

WORKING PAPER 16: HOW TO INCREASE EMPLOYMENT SECURITY FOR IMMIGRANTS AND TEMPORARY FOREIGN WORKERS*†

1. Key challenge & overview

Immigrants and Temporary Foreign Workers are more likely to be in precarious employment than workers who are Canadian born.

Canada's immigration policy system has strong ties to the issue of precarious employment. Those immigrants who come to Canada through 'one-step' immigration are more likely to be in precarious employment the less time they have been in Canada. This is especially true for newcomers who have been in Canada for less than 5 years. Temporary foreign workers who come to Canada through 'two-step' immigration, are inherently precariously employed, and may never have the option of becoming immigrants to Canada. **Thus, policy options focus on supporting immigrants and temporary foreign workers in order to increase their employment security, which will then impact their wellbeing and security outside of the workplace as well.**

2. Policy problem

PEPSO's *It's More than Poverty* report[‡] found that those not born in Canada are more likely to be in precarious employment than the Canadian born. This is especially true for newcomers – immigrants who have been in Canada for less than five years. It is only after 20 years that immigrants are as likely as non-immigrants to be in a secure employment relationship. This means immigrants are disproportionately affected by the challenges associated with precarious employment. These challenges affect household wellbeing and compound the stress of moving to and settling in a new country.

In addition to immigrants, temporary foreign workers – those individuals who are neither Canadian-born nor considered immigrants – are especially vulnerable to precarious employment. These workers' legal status makes their employment precarious, as their work ties them to their employer. In addition, since 2006, the number of people entering the country on temporary work permits has consistently exceeded the number of people entering the country with permanent residency.^{§ 1} Thus, the number of immigrants in precarious employment is growing in Canada.

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† This Policy Options Working Paper is one in a series of 16 working papers that explore the range of policy options that have been proposed to reduce or mitigate the impacts of precarious employment. Each of these papers must be read in tandem with the paper titled "PEPSO Policy Options Working Papers: Introduction". The full reference list is contained in a separate bibliography document.

‡ PEPSO's *It's More than Poverty* report refers to the report that was published in February 2013 that was based on the main survey conducted by PEPSO. In these working papers this report will be called the PEPSO report or the PEPSO survey. This is only appropriate for these working papers as there are other PEPSO reports that will be published by the six case studies.

§ The precarity of migrant workers was not a focus in this PEPSO report, but it is taken up by a PEPSO case study, and is therefore included in this chapter.

3. Context/current situation

The federal government and the provinces share jurisdiction over immigration, though the federal government determines the legislative framework through the *Immigration and Refugee Protection Act (IRPA)*.^{**} Traditionally, Canada often used a one-step immigration process, but increasingly the federal government is using a two-step process that involves temporary migration to Canada through a work permit, student visa, or refugee claim. Once here, the opportunity to apply for permanent residency is open to international students and temporary workers whose occupation is classified as “high” skill.

The National Occupational Classification (NOC) system describes and classifies jobs in Canada. One of its uses is to determine access to the different migration streams. Skilled occupations are those with an NOC 0, A or B classification, while NOC C or D classifications describe “low” skill jobs.

Applicants in NOC 0, A and B occupations may be eligible for permanent residency. Those with “low skill” designations are not eligible and can only come to Ontario as temporary workers. Live-in caregivers are the only exception and can apply for permanent residency once they’ve fulfilled a length of service requirement.

3.1 One-step immigration

Newcomers can become permanent residents and potentially citizens through the following one-step processes: Economic Class, Family Class and Protected Persons. Most immigrants arrive in Canada under the Economic Class; this category includes both the principal applicant and their spouses and dependents.²

The **Economic Class** has three programs that admit immigrants for permanent residence.

- **The Federal Skilled Worker Program (FSWP)** is limited to applicants with a job offer, or work experience in high demand NOC 0, A or B occupations.
- **The Business Investor Program** currently accepts applications from those who want to start a business in Canada.
- **The Provincial Nominee Program (PNP)** allows provinces to nominate applicants for permanent residence. In Ontario, only those with offers of permanent NOC 0, A or B occupations are eligible. Workers can be recruited outside the country (one-step immigration) or from within (two-step immigration when the applicant is already in the country on a temporary work or study permit).

