



# How Alberta Has Failed Teen Workers



A report for the Parkland Institute by Bob Barnetson





# Contents

## Illegal and Injurious: How Alberta Has Failed Teen Workers

Dr. Bob Barnettson

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<b>Acknowledgments</b>	ii
<b>About the Author</b>	ii
<b>About Parkland Institute</b>	ii
<b>Executive Summary</b>	1
<b>Introduction</b>	3
<b>Teen Employment</b>	4
<b>Injuries and Teen Employment</b>	6
<b>Teen Employment in Alberta</b>	7
<b>Safety and Teen Employment in Alberta</b>	11
<b>Regulatory Failure in Alberta</b>	14
<b>Why Is Teen Injury and Illegality Acceptable?</b>	16
<b>The Provincial Tories and the Business Lobby</b>	18
<b>Death and Serious Injuries of Teen Workers</b>	20
<b>Who Can Help Teen Workers?</b>	21
<b>Recommendations: Improving Employer Compliance with Teen Employment Laws</b>	23
Additional worker and employer education	23
Increased monitoring of teen employment	23
Increased enforcement and punishment	24
Increased worker access to unions and unionization	24

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## Executive Summary

Most Albertans will hold a job at some point during their teen years. Jobs provide teens with money, a sense of accomplishment and useful vocational skills. Yet teens employed in Alberta also face widespread illegality and injury on the job. Research suggests that:

- up to 70% of adolescents (12–14) may be employed in illegal occupations.
- teens (12–17) routinely face wage theft and are employed for more hours than they are legally allowed to work.
- more than half of all employed teens experience work-related injuries each year.

This widespread injury and illegality in teen employment reflects that Alberta does not effectively enforce the employment laws that are supposed to protect teen workers, including the Employment Standards Code and the Occupational Health and Safety Act. Employers face almost no chance of being caught violating these laws. And, if they are caught, they are unlikely to be penalized for noncompliance.

“I was stuck fencing with a 12-year-old using five tonnes of equipment with no way to contact for help. I was the oldest one there. That’s retardedly unsafe.

–15-year-old male<sup>1</sup>

There are many factors that contribute to the government’s historical unwillingness to enforce the laws it has passed. Teen employment is often thought of as a character-building experience with wage theft and injury — endemic features of employment in Alberta — being framed as educational experiences. The close relationship between the former Conservative government and Alberta’s business community also created reluctance on the part of legislators to sanction meaningful enforcement of employment laws.

The election of a New Democratic government in Alberta may significantly change the political calculus around worker rights. For example, one of the first acts of the Notley government was to raise Alberta’s minimum wage over a series of years. As Alberta revisits the content and administration of its employment laws, the following changes could significantly improve the working lives of Alberta teens:

1. Require employers to have permits for workers under the age of 18. Permitting creates an opportunity to educate employers about their obligations as well as provides data to drive policy decisions and enforcement activity.

2. Increase the awareness of teens about both their workplace rights and how to use those via curricular change in Alberta schools.
3. Increase the monitoring of teen employment by hiring additional workplace inspectors and tasking them with random and targeted inspections of workplaces employing teens.
4. Increase the reputational and financial costs of employer noncompliance with teen employment laws by ticketing noncompliant employers, refusing them permits to hire teens in the future, and publicizing their names.
5. Increase teen workers' access to union representation by reforming Alberta labour laws such as dispensing with the need for a certification vote when a majority of workers are union members and providing for first-contract arbitration.

## Introduction

Getting a job is often seen as a rite of passage for teenagers — a way to develop a sense of responsibility, a work ethic, and marketable skills. Yet teens who work in Alberta often face unfair, unsafe, and illegal working conditions. Recognizing the risks employment poses to the physical, intellectual, and moral development of teens, governments across Canada — including the Government of Alberta — limit when and where teens can work and what they can do in the workplace.

### Children, Adolescents, Young Persons, and Teens

Broadly following Alberta's *Employment Standards Code*, this report defines children as those younger than age 12, adolescents as those aged 12–14, and young persons as those aged 15–17. The all-encompassing term “teens” refers to anyone from 12–17 years old.

Whether or not these teen employment laws result in fair, safe, and legal workplaces depends upon how effectively governments enforce their laws. If there is little chance of an employer being caught violating the laws and no penalty for doing so, employers may well ignore those laws.

Based upon seven years of study, this report suggests Alberta employers regularly violate teen employment laws because of a weak enforcement regime that is overly reliant upon complaints by teens. Teens are reluctant to report violations and, indeed, may not be able to identify common employer practices which are illegal. This weak enforcement regime has meant:

- up to 70% of adolescent (12–14) workers are employed in prohibited occupations.<sup>2</sup>
- many teen (12–17) workers report wage theft — illegal deductions and withholdings from their earnings — and working more hours than they are legally allowed to work.<sup>3</sup>
- occupational health and safety training is provided to a minority of teen workers.<sup>4</sup>
- 49.7% of employed adolescents (12–14) and 59.0% of employed young persons (15–17) report work-related injuries each year.<sup>5</sup>

Female teens also report routine sexual harassment by customers, co-workers, and employers. Such obviously poor working conditions suggest that Alberta's system of protecting teens from unfair, unsafe, and illegal employment has failed.

