

Pre-Budget Presentation

to the Ontario Legislature's Standing Committee
on Finance and Economic Affairs

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and the Ontario Minister of Finance

Hon. Rod Phillips

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The Income Security Advocacy Centre

The Income Security Advocacy Centre (ISAC) is a specialty legal clinic funded by Legal Aid Ontario. ISAC's mandate is to advance the rights and interests of low-income Ontarians with respect to income security and employment. We carry out our mandate through test case litigation, policy advocacy, community development and public education.

Founded in 2001, we are governed by a community Board of Directors representative of all regions of Ontario. Our Board includes legal clinic caseworkers and people who identify as low-income, with representation from Indigenous communities, racialized communities, people with disabilities and recipients of income support benefit programs.

Recommendations

Informed by ongoing consultation with our community partners on issues relevant to our mandate, we make the following recommendations for the 2020 budget:

Income Security Programs:

- **Recommendation #1:** Increase social assistance rates to reflect real costs of living, including housing costs based on average market rents, utility costs, the cost of a nutritious food basket, transportation, communication devices including telephone and internet, all personal basic needs, and costs that people with disabilities experience based on their specific needs. Rates should also increase with inflation.
- **Recommendation #2:** Maintain the current definition of a “person with a disability” for the purposes of eligibility for the Ontario Disability Support Program (ODSP). The proposed change to align with federal program definitions would disentitle persons with disabilities in need.
- **Recommendation #3:** Ensure sufficient funding, inter-ministerial collaboration and administrative alignment so that OW and ODSP recipients receive wrap-around services, such as childcare, housing, mental health treatment, addictions treatment, and employment supports necessary to achieve their personal goals.
- **Recommendation #4:** Maintain the independence and appellate functions of the Social Benefits Tribunal in order to ensure that administrative social assistance decisions do not wrongly deny supports that Ontarians need to meet their most basic needs. Invest in improving first-level decision making and in filling Social Benefit Tribunal vacancies.
- **Recommendation #5:** Make the Canada-Ontario Housing Benefit available to social assistance recipients who are tenants, without any clawback of OW or ODSP benefits.

Workers' Rights:

- **Recommendation #6:** Increase the number of inspectors under the *Occupational Health and Safety Act* and the *Employment Standards Act*, in order to ensure safe working conditions and proper pay for Ontario's workers.
- **Recommendation #7:** Immediately increase the minimum wage to \$15 per hour, restore annual indexation to the Consumer Price Index, and implement laws to ensure that workers who do similar work receive equal pay.
- **Recommendation #8:** Reinstate 10 Personal Emergency Leave Days, including seven days as paid leave.

Legal Aid Ontario:

- **Recommendation #9:** Reverse the cuts to Legal Aid Ontario and make significant investments in access to justice for Ontario's workers and social assistance recipients.

A. Investing in Income Security Programs

Ontario's social assistance system is made up of two programs: the Ontario Disability Support Program (ODSP), which provides income support specifically to persons with disabilities and Ontario Works (OW), which supports others who need financial assistance.

Although it is well-documented that these programs are severely under-funded,¹ in last year's budget, the provincial government announced plans to take \$1 billion dollars out of social assistance programs, representing an 11% reduction in spending.² This cut would have catastrophic implications for the well-being of those who rely on social assistance. While concern is sometimes raised about the rising costs of the programs, there has been a significant decline in the share of Ontarians receiving support from social assistance (from 9.4% in 1997 to 6.7% in 2017).³

ISAC recommends that the province invest in poverty-fighting measures and a social assistance program that promotes well-being and dignity for all Ontarians.

1. Increase rates

We note with great concern that the province did not increase social assistance rates in the current fiscal year. As a result, social assistance recipients are falling even further below the poverty line, contributing to the growing homelessness crisis, food insecurity and poor health.

In the absence of an increase, a single person receives only \$733 per month from OW or \$1,169 if they qualify for ODSP.⁴ The cost for safe housing and nutritious food far exceeds these amounts.⁵ As a result of inadequate benefits, people on OW and ODSP live in substandard, dangerous housing and rely on food banks⁶ or other charities. Or they go

without. Raising the rates is the right thing to do because everyone deserves the ability to feed and clothe themselves and live with health and basic human dignity.

