Bill 148, Fair Workplaces, Better Jobs Act

Unifor Submission to the Standing Committee of Finance and Economic Affairs

July, 2017

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1. Introduction: Response to Bill 148, *Fair Workplaces, Better Jobs Act*

On behalf of the more than 160,000 Ontario members, Unifor welcomes the opportunity to submit our views to the Standing Committee of Finance and Economic Affairs concerning Bill 148, the *Fair Workplaces, Better Jobs Act*.

Our union commends the government for its leadership in taking important steps to address the gross inequity that characterizes so much of today's labour market. We do not accept that income inequality and a dramatic rise in insecure work is inevitable and irresistible, and that society must simply resign itself to a grim reality of precarity and inequality. Workers in Ontario have long endured woefully out of date employment laws.

Unifor, along with other labour organizations, advocacy, faith, anti-poverty and student groups and others were deeply engaged in the Changing Workplace Review. The review process was a milestone and must also be commended; it was the first independent review of the *ESA* and *LRA* in a more than a generation. It was the first integrated review of the law of work in unionized and non-unionized workplaces, and the first review of labour law in the context of recent Supreme Court decisions on the constitutional rights of workers.

The timely introduction of the *Fair Workplaces, Better Jobs Act* clearly reflected the important work of the Changing Workplaces Review, and demonstrated that the government heard the concerns of Ontario's most vulnerable workers and is committed to taking action. The changes introduced in Bill 148 will greatly help millions of workers and their families who are struggling with precarious, insecure work, and will serve as a bold first step to modernize Ontario's employment laws. There is a growing consensus among Ontarians that improving labour laws is an essential ingredient for a fair society and successful economy. We urge the government to adopt some meaningful improvements to the legislation to fully achieve fairness.

Unifor joins with the Ontario Federation of Labour in bringing forward important amendments to improve Bill 148. Along with other affiliated unions, Unifor worked to carefully review the proposed legislation and develop the Ontario Federation of Labour's comprehensive amendments to both the *ESA* and *LRA*. Reflecting the composition of our membership, and priority issues for our union, the following submission focuses on issues and examples of specific relevance and importance to Unifor, including:

- Extending card-based certification to all sectors: the example of retail
- Extending successorship rights to all contracted services: the example of school bus services
- Extending broader based collective bargaining structures
- Establishing a designated paid leave for survivors of domestic and/or sexual violence
- Protecting injured workers from unintended consequences of higher minimum wages

We are calling on the government to deepen its commitment to the people of Ontario by improving the *Fair Workplace, Better Jobs Act* so that it truly raises the floor for all Ontario workers and creates lasting conditions for decent work. Let this be an important moment in Ontario's history.

2. Extending card-based certification to all sectors: the example of retail

Unifor regrets that Bill 148 will not restore card-based certification processes except in a small number of sectors in which the government has identified precarious employment as an issue. New section 15.3 would permit a card-based application to be filed for employees of a temporary help agency, a building services provider or a home care and community services employer. The rationale is that in these industries, employees do not work together in a single workplace and so are difficult to organize. It may also be impractical for the OLRB to conduct a vote.

The Bill 148 measures are consistent with the advice of the CWR advisors. They recommended the continuation of the current vote-based system on the basis that it is now well-established in Ontario, reflects democratic norms, and produces credible results. They did this however only on the condition that other changes are made to ensure a balance between unions and employers, including access to employee lists, and greater access to remedial certification and first contract arbitration[1].

The fact that the CWR special advisors placed conditions on the retention of the current vote-based system suggests that, all other considerations aside, a vote-based system unduly favours employers. While the measures that the CWR special advisors sought as conditions for retaining vote-based certification have been included in Bill 148, Unifor remains rightly concerned about the preservation of a system that necessarily favours employers (who have an opportunity to actively participate in a union opposition campaign) when compared to a system in which employees may more easily make a majority decision about unionization without employer interference.

Unifor believes that the rationale underlying the extension of a card-based option for certification applications in some sectors supports an extension of that option to applications in all sectors. Our recommendation below therefore would make a card-based application optional in all cases.

A fundamental element in the collective bargaining process is the mechanism by which workers can express their interest to freely associate with others for the meaningful pursuit of collective workplace goals – in other words, the manner in which a union is certified. Bill 148 proposes to extend card based certification for the temp agency industry, the building services sector, as well as the home care and community services industry. If passed, only four sectors (including the male-dominated construction industry) will permit workers to unionize through card-based certification in the province.