“ I was at work and one of the older men followed me to the washroom and tickled me then reached up under my shirt and grabbed my boob. I did nothing because I was only nine, so who would have listened to me.

–16-year-old female

Alberta's former Progressive Conservative government was reluctant to increase enforcement activity due to its close association with employer groups. Indeed, it weakened workplace protections for teens at the request of employer groups. Combined with the public perception that teen work is educative and workplace difficulties are an educational rite of passage, the Conservative government's unwillingness to enforce its employment laws meant there were few options available to reducing the incidence of unfair, unsafe, and illegal work.

The election of a New Democratic government in the spring of 2015 may herald opportunities to improve teens' working conditions. The policy options available to the government include increasing efforts to educate employers about their obligations and workers about their rights, developing an effective monitoring system, increasing enforcement activities (including the reputational and financial costs of employer noncompliance), and increasing workers' access to unions and unionization. The willingness of Alberta's new government to address such concerns is, as yet, unclear.

## Teen Employment

The employment of workers aged 15–19 is commonplace in developed countries, such as Australia (45.6% employed), Canada (32.9%), the United Kingdom (52.2%), and the United States (34.8%).<sup>6</sup> Data on adolescent (12–14) employment is more elusive, with employment rates of 52.9% reported in Ontario (2003), 41.5% in British Columbia (2005), and 43.7% in Alberta (2012).<sup>7</sup> Adolescent employment rates in the United States and New Zealand are similar.<sup>8</sup>

Employment is said to provide teens with opportunities to develop useful skills and attitudes,<sup>9</sup> but there is also good evidence that teen employment has negative outcomes. For example, teen employment is often associated with declining academic performance and dropping out of school, although it is unclear whether employment results in worsening academic performance or whether poor academic performance triggers increased employment.<sup>10</sup> More troubling is the strong evidence that employment routinely expose teens to illegal and injurious employment.<sup>11</sup>

“ I did not have any break and it wasn't good with my school. I didn't have much time to study because I had to stay with them late till they close the store. I could not get off work earlier.

–17-year-old female



For this reason, all Canadian jurisdictions place some limits on the type, duties, duration, and location of teen employment. These limitations are set out in an amalgam of employment standards, school attendance, child welfare, and occupational health and safety laws. Unfortunately, violations of these laws are commonplace.<sup>12</sup>

“ Giving us short notice on our shifts; not giving us overtime pay. I know that my boss takes advantage of us, but I don’t think I’d want to stand up to him ’cause then I’d get fired.

–Grade 11 female

The enforcement of Canadian workplace laws is largely complaint-driven, and reveals only a minority of violations.<sup>13</sup> Workers may choose not to complain because of ignorance, a reluctance to stand up for themselves, and/or the belief that remedy is unlikely.<sup>14</sup>

Complaint-driven enforcement may also be inappropriate for minors. Teens are less likely than adults to know and assert their rights. And they often have little power when dealing with adults, such as their employers.<sup>15</sup> While parents may intend to intervene in workplace issues on behalf of teen workers, research suggests they do not.<sup>16</sup>

“ I was asked to go out on an icy roof and I did because I didn’t know if I had to.

–Grade 11 male

## Injuries and Teen Employment

Despite concerns about the injurious nature of teen employment, reliable injury statistics are strangely elusive. Academic researchers have found evidence of widespread injury among teen workers in Canada:

- In Ontario and British Columbia, 6.0% and 3.5% respectively of adolescent (12–14) workers reported injuries serious enough to require medical treatment.<sup>17</sup>
- Among young persons (15–17) employed in Ontario and Alberta apprenticeship programming, 20% reported injuries serious enough to miss work and 4.9% reported injuries serious enough to preclude future employment in the trades.<sup>18</sup>
- A survey of nearly 20,000 Canadian workers aged 15–25 found roughly one-third reported at least one minor injury in the preceding four weeks, with workers aged 15–18 reporting more injuries than older workers.<sup>19</sup>
- A survey of Alberta teens (12–17) found 49.7% of employed adolescents and 59.0% of employed young persons (15–17) experienced at least one work-related injury in the previous year, with most reporting multiple injuries.<sup>20</sup>

Inexperience and an unwillingness to refuse unsafe work are possible explanations for these high levels of injury. Yet blaming workers for their injuries obscures the fact that employers largely determine which hazards exist in a workplace when they design jobs. Further, teens often hold jobs “characterized by limited social benefits and statutory entitlements, job insecurity, low wages and high risks of ill health.”<sup>21</sup> Such precarious forms of employment are associated with a greater risk of work-related injury or illness and lower propensity to report such injuries.<sup>22</sup>

“People should be more aware of the danger of the job and they should be told. You can’t expect them just to know.