Immigrants in the **Family Class** are sponsored spouses, common-law partners and dependent children^{††} brought to Canada by permanent residents and citizens. **Refugees** from outside the country may be brought to Canada through government or private sponsorship. People who successfully file refugee claims from within Canada are also granted permanent residency.

Ontario receives the highest percentage of immigrants in the country, though the relative proportion has dropped. In 2001, six in ten immigrants to Canada settled in Ontario, whereas in 2010 and 2011, it was four in ten.³ Between 2001 and 2006, 40% of all immigrants to Canada settled in the Toronto Census Metropolitan Area.⁴

^{**} IRPA came into effect in 2002 and replaced the Immigration Act, 1976. Government of Ontario, 2006

^{††} The Parent and Grandparent category for Family Class immigration re-opened January 2, 2014 but quickly reached its cap of 5,000 applications and closed again by February 4, 2014. Government of Canada, 2014c

3.1.1 Labour market challenges

Those immigrants who have come to Canada more recently have experienced more economic and labour market challenges.^{††} Immigrants and those born in Canada have similar participation rates in the labour market but unemployment rates are higher for immigrants than for the Canadian born, regardless of educational attainment.⁵ In addition, immigrants are more likely to earn less than the Canadian born.⁶ Internationally trained immigrants who arrive in Canada without a job offer often report that employer demand for “**Canadian experience**” is the number one barrier to meaningful employment.⁷ The Ontario Human Rights Commission released a report in 2013 that describes the arbitrary use of Canadian experience in hiring practices as “prima facie” discrimination.^{§§} The Commission’s report proposes strict guidelines for its appropriate use as a prerequisite for employment.

Underemployment or unemployment among immigrants is partially attributed to the fact that the **credentials** of internationally trained immigrants are often **not recognized** as equivalent to credentials gained in Canada. Immigrants who completed their highest degree outside of Canada are less likely to find work in their field of education than immigrants whose highest degree was earned in Canada.⁸ Recognizing the economic loss this represents, the federal and provincial governments have developed initiatives to try to address these challenges.

- In 2007, the Government of Canada launched the **Canadian Immigrant Integration Program (CIP)**. It offers pre-arrival orientation workshops, and can connect immigrants to employers and settlement services before they arrive in the country.
- Qualification recognition of immigrants is under provincial jurisdiction, but is often delegated, through legislation, to professional or regulatory bodies. These bodies are making “incremental but slow” progress to improve their accreditation processes.⁹ In 2009, federal-provincial-territorial ministers approved the **Pan-Canadian Framework for the Assessment and Recognition of Foreign Credentials** that charts a path to improve the recognition of international credentials, particularly for regulated professions.

3.2 Two-step immigration

Another way government is addressing the underemployment and unemployment of immigrants is by changing the way in which they enter the country.¹⁰ In Ontario, the Provincial Nominee and Temporary Foreign Worker programs offer the opportunity to transition to permanent residency for higher-skilled workers, but no pathway to permanency exists for most workers in low-skilled jobs, with the exception of live-in caregivers. In 2010, transitions of TFWP workers from temporary to permanent status accounted for 30% of all transitions to permanent residency,^{***} with live-in caregivers accounting for the bulk of these.¹¹ Regulations that began last year limit temporary foreign workers from being in Canada for more than four years consecutively, and prohibit them from returning to Canada until four years has elapsed.¹²

The **Temporary Foreign Worker Program (TFWP)** has been in existence for 40 years and originally was used to recruit skilled workers for specialized sectors, such as academia or entertainment.¹³ In 2008, The Canadian Experience Class (CEC) program was introduced to allow migrant workers in NOC 0, A or B occupations and international students currently living and working in Canada to apply for permanent residence.

^{††} It is worth noting that though the literature reviewed for this chapter did not differentiate between the labour market outcomes of the various immigrant streams, there was a strong focus on the challenges faced by skilled and educated immigrants.

^{§§} While the majority of immigrants to Canada now come from Asia, with China and India as the main sending countries,^{§§} discrimination is not an ‘immigration problem’ per se. Second, third, fourth generation Canadians with ancestry in the Global South, as well as women, Canadian Aboriginal and First Nations also experience **discrimination in the labour market**. PEPSO’s report found that racialized workers were more likely to be found in the precarious cluster, and while this group includes immigrants, they do not make up the entirety of this group. Racism and other forms of discrimination will be taken up in a separate chapter.

