

CHILD LABOUR IS NO ACCIDENT: The Experience of BC's Working Children



This paper is published by First Call: BC Child and Youth Advocacy Coalition.

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Update: Child Labour is No Accident: The Experience of BC's Working Children, May 9, 2013

On the eve of publishing this report, information was provided to project researchers that expands on child work-related injury data and the risks working children face in BC. This data and analysis is provided separately as an addendum. Please visit www.firstcallbc.org to read the update.

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INTRODUCTION

First Call has been monitoring the issue of employment standards for children in British Columbia since the passage of Bill 37 in 2003. Bill 37 amended the Employment Standards Act to effectively lower the work-start age in BC from 15 to 12 by eliminating the requirement that the Employment Standards Branch issue a permit to an employer prior to hiring a 12- to 14-year old. Now, in place of having an Employment Standards officer determine the suitability of a workplace for a 12- to 14-year old, a letter from a parent is all that is required. The implicit notion that a parent is responsible for assessing the safety of a workplace is both false and dangerous.

The BC Liberal government of the day justified the change to employment standards for children as part of a “cutting red tape” agenda, emphasizing the need to make it easier for employers to hire children under the age of 15. Supposedly, this was meant to address labour shortages in the agriculture sector, though from our research we know that relatively few children seem to be working in agriculture.

A major challenge for First Call in monitoring the effects of Bill 37 has been collecting data. In most of Canada, as in BC prior to Bill 37, employers are restricted from hiring children in regular employment except in special circumstances. As a consequence, there are almost no systems in place to collect data about the experience of young people in the workforce. To remedy the lack of data, First Call undertook research to gather information directly from BC children and youth who are currently working or who have recent work experience. During 2012, 129 young people were surveyed and/or interviewed individually or in focus groups and asked about their experiences of work.

This report brings together this research with other existing studies to examine the consequences of the legislative changes in BC in relation to three areas of impact: health and safety, wages and working conditions, and education. It also contrasts BC’s law with employment standards in other jurisdictions.

Other jurisdictions show us ways to legislate to ensure that teenagers engage in age-appropriate work, while still gaining work experience. We know that work experience is important, particularly for older teenagers; however, working too many hours or at inappropriate work sites can compromise educational outcomes.

In changing the Employment Standards Act the provincial government eroded the mechanisms that protect children. This is unacceptable, particularly in a nation like Canada that is signatory to the UN Convention on the Rights of the Child. Now, more than ever, we need to take action to ensure that children are protected from injury and economic exploitation. The recommendations in this report target specific areas in which we can begin to work towards this goal.

“We instinctively cling to century-of-the-child ideas about childhood, believing children should be protected by society and provided the means to flourish and to develop healthfully. Yet we permit, indeed encourage, corporations to exploit and ignore children’s unique needs and vulnerabilities when it is profitable for them to do so. Our instincts about childhood and children are thus profoundly belied by our practices. [...]

“Regulation is not government against the people, as its critics suggest, but rather a mechanism through which the people, as citizens, can protect their, and their children’s, interests. No doubt the regulatory system falls short of such ideals in its actual operations, but that is a reason to work to make it better, not to abandon it.”

From *Childhood Under Siege*
Joel Bakan

A policy framework is in development and will follow this report. First Call: BC Child and Youth Advocacy Coalition will recommend specific improvements to the Employment Standards Act and regulations to bring BC's law into compliance with the commitments Canada and BC have made as signatories to the UN Convention on the Rights of the Child, with the International Labour Organization Convention 138 standards, and with best practices in other jurisdictions.

KEY FINDINGS

Key findings from this study include:

- Sixty per cent of young people who participated in this study started work at age 14 or under, but only 24 per cent of them reported that a parent had given written permission for them to start work, as required by the current legislation.
- The largest group of study participants, roughly one third, worked in food services and accommodation, fields that many other provinces prohibit children from working in. Nine per cent of participants said that their first jobs were in construction, a field that, not surprisingly, is also often restricted for children in other jurisdictions.
- Data indicates that in 2011 WorkSafeBC paid out \$212,185 for disability claims on behalf of children aged 12 to 14 who were injured on the job. This is the highest amount paid in a single year over a five period starting in 2007. In the previous year, 2010, WorkSafeBC paid \$33,261 in disability claims for children in the same age group.
- BC is the only Canadian province that does not prevent younger teenagers from working at night. Most provinces have stronger protections for children under 15, and many limit the types of occupations open to children and youth.
- Forty-three per cent of the youth we spoke to reported sustaining workplace injuries. The most common injuries were burns, cuts and falls. Several study participants reported serious injuries, including a 12-year-old with burns down the front of his body from battery acid, a 13-year-old with a broken wrist and back injury from a fall, and another with blistered fingers from a burn on a grill. The latter reported being told she was not allowed to leave work to seek medical treatment.
- Lack of pay for training is a common theme among working youth. Employers will ask youth to come in for a “try out” shift, or they will be asked to start working as part of the interview for the position. Youth also reported doing unpaid training at home with online orientation sessions or manuals. Many employees were also made to pay for uniforms, a practice that is illegal.
- Working too much has a negative impact on education:
 - 16 per cent of participants reported having dropped out of school due to their work schedule and/or financial need,
 - 19 per cent reported they had missed classes because of work,
 - 46 per cent reported being too tired and/or not having enough time to complete their homework or participate appropriately at school as a result of working too much.
 - By contrast, working had a positive effect on the education of 19 per cent.

- About half of study participants reported they did not receive adequate (or in some cases any) training at their jobs.
- The law requires 12- to 14-year-olds to be supervised by an adult at all times. One 15-year-old youth reported supervising 14-year-olds in a fast food restaurant and did not feel safe with that level of responsibility.
- Over the past decade BC has shifted from relying on workplace inspections and a permit system to ensure the protection of 12- to 14-year-olds to strategies that emphasize parental responsibility for children's safety in the workplace and increased public education efforts.
- Many young people do not think it is realistic to expect a parent to have a role in assessing their workplace saying such things as, "Employers would never hire someone who came in with their mom."
- Many young people are not aware that they can make a complaint to the Employment Standards Branch about things like unpaid wages.

RECOMMENDATIONS

First Call is calling for the development and enactment of legislation improving protection for children in the workplace in the next legislative session. The Government of British Columbia must take seriously its responsibility to children.

BC also has a responsibility to our global neighbours to maintain high standards. The well-being of all the world's children should be at the centre of decision-making.

Improvements should include:

- Establishing a minimum work-start age of 15 in compliance with the UN Convention on the Rights of the Child.¹
- Imposing restrictions on the occupations, tasks, and times of day that children can work.
- Increasing Employment Standards Branch inspections of worksites where children are most likely to be working, including random inspections.
- Establishing a child labour advisory group that includes a broad representation of child and youth advocates, including young people with recent work experience in the higher injury occupations.
- We strongly advise the government to find ways to keep track of the employment of children. On-going data collection about how many children are working and at what occupations and tasks is needed in order to monitor their safety.
- Requiring WorkSafeBC to publish the same detailed injury claims reports on 12- to 14-year-olds as are currently produced for young workers (ages 15 - 24).

Finally, the federal government should also implement a work-start age for young persons under federal jurisdiction. All children in Canada should be afforded the same protections regardless of where they live.

Recommendations from study participants

- Restrict the hours of work for young persons. It's hazardous to walk home after late night shifts.
- There should be better supports for families so their children don't have to work.
- Some servers have to give a percentage of their tips to other staff.
The minimum wage should go up, and servers should get the regular minimum wage.
- Businesses should be forced to inform employees about their rights.
- Unions need to play a bigger role with young workers. Labour is a transaction, and employers have lots of power.
- Worker rights are not being respected and enforced.
- A higher wage should be paid for shifts worked on call.
- Employers should be clear about the rules of a job when the worker starts it.
- Construction sites need more oversight, including spot inspections.

RESEARCH AND INFORMATION COLLECTED (2003 – 2013)

What We Know

Who are the children and youth working in BC?

One of the objectives of this project has been to gather information about the work experiences of young people (ages 12 to 18) in BC since the legislative changes took effect in 2004. Sources of reliable information are limited due to a lack of provincial government data gathering and because Statistics Canada does not inquire about persons who work under 15. In this section we look at data that is available from previous studies by civil society organizations.

The Adolescent Health Survey (AHS)² is a questionnaire used to gather information about youth health in BC. The AHS is conducted by the McCreary Centre Society in collaboration with the provincial government and public health system, and with the co-operation of BC's school districts. To date, over 100,000 students have participated in the AHS survey since 1992. The most recent survey was conducted in 2008, when a representative sample of 29,075 students in Grades 7 to 12 participated.

The AHS includes questions about whether or not students work and if so, how many hours they work per week. The table below, using data from the 2008 survey, shows the high percentage of students who were working during the school year, and how workforce participation increases as students age.

Overall, 41 per cent of students in grades 7 to 12 worked during the school year, up from 37 per cent in 2003. Twenty per cent of students (1 in 5) 12 or younger were working, as were 23 per cent of 13-year-olds and 27 per cent of 14-year-olds. The split between children 14 and under and 15- to 18-year-olds was 24 per cent and 53 per cent respectively.

