

October 26, 2023

Employment Standards Review  
Corporate Services Division  
Ministry of Labour Relations and Workplace Safety  
300–1870 Albert Street  
Regina, SK S4P 4W1

Dear Ministry of Labour Relations and Workplace Safety,

**RE: NSBA Feedback on Employment Standards Review**

On behalf of the NSBA – Saskatoon's Business Association and its 750 members, I am writing to provide our comments on the ongoing employment standards review. We commend the Ministry of Labour Relations and Workplace Safety for taking the initiative to seek stakeholder feedback, considering that our province's last substantial review of the employment standards occurred in 2012. We appreciate the opportunity to contribute to this important process.

Prior to compiling this submission, we conducted a survey among our members to gather their perspectives on the ongoing review. Sixty percent of responses were from business owners, and forty per cent were from employees. Our survey focused primarily on two issues highlighted in the Discussion Paper: Protections when ill or injured and Hours of Work, specifically the Right to disconnect.

Regarding "Protections when ill or injured," our survey indicated that 70 per cent agree that the current protections are sufficient. Section 2-40 of the SEA does a commendable job of safeguarding the rights of employees who are ill or injured. This provision ensures that employers may not discharge or discipline employees due to illness or injury, provided specific conditions are met. We believe that the existing legislation strikes a fair balance between employee rights and employer obligations. Any significant change to the eligible sick leave provisions may create unwarranted complications.

On the other hand, considering the rapidly evolving work landscape, largely influenced by factors such as the COVID-19 pandemic, the "work-from-home" and "hybrid" model has gained popularity. In today's changing work environment, with options like working from home and a mix of in-office and remote work, we recognize the importance of rules and policies that help navigate a good work-life balance. On the "Right to Disconnect," our view is that a legislated "Right to Disconnect" is unnecessary given the existing protections and provisions that address hours of work and pay. Further, we believe specific industries might find implementing a legislated "Right to Disconnect" difficult and impractical. For instance, in industries such as the construction industry, where crews may work evenings and weekends and need support from project managers working a typical workweek, implementing a right-to-disconnect may create complexities in contacting project managers. The public engagement document commented on reducing "unnecessary red tape" and creating a legislated "Right to Disconnect" that would amount to additional red tape.

The NSBA has consistently advocated for reducing redundant requirements and red tape. Therefore, we encourage you to consider these principles during the ongoing review.

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In closing, we appreciate your initiative in soliciting feedback on the employment standards review. We look forward to collaborating with the Ministry to ensure that Saskatchewan's employment standards continue to evolve in the best interests of all stakeholders and businesses.

Sincerely,



Keith Moen  
Executive Director