It is imperative that the LRA facilitate access as well as remove barriers to unionization – not for some, but for all workers. Given that women, racialized workers, youth, and newcomers represent a significant proportion of the Ontario workforce, the proposal to restrict card-based certification to certain extremely limited sectors significantly impedes their ability to join a union. This is a particular concern in Ontario's retail sector.

As highlighted in Unifor's submission[2] to the Changing Workplaces Review, the empirical evidence demonstrates that the current procedure of mandatory voting in Ontario allows employers to exert undue influence on workers, and thereby successfully deter organizing activity. In order to correct this imbalance of power, Ontario ought to implement a union certification model that facilitates the acquisition and maintenance of bargaining rights, rather than retaining for most workers a system designed by openly anti-union predecessor government to persist in creating artificial barriers for workers to access and exercise their collective rights.

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[1] Changing Workplaces Review Final Report, p. 323.

[2] Unifor, *Building Balance, Fairness, and Opportunity in Ontario's Labour Market, Submission to the Ontario Changing Workplaces Consultation* (September 2015) at pp 54-62,

The retail and wholesale sector serves as a powerful example of the need to extend card-based certification to all sectors. Unifor has more than 17,000 members working in that sector. With a rate of unionization less than half the private sector average – just one in ten workers are covered by a collective agreement – Unifor has first-hand experience with the barriers to unionization faced by Ontario workers. If a goal of Bill 148 is to address precarious work, then meaningful changes that improve access to unionization for retail workers are essential.

The retail and wholesale industry is a hugely significant part of Canadian economic activity. One-in-seven Ontario workers — 1 million people — are employed in this industry. The sector generates a staggering $1.2 trillion in annual sales and adds $190 billion to Canada's annual economic output. It is a large and rapidly growing segment of the economy, which is why it is so concerning that this sector, perhaps more than any other, is synonymous with precarious employment.

Consider that the average wage for retail clerks (both full and part-time) is just shy of $14 per hour. Add to that the extraordinary reliance retailers place on part-time work (in Unifor, 80-90 percent of members in supermarkets work part-time), persistently high rates of turnover (average tenure in retail is 4.5 years), hard-to-secure work hours, unpredictable schedules and low levels of unionization, and there's good reason for concern. If Canadians are increasingly relying on retail jobs to make ends meet, the quality of jobs now on offer doesn't cut it.

The precarious features of work in retail also bring added barriers to organizing and meaningful access to collective bargaining. Given the sheer scale of the industry, unorganized workers in retail represent by far the largest group of workers in the province without access to the benefits of collective bargaining.

Given that the Supreme Court of Canada has recognized that "the function of collective bargaining is not served by a process which undermines employees' rights to choose what is in their interest and how they should pursue those interests"[3], Bill 148 should repeal the mandatory vote system and extend card-based certification to all sectors in Ontario.

Recommendations:

In section 5 of Bill 148, amend proposed section 15.3 of the LRA by striking out subsections (1), (2) and (3).

Amend subsection 15.3 (4) of the LRA by striking out "specified industry".

Amend section 15.3 of the LRA to add the following:

Non-application to construction industry

(25) This section does not apply with respect to an employer as defined in subsection 126(1).

[3] *Mounted Police Association of Ontario* v. *Canada (Attorney General)*, 2015 SCC 1.

3. Extending successorship rights to all contracted services: the example of school bus services

Bill 148 addresses the problem of "contract flipping" only in the context of building services providers. A new section 69.1 would extend successor rights upon the change of a contractor only where employers provide services to a building owner or manager that are related to servicing the premises including building cleaning services, food services and security services. Unifor believes that the same rationale that justifies successor rights for building services providers justifies successor rights in other circumstances. The need for such an extension is perhaps most glaring in the case of school bus drivers.

Unifor has close to 2,000 members working in Ontario's school bus industry, a sector dominated by rotating service contracts and contract flipping. The extension of successorship rights is of urgent importance to our members in this industry.