^{***} International students, refugee claimants, spouses and children of citizens can apply for open work permits while in Canada, and may also have access to permanency. (Maytree Foundation, 2012; Citizenship and Immigration Canada, 2012)

The TFWP has four streams for lower-skilled migrant workers.

- **The Seasonal Agricultural Workers Program (SAWP)** is the oldest migrant worker program, recruiting agricultural workers from Mexico and Caribbean countries for up to eight months at a time. The program is structured as a bi-lateral agreement between governments of sending countries and the federal government of Canada.
- **The Live-in Caregivers Program (LCP)** is the only program that allows workers classified as low skill to apply for permanent residency after 3900 hours, or 24 months, of full-time work.^{†††}
- **The NOC C&D Pilot Project** started in 2002. It allows employers to recruit workers for up to 24 months at a time. Permits restrict workers to a specific job and specific employer. In 2009, the federal government introduced a four-year residency cap, after which workers must leave the country for four years.¹⁴
- **The Agricultural Stream of the NOC C & D Pilot Project** permits employers to hire farm workers for up to 24 months. There are no restrictions on the source country and in Ontario, there has been an increase in the number of agricultural workers arriving from non-SAWP countries.¹⁵

Farm workers have been coming to Canada since the 1960s and about 70% to 80% of them are rehired by the same employer every year.¹⁶ Since the 1990s, employers have been using the TFWP to recruit a much broader range of workers, with growth concentrated in lower-skilled occupations in the construction, retail, food services, transportation and warehousing sectors.¹⁷ Some argue that migrant workers arriving through the two NOC Pilot Project streams are particularly vulnerable to exploitation and standards' violations because these programs have the least amount of government oversight.¹⁸

3.2.1 Non-status workers

There are many ways a person may end up living and working in Canada without status. Unlike in the U.S., most non-status residents and workers entered Canada legally, and for any number of reasons eventually find themselves without status.¹⁹ Challenging economic conditions in a migrant's home country, coupled with restrictive immigration policy in Canada mean the incentive to fall out of status and remain working in Canada can be strong. Non-status workers also face heightened vulnerability and fear discovery and deportation.

3.2.2 Labour market challenges

While granting permanent residence to those already living and working in Canada improves labour market metrics for immigrants, the impact of the two-step immigration process on longer-term social and political integration is unknown.²⁰ This could be because migrant workers do not have access to federally funded settlement services and many migrate without their family members.²¹ Thus their initial settlement process may be markedly different from those who immigrate through the one-step process.²²

Each stream for lower skilled migrant workers has different terms and conditions of employment. The terms of their migration subject all of these workers to legal restrictions on their right to be in Canada and on their mobility in the labour market. In this way, immigration policy can contribute to the heightened employment precarity and social vulnerability experienced by migrant workers.

Most, but not all, migrant workers^{†††} are protected through employment standards legislation, but these protections and entitlements are not always realized. **Fear of repatriation** effectively silences many workers, and mechanisms to

^{†††} CIC reported that in 2009, 90% of LCP participants applied for permanent residency and 98% of these applications were successful. (Metcalf Foundation, 2012)

^{†††} For example: farm workers are exempt from ESA protections that stipulate hours of work, rest and meal periods, time off between shifts, statutory holiday and overtime pay. (Ministry of Labour, 2011b) These terms and conditions are included in their employment contracts which often offer fewer protections or benefits than what is provided in the ESA: SAWP workers get 2 ten minute breaks in a day, and a 30 minute meal break after 5 hours of work. (North South Institute, 2006)

challenge reprisals if workers do speak up are not easy to access. Language barriers and a lack of familiarity with legislation also hinder migrant workers' **access to employment standards protection**.²³ **Occupational health and safety**, particularly for agricultural workers, has also been a long-standing concern for migrant workers and advocates.²⁴ The employment standards complaints process requires workers to first approach employers to try and resolve the issue, which may endanger their ability to access future work. Limited **access to health care and benefits**, or to compensation in case of injury, compounds workplace safety concerns for migrant workers. Finally, migrant workers are not able to unionize in Ontario.²⁵

