



COUNCIL OF ONTARIO
CONSTRUCTION ASSOCIATIONS

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A Modern Skilled Trades and Apprenticeship System

**A submission to the
Ministry of Training, Colleges and Universities**

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1. Introduction

The Council of Ontario Construction Associations (COCA) is a federation of 30 construction associations which represents 10,000 general contractors and trade contractors that operate in all regions of the province in the industrial, commercial and institutional (ICI) segment of the construction industry. Our membership includes construction enterprises of all sizes and that are both unionized and non-union. COCA is the largest, most diverse and most representative voice for the non-residential construction sector in Ontario.

From its inception, the Ontario College of Trades (OCoT) was highly controversial, particularly in the construction industry. Because half of our member associations supported the creation of OCoT and half were opposed, COCA never took a position either in support of or opposed to OCoT. COCA's role has always been to serve as a watchdog over the activities of OCoT and to keep our members well informed. That being said, many individuals associated with COCA, some supportive and some very strongly opposed to OCoT, chose to seek positions on OCoT's governance framework, to help shape the province's skilled trades and apprenticeship system to address the needs of our industry. This participation gave COCA a pretty good window into the workings of OCoT.

As the government has taken steps to disband OCoT and replace it with a modern, effective and efficient skilled trades and apprenticeship system, we are pleased to provide our advice with regard to the issues identified by the Minister Fullerton's Office as those of greatest interest in the development of the new system.

2. Governance Framework for the New Skilled Trades and Apprenticeship System

The members of COCA have no preference whether the oversight and administrative support for the new skilled trades and apprenticeship system resides in a special office within the Ministry of Training Colleges and Universities or outside of the Ministry in a newly constituted organization. However, if the new system is positioned inside MTCU, it should reside in a specially designated unit similar to the way the Prevention Office lives at the Ministry of Labour.

Requirements of such a skilled trades and apprenticeship secretariat existing within MTCU include the following:

- The effective and dedicated executive leadership of an assistant deputy minister who has significant experience with and a strong commitment to apprenticeship and the skilled trades
- A strong connection with the industries that employ journeypersons and apprentices provided by an active and fully engaged advisory board
- Continuation of trade committees in the system's governance framework to review and provide advice relating to such things as a trade's scope of practice, training standards and curriculum modernization. These trade committees should be populated by equal numbers of employer sponsors and journeypersons.
- An overarching long-range strategy to guide the skilled trades and apprenticeship system and to ensure that all of the system's participants are aligned and roles and responsibilities are clearly defined and that duplication of effort is avoided because the system is comprised of many disparate elements including MTCU, apprentices, journeypersons, employers, colleges, other TDAs, teachers, pre-apprenticeship trainers
- recognition in the strategy that apprenticeship is the primary focus of the system and the Secretariat
- The responsibilities and duties of those employed in the skilled trades and apprenticeship Secretariat in the MTCU must be exclusively dedicated to the skilled trades and apprenticeship Secretariat and not extend into other responsibilities and activities of the Ministry that are not related to the skilled trades and apprenticeship system

3. Enforcement

Enforcement should be a minor focus of the Secretariat. Construction sites are already visited by inspectors from many enforcement regimes. In our view, the enforcement of trade qualifications and scopes of practice could be conducted effectively by health and safety officers from the Ministry of Labour. Increasingly technology can be used to perform these verifications.

4. Promotion

The Skilled Trades and Apprenticeship Secretariat must serve as the one-stop-shop for all things relating to apprenticeship and the skilled trades. The Secretariat must be promoted actively so that it is top-of-mind with all system partners and be the ultimate source of reliable information for anyone considering a career in the skilled trades.

A significant portion of the promotional activity will be electronic as prospective apprentices and system partners search for information. Today, the MTCU has an apprenticeship page on its website that performs adequately. For example, it allows

employers to register online with little difficulty. However, if one were to Google “apprenticeship” the MTCU’s site doesn’t appear on the first page of the Google search. This should be an easy fix, but it points to the need for the allocation of greater resources to enhance electronic promotional capabilities.

The website should be enhanced to address the needs of all system partners including learners, sponsors and TDAs. Activities must be undertaken to promote the website and drive traffic to the website.

Skills Ontario, an independent, not-for-profit organization headquartered in Waterloo, Ontario with 12 satellite offices around the province, is the undisputed leader in the skilled trades promotion space. Skills Ontario provides a wide range of programming to expose elementary and secondary students to careers in the skilled trades including their annual skilled trades competition, the largest of its kind in Canada and their in-school trades careers promotion program that reaches 125,000 elementary and secondary school students annually. This organization served as the promotional arm of the OCoT and received support from the OCoT, as well as from MTCU and the Ministry of Education. Skills Ontario estimates that it leverages the modest public sector investments it receives by a factor of 10 with contributions from the employer community. The result of Skills Ontario’s work is impactful. Rather than reinvent the wheel, we encourage the government to scale up its support for Skills Ontario for more robust promotion of careers in the skilled trades.