–16-year-old male

Workplace injuries are often said to be the result of worker ignorance and, consequently, training is prescribed.<sup>23</sup> Unfortunately, the evidence that safety education reduces workplace injuries is weak.<sup>24</sup> Further, many new and young workers do not receive health and safety training.<sup>25</sup>

Research on youth-focused training suggests that such training tends to impart knowledge about safety rather than developing the self-advocacy skills necessary for workers to assert their rights.<sup>26</sup> And youth-oriented safety training may gloss over the difficulty teens face navigating conflicts between job demands and safety rules.<sup>27</sup>

## Teen Employment in Alberta

Alberta's *Employment Standards Code* stipulates the minimum wage, maximum hours of work, and other terms of employment for all Albertans. It also contains specific rules about the employment of teens.<sup>28</sup> The employment of children under the age of 12 is normally prohibited. By contrast, young persons (15–17) may work at any type of job, but face restrictions if working between 9 pm and 6 am. Adolescents (12–14) are restricted to light work, such as:

- Delivery person for flyers, newspapers, and handbills
- Delivery person for goods and merchandise for a retail store
- Clerk in a retail store
- Clerk or messenger in offices

Adolescents may not work more than two hours on a school day, eight hours on a non-school day, or between 9 pm and 6 am. Employers may apply for a permit to employ an adolescent in a job other than those listed above. None of these rules presently apply on Alberta farms and ranches.



On school nights I worked six-hour shifts even though I was only 14 at the time.

–Grade 11 female

Under pressure from the restaurant and food services industry, Alberta's former Progressive Conservative government loosened the rules around the employment of adolescents in 2005.<sup>29</sup> As a result of these changes, adolescents may perform hosting duties, cashier duties, dish washing, bussing tables, waiting tables, providing customer service, assembling orders, or cleaning.<sup>30</sup> The Conservatives considered a further loosening of the rules around adolescent employment in 2014, but these changes did not come to pass.<sup>31</sup>

Broadly speaking, Alberta allows teens to begin working earlier and to work longer than other Canadian jurisdictions.

Alberta allows children to begin working at age 12, while the norm in other provinces is 14 (although there are often exceptions around family businesses, including agriculture).<sup>32</sup>

That said, Quebec has no minimum legal age of employment.<sup>33</sup> British Columbia also allows children to work at age 12. Prior to 2004, BC required employers to acquire a permit to employ adolescents (12–14). This reduction in government oversight of teen employment in BC was followed by an increase in injuries among all teens, including a tenfold increase in the number of injury claims for adolescents. This increase in injuries is thought

to reflect both an increase in the overall number of 12- to 14-year-olds working as well as the absence of state regulation of teens' employment conditions.<sup>34</sup>

Alberta allows adolescents to work up to 26 hours during a school week. In Saskatchewan, the maximum is 16 hours and in Manitoba and British Columbia the maximum is 20 hours.<sup>35</sup>

Alberta's list of prohibited occupations broadly conforms to those in provinces other than BC, which has no rules around what work adolescents may perform.

“ A manager tried to make me clean blood  
and I refused saying I could contract AIDS,  
potentially.

–15-year-old female

Alberta has almost no teen-specific rules around occupational health and safety.<sup>36</sup> Alberta's longest running workplace health and safety awareness campaign aimed at teens is the “Bloody Lucky” campaign. This campaign adopts a “blame the victim” approach; it features a series of videos portraying teens as careless, and ignores the role of the employer in creating injurious workplaces. The campaign does little to teach teens how to respond when faced with unsafe workplaces.<sup>37</sup>

“ I wasn't trained until two years after I [started]  
work there. I had to figure everything out for  
myself.

–17-year-old female



## Adolescent Jobs in Alberta, 2009

In 2009, babysitting (31.2%) and newspaper/flyer delivery (15.6%) were the most common jobs for Alberta adolescents (12–14). Restaurant work and janitorial work were each performed by 7.8% of the sample, followed by working on a golf course, working in sports, agricultural work, and performing yard work (5.2% each). Chores, construction work, office work and unspecified work were each performed by 2.6% of respondents.<sup>39</sup>

The Government of Alberta does not collect employment data on Alberta adolescents, while data on the employment of young persons tends to be aggregated into a 15- to 24-year-old category. However, a 2013 study found 43.7% of adolescents and 61.5% of young persons reported being employed in the previous year.<sup>38</sup>

A 2008 survey of 1,200 Alberta households found that 21.4% of jobs held by adolescents were illegal, including janitorial services, sports teams, and working on a golf course.<sup>40</sup> By contrast, 28.6% of jobs appear to be legal types of employment, such as newspaper delivery, retail sales, restaurants, and agriculture.<sup>41</sup> The remaining 50% of jobs performed were of unclear legality, such as babysitting, yard work, and unspecified duties.<sup>42</sup>

This rampant illegality was brought to the attention of the former Conservative government in 2011 by then-opposition Member of the Legislative Assembly Rachel Notley. The government, represented by the Minister of Employment and Immigration at the time, Thomas Lukaszuk, responded to questions about a report that quoted this survey data by misstating the report's findings, and then dismissing them:

**Ms. Notley:** A recently released study shows that 8,200 Alberta children ages 9 to 11 are working in our province.... Will the Minister of Employment and Immigration acknowledge that it is his government's neglect and disinterest in regulating child employment that has facilitated this practice of child labour...?