Major investments in social assistance in this and subsequent budgets are also good for Ontario's economy. Investments in direct benefits to low-income people have a disproportionately high economic return because low-income people spend their money in their local communities: for every dollar invested, the return for Ontario is \$1.30.⁷ As well, improving incomes for people on OW and ODSP will reduce costs in other areas of government, including health care, the justice system and lost productivity, which currently results in the loss of between \$4 and \$6 billion in income tax revenue.⁸ In addition, child poverty has particularly deep and costly long-term impacts, including greater likelihood of low earnings and poor health in the future.⁹

- **Recommendation #1:** Increase social assistance rates to reflect real costs of living, including housing costs based on average market rents, utility costs, the cost of a nutritious food basket, transportation, communication devices including telephone and internet, all personal basic needs, and costs that people with disabilities experience based on their specific needs. Rates should also increase with inflation.

2. Maintain Ontario's realistic and practical approach to disability benefits

In November 2018, Hon. Lisa MacLeod, former Minister of Children, Community and Social Services announced a plan to change the definition of disability used for ODSP to be more like the one used in federal government benefit programs. However, the federal definition is now under review because it is based on debunked stereotypes that disabilities are continuous, permanent and change very little over time, a description that excludes the majority of persons with disabilities.¹⁰ Ontario's current definition is more realistic and includes people with episodic disabilities such as multiple sclerosis, rheumatoid arthritis, some forms of cancer and mental health issues.¹¹

Hon. Todd Smith, the current Minister of Children, Community and Social Services has recently noted a need for ODSP reform arising from findings of the Auditor General of Ontario's audit of ODSP concerning an increase in the cost of the program.¹² ISAC urges the province not to rely on the Auditor General's report as a basis for changing the definition of disability. The increase in the number of people who rely on ODSP does not reflect a problem with the program. The increase in reliance on ODSP more likely reflects a growing need for ODSP that is driven by the increased number of Ontarians in the 60-64 age group (older population, see *Figure 1*).¹³

It is undisputed that the likelihood of being disabled increases with the ageing process and the Auditor General's report did not examine whether the caseload of ODSP demonstrated an increase among the older population. Apart from ageing, other key factors that could account for the caseload increase include the changing nature of the labour market, an increase in precarious employment and growing levels of working poor, and cuts to other social programs that force people to rely on social assistance.¹⁴

ISAC urges the province to avoid depending the poverty of persons with disabilities. Narrowing the definition would simply move thousands of persons with disabilities, who have higher living costs and disability-related employment barriers, to OW. This would only

increase the OW caseload and would not support positive outcomes for recipients. It would cost the government far more in health care and other costs than it would save in reducing benefits and administration costs.

- **Recommendation #2:** Maintain the current definition of a “person with a disability” for the purposes of eligibility for the Ontario Disability Support Program (ODSP). The proposed change to align with federal program definitions would disentitle persons with disabilities in need.

