A BRIEF PRESENTED TO THE SELECT COMMITTEE
ON PENSIONS APPOINTED TO ENQUIRE INTO AND
REVIEW THE RECOMMENDATIONS OF THE REPORT
OF THE ROYAL COMMISSION ON THE
STATUS OF PENSIONS IN ONTARIO

THE ONTARIO COMMITTEE ON THE STATUS OF WOMEN AUGUST, 1981

Introduction

The Ontario Committee on the Status of Women is a volunteer organization which was founded in 1971 to press for changes in the status of women in Ontario. Our membership comprises more than 400 individuals and groups throughout the province; we are funded solely by membership dues.

In 1977 we submitted a brief to the Royal Commission on Pensions and in 1978 we spoke to the Commissioners on the need for pension reform for women.

Then, as now, we see two major needs. One is to increase the income of elderly poor women living in Ontario today; the other is to provide a pension system which meets the needs of women for a decent retirement income.

The need to alleviate the plight of elderly women

We agree with the recommendations of the Commission that steps be taken to provide an adequate level of retirement income for single persons and married couples age 65 and over. We know that increasing the basic payment levels of the Guaranteed Income Supplement (GIS) is a widely favoured form of increasing the retirement income of the elderly. However, we suggest that the means testing attached to applications for the GIS is a drawback to this solution.

We agree with the Commissions's recommendation that Old Age Security (OAS) be taxed back for those persons having a net taxable income of \$30,000 in the year.

We strongly endorse Recommendation 21 that "until changes can be made to increase the GIS as recommended, the Government of Ontario should increase without delay the payment for GAINS to bring single persons up to the adequacy level of 'available income' recommended for the year in which the increase is made".

We strongly endorse Recommendation 22 urging the government to recognize that single persons over 65 need about 60 percent of the income required by a married couple. For the poor, elderly, single women in this province, implementation of this principle is the difference between humiliation and dignity.

Some Changes in the Pension System

We also wish to address the committee on the following issues related to changes in the pension system in Ontario: the Provincial Universal Retirement System (PURS), Survivor Benefits, Unisex Mortality Tables and the Drop-Out Provision to the Canada Pension Plan (CPP).

The Provincial Universal Retirement System (PURS)

The Ontario Committee on the Status of Women supports the concept of a diversified retirement income system. We recognize the role of government in assuring a basic level of retirement income through provision of the OAS and the CPP; we recognize the role of the private pension plan provided by employers in conjunction with employees and we recognize the role of the individual to contribute, when able, to his/her retirement income.

Women in the workforce have not been well served by private pension schemes. Although we appreciate some of the problems raised by PURS, we see this proposal as an effective way to assure women a decent level of retirement income. The earlier vesting, the portability and the mandatory planning for retirement which the PURS proposes would provide the kind of pension system which women in Ontario need.

We assume that if a provincial mandatory scheme is not politically supported there will be some mandatory scheme for employees that would assure the same provisions as the PURS. We look forward to hearing the Committee's views on this issue.

Survivor Benefits

We endorse Recommendations 53 and 54 which deal with the issue of survivor benefits in employment pension plans. Considering the erosion of pension benefits by inflation, however, we would recommend that the spouse should receive as a pension 80 percent of the pension to which the employee would have been entitled rather than 60 percent.

Unisex Tables

We fully endorse Recommendation 106 that, "The Government of Ontario should take steps to ensure that all annuities purchased for money-purchase pension plans and RRSPs as well as for PURS, if adopted, are calculated without regard to the sex of the annuitant on the basis of unisex mortality tables."

The insurance and pension industry have argued against using unisex mortality tables in the calculation of monthly payments from annuities for a long time. However, many of these arguments are now being challenged by anti-discriminatory legislation, by precedents in some American courts finding against the use of separate mortality tables and by analysis of the risks and subsidies in any benefit plan.

The Drop-Out Provision in the CPP

We have been urging the Government of Ontario to change its position on the drop-out provision to the Canada Pension Plan since 1977. In 1979 we again urged the Premier and members of his cabinet to adopt the drop-out provision.