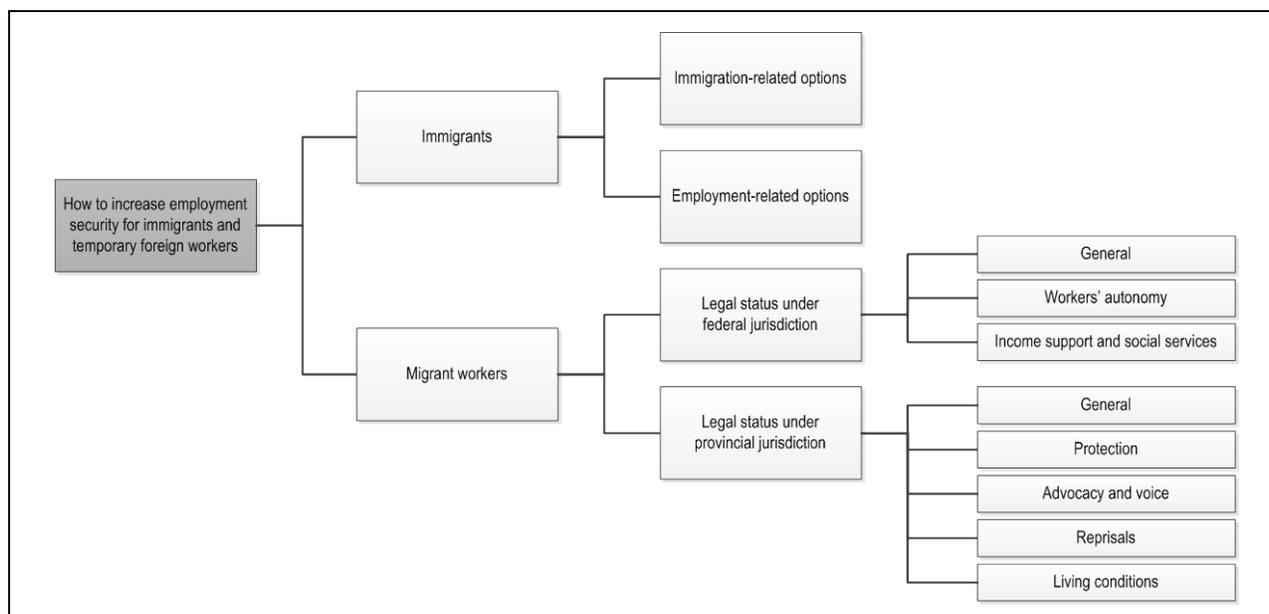
3.2.3 Bill 146, Stronger Workplaces for a Stronger Economy Act, 2013

On December 4, 2013, the government of Ontario announced The *Stronger Workplaces for a Stronger Economy Act, 2013*. This new bill proposes changes that would strengthen protection of migrant workers by expanding coverage of the Employment Protection for Foreign Nationals Act, 2009 (EPFNA) from live-in caregivers to all migrant workers. The EPFNA prohibits employers and recruiters from keeping workers' documents or property, charging or recovering fees, and threatening reprisal actions.^{§§§} As of mid-April 2014, this bill is at second reading.²⁶

4. Policy options

Challenges faced by immigrants and migrant workers in the Canadian labour market can be addressed through action in two policy spheres: immigration and employment. **Some policy options seek to change immigration processes to improve the labour market position** of immigrants and migrant workers. **Other policy options seek to reduce barriers to the labour market and improve employment conditions** for immigrants and migrant workers once they are in Canada.

General, high level policy options focus on questioning the underpinnings of immigration policy. While economic considerations have always shaped immigration policy, concerns have been raised that the program is increasingly oriented towards meeting short-term labour market needs at the expense of a longer term economic, social and cultural vision for the country.²⁷ Some policy options address this directly, and suggest the need for reflection and discussion on how immigration contributes to nation building.²⁸



§§§ In October, 2013, Saskatchewan passed its own bill, *The Foreign Worker Recruitment and Immigrant Services Act* that also offers wide ranging protection to migrant workers. (Star-Phoenix, 2013)

4.1 Immigrants

Immigration-related policy options suggest ways to manage immigration flows in order to produce better labour market outcomes for immigrants by:

