



**RNAO's Response to *Bill 148:*  
*Fair Workplaces, Better Jobs Act, 2017***

Submission to Standing Committee on Finance  
and Economic Affairs

July 21, 2017



## **Introduction**

The Registered Nurses' Association of Ontario (RNAO) is the professional association representing registered nurses (RN), nurse practitioners (NP), and nursing students in all roles and sectors across Ontario. Since 1925, RNAO has advocated for healthy public policy, promoted excellence in nursing practice, increased nurses' contributions to shaping the health system, and influenced decisions that affect nurses and the public they serve.

RNAO appreciates the opportunity to provide feedback to the Standing Committee on Finance and Economic Affairs on Bill 148, *An Act to amend the Employment Standards Act, 2000 and the Labor Relations Act, 1995 and to make related amendments to other Acts or the Fair Workplaces, Better Jobs Act, 2017*. As nurses, we see firsthand the devastating consequences of job insecurity and its negative impact on people's health and wellbeing.

### **Fair Workplaces, Better Jobs = A Healthier Ontario**

The government of Ontario is to be commended for initiating the Changing Workplaces Review (CWR) as a means to "improve security and opportunity for those made vulnerable by the structural economic pressures and changes being experienced by Ontarians."<sup>1</sup> The CWR terms of reference assert that "Ontario is committed to an economy that benefits all Ontarians, because the economy is not an end in itself--but a means to enhancing opportunity and security for all."<sup>2</sup>

Those who are currently left out of "an economy that benefits all Ontarians," and the possibility of economic security, include those who are trapped in precarious employment. The CWR defined this as "work for remuneration characterized by uncertainty, low income, and limited social benefits and statutory entitlements."<sup>3</sup> Indeed, the changing nature of work in the 21st century with its growing precariousness has been well documented in the academic literature<sup>4 5 6</sup> and in CWR reports.<sup>7</sup>

Like with climate change deniers, labour market stakeholders also have deniers of their own, and sadly despite the evidence to the contrary, the Ontario Chamber of Commerce and the Keep Ontario Working Coalition argue that the "issue of precariousness in our society has been overstated."<sup>8</sup> RNAO joins the CWR Special Advisors, C. Michael Mitchell and John C. Murray, who disagreed and clearly quantify the scope of the problem. Their final report estimated that the proportion of vulnerable workers in precarious work in Ontario in 2014 was between 30-32 per cent (which translates to 2,097,000 of the 6,571,000 workers in the province at 31.9 per cent).<sup>9</sup>

Much has been said that the circumstances in which people are born, grow, live, work, and age<sup>10</sup> determine their health. In Canada, why some people are healthy and others

are not is linked to dis/ability; early childhood development; education; employment and working conditions; food insecurity; health services; gender; housing; income and income distribution; Indigenous status; racialized status; social exclusion; social safety net; and unemployment and job security.<sup>11</sup> And, as stated in the *Changing Workplaces Review* final report, in Ontario, the risk of being in a precarious job is not equal: workers with less than a high school diploma, single parents with children under 25 years, recent immigrants, women, and people who are racialized, are overrepresented among vulnerable workers.<sup>12</sup> Even when controlled for age and education, the data show that second-generation racialized women earn only 56.5 cents per dollar of what non-racialized men earn, while racialized men earn 75.6 cents for every dollar earned by non-racialized men.<sup>13</sup> This "colour coded labour market" results in the racialization of poverty, where poverty rates for racialized families are three times higher than for non-racialized families.<sup>14</sup> This is not only an individual and family tragedy but it fractures community well-being as income polarization grows and neighbourhoods are increasingly segregated, as has been documented in Toronto since 1970.<sup>15 16</sup>

The global evidence<sup>17 18</sup> is conclusive that improving health and decreasing health inequities requires collective action to improve conditions of daily life. Furthermore, collective action is also needed to "tackle the inequitable distribution of power, money and resources--the structural drivers of those conditions of daily life."<sup>19</sup> This is why RNAO applauds the proposed amendments to the *Employment Standards Act* and the *Labour Relations Act* as they have the potential to improve the social determinants of health in Ontario and influence structural drivers that help determine distribution of power, money, and resources.

The CWR final report affirms the central importance of work by quoting former Chief Justice of the Supreme Court, Brian Dickson:

Work is one of the most fundamental aspects in a person's life, providing the individual with a means of financial support and, as importantly, a contributory role in society. A person's employment is an essential component of his or her sense of identity, self-worth and emotional well-being. Accordingly the conditions in which a person works are highly significant in shaping the whole compendium of psychological, emotional and physical elements of a person's dignity and self-respect.<sup>20</sup>

RNAO commends the CWR report for explicitly recognizing the "inherent power imbalance and inequality of bargaining power between employer and employee" that "manifests itself in almost every aspect of the employment relationship, particularly in a non-union environment."<sup>21</sup> The CWR advisors aptly acknowledge that legislation is a critical "countervailing force to the power imbalance in the employment relationship."<sup>22</sup>

Fair wages and decent work are essential for the health of individuals, families, communities, and our province. Decent work and wages advance Ontario's "vision of a province where every person has the opportunity to achieve his or her full potential"<sup>23</sup> as envisioned by the *Poverty Reduction Act*, unanimously passed by all parties in May 6, 2009. As RNAO previously testified in our CWR submissions,<sup>24 25</sup> decent work with fair wages is an important issue to our members in their multi-faceted lives as health professionals, family members, workers, employers, neighbours, and citizens.