Table 1 shows the number of hours students reported working per week by age (percentages of hours worked may not add up to 100 per cent due to rounding).

| Age | 12 or younger | 13 | 14 | 15 | 16 | 17 | 18 |
|--------------------------|---------------|-----|-----|-----|-----|-----|-----|
| Did not work | 80% | 77% | 73% | 63% | 47% | 37% | 34% |
| Worked | 20% | 23% | 27% | 37% | 53% | 63% | 66% |
| Worked less than 5 hours | 15% | 15% | 12% | 10% | 9% | 9% | 9% |
| Worked 5-19 hours | 5% | 6% | 13% | 22% | 35% | 40% | 41% |
| Worked 20+ hours | 1% | 1% | 3% | 5% | 8% | 14% | 16% |

Table 1, Source: Adolescent Health Survey 2008 data, McCreary Centre Society

Across the province, among youth who worked, the data show male students were more likely to work 20 or more hours per week than female students, at 18 per cent vs. 14 per cent, respectively. Female students were more likely to work 5 to 19 hours per week, at 59 per cent vs. 54 per cent for males.

This is consistent with the trend data for Canadian 15- to 19-year-olds showing teenage males have consistently worked more hours per week than females.

Drawing on data from the 2008 AHS³, the McCreary Centre Society also released a report focused on Aboriginal youth health. Forty-two per cent of Aboriginal youth worked at a paid job during the school year (up from 37 per cent in 2003). Twenty-three per cent of those who worked put in more than 20 hours a week, higher than the 16% rate for the overall population. Thirteen per cent of these students who worked 20 or more hours a week often or always went to bed hungry (vs. 3 per cent who did not work), and 10 per cent of them did not expect to graduate from high school (vs. 3 per cent who did not work).

Table 2 breaks the workforce participation rate data for survey respondents of all ages into geographic regions. Data from both the 2003 and 2008 AHS surveys showed higher workforce participation in the North, Vancouver Island, Kootenay, and Interior regions of BC, and lower participation in Metro Vancouver and Fraser Valley areas. With the exception of the North Shore/Coast Garibaldi region, workforce participation was less than 40 per cent in Metro Vancouver and the Fraser Valley, going as low as 29 per cent in the City of Vancouver. In the rest of the province, participation exceeded 40 per cent, reaching as high as 50 per cent in the North West and 54 per cent in the East Kootenay.

In all regions, workforce participation increased between 2003 and 2008, except for North Vancouver Island, where it stayed steady at 46 per cent. Not all the increases were statistically significant.

| Region | Worked at a paid job during school year | |
|-----------------------------|---|------|
| | 2003 | 2008 |
| North West | 42% | 50% |
| Northern Interior | 41% | 42% |
| Thompson Cariboo Shuswap | 45% | 47% |
| Okanagan | 43% | 48% |
| Kootenay Boundary | 46% | 47% |
| East Kootenay | 50% | 54% |
| North Vancouver Island | 46% | 46% |
| Central Vancouver Island | 41% | 49% |
| South Vancouver Island | 43% | 48% |
| North Shore/Coast Garibaldi | 41% | 48% |

| | | |
|-------------------|-----|-----|
| Vancouver | 23% | 29% |
| Richmond | 31% | 36% |
| Fraser North | 34% | 35% |
| Fraser South/East | 29% | 38% |

Table 2, Source: Adolescent Health Survey 2008 data, McCreary Centre Society

The most striking change between 2003 and 2008 is the number of hours the surveyed students were working. The percentage of working students who worked more than 20 hours a week increased in all regions, most markedly from 11 to 19 per cent in the North West and from 12 to 24 per cent in the Northern Interior.

While government does not track the number of children under 15 working in BC, McCreary's 2008 AHS data indicated just under one quarter of 12- to 14-year-olds were working. Another study by Breslin, Koehoorn and Cole (2008)⁴ using 2005 survey data reported 41.5 per cent of 12- to 14-year-olds working during the school year.

Additionally, data from two Alberta studies⁵ indicates that between 5 and 10 per cent of 9-to 11-year-olds in that province performed waged work outside the home in 2008-2009, despite a work-start age of 12 in that province. BC's Employment Standards Branch tracks work permits granted for children under 12, but it is possible that BC may have a similar population of 9- to 11-year-olds working who are not all captured in the permit data.

The variations in the estimates about the numbers of children working in BC points to the need for government to use its resources and regulatory authority to step up and monitor this most vulnerable population, as advised by local children's advocates and international observers.

Why were changes made to the previous regulations?

Under the pre-2003 regulations, which had been in place since 1948, approximately 1 in 5 permit applications to hire a 12- to 14-year-old worker were turned down, and 3 in 5 were changed before approval. Permits applications were amended or denied because a labour standards officer deemed the work circumstances to be inappropriate or unsafe for children. The scrutiny given to permit applications demonstrates that 12- to 14-year-olds were not considered typical workers.

During the March 2004 budget estimates debate in the BC Legislature, then Minister of Skills Development and Labour Graham Bruce indicated that child labour laws were changed to fill labour shortages in the agricultural sector. The Minister stated:

“...last year there were some 2,000 jobs that were virtually unfilled, really, in the berry-picking side. ...What we've been attempting to do is to take a number of initiatives in respect to that sector of the agricultural industry and then, behind that, try to make — more to young people than others — an awareness that there are those jobs available to them, certainly in those months of May to September — a good time for them in that respect.”⁶

In a 2003 article in the Tyee, then Executive Director of the BC Agriculture Council Steve Thomson said that his group had lobbied for an end to the permit process, stating “they still need parental approval, and parents won't put children at risk.” In 2002, less than 1/100th (30 out of 3835) of the permits issued for hiring workers under the age of 15 were in the agricultural sector⁷. It's not clear from available records why employers in the agricultural sector were motivated to lobby for regulatory change. The Agriculture Council's Thomson told The Tyee that “none” of the permit applications prior to 2003 were turned down. It is possible that they were hoping to end an illegal practice of hiring children without a permit by reducing the work-start age.

Farm work is particularly dangerous for children. In the United States, farm workers face injury rates at nine times the national average.⁸

Officials representing the food services and retail sectors in BC stated that they did not lobby for changes to child labour laws⁹, although these sectors are common sites for the employment of young people.

According to The Tyee article, however, BC Chamber of Commerce president John Winter confirmed in 2003 that:

“Eliminating the government-reviewed permit system for workers under 15 years of age was only one part of a broader employers’ wish-list. The Chamber was consulted on the child labour changes as early as two years ago. ‘I can see no downside to it,’ he says. ‘We were looking for more flexibility to the Employment Standards Act, and a lot of what we wanted has occurred. This is just one example.’”¹⁰

A BC Legislative Committee report on the 2004 budget consultation process focused on cutting red tape, emphasizing that deregulation, viewed as a core Liberal mandate since coming in to power in 2001, had not yet gone far enough. The report specifically stated that employment standards were a problem, quoting the Canadian Federation of Independent Business’ concern with employment standards, and the BC Fruit Growers’ Association complaining about the need for school principals to approve of hiring 12- to 14-year-old students.¹¹

In April of 2012, Opposition Critic for Children and Family Development Claire Trevena raised the issue of employment standards for youth in the Legislature, questioning the lack of data about children and young people working.

MLA Moira Stillwell responded for the government: “First of all, 12- to 14-year-olds working in B.C. are safer today than ever through regulations that, in fact, limit hours of work and, importantly — I’ll come back to it — require parental approval and provide penalties of up to \$10,000 for non-compliance, as well as through safety programs administered by WorkSafeBC. Our regulations also set conditions for youth, such as prohibiting work during school hours and requiring adult supervision at all times.

“Businesses favour permissive child labour laws for a number of reasons: children will work for less than adults, they are more accepting of long or irregular hours, more willing to pay for uniforms and equipment required for the job, and will ask fewer questions about safety and training.”

Joel Bakan

“Under the previous system, the government issued on average about 400 permits per year. But the reality is that a greater number of children were being employed in British Columbia. That meant that for children without permits, there were no restrictions in place under the former regime. It also meant that if a 14-year-old in Prince George wanted to have a paper route after school, he would have to get a permit from Victoria, which is clearly silly. That’s why the government updated the Employment Standards Act in 2003 to protect all youth workers.”¹²

In fact, permits were not required for children working in “casual” jobs, including delivering papers and babysitting.

A January 2010 letter to First Call from then Minister of Labour Murray Coell reinforced the government’s position that the old permit system wasn’t working, so rather than try to improve it, they simply eliminated it. The same letter highlighted 2007 changes by WorkSafeBC to the Occupational Health and Safety Regulation, requiring “employers to provide all young or new workers with orientation and training specific to the work site and to record and document that training.” Regulations including “Grant’s Law” were also added to protect workers working alone. Coell emphasized WorkSafeBC’s educational initiatives to reduce young worker injuries as a protective mechanism.

About Grant's Law

Grant's Law was named after Grant De Patie, a young gas station attendant who was killed trying to prevent a robbery in 2005. The law enacted in 2008 required late-night workers to be separated from customers with a locked door or to work in pairs.

In 2012, under pressure from employers, "Grant's Law" was weakened to give employers other options including time lock safes and surveillance systems. Grant's parents and others who fought for more protections for overnight shift workers recently protested the changes, urging the government to reinstate the original rules. Currently in BC there is no regulation that would prevent any young person, including a 12-year-old, from working overnight shifts.

Are the rules being followed for 12- to 14-year-olds?