Currently in Ontario, school bus route contracts are awarded to private companies by provincial transportation 'consortiums' (i.e. organizations comprised of several school boards within a specific geographic area) through a Request-for-Proposal (RFP) process. When a contract expires, a new RFP process is initiated and routes can be awarded to a different company. Unionized drivers must apply to be re-hired by the new company, and in the process, lose their union representation and the bargained wages, benefits, and protections in their previous collective agreement. This process has caused great instability within the school bus transportation industry – an industry that is already characterized by low wages, unstable hours, poor safety standards, and a lack of job security.

The current RFP process can be directly tied to the driver shortage experienced in Toronto in September of 2016, which resulted in 2,600 students without a means of getting to school, and the loss of 140 unionized school bus jobs in Ottawa in March of 2015, when the company First Student lost its route contract. Unionized school bus services are certified under provincial or federal labour laws depending on whether the business has any inter-provincial or international aspects. Extending successorship rights to the school bus transportation industry would create greater stability for drivers and students, promote driver retention, improve working conditions, and minimize the overall highly-precarious nature of driver work.

Bill 148 proposes to extend successorship rights only to the building services industry does no more for other employees than to allow for regulations to potentially extend successor rights to publicly funded services – although exemptions can be made through regulations. It should not matter whether workers are employed in a publicly or privately funded contracted service – all workers deserve protections against contract flipping. Bill 148 should extend successorship rights to all contracted services.

Recommendations:

In section 7 Schedule 2 of Bill 148, amend subsection 69.1 (1) of the LRA to reflect the following:

Successor rights, contracted services

69.1 (1) This section applies with respect to services provided directly or indirectly by or to a building owner or manager or occupant, or by or to an enterprise owner or manager or occupant, that are related to providing services at or to the premises, occupant or enterprise, including cleaning or housekeeping services, food services, security services and homemaking or personal support services, and any other kind of contracted services.

Repeal subsection 69.1 (2) of the LRA.

Amend clause 69.1 (3) (a) of the LRA by adding "or, in the case of homemaking services or personal support services, at premises where the employees regularly provide the services" at the end of the clause.

Amend clause 69.1 (3) (c) of the LRA to reflect the following:

(c) if substantially similar services are subsequently provided, whether at the same or different premises, under the direction of another employer.

Repeal section 69.2 of the LRA.

Repeal subsection 13 (3) of the Bill.

4. Extending broader based collective bargaining structures

Unifor's contribution to the CWR process included extensive submissions about forms of broader-based bargaining.[4] We proposed novel forms of employee and trade union participation. We proposed that sectoral councils comprised of employers, unrepresented employees and trade unions should have a role in developing sector-specific labour standards tailored to the economic realities of different sectors. Unifor also proposed measures that would assist employees in precarious employment in franchised and similar businesses by permitting and encouraging broader-based bargaining units. We said this[5]:

> e) While sectoral standards should reflect a broad community of interest between all workers, unionized and non-union, the institutions of collective bargaining must also adapt to the growing fragmentation of labour markets through the specific application of multi-employer certifications and bargaining rights. These include measures to enable organization and collective bargaining by workers in franchise operations, as well as within the growing workforce of self-employed and single dependent contractors.

Unifor recognized that its proposals were bold and innovative. Although those bold proposals have not yet been adopted by the government, Bill 148 does adopt some of the measures that the CWR special advisors saw as desirable for implementing broader-based bargain structures. However one key aspect of their recommendations affecting employees of franchised businesses is missing. This presents an opportunity for Bill 148 to be improved in a way that would be of enormous assistance to employees of franchised businesses.

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[4] Unifor, *Building Balance, Fairness, and Opportunity in Ontario's Labour Market, Submission to the Ontario Changing Workplaces Consultation* (September 2015) at pp 54-62, at pp. 104-105

[5] *Ibid.*

Broader-based bargaining structures by consolidating and restructuring bargaining units

Bill 148 would add two separate new processes about the combination of bargaining units.

The new section 15.1 is about consolidating a new bargaining unit with one or more existing bargaining units if they are all represented by the same union at the same or different locations. As discussed by the CWR advisors, the purpose of this kind of provision is to assist in the development of collective bargaining in industries or sectors where it has been difficult to establish it, where an employer carries on business at more than one location or where there otherwise would be multiple small bargaining units at a location[6].

This consolidation process would enable unions to combine small or less viable bargaining units to improve their overall bargaining strength and in some cases would avoid difficult first agreement negotiations with a weak newly-established bargaining unit because the Board would be able to order that an existing collective agreement applies to the new bargaining unit.