We strongly endorse Recommendation 32 that "The Government of Ontario should approve the amendment of the CPP /or the child rearing drop-out provision as now legislated, to take effect without delay."

Conclusion

Women in Ontario have long been the victims of an inadequate pension scheme.

Less than 25 percent of women in the labour force contribute to private pension plans.

Women make up 71 percent of the part time labour force and the part time labour force in not covered by private pension plans.

Women are removed from the labour force to engage in the important activity of child rearing and cannot include those years of labour when calculating their lifetime average earnings; they are penalized for having raised the next generation.

Women earn 54 percent of what men earn and often lack the opportunities to acquire good jobs with adequate salaries and benefits.

The Ontario Committee on the Status of Women is pleased that the Report of the Royal Commission on the Status of Pensions in Ontario recognizes the role of women in the labour force, as child raisers and as persons needing access to a much better pension scheme.

We look forward to discussing our responses with the Select Committee on Pensions.

PRESENTATION TO THE

PARLIAMENTARY TASK FORCE ON PENSION REFORM

BY

THE ONTARIO COMMITTEE ON THE STATUS OF WOMEN

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INTRODUCTION

The Ontario Committee on the Status of Women welcomes this opportunity to present a brief to the Parliamentary Task Force on Pension Reform. We commend the Government of Canada for producing the Green Paper "Better Pensions for Canadians" and for including the separate booklet "Focus on Women".

However, we deplore the fact that no action was taken to remedy the plight of the present elderly. This plight has long been recognized and action is long overdue. We strongly urge that "resources permit" (p25) in the immediate future.

2. THE ONTARIO COMMITTEE ON THE STATUS OF WOMEN

i) Organization

The Ontario Committee on the Status of Women is a volunteer organization which was founded in 1971 to press for improvement in the status of women in Ontario. Our membership is comprised of more than 400 individuals and groups throughout the province. We are funded by membership dues.

The women who make up our membership are a microcosm of women in our society today. Their ages range from 18 to 80. Some are married, others are not. Some are single parents, others are widowed or divorced. Most work in the paid labour force in a variety of occupations. Several work as professionals in the field of employee benefits and several are well known lawyers, writers and academics who speak out on women's issues.

ii) Work on Pensions

Pensions and benefits have always been an important issue for The Ontario Committee on the Status of Women.

- In 1973, we presented a brief to the Ontario Task Force on Employee Benefits and in it, addressed the question of discrimination in fringe benefits.
- In 1977, we presented a brief to the Royal Commission on the Status of Pensions in Ontario.
- From 1980 to 1982, members of the Ontario Committee on the Status of Women worked on the National Action Committee on the Status of Women's Pension Committee.
- In 1981, we presented a brief to the Ontario Select Committee on Pensions (formed to review the recommendations of the Royal Commission).

- In 1981, we sponsored a public seminar on Pensions for Women in Toronto.
- In 1982, we co-sponsored a public forum on Pensions at the St. Lawrence Centre in Toronto.

In addition to these activities, our Pension Committee has spoken to many groups in Ontario on Pension Reform for Women.

We have also issued news releases, made comments to the media, appeared on radio and television, and written articles on the subject of pension reform.

From 1977 to 1983, the Ontario Committee lobbied the Ontario Government to change its position on the drop-out clause in the Canadian Pension Plan.

We did this through meetings with Premier Davis and his cabinet, through meetings with women's groups in the province and through speeches, articles and news releases.

Although we are relieved and pleased that the Ontario Government has dropped its veto to this provision in its May, 1983 Budget, we must confess to a degree of frustration that the positive change to the Canada Pension Plan was so long in coming.

3. COMMENTS ON "HIGHLIGHTS OF PROPOSALS FOR REFORM"

Our membership consists mainly of women in the paid labour force. For this reason, we have chosen to concentrate our comments on pension reform from the viewpoint of women who are in the paid labour force on the same basis as men. That is, they expect to work for 40 to 47 years between the ages of 18 and 65. However, some of our comments will refer to issues of greater concern to women whose attachment to the paid labour force is full-time, but somewhat intermittent, to women who work part-time and and to women whose attachment to the paid labour force is minimal. Our comments on the "Highlights of Proposals for Reform" outlined in "Better Pensions for Canadians" are as follows:

Vesting

We recommend full and immediate vesting with locking in of contributions. However, we find two years acceptable for a phase-in period. We believe employers should be required to pay at least half the vested benefit for an employee who terminates her employment.

