

## Discussion Paper on Employment Equity, Women's Needs and the implications for the Columbia Basin Trust

Submitted to the Columbia Basin Trust at their request  
by Marcia Braundy, Journeywomen Ventures Ltd  
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In this Discussion Paper, I have been asked to address the current Canadian background on equality in employment issues, with a focus on what this means for women in the context of the Columbia Basin Trust.

In looking at the future of work, it is essential to examine the concepts and progress of employment equity. Technology is rapidly eliminating much of the work that women have traditionally done (clerical and secretarial, bank tellers, etc.) and the service sector (professionals, environmental consultants, home support, auto repair and service, food service, etc.) is the fastest growing portion of the economy. Without training and opportunity, many people will be relegated to the low paying, dead-end jobs that service sector work provides at the low end. Historically, the people in those jobs have been those who are already disadvantaged in the labour market.

Although Canada espouses a tradition of equal opportunity, movement in this direction has been quite slow. Equal Opportunity and other voluntary programs implemented during the early 1970's had little effect because there were few tools available to counter both the resistance and the inertia to change ingrained practices. However, in the past 20 years or so, Canadian labour market needs and knowledge of the changing demographics of our working population have forced a reconsideration of the need for legislated incentives to better incorporate disadvantaged groups into the labour force. Change continues to be slow.

Judge Rosalie Abella presented the findings of the Royal Commission on Equality in Employment to Parliament in 1984. Judge Abella documented that historic, overt and covert, conscious and unconscious discrimination had created a very clear disadvantage in employment for certain groups in Canada: they have lower paying jobs, access to fewer occupations; a higher unemployment rate; are out of work longer; are in positions with less decision-making power; receive fewer promotions; and receive less training. Decisions were made to put programs and legislation in place to mandate special measures and practices to strengthen and accelerate the integration process: The Employment Equity Acts of 1985, 1996, and the Federal Contractor's Program.

**What is employment equity?** [\[Top\]](#)

It is a term applied to the Canadian program for achieving a balanced and integrated workforce that reflects the diversity of our society, and provides for both equality of opportunity and equality of outcomes. Equity means more than being treated the same. In Canada, it may include special

measures to remedy the effects of past discrimination and requires the reasonable accommodation of differences to enable equality of outcomes.

“The purpose of this Act is to achieve equality in the workplace so that no person shall be denied employment opportunities or benefits for reasons unrelated to ability and, in fulfilment of that goal, to correct the conditions of disadvantage in employment experienced by women, aboriginal peoples, persons with disabilities and members of visible minorities by giving effect to the principle that employment equity means more than treating persons in the same way but also requires special measures and the accommodation of differences.”<sup>[1]</sup>

The term Employment Equity was coined by Judge Abella to distinguish it from Affirmative Action programs in the U.S. which, while they may have led to some successful employment integration for women and African Americans, were interpreted by some as having too rigid requirements, i.e. “quotas”, which were not backed up with training programs to ensure skills and qualifications to undertake the work.

The 1985 and 1996 legislation require that federally regulated companies (transportation, banking, communications, broadcasting etc) and Crown Corporations report annually to Parliament on the makeup of their workforces, with specific reference to hirings, terminations, promotions, salary levels and occupational categories. The differences were in the enforcement. The 1985 legislation had these reports appearing in libraries across the country in hopes that public scrutiny would embarrass companies into improving their workforce diversity. It was written that employers would develop EE plans, but there were no enforcement mechanisms for this, nor penalties for not doing so. It was still based on an almost voluntary model.

Improvements in workforce diversity were slender. Several important Human Rights cases were filed on the basis of those reports, which did lead to some improvement, but it was cumbersome and a somewhat ineffective and reactionary process. There was also a more successful contract compliance program for Federal Contractors [suppliers of good and services to the Government of Canada] with over 100 employees and \$200,000 worth of contracts which required the development and implementation of an Employment Equity Plan, which included setting targets and timetables, for improvement based on their own business requirements and current availability data. Approximately 1350 employers covering over 1.1 million employees have signed on for this program which enables them bid on federal contracts. Due to heavy lobbying and commitments to undertake a voluntary program, the Construction Industry was exempted.