- **Targeting recruitment** for age,²⁹ for language ability,³⁰ for skills in high demand areas of the labour market.³¹
- **Matching immigration levels** to labour market demand and economic growth.³²
- **Increasing PNP quotas** to ensure that skilled immigrants arrive in Ontario to a permanent job.³³

Employment-related policy options suggest ways to improve the labour market recognition of immigrants' skills, training and experience. They include:

- **Identifying and removing barriers to accreditation**³⁴ through continued collaboration between government and regulatory bodies.³⁵
- **Re-positioning regulatory bodies and professional associations** to actively support and create opportunities for immigrants.³⁶ Establishing an appeals process to **increase transparency and accountability** in the licensing and accreditation process.³⁷
- **Developing support services** for immigrants undertaking (re) certification,³⁸ such as loan programs,^{****} and **facilitating access** to training, mentorships and internships.³⁹
- **Assisting immigrant families to negotiate** for better benefits, job security, and protections, which could be done by service providers.⁴⁰
- Developing a **joint labour market strategy** between Citizenship and Immigration Canada and Employment and Social Development Canada.⁴¹
- **Increasing awareness among employers** of the benefit of hiring internationally trained workers.⁴² Increasing employers' access to skilled immigrants by **creating a searchable database** with the resumes of immigrant applicants.⁴³

4.2 Migrant workers

The vast majority of the literature and recommendations that address the precarity of migrant workers focuses on programs that recruit workers for "low skill" work. A recurring theme across much of the literature was the importance of **providing language appropriate support** and information to migrant workers. This could include access to employment-related information, community services and benefits in their first language.⁴⁴

4.2.1 Legal status under federal jurisdiction

At the federal level, Employment and Social Development Canada (ESDC), Citizenship and Immigration (CIC), and the Canada Border Services Agency (CBSA) share the administration of the TFWP. These departments determine the terms and conditions of the work permits and employment contracts issued to migrant workers. **Many immigration-related policy options address the insecure legal status** of migrant workers in order to reduce their precarity. These proposals include:

- **Re-focusing on permanent migration**⁴⁵ by capping the number of workers admitted through the TFWP,⁴⁶ or adapting the fee structure to discourage employers from repeated use⁴⁷ in order to scale back the TFWP.⁴⁸ Eliminating the Low Skill Pilot Projects,⁴⁹ or creating a pathway to permanency for lower-skilled

**** Maytree Foundation used to offer the Immigrant Education Loan. Currently, financial institutions appear to be the only source of financial support for immigrants while they get certified or licensed. (Teelucksingh & Galabuzi, 2005)

migrant workers and their immediate family.⁵⁰ Granting permanent residency to live-in caregivers upon arrival in Canada.⁵¹ Re-focusing the program on highly skilled workers,⁵² or truly temporary job openings.⁵³

- **Reversing the four-year rule** for Low-Skilled Pilot Project workers,⁵⁴ or removing the categories that differentiate low from high skilled workers.⁵⁵
- **Increasing awareness** about the process, frequency, and threat of **repatriation**⁺⁺⁺⁺ to encourage workers to report violations.⁵⁶
- **Implementing a regularization program** that will grant non-status workers legal status.⁵⁷

Other policy options seek to increase workers' autonomy by:

- **Improving the terms of employment** by including workers, or their representatives, in the development of employment contracts,⁵⁸ or removing the requirement that workers live with their employers.⁵⁹ Ensuring that workers receive a minimum of rest and breaks, protection from unlawful wage clawbacks and equal pay to non-migrant workers,⁶⁰ or adopting a wage scale that recognizes experience and skills of returning farm workers.⁶¹
- **Reducing restrictions on workers' mobility** by issuing sector-based work permits⁶² so workers can perform alternate work if they are injured,⁶³ or find another job and pursue standards' violations.⁶⁴ Reviewing housing terms that restrict workers' mobility.⁶⁵
- Allowing migrant workers to enroll in training or education courses,⁶⁶ or **abolishing the "naming process" (whereby growers name who they choose as workers)** for SAWP and replacing it with a right to recall.⁶⁷

Legal status can mediate a migrant worker's access to benefits and services in a number of ways. It can be a precondition to access services: federally funded settlement services, for example, are only available to permanent residents.⁶⁸ **Policy options also explore ways to facilitate migrant workers' access to income support and social services** by:

- **Funding employment services** to match employers with migrant workers already in the country.⁶⁹
- **Guaranteeing access to health insurance** and compensation in the event of a work-related injury or death,⁷⁰ ensuring live-in caregivers have access to social and health benefits.⁷¹
- **Ensuring access to full Employment Insurance** benefits,⁷² or re-directing migrant workers' EI premiums to a Migrant Workers' Fund that would help them establish businesses in their home countries.⁷³
- **Offering publicly funded settlement services** to migrant workers.⁷⁴ Expanding the legal, medical, social and cultural supports offered in community settings.⁷⁵
- Establishing **mobile-medical clinics** that offer healthcare.⁷⁶

4.2.2 Legal status under provincial jurisdiction

Though the terms of the employment contract for migrant workers are determined at the federal level, the enforcement of these terms is the jurisdiction of the province. Two policy options **address this jurisdictional disconnect** directly. Designating the LCP and SAWP as federally regulated "industries" would transfer protection of these workers to the federal government under the Canada Labour Code.⁷⁷ Another idea is to improve the coordination of policies and information-sharing between the federal and provincial governments.⁷⁸

Some employment-related policy options focus on improving protection for migrant workers within existing provincial legislation and standards. They include:

⁺⁺⁺⁺ The fear of repatriation is frequently identified as the primary reason migrant workers do not report rights violations. Repatriation is infrequently used, however, and for seasonal agricultural workers, there is a bit of a dispute resolution mechanism that offers workers some protection against reprisal repatriation. (Law Commission of Ontario, 2012)

- **Ensuring rigorous enforcement** of employment, health and safety standards by allowing anonymous, or third-party complaints, to trigger an inspection,⁷⁹ targeting workplaces that employ migrant workers for inspection,⁸⁰ increasing funding for workplace inspections,⁸¹ or increasing the use of proactive enforcement techniques.⁸² Incorporating worker and employer education into the inspection process, particularly for workplaces that are known to violate standards.⁸³
- **Exploring whether basic rights and hazard training** can be provided to migrant workers before arrival.⁸⁴
- **Preventing employers** from hiring more migrant workers until they are compliant with standards,⁸⁵ or levying higher penalties and fines.⁸⁶
- Ensuring that SAWP workers are covered by the ESA.⁸⁷

Other policy proposals seek to increase opportunities for advocacy and worker voice by:

- Creating an **Office of the Migrant Worker Advocate** to increase support and information for migrant workers,⁸⁸ developing partnerships with organizations engaged with migrant worker issues,⁸⁹ ensuring migrant workers have a say on how to control hazards in the workplace.⁹⁰
- **Amending labour relations legislation** to ensure migrant workers have the right to unionize and bargain collectively.⁹¹
- **Granting political and economic rights** to non-status workers in order to support the development of a collective voice.⁹²
- Using mobile-medical clinics to help workers file claims.⁹³
- Offering **dispute resolution support** to migrant workers and employers.⁹⁴

Another set of policy options explores ways to protect individuals from reprisals to encourage reporting of employment standards violations. They include:

- **Ensuring the adjudication of reprisal claims** prior to repatriation.⁹⁵
- **Protecting the identities** of non-status workers who file employment-related claims when sharing information with federal departments.⁹⁶
- **Extending the time limit** for live-in caregivers to file grievances against recruiters.⁹⁷

Housing conditions and inconsistent use of farm rules are two other challenges for migrant workers. Housing conditions and the setting of site-specific rules⁹⁸ for workers are within employers' control. **Policy options explore ways to ensure that living conditions are adequate and fair.** They include:

- **Improving housing conditions for migrant workers** by allowing for more privacy and autonomy,⁹⁹ including minimum housing conditions in employment standards,¹⁰⁰ monitoring conditions using multi-sectoral compliance teams.¹⁰¹
- **Standardizing farm rules** to ensure that workers are not subject to unnecessary restrictions on their movements or social lives.¹⁰²

5. Questions for discussion

1. Which policy options in this paper could have the most impact on the lives of those in precarious employment?
2. Which policy options in this paper can we realistically move forward on, given the current political, economic, and social climates?
3. Which policy options are missing from this paper, but require attention?