Portability

We support the introduction of a Registered Pension Account to facilitate portability.

Registered Pension Account

We would support the use of the Registered Pension Account by small businesses.

Eligibility

We support one year of service and age 25 as employer sponsored pension plan entry requirements.

Credit Splitting

We would like to see uniform provincial legislation that would allow for the splitting of employer sponsored pension plan credits between spouses on marriage breakdown.

Joint & Last Survivor Annuities

We believe this should be the normal form of annuity, and that the survivor should receive at least 60% of the initial benefit.

Inflation

We believe in principle that incomes in retirement should be protected against inflation. However, we share some of the concerns being expressed with regard to the 'excess interest' method.

4. FUNDAMENTAL INEQUITIES IN WOMEN'S INCOME

We wish to stress that even if all of the above reforms were effected, women's pensions would still be considerably less than those of men. "Better Pensions for Canadians" points out, "the average female employee earns 58% of the average male's salary," and "women receive smaller pension benefits as a result." Unfortunately, the Green Paper fails to draw the obvious corollary that equal pay for work of equal value and equal opportunity would constitute a significant part of the solution. We are aware that up until now, those concerned with pension reform have consistently seen this matter as an issue outside of their terms of reference. We realize that the issue of equal pay for work of equal value falls within provincial responsibility, and because of this, the Task Force is somewhat at a disadvantage. Nevertheless, we wish to go on record as urging you to acknowledge the relationship between these issues.

In our opinion, if you fail to do this, you should consider the principles presently underlying the legislation on pensions, i.e.:

- a reasonable level of income;
- fair opportunities to provide for retirement;
- avoidance of serious disruption of pre-retirement living standards;

in terms of different replacement ratios for men and women. By this we mean one level for men and another higher level for women

The argument put forward by the pension industry (i.e., plan sponsors, insurance companies and consultants) that income needs in retirement tend to be less, cannot be truly applied to women, for example, the assumption that most people have acquired property by retirement age. Because women work for low wages all of their working lives, women have less opportunity to save and invest. Also, the necessities of life in retirement have similar costs for both sexes, but these costs for women represent a higher proportion of a lower pension.

5. SEX DISCRIMINATION IN PENSION BENEFITS/UNISEX TABLES

In our opinion, the fundamental inequity in women's earnings and opportunity has given rise to the demand for unisex tables. Women view the use of separate mortality tables as further discrimination against them, making already low and sometimes inadequate private pensions even lower.

Those of us who work in the life insurance industry are familiar with the objections to unisex tables. We are also aware that some actuaries are suggesting that the industry will develop annuity tables based almost totally on female mortality rates if the industry is forced to use unisex tables. Such tables would not improve the level of women's pension income, would increase the cost of men's pension income and would, presumably, add to the insurance companies' surplus income.

We understand also that, if genuine unisex tables were developed (that is, tables that assumed a realistic split between males and females), they would, apart from anything else, complicate the administration of pension pians during the fund accumulation periods. In order to avoid this and the use of unisex tables in employer sponsored Money Purchase plans, we would like to suggest that the employer picks up the cost of the mortality differential when the employee leaves or retires. If the employer were responsible for this cost under a Money Purchase plan, it would be consistent with the employer assuming responsibility for the cost of the mortality differential under a Unit Benefit plan. It seems to us that, from an administrative point of view, the Money Purchase plan could continue to function as at present, except that the employer would establish a separate interest-bearing "savings" fund. Each time an annuity purchase was required for a retiring female employee, or she was credited with vested contributions when leaving, the mortality differential to equalize the benefit to the amount a male would receive at a similar age with similar contribution accumulations, could be taken from the "savings" fund as a lump sum.

