

March 31, 2026

Dear Worker Compensation Act Review Committee:

I am writing on behalf of 7,500 allied health care professionals represented by the Manitoba Association of Health Care Professionals (MAHCP) in response to the Workers Compensation Act Review call for submissions. Our members work in public, non-profit and private health care settings across the province as paramedics, therapists, technologists, counsellors and many other diverse and specialized professions that are essential to the delivery of health care for Manitobans.

The Manitoba Federation of Labour (MFL) has submitted 23 thorough and important recommendations that, if implemented, will strengthen the *Workers Compensation Act*. MAHCP is proud to endorse all 23 of the MFL's recommendations, which are essential to provide better protections for all Manitoba workers.

I would like to highlight a number of the MFL's recommendations that are particularly relevant for our members.

Issue 1: Provide Fair Coverage for Workplace Psychological Injuries

Incidents of workplace violence and other traumatic events in health care are rampant, as is the chronic stress of working short in a protracted staffing crisis. The psychological injuries directly resulting from these working conditions are often well documented and physician-attested, but WCB has used the narrow definition in the Act to deny valid claims by MAHCP members. Attempts made by WCB to clarify the meaning of "traumatic event" through policy have only served to limit coverage further. These denials are not only unjust, but they can also lead to further psychological and physical harm to individuals by compounding the hardships they have already suffered simply by showing up to work. WCB denials can prolong a health-care worker's recovery and keep them away from the frontline, where they are desperately needed. The Act must be amended to cover all workplace psychological injuries, including both chronic and traumatic stress injuries, as the MFL has recommended.

Issue 6: Replace Pension Contributions Lost Because of a Workplace Injury/Illness

Workers who are injured at work should not lose anything from their wages and benefits due to the fact they are unable to work. This principle should apply to any injured worker, regardless of how long they are off work due to their workplace injury. Pension contributions are as vital to the health and welfare of individuals as wages or any other benefit. **MAHCP supports the MFL's call to eliminate pension loss as a consequence of workplace injury by requiring employers to maintain contribution remittances for workers receiving wage-loss benefits of less than 24 months, ensuring uninterrupted pensionable service for the duration of the injury.**

Our focus is you.

Issue 7: Ensure Wage-Loss Benefits Reflect Collective Agreement Improvements

Similar to Issue 6 above, MAHCP fully supports the principle that workers should be made whole if injured or disabled through the course of their work. The policy and process of indexing that WCB currently utilizes in many cases does not fully account for negotiated wage increases. As a result, some injured workers – including MAHCP members – have been disadvantaged compared to their coworkers who were able to remain on the job, and they have lost out on increases to which they are entitled, including retroactive increases. All negotiated increases must be included and fully accounted for in the calculation of wage-loss benefits.

Issue 12: Strengthen Actions and Accountability for Prevention

The WCB has a legislative mandate to “promote safety and health in workplaces and to prevent and reduce the occurrence of workplace injury and illness.” However, it is clear WCB is falling behind in fulfilling this mandate, considering the many problems that continue to go unaddressed.

Skyrocketing violence and psychological injuries, along with over 117,000 days lost to workplace injury in healthcare in 2025, have left frontline workers understaffed, overstressed and burnt out.

WCB must be mandated to develop a prevention plan as the MFL recommends, and to consult workers and employers in the development of that plan.

Given the disproportionately high injury rates in healthcare, MAHCP is also recommending a specific healthcare-advisory committee for safety and health accountability and prevention, reporting directly to the health minister. Education and accountability, paired with investment, can create a true culture of safety.

Issue 13: Review the SAFE Work Certification Program

MAHCP fully endorses the need for change, as the current program lacks appropriate oversight and is rife with conflicts of interest. As evidence of this need, healthcare employers have been accredited or were deemed eligible for accreditation without meeting basic legislative requirements such as adequate workplace safety and health committees and violence prevention policies. The SAFE Work Program is in dire need of a comprehensive review and urgent changes.

Issue 19: Provide Stronger Deterrents to Claim Suppression

In addition to MFL’s recommendations on this issue, MAHCP believes that public employers, including healthcare employers, should be banned outright from using third party groups to represent them during the claim adjudication or appeals process. MAHCP has witnessed third-party investigators representing Shared Health who have disrupted claims adjudication and created false narratives in the hope of misleading the board and creating a hostile environment for injured workers.

Once again, MAHCP encourages the committee to implement all recommendations put forward by the MFL.

Further to MFL's recommendations, MAHCP would also like to recommend a biennial review of the permanent impairment rating schedule. The current rates do not take into account the full scope of workplace injuries and their impacts on workers. Our members have been negatively impacted by these inadequate and overly complex schedules.

I would like to thank the Committee for the opportunity to provide input for the current WCB Act review. Your work is critically important to ensure that all Manitoba workers receive the highest level of protection and appropriate compensation. If you require further clarification on our position, please don't hesitate to contact me at president@mahcp.ca or by phone at 204-772-0425.

Sincerely,



Jason Linklater
MAHCP President