
Ontario's New Apprenticeship Strategy

Submission of

**International Brotherhood of Electrical Workers
Construction Council of Ontario (IBEW-CCO)**

August 2017

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The IBEW-CCO represents 11 IBEW Local Unions across Ontario with a membership of more than 17,000 men and women. Our members work in construction and maintenance in various electrical sectors, including:

- construction, renovation and maintenance in non-residential building (Industrial, Commercial and Institutional sector)
- plant maintenance and shutdown operations,
- high-rise residential construction
- low-rise residential construction,
- the power sector,
- linework,
- communications wiring, and
- renewable energy (hydro, wind, solar, geothermal)

Virtually all of our members are certified journeypersons or registered apprentices.

All of our Local Unions deliver skills upgrade training to their members. They also partner with our employers to operate Joint Apprenticeship Committees (JACs). These committees manage recruitment of new apprentices and oversee the training that each apprentice receives. Many of our Local Unions also deliver supplementary training to apprentices ('Saturday School').

The IBEW-CCO is strongly committed to and heavily invested in Ontario's apprenticeship system. We welcome the opportunity to be part of MAESD's process for developing a strategy to strengthen the apprenticeship system.

Goals

We unreservedly support and endorse MAESD's goals of increasing completion rates in the apprenticeship system and increasing the participation of under-represented groups. We also support

clearer and improved pathways for apprentices. We believe that the experience of our union and our trade can contribute to shaping initiatives that will advance these goals.

Data compiled by the Ontario Construction Secretariat indicate that apprentices in the Construction and Maintenance Electrician trade represented 43.3% of the construction-related apprentices in the college system in 2011-2012 (4,841 of the 11,177 apprentices).¹

Completion Rates

Using 2007-08 data, the OCS estimated that the overall completion rate for apprentices in construction trades was 46%. This is clearly a challenge that needs to be addressed. However, it is important to put the overall completion rate into perspective.

- First: the OCS estimated that the completion rate in the Construction and Maintenance Electrician trade was substantially higher: 61%. This estimate was for all apprentices – both union and non-union.
- Second, the OCS also compiled data that compared completion rates for apprentices who were sponsored by a Joint Apprenticeship Committee (as in the union sector) and apprentices who were sponsored by a sole employer. These data were compiled for an average of four compulsory trades. After seven years, the OCS found that apprentices sponsored by a Joint Apprenticeship Committee had a completion rate of 75% compared to 58% for apprentices sponsored by a sole employer.
- Third: based on estimates from our Local Unions, we believe that the completion rate for IBEW apprentices exceeds the OCS's 75% estimates.
- Fourth: by way of comparison, MAESD's summary of Key Performance Indicators for the colleges shows a graduation rate (i.e., a completion rate) of only 66.6%. In other words, the completion rate for unionized apprentices in the compulsory trades is substantially greater than the completion rate for college students.² As well, 100% of these apprenticeship completers were employed in full-time jobs directly related to their training.

The IBEW-CCO agrees that initiatives need to be taken to improve overall completion rates. We believe that the place to start is by considering what contributes to the clearly successful apprenticeship delivery in the unionized electrical sector.

Seven Steps to Improving Completion Rates

1. Realistic Admission Standards: The current 'official' admission standard for entry into the Construction and Maintenance Electrician trade is completion of grade 10. This is both misleading

¹ Ontario Construction Secretariat, *Completion Counts: Raising Apprenticeship Completion Rates in Ontario's Construction Industry* (May 2013), Table No. 8, page 32

² <http://www.tcu.gov.on.ca/pepg/audiences/colleges/colindicator.html>

and detrimental to the image of the trade. As a practical matter, someone with only grade 10 would have considerable difficulty completing the in-school portion of their trades training. Major employers, such as Hydro One, require high school completion which must include successful completion of grade 12 math and English and senior science. Our Joint Apprenticeship Committees similarly require high school completion with grade 12 math, physics and English. In our view, an employer who sponsors an apprentice who has not completed high school is seeking a ‘helper’, not a real apprentice. That employer has no realistic expectation that the apprentice will complete his or her training. Employers who sponsor these individuals mislead the young workers, abuse the apprenticeship system and waste the system’s training resources. Maintaining Grade 10 as the formal entry requirement for an apprenticeship in the Construction and Maintenance Electrician trade sends the wrong message. Step Number One to increasing completion rates is to raise the admission standard for the Construction and Maintenance Electrician trade to grade 12 completion including grade 12 math, physics and English.

