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Reducing Poverty in British Columbia

100 More Homes Penticton

We the undersigned represent a group of community leaders, 100 More Homes Penticton, who have been working together since 2016 to support local housing solutions and end chronic homelessness in the city of Penticton. Last year we signed a Memorandum of Understanding with the City to formalize our collaboration in addressing these challenges.

A Rise in Poverty and Precarity

The South Okanagan Similkameen region is experiencing serious, and critical levels of poverty. We are increasingly concerned for local community members' health and well-being. The potential for loss of life due to exposure to winter weather conditions for those without homes has been very real this past winter. The number of people impacted by homelessness, including those precariously housed, have risen dramatically in the past two years. This includes significant numbers of women, children and seniors. In Penticton it is anticipated that there are over 100 individuals in need of shelter support, with 30-50 of those having complex needs.

This rise is not unique to Penticton; communities across Canada are experience high levels of homelessness, including record numbers of individuals sheltering outdoors following the phase-out of emergency financial benefits and housing spaces temporarily added during the COVID-19 pandemic. The broader economic trends and pressures, including the risk of sustained inflation and possible economic downturn, present a risk of further precarity and need in Penticton (and beyond).

Limitations in staffing and capacity are affecting all our community support organizations. These challenges again reflect broader labour shortages, but also limited resourcing in the sector. These challenges were expressed in a joint letter last November¹ to various levels of government from shelter and outreach operators across the BC Interior. Some requests have already been met, with efforts to enhance coordination with the Interior Health Authority, and also the boost to the shelter allowance rate within BC Employment Assistance programs. However, any gains made in recent years are unlikely to be sustained indefinitely in the absence of indexation to inflation, greater cohesion across programs, and improved accessibility of services for community members in need.

The Inflated Cost of Living

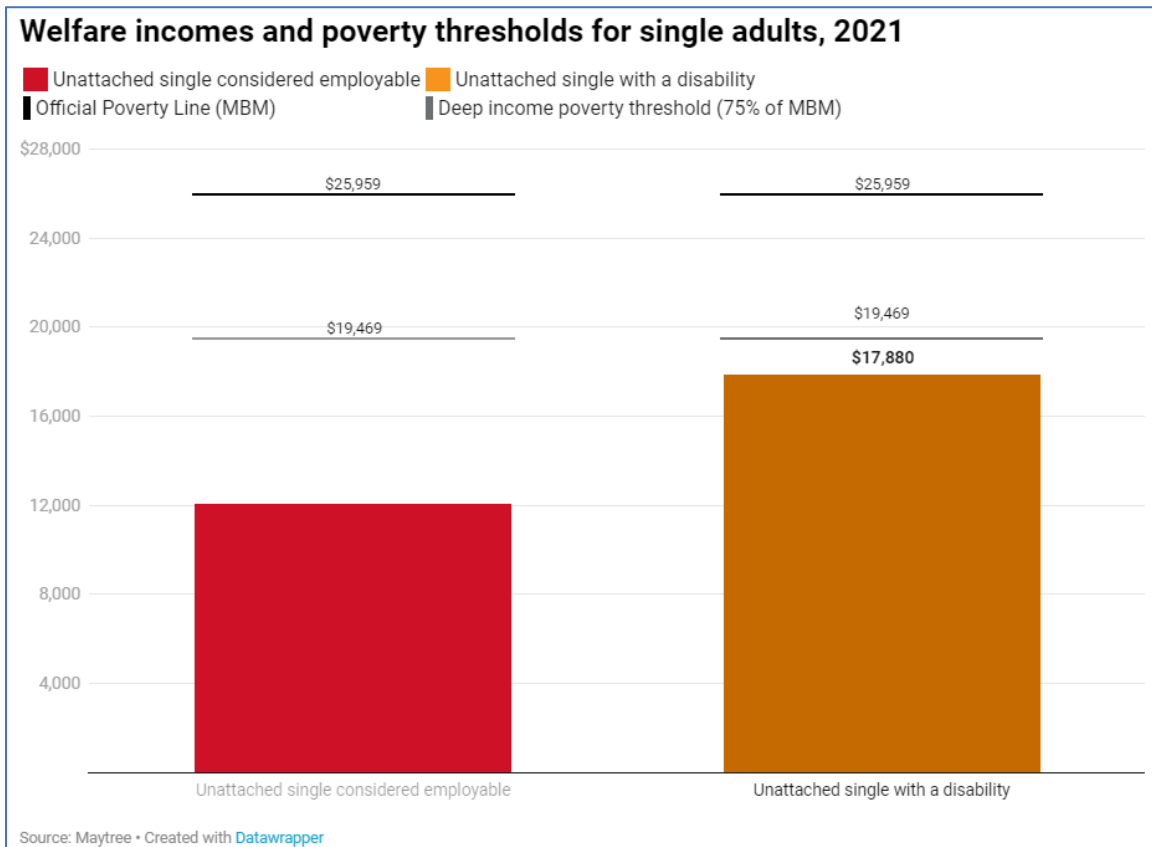
The engagement platform for the poverty reduction strategy identifies inflation as one example of an event emerging since the 2019 release of Together BC. The recent period of high inflation has certainly had pronounced financial impacts that have been disproportionately felt by low-income community members with limited or no capacity to take on additional costs. However, to characterize inflation as a recent event is to distort the fact that government intends for there to be “a persistent rise over time in the average price of goods and services”.² Inflation is built into the very fabric of our economic system, with one glaring exception – British Columbia does not index its system of social supports.

We appreciate the announced increases to the shelter allowance rates; those supports will help bridge the gap between our poverty supports and what we have accepted as a national poverty line (such as for

¹ <https://www.radionl.com/2022/11/17/96534/>

² <https://www.bankofcanada.ca/rates/indicators/key-variables/inflation-control-target/>

the groups identified below).³ However, true relief for both support recipients as well as support providers would be to have the province guarantee long-term support levels by indexing rates to the cost of living at levels that mitigate the escalating demand on poverty mitigation efforts (e.g. subsidizing housing, food, clothing, etc.).



Basic social assistance in Quebec, New Brunswick, and the Yukon^{4,5} are indexed to reduce the need for review-period delays or political compromises at half measures in providing the basic standard of living these systems are designed to provide. The Canada Child Benefit (CCB) changes annually (as do associated cut-offs).⁶ The same is true of the Canada Pension Plan, whereas the Old Age Security benefits switched to a quarterly indexation in 1973 – “at that time, inflation was very high (particularly for energy and food), so the government believed that quarterly indexation would provide better protection against unexpected sharp increases in prices over the year”.⁷ The resulting shifts presented in the Library of Parliament summary illustrate the resulting minimization of lags between rising Consumer Price Index and associated increases in financial supports.

³ Maytree: Welfare in BC <https://maytree.com/welfare-in-canada/british-columbia/>

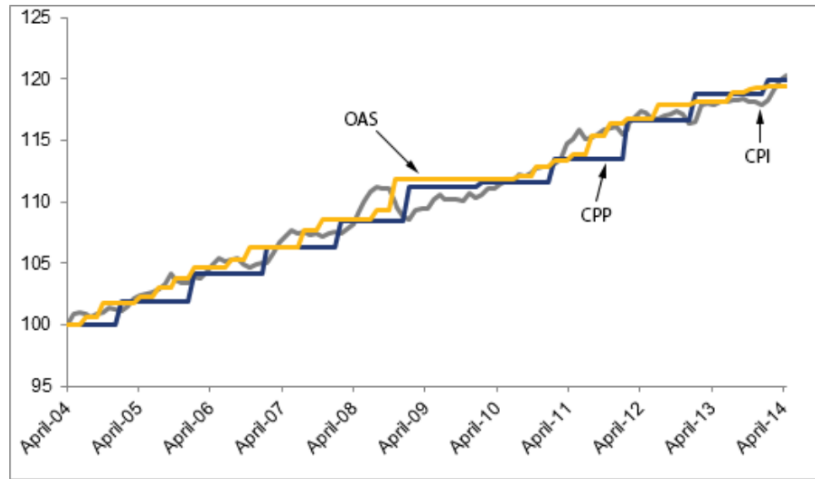
⁴ <https://www.policyschool.ca/wp-content/uploads/2022/07/HSP104-Inflation.Kneebone.Wilkins.pdf>

⁵ https://maytree.com/wp-content/uploads/Welfare_in_Canada_2021.pdf

⁶ <https://www.canada.ca/en/revenue-agency/services/child-family-benefits/canada-child-benefit-overview/canada-child-benefit-calculation-sheets.html>

⁷ https://lop.parl.ca/sites/PublicWebsite/default/en_CA/ResearchPublications/201174E

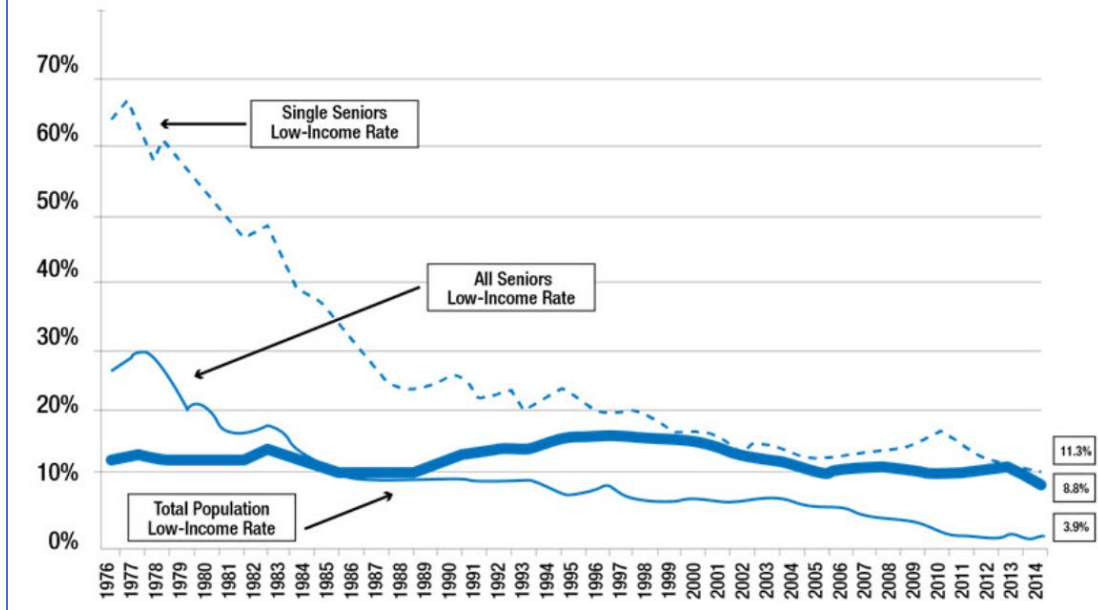
Figure 1 – Consumer Price Index and Indexed Canada Pension Plan and Old Age Security Benefits (April 2004 = 100)



Note: OAS = Old Age Security, CPP = Canada Pension Plan, CPI = Consumer Price Index.

These supports seem to have raised thousands of Canadian families and seniors⁸ just above the poverty line; hopefully the indexation of these supports will have helped mitigate the inflationary pressures coming out of the COVID-19 pandemic.

Figure 3: Percentage of seniors (aged 65 and older) in low income, 1976-2014
(Low income cut-offs – After tax, base year 1992)



⁸ <https://www.canada.ca/en/employment-social-development/programs/poverty-reduction/backgrounder.html>

Call to Action

100 More Homes Penticton and other networks and individual agencies across the province are committed to doing our part to coordinate local actions to improve access to available local supports to reduce poverty. We also remain committed to our efforts to mitigate the impacts of poverty that remains, including through the provision of food, clothing, shelter, and other basic needs. However, further comprehensive efforts on the part of the province to reduce poverty and promote resiliency is required to keep local support systems running in a sustainable way. Some potential options moving forward include the following items.

- Social Assistance Benefits (Ministry of Social Development and Poverty Reduction):
 - Ensure that Income Assistance benefits continue to increase proportionate to the cost of living – regardless of whether that inflation is above or at the target rate – by indexing benefits at least to the Market Basket Measure thresholds as recommended by the BC Expert Panel on Basic Income,⁹ or through an equivalent or more regionally specific method.
 - Accordingly, earning thresholds and any other associated figures should also be tied to inflation.
- Rental Supplements (BC Housing):
 - Boost the rates for rental supplements, including the Homelessness Prevention Program (HPP), the Rental Assistance Program (RAP), the Shelter Aid For Elderly Renters (SAFER), and now the Supported Rent Supplement Program (SRSP). The scope of the increase should be based on the level of diminishing returns in the prevention of homelessness, while considering the already-stretched capacity of the broader support sector (particularly if that supports a “whatever it takes” approach for those who are housing ready).
 - Those rates should then also be indexed to account for increases in the cost of living, recalling that this is a distinct population of service recipients. Rent supplements could plausibly be indexed to the rent increase limits that the province itself sets.¹⁰
 - Immediate action should be taken to bring other rental assistance levels to match that of the Canada-BC Housing Benefit / Supported Rent Supplement Program.
 - As with social assistance, the income thresholds for rent supplement eligibility should also be tied to inflation.
 - Lastly, while it is reasonable that different programs have different eligibilities (as they have in theory target different populations), not all programs account for family size or regional variations (e.g. the province-wide RAP income threshold, compared to a zone-based approach for SAFER, and thresholds by family size for CBCHB). We would suggest a review be conducted on all legacy programs’ eligibility assessment, and that reasonable efforts are made to consider the impacts of family size and / or location.
- Implementation Report on all 65 BC Expert Panel Recommendations:
 - The BC Expert Panel on Basic Income provided 65 recommendations to enhance BC’s

⁹ https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf#page=498

¹⁰ <https://www2.gov.bc.ca/gov/content/housing-tenancy/residential-tenancies/during-a-tenancy/rent-increases>

system of income and social support programs, in lieu of a guaranteed basic income.¹¹ Since the recommendations were issued together, it would be useful know the progress in implementing each item. If any remaining actions can't reasonably be included in the updated 2024 Poverty Reduction Strategy, we'd like to know whether alternative options are being pursued to accomplish the same goals.

We encourage the government to act as swiftly and as fully as possible, as every delay or half-measure can drastically alter the life trajectory of our vulnerable community members.

In closing, we would also like to acknowledge the dedicated efforts of our member organizations, of organizations in other communities, and of our governmental and community partners in working to address poverty across BC communities. Reducing poverty continues to represent a complex challenge requiring creative, collective action. We celebrate the actions taken to date, but today we implore provincial leadership to stay the course in hopes that sustained efforts to reduce poverty can in turn relieve some of the pressures facing community-based organizations whose work is to mitigate the consequences caused by poverty.

Yours in partnership,

100 More Homes Penticton

Kyler Woodmass

100 More Homes Strategy Coordinator, Community Impact & Investment

(Main) 250.860.2356 | (Direct) 236.429.6289

United Way British Columbia | Southern Interior

¹¹ https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf#page=50

I am writing to you on behalf of the 411 Seniors Centre in Vancouver B.C. The 411 Seniors Centre was founded in 1977. We are an organization dedicated to the well-being of those aged 55 and older. We are community hub where seniors meet, socialize, learn, laugh and organize around issues important to seniors.

The 411 Centre also runs a robust Information and Referral program where seniors assist other seniors on a number of issues. These range from applying for Old Age Security, and SAFER to assisting homeless and precariously housed seniors. We assist seniors to apply for housing and Pharmacare. We also answer a great deal of questions from seniors. We also run an annual free Income Tax clinic.

We have just moved into our new purpose built seniors Centre at 3902 Fraser Street in Vancouver and are very excited about this. You are invited to visit us.

In our experience poverty is gendered, racialized, and further complicated by length of time in Canada, literacy, mental health, etc seniors centres are ideally positioned to develop and implement interventions or programs that aim to help specific groups of people.

While the 411 Seniors Centre is open to and assists a wide and diverse range of seniors, many of our members and people who seek assistance from us are low income seniors.

This is why we are pleased to make a submission re poverty reduction. Our focus is on seniors.

1. What are the main factors contributing to poverty in your community today? What groups are most affected and why? For many seniors the main factors contributing to poverty include but are not limited to:

- Low wages earned during periods of work
- Lack of workplace pensions
- Absence from the workforce due to family obligations, health, disability etc.
- Ageism
- Lack of adequate affordable housing for seniors
- High cost of housing
- Increasing costs of food
- Costs related to healthcare including prescription medication, dental and assistive devices
- lack of protection for renters; unmanageable rental rates that are not in line with pensions and benefits and low SAFER rates
- high costs of homecare
- high cost of transportation

- lack of protections and available benefits for immigrant seniors who are reliant on sponsors
- lack of appropriate housing especially for seniors who use assistive devices (i.e., no available units in buildings with elevators)

Groups that are the most affected include:

- women (intersection of sexism and ageism; historically women have had less time in the workforce to build pensions due to family and other care giving roles, when in the workforce they earn less)
- immigrant seniors with significant language barriers (isolated and reliant on sponsors)
- seniors with disabilities

2. How have events since 2019 (e.g. COVID-19, inflation, climate change, etc.) impacted people in poverty in your community? Yes. COVID-19 has shown the vital importance of community based non profit senior serving organizations, including seniors' centres. Without the work of these organizations seniors would have been more isolated, would have lacked access to healthy food and other nutritional supports, and would be in more distress.

