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Dear Committee Members:

Re: Securing Human Rights Justice for Women's Work – The Path to a 0% Gender Pay Gap

We are enclosing the Equal Pay Coalition's Preliminary Submissions to the Gender Wage Gap Review – Securing Human Rights Justice for Women's Work – The Path to a 0% Gender Pay Gap. The Coalition looks forward to discussing these submissions further with the Committee as it continues its consultation process. In that regard, the Coalition will be attending the February 22, 2016 Town Hall in Brampton.

a. Consultation Process and Interactive Dialogue

The Coalition gives the Steering Committee full permission to make these submissions publicly available. The Steering Committee is continuing to meet with stakeholders until late February 2016 and the Coalition reserves the right to make additional submissions as the Steering Committee's review and consideration process continues.

The Equal Pay Coalition in its May 4, 2015 letter to the Steering Committee called for a public, interactive review process in which stakeholder submissions would be publicly accessible and an ongoing dialogue amongst all key stakeholders facilitated. Unfortunately this has not occurred to date.

The public consultation phase of the Review process was substantially delayed - launching in early October 2015 with the release of the Committee's consultation documents and background paper. The Committee's Consultation summary was due at the end of

November but was not released publicly. Town Hall consultation meetings have been scheduled up to February 22, 2016.

While the Coalition has for years been publicly sharing its positions and documents and has continued to do so throughout this review process (see www.equalpaycoalition.org), the Coalition remains unaware of the positions being taken by other key stakeholders, including the business and employer communities, the Ontario Public Service (OPS) Working Group, and other provincial and local government entities, including the Ontario Pay Equity Commission, the Ontario Human Rights Commission and the Employment Standards Branch. All of these entities have important human rights obligations which impact on the gender pay gap.

Town Hall meetings have focused on individual presentations, and institutional stakeholder meetings have focussed on specific interests and have not included a cross section of perspectives. As a result, stakeholder submissions are being made in isolation without knowledge of the scope or range of perspectives and options that are being advanced or considered on this critical public policy initiative. This is not an acceptable approach and is not conducive to either understanding all perspectives and recommendations nor to building a consensus for a shared commitment to closing the gender pay gap as quickly as possible.

This process is in contrast to that adopted by the provincial Changing Workplace Review, taking place concurrently, which will allow for enhanced public engagement and accountability by circulating a preliminary options paper and soliciting further public input before finalizing its recommendations.

b. Coalition Request Re: Consultation Process

To enhance the quality and accountability of the Steering Committee's consultation process, the Equal Pay Coalition requests that:

The Steering Committee make stakeholder submissions and research available online in February 2016 to allow full transparency and an effective consultation process.

The Steering Committee provide a written summary of its consultations, preliminary research findings, and options for strategies that will be made available to stakeholders and to the public online by mid-March 2016. This summary should encompass its public consultations through Town Halls and stakeholder meetings, its research, and its consultations with the OPS Working Group.

The Steering Committee schedule a further public forum to facilitate a multi-perspective discussion involving key stakeholders from business, government, labour and community organizations that would take place around Equal Pay Day in April 2016. Such a public discussion would elicit more focused feedback on potential strategies to close the gender pay gap and on their potential implications and effectiveness. Such a forum would also facilitate an open, public dialogue on the most appropriate immediate, short-term and longer-term strategies to close the gender pay gap.

The Steering Committee provide the opportunity for any further written submissions in light of the above process by end of April 2016.

The Coalition submits that this proposed process will enhance the ability of the Committee to make effective recommendations.

c. Coordination of Gender Wage Gap Review with Changing Workplace Review

Both the Gender Wage Gap Review and the Changing Workplace Review are conducting critical reviews of the capacity of Ontario's employment relations systems to deliver work justice for Ontarians. Despite the fundamental impact of the operation of the *Labour Relations Act* and *Employment Standards Act* systems on women workers and their capacity to earn income on terms equal to men, the Reviews have not been mandated to work together.

