



Bill 149 | Working for Workers Four Act

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# Your Compensation Playbook

## Are you ready for January 2026?

DATE

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September 2025

PRESENTED BY

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*on behalf of the TLOMA  
Compensation Committee*

# Key Highlights

- Include salary ranges (max \$50K spread) in job ads starting Jan 1, 2026.
- Must disclose use of AI in any stage of the hiring process.
- Canadian experience can not be required in job ads or applications.
- State whether the position is for an existing vacancy.
- Must inform interviewed candidates of hiring decision within 45 days.
- Must keep a copy of the job posting for 3 years after it's taken down. Also keep related applicant info and decision communication records.



## Exemptions:

- Roles with pay over \$200K/year or top range over \$200K.
- Small businesses (<25 employees) are exempt from posting rules at the time of posting.

# What happens if our Firm is not Compliant?

## Fines and Penalties

Firms may face administrative fines under the Employment Standards Act (ESA).

## Ministry of Labour Inspections

Non-compliance can trigger inspections or audits by government officials.

## Legal Risk

Applicants can file complaints; legal action may follow if violations are confirmed.

## Reputational Damage

Lack of transparency or fairness may harm the Firm brand and public image.

## Loss of Competitive Advantage

Non-compliance may impact talent attraction and retention in a competitive market.

## Increased Administrative Burden

Investigations can lead to paperwork, legal fees, and internal disruption.

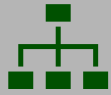
# Workshop Objectives

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1. How to create a salary structure: Key Steps
2. How to create salary ranges
3. Firm compensation philosophies
4. Case Study
5. How to communicate pay transparently
6. Things to watch out for
7. Wrap up & Questions



# How to create a salary structure: Key Steps



**Define job roles and responsibilities:** The first step is to clearly define what each job in your firm does and what tasks the role is responsible for.



**Conduct a job analysis:** Once you have defined the roles, you need to conduct a job analysis to identify the skills, knowledge, and abilities required for each position.



**Determine job worth:** Based on the job analysis, determine the worth of each job based on factors such as level of education or experience required, qualifications needed, and market demand.

# Key Steps cont.



**Research market rates:** Conduct market research to determine the salary range for each job in your industry and location.



**Define pay grades:** Create pay grades that group jobs with similar worth and set minimum, midpoint and maximum salary levels for each grade.



**Establish salary ranges:** Set salary ranges for each pay grade by determining the difference between minimum and maximum salaries.

# Key Steps cont.



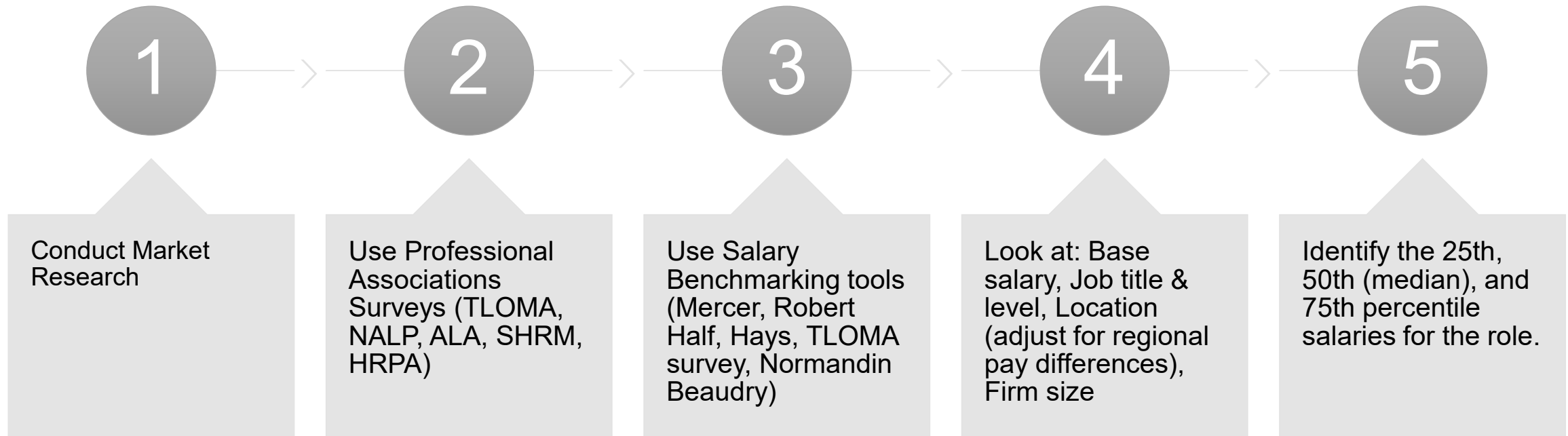
**Ensure compliance:** Labour laws and regulations place restrictions on how employers compensate their employees. Firms can't just pay however or whatever they want - there are legal rules (example: minimum wage, equal pay, overtime, etc.) that limit and guide how pay must be structured.