Inflation and climate change have had major impacts on the seniors the 411 Seniors Centre speaks with. They are:

- The cost of food has increased meaning that many seniors have become food insecure and cannot purchase healthy food.
- The cost of medication, dental, and other basic health supports have increased meaning that many seniors cannot afford their medication, cannot see a dentist, and cannot afford hearing aids etc.
- Housing has become much more precarious. Rents have increased, seniors' homelessness has increased, and seniors are much more stressed about their housing. The need for affordable, safe housing for seniors has increased.
- Inflation also means that housing for many seniors has become more uncertain. Many seniors who rent have been long term tenants in their buildings. As a result they pay less rent than other tenants. These seniors are worried that they will be pressured to leave their tenancy, renocted or demovicted.
 - many buildings do not have air conditioning and seniors are unable to afford to buy and transport air conditioning units

-isolation during pandemic and digital divide meant many seniors were without any social or civic connection (not able to communicate with friends and family, not able to make use of online delivery programs, use internet to access up-to-date information)

During the time of the pandemic seniors centres acted as trusted sources of information

3. The 2017/2018 engagement process showed us that we needed the following changes, which we have made:

- Annual increases to the minimum wage
- Increases to income assistance and disability assistance rates
- Housing affordability measures
- Eliminating interest on B.C. student loans
- Removing Medical Services Plan premiums, among others
 - Which of these or other changes has had the biggest impact, and how?
For many seniors removing Medical Service Plan premiums have had an impact. However, given that many of the seniors were receiving premium assistance the impact was less widespread.
 - The lack of affordable, accessible, safe and appropriate housing for seniors remains a critical issue.
 - The lack of long term core funding for senior centres and other non profit senior serving organizations is also an important issue.
 - In the context of an urban centre like Vancouver, we did not see any real impact on poverty due to changes in income assistance, disability assistance rates and housing affordability measures

4. What additional changes could the B.C. government make that would have the biggest impact in addressing poverty and why? What should we do first?

- For seniors three additional changes would create substantial impacts. They are:

- Providing long term core funding to seniors centres and other community based non profit senior serving organizations
- Providing affordable , safe, appropriate and accessible housing and increasing SAFER rates
- Reducing the costs of public transportation for seniors
- Providing dental care, and assistance for other devices such as hearing aids, scooters etc.
- It is crucial to address the digital divide. So much information the government provides is digital, but according to the BC Seniors Advocate about 32% of low income seniors do not have access to the internet at home. The Seniors Advocate also found that close to 70 % of low income seniors are not confident completing on line forms or applications.

5. How can we help people learn about and access the supports that are available for them?

Provide long term core funding to seniors centres.

The Provincial Government does not sufficiently address the social service needs of seniors (e.g. I&R, social isolation, etc.) leaving them with anxieties or struggles that are best served by seniors centres.

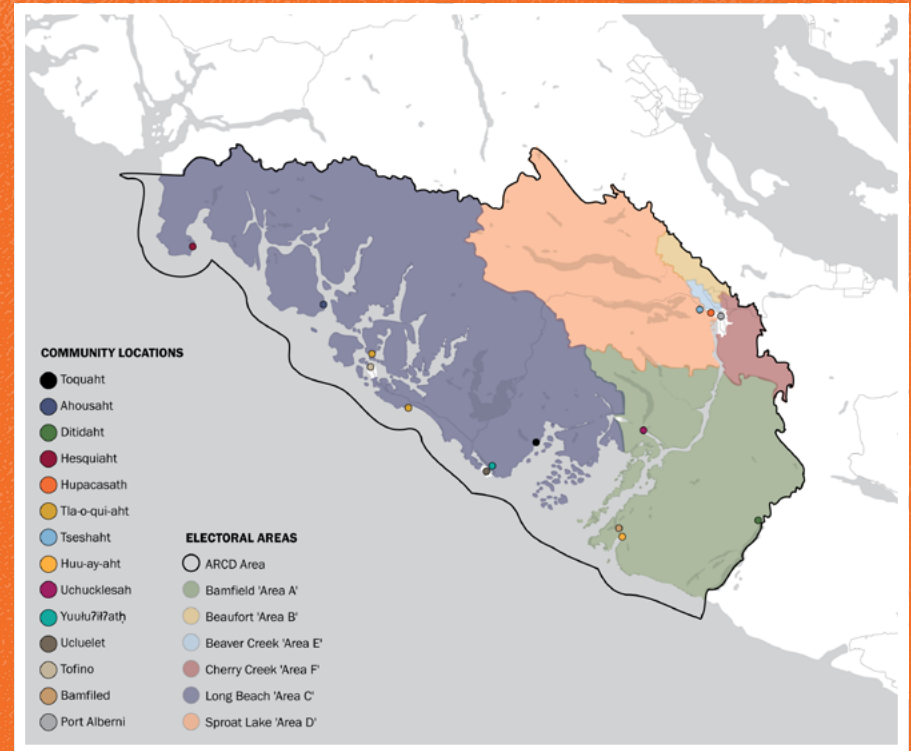
Address the digital divide. Provide paper information.

6. What are your top 3 priorities for addressing poverty over the next five years? Over the longer-term?

- Providing long term core funding to seniors centres and other community based non profit senior serving organizations
- Providing affordable , safe, appropriate and accessible housing and increasing SAFER rates
- Providing dental care, and assistance for other devices such as hearing aids, scooters etc

EXECUTIVE SUMMARY


The Alberni Clayoquot Regional District is a geographically diverse area which spans 6904 km². All together, the ACRD has a population of over 30,000 people. The ACRD is located in the traditional territories of the Nuuchahnulth speaking peoples, the ten Nations of the Ditidaht, Huu-ay-aht, Hupacasath, Tseshaht, Uchucklesaht, Ahousaht, Hesquiaht, Tla-o-qui-aht, Toquaht, and Yuu-cluth-aht peoples who have territories and communities within this region. The ACRD includes the City of Port Alberni, Municipalities of Ucluelet and Tofino as well as the six electoral areas of Bamfield, Beaufort, Long Beach, Sproat Lake, Cherry Creek, and Beaver Creek.



MAP Alberni Clayoquot region map.

THIS PLAN


Building Prosperity Action Plan outlines poverty reduction strategies and areas of focus for the Alberni Clayoquot communities to direct attention in order to see real meaningful change.



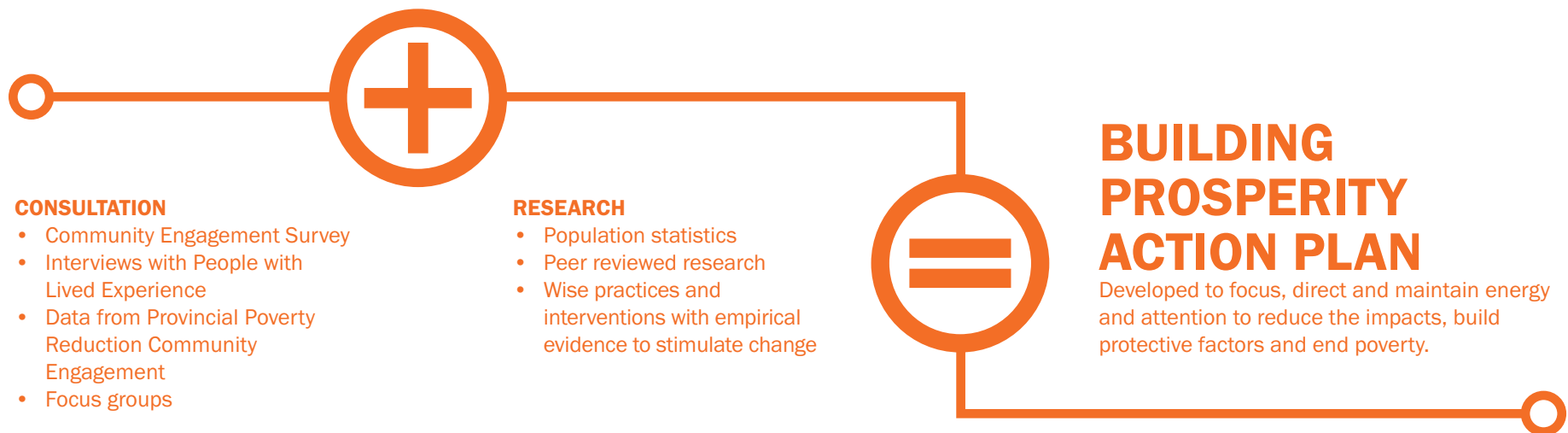
OUR CHALLENGE

- 21% of all residents live in poverty
- 1880 children experiencing poverty with a 15% poverty rate for children in two parent homes and a 62% poverty rate for children in lone-parent families
- Low median income: \$49,679 in 2015, with a growth rate of 2.3%, compared to the 2015 BC median income of \$61,280, with an 11.5% growth rate
- High cost of living: 47% of renters spending more than 30% on shelter
- Housing crisis: low vacancy rate and hot housing market

PRIORITY POPULATIONS
Statistics and information in this plan point to specific attention to:

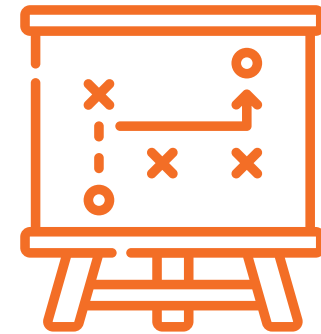


- Youth and young families
- Single parent families
- Individuals earning below a 'living wage'
- Populations which experience higher levels of stigma and racism



RECOMMENDATIONS

Summary of recommendations for Prosperity Building in the Alberni Clayoquot Regional District:



INCOME

- Advocate for the adoption and implementation of systemic reforms outlined in the Guaranteed Basic Income Panel findings
- Advocate for adoption of Living Wage
- Advocate for the continuation and implementation of childcare supporting funds and initiatives
- Advocate for Provincial and Federal interventions to decrease the financial burden of advanced education
- Increase access to technology
- Increase access to basic needs and ensure availability of necessities
- Support initiatives which increase access to healthy foods

HOUSING

- Joint regional advocacy to Provincial and Federal governments to align housing strategy, policy and resources to meet actual community need.
- Implement a regional or sub regional housing authority
- Implement a person-centered approach to support individuals in need of housing supports

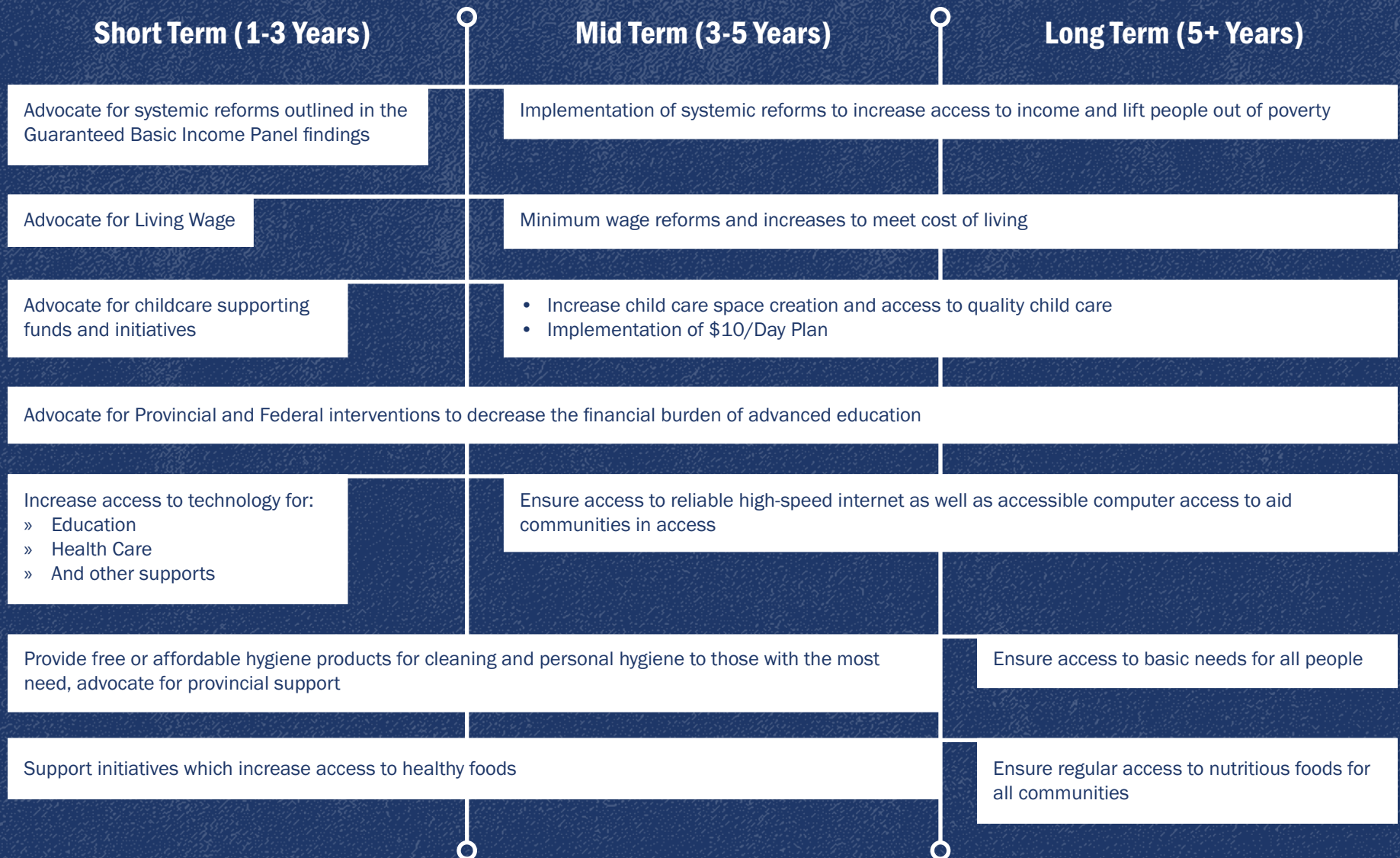
HEALTH, MENTAL HEALTH AND ADDICTIONS

- Support local partners such as the Divisions of Family Practice and Community Action Tables to advocate and support patient centered care and harm reduction programs
- Advocate and support funding mechanisms which will enhance individuals access to treatment and care

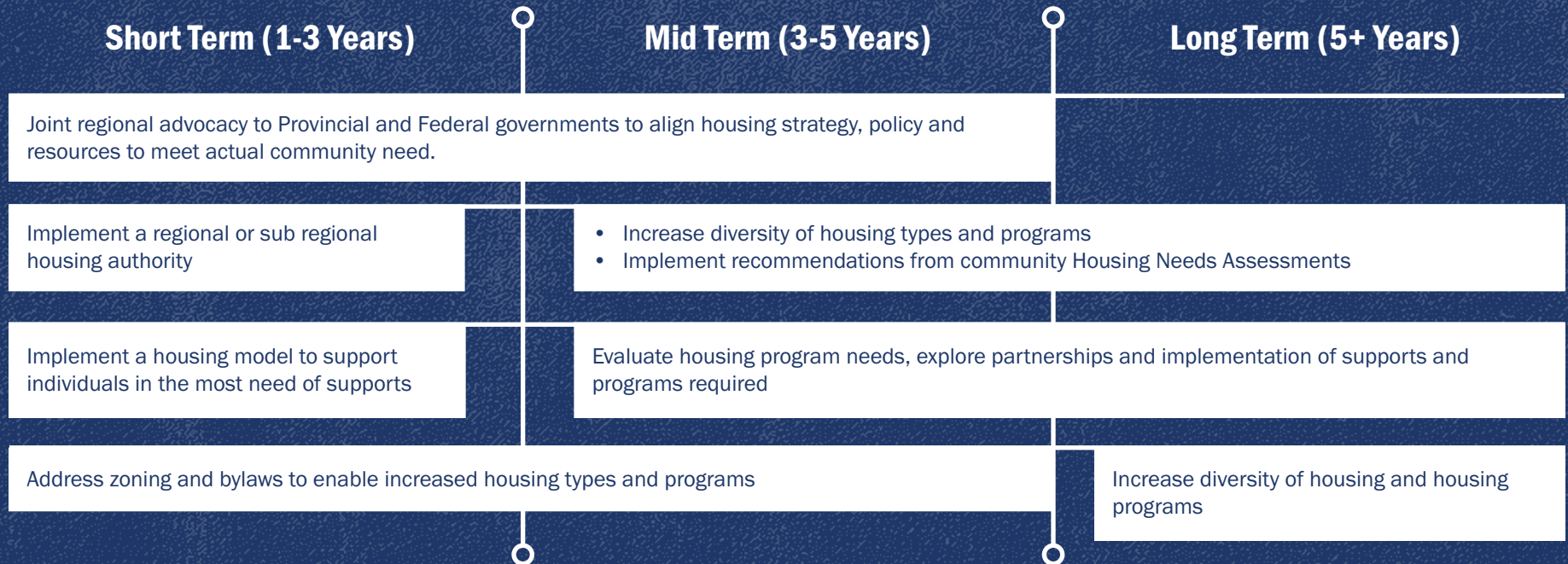
BUILDING EQUITY

- Adopt an equity lens for planning, engaging and prioritizing the needs of those most effected in decisions
- Increase community education and action around the Truth and Reconciliation Calls to Action and United Nations Declaration of Indigenous People
- Support training and interventions in health, social and mental health supports which address stigma
- Support interventions and solutions which ensure protective factors such as shelter, basic needs, and income are accessible.
- Creation of a regional Poverty Reduction Table which promotes education and stigma reduction, advocates for actions outline in the Action Plan