6. Endnotes

- ¹ Metcalf Foundation, 2012; Canadian Centre for Policy Alternatives, 2010a
- ² Metcalf Foundation, 2012
- ³ Statistics Canada, 2013c
- ⁴ City of Toronto, 2013a
- ⁵ Toronto Immigrant Employment Data Initiative, 2011
- ⁶ Statistics Canada, 2012b
- ⁷ Statistics Canada, 2003 in Ontario Human Rights Commission, 2013
- ⁸ Toronto Immigrant Employment Data Initiative, 2010
- ⁹ Maytree Foundation, 2012
- ¹⁰ Canadian Centre for Policy Alternatives, 2010a; Valiani, 2009
- ¹¹ Citizenship and Immigration Canada, 2012
- ¹² Government of Canada, 2013d
- ¹³ Foster, 2012; Nakache, 2013
- ¹⁴ Foster, 2012
- ¹⁵ Metcalf Foundation, 2012
- ¹⁶ Metcalf Foundation, 2012
- ¹⁷ Metcalf Foundation, 2012; Foster, 2012
- ¹⁸ Metcalf Foundation, 2012
- ¹⁹ Parliament of Canada, 2009
- ²⁰ Maytree Foundation, 2012
- ²¹ Maytree Foundation, 2012
- ²² Maytree Foundation, 2012; Valiani, 2009
- ²³ Nakache, 2013
- ²⁴ West Coast Domestic Workers' Association, 2013
- ²⁵ UFCW, 2014
- ²⁶ Legislative Assembly of Ontario, 2014
- ²⁷ Maytree Foundation, 2012
- ²⁸ Maytree Foundation, 2009b
- ²⁹ Institute for Research on Public Policy, 2012
- ³⁰ Maytree Foundation, 2009b; Institute for Research on Public Policy, 2012
- ³¹ Institute for Research on Public Policy, 2012; Maytree Foundation, 2009b
- ³² Institute for Research on Public Policy, 2012
- ³³ Institute for Research on Public Policy, 2012; Perspectives, 2013
- ³⁴ Access Alliance, 2011 with endorsement by Office of the Fairness Commissioner, Region of Peel, Colour of Change; Institute for Competitiveness and Prosperity & Martin Prosperity Institute, 2013; Colour of Poverty, 2013; Wellesley Institute, 2011b; NDP, 2013; Mwebi, 2012; PEPSO, 2013
- ³⁵ PEPSO, 2013; Teeklucksingh & Galabuzi, 2005; NDP, 2013; Council of Agencies Serving South Asians, 2009
- ³⁶ Teeklucksingh & Galabuzi, 2005; Access Alliance, 2011 with endorsement from the Office of the Fairness Commissioner, Region of Peel and Colour of Change
- ³⁷ Teeklucksingh & Galabuzi, 2005; De Wolff, 2006
- ³⁸ Institute for Competitiveness and Prosperity & Martin Prosperity Institute, 2013; Access Alliance, 2011; Wellesley Institute, 2011b
- ³⁹ PEPSO, 2013; Cities of Migration, 2013b
- ⁴⁰ Access Alliance, 2013
- ⁴¹ DeWolff, 2006
- ⁴² Council of Agencies Serving South Asians, 2009
- ⁴³ Maytree Foundation, 2009b
- ⁴⁴ Arthurs (Human Resources and Skills Development Canada), 2006; Metcalf Foundation, 2012; Canadian Centre for Policy Alternatives, 2013; North South Institute, 2006
- ⁴⁵ Goldring & Landolt, 2012
- ⁴⁶ Institute for Research on Public Policy, 2013
- ⁴⁷ Institute for Research on Public Policy, 2013; Martin, 2006