**Mr. Lukaszuk:** Mr. Speaker, what the member is telling us and what the report says is that in Alberta right now there are 126,000 children exploited, working in our businesses. Their parents obviously consent to it, this government obviously consents to it ... and all of us are somehow patronizing these businesses. How can that be possible?<sup>43</sup>

The study was repeated with similar results in 2009.<sup>44</sup> The 2009 study also included interviews with 20 teens and their parents in the Edmonton area that revealed regular violations of employment standards rules, including:

- working too many hours, most commonly a four-hour shift on a school day.
- receiving less than the minimum wage or minimum call-in pay.
- working underage, in prohibited occupations, or performing prohibited tasks.<sup>45</sup>



The majority of adolescents in Alberta's restaurant industry also reported illegal wage deductions, and employers failing to obtain parental permission or complete required safety checklists. Half of the interview subjects reported multiple violations of their rights. Few of the teens or their parents were aware that the employer behaviors they described were contrary to the legislation.

“ I was getting \$9.05 an hour for hostessing [the minimum wage was \$9.40]. It's supposed to be \$9.05 an hour for people serving alcohol. And I wasn't serving alcohol. I didn't do anything about it.

—15-year-old female

## Safety and Teen Employment in Alberta

The 2009 study also found that only a minority of the teens interviewed received safety orientations. Where safety information was provided in the workplace, it included posters on the wall, pamphlets, and online training modules. Teens were not specifically directed to read anything and their knowledge of safety procedures was not assessed. None of the teen workers reported engaging with this material.

“Training would have been better if someone who was only working there for two weeks wasn’t training me. It was like the blind leading the blind.

–Grade 10 female

A 2012 study (with a sample of nearly 2,000 Alberta teens) found approximately one-quarter of employed adolescents (12–14) reported their employer fully disclosed workplace hazards and provided full training about how to deal with these hazards. Among employed young persons (15–17), the incidence of full disclosure and training increased, to approximately 40% and 50%, respectively. Numerous respondents noted additional information would have improved safety training.

“An actual written procedure about how to clean the grill and deep fryer rather than just “be careful.”

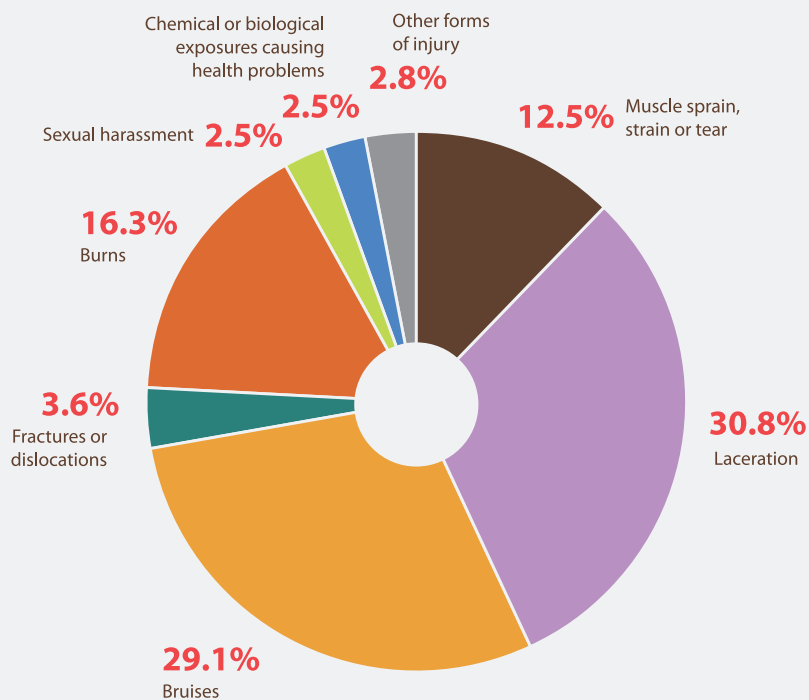
–17-year-old female

Among employed teens, 49.7% of adolescents and 59.0% of young persons reported an injury during the previous year.<sup>46</sup> Among both groups, cuts, bruises, burns, and sprains were the most common form of injury (See Figures 1 and 2).