EXPANDED EMPLOYER SPONSORED PLANS VERSUS AN EXPANDED CANADA PENSION PLAN

As the Task Force is aware, a large number of women work part time and/or for businesses with no employer sponsored plans. Also the proportion of women in this environment is higher than the proportion of men. In spite of discussions on pension reform that have taken place over the last few years, the private sector has not responded positively to this situation to any significant extent. Although much of the reform should perhaps be left to

the private sector because of its ability to exercise more flexibility and control, the private sector seems to lack the inclination to reform. Legislated pension plans would appear to be necessary and for this reason, many women favour an expansion of the Canada Pension Plan to insure that they would have greater access to better pension benefits.

We are pleased, as we have stated, that Ontario has withdrawn its veto to the child rearing drop-out provision in the Canada Pension Plan. We would like to suggest that provincial legislation with regard to periods of maternity leave of absence be extended so that the employer not only has to keep the employee's job open for her, but also has to maintain contributions to her employer sponsored pension plan. Again, this is not a provision we see evolving of itself in the private sector.

COST OF PENSION REFORM

If reforms to the pension system are introduced, we recognize that there will be an additional cost to the country. Increased contributions to either the Canada Pension Plan or to employer sponsored plans will presumably be reflected in higher costs for goods and services. However, if reforms to the pension system are not introduced, we believe that there will still be an additional cost to the country, in as much as provincial supplements and welfare payments will have to be available to support the women unable to achieve financial independence under the current social economic system.

We do not share the apparent fear of the private sector in the event that too much capital should flow to the control of government. If pension reform results in the major portion of future pension fund accumulations flowing to government, we would recommend a body consisting of government, industry and labour representatives to direct the investment of such capital. In any event, we believe some consideration should be given to directing pension fund capital to the development of secondary industry in this country.

8. HOMEMAKERS IN THE CANADA PENSION PLAN

The question of homemakers' contributions to the Canada Pension Plan is a complex one, and we appreciate the analysis of this question in the booklet "Focus on Women".

As we stated earlier in this brief, the majority of women whom we represent are in the paid labour force. They are doing work both in that force and at home.

Furthermore, 72% of women in Ontario are now in the paid labour force and there are no indications that these numbers will decrease; indeed, they may increase. In view of this, we set as a priority, better pensions for women in the paid labour force.

We agree with the principle of pensions for homemakers in their own right, but we support the idea in the booklet "Focus on Women", that this can be achieved by Better Pension Splitting proposals for public and private plans, by recognition of pensions as family assets and by restructured benefits in the Canada and Quebec Pension Plans. We are concerned that the issues of homemakers' pensions could stall many of the other issues of pension reform for women. We urge the Task Force to give serious consideration to the issue of homemakers in the Canada Pension Plan, but not to let this issue detract from urgent pension reform in general.

PRIVATE SECTOR ATTITUDES

We have some concern with private industry's oft repeated position that the employee should assume more responsibility for his/her own pension fund accumulation. Given the present high level of unemployment, and the fact that the average woman earns 42% less than the average man, we do not find this a very realistic stance. Similarly, private industry needs to be reminded that there are more women's issues than unisex tables, survivors benefits and participation of housewives in the Canada Pension Plan.

10. CONCLUSION

As we mentioned in the Introduction, we are pleased to see that women's issues finally received particular attention in the Green Paper. However, we regret that the necessity for this focus and the fact that we have to constantly remind governments and business that women make up 51% of the population and 41% of the paid labour force. It is not appropriate to view the world from the male perspective only. Women's issues should not be considered as an afterthought. We look forward to recommendations on pension reform from the Task Force that integrate our issues and concerns.

SUMMARY OF CONCERNS EXPRESSED TO THE PREMIER AND CABINET MINISTERS OF ONTARIO BY THE ONTARIO COMMITTEE ON THE STATUS OF WOMEN -- April 17, 1975.