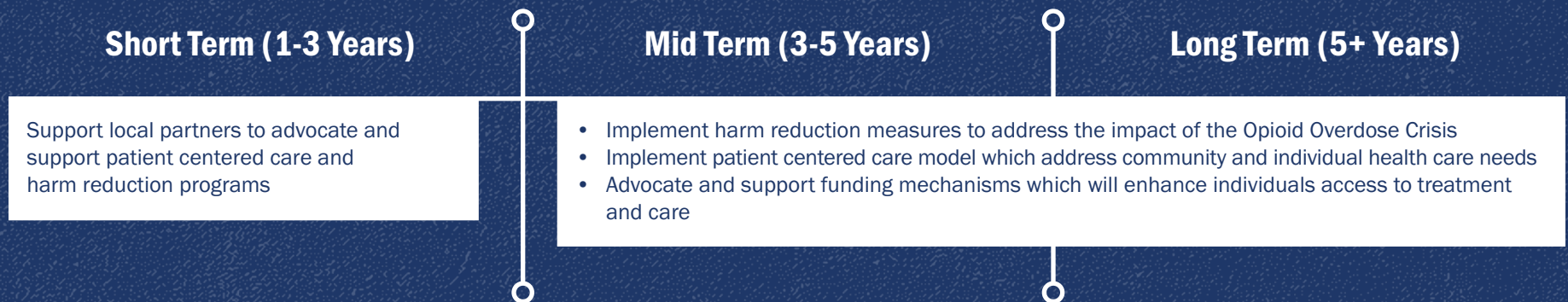
INCOME



HOUSING



HEALTH, MENTAL HEALTH AND ADDICTIONS



BUILDING EQUITY

Short Term (1-3 Years)

Mid Term (3-5 Years)

Long Term (5+ Years)

Adopt an equity lens for planning, engaging and prioritizing the needs of those most effected in decisions

A human rights-based equity framework to impact:

- » Housing supports and affordability
- » Income supports
- » Community transit
- » Access to goods, services and resources
- » Community health, social, mental health and addictions programs

Increase community education and action around the Truth and Reconciliation Calls to Action and United Nations Declaration of Indigenous People

Work along side community stakeholders to move from discussion of reconciliation to meaningful action in the implementation of the 94 recommendations

Training and interventions in health, social and mental health supports which address stigma associated with mental health, race, gender or income

Training and interventions in health, social and mental health supports which address stigma for individuals experiencing mental health and addictions, or stigma associated with race, gender or income

Ensure protective factors such as shelter, basic needs, and income are accessible

Increase access to basic needs and food services with a priority around those most in need including rural and remote communities

Regional Poverty Reduction Table which promotes education and stigma reduction, advocates for actions outline in the Action Plan

Conduct further action planning for dimensions outlined in the Action Plan, move forward and/or track actions taken and evaluate progress



April 13, 2023

Ministry of Social Development and Poverty Reduction
PO Box 9058 Stn Prov Govt
Victoria, BC V8W 9E2

Via email: BCPovertyReduction@gov.bc.ca

We are writing on behalf of Battered Women's Support Services (BWSS).

Battered Women's Support Services provides education, advocacy, and support services to assist survivors experiencing gender-based violence. We work from a feminist perspective to eliminate gender-based violence and to promote gender equity. For over forty years, we have been working towards ending violence against women, girls, femmes, 2SLGBTQIA+, and non-binary survivors of violence. Our specialized services team provides crisis intervention, legal advocacy, counselling, and information and referral services. We also provide violence prevention and intervention services, as well as community education and training programs to end gender-based violence.

As a frontline anti-violence organization, every day we observe the detrimental impact of poverty on survivors of gender-based violence.

Feminization of Poverty and It's Impacts on Survivors

We use the term "feminization of poverty" to highlight the unique, specific, and disproportionate ways in which poverty is gendered due to the intersection of cisheteropatriarchy, precarity, and impoverishment. As [researchers note](#), "the feminization of poverty refers to the process in which deep-seated and multidimensional cultural, social, and structural factors cause and exacerbate poverty among women and girls."

Some of the unique, systemic barriers that keep women and gender-diverse people locked into systemic cycles of gendered poverty include:

- [Economic abuse](#) in a relationship restricts a survivor's ability to acquire, use, and maintain economic resources. It is a form of coercive control that involves the control, exploitation,

and/or sabotage of a survivor's livelihood, preventing them from maintaining financial dependence. For over a decade, BWSS has been operating a project called "[Economic Empowerment Strategies for Women: Recognizing and Addressing the Effects of Financial Abuse](#)" and "[Advancing Women's Awareness Regarding Employment](#)" to assess and overcome the [serious](#) physical, social, emotional, and financial impacts of economic abuse, which includes ill-health, isolation, homelessness, and bankruptcy.

- Financial dependence is a significant contributor to gender-based violence. Financial insecurity forces many survivors into the position of choosing between staying with an abusive partner or facing poverty. For survivors with children, especially low-income single mothers, attempting to leave an abusive partner can lead to cascading harms, such as homelessness (often referred to as "[hidden homelessness](#)") or having one's children apprehended.
- Women, youth, and children fleeing domestic violence, intimate partner violence and/or family violence face huge barriers to safe and accessible housing. As noted in the BC Society of Transition Houses Census Survey of 2022, over a 24-hour period, at least [571 women, youth and children](#) across BC who are unsafe in their homes were unable to access life-saving Transition Housing Programs and PEACE Programs. Even for those who can access a transition house for the 30-day period, many end up returning to their abusive partners because of the lack of long-term, affordable housing options. This is especially urgent because [a shadow pandemic](#) is emerging with rates of domestic violence and [femicide](#) increasing across Canada and BC. The latest data shows that [184 women and girls](#) were violently killed, primarily by men, in Canada in 2022. This represents an alarming 27 percent increase when compared to 2019.
- Labour market discrimination, such as the gender pay gap, persists in BC and Canada. Even the [United Nations Human Rights Committee](#) has raised concerns about the high level of the pay gap in Canada and its disproportionate effect on low-income, racialized, and Indigenous women. In addition, systemic racial and gendered barriers to employment – namely, gendered [colonialism](#), [misogynoir](#), [precarious immigration status](#), and a lack of recognition of [immigrants' credentials](#) – means that Indigenous, Black, newcomer immigrant/refugee, and racialized women are most heavily concentrated in underpaid, minimum wage, temporary, and otherwise precarious jobs. Further, according to the Canadian Women's Foundation, [during the pandemic](#), women were more likely to lose their jobs than men and suffer through unemployment.
- Unpaid domestic work and caregiving responsibilities within the family, including but not limited to child rearing and caring for older dependents, disproportionately falls on women. This further impacts economic security and is a key contributor to the feminization of poverty. Just over [three-quarters](#) of those working part-time in Canada were women in 2015, and one-quarter of women working part-time said their reason for doing so was to care for children.

These structural barriers are magnified for Indigenous women, Black women, racialized women, newcomer immigrant/refugee women, women with disabilities, youth, and trans and two spirit people who are enduring the intersections of multiple forms of oppression and discrimination. Especially for Indigenous mothers and families, gendered colonialism and poverty has resulted in the ongoing overrepresentation of [Indigenous children in BC's child welfare systems](#) and intergenerational forced family separation.

Top Three Priorities for Ending the Feminization of Poverty

Poverty is not an individual failure; it is a policy choice that is manufactured and maintained in our current capitalist, settler colonial, patriarchal, and oppressive system. Moreover, as British Columbia's Officer of the Human Rights Commissioner [has stated](#), "high rates of poverty in the province violate B.C.'s obligations to respect people's right to an adequate standard of living as enshrined in international law."

As a decolonial, anti-racist, and intersectional feminist organization with a vision of gender equity, BWSS has three top priorities to eliminate poverty and to prioritize the safety of all survivors in BC (regardless of their immigration or citizenship status).

1) B.C. must fund evidence-based, upstream, preventive measures that eliminate poverty as a key condition of vulnerability for gender-based violence.

"All the government systems work in concert with each other. Housing with income assistance with child welfare are working in concert to sustain the cycle of poverty. Housing providers limit the agency and autonomy and uphold white supremacy. The income review process is also getting more and more stringent with B.C. Housing and it is set up to keep women in poverty. If you spend \$10 on beer, your housing provider can scrutinize you, with all these occupancy standards, and never mind if you have a child or children. Women are judged, penalized, up to having their children removed. And housing providers assigning a primary tenant means that if she is Black and he is white, he has all the power. The things you have to do as a single Black woman with children! But if you have a job under the table to survive, then that extra money is now income and gets clawed back. These systems uphold white supremacy and the poverty cycle."

– Worker of colour statement in our [Colour of Violence](#) report, 2022.

The [Public Health Agency of Canada](#) recognizes that, "Poverty and violence play a kind of toxic dance in women's lives. Poverty marginalizes women, increasing their risk of victimization, while violence also isolates women, as the mental and physical effects grind away at women's sense of well-being, limiting what is possible. The combined effects of poverty and violence create a formidable barrier to women's equality, well-being and full participation in society. Both reflect unequal relationships of power which result in the systemic discrimination of women."

Survivors deserve access to free, universal, accessible, and culturally safe housing, childcare, transportation, jobs, economic resources, and anti-violence supports for themselves and their families.

- B.C. must implement all the Calls to Action in the [Truth and Reconciliation Commission of Canada: Call to Action](#), and all the Calls for Justice in [Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls](#).
- A provincial Poverty Reduction Strategy must include all relevant elements of the [Roadmap for the National Action Plan for Violence Against Women and Gender-Based Violence](#). It must prioritize full, wrap-around, timely, reliable, and inclusive supports for survivors of gender-based violence in the form of full core funding (not simply program funding) for anti-violence services. Survivors experiencing

multiple forms of oppression require access to fully funded anti-violence services committed to intersectional service delivery.

- B.C. must ensure livable social assistance, disability, pension, Extended Family Program, Child in the Home of a Relative Program, and crisis grant rates that adjust for inflation for all survivors, especially for [seniors](#), [those with disabilities](#), and [Indigenous families](#). We support the [Raise the Rates campaign](#), calling attention to how assistance rates in BC remain below the poverty line.
- B.C. must guarantee that subsidized, quality, family housing is made available immediately throughout the province, including on-reserve, and upon need in survivors' communities of choice, near their support networks. We need a massive provincial funding investment into a provincial housing plan to reverse the current housing crisis. This includes permanent housing, as well as transition homes and second-stage housing.

The intersection of poverty, gendered violence, and lack of affordable housing is a key and urgent site of intervention in the struggle for gender equity.

"It's been horrible. The ways it's been horrible is financially, the rent increase, the lack of safe houses, the fact that my kids have disabilities has also been a setback. Moving into the place I lived in before was super small and crowded. Now the place we live in is big but overpriced. There's no way of being able to do any of it. It was already short before, I tried to flee the relationship more than once in many years and before COVID it was almost easier.

- Indigenous survivor of intimate partner violence statement in our [Road to Safety report](#), 2022.

- B.C. must fund free public transit in all regions, as well as free, on-demand emergency transportation for women, 2SLGBTQIA+, and non-binary survivors fleeing intimate partner, domestic, sexualized, or gender-based violence. This transportation system needs to be fully funded across the province and available 24/7 upon immediate request and provided for short and long distances.
- Publicly funded, publicly provided universal basic services that are trauma-informed and anti-oppressive in their delivery models. This includes free and universal services such as childcare, healthcare, dental care, mental health supports, internet access, public transit, healthy school food program in the K-12 school system, employment programs.

2) B.C. must prioritize ongoing, annual funding for legal aid services for family law and child protection matters.

BWSS was shocked and disappointed that the [BC Budget 2023](#) made no commitments to vital, life-saving services such as legal aid or family law access. Currently, [three out of every five applications for family law legal aid representation are denied](#). For survivors of gender-based violence, especially low-income racialized mothers, these ongoing gaps in legal aid service delivery for family law and child protection matters create serious barriers to accessing justice, while forcing them further into a cycle of poverty.

No survivor in B.C should sacrifice their safety, the best interests of their children, or their financial security to flee and separate from an abusive partner. It is for this reason that BWSS strongly

recommends that an updated Provincial Poverty Reduction Strategy urgently prioritize fully funding legal aid representative services for family law and child protection issues. We emphasize that funding of non-profit legal services does not replace the need for full, individualized, and direct legal aid representation for family law matters. When fleeing violence, the complexities and stresses of navigating a legal system without legal counsel is an intimidating and traumatic burden, and becomes a significant barrier to seeking safety, to accessing justice, and to securing financial independence.

Specifically, an updated Provincial Poverty Reduction Strategy should increase funding for family law legal aid, raise the financial eligibility cut-off for legal aid, and increase the number of legal aid hours that are available. Further, access to legal aid representation must be timely. As [West Coast LEAF notes](#), the longer family law matters go on without resolution, the greater the risk of serious family violence. For Indigenous mothers, the risk of child apprehension is always looming in family law matters. Access to fully-funded, timely, accessible, culturally-safe legal aid services would mitigate against the injustice of the colonial child welfare system, which the [Truth and Reconciliation Commission \(TRC\) explains](#) "continues the assimilation that the residential school system started."

3) **B.C. needs intersectional pay equity legislation**

Women, trans, and two spirit people are systematically underpaid for work of equal value, compared to the wages their male counterparts earn. Indigenous women, Black women, racialized women, newcomer immigrant/refugee women, women with disabilities, and trans and two spirit people face compounding discrimination in employment, and the greatest barriers to pay equity. For example, racialized women make approximately [59.3 percent](#) of what white men make in the workforce. This cements a lifetime, and often a generational cycle, of both the feminization and racialization of poverty.

BC remains as one of four provinces that does not have pay transparency or pay equity laws. Last year, the BC government began the process of developing pay transparency legislation. However, pay transparency legislation is distinct from pay equity legislation. Without pay equity legislation to ensure that employers actually change their pay practices and provide equal pay for work of equal value, pay transparency is limited. This is why we reiterate our call, along with 100 other organizations and individuals, that BC must enact [intersectional pay equity legislation](#) that enshrines in law the responsibility of all employers to identify and close gaps in pay for work of equal value.

In addition to intersectional pay equity legislation, the province needs a whole-of-government approach to end the feminization poverty, especially in the labour market. This includes government interventions to end systemic racial and gendered labour market discrimination – such as employer harassment, wage theft, deskilling, and contract flipping – especially for Indigenous, Black, and newcomer immigrant/refugee women in the workforce. It also includes reversing a long trend of economic restructuring towards austerity that continues to disproportionately impact racialized and/or disabled women and single mothers, forcing them into precarious, underpaid, and/or part-time work.

[BC has committed to](#) “develop an action plan to help prevent, address and respond to gender-based violence.” In our work on the frontlines of supporting survivors, we know that safety changes everything. **We urge the province to adopt a provincial poverty reduction strategy that incorporates an [intersectional GBA+ analysis](#), and, further, to adopt a provincial GBV plan that incorporates upstream, anti-poverty solutions to prioritize the safety, wellbeing, and economic security of survivors.**

TogetherBC: B.C.'s Poverty Reduction Strategy Update

SUBMISSION BY THE BC ALLIANCE FOR HEALTHY LIVING

The BC Alliance for Healthy Living (BCAHL) is pleased to submit this paper to the BC Government for consideration in the update of BC's Poverty Reduction Strategy. We applaud the government for its commitment to poverty reduction, for the progress that has been made and for efforts to consult and engage with a broad cross-section of civil society including those with lived experience.

BCAHL is an Alliance of ten provincial organizations who started working together in 2003, to advocate for healthy public policy that would address the common risk factors and health inequities which contribute significantly to chronic disease. BCAHL has long championed poverty reduction measures because of the strong connection between socio-economic status and health.

Approximately one in three British Columbians (32%) live with one or more diagnosed chronic conditions. Although, it is estimated that between 50% and 80% of this disease burden is avoidableⁱ, British Columbians who live in our poorest communities are between 24% and 91% more likely to die early from chronic diseases, including from cancer (24%), respiratory diseases (53%), circulatory diseases (65%) and diabetes (91%).ⁱⁱ Many of the risk factors for chronic disease such as smoking, alcohol, inactivity and an unhealthy diet are concentrated in populations with low socio-economic status, but poverty also affects risk for chronic disease independently from these behavioural risk factors. This is believed to come largely from physiological responses to high levels of toxic stress and trauma among those who live in poverty.ⁱⁱⁱ

The relationship between social inequities and health outcomes is not only causal but it is also bi-directional. Populations living in poorer social conditions have higher rates of chronic disease and through periods of ill health, individuals with chronic disease can lose the security of adequate income and social supports.

Population health data clearly shows that as socio-economic status improves, so too do health outcomes. Investment in the Poverty Reduction Strategy is an investment in health promotion and chronic disease prevention and an opportunity to control the growth of future healthcare costs.