Separate from this consolidation power, a new section 15.2 is about restructuring existing bargaining units that are represented by one or more trade unions because the existing bargaining unit structure is no longer appropriate for collective bargaining. This is a process similar to bargaining unit reviews under section 18.1 of the *Canada Labour Code.* The Board will have wide powers under section 15.2 to determine issues including which trade union will be the bargaining agent for a restructured bargaining unit or units. This restructuring provision potentially sets up opportunities for contests between unions about representation of employees of bargaining units after a bargaining unit restructuring. For reasons articulated by the Ontario Federation of Labour, Unifor supports this process if limited to bargaining units that are all represented by the same trade union.

These powers to consolidate and restructure bargaining units potentially will be very useful for ensuring that bargaining structures are and remain effective for collective bargaining but they do nothing for the great many employees in precarious industries who work for franchised businesses.

The special case of franchised businesses

The CWR advisors[7] adopted some aspects of Unifor's submission about franchised businesses by recommending a somewhat complex model of broader-based bargaining for franchised businesses featuring, among other things, a requirement that the franchisees whose employees are represented by a union would be required to set up an employer bargaining agency. The advisors recommended that as part of that model, franchisees with the same owners might be consolidated into a single bargaining unit which would then bargain together.

Section 15.1 does not address the special circumstances of franchised businesses at all. The fact that in many cases, franchisees will all have separate owners will mean that the section 15.1 process is unavailable. In order to advance a modest form of broader-based bargaining in franchised businesses, we propose an amendment to the new section 15.1 to empower the Board to consolidate bargaining units of employees of several franchisees of a single franchisor, even if the ownership of each of them is different, by deeming all of them to be the same employer. This would permit for example, a consolidation of several franchised fast-food restaurant bargaining units into a single bargaining unit

[6] CWR Final Report at p. 351
[7] CWR Final Report at p. 357-361.

that would be able to bargain effectively. This is the same proposal made by the Ontario Federation of Labour. We therefore make the following recommendation:

Recommendation:

In section 5 of Schedule 2 of the Bill, amend section 15.1 of the LRA to add the following:

Franchisees

(8) For the purposes of this section, franchisees of a franchisor shall be deemed to be the same employer.

5. Establishing a designated paid leave for survivors of domestic and/or sexual violence

Unifor has been a leader in putting in place practical supports for women in abusive relationships. We bargained our first set of workplace Women's Advocates in 1993. We now have over 350 Women's Advocates across the country in all sectors of the economy. These specially-trained Advocates assist women in finding community resources as well as assist in safety planning and risk assessment in the workplace.

Unifor has also negotiated paid domestic violence leave in many of our collective agreements, allowing employees to access paid time off to deal with essential issues. Our union has passed a number or resolutions supporting putting domestic violence leave into employment standards protection for all workers. Most recently, a resolution on *Paid Leave for Victims of Domestic Violence* was passed unanimously at our 2016 Unifor Convention.

To advance these issues in our bargaining and legislatively, Unifor has recently published materials for Local Union committees and activists, including: *Bargaining a Domestic Violence Policy & Program*[8], and a *Lobbying Guide: Workers* Facing Domestic Violence, *Economic Supports Including Paid Domestic Violence Leave*.[9]

Domestic Violence in Canada

In 2011, the five most common violent offences committed against women were common assault (49%), uttering threats (13%), serious assault (10%), sexual assault (7%) and criminal harassment (7%). Women were 11 times more likely than men to be a victim of sexual offences and three times as likely to be the victim of criminal harassment (stalking) (Statistics Canada, 2013).

Overall, men were responsible for 83% of police-reported violence committed against women. Most commonly, the accused was the woman's intimate partner(Statistics Canada, 2013). Statistics show that Aboriginal women, women with disabilities and young women are at high risk of intimate partner violence (Statistics Canada 2013).

Although men can be victims of intimate partner violence, women are more likely to be physically injured, fear for their life or be murdered (Statistics Canada 2013). Approximately every six days, a woman in Canada is killed by her intimate partner (Homicide in Canada, Statistics Canada, 2014).