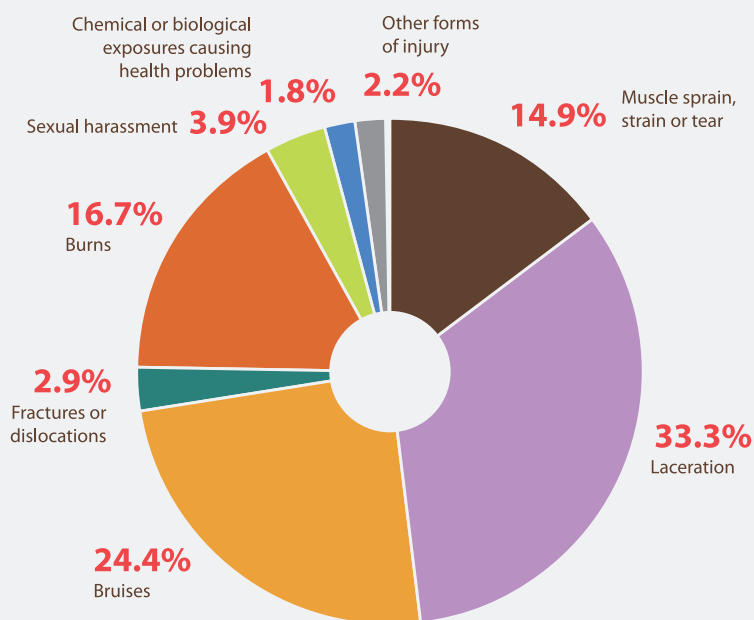
“I had my arm sucked into a machine and ripped open from my wrist to my elbow.

–16-year-old male

**Figure 1: Adolescent (12–14) Injury Type and Percentage**



**Figure 2: Young Person (15–17) Injury Type and Percentage**



In both groups, the majority of those reporting work-related injuries reported more than one form of injury. Where specified, “other” forms of injury included amputation, eye injury, stress, sexual assault, bullying, and temperature- and animal-related injuries.

These injury reports undermine the notion that the employment of minors is mostly a benign activity.

“ Verbal harassment towards female workers;  
manager would call them bitches, etc.

–Grade 11 male

Of particular note was the large number of written comments regarding sexual and other forms of harassment in the workplace.

“ I’ve never been harassed by the people I work  
with but I have been sexually harassed by a lot  
of customers.

–Grade 11 female

## Regulatory Failure in Alberta

Like most jurisdictions, the enforcement of Alberta's employment legislation is largely complaint-based. Alberta conducts some random and targeted inspections, but the overall rate of workplace inspections is low. For example, Alberta's 8,500 Occupational Health and Safety inspections in 2013/14 were spread across approximately 154,000 businesses. This means a business is likely to be inspected on average, less than once every 18 years.<sup>47</sup> The Government of Alberta does not report on inspections or violations related to its teen employment laws.

“ I was underage, they gave me odd hours ...  
and they wouldn't pay me by the number of  
hours I worked.

—Grade 10 female

### **i** Prosecutions Related to Teen Workers

There were convictions in 2002 (when a 14-year-old boy died on a construction site), 2006 (when a 14-year-old boy was killed on the job), and 2009 (when a 15-year-old was required to work alone after midnight).<sup>48</sup> The government currently has one prosecution underway regarding a 14-year-old worker who fell four meters off a roof on a construction site.<sup>49</sup>

Compounding the minimal level of workplace inspection is the absence of meaningful penalties for violations. When employers are caught violating teen employment laws, they are usually ordered to simply remedy the violation. Prosecutions are rare, with only four prosecutions related to teen employment since 2000.

The absence of any real risk of being caught violating Alberta's teen labour laws or punishment for doing so may help explain the regular violations and high level of injury noted in the 2009 and 2012 studies.

Practically speaking, it falls to parents to ensure their children's workplaces are fair and safe. Yet the evidence suggests most do not do so. Approximately half of the 20 parents interviewed in the 2009 study indicated they had considered workplace safety before their teen commenced working. The evidence they used in deciding whether a workplace was safe enough for the child to work there included:

- their own experiences in similar jobs,
- their perceptions of the workplace as a customer, and/or
- the general reputation of the company.

No parents indicated they acquired any specific evidence about the workplace risks their teen faced or used such evidence in their decision-making. In some instances, parents were surprised to learn that their teens routinely handled box cutters, worked on ladders, lifted heavy boxes, and used fryers and other equipment.<sup>50</sup>

“ I fell off a ladder, twisted my ankle pretty bad.  
But my boss didn't do anything.

—14-year-old female



When questioned about how they would handle disputes about teens' pay or other workplace problems, parents indicated they would first approach the employer. If this was unsuccessful, two-thirds indicated they would pursue the matter with the government. Forcing their teen to quit was also a common response. Yet, as noted above, few parents are knowledgeable about employment laws or the conditions of work in their children's workplace.<sup>51</sup>

In the one case, a parent indicated she would pursue any violation of her daughter's rights with the government. She later indicated she thought her daughter had experienced a violation of her employment rights. Yet, in the end, the parent decided not to pursue the matter as it was not worthwhile for her to do so. This case raises questions about whether parents can and do follow through with their intentions.

For their part, teen workers indicated they would also first approach the employer. If that was unsuccessful, half indicated they would quit. Only 15% indicated they would raise the issue with their parents, while the remainder would take no further action.

“ I quit because my supervisors were drinking on the job and leaving me to work the kitchen which I wasn't legally allowed to be in.