2. Math, Physics and English Refresher: Many individuals enter their apprenticeship in the early to mid-20s. This is often a few years after they have completed high school. If these individuals have not been using their math and physics skills, then there will be some erosion of those skills. Before taking the in-school trades training for the Construction and Maintenance Electrician trade, apprentices should be required to take a refresher course in math, physics and English, unless they can demonstrate that they do not need this refresher training. We need to turn the current college approach on its head. Instead of an apprentice’s instructor discovering that an apprentice needs supplementary or refresher training, every apprentice should be required to take refresher training unless they can demonstrate that they do not need this training. The default should be automatic refresher training in math, physics and English. This does not need to be intensive training. In our experience a couple of weeks of training will suffice. In the long run, the investment in this training will reduce overall training costs by increasing success rates. Step Number Two to increasing completion rates is to make refresher training in grade 12 math, physics and English the norm for apprentices, allowing exemptions only to those who can demonstrate that they do not need this training.
3. Stop the Churning: Too many non-union employers use apprentices as a low-cost source of labour. These employers take advantage of tax credits and signing bonuses, but they will not keep the apprentice after their wages rise to 80% of the journeyman rate. These employers have no intention of supporting their apprentices through to completion. Step Number Three to increasing completion rates is to clamp down on the churners. At a minimum tax credits and signing bonuses should be clawed back if an apprentice is laid off. Employers with a history of churning should not be allowed to register new apprentices.
4. Economically Sustainable Intakes: The single greatest cause of non-completion of an apprenticeship is an interruption of employment. To some degree, that is inevitable in the construction industry. However, the challenge of responsibly managing labour supply in a cyclical industry is compounded when employers are allowed to overload the apprenticeship system by taking in more apprentices than long-term labour market conditions will support. Employers have an obvious interest in overloading the apprenticeship system. Apprentices are an economical source of labour, especially after a year of training and experience. The problem is that when the

system is overloaded with apprentices, there is an insufficiency of work. Lay-offs ensue and apprentices cannot complete their training. Overloading the apprenticeship system undermines the apprenticeship system. Step Number Four to improving the completion rate is ensuring that journey-person-to-apprentice ratios reflect an objective and realistic appraisal of the long term employment outlook for both apprentices and journeypersons. It is also essential that the journey-person-to-apprentice ratio be enforced.

5. Joint Committee Sponsorship: There are many excellent employers who sponsor apprentices and support those apprentices through to completion of their training. The Ontario Government, itself, is one such employer. So also are many of our municipal governments and hydro utilities. In the construction industry, however, sponsorship by a sole employer is viable for the handful of large employers, but is a deeply flawed model for most employers. The vast majority of construction employers are small employers. Moreover, these employers operate in an industry that is cyclical. In these circumstances, sponsorship by a sole employer inevitably entails a high risk that an apprentice will not complete his or her training. We know that once an apprentice's employment or training is interrupted, there is a strong likelihood that the apprentice will abandon that training. In the unionized construction industry, we addressed this problem many years ago by vesting sponsorship in Joint Apprenticeship Committees. MAESD should encourage non-union employers in the construction industry to adopt the committee sponsorship model. Step Number Five to increasing completion rates is to restructure the financial incentives offered to construction employers so as to give preference to employers that participate in multi-employer or committee sponsorship arrangements.
6. Apprenticeship Counsellors: Ontario used to employ dedicated apprenticeship counsellors. These were individuals who had completed a trades training. They provided advice and support to apprentices. The current service delivery model has merged this function with broader employment and training counselling support. While that model is appropriate for providing general advice on employment and training programs, it is not an effective way to provide counselling support to apprentices. Step Number Six to increasing completion rate is for MAESD to return to the earlier model of employing specialized apprenticeship counsellors who have a personal background in the trades and apprenticeship system.
7. Increase the Number of Compulsory Trades: The OCS Report showed that completion rates in the compulsory trades are substantially higher than in the voluntary trades. A Certificate of Qualification in a compulsory trade has real economic value. In a voluntary trade, a Certificate of Qualification still has economic value, but that value is diminished by the legal ability of uncertified workers to perform the same work. We recognize that the primary criterion for determining whether a trade should be compulsory is public safety. However, we need to be aware that the status of a trade is an important determinant of the economic value of a Certificate of Qualification in that trade and therefore of completion rates. In our view, there are a number of trades which should be made compulsory. Foremost among these is Powerline Technicians. Step Number Seven to increasing completion rates is to increase the number of compulsory trades or at a minimum to increase the range of work for which a Certificate of Qualification or an apprenticeship registration is a requirement.