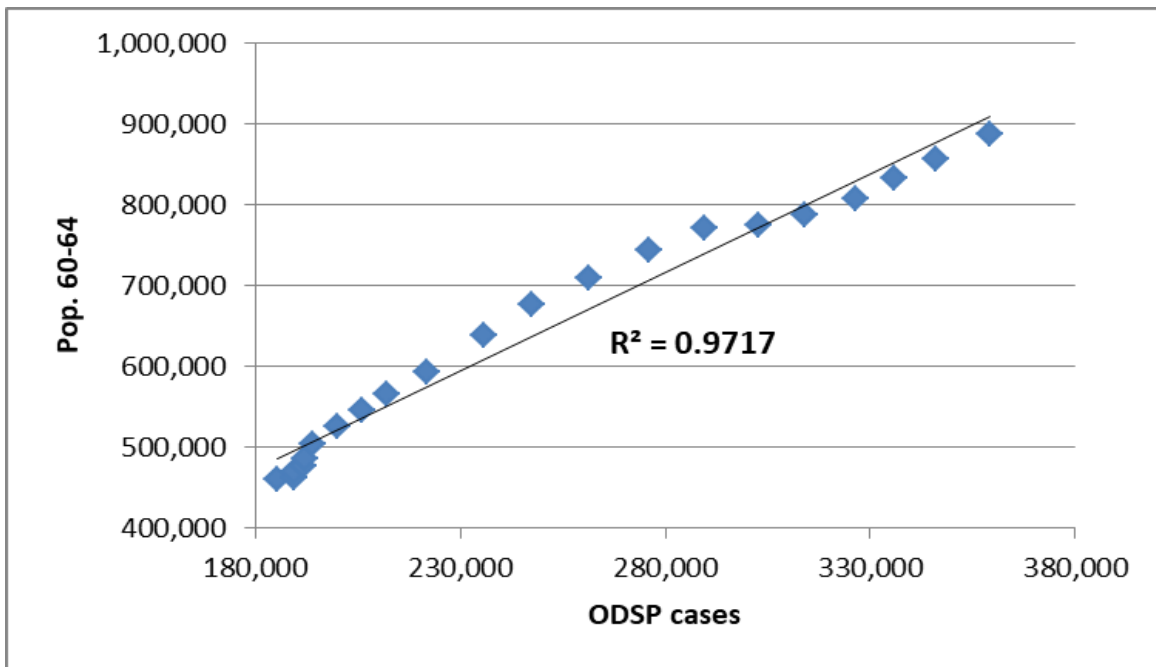


Figure 1: Regression Analysis Showing ODSP Case Increase Tracks Older Population Increase, Courtesy of Michael Mendelson, Maytree Fellow

3. Ensure “wrap-around” and employment services for social assistance recipients are adequately supported and not punitive

Ontario is moving forward with a plan to integrate employment services for social assistance recipients with services available to the general public through Employment Ontario. That model will first be piloted in three communities and funding for service providers will be based on yet unidentified performance outcomes.

ISAC urges that services be adequately funded, non-punitive and take into account the realities of the labour market. For example, a single-minded focus on moving people into any job, in a context where almost a quarter of new jobs in Ontario offer very low pay and little security,¹⁵ may not lead to financial independence but to health risks in unsafe working conditions. Given the realities of the labour market, recipients should not be punished by having their benefits terminated or reduced if they are unable to find or maintain employment.

For those who are not at a point in their life where they can take advantage of employment services, Ontario has previously announced its intention to provide “wrap-around supports to help vulnerable social assistance recipients address barriers and access employment

supports.”¹⁶ Recipients have been calling for such services for many years. Done correctly, the provision of “wrap-around” services – like mental health and addictions supports, childcare, housing and life skills – will provide the supports that people need to respond to traumatic and difficult situations that lead them to apply for social assistance.

- **Recommendation #3:** Ensure sufficient funding, inter-ministerial collaboration and administrative alignment so that OW and ODSP recipients receive wrap-around services, such as childcare, housing, mental health treatment, addictions treatment, and employment supports necessary to achieve their personal goals.

4. Maintain the independence and appeal functions of the Social Benefits Tribunal and fill tribunal vacancies

Social assistance recipients who disagree with decisions about their benefits have the right to appeal to the Social Benefits Tribunal. These appeal rights are essential to make sure that recipients are not improperly denied access to the benefits they need to survive.

The Ministry of Children, Community and Social Services (MCCSS) is in the midst of reviewing the ongoing functions of the tribunal. That review is, in part, a response to the Auditor General’s 2019 report, which found that the tribunal overturns around 60% of ODSP disability denials and implied that such a high overturn rate meant that the tribunal is granting benefits to people who do not qualify.¹⁷ What the Auditor General did not consider is that decision makers at the Social Benefits Tribunal have the benefit of new evidence and the in-person testimony of appellants, placing them in a better position to assess the evidence than the original ODSP decision-maker. The high overturn rate reflects a problem at the original decision-making level, not at the tribunal.

Rather than changing the tribunal, the focus should be on improving first-level decision-making to ensure that applicants are not wrongly denied. The independent quasi-judicial oversight role of the Social Benefits Tribunal should be preserved. The Ministry does not need to invest resources in changing an appeal process that is not broken. Instead, it should invest resources in filling the large number of vacancies at the tribunal in order to eliminate growing hearing delays.

- **Recommendation #4:** Maintain the independence and oversight functions of the Social Benefits Tribunal in order to ensure that administrative social assistance decisions do not wrongly deny supports that Ontarians need to meet their most basic needs. Invest in improving first-level decision making and in filling Social Benefit Tribunal vacancies.