As a health organization, BCAHL sees poverty reduction through the lens of the social determinants of health. Outlined below are the key areas that require policy action and investment if British Columbia is going to be successful in its poverty reduction strategy; these include: income security, early childhood development, childcare and family supports, affordable housing, education and literacy and public transportation.

INCOME SECURITY

While we recognize there has been progress made in this area, there are still far too many individuals and families who struggle to make ends meet. This has been exacerbated by the extremely high rates of inflation that are further squeezing those who survive on incomes below the poverty line. The emergency benefits brought in during the pandemic demonstrated how effective income assistance can be in lifting families out of poverty. For example, according to First Call's 2022 BC Child Poverty Report Card, "Between 2019 and 2020, child poverty in BC decreased by 26.1%, representing the largest one-year decrease in child poverty rates since 2000".^{iv}

With food costs rising at historic levels, we need to ensure that our most vulnerable British Columbians have adequate income to be housed and to eat a basic healthy diet. According to the Canada's Food Cost Report, in the coming year, basic groceries are estimated to go up between 5-7%, an increase of approximately \$970 for a family of four (that is for a total of \$14,767). The literature shows food security is best solved with poverty reduction measures. Income supports such as the Canadian Child Benefit and Guaranteed Income Supplement, have contributed to improvements in household food insecurity.^{v,vi,vii}

Moving ahead, BC can build a stronger system of support for persons with disabilities, special needs, children at risk, and seniors by ensuring that income assistance rates are based on, and keep pace with, the actual cost of living. BCAHL also supports regular, predictable raises in the minimum wage that are indexed to inflation so that work provides a path out of poverty.

Another issue intimately tied to income security is job-protected illness leave. Currently, the federal Employment Insurance program offers temporary financial assistance, or sickness benefits, to unemployed workers. This assistance includes providing sickness benefits to people unable to work because of illness, injury, or quarantine. In November 2022, the federal government extended the EI sickness benefit from 15 weeks to 26 weeks.

However, while income support is covered under the EI program and present and future paid-sick leave provincial programs, it is solely up to each province and territory to determine the length of jobprotected leave for employees who are sick. In BC, the *Employment Standards Act* currently provides only 5 days of paid and 3 days of unpaid, job-protected leave annually. Many British Columbians requiring treatment for chronic diseases or long-term illness such as cancer require time off from work which extends well beyond the current job-protected leave in British Columbia. For example, the average length of treatment and recovery is between 26 and 36 weeks for breast cancer and 37 weeks for colon cancer – two of the most common types of cancer in Canada. British Columbians should not have to choose between receiving treatment and working.

RECOMMENDATIONS:

- Base income and disability assistance rates on the Market Basket Measure to ensure they are adequate for providing healthy basics and indexed to inflation. Following the recommendations of the [‘Expert Panel on Basic Income’](#) this would mean increasing:
 - a. for single people in the Severe-Persistent Disability, Moderate-Persistent Disability, and Temporarily Unable to Work categories by \$500 per month, to \$20,196 annually, and
 - b. for couples and other family types proportionately. For couples in which both people have a disability use a scale factor of 1.41, for an annual benefit amount of \$28,560.”^{viii}
- Increase earning exemptions so that income and disability assistance recipients can gain the benefits of employment and work experience with transitional support.
- Remove the barriers that discourage, delay and deny people from accessing income and disability assistance since it functions as a last resort support.
- Provide regular, predictable raises in the minimum wage and index to the rate of inflation.
- Use the GST tax credit, BC low-income climate action tax credit, child benefits and other tax credit measures to lift people above the poverty line.
- Work with the Ministry of Labour to:
 - a. Extend the length of sickness job-protected leave to at least 26 weeks to align with the federal EI sickness benefit
 - b. Allow sickness job-protected leave eligibility criteria to protect people who have recently changed jobs
 - c. Allow leave flexibility by permitting workers to take leave in smaller unites
 - d. Authorize expanded access to leave by regulation and implement routine regulatory reviews

AFFORDABLE HOUSING

We acknowledge that government has made affordable housing a priority and there has been some progress on this issue. However, the demand is high, need is acute, and the cost of housing in BC is what pushes many individuals and families into poverty.

Housing is one of the most basic requirements for health. When people spend excessive amounts of income on housing, fewer resources are available for other health essentials. Studies suggest affordable housing improves health outcomes by freeing up resources for nutritious food and other essentials. It reduces stress, exposure to allergens, neurotoxins and other dangers, and also

provides the stability that enables patients with chronic diseases to access and maintain the level of care they need. From a public health perspective, the most acute manifestation of the housing crisis relates to homelessness.

RECOMMENDATIONS:

- In this area, we support the recommendations put forward by Housing Central to:
 - “Move up \$4.2 billion in housing supply investments so it can be spent immediately. The provincial government has \$4.6 billion planned in housing investments between 2022 and 2028, and the community housing sector has the capacity to use over \$4.2 billion to build over 10,000 affordable homes.”
 - “Support Aboriginal Housing Management Association’s Urban Rural and Northern Indigenous Housing Strategy, allocating funding for the planning and implementation stages of the key actions dedicated to addressing Indigenous housing needs across the province.”^{ix}
- Invest in measures to prevent and eliminate youth homelessness including the creation of affordable, supportive housing options for at-risk and homeless youth with special attention on those with the highest risk, including youth aging out of care, LGBTQ2S+ youth, Indigenous youth and those with mental health or substance use challenges.
- Continue to coordinate the efforts and investments of non-profit organizations, the private sector, and other levels of government to ensure a full spectrum of housing for those in need, including affordable housing, supportive housing, social housing, emergency and transition housing.

EARLY CHILDHOOD DEVELOPMENT, CHILDCARE AND FAMILY SUPPORTS

It is deleterious at all stages of life, but childhood poverty has been shown to have a negative affect on social and health outcomes that lasts across the life course. Rates of poor health, hyperactivity and delayed vocabulary development have been shown to be higher among children in low-income families. To break the cycle of disadvantage, it is critical to take a comprehensive approach and to work upstream and support children and families. Investments in early childhood development, childcare and family supports are investments in long term health and mental well-being.

RECOMMENDATIONS:

- Continue to build on commitments to increase access and affordability of universal childcare, across the province.
- Continue to offer programs such as the Nurse-family Partnership and Nobody’s Perfect Parenting that provide important supports for families that are vulnerable or at-risk.
- Target additional program funding in areas where the data (such as the Early Development Instrument) shows high levels of vulnerability among children.
- Adopt social pediatric models in parts of the province where there are higher concentrations of children living in poverty. Consider adapting the RICH-ER (Responsive, Intersectoral -Interdisciplinary, Child Health - Education and Research) Model which is delivered through a partnership between Child Health BC, Vancouver Coastal Health and local NGOs in the Strathcona neighbourhood of Vancouver. It delivers health care to ‘hard to reach’, ‘disadvantaged’ communities by building respectful relationships and trust and responding to ‘social determinants’ by embedding Nurse Practitioners in community settings where people naturally gather (schools, daycares, community centres) to develop relationships in the community and act as the point of care contact for tertiary and specialist services. Social service agencies and NGOs contribute by helping to address the conditions negatively impacting health such as housing and food insecurity.

EDUCATION AND LITERACY

Education, literacy, and training are acknowledged as vehicles for transcending low socio-economic circumstances including health status. There is strong evidence that those who graduate from high school show significantly better health and family functioning than non-graduates. British Columbia’s public education system already makes considerable effort to engage disadvantaged students and encourage high school completion and post-secondary education but to overcome inequities, opportunities for disadvantaged youth need to be strengthened.

RECOMMENDATIONS:

- Commit and fund additional human resources to support the early identification of students who may withdraw from their education prior to graduation. Provide intensive individualized instruction including the use of tutoring and mentoring programs delivered by teachers interested and trained to work with at-risk students. Provide opportunities to make up work via summer and night school and correspondence.
- Integrate the delivery of child and youth assessment and support services to address substance abuse, teen pregnancy and young parenthood, suicide prevention, counseling and other mental and physical health issues into schools in consultation and coordination with the school and school district administrators, school psychologists and social service / public health agencies.
- Ensure all professionals working with Indigenous and Newcomer students have a proven level of cultural competency and access to specialized training.
- Work with Indigenous communities and educators to bridge the educational gap between Indigenous children and youth to the same level as non-Indigenous children and youth.
- Increase support for low-income students to pursue post-secondary education and vocational training opportunities.
- Review and strengthen support for adult basic education training.
- Increase accessibility of language training programs to enable Newcomers to learn English and for those with some English to increase their proficiency to levels that enable them to function effectively in the workplace, take courses at post-secondary institutions and/or enter licensing programs.
- Increase skills bridging programs to upgrade professional or technological skills and improve coordination between employers, apprenticeship bodies, licensing associations and service providers – making it easier for Newcomers to Canadianize their skills and credentials and increase career opportunities.

TRANSPORTATION

Public transportation is a basic amenity that provides multiple benefits for all but is particularly necessary for those who do not own or are not able to drive their own vehicle. This includes people on limited incomes, those with physical impairments or disabilities, youth and some seniors. Transportation systems relate directly with the built environment and how our communities are planned. It can be difficult for people on low incomes who must choose lower housing costs at the expense of transportation options.

In addition to public transit, walking and cycling infrastructure and programs support population health and are of particular benefit to the disadvantaged since they are free and promote social integration.

RECOMMENDATIONS:

- Expand the coverage of the BC Bus Pass for those on disability assistance so that it covers the cost of HandyDART
- Work with BC Transit and TransLink to come up with a fare policy and structure to make transit more affordable for those with very low incomes.
- Expand The Get on Board free transit program to youth under the age of nineteen.
- Support the BC Road Safety Strategy Vision Zero: work with partners to create safer streets and to eliminate fatalities and serious injuries on the roads of BC. Prioritize safety measures for vulnerable road users such as pedestrians, cyclists and those in wheelchairs and mobility devices.
- Invest in public transportation systems that serve small, rural, remote and isolated communities such as the use of school buses and bus services that feed into regional centres.
- Increase investment in the Provincial Active Transportation Strategy to support the development of local cycling and walking infrastructure within a larger provincial network. Prioritize the completion of connected cycling and walking transportation networks.

INDIGENOUS PEOPLES

It is well known that the legacy of colonization and continuing systemic racism in Canada has created the current situation in which Indigenous people experience poverty at far higher rates than non-Indigenous people. We believe that a commitment to

reconciliation requires respect and support for Indigenous self-determination. As such, we strongly encourage government to respond to the recommendations put forward by the First Nations Leadership Council in 'Income Supports and Indigenous People in B.C.: An Analysis of Gaps of Barriers'. This will require ongoing work with Indigenous governments on a government-to-government basis as well as Indigenous organizations, leaders and communities to redress the legacy of colonization, unravel toxic systemic racism and bridge the disparities between Indigenous and Non-Indigenous peoples.

CONCLUSION

Moving ahead, it will be essential to implement a range of universal policies but also to work together with key communities to develop targeted programming. Targeted initiatives should be developed and delivered in partnership with representatives from groups that are at a higher risk to be affected by poverty, including Indigenous peoples, Newcomers, racialized communities, single parents, people with disabilities, seniors and those with mental health issues and addictions, among others.

SUBMITTED BY THE BC ALLIANCE FOR HEALTHY LIVING ^x

For further information, please contact:

Rita Koutsodimos,
Executive Director, BC Alliance for Healthy Living
Telephone: 604-989-4546
rkoutsodimos@bchealthyliving.ca
www.bchealthyliving.ca

Established in 2003, Our Vision is “Healthy living for all British Columbians through every stage of life” and our Mission is: “To promote healthy living to prevent chronic disease by mobilizing leading health organizations to collaborate on health policy and programs throughout British Columbia.”

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^x NOTE: While the Union of BC Municipalities (UBCM) is a member of BC Alliance for Healthy Living, UBCM can only support policy positions that their members have endorsed at their annual convention. UBCM has passed a number of resolutions related to reducing poverty (847-2016, B44-2015) and increasing income assistance (2017-B53, 2016-B120, 2015-B45); however, UBCM members do not have a formal position on all of the specific recommendations outlined above and therefore cannot endorse this submission.

Submission from BC Complex Kids Society

Re: BC's Poverty Reduction Strategy

June 2023

BC Complex Kids Society is a grassroots family led society that advocates for equitable support for children with health complexities in BC.

Children with health complexities make up less than 1% of the population and are defined as having complex chronic health conditions, functional limitations, high health care use and high caregiving support needs. It is also important to note that many children in this population are medically fragile and have life limiting or palliative conditions.

Our families experience increased costs associated with all aspects of our children's lives while also experiencing barriers to employment. This leaves our families financially marginalized, especially those who are solo parenting and/ or when the child's care needs are very high. When need flexible and robust policies that recognize a spectrum of family situations and create equitable opportunities for everyone to thrive. We need to recognize the ripple effect of eroded and ableist policies that do not reflect modern times.

Care Supports

Our children and families experience huge gaps in care support and most often, one parent needs to take on a full-time caregiving role, leaving them unable to join the workforce or only able to work minimally.

The Supported Child Development Program is an MCFD program of support that is meant to provide funding for child care for Children & Youth with Support Needs but this program is severely underfunded and inequitably delivered across the province. It is not providing the flexible, family centred support that is needed for families to thrive financially.

With a shift from scarcity to an on-demand style funding model, this could be a life changing program for families and children. We need access to funding for early learning & child care (0-6) and before & after school care (6-19) that meets our full-time care needs so we can join the workforce. This funding needs to be very flexible to account for this population of children who at times, may best be cared for in their own home. We need the option to hire support workers directly or through agency models. We need support that is continuous through school holiday breaks including summer.

Respite is a different type of care support that some of our families receive in some amount but policy states that it cannot be used to support families while they are at work. This is the same policy for Nursing Support Services direct respite which provides nursing support for children that meet certain health criteria.

None of these programs are robust and they are all failing our need for care supports that allow us to join the workforce.

Income Supports

As mentioned above, many of us are full-time unpaid caregivers who spend our days caring for our children with very little opportunity to earn an income.

Even if our children attend school, we only get a small break of about five hours, which is consumed by coordinating specialist and therapy appointments, ordering medications/medical supplies/medical equipment, planning medical travel, keeping up with paperwork etc.

For many of us sleep deprivation is also a very real and ongoing issue, and is exacerbated for families who need an awake person to keep eyes on their child due to respiratory concerns and whom Nursing Support Services is not fulfilling night shifts. We also face periods of time when we need to travel for days or weeks at a time to BC Children's Hospital or when a child is admitted to hospital or recovering at home from a surgery. It is an all-consuming job.

The only income support our families possibly receive is \$248.75 per month (for the lowest income earners in the country) from the [federal Child Disability Benefit](#).

We know that our care work would be financially recognized if we were foster care providers to our children. [In BC, foster parents receive \\$2,347.67 per month specifically for children who meet the Level 3 criteria which is the highest tier of care needs and encompasses children with health complexities](#). This amount is on top of the base amount for all children and specifically recognizes the extraordinary care needs of our children.

[In Quebec there is an income support program for children with exceptional care needs](#), that would provide our families with \$1320 per month, in recognition of this care work.

It is [widely recognized](#), that families with disabled children face financial instability and poverty as a direct result of their child's needs. But this issue has never been addressed and now families are crumbling under the strain of high housing costs and inflation in general.

We would be supported by the introduction of a caregiver benefit that is similar to reflective of the support amount paid to foster caregivers or by a [US style paid family caregiver program](#).

Accessible Vehicles & Homes

One defining characteristic of having health complexities is that our children have functional limitations and very often use mobility devices such as walkers and wheelchairs. The program of support for children with health complexities in BC is under MCFD-CYSN and is called the At Home Program. This program does not support accessible vehicles and only minimally supports home accessibility by providing a ceiling lift and track.

In BC, there was a program called Giving in Action that existed between approximately 2006-2014, that had a goal of “enabling families to stay together by addressing accessibility issues in their homes and communities.” We understand this program was collapsed due to popular demand and families have been left to struggle ever since. We understand there were also equity issues with the program but with some effort, these could be solved. This program supported both home & vehicle modifications which are both essential areas of support that no longer exist in BC.

Here is an excerpt of interest from the Executive Summary of the research done by the Centre for Inclusion & Citizenship that can be found [here](#).

“Thus the GIA investment of just over 42 million dollars renders direct costs avoided of between 50.6 and 68.4 million dollars. Given the other demonstrable benefits (well-being and quality of life), and the downstream savings that accrue from these intangible values, it is clear that the GIA programs were, and are, a sound investment in simple fiscal terms. Further, we note that in the absence of the GIA, there will be a generally negative impact on the sector and a disproportionately negative impact on low and middle income families, and families in rural BC.”

The only known option for home adaptations in BC is the Rebates for Accessible Home Adaptations program which is very restrictive, specifically with regards to the Home Value Limits criteria which screens out many families. The Home Value Limits are not indicative of one’s wealth or income but rather indicative of inflated home prices. Families who have children with health complexities too often find themselves struggling to be employed, struggling to pay mortgages, and struggling to keep their homes. Recognizing the need for a family to adapt their home for a child should not be judged against income, assets and Home Value Limits. Families are setting up for a lifetime of caregiving and desperately need support that keeps everyone safe, healthy and together as a family. Adaptations are essential for everyone’s safety including parents, their disabled children, nurses and other caregivers that work in the home.