—Grade 10 female

## Why is Teen Injury and Illegality Acceptable?

A series of interviews with academics, trade unionists, and not-for-profit staff in 2014 (from which the following quotes are drawn) found the framing of teen labour may reduce the pressure on the state to take action on injury and illegality. For example, adults often view teen employment as character-building, while its adversities are seen as a rite of passage. Framing employment as an educative experience transforms wage theft and workplace injuries from violations of workers' rights into learning opportunities. As one not-for-profit staffer put it:

I think there is this perception, by adults ... that work is good for [teens]. And by extension, some people are saying, "that is how they are going to learn, by actually making mistakes." And if you take that further, you go, "getting near misses is the best way to learn."

The tendency of adults to reframe bad working conditions for teens into character-building life experiences may, in part, reflect the widely held view that teens are lazy and irresponsible. According to one not-for-profit staffer:

We would walk into a restaurant and talk about what we do. "Oh we're teaching kids about their rights in the workplace." And, on more than one occasion, the response is "Teach them their rights? Teach them how to work, first." And that seems to be a pervasive attitude. There is a sense young people are entitled, and maybe there is some truth to that, but they shouldn't die because of that.

According to a not-for-profit staff member, this reframing may also reflect, in part, the widely held view that "good workers don't complain":

This kind of mythology of Albertans as hard, unwavering, uncomplaining workers makes it unlikely that any worker is going to complain.

This characterization of “good workers” contains both descriptive elements (workers don’t complain) and prescriptive elements (workers should not complain). This combination of elements is powerful because it displaces legitimate concerns about illegal and injurious work with an idealized (albeit not ideal) norm that some have termed the cult of “git ‘er done.”

“I think that just becomes a rationalization of the things that go wrong in workplaces frequented by teenagers as less important. “Oh, you got a burn from a steamer from the expresso machine—well, you learned.” It is a way of placing blame on the individual, which is a predisposition anyway. To want to put responsibility for things that happened at work on the worker. “You did it. It is your fault.”

–Academic

The framing of teen employment as character building makes it hard to see teen workers’ treatment as unjust and requiring change. It also raises questions about whether government regulation of teen employment is necessary and legitimate. This, suggests one academic, normalizes government turning a blind eye to employer noncompliance with employment laws:

It is almost like [the Conservatives] cut a deal with the employers. “Look, we will set up some explicit rules for when we consider it valid for us to breach your domain.” ... It allows them to be almost apologetic for coming in. “We didn’t want to come in, but we got this call.”

Yet the government’s pattern of ignoring widespread injury and illegality in teen employment sits rather uneasily beside Alberta’s teen labour laws — laws enacted to protect teens due to their greater vulnerability in the workplace than adult workers.

## The Provincial Tories and the Business Lobby

Employer groups lobbied the former Conservative government hard for labour laws that minimize the cost of workers. For example, in 2010, Alberta began reviewing its minimum wage and eventually created a two-tiered system, whereby workers who serve alcohol were paid less than workers who do not. Of the 220 submissions received by the government, 75% were from members of the Canadian Food and Restaurant Association (CFRA).<sup>53</sup> The CFRA also (unsuccessfully) sought a lower “training” wage for new workers and followed up its write-in campaign with meetings with then-premier Ed Stelmach and then-minister of employment and immigration Thomas Lukaszuk. One of the first acts of the new NDP government was to begin phasing out this tiered minimum wage, which will be eliminated by 2016.

“It is highly exploitable workforce and it is [in] business’ ... interests to have that pool of labour with minimal government oversight and minimal regulations. ... Why would there be any interest in the government in upsetting the availability of such a useful labour pool?”

–Academic

Historically, Alberta’s employers have been effective at lobbying for looser employment laws because of the political rewards (e.g., public support, political donations, post-politics career opportunities) that can accrue to politicians who comply. By contrast, any increase to enforcement generated political costs, such as public criticism and the withdrawal of financial support. Some former Conservative MLAs may also have been personally uncomfortable with additional enforcement because they viewed themselves as members of the business community. As one academic asked:

How do [the Tories] explain to their friends that they are just randomly showing up and doing inspections? “What are you doing?” “Why are you targeting me?” And that can be a very touchy political subject for them.

By contrast, the absence of enforcement is difficult to see and there is little political reward available to politicians for increasing enforcement.

“Parents have quite little oversight of what their children are doing for work and what labour regulations are being violated. So if parents aren’t interested in being involved and looking into what is going on, what would be the impetus for government?

–Academic

Teens themselves may be unwilling to seek greater enforcement, either through political action or by using existing complaint process. For some teens, the cost of exiting the workplace may be lower than the cost of resistance and advocacy. Yet, for teens whose employment makes an important contribution to household income or represents a future career path, accepting illegal or injurious conditions of work may represent difficult calculation of risk versus reward.



