



Ms. Elizabeth Pelozo, Chair  
Civic Works Committee  
City of London  
300 Dufferin Ave  
London, ON N6B 1Z2

1 March 2021

Dear Ms Pelozo:

I am writing on behalf of the Inclusive Economy London Community Benefits Action Table. Inclusive Economy London and Region is a network of organizations collaborating to initiate economic development practices that are designed to address poverty, sustainability, and local economic resilience. Our work on community benefits includes an examination of best practices across the country, learning from other municipalities and social procurement practitioners, and building knowledge and capacity across sectors in London to respond to community benefits as they come forward.

We are excited to see forward momentum on the Community Employment Benefits (CEB) portfolio at the City of London and to see that there is an intention to apply community benefits to a range of projects in the future. Through community benefits there is a real opportunity to create good jobs and strengthen local businesses here in London by changing the way that the City awards contracts for projects, goods and services.

We are thankful for being consulted in the creation of the strategy, specifically around the creation of the CEB appendix. The commitment of staff and council to leveraging infrastructure opportunities for greater social and economic impact is greatly appreciated.

In this submission we outline several recommendations to consider for strengthening the approach to CEBs outlined in consent item 2.10.

**Recommendation 1:** Increase the target set for hiring through the CEB program closer to 20% of total wages. We believe that the current target of 5% of total wages does not reflect national best practices for CEBs and Community Benefit Agreements. It is important to note that currently working employees that fit in the equity seeking groups will count toward this target.

City of Surrey, BC - target of 20-30% of wages going to CEB identified groups  
Gordie Howe International Bridge CBA - target of 20% of new hires being from identified groups  
Woodbine Casino CBA - target 40% of new hires through social hiring practices

**Recommendation 1a:** Increase the emphasis on social procurement among bidders in the CEB process. A component of CEB policy is to increase purchasing from small businesses and social

enterprises. At this point there are no requirements for the RT project to measure this aspect of CEBs. We believe that with a small adjustment to the RFX questions and weighting, that subcontracting to small businesses and social enterprises in London would be encouraged.

**Recommendation 2:** Structure qualification/tender/bid documents and evaluation criteria so that they include scoring systems that award points to proponents for how they respond to community employment benefit outcomes. Buy Social Canada, a national expert on social procurement, recommends a minimum of 10% of evaluation points being awarded for social value.

For example one of the questions evaluated on an RFP could read: Explain how through this project you will maximize community employment benefits? How will procurement and subcontracting from SMEs/Social Enterprises and hiring/training programs be incorporated into this project?

With the current proposal there are no points awarded to bidders based on their enthusiasm/capacity for fulfilling community benefit agreements. Therefore there is little incentive to change industry practices in ways that create longer term transformations and benefits.

**Recommendation 3:** Fund the development of a community benefits network or other capacity building activities for CEBs in the city. A community benefits network would be a group external to the City Administration for the purposes of informing community benefit practices, building capacity to implement, and ensuring a strong community voice in CEB activities. There is fairly wide consensus among community benefit advocates that without such a community group the impact of CEBs will be limited.

**Recommendation 3a:** Consider reallocating the Cash Allowance connected to CEBs to the formation of a community benefits network.

Through our work we've identified existing employment pipelines that would be able to provide on-site support for hires through the CEB program (i.e. employment sector organizations). The cash allowance idea, as per the staff report, appears to be a duplication of existing funding and resources already allocated to employment organizations to assist job seekers and employers. The cash allowance may also undermine the importance of encouraging contractors/industry to build relationships with employment sector organizations.

In closing, I would again like to thank staff and council for setting London on the journey of figuring out how to best do community benefits. Without your leadership on this work, London would be missing a massive opportunity to create good jobs and build a better city - literally.



**Action:** we request that the Committee ask staff to continue to work with Inclusive Economy London to address these 3 recommendations for implementing a Community Employment Benefits program at the City of London

Sincerely,

A handwritten signature in black ink, appearing to read "m. Courey", is positioned below the word "Sincerely,".

Michael Courey, PhD  
Lead Organizer, Inclusive Economy London and Region  
Director, London Poverty Research Centre at King's