The 1996 changes to the federal legislation now require federally regulated employers and Crown Corporations with more than 100 employees, most federal departments, and the Canadian Forces to plan for and implement Employment Equity by identifying and eliminating barriers in systems, policies and practices; instituting positive policies and practices and making such reasonable accommodation as will ensure designated group members achieve a degree of representation in each occupational group that reflects their representation in the Canadian workforce or those segments from which the employer may reasonably be expected to draw employees. Stronger enforcement mechanisms are in place, with penalties. Approximately 350 companies are covered under the Act.

***“Sometimes Employment Equity means treating people the same despite their differences, sometimes it means treating them as equals by accommodating their differences.”***<sup>[2]</sup>

Special measures (i.e. special training programs; short term hiring goals; developmental promotions; etc) and the reasonable accommodation of differences (i.e. disability accommodation; flex hours; etc) are to be part of the required plan which “would, if implemented, constitute reasonable progress toward implementing employment equity...”<sup>[3]</sup>

There are some who say that these remedial efforts to reverse the effects of past discrimination are, in fact, reverse discrimination. This thinking implies that for all the time where conscious and unconscious policies and practices held back designated groups in favour of white, able-bodied men, that discrimination was acceptable. Is our society in favour of one kind of discrimination, but not the remedy to that? It seems to be based on thinking that those practices were somehow neutral, and by intervening, this neutrality will somehow be disturbed. “If the day arrives when men and women are equally represented, and we still continue to hire more women, then we will be discriminating against men...”<sup>[4]</sup> Reasonable targets and goals are set by employers themselves, based on their workforce needs and their potential labour market.

Human Resource Development Canada (HRDC) has prepared “availability data” based on post-secondary graduation statistics and other information to assist employers in setting their targets. It is essential that employers recognize that this is a floor, and not a ceiling, for setting their goals, and that special measures include the hiring of “qualifiable” workers and providing them with the training that will ensure the appropriate skills for the positions. Without these initiatives, we will continue to discriminate to the current level of discrimination in our workforce.

Employers must monitor and update plans, communicate, consult, and collaborate with employees regarding development, implementation and results of EE plans. The Canadian Human Rights Commission is responsible for enforcement of compliance with the requirements of the Act, and Human Resources Development Canada is responsible for conducting information programs to promote and foster public understanding of the purposes of the Act; undertaking research; publishing and disseminating information, guidelines and advice, and recognizing outstanding achievement. They are responsible for the FCP, and providing current labour market information.

There are many protections for employers built into the Act. We shall see what impact the new Act has on workforce representation for designated group members.

### Effective Human Resource Practices [\[Top\]](#)

In actuality, many of the activities and requirements called for under the Act lead to more effective Human Resource practices which benefit everyone:

- undertaking a workforce analysis and the development of effective data collection systems (HRDC has developed and shared some excellent computer systems for this);
- analyzing employment systems for formal and informal biases;
- eliminating systemic discrimination;
- the implementation of Remedial measures:
  - targeted recruitment
  - awareness session
  - bridging programs
  - mentoring programs
  - scholarships
  - short tem hiring goals

- Supportive measures:
  - job-sharing
  - child and elder care arrangements
  - career planning
  - workforce training
- Reasonable Accommodation (required as long as it does not constitute “undue hardship” [severe risk of going out of business]):
  - Adaptation or Adjustment of physical plant, materials, environment, policies
  - Special equipment
  - Flex-Hours
  - Job Design<sup>[5]</sup>

In the early 1990's, when Ronald Regan tried to dismantle Affirmative Action legislation in the US, many of the Fortune 500 companies publicly demanded that it be left intact, as the programs and practices had been of overall benefit to their organizations, and had led to better business practices for all.

### What this has meant for Provinces and the Private Sector [\[Top\]](#)

What the federal legislation and Federal Contractor's Program have done is to reinforce the need for and foster program and legislative action in many of the Provinces, and remind private sector employers that they to have a job to do. To speed up the pace of equity integration in the workforce by modelling appropriate behaviour, all provincial and territorial governments except Alberta and Prince Edward Island have put in place public service employment equity requirements. Manitoba, Ontario and Quebec have specific EE contract compliance programs, (Ontario's may have been eviscerated in the recent shredding of EE and Human Rights legislation in that province). Ontario, British Columbia, Saskatchewan, Manitoba, Quebec, New Brunswick, and Nova Scotia have all developed program interventions such as:

- n Build BC Act (1993) has as it's purpose: to facilitate the expansion and diversification of the British Columbia economy by:
  - a) coordinating the government's activities to achieve overall economic development and job creation goals,
  - b) ensuring that all regions of the Province benefit from economic expansion and diversification,
  - c) encouraging public and private sector investment and job creation activities in an innovative manner,
  - d) promoting training and investment in people as a significant component of public sector investment activity, and
  - e) targeting activities under this Act toward traditionally disadvantaged individuals and groups.
- n In BC, the Public Service Act (1993) mandates Employment Equity for public sector employees, including Crown Corporations, Agencies and Commissions.