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- ⁴⁸ Canadian Centre for Policy Alternatives, 2013
- ⁴⁹ Maytree Foundation, 2012
- ⁵⁰ West Coast Domestic Workers' Association, 2013; Wellesley Institute, 2011a; Carpentier & Fiset (Quebec Commission des droits de la personne et des droits de la jeunesse), 2011; NDP, 2013; Canadian Centre for Policy Alternatives, 2013; Workers' Action Centre & Employment Standards Work Group, 2005; Metcalf Foundation, 2012; Toronto Star, 2013c
- ⁵¹ West Coast Domestic Workers' Association, 2013
- ⁵² Global News, 2013a
- ⁵³ Perspectives, 2013
- ⁵⁴ Wellesley Institute, 2013b
- ⁵⁵ West Coast Domestic Workers' Association, 2013
- ⁵⁶ Law Commission of Ontario, 2012
- ⁵⁷ Wellesley Institute, 2011a; NDP, 2013; Martin, 2006
- ⁵⁸ Metcalf Foundation, 2012
- ⁵⁹ Carpentier & Fiset (Quebec Commission des droits de la personne et des droits de la jeunesse), 2011; West Coast Domestic Workers' Association, 2013; Workers' Action Centre & Employment Standards Work Group, 2005
- ⁶⁰ Arthurs (Human Resources and Skills Development Canada), 2006; North South Institute, 2006
- ⁶¹ North South Institute, 2006
- ⁶² Goldring & Landolt, 2012
- ⁶³ Carpentier & Fiset (Quebec Commission des droits de la personne et des droits de la jeunesse), 2011; West Coast Domestic Workers' Association, 2013; Metcalf Foundation, 2012
- ⁶⁴ Law Commission of Ontario, 2012
- ⁶⁵ NDP, 2013
- ⁶⁶ Metcalf Foundation, 2012
- ⁶⁷ West Coast Domestic Workers' Association, 2013
- ⁶⁸ Maytree Foundation, 2012
- ⁶⁹ Law Commission of Ontario, 2012; West Coast Domestic Workers' Association, 2013
- ⁷⁰ Toronto Star, 2013c; Slaw, 2013
- ⁷¹ Workers' Action Centre & Employment Standards Work Group, 2005
- ⁷² Mowat, 2011; Metcalf Foundation, 2012
- ⁷³ North South Institute, 2006
- ⁷⁴ West Coast Domestic Workers' Association, 2013; Goldring & Landolt, 2012; Law Commission of Ontario, 2012
- ⁷⁵ Law Commission of Ontario, 2012; North South Institute, 2006
- ⁷⁶ Law Commission of Ontario, 2012
- ⁷⁷ Workers' Action Centre & Employment Standards Work Group, 2005
- ⁷⁸ Law Commission of Ontario, 2012; Institute for Research on Public Policy, 2013; Arthurs (Human Resources and Skills Development Canada), 2006
- ⁷⁹ Metcalf Foundation, 2012
- ⁸⁰ Law Commission of Ontario, 2012; North South Institute, 2006; Tucker, 2006
- ⁸¹ Canadian Centre for Policy Alternatives, 2013; NDP, 2013; Wellesley Institute, 2011a, Metcalf Foundation, 2012; Maytree Foundation, 2009b; Institute for Research on Public Policy, 2013
- ⁸² Metcalf Foundation, 2012; Wellesley Institute, 2011a
- ⁸³ Workers' Action Centre & Employment Standards Work Group, 2005
- ⁸⁴ Law Commission of Ontario, 2012
- ⁸⁵ West Coast Domestic Workers' Association, 2013
- ⁸⁶ Wellesley Institute, 2011a
- ⁸⁷ NDP, 2013
- ⁸⁸ Metcalf Foundation, 2012
- ⁸⁹ Metcalf Foundation, 2012
- ⁹⁰ Dean (Ontario Ministry of Labour), 2010
- ⁹¹ Metcalf Foundation, 2012; West Coast Domestic Workers' Association, 2013; Tucker, 2006
- ⁹² Standing, 2011
- ⁹³ Law Commission of Ontario, 2012
- ⁹⁴ Law Commission of Ontario, 2012

⁹⁵ Law Commission of Ontario, 2012; Metcalf Foundation, 2012; Arthurs (Human Resources and Skills Development Canada), 2006; Carpentier & Fiset (Quebec Commission des droits de la personne et des droits de la jeunesse), 2011; North South Institute, 2006

⁹⁶ Workers' Action Centre & Employment Standards Work Group, 2005

⁹⁷ Metcalf Foundation, 2012

⁹⁸ North South Institute, 2006

⁹⁹ North South Institute, 2006

¹⁰⁰ Carpentier & Fiset (Quebec Commission des droits de la personne et des droits de la jeunesse), 2011

¹⁰¹ West Coast Domestic Workers' Association, 2013

¹⁰² North South Institute, 2006