Drawing Under-Represented Groups into Apprenticeships

From the perspective of inclusiveness, there are both strengths and weakness in the apprenticeship system. There are two strengths that stand out:

- In the construction industry, the apprenticeship system has been highly accessible to recent immigrants and to their families. Indeed, this is one of the trade and apprenticeship system's most significant contributions to our society and our economy. In the construction industry, the apprenticeship system has been, and continues to be, an important vehicle for integrating recent immigrants and their families.
- The apprenticeship system has also provided thousands of young workers in their twenties with an opportunity to get out of dead-end, semi-skilled work. This is an important social contribution, although it is often not given the recognition that it deserves. A great many of these young workers have no affinity for classroom-centred learning. Were it not for the apprenticeship system, they would be confined to dead-end, semi-skilled jobs.

There are also notable shortcomings in the apprenticeship system. We have not been successful in attracting a significant number of young women workers into apprenticeships in the construction trades. Nor have we had significant success in attracting young workers from aboriginal communities. We need to do more to address these gaps.

Strategies to improve inclusiveness often lose sight of a basic principle: apprenticeships are jobs. Any strategy to expand inclusiveness has to engage employers. We believe that three programs have proven their worth: Hammer Heads, Work Ready Aboriginal People (WRAP) and Helmets to Hard Hats. These programs could be expanded and adapted to achieve greater inclusiveness.

Hammer Heads

Hammer Heads is a program of the Central Ontario Building Trades (COBT). The program focuses on young workers, age 18 to 26, who come from an Aboriginal background or from neighbourhoods characterized by low incomes and high unemployment. Hammer Heads uses a boot camp style training program to turn young workers into professional construction workers with a skilled trade and a real future in our society. All of the young workers who join Hammer Heads are referred to the program by professional caseworkers with Ontario Works, the shelter system, or a Children's Aid Society. Hammer Heads is a unique 12-week pre-apprentice program. When a young worker joins Hammer Heads, he or she commits to working a full construction day. The program combines hands-on training in our union training centres, compulsory academic upgrade training (delivered by Frontier College) and practical experience working on an actual construction sites with one of our partner employers. After completing their safety training, the Hammer Heads participants receive a basic orientation to each of the construction trades. This orientation is delivered by the 16 training centres operated by the affiliate unions of the Central Ontario Building Trades. Through partnerships with industry suppliers, the COBT has arranged for each of the Hammer Heads participants to be provided with a safety helmet, safety boots, construction clothes, a safety vest and a tool kit. The key to the success of

Hammer Heads is our partnership with construction employers. After receiving basic training, each Hammer Heads participant goes to work on an actual construction site, working side-by-side with other professional construction workers. This is the key that unlocks the door to a real job and a real future as a registered apprentice in a construction trade. For Hammer Heads participants, the final step is to become a registered apprentice in one of the construction trades. The program has a high success rate.

Work Ready Aboriginal People (WRAP)

The Work Ready Aboriginal People (WRAP) program is a partnership between Grand River Employment and Training (GREAT) and the Hamilton-Brantford Building Trades Council of Ontario. GREAT is an Aboriginal Skills Employment and Training Agreement Strategy (ASETAS) holder with Service Canada that works with Six Nations members to meet their employment and training needs. Six Nations of the Grand River is the largest First Nations reserve in Canada.

WRAP focuses on Aboriginal Youth in the 18-30 age group. WRAP is a 20-week program. The program provides intensive training in health and safety, pre-apprenticeship exposure to a range of construction trades, and an opportunity to work on a construction site. The program also provides 8 weeks of mandatory upgrade training in Grade 12 math and physics. Recently the program has also included a week of cultural awareness dealing with the identity, history and culture of Haudenosaunee People. A majority of those who have completed the program have entered formal apprenticeships.