SUBJECT: LABOUR LEGISLATION

BASIS FOR CONCERN -- THE SITUATION OF WOMEN IN THE LABOUR FORCE

- --The female participation rate in Ontario's labour force is now over 40%, and we can expect it to continue climbing.
- --Women continue to be concentrated in low-paying, relatively unskilled jobs, especially clerical, service, and sales areas.
- -- The average hourly wage rates for male and female workers have consistently been widening.
- --General conclusions to be drawn from labour statistics are:
 - --Women earn only 60% of what men do, working full-time.
 - --1/2 of this is due to being paid less for the same job.
 - -- The other 1/2 is due to being in "traditionally female occupations".
 - -- The current Employment Standards Act is not providing real equality in pay for women.
- --Furthermore, the current so-called "economic recession" brings new worries.
- --Across the board percentage wage increases are putting women's salaries further behind men's, on the average.
- --Now in Ontario, the unemployment rate for women is beginning to rise even when the rate for men declines.
- -- The economic situation of women is vulnerable.
 - --3/5 of Canada's welfare recipients are women.
 - --3/4 of Ontario's single-parent families are headed by women.

WHAT IS NEEDED

--We need an amendment to the Employment Standards Act to provide equal pay for work of equal value, to be appraised by job evaluation on the basis of skill, training, effort, responsibility, and working conditions, within a single establishment. This is the principle espoused by the International Labour Office's Convention 100, which Canada ratified in 1972 after federal consultation with the provinces.

WHAT EQUAL PAY FOR WORK OF EQUAL VALUE WILL MEAN

- --Remuneration will be based on the value of the job performed. That is, a female employee should be able to challenge the basis on which she is paid by comparing the value of her job with that of a man in the same establishment performing a job judged of equal value by criteria of skill, effort, training, responsibility, and working conditions.
- --For proper enforcement, we need government-appointed job evaluators to respond to individual complaints under such legislation.
- --We are <u>not</u> requesting a system of job evaluation for the whole employment sector; we are speaking only of jobs within the same work place.
- --This will not require a new set of government employees. The enforcement machinery is already there in the form of existing methods of job evaluation and investigation by employers and government.
- --True equal pay for women will not be achieved unless we have this legislation which can have effective enforcement. (Laws providing for equal pay for "substantially the same work" are proving unenforceable in other jurisdictions.)

LABOUR LEGISLATION (continued)

CONCLUSION -- THE IMPORTANCE OF TRUE EQUAL PAY FOR WOMEN

- --Remuneration based on the value of work performed will make a great contribution towards the cause of equality for women:
 - --In a society where occupational remuneration has much to do with status, true equal pay for women will promote the self-worth of our women. Our whole society will benefit. Employers should find it to their own gain in efficiency and productivity.
 - --Ours is a society where women are more often working out of economic necessity, either to supplement an inadequate family income, or because they are increasingly the economic heads of households. We do not make distinctions in the pay rates of men on the basis of such factors as family size, spouse's income; why should we then pay women less than men for such reasons? We say: pay employees on the basis of the value of the job performed. Leave income redistribution to our progressive income tax structure. It is important to accept in legislation the principle of equality of remuneration for women.
- --In International Women's Year, we are calling on the Ontario government to amend its labour legislation. What we need is the principle of equal pay for work of equal value in practice as one of the cornerstones of equality for women in Ontario.

OUESTION --

What steps is the government prepared to take to enforce its commitment to equality of women in the work force?

THE ONTARIO COMMITTEE ON THE STATUS OF WOMEN

REMARKS TO THE ONTARIO GOVERNMENT'S INTER-MINISTERIAL COMMITTEE

June 19, 1978.

The Ontario Committee on the Status of Women is a Toronto-based group of women from many different occupations and backgrounds. The founders started it in 1971 to press for implementation of the Royal Commission Report's recommendations about legislation and policies under provincial jurisdiction. The Ontario Committee is an affiliated member of the National Action Committee on the Status of Women. In matters of federal jurisdiction, we act through NAC.

I would like to request that a list of the members of the Interministerial Committee be made available to the participating women's groups. I would also like assurance from the Director of the Women's Bureau that the report of the Committee, when it is ready, will be widely distributed to consulted groups and the public at large.

To outline what I intend to cover: my remarks will be based on re-reading the 1973 green paper. I shall survey the areas covered, Ministry by Ministry, pointing to what our organization sees as ongoing problems, some more serious than others. Occasionally I shall raise questions, not to ask for an immediate reply, but to stimulate discussion later. In passing, I shall mention those concerns which have had most attention from our organization, and finally, I shall set out what I see as our priorities in the forseeable future.

