



B.C. FEDERATION OF LABOUR
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Independent Review of the ITA's Role and Function

**Jessica McDonald,
Review Leader**

**Submission by
the B.C. Federation of Labour
Apprenticeship and Skills
Training Working Group**

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What we desire for ourselves, we wish for all. J.S. Woodsworth

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INTRODUCTION

BC labour organizations are primary stakeholders in the trades' training system. Labour and its employers have a long tradition of partnering to train the province's future generation of workers.

In most trades' apprenticeship, 75 - 80 percent of training takes place on the job. Finding the job placements for apprentices is the number one barrier to successful completion.

Training in project-to-project industries, like construction, has an extra barrier. Employment ends before the four-year-term of an apprenticeship can be completed. Labour union Joint Boards have successfully overcome the job placement barrier by using their multi-employer dispatch halls. When apprentices are laid-off, the dispatch call-out offers a link to new employers. The Joint Board sponsorship and dispatch system allows apprentices to seamlessly switch employers and continue their training on new projects.

Labour organizations work with employers to ensure apprentices learn the full range of skill sets to solve problems and turn blueprints into reality. A fully-trained 'Red Seal' worker can safely and efficiently

improvise, design, fabricate and install the components of their trade to produce profits for employers and society. 'Red Seal' certifications set a baseline standard for all employers. Inter-provincial 'Red Seal' standards allow workers to travel across jurisdictions to meet demand in local labour markets.

For apprenticeship to succeed, the work experience must be complimented by timely technical classroom instruction. Currently, 85 percent of the classroom study takes place at colleges and post-secondary institutions. These public institutions, staffed with instructors holding journey-level certifications, have the capacity to double their current registrations. Training programs are designed and facilities are in place. With more funding, BC's colleges and post-secondary institutions can accommodate demand for more technical training.

Training master workers requires a careful combination of four years' experience on-the-tools with technical classroom training at annual intervals. There is no short cut, but improvements can be made. The process can be enhanced by adopting the best practices of the labour's proven contributions with appropriate resources and support.

In this submission we highlight 12 priority areas to improve BC's trades training system.

- Shared Governance
- Apprenticeship Advisors
- Compulsory Certification
- Apprenticeship Ratios
- Full-Scope Training
- Returning the ITOs to the ITA
- Funding Formulas
- Procurement Policy
- Essential Skills
- Foundation Courses
- Grant/Levy System
- Challenges

SHARED GOVERNANCE

Rationale: Labour organizations in partnership with their employers are the largest single sponsor of BC's apprentices who complete 'Red Seal' training.

Construction union Joint Boards alone account for a third of 'Red Seal' completions. The Building Trades' unions invest over \$13 million supporting over 100 staff to oversee training programs. Union staff are involved in every aspect of trades training starting from curriculum development, as administrators who select apprentices and monitor their progress, as dispatchers to link apprentices to employers, as classroom instructors who are trade certified, as support for apprentices who need remedial essential skills training and in the provision of subsidized technical training and exam preparation. Despite the comprehensive role of labour in trades training, there is only one labour representative on the ITA Board. Only two of six ITOs invite labour to participate on their Boards.

Recommendation: New legislation mandating a four pillar partnership approach to the ITA Board; including business, labour, educators and government. Equal representation between business and labour to be bolstered with representatives from educators and the Province. We also need regulations requiring that all ITA Board directors be authorized decision-making representatives from their organization, i.e., not legal counsel or CGAs. As a matter of policy, all candidates for the ITA Board must have a good understanding of and background in apprenticeship and trades training.

By legislation, the principle of shared governance would extend to the ITA's sub-organizations (ITOs, committees and other ITA advisory bodies).

APPRENTICESHIP ADVISORS

Rationale: The ITA's Apprenticeship and Sponsor Supports Survey (June, 2013) is the latest of many reports attesting to the need for advisor support to guide apprenticeship training. The ITA's commitment to hire 15 advisors over three years is an important first step but is still lacking. The 15 advisors are needed now and more are required. More than 50 percent of learners who complete foundation (pre-apprenticeship) training fail to continue their training. Without advisors, the investments in pre-apprenticeship are wasted.

Alberta's AIT staff of 190 not only provides administrative support from 12 regional offices across Alberta, they are responsible for monitoring and supporting sponsors' job sites.

Recommendation: A commitment from government to sufficiently fund an appropriate number of apprenticeship advisors providing resources as required to service apprentices in all regions of the province. Advisors need resources to:

- Monitor individual apprentices' progress to mitigate delays ensuring timely technical training. BC Advisors need authority, similar to Alberta staff, to enforce the limit on the maximum period between each level of technical training to 15 months.
- Regional Offices in Prince George, Terrace, Dawson Creek, Burnaby, Surrey, Nanaimo, Campbell River, Victoria, Kamloops, Kelowna and Nelson.
- Advisors should be responsible for monitoring and evaluating employers or the indenturing entity to ensure appropriate workplace resources and standards for mentorship with authority to assist sponsors meet this standard.