Helmets to Hardhat

Helmets to Hardhats is a partnership with Canada's Building Trades Unions, their many employers across Canada, and Government stakeholders. The program offers apprenticeship opportunities in any of the building and construction trades. Helmets to Hardhats is open to anyone who has served or is currently serving in the Regular or Reserve Force components of the Canadian Armed Forces and is looking to transition into a skilled trades career. An adjunct program, Teens to Trades, is also operated by Helmets to Hardhats to provide career opportunities to young workers who are in the reserves. Helmets to Hard Hats is funded by governments, its partner employer and labour organizations.

The key to the success of Hammer Heads, WRAP and Helmets to Hard Hats is that they are based on partnerships between construction unions and construction employers. There are three steps that the Ontario government can take to expand and adapt these types of programs:

- First, MAESD could provide seed money to other regional building trades councils to initiate programs similar to Hammer Heads and WRAP. There is no reason why the Hammer Heads and WRAP models cannot be applied to other regions of the province.

Second, public sector procurement policies should require employer participation in inclusiveness programs as a qualifying condition for jobs above \$1.0 million.

Third, funding for inclusiveness initiatives should focus on programs that are founded on viable partnerships that engage unions, employers and community-based organizations.

Pathways to Apprenticeship

(a) Increasing the Number of Apprenticeships

When considering strategies to open new pathways to apprenticeship, it is important to distinguish between the compulsory trades and the voluntary trades. In the case of the compulsory trades, the capacity of the system to take in more apprentices is constrained by the long-term employability prospects of journeypersons. We have seen no evidence that indicates a systemic shortage of electricians in Ontario. Guided by the BuildForce projections, we have successfully managed recruitments to offset the replacement demand arising from retirements and to meet additional demand from the cyclical increase in construction spending. We also need to bear in mind that to the degree we are successful in improving overall completion rates in the compulsory trades, there will be *less* scope, not more scope, to increase apprentice intakes.

The situation is different in the voluntary trades. There is significantly more scope to increase apprenticeships in the voluntary trades. The reason for this is that many of the workers who will be retiring are not certified journeypersons. The goal should be to replace the retiring cohort of uncertified workers with new entrants who are on the path to certification. This will both increase the number of apprentices and upgrade the overall level of skills in those trades. To do that, however, you must create a demand for certified journeypersons. The current wave of retirements presents a singular opportunity to substantially strengthen and modernize the trades and apprenticeship system in the voluntary trades. The voluntary trades constitute a majority of the construction work force. However, they represent only 27% of the apprentices in the college system (3,012 out of 11,174) – and two-thirds of those are Carpenters.³ The key to increasing the number of construction industry apprenticeships is to increase the demand for certified journeypersons in the voluntary trades and to meet that demand through an expansion of the apprenticeship system. Any effort to increase the number of apprenticeships in the voluntary trades will fail if there is no concomitant effort to increase the demand for certified journeypersons in those trades.

There three ways that we can increase the demand for certified journeypersons, especially in the voluntary trades:

³ Ontario Construction Secretariat, *Completion Counts: Raising Apprenticeship Completion Rates in Ontario's Construction Industry* (May 2013), Table No. 8, page 32

- First, public sector procurement policy should specify that trades workers on relevant construction projects should be either certified journeypersons or registered apprentices supervised by a certified journeyperson. It makes no sense whatsoever for governments to say that apprenticeship and trade certification are important, but that you do not need any formal training or qualifications to work on a public sector construction project.
- Second: Ontario should introduce a system of *contractor* licensing similar to the system that operates in California. That system requires the use of licensed contractors on jobs over US\$500 and limits eligibility for licensure to persons who are qualified journeypersons. In Ontario, such a system already operates in the electrical contracting industry, by virtue of the contractor registration requirements of the Electrical Safety Authority. This contractor licensing model should be extended to other trades.
- Third: Expand the number of compulsory trades.

(b) Youth Apprenticeships

If *and only if* steps have been undertaken to increase the demand for certified journeypersons, we can also expand the number of pathways to apprenticeship and trade certification. Our apprenticeship system contrasts with the ‘dual system’ German dual system. In our system, the typical apprentice is in his or her mid-to-late twenties. In the German system, the typical apprentice is 16-18 and is continuing in-school education in conjunction with workplace-based training. Most attempts to adapt the dual system to Ontario have had limited success, especially in the construction industry.