## Death and Serious Injuries of Teen Workers

A recurring theme in the 2014 study was that perhaps the greatest opportunity for improved enforcement centres on the threat posed to the government's legitimacy by dead or seriously injured teen workers. According to one academic:

I truly hate to say it, but a dead kid. That is an awful, horrible thing to say, but we have seen, time and time again — working alone only became an issue when there were a couple of deaths in BC and Alberta because people were working alone. Issues become a concern only when they become a political problem and they become a political problem, sadly, only when they hit the front page.

A serious injury or death focuses attention on government (in)action and employer practices, thereby changing the political calculus around greater enforcement. As noted by one trade unionist:

No one wants to see children hurt at work. Especially when it is a case of the rules being insufficient or the rules being broken. Especially if the rules are broken. There is just no sane Albertan of any political stripe [who] is going to look at that and say that is a good thing and that status quo is good enough for young workers.

Yet the lack of data on teen employment complaints or injuries and the private nature of most employment issues may impede the development of a legitimacy crisis around teen injury. Historically, the former provincial Conservative government mitigated threats to its legitimacy via rhetorical strategies such as identifying the event as an unfortunate anomaly or threatening (with or without carrying out) additional educational or enforcement activities until the heat was off.

## Who Can Help Teen Workers?

Historically, Canadian workers have used unions as their main vehicle to mobilize and resist poor treatment. But the nature of teen employment (i.e., short-term and concentrated in the service sector) makes it hard for unions to effectively organize. According to a trade unionist:

I can't see any conceivable, practical way that [traditional union organizing] is going to happen in the kinds of industries where these abuses are most common — the food service industry and at the fringes of the service industry in general. Given the nature of their employment, which is quite often temporary in areas where there is not much union presence, and where, frankly, unions haven't figured out a way to function effectively in these high-turnover, dispersed workforce situations.

That said, some unions do organize in such sectors. For example, the United Food and Commercial Workers (UFCW) have a large presence in the grocery industry. Further, unions have made long-term commitments to funding labour-focused curriculum for schools (via the Aspen Foundation for Labour Education) and the provision of theatre-based labour education (via the Alberta Workers' Health Centre). The Industrial Workers of the World (the “Wobblies”) have also organized some employer-specific pickets and boycotts targeting “bad employers” in Alberta.

Parents seem likely to desire fair and safe workplaces for teens, but parents may be more interested in remedying specific problems faced by their teens than addressing systemic problems of noncompliance and non-enforcement. Parents may also have limited capacity to engage in mobilization, and both parents and teens may have low expectations. Parents, drawing on their own experiences, may also accept workplace injury and illegality as inevitable.

“Kids grow up listening to what mom and dad say happened at work. If they listen at all, the kids hear mom and dad saying, “This happened, it was crappy, it was the problem and we couldn't do anything about it.” Why would that lesson be lost on the kids?

—Not-for-profit staff member

Parents may also find advocating for better teen working conditions runs contrary to their broader interests as consumers. As one academic noted:

No one wants to pay more for food. ...We couch it in terms of what the market will bear, but really what we are saying is that we want that coffee shop to pay its workers crappily and, as a result, the only workers they can find are 16-year-olds who are happy working for \$9 an hour.

“ [A] young guy came up [and said], “I was really proud, I thought I was doing a really good job and [the employer] came over to my house and... he fired me in front of my parents.... Now my parents think that I am lazy.”

–Not-for-profit staff

Resistance also has both economic and social costs to teens. In addition to lost income, getting fired can affect teens’ self-esteem and their reputation among their friends and families. Teens may also be more vulnerable to employer manipulation. One not-for-profit staff member opined:

[A] 12-year-old we met ... had been working at a McDonald’s... said, “Yeah, I have been asked to stay late. But my boss, he kind of, like, needs me. I’m the best worker he’s got so I’ll help him out.”

His manager was ... asking this 12-year-old to stay, using this ... chummy persuasive technique to manipulate him to stay. And not only to stay beyond what employment standards allows, but to manipulate him to work with the deep fryer.

... Maybe that is not different than any other workplace where the boss tries to manipulate you. But knowing, developmentally, that young people are vulnerable and looking for that kind of reassurance, it is easy to take advantage of that.

A part of this vulnerability may stem from teens’ experience that, in virtually every other situation, adults tend to look out for teens’ interests. The outward similarities of employers, parents, and teachers as adults giving teens directions mask differing motives.

Theoretically, the seemingly endemic sexual harassment of female teens in the workplace may galvanize teens and parents to action and allow teens to tap into the expertise and resources of feminist and labour groups. The fact that such action has not yet occurred suggests otherwise.

Social media sites may offer teens a “place” to discuss workplace issues and/or organize region- or employer-specific direct-action campaigns over teen employment issues. Such campaigns may cause employers to modify their behavior, as well as generate public pressure on the state to enforce teens’ employment rights. Social media may also offer a low-cost way for teens and their parents to hear and discuss alternative framings of teen work. Yet the public nature of social media may place teens who speak out at risk of termination or being blacklisted.