- Advisors should have the authority required to ensure every apprentice experience involves full scope of trade training.
- Advisors duties should include assisting apprentices' search for employers and tracking apprentices' success for statistical review and policy development.
- Advisors should be sensitive to the need and engaged in recruitment of non-traditional groups to apprenticeship training; including First Nations, Women, Youth and the Disabled.

COMPULSORY CERTIFICATION

Rationale: In BC, the ITA does not require compulsory certification to practice a trade in the province. An important incentive to complete apprenticeship is the requirement to hold a certification. The highest completion rates in BC are in trades made compulsory through other authorities such as WorkSafeBC or the BC Safety Authority. Compulsory certification is a feature of trades training and standards across the country. Alberta's AIT requires compulsory certification in 21 trades. In Ontario, the legislation governing apprenticeship training falls under the Ontario College of Trades, the body responsible for mandating compulsory trades. In Ontario, compulsory certification is required in 11 trades.

Compulsory certification in all highly-skilled trades will enhance public safety and quality for clients.

Recommendation: Enact legislative changes, with a transition plan, to require ITA regulation over compulsory certification and its enforcement for all highly skilled trades.

APPRENTICESHIP RATIOS

Rationale: Apprenticeship ratios ensure that apprentices are surrounded and trained by experienced 'Red Seal' endorsed mentors. BC is the only jurisdiction in Canada with no apprenticeship/journey-level worker ratios ensuring mentorship from trades certified workers. In BC, the Joint Board trainers are the only authority requiring ratios, usually one apprentice for each three journey-level workers. The Electrical Joint Training Board has the highest ratios: one-to-one. Ratio rates are currently tracked across Canada in the Ellis Chart.

Recommendation: Legislation mandating apprenticeship ratios in all “Red Seal” trades to ensure quality experiential training.

FULL-SCOPE TRADES TRAINING

Rationale: Full scope 'Red Seal' endorsement is another important incentive to complete trades training. Full scope of trade certifications allows workers to market their skills across the country. Joint Board's high completion rate is due, in part, to its commitment to 'Red Seal' endorsement.

Short-cutting the apprenticeship tenure with modular certifications is fragmenting training and does not meet employers' demand for workers with ability in all aspects of a trade. Examples of fragmented modular certificates include: Residential Framing Technician or Ironworker Rebar Placer. The Residential Construction ITO (RCITO) failed for this reason.

Recommendation: End modular certifications for partial components of a trade. Returning full-scope value to certifications will provide stability and standards in trades' labour markets making production more efficient and profitable for employers.

RETURNING ITOs TO THE ITA

Rationale: For the last ten years, the ITA has relied on employers' leadership role in training through Industry Training Organizations (ITOs). These business-led bodies were to fund and take responsibility for trades training. After all this time, the ITOs are still totally dependent on government funding. The ITOs are not independent from the ITA. CITO, the largest ITO is responsible for 75 percent of "Red Seal" trades and not yet raised "Red Seal" completions as required. While some aspects of the ITOs have worked, it can be done better.

Recommendation: To better co-ordinate the delivery of apprenticeship services for employers and learners, we recommend that the ITOs be brought under the single roof of the ITA. The ITOs would continue their work as departments within the ITA focusing on curriculum development, setting equivalency standards, etc.

FUNDING FORMULAS

Rationale: Designated training providers offering foundation programs, all levels of technical training through to Level 4, and those investing in equipment and facilities have faced increased cuts. Accreditation of new training providers should be tied to proven records of assisting apprentices in their search for sponsors providing links to employers and instructors who hold journey-level certification.

Recommendation: Restore full funding to training providers with proven track records of linking apprentices to sponsoring employers and education institutes whose instructors are journey-level 'Red Seal' endorsed and certified. The ITA should boost accountability measurements to improve the quality of accredited training providers who receive funding.

PUBLIC PROCUREMENT POLICY TO SUPPORT APPRENTICESHIP TRAINING

Rationale: Public infrastructure projects provide important opportunities for apprenticeship training. Additional training opportunities exist in maintenance operations at public buildings and facilities. As an employer, government can play a direct role in supporting apprenticeship opportunities. Public employers are also in a unique position to promote trades training opportunities to non-tradition groups in trades' occupations: First Nations, Youth, Women and the Disabled.

Public sector unions are ready to partner with government to provide more apprenticeship opportunities. By not providing training opportunities, governments are actually poaching training investments from private-sector employers who do train.