It is also important to note that foster families in BC do have immediate and fulsome financial support for home and vehicle adaptations when they are caring for a child with health complexities. It doesn’t make sense not to support biological families in the same way to ensure they can maintain a healthy family life and keep their children in the family home.

Again, we look to Quebec as a jurisdiction that is providing support for both [home adaptations](#) and [vehicle modifications](#) which are robust and not subject to income/ asset testing or Home Value Limits.

Summary

As noted, our recommendations are essential elements in keeping families healthy and together in the family home. BC has committed to supporting families in a way that lowers the number of children that enter government care agreements but we have yet to see any tangible support in this area of need.

We understand that costs can range anywhere from \$75,000 to \$750,000 a year for a child with health complexities to be cared for in government care (foster care or more likely, expensive residential care) if you account for all aspects of the child's support needs.

The social costs are incalculable.

Families are working so hard to support their children and we need the province to step up and do more to safeguard our financial, physical and emotional capacity to thrive.

Recommendations

1. **Expand the Supported Child Development Program and Aboriginal Supported Child Development Programs to include on-demand style flexible funding** that can support children in community child care programs and in-home child care options from the ages of 0-19.
2. **Address the faltering system of Nursing Support Services and ensure that children who need this type of support are getting the support they qualify for and require.** Parents need fulsome respite as well as adequate support so they can join the workforce. Reinstate delegated NSS support in child care settings and in community.
3. **Create a \$2200 per month Caregiver Benefit that recognizes the unpaid care work of parents of medically complex kids.** Our financial health is critical to our children, and their siblings. The better supported we are, the better able we are to take care of our children now and into the future.
4. **Create a robust funding system for Accessible Vehicles & Homes.** Adapting our homes and vehicles is financially unattainable for many of us due to cost pressures. This would be an investment in our health and well-being and the research shows there is long term value to initiatives in this area.
5. **Create a higher threshold of support through the Rental Assistance Program for people with accessibility needs.** Renting can be a challenge and the need to find an accessible, one level home can result in competition and subsequent rental costs that can beyond reach.
6. **Mandate all new multi-unit residential housing to be [universally designed](#)** to ensure there is greater access to accessible housing in the rental market.

We appreciate your consideration of our recommendations and would welcome any opportunity for discussion.

Brenda Lenahan (co director) 250.344.1206

bccomplexkids@gmail.com



Toward a poverty-free BC:

BC Poverty Reduction Coalition submission to the BC Government review of the TogetherBC poverty reduction plan

1. Introduction

This submission advocates for an approach that includes increased financial and social supports for people experiencing poverty and measures to reduce the cost of living for all who call BC home. It focuses on seven “big mover” policy priorities that would profoundly change BC’s social fabric and well-being by largely eliminating deep poverty within five to seven years.

- Raise social and disability assistance rates to the poverty line
- Transform the province’s income support system, drawing on the BC Basic Income Panel’s recommendations
- Address discrimination and stigma by adding social condition as protected grounds to the BC Human Rights Code
- Accelerate a massive expansion of affordable non-market housing
- Prioritize targeted Indigenous Poverty Reduction Measures (in line with DRIPA and the TRC Calls to Action)
- Make public transit fare-free and creating a publicly-owned intercity or inter-regional bus service, and
- Close the gap between the living wage and the minimum wage

By no means should these be the only policies considered; we do not map every key poverty reduction lever in this submission, but note, in particular, the excellent work done by the BC Basic Income Panel, along with the many essential recommendations brought forward by PRC member organizations, lived experience experts, and others. Poverty is not inevitable - it is a policy choice, not an individual choice; a poverty-free BC is possible.

1.1 BC PRC role and approach

The BC Poverty Reduction Coalition (PRC) comprises over 80 organizations, stakeholders, and people with lived experience of poverty collectively advocating for an end to poverty, homelessness and inequality in British Columbia through public policy and law reform.

The PRC understands poverty as a direct result of economic inequality and policy choices that violate economic and social rights, not an inevitable or naturally occurring phenomenon. Eradicating poverty is

not an impossible or utopian dream but a reality requiring upstream, intersectional, systemic solutions. Nobody should live below the poverty line in a province as wealthy as BC. Poverty causes suffering, impacts the mental and physical health of families and communities, contributes to family violence, and continues to be a profoundly stigmatizing and disempowering experience for many people who call BC home.

The PRC was founded to advocate for a provincial poverty reduction plan. In 2019, the PRC's advocacy contributed to the TogetherBC Poverty Reduction Strategy (TogetherBC or the 'Strategy'). The PRC has since developed a broad, comprehensive policy platform called the [Blueprint for Justice](#), which outlines our overall policy vision and recommendations for the BC government to expand its initial progress. The Blueprint is based on four principles: [economic security](#), [universal basic services](#), [equity](#), and [climate justice](#), with each section containing specific policy recommendations. In addition to this submission, we urge the government to draw on the Blueprint, created by policy experts with direct input from people with lived and living expertise who can best articulate the injustices they face and how to transform them.

1.2 TogetherBC and the Need for a transformative agenda

The introduction of the TogetherBC Poverty Reduction Strategy in 2019 marked a significant policy shift in BC. Overall, the Strategy was well-designed, taking a comprehensive, cross-government approach and setting targets with timelines for reducing overall poverty rates in the province. The Strategy was accompanied by a suite of welcome policy changes – notably, the BC Child Opportunity Benefit (now called the BC Family Benefit), scheduled increases to the minimum wage, significant investments in child care, some new investments in affordable housing, and several long-overdue changes to the rules for accessing social and disability assistance.¹

Together BC was a significant first step; however, the strategy's overall targets were insufficiently ambitious and notably failed to include a target for reducing the depth of poverty or a substantial increase in BC's abysmally low social and disability assistance benefits. While the strategy signalled a substantial shift in provincial appetite for action and contributed to some reductions in the official poverty statistics,² deep poverty remains entrenched.

Since then, the province has brought in several further positive measures, including the most robust suite of temporary pandemic-related supports of any province in Canada.³ Poverty rates declined substantially in 2020 across Canada thanks to pandemic income supports, primarily the federal CERB program (and subsequently the CRB). BC saw the second-largest drop in poverty thanks to its relatively strong pandemic measures.⁴ BC Budget 2023 also announced substantial new affordable housing

¹ Our submission uses the terms "social assistance" and "disability assistance" to refer to what is often also called "welfare". We avoid the term welfare due to the stigma it often carries. We use "income supports" to refer to the wider suite of programs that social and disability assistance are part of, and that also includes programs like the BC Child Opportunity Benefit and other targeted benefits provided by the federal and provincial governments.

² Although it is too soon to assess the impact of the BC Child Opportunity Benefit given families began receiving it in 2020 and the lag in data on poverty rates.

³ [Still Picking up the Tab | Canadian Centre for Policy Alternatives](#).

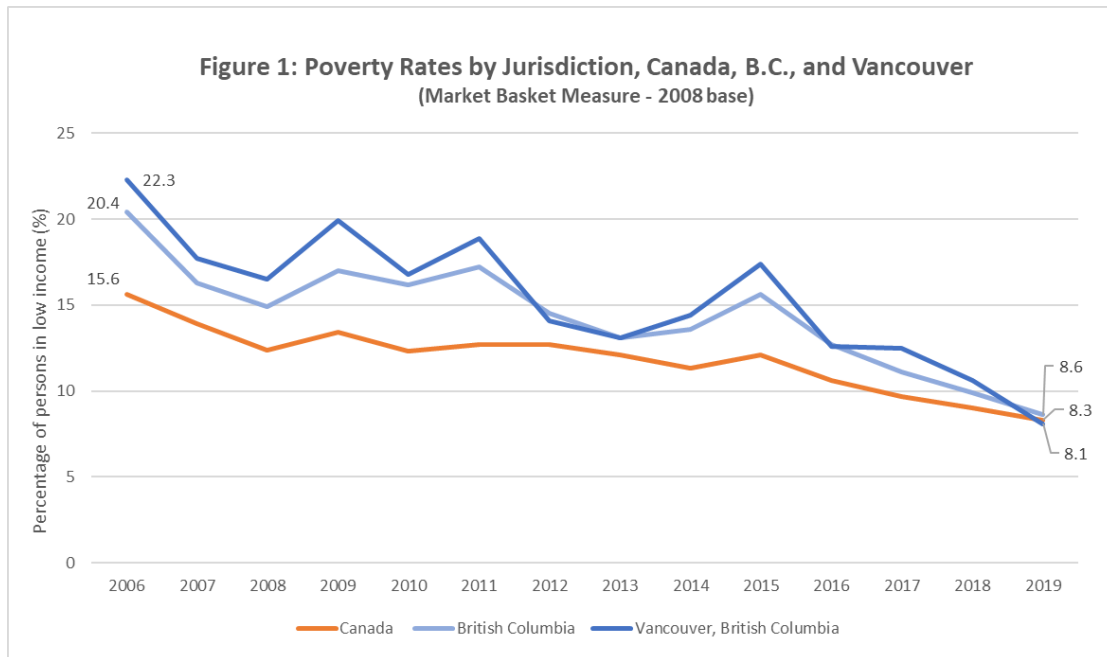
⁴ [An unexpected consequence of the pandemic: Poverty declined sharply in Canada | Canadian Centre for Policy Alternatives](#).

investments, an incremental increase to social assistance shelter rates, and a significant boost to the Climate Action Tax Credit.

Given the temporary nature of pandemic income supports, sky-high rents in many communities around the province, and the rising costs of goods and services due to inflation (especially for groceries), poverty rates risk returning to their pre-pandemic levels or even increasing. The seven big-mover policy recommendations presented in this submission represent transformative action that would accelerate the initial progress that has been made.

1.3 The state of poverty in BC

Historically, BC's poverty rate has been higher than the national rate, and Vancouver had a higher poverty rate than the rest of the province (Figure 1). After 2006, the BC, Vancouver, and Canada poverty rates declined, and the gap between them also slowly narrowed. As discussed in the Final Report of the British Columbia Expert Panel on Basic Income⁵, the convergence of these poverty rates is noteworthy, especially since 2017. The public policies that most likely contributed to this reduction were, federally, the Canada Child Benefit (introduced in 2016) and the increase in the OAS/GIS supplement for low-income seniors (since 2015), along with significant and long overdue increases to the minimum wage.



Source: Statistics Canada. Table 11-10-0135-01. MBM 2008 base.

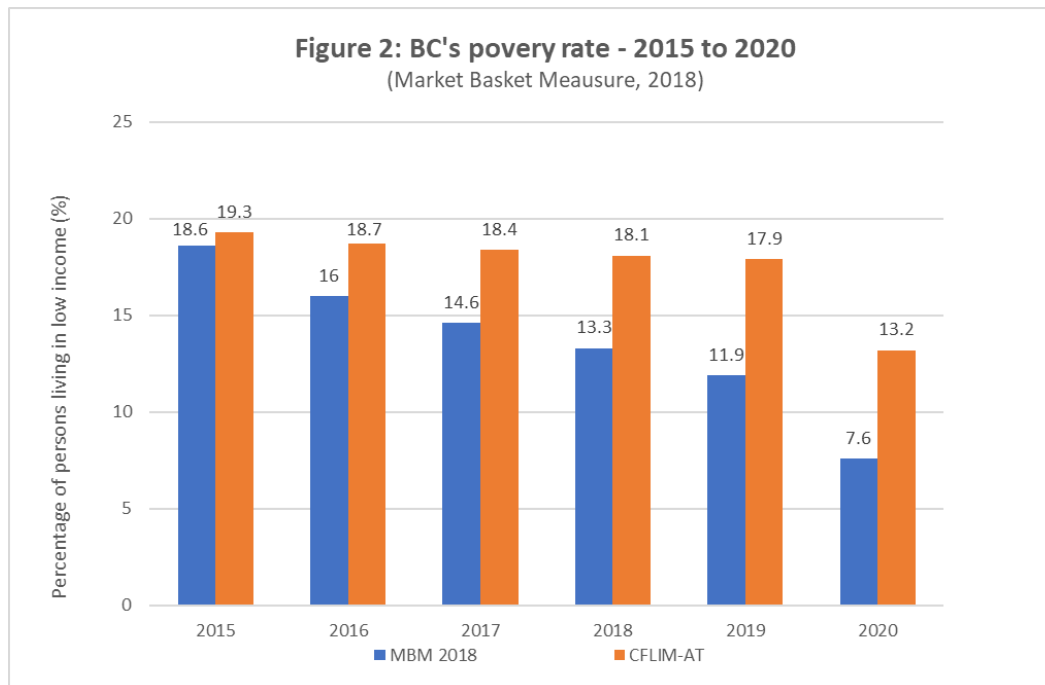
Beginning in 2020, BC's poverty rate declined substantially as federal and provincial action was taken in response to the impact of the COVID-19 pandemic. This included the introduction of CERB and CRB and a variety of short-term provincial supports. Actions taken during the pandemic demonstrate that major

⁵[Covering All the Basics: Reforms for a more just society. Final Report of British Columbia Expert Panel on Basic Income.](#)

progress is quickly achieved when the will is there, a clear reminder that the persistence of poverty in BC is a policy choice, not an inevitability.

However, it is essential to consider that Statistics Canada projects that the national poverty rate will increase to 7% in 2021 (a 9.2% increase over 2020), with a more significant change projected for 2022, to 9.8% (a 41.5% increase).⁶

It is also essential to consider that while the Market Basket Measure (MBM) has been adopted as the official poverty line by the BC and federal governments, this measure has limitations. The MBM is an absolute measure of poverty that uses a basket of goods and services to determine the income a family would need to meet its most basic needs.⁷ However, it excludes many people who live in deep poverty (among other limitations).⁸ It is essential to also look at the Census Family Low-Income Measure, After Tax (CFLIM-AT), which is a relative measure of poverty calculated as 50% of the median (middle) income for a given family size.⁹ As Figure 2 shows, in 2020, 7.6% of persons living in BC were low-income using the MBM, while the CFLIM-AT estimated a poverty rate of 13.2% for that same year.



⁶ Market Basket Measure poverty thresholds and provisional poverty trends for 2021 and 2022 | Statistics Canada. Statistics Canada's projections were made using an estimate of the Consumer Price Index (CPI) increase of 6% in 2022. The CPI ended up being higher – 6.8% – so the increase in the poverty rate is likely underestimated.

⁷ The basket of goods and services is associated with a modest standard of consumption adjusted for family size and geographic region. For example, a family of four living in Vancouver in 2021 would have to spend approximately \$ 2,074 in clothing, \$ 4,733 in transportation, \$ 12,704 in food, \$ 20,272 on shelter, and \$ 12,101 in other expenses. In 2021, a family such as this one that had an annual, disposable income below \$51,884 would be living in poverty. The MBM thresholds are available at [Statistics Canada Table: 11-10-0066-01](#).

⁸ See Campaign 2000's 2022 Child Poverty Report Card for a review of the strengths and limitations of different poverty measures: [Pandemic Lessons: Ending Child and Family Poverty is Possible](#).

⁹ The MBM is based on data from the Canadian Income Survey (CIS) while the Low-Income Measure (After-tax) is based on tax data.

Source Statistics Canada Table 11-10-0135-01, Low-income statistics by age, sex and economic family type, and Table 11-10-0018-01, After-tax low-income status of tax filers and dependants based on Census Family Low Income Measure (CFLIM-AT), by family type and family type composition.

Further, the MBM is typically measured using the Canadian Income Survey. However, the latest Census shows a higher rate of poverty for 2020 than the income survey: 9.8% vs 7.6% in BC.¹⁰ Using the Census data, Nova Scotia and British Columbia had the highest poverty rates among the provinces – 9.8% compared to the national average of 8.1%. Vancouver had the highest poverty rate (11.2%) of all census metropolitan areas in Canada.¹¹

Although the number of people living with low incomes in BC has declined, some people are still being left behind, as pointed out in the final report of the BC Basic Income Panel¹²:

The overall working-age poverty rate is only slightly higher than the child poverty rate for B.C., but when broken down by family type, significant differences are apparent. Specifically, single parents and adults without children are the groups with the highest rates, several times more than couples with or without children. (p.14-15)

Since 2016, the child poverty rate has been decreasing in BC. According to the latest BC Child Poverty Report Card, which uses CFLIM, “in 2020, the child poverty rate in British Columbia was 13.3%. Between 2019 and 2020, the number of BC children (0–17 years old) living in poverty dropped by 40,060.”¹³ However, the probability of living in a poor household increases for racialized children, Indigenous, and/or lone-parent families, especially those led by women. Further, experiencing poverty as a child has lifelong impacts.¹⁴

The 2021 Census data showed that the poverty gap between Indigenous and non-Indigenous people varied little as the poverty rate among Indigenous people declined, mirroring the overall poverty trend in Canada from 2015 to 2020. The poverty rate – measured by the MBM - among the 63,345 Indigenous people enumerated in Vancouver was 13.9% in 2020, 2.8% higher than the non-Indigenous people rate.¹⁵ It is noteworthy that the MBM is currently unavailable for Indigenous people living on reserves, which sets aside the high cost of its intrinsic circumstances, such as remoteness or lack of accessibility. Indigenous people are more likely to experience poverty, with less access to basic services and fewer social and economic opportunities than the rest of the population.