- n Developmental programs for designated groups in the Provincial Public Service have been mandated in British Columbia, Ontario, Saskatchewan and other provinces
- n Requiring employment equity plans being filed by educational institutions (Ontario);
- n Requiring specific training and employment targets for women and aboriginal people on construction projects (Limestone in Manitoba, Niagra Courthouse, Coop Housing and Northern Projects in Ontario, targets for First Nations participation in construction in Saskatchewan, the Hibernia project in Newfoundland, the Island Highway in British Columbia);
- n In collaboration with community agencies and private sector employers, special training and construction projects targeted at and for designated group members have been developed, such as:

The Downtown Women's Project in Victoria which trained women who had been living on the streets to renovate a 5 story heritage building for an emergency shelter with services for street women dealing with addictions and prostitution issues. This resulted in 5 apprenticeships and many other self-esteem and work benefits.

Highway Constructor's Limited (HCL) used the training course in road building for designated group members to build roads for residential construction on a reserve through which the Island Highway was routed.

- n Equity Access to Apprenticeship projects in Ontario have been very successful, increasing the numbers of apprentices trained in that province by employers.
- n Exploratory courses in trade and technology for women,
- n Industry-based training programs for women to become machinists
- n Bridging programs to move women from clerical into trades and technical jobs at the City of Toronto, Roger's Cable, Consumer's Gas, Unitel, Syncrude and Merit Contractors Association.
- n Downtown revitalization used to train and employ designated groups in Winnipeg
- n Through bridging initiatives, targeted recruitment, and internal developmental opportunities, Syncrude in Ft. McMurray has increased the percentage of women in their trades/technical /operations (TTO) workforce to 17%. Women make up 25% of their heavy equipment operators and that number is still growing.
- n Special hiring and training initiatives at Ontario Hydro, Nova Scotia Power, NB Power, Hydro Quebec CN, Bell Canada, B.C. Tel, Chrysler/GM/Ford and the CAW, and others have been found to be very successful and good for morale. [\[6\]](#)

Many of these initiatives were undertaken without the need for specific legislation, and some were innovative approaches to social and employment issues which have been recognized more widely over the past several years. A number of these initiatives have been evaluated, and would be useful to the Trust in moving forward on these issues.

### **But it takes more than legislation to create social change [\[Top\]](#)**

"We have asked ourselves repeatedly: could employment equity be achieved through natural societal changes? ....without legislation? We had hoped that patience would work miracles and, after all, we are so used to waiting. Although there are tons of equity guidelines and anti-discrimination education programs, we still have employment agencies saying they prefer white applicants." John Tang, Ex. Dir. Chinese Canadian National Council, August 1995. [\[7\]](#)

Demographic forces will have some impact here as well. "No employer can afford to ignore any available source of talent including designated groups such as women, visible minorities, aboriginal peoples and people with disabilities. In fact, by the year 2000, *less than 20 % of the new entrants* to the workforce will be white and male. Any organization which does not prepare itself to successfully manage and motivate a highly diverse workforce is likely to encounter a multitude of employee relations and other business issues." Sherran L. Slack, VP Human Resources, Warner-Lambert Canada Inc. 1995. [\[8\]](#)

From 1970 to 1985, there were 300,000 new entrants to the labour market every year. In 1990, there were about 160,000, and that number will go down every year until 2010. We are in the "Baby Bust" period, the "Birth Dearth". While our parents generation averaged 4.5 children per family, the Baby Boomers generation has averaged 1.7. Immigrants to Canada have come from areas other than Europe, our traditional source of skilled labour during times of need. Native youth will make up 25% of the new entrants to the labour force in Western Canada in the next 10 years. [\[9\]](#) By the year 2001, approximately 66% of the Canadian population aged 15-64 will be made up of designated group members. [\[10\]](#)

Today we have a situation where there are 500,000 single parent families, and 85% of them are headed by women; where 40% of marriages end in divorce, where 75% of divorced fathers do not pay child support; where after divorce the standard of living drops an average of 73% for a woman while it increases an average of 42% for a man; where 70% of women earn less than \$20,000 per year, compared to 28% of men. One out of every five women in Canada is poor (that is up from 1 in 6 in 1991). Is this the legacy we want to continue for the young girls and women of our communities? I think not.