## Recommendations: Improving Employer Compliance with Teen Employment Laws

The evidence that teen employment is often unsafe, unfair, and illegal is compelling. With the unexpected election of a New Democrat provincial government in May 2015, there may now be an increased willingness on the part of government to address employer non-compliance with teen employment laws. The four main policy tools available to the government are:

1. Additional worker and employer education
2. Increased monitoring of teen employment
3. Increased enforcement and punishment
4. Increased worker access to unions and unionization

### **Additional worker and employer education**

Awareness of the law is obviously a prerequisite of employer compliance with them. Linking awareness activities to existing administrative processes (e.g., as part of renewing a business license) might highlight the importance of employment laws to business owners. Education is also a secondary outcome of inspection activity, particularly in sectors where noncompliance is rampant.

Historically, worker education has focused on telling workers what their rights are, but has not taught workers how to effectively exercise these rights in the workplace. Alberta's educational efforts have also been few and sporadic. Heightened and systematic education in the school system would improve teen workers' knowledge of their rights and perhaps increase workers' propensity to file complaints. This could entail building on the curricular materials already supplied by the Aspen Foundation of Labour Education or the Alberta Workers' Health Centre's very successful theatre-based safety education.

### **Increased monitoring of teen employment**

The absence of good data about teen employment is a profound barrier to making good policy. At present, the government has no meaningful data on teen employment rates, injury or illegality. Requiring all employers to seek a permit before hiring adolescents would be an important and low-cost first step to developing evidence-based policy and enforcement mechanisms. Mandatory permitting would also provide the government with a timely opportunity to educate employers about their obligations to teen workers. Permitting data could then be used to develop robust data regarding employer compliance and teen injury.

### **Increased enforcement and punishment**

Employers' record of rampant noncompliance with Alberta employment laws demonstrates that education alone is simply not effective. Employers face a powerful economic incentive to minimize labour costs. Reducing the allure of violating teen employment laws requires a system of government enforcement that is able to identify and punish violators.

While complaint-based enforcement will remain necessary, a greater degree of workplace inspection (whether targeted or random) is required to create a real risk of violators being caught. This requires hiring more employment standards and health and safety inspectors.

Additionally, violators must also face the risk of meaningful sanctions if they fail to comply.<sup>54</sup> The present system mostly requires violators to comply with the law on a go-forward basis, thereby creating little incentive for employers to voluntarily comply with the rules. The cost of noncompliance can be heightened in various ways:

- **Sunshine lists:** The Government of Ontario publishes a monthly list of labour standards violators. Alberta already publishes a searchable archive of employers who owe wages and municipalities publish restaurant health inspection reports. Making available and publicizing easy-to-understand data on a regular basis about which employers are stealing workers' wages and endangering workers' lives will create a reputational cost for employer noncompliance. A sunshine list would also help teens and parents identify and avoid workplaces where illegality and injury occur.
- **Ticketing:** Alberta has recently introduced ticketing and administrative penalties in its health and safety system as an intermediate level of penalty between compliance orders and prosecution in the courts. Expanding this ticketing system to the employment standards regime and encouraging greater use of ticketing by government inspectors will increase the financial cost of employer noncompliance.

### **Increased worker access to unions and unionization**

Finally, it may be possible to increase employer compliance by making it easier for workers to access unions and unionization. Union representation reduces the barriers to individual workers seeking enforcement of their rights and thus reduces employer non-compliance.

Alberta's present labour laws make it difficult for workers to unionize. Legislative change, such as eliminating the requirement for certification votes when the majority of workers in a workplace are union members and providing for first-contract arbitration would reduce important barriers to



unionization that compound the organizational challenges of organizing and servicing bargaining units in the service sector, where most teens work.

Alternately, the government could enhance the ability of unions to support non-unionized employees to realize their rights. There are a variety of models operating in other provinces and countries. In some instances, unions act on behalf of non-unionized workers, including by bringing legal actions (including class action lawsuits) on employment law matters outside of the grievance arbitration process. In other instances, unions engage in community partnerships with non-state actors (such as ethnic communities) to educate and support workers accessing existing complaint systems. Unions have also been active in supporting groups of workers demanding that public agencies cease contracting with employers that have a history of violating workers' rights.

As yet, it remains unclear the degree to which Alberta's new government is interested in and able to increase the enforcement of workplace rights. While the compact that existed between the Progressive Conservative party and Alberta's business community has been destabilized, the new government faces many of the same structural pressures that the previous government did. Specifically, unfair, unsafe, and illegal teen employment is not widely viewed as problematic. Consequently, there is no widely recognized need for enhanced enforcement activity. Further, the benefits of enhanced enforcement are difficult for the average person to see (and thus provide little political benefit to legislators), while employer resistance to demands for compliance can entail substantial political costs.<sup>55</sup>

## Footnotes

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- 42 Babysitting and yard work are not identified as acceptable occupations for adolescents under Alberta's Employment Standards Code. The Government of Alberta has repeatedly indicated babysitting and yard work are not subject to the *Employment Standards Code* because such work tends to occur on a causal basis and (somehow) does not therefore constitute employment. This blanket exclusion is clearly specious.
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