5. Single-window of access for apprentices

We agree that there should be one window access into the system, that that window be the Secretariat’s website and that this website must be promoted vigorously and expansively. That window should assist prospective apprentices and registered apprentices:

- to learn about various trades and help them determine the one to which they have the greatest interest and are best suited
- to register as an apprentice
- to identify a sponsor
- with learning supports

6. Bridging the gap between employers, employers of apprentices, and apprentices. I.e. applying an apprenticeship quota for government infrastructure projects.

Hard quotas for hiring apprentices on public construction projects are simply not feasible. Construction work is dynamic, fluid, ever-changing. At any point in time, multiple trade crews are working on a construction project, each with different demands and skill requirements. The workforce on a construction site changes almost daily as the early trades complete their work making it possible for the next trades to begin their work. COCA supports voluntary commitment to hiring of apprentices on a best efforts basis supported by an apprenticeship plan as part of the bidding requirements.

7. Updating curriculum standards and curriculum

As already stated, updating of the curriculum standards and the curriculum should be under the purview of the trade committees established for each trade.

8. Merit-based approach for TDA's

A TDA's success in apprenticeship training is normally measured by its completion rate. While acknowledging that some TDAs perform very well, generally speaking, apprenticeship completion rates are unacceptably low. So the underlying question should be, "Why don't apprentices complete their apprenticeship training?" Some of the factors are:

- The personal abilities and commitment of the apprentice
- The recruitment processes of the TDAs; some TDAs are less concerned about an apprentice's likelihood of completing and simply wants a "bum in a seat"
- Inadequate supports provided to the apprentice by the TDA
- Inadequate supports provided to the apprentice by the sponsor
- Inadequate incentives for the apprentice to complete
- A compensation level for the apprentice that is almost equal or equal to that of a journeyperson
- Fear of final exams
- Inability to schedule in-class sessions

While on its face, the notion of rewarding TDAs that perform very well and penalizing those that underperform has some merit, we think the issue has a level of complexity that requires further study and consultation.

The merit-based approach could also be applied to the performance of employer sponsors. It's common knowledge that some construction employers demonstrate minimal commitment to their apprentices' training and CofQ completions and see their apprentices simply as a cheap source of labour that helps them achieve a more competitive, lower blended payroll. Other more forward-thinking employers, as noted above, demonstrate superior commitments to the training of apprentices.

9. Portable skills: competency-based training or modular/stackable training and whether this can assist labour mobility

Opinions are mixed with regard to competency-based training, sometimes referred to as modular/stackable skills. Competency-based training is at best a stop-gap measure, a band-aid solution for periods of extreme high demand for a very specific set of skills. A worker who is trained in only a small number of specific skills, rather than the full range of skills of a trade, will himself or herself have limited personal mobility to move throughout the industry for example from the residential side of the industry to ICI when activity slows down in the residential sector.

As stated above, the idea of competency-based training may have merit as a band-aid solution and deserves more study.

10. Funding

It is essential that the secretariat be properly resourced. While our members have no preference with regard to where the new system resides, inside or outside of MTCU, they held a uniform strong view about their experiences when the system had been managed previously by MTCU. Some politely described it as "lacking" others as "entirely inadequate," and still others as "a disaster." This experience cannot be repeated if we are to effectively attract and train workers to meet the demands of our economy. The system must be properly funded and resourced.

While there remain significant challenges in recruiting young people to pursue careers in the skilled trades and to register for apprenticeships, there are equal challenges in recruiting employers to take on the responsibilities of training apprentices and serving as sponsors. The current level of financial incentives provided to employers for taking on apprentices is not sufficient to match the associated responsibilities and therefore should be enhanced. The previous system of tax credits may have been more attractive for employers and should be studied further.

The previous high journeyman to apprentice ratios in trades that have ratios were seen as an impediment to growing the number of apprentices in Ontario. The recent

lowering of those ratios to 1:1 for all trades that have ratios was implemented to increase the number of apprentices. With an influx of new apprentice registrants into the system, the Ministry must be prepared to fund new seats for the in-school portion of the training for the much larger number of apprentices that will result from the lowering of ratios to 1:1.

Today, many employers voluntarily contribute significantly to apprenticeship training. Forward thinking employers recognize and appreciate that the industry can only grow and prosper by making investments in training the next generation of construction workers. Let there be no misunderstanding, the construction industry and our society at-large need apprentices; the construction industry must train the next generation of journeypersons to build out the province to support our economy and maintain and improve our way of life.

Here are two examples of significant investments in training made by contractors:

- the contractors who are members of the Ontario Masonry Contractors Association fund the Canadian Masonry Training Centre
- the members of the Interior Systems Contractors Association jointly with their union partners fund the Interior Finishing Systems Training Centre.

These are but two examples and there are many similar situations in other trades.

But the reality is that there are many more employers who make no investment in training. Consideration should be given to the development of a mechanism that levels the funding playing field and enhances employer engagement in funding the skilled trades and apprenticeship system while at the same time recognizing those employers who are already contributing and not placing a further burden on them. There may be a way to expand employers' involvement in funding the skilled trades and apprenticeship system. Designing such a mechanism will require broad outreach with the employer community.

These are our submissions and we trust they are received and considered in the most helpful and constructive way they are intended.

Sincerely



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