**Formalize a salary structure:** Formalize a salary structure that outlines the pay grades, salary ranges, and job titles for each position in your firm.

# How to Create Salary Ranges

# Create Salary Ranges



# **What is your Firm's Compensation Philosophy?**

# Define Your Compensation Philosophy

Decide where you want to position your Firm relative to the market.

## Are you paying at:

50th percentile (market median)

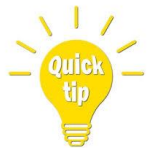
Standard competitiveness

Above market (75<sup>th</sup> percentile)

To attract top talent

Below market (25<sup>th</sup> percentile)

Often for budget-conscious roles or with strong benefits (indirect compensation)



*Be consistent across roles and levels.*

# Why might a Firm pay at the 50<sup>th</sup> Percentile?

## Competitive

Matches what most Firms are paying for the same role

## Attracts solid talent

Appeals to a wide range of qualified candidates

## Supports Internal equity

Helps maintain fairness across roles and departments

## Cost effective

Offers market-aligned pay without overextending budgets

## Predictable budgeting

Easier to plan compensation costs over time

## Reduces turnover risk

Fair market pay lowers the chance of employees leaving

## Protects Firm brand

Seen as fair and standard-paying Firm

Paying at the median is a safe and strategic choice for firms that want to stay competitive in the market without leading or lagging on pay.

# Why might a Firm pay at the 75th Percentile?

Attracts Top Talent | Retains Key Employees | Supports Business Strategy | Reinforces Firm Brand

## Targets high performers

Designed to recruit candidates with above-average skills or experience

## Competitive advantage

Helps the Firm stand out in a tight talent market

## Reduces turnover

Employees are less likely to leave for slightly better offers elsewhere

## Boosts engagement

Higher pay can lead to stronger commitment and performance

## High-impact roles

Used for positions that directly influence revenue, innovation, or growth

## Critical talent market

Necessary when hiring in-demand roles (e.g., technical roles, senior leadership)

## Employer of choice

Builds a reputation as a top-paying, top-performing workplace

**Considerations:** Higher compensation costs; Expectations for higher performance and results  
May require stronger performance management and accountability

# Why might a Firm pay at the 25<sup>th</sup> Percentile?

## Cost control

Budget limitations or  
low-margin business

## High talent supply

Role is easy to fill or  
low skill

## Strong indirect compensation

Hybrid (WFH), RRSP  
match, pension plan,  
growth opportunities

## Location-based pay

Lower cost of living  
regions

## Entry-level roles

Early-career positions  
with growth potential

## Prestige or mission

Brand appeal or  
meaningful work

## Internal pay equity

Maintaining fairness  
across roles

## Risks to Consider:

1. Difficulty in attracting top talent
2. Higher turnover
3. Lower employee morale
4. Potential brand impact to the Firm

# Compensation Philosophy cont.

If the 25th percentile salary for a particular role is \$60,000, it means that 25% of employees in that role earn \$60,000 or less, while 75% of them earn more than \$60,000.

If the 75th percentile salary for a particular role is \$80,000, it means that 75% of employees in that role earn \$80,000 or less, while 25% of them earn more than \$80,000.

25<sup>th</sup> 60,000

50<sup>th</sup> 70,000

75<sup>th</sup> 80,000

# Case Study

# Office Manager Position

Chat GPT query: “Please help me to put together a salary range for an Office Manager in the legal sector in Toronto Ontario”

- Entry-level roles or smaller firms can expect salaries around CAD 45–60K.
- Mid-sized firms with more responsibilities or experience—typically CAD 60–80K.
- Larger or specialized firms, especially in high-demand areas like downtown Toronto, may offer upwards of CAD 80–100K, or even CAD 100–130K for seasoned professionals.
- The Robert Half median of CAD 82K is a good benchmark for mid-level legal office managers. Robert Half
- Job Bank's “legal firm manager” data suggests potential for much higher earnings, but it represents a broader management role. Job Bank
- Reddit insights confirm that at top-tier firms, six-figure salaries aren't uncommon for long-tenured managers. Reddit