A 2005 study by the Canadian Centre for Policy Alternatives found that 58 per cent of working 12- to 14-year-olds reported that their parents had not given written consent to their employers, and 48 per cent said that their parents had not evaluated the safety of their workplace. In addition, 70 per cent of the 12- to 14-year-olds said that they had worked without adult supervision.¹³

Statistics from the Ministry of Labour show 980 complaints alleging 1,316 violations of the Employment Standards Act or Regulations made by or for young people to the Employment Standards Branch over five years from 2007 to 2011. Only 94 of them were confirmed in the Branch's records as contraventions. The remaining 886 allegations were resolved through voluntary settlement.¹⁴

Twelve of the contraventions involved hiring children under 12 without a permit, and 11 of these were children hired to hand harvest crops. Twenty-nine contraventions involved payment of wages upon termination, and 20 were violations relating to production of records. One contravention involved a child found working on a farm during school hours, and 5 contraventions related to the termination of employment. The remainder involved problems with payment of wages or leave entitlement.¹⁵

From our research, it would appear that young people filing a complaint against their employer is a rare occurrence. As noted below, children and youth often feel disempowered in their relationships with their employers, and, while many of them had valid complaints about wages and working conditions, none had ever filed a complaint. Although workers under 19 are exempted from using the Ministry of Labour's self-help kit – a tool meant to help employees resolve issues with employers without engaging in a formal process involving the Employment Standards Branch – the process for filing a complaint remains daunting. Most youth are reluctant to confront issues with their employer, even through the Employment Standards Branch, for fear of compromising their current or future employment. Indeed, many young people are not even aware that a complaint can be filed on common issues such as payment of wages upon termination.

The reliance on complaint-driven enforcement of employment standards has been identified as problematic in numerous studies. Researcher Barnetson points out:

"Minors are less likely than adults to know their rights and be able to determine if their treatment is lawful. To file a complaint, minors must face the power the employer wields due to the master-and-servant dynamic as well as the power differential associated with adult-child relationships. This situation raises the possibility that complaint-based enforcement of child labour laws is ineffective. If this approach yields few complaints, violations of child labour law becomes administratively invisible and the slim prospect of enforcement is unlikely to discourage violations."¹⁶

Barnetson also notes the evidence of widespread violations of employment standards in Canada. For example, Ontario's Provincial Auditor (2004) noted that between 40 and 90 per cent of proactive inspections in that province (varying by sector) found violations of minimum employment standards.¹⁷

Cuts to BC's Employment Standards Branch have made proactive inspections less frequent, something unscrupulous employers are likely aware of. In this regulatory milieu, where weak enforcement undermines the motivation of employers to meet even minimal standards, younger workers are particularly at risk of being victimized.

Lack of Data

When BC abandoned the permit system overseeing the employment of children under 15, it also abandoned any attempt to keep track of how many children in this age group are working and in what jobs.

Since 2003, the only information tracked by government is in the form of complaints, contraventions, and accepted injury claims, all of which rely on voluntary reporting by the worker or compliance by employers. In addition, information that might reveal a persistent workplace issue becomes available only after the fact, making it too late to prevent injuries.

Statistics Canada also does not track the participation of under 15's in the workforce. They have taken the view that the participation numbers of under 15's are too small in Canada to produce statistically significant data.

May started her first job at age 14 working in a thrift store. She didn't receive any training, and she worked alone while co-workers were on smoke breaks. Her parents never visited the worksite or talked to her employer. Her mother said she had no idea that writing a letter of permission was a condition of her daughter's employment.

Her workplace had a conveyor belt that she was not trained to use properly. Fortunately, she stood up for herself and refused to use it.

She never got paid for the last 13 hours of work at her job, and she didn't get a bonus she was promised for completing her first month of work.

What We Heard from Young People

Of the 129 participants in the survey, focus groups and interviews conducted by First Call, over 60 per cent reported that they started work at age 14 or younger. A surprising 11 per cent of respondents started work under the age of 12.

| Respondents' Work-Start Age | (n=25) |
|-----------------------------|--------|
| Under 12 | 11% |
| 12 | 15% |
| 13 | 14% |
| 14 | 22% |
| 15 | 20% |
| 16 and over | 18% |

Table 3, Source: First Call Study

Angela reported bullying and disrespect from older co-workers she was supervising. At the age of 15 she was supervising older workers as well as 14-year-olds, which is a violation of employment standards. She felt that it was too much responsibility, and it was not a safe environment.

Of those who started work at age 14 or younger:

- 24 per cent reported that their employer requested a letter of permission from their parents
- 65 per cent were not asked to supply permission, and
- 11 per cent weren't sure if their parents had given permission for them to start work.

A number of participants also reported being sent home early from work, being required to work late without notice, and working unpaid hours, including on call and cleaning up after the business closed. Many youth reported working alone, or without the supervision of an adult.

The majority of young people worked between 5 and 35 hours per week, noting that the number of hours reported included summer jobs in some cases. The majority of youth worked over 20 hours per week in their current jobs.

| Hours Worked Per Week | First Job (n=90) | Current Job (n=110) |
|-----------------------|------------------|---------------------|
| Under 5 | 11% | 11% |
| 5-12 | 37% | 26% |
| 13-19 | 12% | 11% |
| 20-35 | 27% | 36% |
| 36 and over | 13% | 16% |

Table 4, Source: First Call Study

Those who reported starting work at under the age of 12 worked between 4 and 36 hours a week in their first jobs, with an average of 16 hours a week. Some participants who started working at 12, 13 and 14 years old also reported working full-time hours in their first jobs.

The majority of youth began formal employment in food services and accommodations. Thirty-five per cent of participants had their first job in food services and accommodations, and 34 per cent of youth currently work in this sector. Interestingly, some other provinces ban this kind of work for children – in Ontario, for instance, 14-year-olds can work in the serving areas of restaurants, but you have to be 15 to work in a kitchen.

Retail, janitorial/landscaping/maintenance, arts/cultural/recreation/sports, and construction were the next most common first jobs. Only about 5 per cent of youth reported working in agriculture as either their first or current job.

Laura started work at 13. She has four scars from being burned on concession stand equipment. She was paid a \$7 an hour training wage at a second job she started working in the summer, even though she had already been doing similar work. She was given no explanation for the lower wage.

She and her young female co-workers were regularly harassed and intimidated by a male customer who asked numerous personal questions and made sexually harassing statements. Her parents gave a letter of permission when she started her first job at 13, but not her second job at 14. She said that employers hate parent involvement, and believes that she would get in trouble with her employers if her parents got involved.

Andrea was employed in a fast food restaurant in a neighbourhood that made her uncomfortable. The restaurant's hours changed from closing at 11:00 PM to staying open all night, and they hired more employees to cover the extra hours. A number of workers didn't want to work all night, so the hours were changed again. She was often sent home early while other staff stayed on.

Her hours were also cut when the minimum wage went up, and more hours were given to newer employees. Every paycheque was also short by a couple of hours worth of wages.

Previously she worked in another restaurant, where she had to work her first shift for free.

Even though Andrea has been burned by oil from deep fryers and grills, she was not allowed to wear long sleeves to protect her arms. Her fingers have been injured from having to scrub grills and she gets rashes from the dish detergent. She was diagnosed with eczema, but they won't excuse her from the job. She feels uncomfortable with the unassisted heavy lifting she has to do at work.

| Respondents' Work Sites | First Job (n=126) | Current Job (n=110) |
|--------------------------------------|-------------------|---------------------|
| Agriculture | 6% | 5% |
| Arts, culture, recreation, sports | 10% | 18% |
| Child care | 4% | 4% |
| Construction | 9% | 4% |
| Food service and accommodations | 35% | 34% |
| Forestry | 0% | 2% |
| Janitorial, landscaping, maintenance | 11% | 7% |
| Manufacturing | 1% | 0% |
| Office work | 6% | 3% |
| Retail | 20% | 25% |

Table 5, Source: First Call Study

Fifty-one per cent of respondents said they were very confident that they understood their rights as an employee, while 43 per cent said they were only somewhat confident, and 7 per cent said they were not confident that they understood their rights as an employee.

HEALTH AND SAFETY IN THE WORKPLACE

What We Know

Employment of a child under the age of 12 still requires a permit to be issued to the employer by the Employment Standards Branch as well as signed permission forms from the child's parent and school. The application completed by the prospective employer is one-page in length, and includes the statement "The work to be performed shall not be of a dangerous nature or detrimental to the welfare of the child." The application does not ask the employer to provide any other information about health and safety in relation to the particular workplace. The declaration that parents sign, and the endorsement that school authorities sign, are statements of permission only; no inquiries about health and safety issues are made. Any examination of the workplace prior to issuing a permit is the responsibility of the Employment Standards Branch.

Very few parents are qualified to assess the safety of a worksite and whether or not it is appropriate for a child. Furthermore, parents do not have the legislative authority or standing to intervene and enforce safety standards with an employer.

For 12- to 14-year-olds, the parental permission requirement appears very similar to the under 12 permission form. There is no requirement that parents either ask for or be provided with information about health and safety issues in the workplace.

Shortly after Bill 37 came into effect, WorkSafeBC conducted a focus group with parents at a meeting of the BC Confederation of Parent Advisory Councils. The goal of the session was to "collect opinions and ideas on current and required young worker resource materials aimed at parents." In their report on the session, the Ipsos Reid facilitators noted

"Parents first need to understand and take ownership of the young worker safety issues before they will offer to help promote prevention initiatives. Workplace safety is still perceived as the employer's responsibility."¹⁸

The report goes on to say,

“BCCPAC representatives are more involved with youth issues than the average parent. Nevertheless, these parents believe that employers are responsible for the children’s health and safety at the workplace.” Further, “The issue of young worker safety is not higher on the parent agenda because it is assumed that employers are responsible for their children at the workplace.”

These statements reveal two interesting and false premises in the line of inquiry. One, that parents are misguided in believing that employers are responsible for workplace safety and two, that parents must ‘take ownership’ of young worker safety.

The current WorkSafeBC focus on parental responsibility is at odds with section 115 of the Workers Compensation Act which clearly states:

- (1) Every employer must
 - (a) ensure the health and safety of
 - (i) all workers working for that employer, and
 - (ii) any other workers present at a workplace at which that employer’s work is being carried out...