Poverty rates alone do not provide a complete picture, however. They tell us how many people are in poverty but not about the depth of poverty – the gap between the average incomes of people living in poverty and the poverty line itself.

As Figure 3 below shows, in BC, the working-age population experiences the most significant depth of poverty (with an average income 36.6% below the MBM). For children, it was 30.9% and considerably for

¹⁰ [Disaggregated trends in poverty from the 2021 Census of Population | Statistics Canada.](#)

¹¹ [Disaggregated trends in poverty from the 2021 Census of Population | Statistics Canada.](#)

¹² [Covering All the Basics: Reforms for a More Just Society. Final Report of British Columbia Expert Panel on Basic Income.](#)

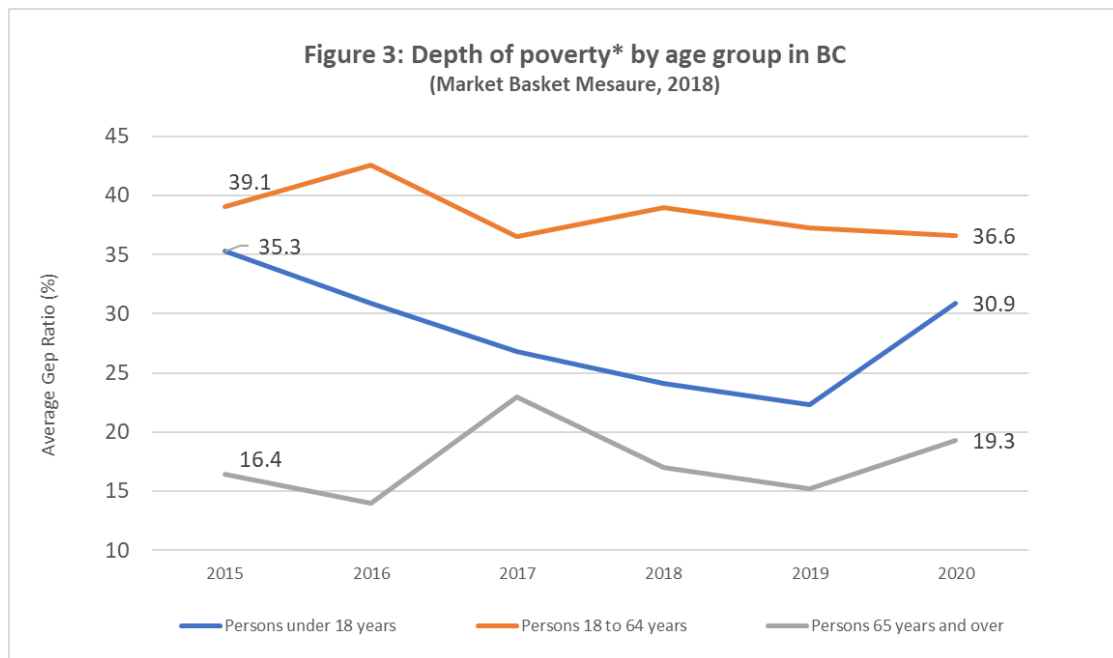
¹³ [2022 BC Child Poverty Report Card |First Call: Child and Youth Advocacy Society.](#)

¹⁴ [Understanding Systems: The 2021 report of the National Advisory Council on Poverty | Canada.ca.](#)

¹⁵ [Disaggregated trends in poverty from the 2021 Census of Population | Statistics Canada.](#)

seniors, 19.3%. BC food banks saw a 78% increase in use by BC seniors over the last five years,¹⁶ indicating that the cost of food and necessities is becoming a crisis point for many experiencing deep poverty. The government must develop a plan to address the rising cost of food beyond funding charitable food responses; there are better courses of action when food insecurity is fundamentally economic insecurity.

People living in deep poverty are most likely to receive social assistance. Figure 4 illustrates the deep poverty imposed on people who rely on social and disability assistance in BC. Even after accounting for federal and provincial tax credits/benefits (including child benefits for families with children), household incomes are far below the poverty line, particularly for single adults.

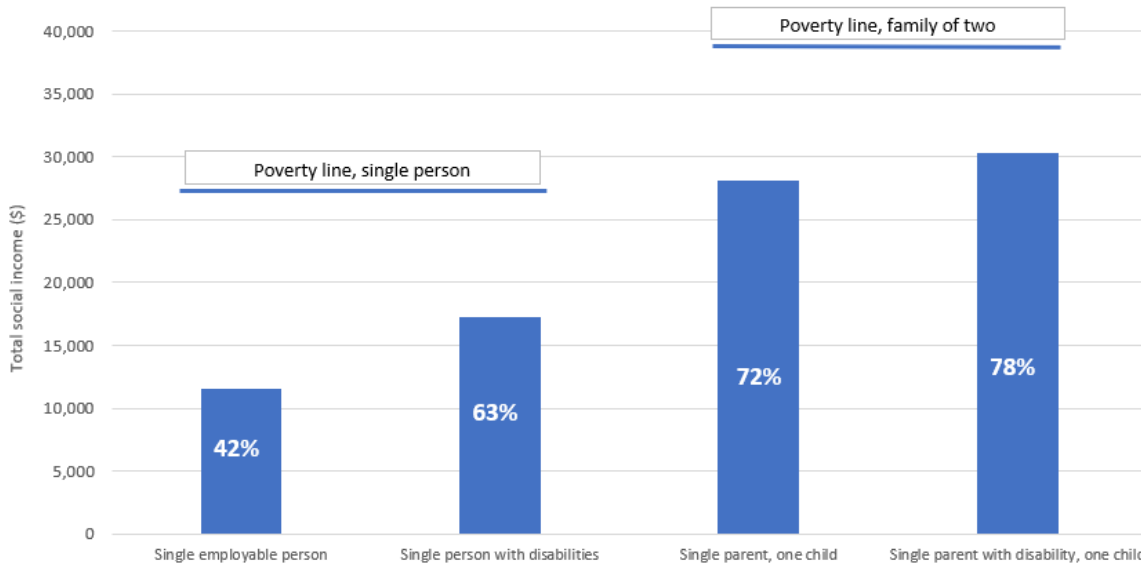


Source: Statistics Canada. Table 11-10-0135-01 Low-income statistics by age, sex and economical family type. *The depth of poverty in Figure 3 is the average gap ratio, the average difference between each poor person's household income and the MBM for their household type. The average gap ratio is a percentage of the MBM income thresholds.

¹⁶ [BC Seniors: Falling Further Behind | Office of the Seniors Advocate BC.](#)

Figure 4: Total social assistance income compared to the poverty line

(2022 social assistance rates and MBM projected poverty line for 2022)



Sources: Social assistance income calculated using 2022 rates does not include increases announced on BC Budget 2023. The 2022 poverty line is the projected one calculated by [Statistics Canada](#). Authors' calculations based on the methodology used in Maytree Welfare in Canada: British Columbia ([Welfare in Canada - British Columbia - Maytree](#)). Annual welfare income includes applicable Canada Child Benefit income, BC Early Childhood Tax benefit, the federal GST credit, the BC low-income carbon tax credit, the BC sales tax credit and annual "Christmas" and back-to-school supplements for the calendar year. [Statistics Canada projected 2022 MBM thresholds](#).

Poverty in BC tells a clear story: the more marginalized your identity, the harder life is, and the harder it becomes to access pathways out of poverty. Poverty impacts people differently, and quality of life is also essential. For people who regularly lose their heating or electricity, cannot afford a cell phone, are fleeing violence, or rely on non-profit food providers for meals, the importance of a dignified life and meeting basic needs cannot be overstated. People in poverty - for example, seniors with disabilities or queer youth exiting care - often face multiple, overlapping forms of marginalization and compounded barriers. Any poverty reduction plan must address these intersectional barriers. Poverty reduction measures need to be equity-centered and created with the meaningful engagement of and accountability to people with lived experiences from various social locations, experiences, and identities.

The PRC Community Action Network (CAN)¹⁷ comprises people with lived and living experiences of poverty. We hear extensively from CAN members: about experiences of anti-Black racism at the food bank, with rental prospects, or in schools; about fears of losing children to the child welfare system as a consequence of being poor; about avoiding critical dental care for years because of cost or skipping meals to make sure kids have school supplies. The discrimination, shame, and systemic barriers they regularly experience create additional burdens as they struggle to care for themselves and their families. These burdens include the "time poverty"¹⁸ associated with lining up for services and other forms of deprivation. Many CAN members describe being poor as a full-time job. They have been made to feel dehumanized or humiliated in accessing services, sometimes withdrawing from them entirely, even if it means fewer resources.

¹⁷ [Community Action Network \(CAN\) | BC Poverty Reduction Coalition](#).

¹⁸ [Time poverty: Obstacle to women's human rights, health and sustainable development | PMC](#).

The 2021 report of the National Advisory Council on Poverty clearly outlines that “having more marginalized identities increases the risk of living in poverty.” Further, the depth of poverty these groups experience is largely unknown, as precise disaggregated data as a result of this marginalization doesn’t exist; there are language barriers to newcomers, a lack of trust in government supports, or other barriers such as anxiety over immigration status, unreliable phone or internet service, inter-generational trauma from residential schools, or even growing up in poverty that may prevent people from sharing their experiences.

2. Seven big-mover policy priorities:

The following policies are titled big movers, given the powerful impact they would quickly have on eliminating poverty in BC, especially for those currently experiencing deep poverty and those with marginalized identities. They focus on incomes and access to services — as access to healthcare, housing, social connections, culture, legal services, and other societal and public resources pose challenges for many who experience poverty.

These big movers should be completed or be significantly underway within the next five-year period of the poverty reduction strategy.

2.1 Raise social and disability assistance rates to the poverty line

Context/rationale: The gap between social and disability assistance rates and the poverty line is wide, despite several modest incremental increases to these benefits in recent years. Many voices have long called on the province to raise social assistance rates substantially.

While some may be concerned that significantly increasing social and disability assistance rates would be a hard sell politically, opinion research shows that most British Columbians favour bringing rates up to the poverty line.¹⁹ The public conversation about income support fundamentally changed during the pandemic, with CERB having provided Canadian society with the experience, in essence, of a temporary basic income program. CERB provided temporary income support of \$2,000/month, just shy of the MBM (Vancouver) poverty line threshold for a single person.

There is no way around the reality that social and disability assistance rates are abysmally low and have the effect of legislating deep poverty. By comparison to the CERB benefit of \$2,000 per month, the current maximum social assistance rate for a single person is \$1,060 (including the recently announced increase to the shelter amount).

As the Canadian Centre for Policy Alternatives has pointed out, “While the majority of the poor are not on social assistance, most of those in deep poverty are... deep poverty in our province is mainly a story of inadequate welfare rates.”²⁰

TogetherBC’s focus on breadth targets means it has not addressed the depth of poverty many marginalized and equity-deserving groups are experiencing and the entirely preventable human suffering that results. As noted in the National Advisory Council on Poverty’s 2021 report, Black Canadians, racialized Canadians, newcomers immigrants, refugees, Indigenous people, persons with disabilities, and 2SLGBTQ individuals all

¹⁹ [British Columbians approve of the province’s COVID-19 response & want a more equitable, sustainable economy post recovery—regardless of party affiliation | Policy Note.](#)

²⁰ [Deep Poverty: BC Government Can—and Should—End It | Policy Note.](#)

face higher rates of poverty²¹ – low social assistance rates compound the marginalization of these groups and directly contribute to a variety of other challenges including homelessness, poor mental and physical health, unsafe conditions for sex work, food insecurity, and others.

We also note that many people experiencing deep poverty in BC have difficulty accessing assistance or simply are not eligible —unhoused people, sex workers, people who are “undocumented” or have precarious immigration status, and those in grey economies like vending.

Actions needed:

- Increase social assistance and disability assistance actual rates to the poverty line (Market Basket Measure) as a centrepiece of the 2024 BC Budget and index rates to changes in the poverty line.
- Combine the shelter and support allowance components of social and disability assistance payments.
- Substantially increase earnings exemptions for those receiving social and disability assistance and end the clawback of unearned income.

Some argue that raising rates will draw people out of the labour market. However, the evidence suggests any such impacts would be small.²² Alongside expanded earnings exemptions and further increases to the minimum wage, such effects would likely disappear altogether.

2.2 Transform the province’s income support system, drawing on the BC Basic Income Panel’s recommendations.

Context/rationale: Social assistance is part of a larger income support “system” in BC but is fragmented and needs transformation. In 2018, the provincial government appointed an expert panel to investigate the feasibility of a basic income as a potential tool for poverty reduction in BC. Following rigorous and extensive research, in December 2020, the panel issued a comprehensive report with detailed recommendations for creating a more cohesive income support system that includes basic services and targeted cash transfers.

Actions needed: Draw on the BC Basic Income Panel report recommendations, which provide a roadmap for a cohesive provincial income security system.

- The BC Basic Income Panel report is extensive and includes 65 recommendations, including reforming social assistance (Temporary Assistance) to reduce the “welfare wall”; providing extended health benefits for low-income people in BC; enhancing support for low-income families with children; increasing housing for people fleeing violence; mandate a ministry to support former youth in care; and others.
- In addition, we call for an end to the [spousal cap](#) restrictions on social assistance, which force disabled individuals to be financially reliant on romantic or intimate partners.
- Implement the Red Women Rising report recommendation for residential school survivors to have a guaranteed livable income and housing for the rest of their lives.²³

2.3 Address discrimination and stigma by adding social condition to the BC Human Rights Code.

²¹ [Understanding Systems: The 2021 report of the National Advisory Council on Poverty | Canada.ca.](#)

²² [Final Report of British Columbia Expert Panel on Basic Income.](#)

²³ [Red Women Rising: Indigenous women survivors in Vancouver’s Downtown Eastside | Downtown Eastside Women’s Centre.](#)

Context/rationale: Living in poverty is not a choice that individuals make for themselves – legislative and policy failures create and sustain poverty. People living in poverty and sheltering in public spaces, people who use drugs, people with low incomes, sex workers, and others from marginalized communities experience discrimination based on social conditions, trapping them in cycles of criminalization and further impoverishment. According to the BC Office of the Human Rights Commissioner (BCOHR), “while many of those discriminated against based on social condition also have other intersecting characteristics, such as race or disability, protected by the B.C. Human Rights Code, many people face social or economic disadvantage who cannot avail themselves of these protections”.²⁴ This addition would support a human rights approach to reducing the stigmatization and criminalization of poverty.

We hear from people with lived experience of poverty that employers, landlords, housing providers, and others continue to discriminate against people based on factors like their postal code, income, drug use, sex work etc. The addition of social condition to the human rights code would create better legal rights and conditions for people experiencing intersectional poverty across BC.

Actions needed:

- Work with the BC Office of the Human Rights Commissioner, PIVOT Legal Society, and other groups to add “Social Condition” to the B.C Human Rights Code as a prohibited ground for discrimination.
- Require public institutions and services to audit their policies and practices to match an updated provincial Human Rights Code that includes social condition, including bringing municipal by-laws and hearings processes into compliance.²⁵

2.4 Accelerate a massive expansion of affordable non-market housing

Context/rationale: The housing crisis deprives many British Columbians of the right to secure affordable housing, with people in poverty among those most severely impacted. According to Statistics Canada data, BC has the dubious honour of “leading the country as the province with the highest rate of unaffordable homes.”²⁶ The lack of a supply of new, actually affordable rental housing amid an ultra-low vacancy is increasing the pressure on renters.

The BC NDP’s 2017 election promise was to build 114,000 affordable rental, non-profit, co-op and owner-purchase housing units over ten years – a very positive commitment. However, the government is significantly behind. An update on this promise by the Canadian Centre for Policy Alternatives, using numbers from the 2022 BC Budget briefing notes for the Minister of Housing, showed that just over 12% of the 114,000 targets were completed as of March 31, 2022. Of the 13,901 completed, the majority (4,229 of the total completed) are units aimed at the most vulnerable and homeless. Another 8,418 units are supported through loan programs, with the bulk of these (6,077 units) for student housing. However, 80% of the target remains without commitment, and we are now over halfway through the 10-year timeline.²⁷

²⁴ [Adding ‘Social Condition’ as a Protected Ground to B.C.’s Human Rights Code | British Columbia’s Office of the Human Rights Commissioner.](#)

²⁵ [The Case for Social Condition | Pivot Legal Society.](#)

²⁶ [B.C. is the most unaffordable province for housing in Canada, census data shows | CBC News.](#)

²⁷ [Still so far from home: An update on BC’s 114,000 homes promise | Policy Note.](#)

One strategy that could accelerate and provide a foundation for a much larger expansion is a self-financing model in which public and non-profit housing projects cover their upfront costs with ongoing rental income: “The model is based on the idea that the government can borrow at cheaper interest rates than the private sector and can amortize those costs over a longer period (50 or more years, if desired), both of which can further reduce break-even rents.”²⁸

Failing to provide adequate, affordable housing and not addressing poverty's underlying causes — including colonialism, racism, and displacement — aggravates homelessness. The 2020/21 Report on Homeless Counts in B.C. identified 8,665 individuals experiencing homelessness (assessed by 16 homeless counts conducted in March 2020 and April/May 2021). It notes, “When comparing communities that completed a count for both the 2018 report and 2020/21 report, there is an 11.5% increase in the number of individuals experiencing homelessness. Of all survey respondents, 39% identified as Indigenous. Almost two-thirds (62%) of survey respondents indicated they had been without a place of their own for one year or more, and the most common answer from respondents regarding the reason for housing loss was not enough income (30%).”²⁹

Gender-based violence is also profoundly linked to housing; staggering numbers of women return to violent partners because of a lack of affordable housing. More transition homes for women, girls, and gender non-conforming people are badly needed.³⁰

Lived experience experts also offer analysis that having to prove your income to access housing creates barriers and can force people to disclose private information that could put them at risk of criminalization. Ensuring housing is truly affordable relative to people’s real incomes is essential.