In 2012, Canada<sup>26</sup> and other member states of the United Nations endorsed the Rio Declaration on Social Determinants of Health<sup>27</sup> to address health inequities by improving working and living conditions that affect health and well-being. One of the ways that the international community is operationalizing this commitment is through a Health In All Policies approach. This is "an approach to public policies across sectors that systematically takes into account the health implications of decisions, seeks synergies, and avoids harmful health impacts in order to improve population health and health equity."<sup>28</sup>

At RNAO's 2017 Annual General Meeting a resolution was passed advocating for "a Health in All Policies approach to be implemented within Ontario to promote population health and ameliorate growing health inequalities." RNAO urges the province of Ontario to use a Health in All Policies approach toward Bill 148 so that preferential weight is given to the objective of improving population health outcomes and decreasing health inequities by strengthening labour legislation. A focus solely on one or two factors, such as potential threat to economic growth and higher costs for employers, is no longer adequate, nor acceptable. This is especially true as economic growth could be stimulated by increasing the minimum wage<sup>29</sup> and investing in employees has been showed to benefit employers with increased productivity and reduced turnover.<sup>30 31</sup>

Transformative changes in the nature of work require a bold legislative response. It is imperative to act now with the recommended legislative changes in Bill 148, as the health and well-being of those struggling to survive is being compromised every day that precarious employment continues to grow in our province.<sup>32 33 34</sup> Furthermore, it is unjust that those who disproportionately bear the burden of living in poverty due to low-wage, precarious employment are female, racialized, Indigenous, recent immigrants, and/or dis/abled.

As RNAO states in our May 31, 2017 media release, we applaud the province's announcement of raising the minimum wage to \$15 per hour and other progressive changes that will protect workers, including equal pay for equal work and increased enforcement of labour laws.<sup>35</sup> Bill 148 is consistent with efforts to address decent work

deficits in non-standard employment across the globe through the implementation of policy initiatives that plug regulatory gaps and strengthen collective bargaining.<sup>36</sup>

**RNAO has the following recommendations to further strengthen Bill 148:**

**Section 23.1 *Employment Standards Act (ESA) Minimum Wage***

RNAO supports, in the strongest possible way, Bill 148's amendment to increase the general minimum wage to \$14 per hour on January 1, 2018 and to \$15 per hour on January 1, 2019 with annual inflation adjustment on October 1 of every year.

Furthermore, RNAO urges you to:

**Remove the proposed amendment of sub-minimum wages for students and liquor servers.**

*Rationale:* Increasing the minimum wage to \$15 per hour wage with greater attentiveness to ensuring that fair legislation and enforcement of labour standards would strengthen the possibility of good jobs and serve as a pathway out of poverty. Other jurisdictions that have announced regulatory increases to a \$15 per hour minimum wage include Alberta,<sup>37</sup> New York City,<sup>38</sup> Los Angeles County,<sup>39</sup> and California.<sup>40</sup> The minimum wage must apply equally without exemptions by age or sector. Ontario is the only province/territory that permits employers to pay a lower minimum wage to young workers.<sup>41</sup> The vast majority of jurisdictions in Canada (except for British Columbia, Ontario, and Quebec) do not allow a lower wage for those who serve liquor.<sup>42</sup>

**Section 50 *Employment Standards Act (ESA). Personal Emergency Leave***

RNAO fully supports the amendment to extend Personal Emergency Leave (PEL) to all workers, not only employees of employers who regularly employ 50 or more employees. Furthermore, RNAO urges you to:

**Amend subsections 50 (5) of the ESA to read:**

**(5) An employee is entitled to take a total of seven days of paid leave and three days of unpaid leave under this section in each calendar year.**

*Rationale:* As Ontario is the only jurisdiction to have an employee-size (50+) eligibility threshold for PEL, RNAO fully supports bringing the province in line with other jurisdictions to ensure basic fairness for employees.<sup>43</sup> Currently, PEL is unpaid, job-protected leave that can be used by employees for their own personal illness, injury, and medical emergency or for the death, illness, injury, medical urgency or urgent matter concerning specified family members.

RNAO urges that the number of paid PEL be increased from two to seven days. This would support the health of individual workers and their families<sup>44 45</sup> and help them cope with bereavement and other urgent family matters.

RNAO encourages the Standing Committee on Finance and Economic Affairs to be particularly attentive to testimony of those with lived experience of being marginalized and their advocates.<sup>46 47 48</sup> Amidst predictions of catastrophe at the prospect of updating archaic labour laws,<sup>49 50</sup> it is imperative to listen to those who can speak to the incredible human, social, and economic toll that the current legislative regime is exacting. Those who are marginalized do not have the same resources to speak as loudly as commerce but their concerns must be equally and fully considered. RNAO also urges that any unintended consequences of this legislation be swiftly addressed. For example, there is a need to ensure that injured workers not have their Workplace Safety and Insurance Board (WSIB) benefits reduced when the minimum wage goes up.<sup>51</sup>

## **Conclusion**

In their introduction to the final report of the Changing Workplaces Review, the special advisors wrote:

A society where decent labour standards are observed and respected in the vast majority of workplaces, and where rights to meaningful collective bargaining are acknowledged and not undermined, would ideally result in an economy based on a sound and ethical foundation and workplaces that are productive and fair. Overall, our society would be a better place and we would all benefit.<sup>52</sup>

RNAO believes that Ontario can be that healthier and better place with the passing of a strengthened and strongly enforced *Fair Workplaces, Better Jobs Act, 2017*. Please know that nurses are unwavering in our commitment to achieve this goal.

Thank you to the Standing Committee on Finance and Economic Affairs for considering our comments and recommendations.

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