As previously noted, WorkSafeBC has produced numerous materials since 2003 advising parents to become educated about on-the-job health and safety for their children. While greater education and awareness is always helpful, it remains the case that within the context of a virtually unregulated environment for child workers education does not change the fact that once a child is on the worksite, parents are powerless to ensure that the child is safe and that tasks are age appropriate.

The heightened efforts to raise awareness about workplace safety for children after the law changed also served to advertise the fact that 12-year-olds in BC could now work in all occupations, at all tasks, at any time of day.

Public education initiatives on young worker safety are no doubt well-intentioned, but the premise that parents, through communication with their children, will be able to keep them from harm is a flawed approach to public policy. Very few parents are qualified to assess the safety of a worksite and whether or not it is appropriate for a child. Furthermore, parents do not have the legislative authority or standing to intervene and enforce safety standards with an employer.

A special area of concern is the situation of recent immigrant and refugee families. Many of these parents have limited English language skills and little, if any, knowledge of employment rights and standards. Yet these are the same families who are over-represented in low income and unemployment statistics, and whose children may feel the greatest pressure to contribute to household income. The expectation of parental oversight of job safety in these circumstances is even more unrealistic.

The Canadian Coalition for the Rights of Children has found that:

- Children disproportionately experience violence in the workplace in Canada. For example, Quebec’s occupational health and safety board, the Commission de la santé et de la sécurité de la travail, estimated that young workers (aged 15-25) are 1.5 times more likely to be injured at work than are older workers.
- There is evidence that children are disproportionately subject to many kinds of violence and exploitation in the workplace, given the lack of full legal protection, lack of awareness of their rights and workplace regulations, and lack of power to negotiate safe working conditions.
- Children, due to their age and lack of experience, are at a disadvantage in the workplace. They can be subject to various forms of discrimination and exploitation, including lower wages for equal value of work compared to adult workers, and sexual and other types of harassment and/or abuse, including

intimidation. Children and young people seldom join trade unions or associations; their voice is not adequately represented in collective bargaining forums to ensure that their specific work related rights and needs are addressed.¹⁹

With virtually no reliable data on how many children under 15 years of age are in the workforce, and how the numbers have changed since BC's new law came into effect, First Call's 2009 report *What's Happening to Our Children?*²⁰ examined WorkSafeBC's accepted work-related injury claims for these age groups as an indirect indicator of workforce participation. The data revealed a disturbing, quantifiable trend: the number of accepted work-related injury claims for children between the ages of 12 and 14 had steadily climbed between 2004 – 2008.

- Accepted injury claims for all age groups (14 and under, 15, and 16-year-olds) fluctuate between 1998 and 2004. No particular trend was visible over that period.
- Beginning in 2004, a year after the law was changed, accepted injury claims began to increase in all age groups.
- Between 2004-2008, accepted injury claims for 12- to 14-year-olds increased ten-fold.
- For all age groups, injury claims were significantly higher after 2005 than they were at any time previous.

New Data on Injury Claims

The latest available data from WorkSafeBC shows that, while the number of accepted injury claims for both age groups dropped since 2008, there was a significant jump in the amount WorkSafeBC paid out in disability claims in 2011 (see Table 6). This indicates a likely increase in the severity of sustained injuries.

Overall, WorkSafeBC data from 2007 to 2011 indicates a total of 115 short term disability injury claims totaling \$409,417 were paid on behalf of children, aged 12-14, injured on the job.

Data shows WorkSafeBC Approved Injury Claims for 12- to 14-Year-Olds

WorkSafeBC Approved Injury Claims for 12- to 14-Year-Olds

| Year | Count of disability claims accepted in the year | Disability, fatal benefits charged in the year | Days lost in the year |
|-------|---|--|-----------------------|
| 2007 | 35 | \$69,307 | 446 |
| 2008 | 42 | \$83,887 | 450 |
| 2009 | 18 | \$10,777 | 315 |
| 2010 | 9 | \$33,261 | 801 |
| 2011 | 11 | \$212,185 | 793 |
| Total | 115 | \$409,417 | 2,805 |

Table 6 Source: WorkSafeBC, Response to Information Request, November 2012

WorkSafeBC does not provide statistics on “health-care-only” claims, which are injury claims that do not result in loss of work. None of the 129 youth who participated in this research project had an accepted injury claim, although many had experienced injuries requiring medical attention.

On the day of the release of *What's Happening to Our Children?*, then leader of the Opposition, Carole James, questioned Minister of Labour Coell on why the government had put children at risk. He responded:

“...I can remind the member, though, that when the changes took place in 2003 the age of children able to work did not change. The employment standards did not change, and the occupational safety programs did not change. What changed was a permit system that

wasn't working. Mr. Speaker, a few hundred permits were taken out per year, and government knew that there were literally thousands of young people working.

"What we've done is allow parents and employers to be involved in their children's work, while allowing children to be protected by all of the same protections that are there for all workers..."

"WorkSafeBC has increased regulations. It has increased the number of times they're in schools with programs to talk directly to students. It has a number of programs it has initiated in our term of office that deal directly with employers, telling them what rights they need to look for and how they need to supervise young people who are working for them. WorkSafe is doing an excellent job on protecting young people. They can of course do more, and we will do more.

"...We wanted to make sure that parents and employers had a written agreement if a young person was going to work for them. We have made sure that WorkSafe has enhanced their safety programs for schools, for individuals and for employers in the province, and they'll continue to do that."²¹

When I was 12 I had a job for two weeks at an auto salvage and, I think it was my first day, we were stacking up car batteries and I got battery acid... spilled through my clothes, burning... [Facilitator: and did your... had you been warned about that at all? Did anybody say...?] No. [Did you do heavy lifting or anything in that job?] Oh yeah. [Any training about how to lift things without hurting your back or anything like that?] No. It was very... ok, me and my friend, we were both twelve years old at the time and we had to lift like 70 tires with the rims still in them... car doors, tons of crap... [When you got the battery acid on you, did they send you... did they do first aid on site, did they send you to the hospital?] No. [None of the above?] No, they just said keep working. It was cool though, cause I was getting paid more than I ever did, so I was like whatever. [You have scars?] Yes. [What were you being paid?] Ten bucks an hour.

It is doubtful the Bill 37 changes to employment standards for youth increased the involvement of employers and parents. It simply removed the oversight of the Director of Employment Standards in determining the working conditions of 12- to 14-year-olds, and passively requested parents fill that gap.

Further data from the Adolescent Health Survey (2008) shows that 4 per cent of students who sustained a serious injury in the past year sustained that injury at work. Four per cent of all youth who worked 20 or more hours a week were injured at work, compared to 0.4 per cent of those who worked fewer than 5 hours. Looking only at those who had an injury, 10 per cent of those who worked 20 or more hours in a week were injured at work, compared to 1 per cent of those who worked less than five hours.

This excerpt from the WorkSafeBC website highlights risk factors for young people in the workplace:

WorkSafeBC: Safety at Work

There is a popular misconception that young workers incur many injuries at work because of their risk-taking behaviour and sense of invincibility. Today, researchers believe young workers are more at risk because they lack the experience of their peers, they often work in environments with more hazards, and they frequently engage in more physical work than their older counterparts. Some may not have the training and orientation needed to work safely.²²

A recent study by Curtis Breslin, a leading Canadian researcher in safety and youth behaviour, finds that personal factors like age, gender, and personality (what we normally blame for risk-taking behaviour) are not associated with higher injury rates. In fact, higher injury rates are more directly attributable to job and workplace factors---working with more hazards, perceived work overload, lack of training and supervision.

What We Heard from Young People

Young people’s stories of injuries and safety hazards at work provide some of the most compelling evidence in support of strengthening employment standards including workplace health and safety regulations.

Fifty-four per cent of the participants in our study said that they had never been injured at work, and 3 per cent said they weren’t sure if they had been injured. Forty-three per cent of the respondents reported injuries at the workplace, some multiple injuries. A total of 72 injuries were reported (n=120).

| Young People’s Injuries | |
|---|-----------|
| Burns | 31 |
| Cuts | 18 |
| Falls | 12 |
| Hit by falling object | 4 |
| Muscle strain from heavy lifting | 3 |
| Other | 4 |
| Total number of injuries reported: | 72 |

Table 7, Source: First Call Study

Some of the reported injuries included:

- A one-story fall from scaffolding
- Injuries resulting from a vehicle crash
- A crushed foot
- Numerous cuts from sharp knives and other sharp objects
“all over the place”
- A cut finger that should have been stitched up but did not receive medical attention
- An electric grinder slipping on thin metal cutting through the youth’s glove
- Being hit by a falling object, resulting in bleeding and muscle pain

I got pushed and I burned myself on the deep fryer but I still worked. [Facilitator: So you didn’t get any medical attention or anything?] It was too busy, no one was paying attention so I just had to keep on working. [How bad was the burn?] It was pretty bad... my mom took me to the walk-in [clinic] after and then I quit the next day – well my mom made me quit.

Tara (age 15)

Some of the children and youth shared more detailed experiences that give us a picture of inadequate training and inappropriate responses by employers:

- A child who began working in food services at age 12 received second degree burns at work multiple times. One of these injuries required a three-day absence from work.
- A youth who worked in a warehouse unloading containers was hit by falling objects resulting in a back injury. There was no safety training at his job. The youth visited a doctor and was given a Workers Compensation Board claim number, but he never filed the paper work. He was given one day off from work as a result of the injury, and was on heavy painkillers prescribed by his doctor. He was eventually fired for not working fast enough. He is still in pain from this injury nearly a year later.