Northern Affairs -- We remain concerned about services to women in isolated situations, whether rural or urban. We note the excellent task force report produced by women in northern British Columbia -- in particular, its description of company towns -- and recommend it to you.

Attorney-General's Department--The OCSW has been very active in the development of the revised family law. We are now monitoring decisions involving judicial discretion under it.

We are also concerned about police forces--in particular, their hiring of women and other minority groups, and their policies in dealing with domestic disputes.

<u>Culture and Recreation</u>--It has been encouraging to see the Human Rights cases involving girls and sports, but much remains to be done here, some in conjunction with education, if we are to reverse the deplorable situation of the lack of fitness in our younger women. There will have to be a more effective attack on sex stereotyping with regard to physical education.

Education -- We are encouraged to hear that \$8 million has been added to apprenticeship programmes. We would now like some assurance about the amount of that which will go to prepare women for non-traditional jobs currently in demand in our labour market. Obviously, this will have to be backed up by top-notch guidance counselling.

The other matter of our concern here is the hiring of teachers. Disturbing trends are emerging in the hiring rates of new teachers, as males pull ahead. We do not like to see women losing ground in occupations where they have traditionally been active and relatively secure.

ONTARIO COMMITTEE ON THE STATUS OF WOMEN: Remarks to the Ontario Government Inter-ministerial Committee, continued

Colleges and Universities -- The Plan of Action proposed that community college programmes aimed at women be strengthened, but last year we saw Humber College's Centre for Women close. It would seem that constraints are the order of the day. We hope that the community colleges are responding to shifts in the labour market, and adjusting women to these.

Consumer and Commercial Relations—There may be credit guidelines in place, but women still frequently complain to our organization about their treatment at the hands of the businesses which, apparently sincerely, endorsed those guidelines. These women are left with no legal muscle behind them—it usually means carrying on a protracted correspondence, hoping to embarrass the company. Women also require better advice and financial aid to start small businesses.

This Ministry's anti-discrimination legislation (on buying and selling-Bill 112) seems to have been drafted without thinking of sex and marital status as prohibited grounds for discrimination. We must then ask, who is responsible, within each Ministry, for monitoring draft legislation to avoid this ongoing sexism? I would like some discussion on this.

<u>Labour</u>--We now turn to the areas of more serious concern, if we can think of the previous ones as less important!

There are 4 main areas under this Ministry's jurisdiction that receive OCSW attention:

1) Revision of the Employment Standards Act to make equal pay for work of equal value the new standard. This involves, furthermore, other changes in the law to strengthen enforcement procedures. The "equal value" concept was raised by the green paper, but has not been exactly trumpeted by the Ontario Ministry of Labour. I would be interested to know if the proposed study of the implications of equal value in and by the Civil Service Commission has been carried out, and if so, when can we in the public hear its results?

The OCSW is now preparing a brief to the Minister of Labour, on the subject of equal pay for work of equal value, as well as affirmative action and contract compliance in enforcement.

- 2) Problems of unemployment. Since women now consistently have a higher rate of unemployment than men, what is being done to cut into the situation? Here, there is a link with the Ministry of Colleges and Universities, since the green paper recommended strengthening community college programmes for women, as I have mentioned. There is a further link with the Ministry of Culture and Recreation, since educational TV could be beamed at homemakers interested in re-entering the labour force.
- 3) Pensions and benefits. The OCSW has documented the myriad problems in this field, in our recent brief to the Royal Commission on the State of Pensions in Ontario. Basically, it is a question of the pension system constructed on a model of male career patterns, with discriminatory attitudes buttressing the outdated structure.
- 4) Wage rates. Here, the OCSW is opposed to the trend to build differentials for tip-earning workers into the minimum wage. We believe that this undermines the principle of the minimum wage, and hits women hardest.

Related to this is the position of domestic workers. Has the study of them mentioned in the green paper been done, and if so, may the public have the results to consider?

