



**Submission**  
**to the**  
**Minister of Training, Colleges**  
**and Universities**  
**on Apprenticeship**  
**by the**  
**Ontario Federation of Labour**

**May 2006**



**ONTARIO FEDERATION OF LABOUR (CLC) • FÉDÉRATION DU TRAVAIL DE L'ONTARIO**

15 Gervais Drive, Suite 202, North York, Ontario M3C 1Y8 Telephone: (416) 441-2731 Fax: (416) 441-1893 Web: <http://www.off-fto.on.ca>

*Annex A* of the *Canada-Ontario Labour Market Partnership Agreement* sets out the areas in which the federal and provincial governments intend to cooperate to “expand and enhance apprenticeship.” As such, we have grouped our issues for discussion under the themes listed in *Annex A*.

## **1. Enhancing and expanding access to apprenticeship:**

### **Defining Apprenticeship**

The Ontario Federation of Labour believes that it is critical to preserve the integrity of the apprenticeship program through the maintenance of whole trades certified as a matter of law and providing inter-provincial transportability through the Red Seal program.

Apprenticeship must be understood as an employment-based relationship where 80-90% of learning is completed through hands-on, adequately paid employment under the supervision of a regulated minimum number of qualified journeypersons; the remaining 10-20% of class training is undertaken at either public community colleges or non-profit Building Trades Training Centres.

Without this understanding, there is a risk that all general and unregulated work experience, be it co-op programs, practicums or summer and after-school work experience, will be labelled as apprenticeship. This is particularly a concern in light of *Bill 52 An Act to amend the Education Act* that opens the door to “equivalent learning” in exchange for secondary school credit.

In addition, a loose definition of what constitutes apprenticeship will drain critical public resources away from bone fide apprenticeship programs, while the value of certification in the trades will be eroded. Confusion between fully qualified trades people and partially qualified certificate-holders could well leave both employers and the general public at risk.

### **Ending the fragmentation of trades**

The establishment of the *Apprenticeship Certification Act (ACA)* by the previous Conservative government set in motion a dangerous and accelerating trend toward fragmentation of what should be understood as “whole trades”.

While the construction trades have been left intact under the long-standing *Trades Qualification and Apprenticeship Act (TQAA)*, all other sectors of the economy were marshalled under the *Apprenticeship Certification Act*.

Because the *ACA* does not contain critical regulations such as minimum ratios of journeypersons to apprenticeships, nor minimum rates of pay for apprenticeships, there are no cohesive standards that ensure apprentices receive proper training, supervision and mentorship from a variety of qualified journeypersons.

The certificate system ushered in by the *ACA* serves to fragment, de-skill and de-value the trades. Moreover, those aspiring for a career in the skilled trades are now faced with new financial barriers in the form of tuition fees and lost wages while they are in the classroom. These barriers do not exist under the *TQAA* precisely because apprenticeship is an employment-based relationship (wage earning) with only a fraction of time spent in a classroom setting.

The provincial government must return all apprenticeship training and qualification to the *Trades Qualification and Apprenticeship Act*.

### **Compulsory certification**

In addition to whole trades being restored to the *Trades Qualification and Apprenticeship Act*, more trades must be certified as a matter of law.

Compulsory certification will ensure increased flexibility and mobility, since only trained and tested trades people will be doing the work of the trade. Moreover it is a proven fact that compulsory certified trades have a higher apprenticeship training completion rate.

Enforcement mechanisms must be legislated to ensure compliance with compulsory certification regulations by both employers and individuals. This in turn will ensure that employers hire certified trades people, which will in turn improve the value of and demand for apprenticeship training.

### **Provincial Training Levy**

The Ontario Federation of Labour believes that a consultation must begin immediately on the establishment of a levy for a provincial training fund. The fund must, at least, require every employer who does not already pay for apprentices, to contribute one percent of payroll into the fund. Employers who hire apprentices or pay into a union or union-employer administered training trust fund would be exempted

based on current contributions and the amount generated by one percent of payroll. All sectors must be covered. Administration of the fund must involve employers, unions and the provincial government.