5. Ensure social assistance recipients have access to the new Canada-Ontario Housing Benefit

The cost of housing has increased dramatically in Ontario over the past decade, while the shelter benefit for social assistance recipients has stagnated. By 2018, the average rent for a bachelor unit in Toronto was more than 150% of the maximum OW benefit for a single adult.¹⁸

The Canada-Ontario Housing Benefit, to be rolled out this year, will provide funding directly to individuals to subsidize the cost of private market rent. The program will prioritize households that “are on, or eligible to be on, a social housing waiting list and households in financial need living in community housing.”¹⁹ The almost 90% of OW recipients who live in private market housing would unquestionably fall within this priority group as would any ODSP recipient in the private rental market.²⁰ There is a great need for the housing benefit, as the overall social assistance caseload is more than three times the number of “rent-geared-to-income” units available.²¹

The details of the new benefit have not yet been announced. As the province designs the program, it should ensure that low-income tenants who are receiving social assistance are eligible, without any clawbacks from their monthly OW or ODSP benefits. Of course, implementing recommendation #1 to increase social assistance rates to reflect the actual cost of housing would greatly reduce the need by social assistance recipients for the housing benefit, and would allow the province to better facilitate access to affordable housing for other low-income tenants.

- **Recommendation #5:** Make the Canada-Ontario Housing Benefit available to social assistance recipients who are tenants, without any clawback of OW or ODSP benefits.

B. Investing in Justice for Workers

1. Strengthen enforcement of workplace laws and regulations

On September 25, 2019, Enrico Miranda tragically died while working at Fiera Foods. The 57-year old temporary worker was crushed to death by a machine that he was cleaning at the North York bakery. He was the fifth temporary worker to die at Fiera Foods and its affiliate companies since 1999. Providing more human resources to the Ministry of Labour to ensure workplace standards are met could prevent similar tragedies in the future. Although the Ministry of Labour conducted a series of proactive inspections of Fiera Foods in 2018, it did not inspect three of Fiera Foods’ affiliated factories, nor half of the 30 temp agencies that list Fiera or its affiliates as their client.

Investment in strong public enforcement of the legislation governing the health, safety, and rights of individuals in the workplace is critical to ensuring safe and decent working conditions for Ontarians. As an employment law expert has observed, enforcement matters because:

“Labour standards ultimately succeed or fail on the issue of compliance. Widespread non-compliance destroys the rights of workers, destabilizes the labour market, creates disincentives for law-abiding employers who are undercut by law-breaking competitors, and weakens public respect for the law.”²²

Failure to adequately enforce workplace legislation, which in Ontario includes both the *Occupational Health and Safety Act* and the *Employment Standards Act, 2000*, has the greatest impact on historically disadvantaged groups and communities. Women, racialized workers, recent migrants (including temporary foreign workers) and single parents are more likely to be working in precarious jobs²³. Workers in these forms of “non-standard”

employment, including temporary, part-time, or contractual employment, are more vulnerable to employer exploitation and abuse^{24,25}. Not surprisingly, employment standards violations such as unpaid wages are more likely to be found in workplaces with these features²⁶.

The law is what the law does, and in the current climate a swift and strong enforcement response to uphold the employment rights of Ontarians is needed.

- **Recommendation #6:** Increase the number of inspectors under the *Occupational Health and Safety Act* and the *Employment Standards Act*, in order to ensure safe working conditions and proper pay for Ontario's workers.

2. Increase the minimum wage to \$15 per hour and implement “equal pay for equal work”

There was legislation to increase the minimum wage to \$15 per hour effective January 1, 2019. However, the Ontario government cancelled that increase and froze the minimum wage at \$14 per hour until October 2020. This freeze imposed a real dollar wage cut on the province's lowest paid workers because the cost of living increases each year. According to the current schedule, the minimum wage will not increase to \$15 for almost six years, by which time the minimum wage will once again fall below the poverty line.²⁷

Raising the minimum wage is good for the economy. After the minimum wage increased from \$11.60 to \$14 in 2018, Ontario's unemployment rate dropped to the lowest level since 2000;²⁸ 139,000 net jobs have been created year-over-year; and, job and wage growth outstripped the rest of Canada in low-wage sectors such as food and accommodation.²⁹ In fact, market analysts from major banking institutions note that the persistence of strong sales and profits in a tight labour market makes the current economy quite capable of absorbing the minimum wage increase.³⁰

As noted by the Workers' Action Centre and Parkdale Community Legal Services in submissions before this legislative committee:

The \$15 minimum wage is a much-needed boost to the economy. Proceeding with the scheduled \$15 minimum wage on January 1, 2019 would put money into the economy faster through consumer spending. Household spending makes up 54 percent of gross domestic product. Almost half of Canadians report living pay cheque to pay cheque (47%). This slows down the economy. Low income households spend their minimum wage increase on essentials, especially for their children. This is money that goes into local economies which is unlike tax breaks or wage increases to the wealthiest, who save more and spend a smaller percentage of their income.³¹

ISAC concurs with these advocates and reiterates that legislating a \$15 minimum wage with annual adjustment in line with increases in the Consumer Price Index is the best strategy for reducing poverty and boosting the economy.