- A youth who began working in a restaurant at age 14 reported he received no training to speak of. He had to use bleach and other chemicals at work, but didn't have work gloves so his hands got sore.
- Another youth burned all her fingers at once on a grill. The fingers blistered, but she was told by her employer not to leave to go to the doctor. She also fell down a flight of stairs while moving heavy boxes, and on another occasion slipped and fell on a wet floor.
- One youth reported multiple injuries including: being burned by a pot of coffee; falling during a roofing job; and slipping on a wet floor.

Twenty-nine per cent of participants reported not receiving any training when they started their job, 7 per cent said they weren't sure if they received training, and 63 per cent said they did receive some training. Seventy-four per cent of participants who received training said they felt their training adequately prepared them to do their jobs safely, while 21 per cent said they did not receive adequate training, and 5 per cent said they didn't know if the training was adequate. This means that about half of the participants did not receive adequate (or any) training.

Participants were asked if they had ever been told to do tasks that they thought were unsafe or made them feel uncomfortable (e.g.: working with chemicals, equipment, at heights; feeling fearful about personal safety; experiencing harassment, bullying or discrimination). Sixty per cent of respondents said no, 6 per cent said they didn't know, and 34 per cent said yes.

- Thirteen reported harassment by supervisors and/or co-workers, often of a sexual or racial nature.
- Four reported working in kitchens that made them feel unsafe because of greasy floors or having to use deep fryers.
- One respondent said he had to do a job he wasn't trained for, and another said he was made to work in a store by himself on his third shift when he was only 14.
- Nine youth expressed discomfort with having to work on ladders or at heights, including one who had to use a ladder while pregnant.
- Five described having to do heavy lifting that made them feel unsafe.
- Three youth said they had to work with cleaning chemicals or pesticides that they were uncomfortable with. One of these workers saw her co-workers get nosebleeds from exposure to cleaning chemicals.
- One youth described getting into trouble with her boss for refusing to serve alcohol when she was 16. Another had to move items from a liquor store when underage.

Cara has permanent disabilities in her back and wrists from working with animals when she was 13. She was blamed for her injuries by her employer and was fired. When her mother complained to the employer, she was paid some compensation for the injuries, but Cara did not get her job back and an injury report was never filed. She still has immobilizing pain four years later and avoids using one of her hands.

Five provinces in Canada explicitly ban children (under 16, or in one case under 15) from working in construction, an industry known to be hazardous. As noted in the previous section, nine per cent of participants or 11 individuals had their first jobs in construction. Of these 11, seven started working when they were under 15, and one was under age 12. Nine of these youth reported workplace injuries.

We asked focus group participants what they thought of parents having a role in ensuring their safety in the workplace. Most youth agreed that parents cannot look after safety issues in the workplace. Their comments included:

- Some parents expect their children to work. The interests of parents and children are not always congruent.
- Stupid idea – not reasonable. What’s my mom gonna do, stand there with a bandaid?
- What about kids with no parents?
- Employers don’t like parent involvement – they only want to deal with the worker.
- This is as absurd as expecting parents to keep kids safe in schools.
- What about youth in foster care?
- Lots of parents are working and can’t do this.
- Not all parents are responsible even for themselves, so they can’t take care of kids.
- Employers would never hire someone who came in with their mom.
- The professional relationship should be with the youth hired; some parents re overprotective and inappropriate.

Damian worked in a number of different jobs, including manufacturing and rubbish removal. He often did work that he felt was unsafe, including throwing heavy cinder blocks off of a roof without safety gear, and standing on planter boxes several stories up without fall protection. He had to clear a jammed machine that had caused facial burns and the loss of a fingertip to co-workers, but was not allowed to turn the machine off when it became jammed. Damian and his co-workers worked with a forklift that they were made to load beyond its capacity, and had to stack pallets all the way to the ceiling. Fourteen and 15-year-old co-workers were also driving the forklift without proper training. He received numerous cuts and has a permanent scar from falling off of a truck and not receiving treatment.

Damian also worked alone sweeping wood chips into a pit – which he could have fallen into without anyone knowing. His boss told him not to fall in or he’d be dead. The building had no fire exits or sprinklers. His hands were burned, even though he wore heat resistant gloves. The factory later burned down.



WAGES AND WORKING CONDITIONS

What We Know

It is a given that the children and youth are often paid the lowest wages as they generally have fewer skills and less experience than older workers. Until 2011 employers in BC had the option of paying all workers in a new job a “first job/training wage” of \$6.00 per hour for the first 500 hours of work. In practice this wage was not limited to those in their first job, but was applied as well to workers starting any new job. The government did not track who was receiving the training wage, how many hours the recipients worked below the regular minimum wage, or how many workers were let go and replaced by new “trainees” as soon as they passed the 500 hour threshold.

In 2011, the training wage was eliminated and the regular minimum wage was raised from \$8.00 to \$8.75 per hour and has since gone up to \$10.25.. Some exceptions to the \$10.25 minimum wage remain such as liquor servers, who receive a \$9.00 minimum wage, and crop hand harvesters such as fruit pickers, who are paid by weight or quantity of their harvest.

While government does not track the wages of workers, they did find 53 contraventions involving the payment of wages to workers under the age of 19 over a five-year period ending in 2011. Over the same time period, 890 complaints were made to the Employment Standards Branch regarding wage issues. Complaints only become contraventions if they are not resolved through voluntary settlement.

What We Heard from Young People

A number of the participants in this research worked at different jobs for different wages. We recorded their wages at their first job and/or their current or most recent job.

| Respondents' Wages (Hourly) | First Job (n=101) | Current Job (n=121) |
|-----------------------------|-------------------|---------------------|
| Under \$6.00 | 7% | 3% |
| \$6.00 to less than \$8.00 | 11% | 1% |
| \$8.00 to less than \$9.00 | 33% | 8% |
| \$9.00 to less than \$10.25 | 35% | 37% |
| \$10.25 and over | 15% | 50% |

Table 8, Source: First Call Study

Sixty-three per cent of study participants reported being paid correctly and on time for their hours at work. Of the 29 per cent who said they had not been paid correctly, 18 per cent said they were not paid while they were being trained. The remainder had pay withheld at the end of their jobs, were not paid for overtime hours, or their paycheques were late or bounced. Another eight per cent said that they weren't sure if they had been paid correctly.

Lack of pay while training is a common experience among young workers; employers will ask them to come in for a “try out” shift, or they will be asked to start working as part of the interview for the position. They also reported doing unpaid training at home, using manuals or online orientation sessions.

- Applicants at a coffee shop were required to attend a 3 to 4 hour orientation session where they were observed working for no pay. They were given a meal.
- At a movie theatre, employees had to do online training at home on their own time.
- A grocery store required new cashiers to study product codes at home before being tested.
- A fast food chain had employees do their safety training at home online.

A number of youth reported having to pay for uniforms, and we were told that this was common practice at one fast food restaurant in particular.

The Employment Standards Act states that:

- (1) An employer who requires an employee to wear special clothing must, without charge to the employee,
 - (a) provide the special clothing, and
 - (b) clean and maintain it in a good state of repair, unless the employee is bound by an agreement made under subsection (2).
- (2) If an employer and the majority of the affected employees at a workplace agree that the employees will clean their own special clothing and maintain it in a good state of repair,
 - (a) the agreement binds all employees at that workplace who are required to wear special clothing,
 - (b) the employer must reimburse, in accordance with the agreement, each employee bound by the agreement for the cost of cleaning and maintaining the special clothing, and
 - (c) the employer must retain for 2 years records of the agreement and the amounts reimbursed.
- (3) The following are deemed to be wages owing and this Act applies to their recovery:
 - (a) money received or deducted by an employer from an employee for providing, cleaning or maintaining special clothing;
 - (b) money an employer fails to reimburse under subsection (2).²³

Additionally, the Ministry of Labour's policy interpretation states the following:

...“special clothing” is defined as including “a uniform and a specified brand of clothing”. This means all uniforms and clothing an employer requires an employee to wear while at work to create a certain business image. It is clothing that identifies the employee as part of the employer's business and is usually the same for all employees, or for a group of employees. The definition of special clothing is given a broad interpretation and is not viewed as restrictive by the director.

Some examples of special clothing are:

- a shirt with the employer's logo on it, even though the employee can choose from a selection of shirt styles;
- pants of a particular style produced by a specified manufacturer, even though employees are given a choice of colour;
- a specified brand of clothing made by a particular manufacturer or only available through a supplier specified by the employer (i.e., specifying “Levi's 501 medium stonewash jeans” as opposed to “blue jeans”);
- clothing that employees are required to buy from the employer or from a specific source;
- a tuxedo.

Raymond started working in a restaurant at 16 for \$8 an hour. He worked on statutory holidays, but his employer kept his hours low so he didn't have to be paid the holiday rate. He often didn't get paid on time, and he only got one day off a week. He would be made to work later than he was scheduled to, and he was always the last person to leave.

Soraya started working in an office job at age 14 to earn money to get braces. Her parents did not give permission for her to start the job. She was sometimes sent home early and not paid for the minimum call out time. The company went out of business and she was not paid \$250 in wages owed to her, and she was never paid overtime rates when she earned them.

WorkSafe BC requires workers to provide clothing needed for protection against the elements, general purpose work gloves, appropriate footwear including safety footwear and safety headgear. These items are not considered to be special clothing under the Employment Standards Act. An employer is responsible for providing, at no cost to the employee, all other items of personal protective equipment required by the Occupational Health and Safety Regulation under the Workers Compensation Act.

It is clear from the young people we interviewed that economic exploitation in the workplace can take many different forms, and that young people are often taken advantage of and are not well aware of their rights.