### **Contract Language** [\[Top\]](#)

When the Columbia Basin Trust came into being, and took over responsibility for decision-making and construction in relation to some of the power projects in the Basin, it inherited and was part of the renegotiation of a collective agreement with the Building Trades/Allied Hydo Council and B.C. Hydro and the Columbia Power Corporation. Contract clauses in that original agreement, negotiated as a part of this Province's Employment Equity commitment to the social and economic components of the Build BC Act, were also used for the Collective Agreement guiding the Island Highway construction by HCL.

There were no guidelines about how to implement that contract language, and at HCL, the contracts with the sub-contractors did not contain similar language, which led to late starts and some considerable confusion about the most effective strategies and where responsibility lay for effective implementation. If the construction contractors did not have to encourage nor accept equity participation on their jobs, meeting targets became more difficult for the unions, even when they instituted special measures (targeted recruitment, training, and short term hiring goals). Ultimately, the Provincial Government provided training dollars for equity candidates, but their training only covered very specific job related skills such as how to drive a particular piece of equipment, and not how to deal effectively with new training and working environments.

An Equity Integration Committee was formed to examine the difficulties, suggest solutions, request effective data, monitor and applaud successes. The committee was made up of representation from WITT (Women in Trades and Technology), HMC (The Aboriginal Contractors representatives),

the Nanaimo Multicultural Society , the Ministries of Women's Equality, Social Services, Employment and Investment, several Building Trade Unions, and HCL.

At HCL, the Equity Integration Committee worked for months to ensure effective and accurate reporting and good working relationships between the parties enabled effective special measures to be put in place to achieve their goals. At its prime, the Island Highway achieved overall equity targets of 18.9%, with approximately ½ of that women and ½ aboriginal men. There was a small but steady increase for people with disabilities, and minuscule numbers of members of visible minorities. HCL had set their goals at 20% overall, the unions set theirs at about ½ of that. Because implementation was not planned from the beginning, there was no opportunity to train and prepare the designated group members for the challenges they would face in this unique and unfamiliar unionized construction work environment. This created some unforeseen problems, but still, much was achieved.

The HCL initiative and many of these issues are currently being evaluated by Peter Ferris for the Crown Corporation Secretariat. (Mr. Ferris was the manager responsible for equity initiatives at the Limestone Dam development project in Northern Manitoba.) We can look forward to clear and positive recommendations for improvement.

In 1996, Columbia Power Corporation managed the process of the first small construction project. Again, no overall equity implementation strategy was put in place, and people without a great deal of experience on the issues were "flying by the seat of their pants," without accessing the benefit of the experience at HCL. Targets, 5% Aboriginal workers and 2% for women were set very low. These were exceeded, achieving 6% of hours worked for Aboriginal workers and 5% for women. Women were double counted if aboriginal, and stats were not as well collected and presented as they might have been. Targets were set low on the basis of inaccurate availability data, but they were achieved through the efforts of the staff at CPC, who also are successfully encouraging equity hiring among the companies i.e. Environmental Consultants, they work with who are not covered by the Collective Agreement.

It is clear that the Trust must development a clear Employment Equity Plan and Implementation Strategy to effectively meet the objectives which precipitated the current collective agreement. Using the lessons learned in BC and elsewhere, it will be important to adapt and modify the contract language and identify all of the players who need to be signatory to those agreements. It needs to be decided on which kinds of contracts and with whom employment equity language needs to be in place. There needs to be a clear process in place as to how to implement and change those agreements as the activities of the Trust progress. EE plans need to be in place for Trust staffing and for hiring of consultants as well.