Workers who are doing similar work should be paid the same. Under the current *Employment Standards Act*, however, employers are entitled to pay temp agency workers, contract and part-time workers at different rates compared to full-time permanent workers

doing similar jobs. Differential pay on the basis of employment status is an arbitrary and unjustified distinction affecting more than one in five employees in Ontario. The failure to ensure “equal pay for equal work” puts less money in the pockets of Ontarians to reinvest into the economy, and disproportionately affects women, recent immigrants, young and older workers, and racialized workers.³²

- **Recommendation #7:** Immediately increase the minimum wage to \$15 per hour, restore annual indexation to the Consumer Price Index, and implement laws to ensure that workers who do similar work receive equal pay.

3. Restore personal emergency leave and paid sick days

Ontario is falling behind other jurisdictions in Canada that provide for paid sick or personal leave. On September 1, 2019, changes to the *Canada Labour Code* went into effect to grant approximately 900,000 federally regulated employees with three paid personal leave days, which can be used for illness and other prescribed circumstances.³³ Meanwhile, in Prince Edward Island, employees are entitled to one paid sick day after five years of continuous service with the same employer.

Ontario currently does not provide for paid sick leave for workers. Last year, the province eliminated a provision that ensured workers had 10 job-protected emergency leave days (two of which would be paid), a change that has negative budgetary implications for the province. Instead, workers can only take three sick days, three “family responsibility leave” days and two days for bereavement following the death of a close family member. None of these leave days are paid.

Reinstating paid sick leave for Ontario workers will lower costs to the province’s health care and economy, protect workers and increase workplace productivity. It would also bring Ontario in line with other jurisdictions in Canada.

A study on paid sick leave for the World Health Organization has noted that “the absence of paid sick days forces ill workers to decide between caring for their health or losing jobs.... The absence or gaps of paid sick leave leads to important costs for the economy and avoidable expenditure within health care systems.”³⁴

Numerous studies have shown that when workers have access to paid sick days, they and their co-workers are more productive and put less of a burden on public health resources.^{35,36} As Dr. Jesse McLaren and Dr. Kate Hayman recently argued, “We can either pay for sick days, or pay for it with sick workers, sick coworkers, sick clients, and more overcrowded hospitals.”³⁷

- **Recommendation #8:** Reinstate 10 Personal Emergency Leave Days, including seven days as paid leave.

C. Investing in Access to Justice

Ontario’s network of legal clinics provide legal services to low-income communities in such areas as social assistance, housing, health, employment, and human rights. Clinics are

small, independent, non-profit agencies that are governed by community-elected boards of directors and funded by Legal Aid Ontario.

Last year, the budget for Legal Aid Ontario was cut by a catastrophic 30%, \$15 Million of which was allocated to legal clinics. The Income Security Advocacy Centre, for instance, was cut by just under \$200,000. These cuts have had devastating consequences for low-income people in Ontario, who depend on legal aid for access to justice. As a result of the cuts, clinics have had to lay off staff, reduce intake, stop taking some complicated cases, and limit their public outreach and education. The drop in services is felt across the province.

Investing in legal aid is fiscally prudent. A recent report by the Canadian Forum on Civil Justice, which comprehensively reviewed the return on investment that comes from investing in legal aid, found that each dollar invested in legal aid could multiply in vast costs savings in other areas.³⁸ It also leads to better individual and community well-being, as low-income Ontarians get legal help in staying in their homes, maintaining their incomes, and overcoming societal barriers.

As a result, Ontario should immediately reverse the cuts to legal aid. Although we welcome the Attorney General's decision to cancel the planned 2020/21 legal aid cut, that does nothing to repair the damage done to the access to justice and substantive rights of low-income and marginalized individuals and communities by last year's budget.

For Ontarians, access to justice also requires having timely recourse to public institutions to assert their legal rights and entitlements. This is why our Recommendation #4, on maintaining the independence of the Social Benefits Tribunal and filling its many vacancies, is of utmost importance. It is at that tribunal that social assistance recipients can assert their rights in case of a dispute. Our recommendation #6, to strengthen the Ministry of Labour's enforcement functions, is similarly crucial. Ontario's workers depend on inspections to vindicate their rights in the workplace.