Actions needed:

- [We echo the CCPA-BC’s call for a province-wide plan to build new dedicated, non-market affordable housing that aims for a quarter million units over the next decade or 25,000 new non-market units per year.](#)³¹
- Implement vacancy control across BC. Low vacancy rates are a crucial predictor of homelessness in the US³², and we know when there is a housing shortage, people get squeezed down the housing spectrum and into homelessness.
- Increase the province-wide stock of all forms of social housing, including accessible units, and ensure the right to housing for marginalized groups, in particular, Indigenous people, women, and children experiencing or fleeing relationship violence, disabled people, youth leaving care, children, low-wage workers, single parents, trans and gender non-conforming people, and others who experience deeper poverty in BC.
- Ensure SROs have acceptable standards of housing, which must include the right to heating and cooling as mitigation tools for extreme weather and adequacy as outlined in the Rights To

²⁸ [Financing public housing: How a massive expansion of rental homes can literally pay for itself | Policy Note.](#)

²⁹ [2020/21 Report on homeless counts in B.C. | Homelessness Services Association of BC.](#)

³⁰ [BC Housing’s COVID-19 Response: - Additional Safe Spaces for Women and Children Leaving Violence | Office of the Auditor General of British Columbia.](#)

³¹ [Still so far from home: An update on BC’s 114,000 homes promise | Policy Note.](#)

³² [Homelessness Is a Housing Problem | Sightline Institute.](#)

Housing³³ human rights framework. Adequacy means addressing long-term issues such as black mold, rodents, pests, broken elevators, and other erosions to the quality of SROs, shelters, and social housing.

- Deploy no-cost income-qualified retrofit programs at scale to ensure all British Columbians can benefit from energy-efficient and climate-resilient homes.
- Enable energy security for all, addressing affordable access to essential energy services like heating, lighting, and cooking.³⁴
- Design systems to address the immediate impacts of homelessness by employing a person-centred approach that considers the intersectionality of the barriers experienced by each individual while safeguarding their inherent dignity and personal autonomy.

2.5 Prioritize targeted Indigenous Poverty Reduction Measures

Context/rationale: In BC, as elsewhere in Canada, poverty rates are much higher for Indigenous people, including Indigenous children. According to the 2022 BC Child Poverty Report, “The overall child poverty rate on 59 BC First Nations reserves in 2020 was 29.2%, more than twice as high as the overall child poverty rate, with at least 3,900 children living in poverty. And the child poverty rate on rural reserves was 33.9%, much higher than the 25.2% rate on urban reserves.”³⁵ Poverty perpetuates the 2SMMIWG (Missing and Murdered Indigenous Women, Two-spirit Peoples, and Girls) crisis.

The BC Basic Income Panel commissioned a report, “Income Supports and Indigenous People’s in BC: An Analysis of Gaps and Barriers,” which states that “the lack of available or appropriate data, noted throughout this report, demonstrates a clear gap in how poverty and well-being are measured and reported on, for and by Indigenous people in Canada and BC.”³⁶ The report identified barriers to income supports and services that Indigenous peoples face, including while transitioning from on- to off-reserve supports. The report also outlines clear recommendations to address these disparities. These include removing obstacles for Indigenous Persons with Disabilities, addressing systemic colonial racism in governmental services, strengthening local Indigenous food systems, and affordable housing options, increasing Indigenous-specific harm reduction and treatment supports, and more.

Indigenous-specific poverty reduction measures need to be prioritized and self-determined by Indigenous nations and organizations to be consistent with the Declaration on the Rights of Indigenous Peoples Act.³⁷ Given historical and ongoing colonization in Canada, and the atrocious violence, dispossession, and harm committed against Indigenous Peoples, a targeted Indigenous-led approach is required. Such an approach must address the depth of poverty that many individuals, families, and Nations continue to experience as a direct result of genocide, the dispossession of land, the Indian Act, residential schools, and child apprehension/removal.³⁸ The historical context is critical to “understanding the mechanisms by which

³³ [Right to Housing Legislation in Canada | The National Right to Housing Network](#).

³⁴ [Household energy affordability in BC: Submission to the Energy Affordability Working Group](#).

³⁵ [2022 BC child poverty report card | First Call](#).

³⁶ [Income supports and Indigenous Peoples in B.C.: An analysis of gaps and barriers](#).

³⁷ [Declaration on the rights of Indigenous Peoples Act | Province of British Columbia](#).

³⁸ [Understanding systems: The 2021 report of the National advisory council on poverty | Canada.ca](#)

colonization, genocide, land dispossession, and forced assimilation policies translate into the conditions of poverty that the Indigenous people experience today in B.C.³⁹

Actions needed:

- We support the BC Association of Aboriginal Friendship Centres calls on BC to “commit to developing an Indigenous specific poverty reduction plan, within a decolonizing anti-racist lens, complete with specific goals, targets, timelines and accountabilities”⁴⁰.
- The Native Women's Association of Canada has put forward a suite of recommendations, including “investing in Indigenous-specific services that are culturally relevant in social service areas such as reintegration and bridging programs for incarcerated Indigenous women, addiction and detox centres, housing and shelter supports, child care, and employment centres.”⁴¹ Indigenous-specific programs, run by and for Indigenous peoples and communities, must be part of reconciliation in the context of poverty reduction in BC.
- Implement the Red Women Rising recommendation to implement human rights, Indigenous rights, and gender-based analysis in the conception and implementation of all poverty reduction strategies, policies, legislation, and decision-making.⁴²
- Implement calls to action within provincial jurisdiction from the Truth and Reconciliation Commission and the National Inquiry into Murdered and Missing Indigenous Women and Girls, and implement recommendations from the Income Supports and Indigenous Peoples in BC report.

2.6 Make public transit fare-free and create a publicly-owned intercity and inter-regional bus service

Context/rationale: In 2021, the BC government made public transit free for children and youth under 12. This commendable decision should be extended to make public transit fare-free to all riders. A reliable, affordable, and dignified service intersects broad issues like climate, poverty, and disability: saving money, taking cars off of streets, speeding up climate action, and creating a barrier-free transportation option for all community members. Eliminating fares would reduce the criminalization of poverty – and money spent on policing fare evasion could be redirected to increasing service capacity for more riders and service routes.

Multiple cancellations, cutbacks, and privatizations, especially of bus services, have created a crisis in transportation in Northern BC.⁴³ The Red Women Rising Report calls for “free public bus transportation between each town and city located along the entire length of Highway 16 and all other highways, with safe homes and emergency phone booths along the length of all the highways”⁴⁴ as a key strategy to mitigate the

³⁹ [Income Supports and Indigenous Peoples in BC: An Analysis of Gaps and Barriers.](#)

⁴⁰ [Indigenous poverty reduction consultations: A summary report | The BC Association of Aboriginal Friendship Centres.](#)

⁴¹ [Poverty reduction strategy: The Native Women's Association of Canada engagement results | Native Women's Association of Canada.](#)

⁴² [Red Women Rising: Indigenous women survivors in Vancouver's Downtown Eastside | Downtown Eastside Women's Centre.](#)

⁴³ [BC needs a public intercity transportation service | Policy Note.](#)

⁴⁴ [Red Women Rising: Indigenous women survivors in Vancouver's Downtown Eastside | Downtown Eastside Women's Centre.](#)

MMIWG2S crisis that has particularly culminated on Highway 16, or “Highway of Tears.” The Native Women’s Association of Canada also indicates that “affordable transportation is essential in accessing culture,” one of the major strategies they identify as key in Indigenous-specific poverty reduction.⁴⁵

Action needed:

- Eliminate fares for all public transit riders in BC, starting with children and people in poverty.
- Roll back privatization and put the public back in public transit, including making BC ferries fare-free or sliding scale for travel.
- Invest in increased infrastructure and service, including improving service and safety by establishing 24/7 bus routes.
- Expand and improve an inter-city and inter-regional bus service.
- Add safe homes and emergency phone booths, and improve cell phone connection along all the highways connecting Northern BC to mitigate the MMIWG2S crisis.
- Improve transit infrastructure, including expanded HandyDART infrastructure and accessible transportation options, which should also be fare-free.
- Consider special accommodations for fly-in, northern, and remote communities.⁴⁶

2.7 Close the gap between living wage and minimum wage

Context/rationale: The provincial government’s decision to increase the minimum wage in 2022 in line with inflation (over the prior calendar year) was positive and should continue. However, there is no rationale for how the minimum wage is set in the first place, and the disparity between the minimum and living wages is substantial. The living wage is calculated based on a family’s basic needs for housing, child care, food, transportation and other minimum living costs in a specific community. It considers the offsetting impact of government income supports and public services like child care that concretely reduce out-of-pocket costs. If implemented, other policy recommendations in this submission would offset future increases in the living wage by reducing the cost of living (ex., fare-free transit, increasing the supply of affordable rental housing).

Actions needed:

- Close the gap between BC’s current minimum wage rate of \$15.65, the Metro Vancouver living wage rate of \$24.08, and Victoria’s Living Wage rate of \$24.29 an hour by 2026 with regular annual increases to reflect changes in the cost of living.⁴⁷
- In the meantime, commit to the BC government becoming a living wage employer to tackle low wages in the public sector and contracted partners and to set a leading example.
- Create more employment opportunities for Peer Work for people who cannot engage in traditional forms of employment. Ensure the minimum wage and other employment standards

⁴⁵[Poverty reduction strategy: The Native Women's Association of Canada engagement results | Native Women's Association of Canada.](#)

⁴⁶[Reclaiming power and place: The final report of the National Inquiry into the missing and murdered Indigenous women and girls.](#)

⁴⁷ While living wage rates are currently calculated based on the cost of living in specific communities, a uniform minimum wage is required provincially. We recommend adopting the Metro Vancouver rate as the provincial minimum standard for all workers.

applies to farm workers, Peer Workers and others who may be excluded, including those in the gig economy.

4. Conclusion

Poverty rates continue to be unacceptably high in BC, especially for those pushed into deep poverty. Eradicating poverty requires ambitious, systemic, and intersectional policy solutions. This brief sets out seven high-priority areas with key recommendations from our stakeholders, policy experts, and folks with living experiences of the impacts of poverty. These recommendations would reduce human suffering and stigma and create safer, healthier communities by largely eliminating poverty within 5-7 years. They would also profoundly impact deep poverty in BC and increase the quality of life materially for many made most marginal and who need urgent help.

Implementing these seven big-mover priorities would also help alleviate BC's other pressing crises, including those related to the toxic drug supply, housing affordability, and climate change, and by increasing social inclusion and public safety. A poverty-free BC is possible, realistic, and within our collective power to achieve within this time frame with strong leadership.

Thank you very much for the opportunity to submit for the Poverty Reduction Strategy's first review - and we look forward to seeing what next steps are taken to achieve BC's poverty reduction and eradication goals.

Many thanks to the policy experts, lived experience experts, volunteers, board of directors, and coalition members who provided input, expertise, and guidance in this submission.

This policy brief was prepared by Rowan Burdge, Tania Oliveira and Shannon Daub. Special thanks to Tania Oliveira for her research and writing support.

The BC Poverty Reduction Coalition office is on traditional, ancestral and unceded xʷməθkʷiyəm (Musqueam), Skwxwú7mesh (Squamish), and səliwətaʔ (Tseil-Waututh) territories home of the Hul'q'umi'num', SENĆOŦEN and Skwxwú7mesh Sníchim speaking peoples. We acknowledge colonization's historical and present-day practices and recognize that poverty is interwoven with colonization, oppression and genocide. We strive to be in solidarity with Indigenous peoples and communities in the assertion of Indigenous peoples' rights, cultural practices, land defence and food harvesting.



**Canadian Mental
Health Association**
British Columbia
Mental health for all

Consultation on Together BC: BC's Poverty Reduction Strategy

Submission from the Canadian Mental Health Association BC Division

April 30, 2023

WHO WE ARE

Founded in 1918, the Canadian Mental Health Association (CMHA) is the most established, most extensive community mental health organization in Canada. We are a federated charity with 87 local, provincial and national locations. At the national and provincial level, we push for system and policy change. At the community level, millions of people in Canada rely on CMHA's extensive grassroots presence, including 14 local branches across BC.

Vision: Mentally healthy people in a healthy society.

Mission: As the nation-wide leader and champion for mental health, CMHA facilitates access to the resources people require to maintain and improve mental health and community integration, build resilience and support recovery from mental illness.

Mandate and Scope: Mental health, substance use and addictive behaviours are within the scope of CMHA BC Division.

Approach: Our goal is for people with mental health and substance use challenges to live fulfilling lives in the community. Lived experience guides us, as does the social determinants of health. We believe that the voices of people with lived and living experience (PWLLE) should be centered during the development of policies and programs.

INTRODUCTION

There is a complex two-way relationship between mental health, substance use and poverty. People experiencing mental illness and/or substance use are at increased risk of living in poverty because of stigma, discrimination, social exclusion, additional healthcare costs and barriers to employment. Conversely, people living in poverty face increased risk of experiencing stress and trauma, which has a strong correlation with mental illness and problematic substance use; economic security is a key determinant of mental health and wellbeing.¹ Additionally, an adequate standard of living is critical to supporting the recovery of a person experiencing mental health or substance use-related illness.

The relationship between poverty, mental health and substance use is even more complex for people who experience additional forms of social exclusion or marginalization. For example, Indigenous people grappling with the impacts of inter-generational trauma and the ongoing consequences of colonization face disproportionate rates of poverty, mental illness and problematic substance use;² the impacts of stigma, discrimination, cultural interference and poverty are deeply intertwined.

This submission to the consultation on Together BC: BC's Poverty Reduction Strategy focuses on the gains that have been made for people living in poverty – in particular those for whom mental illness and/or substance use intersect with poverty – as well as the gaps that continue to perpetuate poverty in our communities, especially in the context of unprecedented factors like Covid-19 and climate-related disasters. In particular, we will focus on three key areas of feedback that are most pressing for the people we serve: mental health and substance use supports, income and employment supports, and housing. We include a number of recommendations, some of which have not changed since our [2018 submission](#) for the consultation on the development of Together BC. Overall, significant gains have

¹ Funk, M. et al (2012). Mental health, poverty and development. *Journal of Public Mental Health* 11(4), 166–185. Retrieved from <https://core.ac.uk/download/pdf/9694016.pdf>.

² First Nations Health Authority (2012). *A Path Forward: BC First Nations and Aboriginal People's Mental Wellness and Substance Use – 10 year Plan*. Retrieved from <https://www.suicideinfo.ca/wp-content/uploads/2013/09/20130858-A-path-forward-BC-First-Nations.pdf>.

been made, but there is still a lot of work to do. We are grateful to the Government of BC for the opportunity to provide feedback on this important work.

MENTAL HEALTH AND SUBSTANCE USE SUPPORTS

CMHA BC often hears from individuals with mental health and substance use (MHSU) challenges, their loved ones and their service providers that when attempting to access supports, they are presented with lengthy waitlists, strict eligibility criteria, lack of trauma-informed and/or culturally safe services, and a confusing system that is difficult to navigate.

Instead of addressing MHSU issues early on, BC's MHSU system relies heavily on acute care to address these issues only once they become a crisis. BC's rates of hospitalization due to MHSU disorders are higher than the national average.³ Even more troubling is the continuously increasing rate of involuntary detentions under the *Mental Health Act* in BC, which is the highest in Canada.⁴

In BC, we have a two-tiered system where individuals who do not have extended health benefits and/or cannot pay for private services do not have timely access to early intervention and treatment for mild to moderate MHSU challenges. Those experiencing mental illness are often unable to access supports early on in their illness when the negative impacts to their economic security could be prevented or minimized (e.g., loss of employment, housing etc.). Instead, their health declines into a crisis that is serious enough for them to access care through the hospital or criminal justice system, often resulting in poverty, instability and ultimately harm. This is the most expensive way to provide health and social services. Supporting mental health and wellbeing before a crisis is a key factor in addressing poverty.

Measures to prevent the spread of Covid-19 during the pandemic had unintended consequences on mental health. Isolation, loneliness and stress due to financial strain impacted all British Columbians, but were particularly tough on people with pre-existing MHSU challenges who lost access to their usual in-person services. The psychological effects of Covid-19 continue to impact British Columbians.

CMHA BC applauds the Province for making record investments in the MHSU system since 2017, and for its ongoing progress implementing [A Pathway to Hope](#). Budget 2023 invests \$1 billion in new funding over three years to expand MHSU services, including for important transformational services like CMHA BC's [Peer Assisted Care Teams](#), that offer an alternative to police in responding to mental health crises. We also welcome three more years of funding for [free and low-cost community counselling services](#) that provide pivotal psychological supports to low-income British Columbians.