Common problems reported include:

- payment below the required minimum wage;
- withholding of wages, statutory holiday and overtime pay;
- lack of payment for training; and
- charges for uniforms and broken or stolen items.

Further, 19 per cent of respondents said they had been promised a raise, bonus, commission or other payment that they did not receive from their employer. These circumstances indicate that employers do not always have the best interests of their youngest employees in mind.

Finally, we looked at what motivated study participants to go to work and what they spent their earnings on. While the most popular category indicates that youth worked for personal spending money for recreation and entertainment, close to 60 per cent of the responses also indicated money earned went toward savings, the purchasing of necessities including clothing and school supplies, and contributing to family income.

Zara started working for a cleaning company at age 11, saying that she knew her parents couldn't afford to spend money on her.

Kelly worked in a clothing store and her manager told her to get her teeth whitened, which she did, paying \$250 for the service.

She had to buy the newest clothes from the store to wear while working.

She was eventually fired for "not smiling enough."

| How Respondents Spend Earnings (many selected multiple categories) | (N=222) |
|---|---------|
| Contributed to family income, including rent and bills | 6% |
| Personal spending money (i.e. music, movies, electronics, pets) | 41% |
| Purchasing necessities (i.e. clothing, school supplies, food, transportation) | 26% |
| Savings | 28% |

Table 9, Source: First Call Study

THE IMPACTS OF WORK ON EDUCATION

What We Know

Under the previous legislation and permit system, school principals had to give permission for 12- to 14-year-olds to work during the school year. This requirement indicated that government recognized that working might have an impact on education outcomes for adolescents. Under the current legislation, 12- to 14-year-olds are prohibited from working during school hours, cannot work more than four hours on a school day, and cannot work more than 20 hours in a week (in the case of a five day school week). However, there is little indication that employers or students are aware of these rules, and children and youth tend to feel obligated to work when asked. Furthermore, these restrictions on working hours do not apply to students over the age of 14.

The 2004 report *Who's Looking Out for Our Kids*²⁴ cites a study from Statistics Canada on school attachment and working, and discusses potential compromises to a young person's education:

"Students who worked thirty hours or more (per week) were at the highest risk of dropping out." The report also notes that students who did not work at all were 1.5 times more likely to drop out of school. This report reveals that while work experience can be beneficial, the number of hours of work performed by a youth has a direct correlation to academic success. "In summary, the present analysis suggests that working and finishing high school can mix, if done in moderation."

Robyn was in foster care and said she felt she needed to work to be taken seriously by her family. She was depressed, and went to work hoping to find friends. Her foster family didn't give her any money for clothes. With the money she made from working, she bought necessities as well as toys she never had when she was a kid.

As expenditures continue to rise faster than increases in government spending on public education in BC, school boards across the province have had to make tough decisions to cut their budgets. A few districts have already moved to a shortened, four-day school week, and others are considering following suit. A shortened school week will increase the time a young person is away from school and available as a potential employee. With inadequate restrictions on hours of work and no restrictions on types of employment in provincial regulation, children and youth are vulnerable to demands that they work longer hours. This correlates with a greater risk of dropping out of high school and by extension, fewer opportunities to attend post secondary programs.

What We Heard from Young People

Many of the young people we spoke to had difficulty balancing their education and their jobs. In a single focus group with 10 participants, one participant was regularly expected to work during school hours, and three had been urged to skip school for work. Five reported having missed school to go to work.

From this same focus group, eight of the youth said their grades had gone down due to working. Five said their homework was seldom completed, and three said that they fell asleep in class. Another three said they never had a day to catch up on things. Five students said their teachers didn't acknowledge the effects that working had on their education.

Lea is stressed-out by the scheduling at the restaurant where she works. She feels it is definitely affecting her education. She has papers due, but she feels guilty saying no to work. She also feels that she's missing out on a social life.

Of the overall study participants 52 per cent said they did not feel their education had been affected by their job. Twelve per cent of respondents said they didn't know if their education had been affected, and 36 per cent said their education had been affected, primarily in negative ways.

Among those who described how their education had been affected by working, 16 per cent reported dropping out of school due to their work schedule and/or financial need, 19 per cent had missed classes because of work, 46 per cent reported being too tired and/or not having enough time to complete their homework or participate fully at school as a result of working too much, and 19 per cent said that their work experience had a positive effect on their education.

Participants stated:

- They didn't have enough time to do their homework;
- One student was getting up at 7:00 am to go to school, and then working immediately after school until 10:00 pm;
- One youth said she and her sister were working 15 to 40 hours a week while going to school because their single mother couldn't earn enough to support them.

What We Heard from Educators

Sixteen educators participated in this study via an online survey. Educator respondents were asked to share their thoughts about a specific working student. Fifty-six per cent of educators felt the student's education was negatively affected by having a job, often in multiple ways.

| In what way has your student's education been affected by their job? | |
|--|---|
| Fatigue | 9 |
| Extra curricular participation | 7 |
| Tardiness | 4 |
| Mood | 4 |
| Academic effort | 3 |
| Absence | 3 |

Table 10, Source: First Call Study

One educator shared a story of a student who had to support his family due to a parental disability. The educator recalled the student had the best of intentions at school but lacked concentration because he was so stressed out. Another teacher felt that at age 12, students are not emotionally, socially, or physically fit to work; "they do not have enough life skills to work with other adults." Other teachers identified self-esteem issues from verbal abuse at work, and issues with students working late at night.

CURRENT EMPLOYMENT STANDARDS FOR CHILDREN AND YOUTH IN BC

An Employment Standards Branch Fact Sheet on the "General Employment of Young People," sets out the following conditions for employing children under 15:

Employment of young people between the ages of 12 – 14

An employer must receive the written permission of a parent or guardian before employing a young person aged 12 to 14. This enables the parent or guardian to verify where their child will be working, as well as to evaluate whether the hours of work and the type of work to be performed are suitable for their child. Parents and guardians are responsible for determining that the proposed employment meets the best interests of their child and will not adversely affect the child's social, physical or educational needs.

If an employer employs a young person without the consent of a parent or guardian, the employer must be able to prove that the employee is 15 years of age or older.

Employment conditions age 12 – 14

An employer must not require or allow a child aged 12 to 14 to work at the same time the child is scheduled to attend school. The child must be under the direct and immediate supervision of a person aged 19 or older at all times while working.

An employer must not require or allow a child aged 12 to 14 to work more than the following number of hours:

- Four hours on a school day;
- Seven hours on a non-school day, unless the director has provided written approval;
- 20 hours in a week that has five school days; and
- 35 hours in any other week.

Employment of children under the age of 12

Before employing a child under the age of 12, an employer must have written permission in the form of a child employment permit from the Director of Employment Standards.

Employment conditions under age 12

The director will assess each application carefully. Before permission is granted, the employer must demonstrate that:

- The parent or guardian has given written permission;
- The school has given written permission;
- The child will be under direct and immediate adult supervision at all times;
- The child will not travel to or from the worksite unaccompanied; and
- The child will not work near hot surfaces, noxious substances or dangerous equipment.

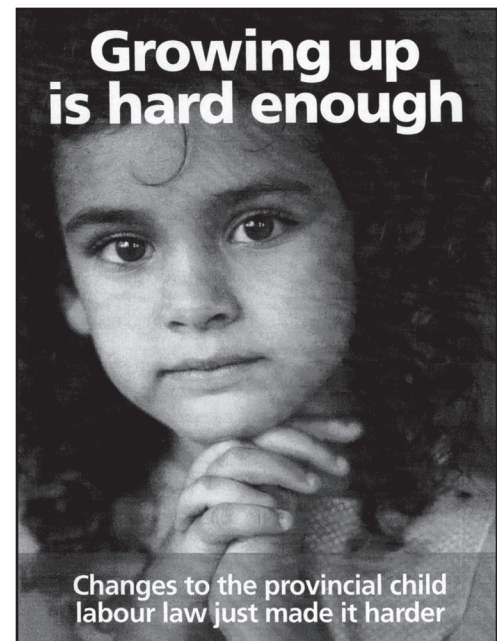
The director will also consider such things as:

- The degree to which the child can physically be expected to perform the work;
- Whether the child has the maturity to function in a work environment; and
- The child's ability to understand the nature of an employment relationship and health and safety issues in the workplace.

The director may set hours of work appropriate for the child, and may restrict the type of work to be performed. If there is any concern about the suitability of the proposed employment, permission will not be granted. The director may cancel a permit after it is issued.

Permission from the director to employ a child does not relieve the employer of responsibility to ensure that the child's work is not dangerous or detrimental to the welfare of the child.²⁵

Unfortunately, when it comes to legislation and policy governing children in the workplace almost nothing has changed in BC since the introduction of Bill 37. Despite the outcry at the outset of the revisions to the Employment Standards Act and continued advocacy and attention brought to the issues by First Call, the Canadian Centre for Policy Alternatives, the labour movement and others, the provincial government has refused to make even the slightest adjustments to employment standards legislation to increase protections for children and youth who work.



British Columbia Teachers' Federation

BC Government Guide for Parents

The guide for parents reproduced in the box below, is a 2008 Employment Standards Branch Factsheet, that outlines the expectations that the BC government now has for parents of children who work.

Employment of Young People - A Guide for Parents:

Under the B.C. Employment Standards Act, children who are 12 or older, but have not yet turned 15, cannot be employed without the written consent of a parent or legal guardian. Children under 12 years of age cannot be employed without a child employment permit issued by the Director of Employment Standards.

The following information and suggestions should assist parents in making a decision whether or not to permit their 12 to 14 year-old child to be employed.