A percentage of the fund must be allocated to apprenticeship and the creation of jobs for apprentices. This apprenticeship portion of the fund must only be used for the training of apprentices in a whole trade.

The remainder of the fund needs to be available for workplace training for other than apprenticeship (for example, the costs to cover wages and training for workers being upgraded in their skills, or training for a new occupation).

This approach will allow us to see training for workers, including apprenticeship, funded. It will also remove the need for workers having to forego upgrading of skills because of costs.

## **2. Removing barriers to apprenticeship**

### **Elementary and Secondary Schools**

A lasting consequence of the Conservatives' decision to eliminate over \$1 billion in funding from elementary and secondary schools was the disappearance of shop classes in Ontario's public school system. These programs traditionally provided young people with exposure to a variety of trades. Without such exposure, students cannot possibly be expected to make informed decisions about potential careers in the skilled trades. Adequate public funding for space, equipment and teachers must be provided to public schools so that shop classes can be restored throughout the public school system.

Restoring shop programs would also provide immediate practical applications for and demonstrate the importance of acquiring high level mathematics, science, English and problem-solving skills. Improved school curriculum in this regard must be a top priority. Likewise, the number of guidance counsellors who can impart to young people the value and opportunities offered through the skilled trades must be increased.

Remove the reference to "community group" under the definition of "equivalent learning" in subsection 1 (1) b of Bill 52, so that community organizations are not given the right to grant certificates to students. This kind of measure privatizes education and by-passes our public education institutions who have the training and credentials to give high school certificates.

## **Community Colleges**

Historically, colleges of applied arts and technology have played a crucial role in the delivery of the in-school portion of apprenticeship training in Ontario. The in-class training required to complete apprenticeship programs has been provided by qualified trades people with extensive experience in the trades they teach, and in apprenticeship curriculum development. To support the role played by community colleges and provide excellence in learning, more public funding must be provided to ensure adequate student-faculty ratios and to ensure that colleges have up-to-date equipment with which students can gain hands-on experience. These funds should not be eaten up by administrative costs.

The introduction of tuition fees for the in-school portion of apprenticeship has downloaded the costs of training to the individual and tuition fees act as a deterrent to potential new apprentices entering the trades. These tuition fees do not provide additional revenue to the system because these fees are deducted from the already inadequate per diem funding that community colleges receive for such training.

The Ontario Federation of Labour believes that classroom fees and tuition fees must be eliminated. Shifting the burden of the cost of training down to the individual is not the answer for young people or anyone else who would consider pursuing a career in trades. In some trades, the average age of an apprentice is 26. These are workers who have mortgages, families and other financial commitments. Classroom fees create barriers for all workers, regardless of age.

### **3. Fostering high-quality learning**

#### **Provincial Advisory Committees**

The Ontario Federation of Labour believes that the Ontario government must continue to play a key role in setting standards and rules, and monitoring the enforcement of apprenticeship in Ontario. The government must adequately fund its Provincial Advisory Committees, viewing these committees as the decision-makers for their trades and their industry. These structures and processes cannot be devolved to education institutions without having an adverse effect on apprenticeship.

## **Increased funding**

Increasing government funding for public elementary schools, secondary schools, community colleges and non-profit Union Training Centres is critical. Funding must be made available to restore shop classes to the classrooms and to improve mathematics, science, problem-solving and English skills.

At the community college level, apprenticeship training has experienced a 7% real dollar decline in funding which impedes the ability of Ontario's public community colleges from investing in the equipment and technological requirements so essential to adequate apprenticeship training. The labour-intensive, hands-on approach of in-class training must be maintained and to do so, more money must be made available to hire qualified instructors.

Ontario has seen more Building Trades Unions sponsoring apprenticeship training in their whole trade. These non-profit centres are either jointly administered with employers or administered by unions on their own. Funding can come through the collective bargaining process by negotiating union or co-determined programs. These union-oriented apprenticeship programs are ensuring that high quality training in whole trades is taking place.