Furthermore, as the Coalition stated in its May 4, 2015 letter to the Wage Gap Review Committee, the CWR Committee has been given substantially more resources and independence to carry out its functions. The Coalition is very concerned that the Gender Wage Gap Review was not accorded the same independent status and resources and believes that this reflects an ongoing problem of not giving sufficient priority to the human rights crisis of the gender pay gap. The Committee should be provided with sufficient resources to carry out its very important mandate including the process the Coalition is recommending above.

d. Immediate Recommendations

In addition, the Coalition wishes to draw to the Committee's attention its request in the attached submissions that the Commission call immediately for the following actions:

In terms of immediate action, we need to get the gender pay gap down by 3% in 2016 in order to start meeting the timetable of reductions required to meet the 0% gender pay gap goal by 2025. We are already in January. Much needs to be done immediately to achieve that 2016 goal.

The Coalition therefore requests the Committee to issue now an interim report identifying the following immediate actions which can be taken without the need for further consultation.

(a) Request the Government working with the Pay Equity Commission, Ontario Human Rights Commission and Employment Standards Branch to mount a substantial and resourced public campaign between now and including and after Equal Pay Day on April 19, 2016 which identifies:

(i) The extent of the gender pay gap, its harmful impacts and the need to close it to generate a fair and inclusive economy;

(ii) The Gender Pay Gap as a human rights crisis which must be acted upon immediately and thereafter till closed;. and

(iii) The current human rights mechanisms which are available to address the problem.

(b) Request the Pay Equity Commission to mount an immediate public campaign to advertise the rights and obligations under the Pay Equity Act and the intention of the

Commission to vigorously enforce the Act, including through widespread audits across the province.

(c) Request the Ontario Government working with the agencies which it publicly funds to make the necessary funds available so that public sector agencies can pay identified pay equity adjustments owing under the Pay Equity Act.

(d) Appoint by Equal Pay Day on April 19, 2016, an interim Labour Market Equality Commissioner, reporting directly to the Legislature and the Premier, who can be in place to start coordinating the development and implementation of Ontario's plans to close the gender pay gap.

(e) Effective April 1, 2016, increase the minimum wage to \$15 per hour

(f) Implement a gender and equity lens in the current provincial budget process and in cabinet and ministry decision-making.

(g) The Ontario Government abandons its objections to the Pay Equity Hearings Tribunal application to ensure women in predominantly female workplaces using the proxy comparison method can continue to maintain pay equity using their external proxy comparator and works to arrive at an appropriate resolution of the issues.

(h) The Ontario Government abandons its defense of the Association of Ontario Midwives application to the Hearings Tribunal and works to resolve the pay equity maintenance issues for midwives and other government funded professionals who are not covered by the Pay Equity Act.

Concluding comments

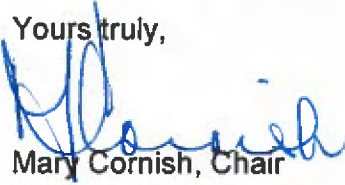
The Coalition's submission has detailed the systemic discrimination Ontario women experience throughout their lives which creates and sustains the economic inequalities they face in Ontario's labour market. Getting from 31.5% gender pay gap to 0% will take a tremendous effort. But it is time to put women in all their diversity at the head of line in terms of economic and social priorities. Ontario needs to stop leaving women languishing in lower paid inferior jobs or without jobs at all because of their care responsibilities or the barriers they face in gaining decent work.

It is also time to make sure there are concrete plans to ensure those women who are most disadvantaged and suffer greater economic inequalities are given priority attention.

Time is ticking away until the target date of 2025. Urgent action is needed starting immediately and continuing over the 10 year period. We need to unlock the promise of Ontario by unlocking the promise in all of Ontario's women.

We know that your Committee shares our commitment to close the gender pay gap and look forward to continuing the dialogue with you.

Yours truly,



Mary Cornish, Chair

c.c. Members, Equal Pay Coalition