- Meet the prospective employer and discuss the supervision arrangements. The law requires that an employee who is under 15 year of age be under the direct supervision of an adult (19 years or older) at all times while at work.
- Give the employer contact information for you or another responsible adult in case of emergency.
- Show the employer proof of your child's age. The employer may want to make a photocopy for his or her records.
- Ensure that your child will have safe and reliable transportation at all times to and from work and will not be travelling alone in early morning or late evening.
- Ask the employer to describe the specific job duties your child will perform and the hours your child will be expected to work.
- When you visit the workplace where your child will be employed, ensure he or she will not work near obvious hazards such as power tools or sharp implements such as knives or saws, hot grills, deep fryers or boiling water. Ensure he or she will not be exposed to hazardous substances such as chemicals in cleaning agents or other products. Discuss any concerns you have with the employer.
- Ask the employer what tools or equipment your child may be using or have access to and what training may be required.
- Ask the employer what workplace safety training and Workplace Hazardous Materials training your child will receive, and who will be doing the training.
- If any special safety clothing or equipment such as steel-toed boots or latex gloves will be required, consider whether that work environment is appropriate for your child.
- Ask if your child is expected to wear a uniform, and who will be responsible for cleaning and maintaining the uniform.
- Ask for the full name and phone number of the employer's representative to be contacted in the event of illness, or other issues relating to your child's employment.
- Ask if your child will have a comprehensive orientation session so he or she is comfortable in the workplace.
- Ask what wage rate your child will be receiving, what the pay schedule is, and familiarize your child with his or her rights under the Employment Standards Act.
- Ask about work breaks your child will take, such as lunch breaks and whether the breaks are paid.
- Discuss the importance of school with your child, and ask the school to contact you with any concerns that employment is negatively impacting your child's grades or attendance.
- After seeing the workplace and speaking to the employer you should assess whether your child has the necessary maturity or physical ability to follow instructions and perform the assigned tasks.²⁶

This guide assumes:

- Parents will be deciding if, when, and where their children will go to work;
- Parents will meet with the employer have the expertise to provide indirect supervision of their working children;
- Parents have the expertise to ensure their child is not doing work that is inappropriate for their age and abilities;
- Employers will cooperate with parents wanting to visit the workplace, investigate and ask questions;
- Parents have the knowledge and ability to determine the safety of a worksite for their children; and
- Parents have the expertise, time and willingness to research workers' rights covered by the Employment Standards Act and to educate their children accordingly.

In each case the assumption is either false or unrealistic.

It should also be noted that the guide explicitly assumes that children should not be working “near obvious hazards such as power tools or sharp implements such as knives or saws, hot grills, deep fryers or boiling water... [or be] exposed to hazardous substances such as chemicals in cleaning agents or other products,” but, then leaves it up to parents to identify these hazards and regulate the employment of their child. The stories shared by young people in this study who were exposed to these types of hazards routinely when they were under 15 clearly illustrate the failure of a system that relies so much on parent oversight.

Federal Oversight

The Canadian Centre for Occupational Health and Safety (CCOHS) is a federal government corporation tasked with “promoting the total well-being - physical, psychosocial and mental health - of working Canadians by providing information, training, education, management systems and solutions that support health, safety and wellness programs.”

CCOHS takes a view similar to the BC government regarding parental responsibility for their children's occupational safety. The following text is from *Parents... It's Your Responsibility*,²⁷ a document produced by the Canadian Centre for Occupational Health and Safety and posted online.

Accidents and deaths can and do happen to young workers. There have been some well-publicized incidents which demonstrate how important health and safety training and accident prevention can be.

For your child's sake, and your own peace of mind, here are some steps you can take to help ensure their safety:

- TALK to your child about their summer job choices. What types of jobs and workplace options are there?
- FIND out about the nature of your child's tasks.
- TALK to their employer about health and safety policies and training.
- ALERT your child to the dangers of working alone or at night.
- ENCOURAGE your child to ask questions and seek help if they are uncertain about work practices or activities.

Interestingly, on a separate CCOHS webpage in the ‘Young Workers Zone’ under the heading ‘What laws apply to you,’ parents do not have a place under ‘Roles and Responsibilities Under the Law.’ Not mentioning a parental role in this section might seem like an oversight, but it is accurate with respect to the law.

Despite public education campaigns by both provincial and federal authorities over the past decade to convince parents they have a responsibility for their children's worksite safety, there is little evidence that parents perceive this to be their role.

EMPLOYMENT STANDARDS IN OTHER JURISDICTIONS

Canadian provinces and territories are a patchwork of regulation and legislation when it comes to hiring children. While most other provinces have maintained higher child protection standards than BC, some Canadian jurisdictions have followed BC and also weakened their standards.

In the 2008 report *Employment Patterns and Work Injury Experience Among Canadian 12- to 14-Year-Olds*, the authors note:

“In recent years, there has been a trend in Canada towards fewer restrictions on formal employment for 12- to 14- year- olds. In both British Columbia and Alberta, recent legislation places responsibility for deciding the nature and amount of work by 12- to 14 –year- olds on parents and the youth themselves.”²⁸

As noted earlier, the trend toward less formal regulation of employment for 12- to 14- year- olds in Canada is in conflict with the International Labour Organization’s Convention 138 (Concerning Minimum Age for Admission to Employment), which specifies 15 as the minimum work start age and sets the minimum age for admission to light work with added legislated protections at 13.²⁹

Not only have successive Canadian governments refused to ratify ILO Convention 138, they have failed to put in place national legislation establishing minimum child labour standards and protections. As the Canadian Coalition for the Rights of Children has pointed out, the significant variations in child labour laws in different provinces effectively means children and young people are not equally protected in Canada.

Of all the Canadian provinces, BC has the least protective measures for children 12 to 14 years old in the labour force. A number of other jurisdictions provide stronger protections that could be adopted by British Columbia. Children in Canada would benefit from having stronger national standards that set a template for the provinces to follow.

Alberta

Alberta child labour regulations³⁰ are the most similar to BC’s. In 2004, Alberta lowered its work-start age to 12 and, like BC, now requires only parental consent. However – and this is an important difference – Alberta restricts the occupations available to 12, 13, and 14-year-olds (adolescents), and in fact, restricts the occupations and tasks for 15, 16, and 17- year-olds (young persons) as well.

Note that in addition to stipulating the types of jobs in which 12- to 14-year-olds can work, Alberta emphasizes that the employer, not a parent is responsible for ensuring that a job is suitable for a young worker. Within each category of occupation there are also prohibited tasks for 12- to 14- year-olds. Many of these tasks involve the operation of machinery or equipment that pose a greater risk of workplace injuries (e.g.: deep fryers, grills, slicers and other such equipment). The approved occupational categories do not include resource, construction or manufacturing sector jobs – occupations where the most serious injuries to young and older workers alike often occur.

Despite the additional protective legislation, research in Alberta shows that child labour laws are routinely violated, and, like BC, the province does not track the rates of employment of adolescents or survey employer compliance with the regulations described above.

Surveys conducted among 12- to 14-year-olds in Alberta found that 19 percent were working, and 1 in 5 of these were engaged in employment activity that violated the province’s child labour regulations:

Twenty parent-child interviews with employed minors found most minors and their parents were unable to identify basic substantive employment rights and the violations of their rights that they experienced. Further, the majority of those interviewed did not identify filing a complaint with government as a possible remedy. These findings suggest that the requirements for effective complaint-driven compliance (knowledge of a violation generating a complaint) are typically absent and thus complaint-driven regulation is not an effective way to enforce child labour laws.³¹

This research is instructive for BC, which also relies on a complaint-driven system to identify violations of legal protections and employment standards. Protective legislation is necessary to ensure the safety of children in the workforce, but it must be accompanied by resources to ensure the compliance of employers.

Ontario

Ontario has no overall minimum work-start age for children, but rather restricts the work-start age by the type of labour – 14-year-olds can work in offices, stores, arenas, and the serving areas of restaurants; 15-year-olds can work in kitchens, garages, and most types of factories; and 16-year-olds can work in logging, construction, and surface mines. Youth under 18 must not work during school hours. Presumably, this leaves some casual work opportunities, such as delivering newspapers and babysitting, open to children younger than 14 in Ontario. Ontario has no regulations requiring parental permission to work.³²

Quebec

Quebec's lack of specific regulation of young workers doesn't offer a better model for BC. While Quebec does restrict youth from working at night, there is no minimum work start age, and parental permission is required for those under 14 to work. However, the province does state that "no employer may have work performed by a child that is disproportionate to the child's capacity, or that is likely to be detrimental to the child's education, health or physical or moral development."³³

Manitoba

Manitoba's minimum work-start age is 16; younger children require a permit as well as permission from parents and their school principal. Youth under 18 cannot work at night, and are restricted from working in a number of industries.³⁴

Saskatchewan

In Saskatchewan, 14- and 15-year-olds require permission from a parent and must complete the Young Worker Readiness Certificate Course. Under 16's cannot work after 10:00 PM on a school night, and cannot work more than 16 hours in a week when school is in session. Young people under 16 are restricted from working in a number of industries.³⁵

Nova Scotia

In Nova Scotia, children under 14 require a certificate to work more than three hours a day on a school day, and they cannot work at night. Youth under 16 cannot work in mining, manufacturing, construction, forestry, auto service stations, hotels, or billiard rooms unless they are employed by a family member; and if working in a restaurant they cannot operate cooking equipment. While more specific restrictions are named by Nova Scotia than by BC, Nova Scotia warns that the parent of a child whose work violates the province's labour standards can be fined.³⁶

New Brunswick

New Brunswick restricts the employment of youth under the age of 16 by prohibiting work that could be "unwholesome or harmful to the person's health, welfare or moral of physical development." Additionally, youth under 16 cannot work more than six hours a day, or more than three hours on a school day, and they cannot work at night. Further restrictions apply to those under 14; they cannot work in food services and accommodations, or in construction and certain other industries.³⁷

