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October 12, 2016

Mr. Mitchell and Honourable Murray
Special Advisors
Changing Workplaces Review
ELCPB 400 University Ave., 12th Floor
Toronto, Ontario M7A 1T7

Dear Mr. Mitchell and Hon. Murray:

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

The Caregivers' Action Centre (CAC) is an organization of current and former workers under Canada's Caregiver Program (CP).¹ More than half of all caregivers admitted to Canada under the Temporary Foreign Worker Program (TFWP) each year work in Ontario, and more than half of these caregivers work in Toronto. Over the past 10 years we have worked with thousands of caregivers in the Greater Toronto Area to improve the lives and conditions of caregivers in Ontario.

Workers under the Caregiver Program are critical to Ontario's economy. We help families meet many of the most basic physical, emotional, and social needs of the young and old. We provide care for the elderly and people with disabilities. Care work is the work that makes all other work possible. Caregivers free the time of countless other workers, allowing them to engage in the widest range of socially and economically productive pursuits. Yet it is also work that is often substandard, behind closed doors, and out of reach of basic workplace protections.

The Changing Workplaces Review provides an unprecedented opportunity to tackle the root causes of precarious work. 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. We were happy to see that one of those gaps identified is the exclusion of caregivers (domestic workers) from the *Labour Relations Act* and recognition that new models of collective bargaining are necessary to enable caregivers to access their constitutional right to freedom of association.

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¹ The Live-in Caregiver Program was replaced by the Caregiver Program in 2014.

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 recommend:

1. That caregivers and other migrant workers get the same rights and protections as other workers in Ontario;
2. That caregivers and migrant workers get specific anti-reprisals protections, just-cause protection and targeted proactive ESA enforcement.
3. That the *Labour Relations Act* should be expanded to provide real access to collective organizing, bargaining and representation for caregivers and migrant workers.
4. That caregivers and migrant workers are protected from recruitment fees through proactive licensing and regulation of recruiters.

The Migrant Workers Alliance for Change has developed recommendations to further migrant worker rights - [**Ensuring Migrant Worker Fairness**](#) – and the Caregivers' Action Centre endorses those recommendations. 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 also supports and endorses their submission, [**Building Decent Jobs from the Ground Up**](#).

Please do not hesitate to contact the Caregivers' Action Centre if you have any questions.

Yours truly,

Anna Malla
Coordinator
Caregivers' Action Centre