# Office Manager cont.

## Market Research

Vendor	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	Location
Robert Half	\$60,755	\$71,446	\$83,962	Toronto
Robert Half	\$67,000	\$82,000	\$99,250	Toronto

➡ Robert Half Salary guide

➡ Chat GPT

Vendor	Entry	Median	Senior	Average	Location
Randstad	\$44,850		\$90,000	\$52,533	Toronto
Indeed				\$58,509	Toronto
Glass Door	\$45,000		\$64,000	\$54,000	Toronto
Glass Door	\$45,000		\$67,000	\$55,000	Toronto
Pay Scale	\$45,000	\$59,000	\$76,000	\$58,856	Toronto
Hays	\$60,000		\$90,000		Toronto

➡ Chat GPT

# Office Manager cont.

## TLOMA Compensation Survey Data

*Not true data or job description*

	Title	Firm Size	# of Firms / Incumbent	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	Average	Years of Experience
Finance	Manager	All Firms	20 / 28	\$110,000	\$115,000	\$120,000	\$115,000	8-12
	Supervisor	All Firms	7 / 25	\$75,000	\$85,000	\$95,000	\$85,000	7-9
	Advanced	All Firms	4 / 10		\$82,500		\$84,000	10

### *Job Description:*

*Responsible for maintaining the general ledger, preparing accurate financial and operational reports, conducting budget analysis, and generating financial statements in accordance with Canadian Accounting Standards for Private Enterprises (ASPE) and applicable regulatory requirements.*

# Office Manager cont.

## TLOMA Compensation Survey Data

*Not true data or job description*

	Title	Firm Size	# of Firms / Incumbent	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	Average	Years of Experience
HR	Manager	All Firms	15 / 29	\$98,000	\$108,000	\$125,00	\$110,300	8-12
	Senior	All Firms	14 / 32	\$81,500	\$88,600	\$98,400	\$89,500	6-9

### *Job Description:*

*Develops, implements, and administers Human Resources policies, programs, and procedures in accordance with applicable federal and provincial employment legislation. Provides consistent guidance to managers and employees on a range of employment matters, including employee relations, workplace investigations, disciplinary action, complaints, recruitment, compensation, benefits, and staffing. Ensures compliance with relevant laws such as the Employment Standards Act, Human Rights Code, Occupational Health and Safety Act, and other applicable statutory requirements.*

# Office Manager cont.

## TLOMA Compensation Survey Data

*Not true data or job description*

	Title	Firm Size	# of Firms / Incumbent	25 <sup>th</sup> Percentile	50 <sup>th</sup> Percentile	75 <sup>th</sup> Percentile	Average	Years of Experience
Facilities	Manager	All Firms	15 / 19	\$99,200	\$109,700	\$123,000	\$110,600	8-12
	Senior	All Firms	7 / 9	\$65,800	\$67,200	\$77,000	\$70,000	7

### *Job Description:*

*Plans and manages the Firm's current and future physical space requirements in accordance with operational needs and applicable building codes and regulations. Oversees the maintenance, renovation, and overall management of the Firm's facilities, infrastructure, and equipment. Manages relationships with external vendors and service providers, negotiates and administers lease agreements, and coordinates emergency preparedness and response planning. May supervise boardroom operations and food services teams. May also be responsible for implementing and maintaining workplace health and safety programs in compliance with the Occupational Health and Safety Act and other relevant legislation.*

# Office Manager cont.



Next Steps!



Remember the Key Steps and Compensation Philosophy?  
Answer these questions before drawing up salary ranges.

**For the Office Manager position, did we:**

1. Draw up a job description?
2. Conduct a job analysis to identify the skills, knowledge and abilities?
3. Determine the qualifications?
4. Determine the percentage and scope of the duties of the position (Finance/HR/Facilities)
5. Create pay grades that group jobs with similar salary levels?
6. Consider the following factors: Firm size, practice area, leadership expectations, autonomy of the role.
7. Decide on range boundaries: Minimum + Maximums
8. Will the salary include / exclude performance bonuses?
9. Is the position hybrid?
10. Are there other indirect compensation benefits to consider (pension, RRSP match)?
11. Where do you want to pay within the market?