Newfoundland and Labrador

Newfoundland and Labrador requires parental permission for children under 16, and bans them from hazardous work. Children under 14 can only work in occupations specifically prescribed by government regulations. This province also restricts the hours of work for youth, preventing them from working at night.³⁸

Prince Edward Island

In PEI, under 16's are restricted from working at night, and cannot work for more than three hours on a school day. They are also banned from working in construction, and no employer can employ a young person in employment that is likely to be harmful to the health or safety, or moral or physical development of the young person.³⁹

Employment Standards for Children and Youth Comparison by Province

| Province | Minimum work-start age (with permit) | Minimum work-start age (with parental permission) | Work-start age without permit or permission | Age restricted from working at night |
|---------------------------|--|--|---|--------------------------------------|
| British Columbia | Under 12 | 12 | 15 | n/a |
| Alberta | 12 (permit only required for unapproved jobs) | 12 | 15 | Under 15 |
| Saskatchewan | n/a | 14 | 16 | Under 16 |
| Manitoba | 12 | 12 | 16 | Under 18 |
| Ontario | n/a | n/a | 14, in limited occupations only | n/a |
| Quebec | n/a | Under 14 | 14 | Under 18 |
| New Brunswick | Permit required for under 16's to work in industrial jobs, restaurants, and hotels | n/a | 16 | Under 16 |
| Nova Scotia | Permit required for under 14's if working over 3 hours/day, and can only work in limited occupations | n/a | 14, in limited occupations only | Under 14 |
| Prince Edward Island | No work-start age. Under 16's banned from construction | n/a | 16 | Under 16 |
| Newfoundland and Labrador | n/a | 14-15; specific occupations allowed for under 14's | 16 | Under 16 |

Table 11, Source: First Call Study

BC is noteworthy as the only province that does not set out in law or regulation the occupations, tasks or time of day (other than during school hours) for the employment of children.

The International Labour Organization of the United Nations called child labour “a violation of fundamental human rights and has been shown to hinder children’s development, potentially leading to lifelong physical or psychological damage.” Appropriate work experience is an important part of a young person’s development, but the weakening of workplace protections and supports for children, particularly those under the age of 15, means that it is easier for them to work in the wrong jobs and for the wrong reasons.

United States

The situation in the United States has been summarized by the Canadian Coalition for the Rights of Children as follows:

“The United States has more consistent and protective federal legislation which: sets a minimum age for non-agricultural employment at 14, with a few minor exceptions; limits the employment of schoolchildren to three hours a day and 18 hours a week when school is in session; prevents 14 and 15 year olds from working at night; and prohibits children under 18 from performing a wide variety of jobs, with additional restricted occupations for the youngest workers.”⁴⁰

International Standards

The UN Convention on the Rights of the Child, to which Canada and BC are signatories, describes government’s role in protecting children from exploitation and injury in Article 32:

1. States Parties recognize the right of the child to be protected from economic exploitation and from performing any work that is likely to be hazardous or to interfere with the child’s education, or to be harmful to the child’s health or physical, mental, spiritual, moral or social development.
2. States Parties shall take legislative, administrative, social and educational measures to ensure the implementation of the present article. To this end, and having regard to the relevant provisions of other international instruments, States Parties shall in particular:
 - (a) Provide for a minimum age or minimum ages for admission to employment;
 - (b) Provide for appropriate regulation of the hours and conditions of employment;
 - (c) Provide for appropriate penalties or other sanctions to ensure the effective enforcement of the present article.

As evidenced by the severity and number of injury claims and consistent reports of non-compliance with even the minimal standards now in law, BC falls far short of this international, widely-recognized standard to protect children in the workplace. In fact, Canada has been told by a United Nations Committee that it should establish a minimum work-start age of 16, and concern has been expressed about children 16 and under being allowed to perform hazardous work.

As a signatory to the Convention on the Rights of the Child, Canada is required to report on the measures it has adopted to give effect to these rights and the progress made on its compliance with the Convention. The UN Committee on the Rights of the Child recently concluded its consideration of Canada’s third and fourth reports on its implementation of the Convention. The Committee’s concluding observations state:

79. The Committee regrets the lack of information provided in the State party report regarding child labour and exploitation, and notes with concern that data on child labour is not systematically collected in all provinces and territories. The Committee is also concerned that the State party lacks federal legislation establishing the minimum age of employment within the provinces and territories. The Committee also expresses concern that in some provinces and territories, children of 16 years of age are permitted to perform certain types of hazardous and dangerous work.

80. The Committee recommends that the State party:

- (a) Establish a national minimum age of 16 for employment, which is consistent with the age of compulsory education;

- (b) Harmonize province and territory legislation to ensure adequate protection for all children under the age of 18 from hazardous and unsafe working environments;
- (c) Take steps to establish a unified mechanism for systematic data collection on incidences of hazardous child labour and working conditions, disaggregated by age, sex, geographical location and socio-economic background as a form of public accountability for protection of the rights of children; and
- (d) Consider ratifying the ILO Convention No. 138 on the minimum age for admission to employment.

The International Labour Organization’s Minimum Age Convention (Convention 138) sets out the minimum work-start age in Article 2, paragraph 3, as follows:

The minimum age specified in pursuance of paragraph 1 of this Article shall not be less than the age of completion of compulsory schooling and, in any case, shall not be less than 15 years.

Further, Article 3, paragraph 1 of the Convention specifies:

The minimum age for admission to any type of employment or work which by its nature or the circumstances in which it is carried out is likely to jeopardize the health, safety or morals of young persons shall not be less than 18 years.⁴¹

One hundred and fifty-three countries have ratified this convention. The Government of Canada, claiming it does not have jurisdiction over provincially controlled labour laws, is one of 30 countries that has not ratified Convention 138. BC and other provinces are guilty of setting work-start ages below that which is accepted by the international community.

METHODOLOGY

First Call’s research for the BC Child Labour Standards Improvement Project involved a number of methods. Through these methods, we reached a total of 129 youth all of whom had some formal work experience. The majority of youth, 68 out of the 129, participated by completing an on-line survey. In addition, 16 educators responded to an on-line survey. The remaining youth participated through focus groups and individual interviews.

Participants for all of the above methods were recruited through First Call’s networks, including meetings of the coalition, the advisory committee for this project, our website, newsletter, blog, Twitter feed, and the website and Facebook page specific to the campaign on child labour. E-mails and phone calls were directed to community organizations with access to youth audiences, requesting participants to visit nochildlabour.org to complete the online survey or to contact First Call directly about participating in a focus group or interview.

Six focus groups with a total of 56 youth were conducted in BC. Community organizations were enlisted to co-host focus groups and help recruit participants from their local communities.

| Focus Group Location | Supporting Organization |
|----------------------|-------------------------------------|
| Nanaimo | Nanaimo District Community School |
| Kelowna | Okanagan Boys and Girls Club |
| Burnaby | Adoptive Families Association of BC |
| Vancouver | McCreary Centre Society |
| Surrey | Pacific Community Resources Society |
| Prince George | Carrier Sekani Family Services |

Table 12, Source: First Call Study

Five individual interviews were conducted to broaden the diversity of participant experiences included in this project.

The focus groups were conducted with facilitators leading rounds of questions on particular topics. Questions for the focus groups, interviews, and the online survey all focused on the same themes:

1. Overview of work experience
2. Health and safety in the workplace
3. Wages and working conditions
4. Impacts on education

A number of factors were taken into consideration in trying to reach a broad diversity of participants: geographical location, including both urban and rural experiences; newcomer youth, as well as racialized and Aboriginal youth; a balance of gender and ages; diversity of industries the youth were employed in; youth who were both in and out of school; and youth from differing economic backgrounds and family situations, including those in and from government care. While the participants' demographic characteristics other than age and location were not formally recorded, the project was successful in including a good representation of the desired diversity.


Focus group participants and interviewees were each paid a \$50 honorarium for their participation. Youth who responded to the online survey had the option of being entered into a draw to win an iPod Shuffle.

**SOME KIDS GO HOME
AFTER SCHOOL.**

SOME GO TO WORK.

Are you 18 or under?
We want to hear about your work experience.

Visit NoChildLabour.org,
fill out the survey and enter to win prizes.
We want to hear from parents and educators too!

A member of  No Child Labour

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WHAT IS FIRST CALL?

First Call is a cross-sectoral, non-partisan coalition of provincial and regional organizations, engaged communities and individuals whose aim is to raise public awareness and mobilize communities around the importance of public policy and social investments that support the rights and well-being of British Columbia's children, youth and families.

Our coalition partners are committed to the Four Keys to Success for Children and Youth:

A Strong Commitment to Early Childhood Development

- Improve pregnancy outcomes (healthy babies)
- Identify developmental risks early and provide supports
- Support parents of young children
- Build a public system of high quality, affordable, accessible early care and learning

Support in Transitions from Childhood to Youth and Adulthood

- Enhance resiliency and reduce risk
- Increase the success of youth in high school
- Increase the readiness of older youth for adult roles

Increased Economic Equality

- End child and youth poverty
- Reduce the gap between the high- and low-income earners
- Create more living wage jobs

Safe and Caring Communities

- Make each community a better place to live for families with children
- Create youth-friendly spaces and supports
- Build safe, violence-free communities
- Increase opportunities for participation and involvement

First Call is hosted by Family Services of Greater Vancouver and supported by the United Way of the Lower Mainland, the Vancouver Foundation, the Law Foundation, Vancity and contributions from individuals and our coalition partners.

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