## **Monitoring and Measuring**

All program delivery and apprenticeship curricula must be monitored on an on-going basis to maintain the quality and integrity of the trade. All the regulations in the world will mean nothing if there are no mechanisms to ensure that the regulations are followed.

Training must also be measured in terms of completion rates: improving the number of apprenticeships will be meaningless if there is a high drop-out rate or if there is no corresponding increase in the number of journeypersons.

## **Unions**

Unions must be considered a key partner in the development of apprenticeship programs, training and labour adjustment.

Where embraced as full-partners in apprenticeship training and delivery, there is no doubt that trade unions enhance the quality of apprenticeship training, as noted in earlier comments on Union Training Centres. The Ontario Federation of Labour urges the Ontario government to recognize this fact and ensure that trade union partners are represented in all aspects of decision-making. In particular the Ontario Federation of Labour reiterates its call for the establishment of a Labour Market Partners Forum that can act as provincial-federal advisory body and make recommendations on the implementation of all Canada-Ontario Labour Market Adjustment measures.

#### 4. **Enhancing mobility**

##### **Pan Canadian Standards**

The Ontario Federation of Labour notes that Annex A specifically acknowledges the importance of the Red Seal program and calls for greater effort to “improve mobility and coherence of apprenticeship systems – common core curriculum standards, language benchmarks and essential skills.” Restoring coherence to apprenticeship training is critical in this regard. As noted earlier, changes brought in under the previous government have had the effect of fragmenting whole trades, de-skilling workers and reducing mobility.

By bringing all trades back under the rubric of the *Trades Qualification and Apprenticeship Act*, by insisting on mandatory certification and by expanding enforcement measures for both individuals and employers, Ontario can play a leading role in improving and expanding the Red Seal program and improving the mobility of skilled workers.

Ontario can help to set Pan Canadian standards, based on industry needs for all occupations identified as suitable for the apprenticeship training model. These standards should cover all aspects of training, including on-the-job and in-school training, training qualifications, examinations, and certifications.

When work is plentiful in other areas of the province or the country, trades people considering relocation must assess the impact of the costs associated with relocating either permanently or part-time. Some workers may have to leave a family at home that must be supported financially. In other words, the worker must earn enough money as a result of relocation to sustain secondary accommodation, food, and transportation while also sending money home to support the family. The government should consider making the worker’s costs of moving and relocation tax deductible for qualified trades people who move from one area to another to work. This is a modest

measure in view of the costs associated with and demoralizing effects upon an unemployed worker who is unable to move and must therefore remain unemployed.

## 5. **Promoting skills utilization**

### **Develop a Jobs Strategy**

Increasing access to and improving the completion of bona fide apprenticeship training in Ontario will mean little if there are no decent jobs available for skilled trades people.

Ontario must play a leadership role in developing a jobs strategy that takes into account the unique needs of Northern and rural communities and develops a broader vision for long-term, sustainable jobs.

### **Promoting and Enforcing Trades Qualification**

Enforcing the regulations set out by the *Trades Qualification and Apprenticeship Act* is crucial to ensure that employers hire qualified, certified trades people, to ensure that standards are being respected and that health and safety is promoted in the workplace. Government enforcement measures will help to reduce the underground economy, ensure that employers hire skilled workers, and improve the mobility of the workforce.

This is particularly important in the area of Provisional Certificates issued under the *TQAA*. There is little follow-up after a provisional certificate has been issued so many provisional certificate holders do not go on to either write or pass the trade exam.

By enforcing this aspect of the *TQAA* – ensuring that provisional certificate holders write the trade exam – the integrity of the trades can be maintained and again, the underground economy can be minimized. Moreover, those who do not pass the trade exam should be slotted into an appropriate level of apprenticeship. This in itself would provide a valuable opportunity to make effective use of the skills brought into Ontario by a variety of workers, such as temporary foreign workers, landed immigrants, refugees, unregistered workers and workers from other provinces.

Respectfully submitted,

**ONTARIO FEDERATION OF LABOUR**

cope343