[8] http://www.unifor.org/sites/default/files/attachments/bdvpp_v.1.pdf

[9] http://www.unifor.org/sites/default/files/attachments/final_lobbying_guide_to_domestic_violence_version_wo_crops.pdf

Domestic violence and the workplace

Domestic violence affects the workplace through losses in output, absences, and productivity. A Government of Canada study estimated the economic impact of domestic violence to be $7.4 billion.[10] Issues of domestic violence can also increase risk for physical and psychological violence in the workplace.

Employers know that domestic violence is a workplace issue but often report they don't know how to handle it. According to the Conference Board of Canada, 71 percent of employers reported experiencing a situation where it was necessary to protect a victim of domestic abuse.[11] These findings are consistent with results from Western University's pan-Canadian survey which found that one third of employees had experienced domestic violence at some point in their life.[12]

Of those who reported experiencing domestic violence, 38% indicated it affected their ability to get to work (including being late, missing work, or both). In total, 8.5% of domestic violence victims indicated they had lost their job because of it.

Over half (53.5%) of those reporting domestic violence experiences indicated that at least one type of abusive act occurred at or near the workplace. 81.9% reported that domestic violence negatively affected their performance. Those experiencing domestic violence are not the only ones affected by it; many (37.1%) reported that their co-workers were also affected. Studies in the US indicate that the single greatest cause of death for women in the workplace is domestic violence[13].

For women that have experienced domestic and sexual violence, stable employment is imperative. The financial security associated with employment provides them with the economic independence needed to leave a destructive relationship. Survivors of domestic and/or sexual violence should not be forced to choose between their safety and their job. It is very important that we have supports in place to ensure women keep their jobs. Income security has been named as a key 'determinant of safety.' A 2013 Report from the Women Abuse Council of Toronto says:

> *Income security: Income security is a key determinant of health and wellbeing for individuals, families and communities. In the context of violence against women, income security may include access to savings, employment, social assistance and child support. Economic security is often the primary factor that influences a woman's decision to leave an abuser and/or to not return to an abusive situation. Women leaving violent relationships struggle to re-establish themselves and their children and face dramatic financial barriers in doing so.*

[10] An Estimation of the Economic Impact of Spousal violence in Canada, 2009. Department of Justice, Government of Canada

[11] Domestic Violence and the Role of the Employer. The Conference Board of Canada. November 2015

[12] Wathen, C.N., MacGreggor, J.C.D., MacQuarrie, B.J. with the Canadian Labour Congress. (2014) Can Work be Safe, When Home Isn't? Initial Findings of a Pan-Canadian Survey on Domestic violence and the Workplace. London, ON: Centre for Research & Education on Violence Against Women and Children

[13] Newman, Elaine, *Preventing Violence and Harassment in the Workplace, A Practical Guide to Ontario's Bill 168 for Employers, Unions and Employees,* Toronto: Lancaster House, 2012, page 26

The importance of paid and unpaid leave for workers who have experienced domestic violence is now recognized in Canada and internationally. However, instead of creating a separate leave for survivors of domestic and/or sexual violence, Bill 148 creates only a new entitlement to personal emergency leave. By requiring these workers to use their personal emergency days, it further shortens their leave entitlement and restricts their ability to use it for other purposes such as illness and bereavement. It is also important to note that Bill 148 currently proposes only two paid days, which is severely inadequate to help address issues associated with leaving an abusive relationship and ensuring their own safety.

Bill 148 should create a designated leave for survivors of domestic and/or sexual violence – namely, ten paid days of job-protected leave, followed by 60 days of job-protected unpaid leave. It must be emphasized that the creation of this leave alone will not be sufficient to help survivors of sexual and domestic violence. It is a first step and many more need to be taken, such as creating greater access to transitional housing, medical services, and counseling.

Recommendation(s):

Amend section 29(1) of Schedule 1 of the Bill by deleting proposed paragraph 50(1)(4) of the ESA.

Strike out section 29(2) of Schedule 1 of the Bill.

Add the following section 50.0.1 of the ESA:

Domestic or sexual violence leave

50.0.1 (1) An employee is entitled to a leave of absence because of sexual or domestic violence, or the threat of sexual or domestic violence, experienced by the employee or an individual described in section 50(2).

Advising employer

(2) An employee who wishes to take leave under this section shall advise his or her employer that he or she will be doing so.

Same

(3) If the employee must begin the leave before advising the employer, the employee shall advise the employer of the leave as soon as possible after beginning.

Limit

(4) An employee is entitled to take a total of 10 days of paid leave and 60 days of unpaid leave under this section in each calendar year.