- **Recommendation #9:** Reverse the cuts to Legal Aid Ontario and make significant investments in access to justice for Ontario's workers and social assistance recipients.

Thank you for your consideration of our submissions.

End Notes

¹ See, for example, annual reports that demonstrate that Ontario's social assistance rates are far below the poverty line: Anne Twedde & Hannah Aldridge (November 2019), "[Welfare in Canada, 2018](#)" (Toronto: Maytree) at p. 28.

² Noah Zon and Thomas Granofsky (2019), "[Resetting Social Assistance Reform](#)" (Toronto: Ontario 360, Munk School of Global Affairs & Public Policy, University of Toronto) at p. 13.

³ Noah Zon and Thomas Granofsky (2019), "[Resetting Social Assistance Reform](#)" (Toronto: Ontario 360, Munk School of Global Affairs & Public Policy, University of Toronto) at p. 13.

⁴ O. Reg. 222/98, s.30, 31: <https://www.ontario.ca/laws/regulation/980222>; O. Reg 134/93, s. 41, 42: <https://www.ontario.ca/laws/regulation/980134>.

⁵ In 2018 (the most current year for which data is available), average rent for a one-bedroom apartment in Ottawa, for example, is \$1023 and is \$1,261 in Toronto. The cost in Barrie is \$1035 and in Peterborough it's \$850. The cost of a Nutritious Food Basket in Ottawa is around \$300 for a single person, according to Ottawa Public Health. In York Region, it's \$292. In Thunder Bay, \$250. See: Canada Mortgage and Housing Corporation. 2018. *Rental Market Report – Ontario Highlights – 2018*: <https://www.cmhc-schl.gc.ca/en/data-and-research/publications-and-reports/rental-market-reports-canada-and-provincial-highlights>. Public health units in Ontario publish annual Nutritious Food Basket statistics to monitor the cost and affordability of a nutritious diet for individuals in various age and gender groups. These numbers represent the NFB amount for an average single adult male in these communities.

⁶ Daily Bread Food Bank (2019), "[Who's Hungry? 2019](#)" (Toronto: Daily Bread Food Bank) at pp. 21-23.

⁷ See discussion of the multiplier impacts of investment in low-income benefits in federal 2016 budget papers at page 255: <https://www.budget.gc.ca/2016/docs/plan/budget2016-en.pdf>.

⁸ Nate Laurie (2008), "[The Cost of Poverty: An analysis of the economic cost of poverty in Ontario](#)" (Toronto: Ontario Association of Food Banks).

⁹ Anita Khanna (2016), "[2016 Report Card on Child and Family Poverty in Canada: A Road Map to Eradicate Child and Family Poverty](#)" (Campaign 2000) at p. 1.

¹⁰ Stuart Morris, Gail Fawcett, Linden R. Timoney & Jeffrey Hughes (December 3, 2019), "[The Dynamics of Disability: Progressive, Recurrent or Fluctuating Limitations](#)" (Ottawa, Statistics Canada) at p. 27.

¹¹ Noah Zon and Thomas Granofsky (2019), "[Resetting Social Assistance Reform](#)" (Toronto: Ontario 360, Munk School of Global Affairs & Public Policy, University of Toronto) at p. 21.

¹² Toronto Star (December 10, 2019), "<https://www.thestar.com/news/gta/2019/12/10/province-offers-no-comfort-to-disabled-who-fear-loss-of-support.html>" ("I think the auditor general's report shows we need to do something when it comes to ODSP in particular, and we made a commitment to do that... We just want to make sure that we do the right thing that's going to have the best benefit for those who are receiving it.")

¹³ Michael Mendelson (Maytree Fellow) (November 19, 2019), "Is Ontario Disability Support Program (ODSP) caseload increasing?" (Presentation to the Centre for Research on Work & Disability Policy).

¹⁴ John Stapleton, "[The 'Welfareization' of Disability Incomes in Ontario](#)" (Toronto: Metcalfe Foundation) at p. 5.

¹⁵ Garima Talwar Kapoor (January 2020), "[System Transformation in Ontario Works: Considerations for Ontario](#)" (Toronto: Maytree) at p. 6.

¹⁶ Garima Talwar Kapoor (January 2020), "[System Transformation in Ontario Works: Considerations for Ontario](#)" (Toronto: Maytree) at p. 2.