ONTARIO COMMITTEE ON THE STATUS OF WOMEN: Remarks to the Ontario Government Inter-ministerial Committee, continued

Health—The Status of Women Council's recent booklet capsulized the issues here. Our organization is now in the final stages of a brief to the Minister of Health, centring on our principal concern, which is conception control. In looking over our brief from 1975, I was disheartened, to say the least: the same brief could go forward today—there has been virtually no movement here. The OCSW has canvassed the local health boards, and has found that no standardized programme is in effect. We are left to ask, how has the Ontario Government responded to federal initiatives in family planning? We can only doubt that there is real commitment to such a programme, at whatever level.

I am also reminded that this month, we await the Ontario Government committee on the Badgley Report's response, about the policy on abortion in Ontario.

The question of joint federal-provincial jurisdiction is a serious one, and leads me to

Treasury, Economics, and Inter-Governmental Affairs--The OCSW has been pressing for a couple of years to have this Government accept the drop-out provision in the Canada Pension Plan amendments. We remain unconvinced by the Ontario Government's economic arguments.

There are other problems for TEIGA as well, having to do with the need for taxation and pension reforms, in particular. For instance, the green paper mentioned the matter of farm wives receiving consideration via deductions on their husbands' income taxes; has this Ministry championed these women in talks with the federal authorities?

But the area of most concern must be the responsibility for and funding of social services, which brings me to

Community and Social Services—Time does not permit direct comments on policy, except to say that, in the case of daycare especially, there are ramifications which go far beyond the concept of providing temporary service for a working mother. We in the OCSW see the attachment of women to their children as being directly related to the lives of women at the other end of the age scale. The fact that so many of our senior women are poor, and depending on government assistance, cannot be separated from the choices they made in younger years: 1) to enter a traditionally "female" occupation with its lower pay and probable lack of adequate pension; and/or 2) to stay out of the labour force to raise their children with the quality of care they felt only they could provide. As long as quality child care receives the low priority the Ontario Government places on it—and we are now seeing a loss of child care places—women will be faced with this dilemma. And it will continue to have negative effects on their lives as seniors.

The OCSW, I am happy to tell you, has just set up a new sub-committee to study the problems of senior women and to make recommendations on these. But again, as in the case of health programmes, it would be encouraging to see more provincial initiatives in social services, especially where federal funds are available. We realize that there are adjustments to be made under the new block funding set-up. But we at the provincial status of women committees are tired of approaching the federal level only to be told that the initiatives must come from the province.

ONTARIO COMMITTEE ON THE STATUS OF WOMEN: Remarks to the Ontario Government Inter-ministerial Committee, continued

Community and Social Services (continued)

There is still no assured and continuous funding for crisis intervention homes for women and children. The green paper mentioned that a province-wide study of hostel needs should be carried out: was this ever done? The OCSW has suggestions in our most recent brief to Mr. Norton as to the type of housing assistance required by women with children. We are also reminded of the groups of women with special needs, especially in housing and job training--immigrant women and native women. Again, it is a question of federal-provincial jurisdiction, and attention must be paid.

Conclusion -- Prediction of trends, and OCSW priorities

It seems clear that the country's ongoing economic difficulties are such that the economic condition of women will be our primary concern in the OCSW. At the head of our list, then, is equal pay for work of equal value. We have made a presentation to the federal Human Rights Commission's Task Force, and are encouraged by federal progress in moving towards strong enforcement. We hope to see the Commission use its initiatory powers forcefully in connection with compliance.

It seems to me that the federal Commission's activity is bound to increase the demand for equal value in provincial labour legislation—a demand that is also stimulated even now by the growing sophistication of women in the labour force about their earning power and its relation to men's. I must also say that, in my opinion, during a continuing period of slow economic growth coupled with inflation, pressure for general income redistribution will be sustained. Both equal pay legislation and the provision of social services must be considered with regard to this economic reality. Evident injustices with little hope of redress do not bode well for social harmony.

The priorities of the OCSW will continue to be in the areas of employment legislation and opportunities, as well as pensions; and the provision of services to women, especially services such as child care, assistance to seniors and women with special needs, and health delivery, with emphasis on family planning.

Because time limits did not permit discussion of actual policy recommendations, the OCSW took to the meeting copies of briefs and submissions to responsible Ministers of the Ontario Cabinet, together with a list of the OCSW publications since 1971. Our briefs contain many detailed recommendations for policy development.