Leave deemed to be taken in entire days

(5) If an employee takes any part of a day as paid or unpaid leave under this section, the employer may deem the employee to have taken one day of paid or unpaid leave on that day, as applicable, for the purposes of subsection (4).

Paid days first

(6) The 10 paid days must be taken first in a calendar year before any of the unpaid days can be taken under this section.

Domestic or sexual violence leave pay

(7) Subject to subsection (8), if an employee takes a paid day of leave under this section, the employer shall pay the employee,

(a) either,

(i) the wages the employee would have earned had they not taken the leave, or

(ii) if the employee receives performance-related wages, including commissions or a piece work rate, the greater of the employee's hourly rate, if any, and the minimum wage that would have applied to the employee had they not taken the leave; or

(b) if some other manner of calculation is prescribed, the amount determined using that manner of calculation.

Domestic or sexual violence leave on public holiday

(8) If a paid day of leave under this section falls on a public holiday, the employee is not entitled to premium pay for any leave taken under this section.

Evidence

(9) An employer may require an employee who takes a leave under this section to provide evidence reasonable in the circumstances of the employee`s entitlement to leave.

Leave under ss. 49.1, 49.3, 49.4, 49.5, 49.6 and 50

(10) An employee's entitlement to leave under this section is in addition to any entitlement to leave under sections 49.1, 49.3. 49.4, 49.5, 49.6 and 50.

6. Protecting injured workers from unintended consequences of higher minimum wages

Unifor works to strongly advocate on behalf of the rights our injured members, and all injured workers; and we work in collaboration with injured workers' advocates in Ontario[14]. We add our voice to those who are raising concerns about the negative consequences for injured workers associated increasing the minimum wage.

[14] Injured Workers Online has provided significant resource materials on the effects of "deeming" and the consequences of raising the minimum wage http://injuredworkersonline.org/. These issues have also been raised by the *Fight for $15 and Fairness* campaign http://injuredworkersonline.org/wp-content/uploads/2017/04/Fact_sheet_iws_15_Fairness_1.pdf

The demand to raise the minimum wage to $15 per is of central importance to all workers. But there is a dilemma in how injured workers relate to this demand. Because of "deeming" – one of the WSIB's more insidious mechanisms to cut people off benefits – when the minimum wage goes up, injured worker benefits go down.

"Deeming" refers to the practice used by WSIB to decide the compensation that it will pay for loss of earnings as a result of workplace injury or illness. It reduces a permanently injured worker's loss of earning benefits under the pretence that the worker could be employed in an occupation for which they are suited– when the reality is that they do not have a job and, in many cases, are not able to work due to their injuries. This systemically leads to poverty among injured workers.

Instead of looking at what the injured worker is actually able to earn in employment that is both suitable and available, the Board deems most injured workers to have returned to full time gainful employment after their injury. Essentially, the WSIB dreams up a "phantom" job that it claims the worker could get, takes away wages the worker is deemed to be earning, and leaves the injured worker with reduced compensation benefits. Consider the following example:

- A worker is making $20/hour when she has a permanent back injury and can't go back to her old job.

- The WSIB "deems" the worker to be working as a customer service representative, making minimum wage, even though she doesn't actually have that job and in fact isn't able to work at all, according to her doctors.

- The workers' benefits are cut by $11.40 per hour, which is the current minimum wage. She now only gets about $218.00 per week in benefits from the WSIB. The worker has fallen into poverty.

When the minimum wage is increased the extra harmful result is that the WSIB will "deem" people to be earning the higher wage, and cut their benefits even more. So when that same worker is deemed to have a minimum wage customer service job, she will be deemed to be earning $15 per hour instead of $11.40. Her benefits will now be cut by $15 per hour, and her cheque from the WSIB goes down to $127.00 per week.

The result of increasing the minimum wage to $15 per hour in this example is a 42% reduction in WSIB benefits from current levels (from $218 weekly to $127 weekly). That's hardly fair, and certainly not the intention of the Government's efforts to address inadequate minimum wages. Unifor joins with injured workers' advocates in calling for the end of the practice of "deeming." Most immediately, injured workers should be protected from the unintended consequences of reduced benefits because of raising the minimum wage.

Recommendation:

Urgent action to prevent all injured workers from being negatively affected by any increase in the minimum wage, due to "deeming."

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