongst the various stakeholders and the electorate on what to do. In this matter the province must lead and bring the public on-side.

Thank you for your consideration of the views and ideas we have submitted. We would be happy to clarify or expand on any of suggestions we have included.

Yours,

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