¹⁷ Auditor General of Ontario (2019), "[Annual Report 2019: Section 3.09: Ontario Disability Support Program](#)" (Toronto: Queen's Printer for Ontario) at p. 544.

¹⁸ Garima Talwar Kapoor (January 2020), "[System Transformation in Ontario Works: Considerations for Ontario](#)" (Toronto: Maytree) at p. 8.

¹⁹ Canada Mortgage and Housing Corporation (December 19, 2019), "[Governments of Canada and Ontario Sign Canada's First Housing Benefit](#)" (Ottawa: CMHC).

²⁰ Garima Talwar Kapoor (January 2020), "[System Transformation in Ontario Works: Considerations for Ontario](#)" (Toronto: Maytree) at p. 7.

²¹ Garima Talwar Kapoor (January 2020), "[System Transformation in Ontario Works: Considerations for Ontario](#)" (Toronto: Maytree) at p. 10.

²² Harry Arthurs (2006). "Fairness at Work: Federal labour standards for the 21st century" (Gatineau: Human Resources and Skills Development Canada) at p.53.

²³ A. Noack, and L. Vosko (2011), "[Precarious Jobs in Ontario: Mapping dimensions of labour market insecurity by workers' social location and context](#)" (Toronto: Law Commission of Ontario) at p.27.

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- ²⁴ Metro Toronto Chinese and Southeast Asian Legal Clinic (2016), "[Sweet & Sour: The struggle of Chinese restaurant-workers](#)" at p.4.
- ²⁵ L.F. Vosko, A.M. Noack, and E. Tucker (2016), "[Employment Standards Enforcement: A Scan of employment standards complaints and workplace inspections and their resolution under the Employment Standards Act, 2000](#)" at p.29.
- ²⁶ Michael Mitchell and John Murray (2017), "[Changing Workplaces Review: Agenda for Workplace Rights, Final Report](#)," at p. 57; Kevin Banks, "[Employment Standards Complaint Resolution, Compliance and Enforcement: A Review of the Literature on Access and Effectiveness](#)" (Toronto: Ontario Ministry of Labour, 2015) at p. 44.
- ²⁷ Workers Action Centre and Parkdale Community Legal Services (November 6, 2019), "[Submission to the Standing Committee on Bill 47](#)" at p. 3.
- ²⁸ Statistics Canada, Labour Force Survey, Table 14-10-0019-01, (seasonally adjusted data).
- ²⁹ Ministry of Finance, Ontario Employment Report: Second Quarter of 2018. Online: <https://www.fin.gov.on.ca/en/economy/employment/>
- ³⁰ Krishen Rangasamy (August 10, 2018), "[Canada Watch: Economics and Strategy](#). National Bank of Canada."
- ³¹ Workers Action Centre and Parkdale Community Legal Services (November 6, 2019), "[Submission to the Standing Committee on Bill 47](#)" at pp. 4-5. Bill 47, *Making Ontario Open for Business Act*, amended a number of statutes, including the *Employment Standards Act, 2000* and the *Labour Relations Act, 1995*.
- ³² Michael Mitchell and John Murray (2017), "[Changing Workplaces Review: Agenda for Workplace Rights, Final Report](#)," ; Statistics Canada, CANSIM tables 282-0069 and 282-0073.
- ³³ *Employment Standards Act, RSPEI 1988*, c E-6.2 at s. 22.2(4). Available at: <http://canlii.ca/t/8d6j>.
- ³⁴ Xenia Scheil-Adlung and Lydia Sandner (2010), "[The Case for Paid Sick Leave. World Health Report Background Paper](#)" at p.9.
- ³⁵ Mark Daku and Jody Heymann (2014), "[Ensuring equitable access to sick leave](#)" Canadian Medical Association Journal. September, 186(13) pp. 975-976.
- ³⁶ Soumitra Bhuyan et al. (2016), "[Paid sick leave is associated with fewer ED visits among US private sector working adults](#)" American Journal of Emergency Medicine. 34(5), pp. 784-9.
- ³⁷ Kate Hayman and Jesse McLaren (18 Aug 2018), "[Wage hike, paid sick days part of hallway medicine cure](#)," (Toronto Star)
- ³⁸ Lisa Moore and Trevor C.W. Farrow (2019), "Investing in Justice – A Literature Review in Support of the Case for Improved Access" Canadian Forum on Civil Justice.