### **What does all this mean for women, and other Designated Group members in the Basin?**

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Women in British Columbia have substantially increased their educational attainment, but their fields of study continue to be limited to traditional fields, i.e. health, education, social sciences, with only a very small proportion in applied science and technology, which are associated with higher paid jobs in growth sectors of the economy. [\[11\]](#)

There has been a dramatic growth of employment among women with children, where currently

77% of lone parent women with children under 16 are participating in the labour force<sup>[12]</sup>, and 54% of women with pre-school children are employed. "In 1993, 60% of lone parent mothers were below the "low income cutoff" compared with 13% in two parent families. "Lone parent females not only are less like to be employed than women in husband and wife families, they also face greater difficulty in entering the labour market compared to twenty years ago."<sup>[13]</sup>

On the other side of the equation, we have, for a myriad of reasons, many young women who have not been encouraged to view their lives in terms of developing a set of skills that will enable them to make the continual choices with which they will be faced. We have not encouraged or insisted that they develop the tool skills, abilities, and pre-requisites to pursue a broad range of career options and we have not provided them with the opportunities under which they might become inspired or challenged to pursue the technical occupations that could provide them with job satisfaction and economic sustenance.

We must empower them through understanding, excite them through hands-on exploration, and ensure that they have the opportunity to develop the academic, communication, tool and life skills, the technological and workplace literacy, and the occupational health and fitness that will serve as the basis for making the most effective and informed career choices throughout their lives.

"Diversity is [also] a reality among women that needs to be taken into account before prescribing policy and program recommendations. This diversity reflects ethnicity, culture, disability, race and sexual orientation. Women who are immigrants, visible minorities, those with disabilities, and aboriginal women tend to experience double or triple disadvantage of racism, sexism and other physical and attitudinal barriers.

Women in these groups not only lag behind males in terms of education and employment, but also confront more difficulty than other women. Particularly, the lower education for aboriginal women and women with disabilities brings them little hope to enter and succeed in a difficult labour market where skill requirements are continually increasing."

"Aboriginal people who graduated from post-secondary education comprised only 3% of college graduates and 1.5% of university graduates...lower than their population shares in 1996." While the employment outcomes for aboriginal and non-aboriginal graduates were similar, Aboriginal peoples overall had a much higher unemployment rate (22% vs 9% for non-Aboriginals). This is most pronounced for Aboriginal people living on-reserve (34%). The median employment income was 64% of that for non-aboriginals. [First Nations issues will be dealt with in another paper.]

Visible Minority people have a higher educational attainment than non-visible minorities. (17% as opposed to 10%) and concentrate their studies in business and applied sciences. In 1991, their unemployment rate was 12.1%, higher than the 10.3% average for the Province of British Columbia. There were also large variations among sub-groups, i.e. 19% for Latin Americans compared with 6.7% for Japanese.

"A major disincentive to employing persons with disabilities is the extra time and expenditures which may be necessary for special needs of persons with disabilities. Many employers cannot afford the costs of making their workplaces accessible. They are often mis-informed about the costs of accommodation, and should be better informed about the long-time benefits for providing access to persons with disabilities.

Employers' / recruiters' perceptions and attitudes are a major barrier as they often prejudice capabilities on mis-information about disabilities. For example, they sometimes equate disability with sickness, and therefore they worry about that employees with disabilities may have long periods of sick leave."<sup>[14]</sup>

Issues for people with disabilities, Aboriginal people and Visible Minorities are compounded for women from those groups.

### Local Issues [\[Top\]](#)

When East and West Kootenay women met in 1994, to identify issues related to women's employment and training needs, their separate responses echoed together.

Childcare and transportation were clearly barriers to access and achievement:

Childcare at education and training centres was a strongly expressed need, as was childcare availability for shift work.

There are towns in the West Kootenay where bus service comes within a few miles of meeting, but there are no connections. Until bus service runs between communities, women's ability to access education and jobs remains limited.

Education and training should be more available through electronic learning centres in rural communities.

Support for centres such as the Salmo Coop for women owning home-based businesses around the Basin.

Employment opportunities which provide a family wage and job satisfaction.

Exploratory Course in trades and technology for women that focus on skill development and have access to child care and transportation assistance.

Special measures must be undertaken to ensure that those women who have been denied exposure and prior experience with mechanical tools and materials, are given sufficient orientation training to enable them to develop the skills, confidence and background necessary to become successful workers and managers in technical occupations. They must address the other barriers that women experience - the multiple roles women play as workers and caregivers; the realities of poverty and childcare responsibilities that circumscribe women's lives; gender stereotyping and women's often limited experience with trades, technical and operational (TTO) work.

