
Submission on Youth Employment & Internships

The Canadian Intern Association is pleased to participate in the Finance Committee's study on youth employment. Internships have become a central element of young people entering the workforce and interns have emerged as Canada's newest type of worker.

This submission focuses on independently organized unpaid internships. An estimated 300,000 occur across Canada annually. "Internship" is not defined in Canadian workplaces or in law and may take a variety of forms. Internships can be paid, unpaid, or remunerated based on a stipend or other benefit. Internships can be part of a formal educational program (like a co-op or apprenticeship) or may be independently organized.

This submission describes some problems with unpaid internships, outlines internship-related issues within federal jurisdiction, and provides recommendations.

Problems with Unpaid Internships

Unpaid internships are problematic for three reasons:

1. Unemployment – Unpaid internships contribute to youth unemployment, replace paid positions, and drive down wages. In 2013, roughly 14% of Canadians aged 15-24 who were looking for work could not find a job.
2. Inequality – Unpaid internships facilitate socioeconomic, gender, and intergenerational inequality. Those without the economic means or connections to perform unpaid work are becoming barred from entering a variety of professions. Furthermore, internships are replacing paid entry-level jobs and making it difficult for young Canadians to gain meaningful work experience.
3. Illegality – Unpaid internships are often illegal. In Canadian workplace law, interns are considered employees and entitled to minimum wage unless a statutory exclusion applies. Most provinces have created exclusions for internships that are part of a formal educational program; however, federal workplace laws provide no clarification on the status of interns.

Federal Internship-Related Issues

The Canadian Intern Association urges the government to address three internship-related issues that are within federal jurisdiction:

1. Lack of data – Currently no provincial or federal government has collected any data regarding the prevalence or characteristics of unpaid internships in Canada.
2. Legal ambiguity – The *Canada Labour Code* does not have clear provisions for training and internships, and the Canada Labour Program has not released interpretation guidelines. As a result, it is not always clear when interns entitled to basic employment standards such as minimum wage, or whether they are protected under workplace health and safety laws.
3. Insufficient enforcement – Few enforcement measures exist to ensure against employee misclassification in the context of internships.

Recommendations

1. Statistics Canada should begin tracking internships. The data collection could include whether the internship is paid or unpaid, the industry and duration of the internship, and whether a job was offered afterwards.
2. Parliament should amend the *Canada Labour Code* to extend employment standards protections to interns working for federally-regulated employees. The Canada Labour Program should also release interpretation guidelines to clarify the status of interns.
3. The Canada Labour Program and the Canada Revenue Agency should adopt an enforcement strategy regarding employee misclassification and internships.

About the Canadian Intern Association

www.internassociation.ca

We are a federal not-for-profit organization that advocates against the exploitation of interns and aims to improve internship experiences. We were founded in June 2012 and work on behalf of students, youth, and other Canadians affected by issues related to both paid and unpaid internships.

Our campaigns provide support to interns and educate the public about internship issues. We encourage interns to “claim back their pay” by filing complaints with the provincial labour ministries and the Canada Labour Program. We put Canadian organizations on our “Wall of Shame” to draw attention to illegal or problematic internships. We also provide presentations at universities and colleges to educate students about their workplace rights.