Recommendation: Criteria requiring winning tender bidders on all new provincial and local government-funded infrastructure construction to employ apprentices (including all crown corporations, hospitals, schools and universities). Tender bids requirements to include targets to recruit non-traditional groups to apprenticeship.

A commitment by the province and local governments to engage with public sector unions and partner on apprenticeship training so that maintenance operations at hospitals, schools, universities, colleges and crown corporations provide apprenticeship employment to the maximum possible.

TARGETED ESSENTIAL SKILLS REMEDiation

Rationale: Many apprentices have not acquired basic Essential Skills before beginning trades training. We need to engage our K-12 system, parents and society

to value trades training and teach Essential Skills. New Canadians, those with foreign credentials in need of ESL upgrading and older adults beginning apprenticeship have unique Essential Skill needs.

Intervention to address math and literacy skill deficiencies with targeted customized remedial work for individual learners is a proven strategy to increase success rates in trades training. The ITA attempt to address essential skills deficits is not working. The “self-help” approach on the ITA website is difficult to navigate for those with literacy and math deficiencies.

SkillPlan, a unique privately-funded union/management initiative provides a model for remedial Essential Skills interventions. Other recognized providers might also be able to support Essential Skills, i.e., the RTO uses TOWES an Essential Skills program.

Recommendation: Greater engagement with the K-12 system to provide learners with Essential Skills prior to entrance to the work place. Initiatives must be undertaken to engage the Ministry of Education to ensure that all high school graduates have the necessary Essential Skills to successfully follow whichever post-secondary path they choose.

In the interim, the ITA should work directly with SkillPlan and other approved trainers, i.e., colleges, to access resources and trained staff to meet the unique needs of every apprentice requiring hands-on Essential Skills support.

FOUNDATION COURSES

Rationale: Prior to the ITA's reduction of Foundation course hours there was no consultation with colleges and post-secondary institutions. These institutions have made significant investments in program design. The ITA's hour reductions have wasted some of these investments.

Recommendation: Full consultations with College instructors and administrators to restore value in program design of Foundation courses. Further, we recommend that funding for Foundation courses fall under the Ministry of Advanced Education.

GRANT/LEVY SYSTEM

Rationale: Less than 15 percent of employers hire apprentices. Employers who don't hire apprentices depend on the training investments of others. Freeloading employers poach trained workers to meet their needs. In Quebec, all employers who can reasonably be expected to train apprentices contribute a nominal per-hour levy to the provincial training system. Those employers who do hire apprentices can apply for monies to offset the cost of training.

Recommendation: Institute a grant/levy system of financial incentives to encourage more employers to invest in training.

CHALLENGES

Rationale: The ITA increasingly relies on challenges, with a written multiple choice test in order to boost the number of "Red Seal" endorsed certified workers. This is a patchwork and inefficient approach.

It's patchwork because the evaluation of the experiential component is not consistent across trades. With only a few exceptions, there is no practical assessment of the scope and limitations of a challenger's work experience. Even in the exceptions, i.e., ITA's pilot competency-based assessment for heavy duty mechanics and cooks, the practical assessment is hit and miss and prohibitively expensive.

Another patchwork element is that challengers' experience may be restricted to a single sector of the industry, i.e., residential. They are unable to perform in industrial work settings. Employers don't know the



value of a challenged certification until the worker is hired on for the job. In BC, the value of “Red Seal” has been watered down by challengers.

A further inconsistency is the number of challenges by trade. In carpentry, over 50 percent of all new certifications are now coming from challenges.

Challenges are inefficient because test challengers must prove one-and-a-half times the experiential work hours required for an ordinary apprenticeship. It often takes 10-12 years to accumulate enough experience in order to challenge. This compares to a structured apprenticeship which takes between four-to-six years.

Another concern arises from the Ministry of Jobs, Training and Skills Development RFP investigation of lifting barriers to Foreign Qualification Recognition for the LNG sector. Building codes, safety systems regulations, mining regulations, WorkSafeBC regulations are only a few of the many regulatory bodies that could be impacted by fast-tracking FQR. We urge the Ministry to work with Labour expertise and conduct a full review of research available, before moving ahead with FQR for the LNG sector.

Recommendation: Challenging should not be promoted as the path to trades certification.

CONCLUSION

Labour has a long history of partnership with employers in delivering trades training, and we will always play a key role in mentorship and training of future generations of workers. We look forward to engaging with government to deliver on the twelve issues identified in this Submission:

- Governance
- Apprenticeship Advisors
- Compulsory Certification
- Apprenticeship Ratios



- Full-Scope Training
- Returning ITOs to the ITA
- Funding Formulas
- Public Procurement
- Essential Skills
- Foundation Courses
- Grant/Levy System
- Exam Challenges

**SUBMITTED ON BEHALF OF THE BCFED
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