In the construction industry, there are four principles that must be the foundation of any strategy to open a pathway to apprenticeship for youths under the age of 18:

- First, intensive health and safety training is essential before any worker, especially a young worker, is exposed to a construction workplace. The current OYAP program pays an employer’s WSIB premiums for young workers, but does not provide for any intensive, pre-employment health and safety training. It merely requires that the employer comply with the *Occupational Health and Safety Act* by maintaining a safe workplace. In the construction industry, that is simply not good enough. Without prior safety training, you should not be allowed to even set foot on a construction site. The Hammer Heads program run by the Central Ontario Building Trades starts with an intensive health and safety training program developed for Hammer Heads by the Workers Health and Safety Centre. So also does WRAP.
- Second: persons in a youth apprenticeship should be paid an appropriate rate of pay based on the established norms of the apprenticeship system. A

program which allows paid apprentices to be displaced by unpaid apprentices will never be supported by our Union.

Third: no one should enter a youth apprenticeship without first having completed a year-long pre-apprenticeship program in which they are exposed to a range of trade options.

Fourth: no one should enter a compulsory trade with less than Grade 11 including Grade 11 math physics and English and with a commitment to take these subjects in Grade 12. It may be appropriate to also apply this standard to some of the voluntary trades (e.g., Powerline Technician).

Design a program based on these principles and the IBEW-CCO will be your partner.

(c) Respect Different Learning Styles

Classroom-centred learning is not for everyone. One of the great strengths of the apprenticeship system is the weight that it assigns to on-the-job learning and the opportunity to apply what you learn on the job. The problem with the college-dominated training industry is that it is too classroom focused. The most recent example of this undue focus on classroom learning is the proposal to front-end load all 28 weeks of an apprentice's in-school training. This would replace the current model that alternates between one-the-job and classroom learning with a more classroom-centred approach. There may be some apprentices who would prefer this approach. We would not stand in their way. However, we have not heard our apprentices calling for such a change. This proposal to front-end load the in-school training comes from the college system and some employers, not from apprentices. We are very concerned that a shift to front-ending the in-school training will disadvantage those who are drawn to apprenticeship precisely because it is a more practical, on-the-job approach to learning. In the Construction and Maintenance Electrician trade, the effect of front-ending the in-school training could be an increase in drop-outs and a reduction in completion rates – the exact opposite result from what is desired.

(d) Navigating the System

Suggestions have been made to create a more centralized apprenticeship management system. While these ideas have not been sketched out in detail, they seem to share the following characteristics:

- there would be one web site where employers or joint committees seeking apprentices and apprenticeship-seekers would all register;
- this master web site would also provide complete information on the apprenticeship and trades system.

An integrated information resource would be a positive contribution. However, this resource would need to link to other resources that are separately maintained by unions and their industry partners. It is unreasonable to expect organizations that have a deep investment in the apprenticeship system to disband their information resources, especially when those resources appear to be working for them.

There is merit to an integrated registry of employers seeking apprentices and young workers seeking apprenticeships. However, neither employers nor joint committees should be limited to recruiting through the centralized registry. There should be no interference with the recruitment strategies of successful programs, such as Hammer Heads, WRAP and Helmets to Hard Hats.

Concluding Comments

The Ontario College of Trades was established in 2009. OCOT is one of the most important innovations in the apprenticeship system anywhere in North America. OCOT represents what has long been sought in Canada – industry leadership in apprenticeship. It should come as no surprise that such a major innovation has been accompanied by a good deal of stakeholder debate. The IBEW-CCO was an early advocate of OCOT. While we have been forthright in our disagreement with some of the changes to OCOT’s governing legislation, we remain committed to an apprenticeship system that is industry-led, not government-led. We strongly believe that OCOT should play the leading role in strengthening and modernizing Ontario’s apprenticeship system.

Some have criticized the apprenticeship system for being fragmented. In our view, the most important fragmentation is the separation of responsibilities between OCOT and MAESD. OCOT is responsible for trade and training standards, for certification and for determining whether a trade should be voluntary or compulsory and the journeyperson-to-apprentice ratio where this applies. MAESD accredits training deliverers and determines the allocation of training seats. In our view, these responsibilities should be transferred to OCOT. OCOT should be the acknowledged leader in the apprenticeship system. OCOT should be taking the lead on Ontario’s new apprenticeship strategy.