The overall training needs of designated groups must be met, along with the specific technical skills. To be successful, sponsors of programming must recognize the differing needs. They must develop, in consultation with WITT or other designated group representatives, adequate preparatory training, support and follow-up for women, as well as for members of other designated groups, either exploring or entering trades and technical training.<sup>[15]</sup>

Access to GETT (Girls Exploring Trades and Technology) Camps for 7th and 8th grade girls to broaden career options.

Sponsored by local businesses and labour organizations girls spend a week getting a crash course in practical building skills and create a go-cart from scratch. They learn to use computer assisted design (CAD), mechanic and machine tools, carpentry tools, paint and then race their go-carts on the last day. They go on tours of local industry, watch films and videos, and play tool ID games. These camps have spread to a number of areas of the country and are successful wherever they occur because of the dedication of role models, tradeswomen and technologists from local WITT groups who volunteer their time or have their time donated by an employer or union. And the girls get to learn to use the tools safely and effectively from women who are doing the work every day. The informal time spent with the role models, where all questions are fair game, can be just the ticket for some "occupational research at the point when they are challenged to choose their secondary school study programs, and by helping them understand the way those choices will either expand or curtail their future career choices, we can help them to maximize their future.

The Ministry of Employment and Investment has been working on a Provincial Women's Employment Strategy, and has prepared a paper called *Women's Employment Strategy: Options for Initiatives*. This Ministry of Women's Equality has been given responsibility moving forward on those ideas, some of which relate to public sector, and some of which relate to private sector issues. That paper is 24 pages long, with 51 very interesting and useful initiatives. I would recommend this paper to the Trust as they examine the ways in which they might meet their social, economic and environmental objectives.

Whatever initiatives the Trust becomes involved with to meet those objectives, it will be important to pursue them within the context of a set of principles and a framework for your activities as an employer, a granting agency if that is a direction you take, and as a guiding force for ethical and sound economic, environmental and social development and change in the Basin. Parts of this framework need to include an Employment Equity commitment and broad implementation strategy; a Human Resources strategy for the Trust and a human resources development plan to support and foster the people of the Basin to fulfill the mandates of the Trust. We must ensure the population has the skills it will need to guide that development. As well, the framework needs to contain principles and practices related to Health and Safety and Environmental considerations. This overall framework would guide the work of the Trust over time. A communications/education strategy can assist in bringing about a broader consensus, that we are all moving in similar directions for similar reasons.

Then, each time a project is being considered, a focus can be placed on developing appropriate policies, activities, and assessment and feedback mechanisms to ensure the desired effects are taking place. Evaluation can include the ways in which the goals of the framework have been met, and whether we are any closer to the ends we are working towards, one of which is to ensure equitable access to training, employment, financial support, and service to the community opportunities for women, Aboriginal people, visible minority people and persons with disabilities.

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- [1] Statutes of Canada 1995. Chapter 44. An Act respecting employment equity. Pg 1.
- [2] Abella, Rosalie. (1984) *Equality in Employment - A Royal Commission Report*, Ottawa:Canada
- [3] Statutes of Canada 1995. Chapter 44. An Act respecting employment equity, pg 9
- [4] Mintry, Mildred. (1993) *Blinkers - A workshop to explore the value of diversity in trades training*. Industrial Training Division, Department of Education, Province of Newfoundland. Pg.31.
- [5] (1996) *Employment Equity in Canada - A workshop designed for WITT Women* . London, Ontario: WITT National Network.
- [6] Braundy, Marcia, Mng.Ed. (1989) *Surviving and Thriving - Women in Trades and Technology and Employment Equity*. Winlaw, B.C.: Kootenay WITT,
- [7] *Towards Equity*. Human Resources Development Canada (HRDC). September 1996.
- [8] Ibid, pg 4.
- [9] Unpublished notes from HRDC to the Canadian Labour Force Development Board. 1993.
- [10] *Towards Equity*. HRDC. September 1996.
- [11] *Training for Whom - Research Background Paper*. Ministry of Education Skills and Training. 1996. Publications Coordinator: (250) 356-2500.
- [12] *Profile of Women In British Columbia*. BC/Yukon HRDC. Economic Services, December 1994.
- [13] *Training for Whom*. Pg. 93.
- [14] Ibid. Pg 93, 98-100, 104-5, 113.
- [15] Braundy, Marcia. (1992) *Out of the Stream and Into the River - an Occasional Paper*. Ottawa:Canadian Vocational Association.

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