# Office Manager cont.





Level of Position	Salary Range Example
Entry / Limited scope	\$45,000 - \$60,000
Mid-level / solid core role	\$60,000 - \$80,000
Senior / high autonomy & experience	\$80,000 - \$100,000+
Top-tier / Bay Street / leadership	\$100,000 - \$130,000

Note! Salary range example is provided for training purposes only and do not reflect actual data.

# **How to Communicate Pay Transparently**

# Define What Pay Transparency Looks Like for Your Firm

Levels of transparency will help to build trust, fairness and clarity with compensation practices

-  Share internal salary ranges (e.g., salary bands by level)
  -  Provide clear criteria for raises/promotions
  -  Publicly post salary ranges in job postings
-  Decide what's appropriate based on your size, culture, and industry.

# Be Proactive!

## Don't Wait for Employees to Ask



- **Job postings** → Include salary ranges
- **Offer letters** → Outline total compensation (base, bonuses, benefits)
- **Employee handbook or Intranet** → Share pay structure and ranges
- **Onboarding conversations** → Set expectations clearly
- **Compensation reviews** → Explain the pay changes, if awarded

# Explain the “Why” Behind Pay Decisions

Help employees understand how their pay is determined, including:

- Market benchmarks (e.g., TLOMA Compensation Surveys, Normandin Beaudry surveys)
- Agency market data (Robert Half, Hays, Indeed, etc.)
- Internal equity (pay parity with colleagues in similar roles)
- Performance (metrics, ratings, impact)
- Experience/tenure
- Budget or firm financials

These help to build employee trust; reduces pay-related conflict; encourages equity & inclusion; and supports retention & performance



Even if you can't give everyone a raise, explaining how decisions are made can reduce frustration

# Share Salary Bands or Pay Grades

Even if you don't share individual salaries, disclosing pay bands helps employees:



See where they are in the range



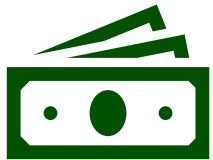
Understand promotion paths



Identify pay growth potential

# Train Managers and Partners to Talk About Pay

Equip them to handle pay conversations with consistency and confidence, including:



How to explain pay decisions



What not to say (e.g., “You are lucky to have a job”)



When to refer someone to HR



How to handle tough questions (e.g., “Why does X make more than me?”)

# Provide Total Compensation Statements

Break down everything you pay for, not just salary:

Base  
salary

Bonuses

RRSP  
contributions  
/ pensions

Health &  
dental  
benefits

Paid vacation

Paid sick  
days


Training or  
education  
support

This shows the full value of working at your Firm.

# Things To Watch Out For

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Watch for situations where newer employees are earning close to or more than tenured staff in the same role. This can lead to dissatisfaction, turnover, and morale issues among long-serving employees.



Ensure individuals in similar roles are being paid fairly and consistently, regardless of gender, race or ethnicity, age or other protected grounds for comparable work.

Consider conducting regular pay equity audits.



Outdated Market Data - Review salary benchmarks every 12 to 24 months, or more frequently in fast-changing markets.

# Avoid These Common Mistakes

Hiding	Hiding salary ranges - leads to distrust
Making	Making exceptions without documentation
Using	Using pay secrecy to avoid hard conversations
Misclassifying	Misclassifying roles to underpay
Promising	Promising raises without follow-through

# Example Message to Employees

“At ABC LLP, we believe in fair, equitable, and transparent pay. We use industry data and internal benchmarks to set salary bands for each role. Your pay is based on your experience, role scope, and performance. You can find our compensation framework on the intranet, and your manager, HR or a member of the Management Team is always available to discuss where you are within your band and how to grow.”



# Wrap up... Final Thoughts

# Join us!

September 23, 2025 for the TLOMA Compensation Survey Results Presentation

Come join this session to learn more about  
Pay transparency



# Engage a member of your TLOMA Compensation Committee

2025 Compensation Committee Members		
Cheryl Brass	Manager, Compensation & Benefits	Osler, Hoskin & Harcourt LLP
Doug Moody	Chief Operating Officer	Barriston LLP
Katherine Mather	Director, Human Resources	Koskie Minsky LLP
Lori Overend	Director, Human Resources	Tokin Manes LLP
Nelly Meira	Chief Human Resources Officer	Goodmans LLP
Raili O’Born	Director of Administration	Robbins Appleby LLP

# Thank you!