Budget 2023 has a significant focus on treatment and recovery services for individuals with complex mental health and substance use disorders. While investment is needed in every corner of the system, we continue to see gaps in investments in upstream promotion, prevention and early intervention supports for mild to moderate MHSU challenges.

RECOMMENDATIONS

1. Ensure that all people in BC, including children and youth, have access to coordinated, timely, culturally safe, person-centred and evidence-based mental health and substance use services in

³ Based on Canadian Institute for Health Information data on mental health and substance use disorder discharges found at <https://www.cihi.ca/en/indicators/mental-health-and-substance-use-disorder-discharges>.

⁴ Loyal, J. P. et al. (2022). Trends in involuntary psychiatric hospitalization in British Columbia: Descriptive analysis of population-based linked administrative data from 2008 to 2018. *The Canadian Journal of Psychiatry*, 68(4), 257-268. Retrieved from <https://journals.sagepub.com/doi/full/10.1177/07067437221128477>.

their communities across the full spectrum of care, ranging from prevention and early intervention to treatment and recovery.

2. Continue investing in community-based MHSU services that provide holistic supports grounded in the social determinants of health, as well as important mental health promotion, prevention and early intervention services.
3. Continue to expand access to supports for British Columbians experiencing mild to moderate MHSU challenges, including through free and low-cost community counselling services and other innovative approaches that prioritize equity and access (e.g., virtual supports for remote and rural communities, Indigenous-led services, services for newcomer and refugee communities etc.).

INCOME AND EMPLOYMENT SUPPORTS

Income security and employment are important social determinants of health that can have a significant impact on mental health and wellbeing. While many people who live with a mental illness or substance use disorder are able to maintain regular employment throughout their lives, others may experience barriers to employment as a result of disability and/or periods of instability in their mental health.

CMHA BC applauds the Province's continuous increases to income and disability assistance since 2017, as well as steady increases to earnings exemptions limits. However, as assistance rates and exemption limits have increased, so has inflation and general costs of living. The latest Market Basket Measure (MBM) for BC, based on cost-of-living calculations for 2020, ranges from \$43,069/year for rural areas to \$50,569/year for Vancouver.⁵ Based on the increases announced in Budget 2023 that won't be in effect until July 2023, a single person on income assistance who earns the maximum amount exempt through employment will have an annual income of \$19,920. A single person on disability assistance who earns the maximum amount exempt through employment will have an annual income of up to \$34,008. While improvements have been made, the discrepancy between the MBM and the annual income of those on assistance reinforces conditions of poverty.

Related, many peer workers in the MHSU sector also receive income or disability assistance. Peer employment continues to be a burgeoning area of the sector and provides people with lived and living experience with meaningful work. CMHA BC is grateful to the Province for recognizing the importance of peer workers in the provision of MHSU care and the development of policies and programs.

The [legislation and policy manual](#) that governs income and disability assistance includes an exemption on assistance deductions for peer support workers if their employer is a designated agency. CMHA BC recently undertook a study on peer employment in BC⁶ and found that many peer workers, their employers, and Ministry of Social Development and Poverty Reduction (MSDPR) workers are unaware of this exemption. CMHA BC found that employers may not pursue the exemption for their peer staff because information on how to be a designated agency is not publicly available and the scope and intent of the policy is unclear. Furthermore, the policy manual includes an outdated definition of "peer support" and lacks consideration of the broad range of peer roles that exist in the sector. Addressing these issues presents a significant opportunity to address income security among peer workers in BC.

Finally, there has been some progress on moving beyond a one-size-fits-all employment support model for people with MHSU challenges who experience barriers to employment. In February 2023, the

⁵ Statistics Canada (2022). *Market Basket Measure (MBM) thresholds for the reference family by Market Basket Measure region, component and base year*. Retrieved from <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110006601>.

⁶ CMHA BC will be releasing a report in summer 2023 that includes the findings of this research project, as well as systemic recommendations for the Province of BC to advance peer employment and empowerment in BC.

Province announced the expansion of CMHA BC's [Links to Employment](#) program, which helps remove barriers that people with complex care needs face on their journey to long-term recovery by incorporating employment interventions into their treatment plans. This program has shown promising results for improving client wellbeing and connecting them with meaningful employment.

RECOMMENDATIONS

4. Increase income and disability assistance rates to reflect the actual cost of an adequate standard of living, as well as indexing them to inflation. Disability assistance rates should be high enough that they bring recipients over the poverty line based on the most recent Market Basket Measure.
5. Enhance awareness and education on the peer work income exemption, expand the eligibility for the exemption to all types of MHSU peer work in BC, and include a streamlined process for peer-employing organizations to become designated agencies.
6. Create a funding stream exclusively for peer employment that is accessible to health authorities, non-profits and peer-run organizations that are a part of the MHSU sector. Employment conditions such as liveable wage and benefit provisions should be mandatory for eligibility for the funding, which should be reviewed annually and provided on a recurring, annual basis.
7. Continue to support the integration of evidence-based employment programming into treatment and recovery for individuals with complex MHSU challenges who experience barriers to work.

HOUSING

Affordable, safe and secure housing is a fundamental determinant of health. Rising rental rates and low vacancy rates disproportionately impact people with disabilities, including those living with MHSU challenges, who are more likely to be unable to keep or obtain adequate housing. As a result, they also experience disproportionate rates of housing insecurity and homelessness. These individuals experience better outcomes when they are given agency in their housing options, these options address their individual needs, and where appropriate, health and social services are attached.

Over the past several years, the Province has taken many steps to address the lack of housing supply and disincentivize the financialization of housing. While many of these approaches address market housing (e.g., speculation and vacancy tax, changes to permitting etc.), huge gaps remain in non-market housing provision. CMHA BC and local branches who provide non-market housing in their communities welcome the new [Homes for People](#) action plan and encourage the Province to invest even more in helping those with the greatest housing need through a variety of tactics including the provision of social and supportive housing, rent supplements, Rent Bank loans, homelessness diversion programs and more.

Related, the Province must do more to stop the cycle of homelessness for people who are chronically unhoused. Temporary shelters are not permanent solutions to homelessness and can perpetuate this cycle. Temporary housing service providers are increasingly faced with the tension of keeping people alive and safe, the moral and financial obligation to provide a standard of care with their services, and the ethical need to advocate for better, more dignified long-term solutions to addressing housing needs.⁷ People need to be able to go from the street to shelter, and from shelter to housing; however for many people, shelters are often the last stop on this continuum because there is a lack of safe, affordable and person-centered housing options available to them.

⁷ For example, see a [public statement](#) from CMHA Kamloops on their response to temporary winter shelters.

Because of the unstable and inconsistent nature of temporary shelters, coupled with restrictive policies from some service providers, and a lack of safety for residents, some people prefer to remain living outside on the streets or in encampments. While the Province has announced their commitment to address encampments, the reality is that there are not enough dignified and appropriate housing options to meet the demand. Research has shown the negative impacts of displacing encampments on the individuals who have been displaced, including increasing the risk of overdose for people who use drugs, reducing access to health and social services, and social isolation.⁸ When these displacement efforts are undertaken by police, as we have seen in Vancouver's Downtown Eastside recently, we further stigmatize and entrench the narrative that being poor and unhoused is crime.

Finally, CMHA BC welcomes an increase to the shelter portion of income and disability assistance rates announced in Budget 2023. While \$500/month is a much-needed improvement, it barely makes a dent in the average rent of a one-bedroom in BC, which is now \$2,471/month.⁹ Furthermore individuals who are on income or disability assistance, who are already living under the poverty line, still are unable to access the [Rental Assistance Program](#) (RAP) or the [Shelter Aid for Elderly Renters](#) (SAFER) program.

RECOMMENDATIONS

8. Continue to increase BC's affordable housing stock across the housing spectrum, with particular emphasis on social and supported housing and culturally safe housing. Attach health and social services when appropriate to support people to maintain their housing.
9. As much as possible, allow for flexible housing supports that are tied to the person and not the unit; when that is not possible, coordinate and improve transitions across the housing spectrum as an individual's needs change.
10. Support temporary shelter operators to provide robust health, mental health and service navigation supports. Planning for seasonal shelters should start well ahead of seasonal changes in weather so that people are not forced to be exposed to harsh conditions.
11. Ensure that people living in encampments are not displaced until they are provided appropriate housing that addresses their needs. Responses to encampments should be trauma-informed and centered on support, not force or punishment.
12. Unify the RAP and SAFER housing subsidies and expand access to include all low-income renters, including those in receipt of income and disability assistance and increase the shelter rate with the goal of aligning with average housing costs. This could be dependent on the region in which a person lives.

⁸ E.g., see <https://themainlander.com/2023/04/14/an-open-letter-from-academics-against-vancouvers-encampment-evictions/>

⁹ Rentals.ca (2023). *April 2023 rent report*. Retrieved from <https://rentals.ca/national-rent-report>.



The Punishing Bureaucracy of Welfare: Recommendations to improve income assistance provision Submission from Care Not Cops

Endorsed by BC Poverty Reduction Coalition, Dudes Club Society, Disability Alliance BC, Sanctuary Health, Coalition of Peers Dismantling the Drug War, South Asian Mental Health Alliance & Pivot Legal Society

This document contains policy recommendations within a framework of reducing the **punitive and carceral approach** the Ministry of Social Development and Poverty Reduction (MSDPR) brings to service provision. Recommendations are made with recognition that income assistance remains rooted in harmful '[workfare](#)' culture, but with the spirit of mitigating the harm, stress and distrust this has created.

This report urgently requests that the MSDPR **immediately raise the rates** for the main classifications of financial support, income assistance (IA) and disability rates (PWD), by **minimally tripling the non-shelter rates** and indexing rates to inflation. For example, this would increase the single person monthly IA rate from \$560 to \$1680, and PWD from \$983.50 to \$2950.50. In the absence of rent-geared-to-income and other accessible social housing, the shelter rate should be made flexible to meet the housing crisis with the response people deserve across regions (i.e., the average cost of appropriate housing in a given area). This change would be a life-saving intervention as mortality rates have [long been](#) linked to income in Canada. Poverty kills.

The 22 recommendations that follow strive to align with broader disability justice movements, particularly those that champion [cross disability solidarity and collective liberation](#), where no bodies are left behind, as well as orientations of equity and justice. These are changes that could be made in the immediate term without causing undue harm in the process.

Many of the recommendations share a thread of promoting access to fundamental necessities including healthcare, housing, nutrition, and identification documents needed to access essential services and maintain a dignified quality of life. These recommendations honour family, kin and community, and intend to relieve unnecessary burdens that people living in poverty experience while navigating this system. (Please note that both PWD and IA are classified together as 'IA,' unless otherwise stated).

Recommendations

1. Abolish the financial penalization of couples.

Rationale: Couples who live together and access IA have their supports cut by approximately \$300. This can be a barrier to pursuing healthy relationships or leaving unhealthy ones. It causes various other challenges, including in the case of death, as the bereaved partner can be denied recognition as next of kin. It is a deterrent to be transparent about partnerships to care providers, limiting therapeutic relationships and supports.

2. Immediately discontinue PWD 'spousal restrictions.'



Rationale: Care Not Cops supports calls to ‘[can the cap.](#)’ Individuals are denied access to PWD if their partner is not MSDPR affiliated and earns more than \$1,948 per month. No earning exemptions exist for spousal income, which is deducted from payments. This prevents people from having their own income source, creates barrier for the progression of healthy relationships, and can trap people in abusive ones. A recent government commissioned report found that single, working-age women have the [highest rate of poverty in BC](#), and experience [double the violent victimization](#) of men nationally. [One survey](#) reports that 3 out of 5 trans women report having experienced intimate partner violence (rates of intimate partner violence remains under-measured outside of the gender binary).

3. Make direct deposit an option beyond cheque day.

Rationale: People deserve autonomy over how they receive their income. There is a significant association between cheque day and [overdose deaths](#). Currently, if people split their cheque voluntarily, some of the payments have to be physically picked up. Using threats of ‘splitting’ someone’s cheque involuntarily, however, should cease to be an option.

4. Low barrier coverage of all funeral expenses arranged by formal or informal relations of someone who has passed away as an active recipient of IA.

Rationale: Funeral coverage is limited to cremation or local burial. Little funding is available to transport the deceased person to another community, or to obtain a reasonable casket and/or appropriate spiritual items. Supporting this takes intensive coordination across a number of services. For many, this means an inability to participate in ceremony in their respective homelands, a possible contradiction of Article 11 of [UNDRIP](#).

5. Immediately end the requirement of monthly income stub reporting.

Rationale: Care Not Cops agrees with the broad recommendation by the [British Columbia Expert Panel on Basic Income](#) to terminate all workfare-oriented policies. Many people do not have the technology required to submit on ‘My Self Serve,’ which is difficult to operate regardless. This creates an added burden of attending a physical office and waiting in line.

6. Terminate the practice of requiring reports of ‘any other kind of money received’ outside of employment income.

Rationale: Living in poverty often means being compelled to find informal ways to generate income, including sex work, selling used goods, and binning or collecting cans. These reporting requirements incentivize riskier ways to receive payment and store money; and it can mean harassment from MSDPR workers or suspension of essential supports.

7. Increase threshold for current asset limits for applicants of IA from \$5,000 to the level of the annual exemption (see: #8), and eliminate asset tests for re-accessing. Eliminate the two-month wait from loss of work to being eligible for support.

Rationale: Care Not Cops supports the [British Columbia Expert Panel on Basic Income’s](#) similar recommendation to eliminate asset tests for people on regular assistance if they access IA multiple times, particularly because people with disabilities frequently experience discrimination in the



workplace, and the process of claiming wrongful dismissal is inaccessible for most. This can contribute to individuals falling further into the cycle of poverty.

8. Immediately increase the annual earnings limit from \$15,000 to \$34,999, followed by 20 cents reduced for each dollar earned between \$35,000 and \$44,000.
Rationale: Strict and low annual earnings limits pose barriers for people to obtain employment and compounds harm by ensuring people receiving this benefit remain in poverty. Allowing more people to become eligible for PWD while they are working will facilitate earlier access, so the support can truly act as a safety net, and not as a last resort for when people's health has severely declined.
9. Never withhold an entire cheque for administrative reasons.
Rationale: Low level IA supports compel the need to take on interpersonal and formal debts with an expectation that repayment will occur on the day of cheque issue or immediately afterwards. Withholding an entire cheque puts people at risk of violence and further debt.
10. Discontinue cutting off rent and financial support payments to people who become incarcerated for longer than three months; and permit all people with warrants or who are incarcerated to apply for income support as new recipients.
Rationale: Discharge from prison to homelessness and complete poverty increases numerous measured 'risk factors,' including overdose death (BC government reports that people who have experienced incarceration are [7 times more likely](#) to die by overdose). Warrants are issued for wide-ranging reasons, and keeping people in poverty does not increase safety.
11. Immediately end the requirement to share details of an unexpected event to access a food, shelter or clothing crisis supplement. This includes never asking for a police file number.
Rationale: This worker discretion is costly in wages for the MSDPR and other organizations. It is seemingly rooted in an idea that people living in poverty should not be trusted. It is not trauma-informed to request that people share stressful or traumatic events without adequate mental health support. Instead, offer transparent guidelines to crisis grant limits and amounts that can be accessed as needed.
12. Triple the food crisis grant that is available max. once per month from \$40 to \$120.
Rationale: [BC Stats](#) shows food prices increased by 9.8% from February 2022 to 2023 (\$40 was set several years prior). The current food crisis grant does not reflect current food prices.
13. Create a pathway for people who are undocumented to receive the full array of MSDPR support. Develop a slush fund for MSDPR workers to administer directly to healthcare facilities when MSP is inaccessible based on immigration status.
Rationale: Many people face barriers to obtaining immigration status or adequate documents. This change would ensure access to supports regardless of immigration barriers, as well as fair and equitable healthcare to all.
14. In collaboration with the Ministry of Health, abolish the 3-month waiting period for Medical Service Premiums (MSPs) coverage by including automatic coverage for those



who have successfully applied for IA; and cover MSP costs for international students while working toward the elimination of these MSP fees altogether.

Rationale: Care Not Cops strongly supports [Sanctuary Health, the Centre for Gender & Sexual Health Equity's and IRIS](#) call to 'end the 3-month wait.' Emergency healthcare coverage can be advocated for via the Ministry of Health, this drains worker resources and should not be necessary.

15. Include permanent residence cards (new and replacements) in coverage under ID supplement funding.

Rationale: Other forms of ID are covered to reduce barriers from healthcare to employment, the same logic should be applied for people seeking their federally administered permanent residency card.
16. Develop in-house MSDPR language services to give people the option to schedule appointments and interact with the system in their respective language.

Rationale: Language can be a major barrier to accessing support, and coordinating across multiple services to navigate the system is extremely difficult.
17. Create and rapidly scale-up a pathway for non-MSDPR workers to approve crisis funds through a certification program.

Rationale: This change would empower community resources to directly support people, and decrease the number of MSDPR phone calls and office walk-ins. Organizations such as BC Housing have trained community partners to complete certain housing assessments, the MSDPR should consider this approach.
18. End the practice of reducing income and rent for those participating in accredited treatment or residential care programs that have fees; instead pay the facility fees directly.

Rationale: Care facilities tend to only provide people's basic survival necessities, not other bills and costs. For some, this is a primary barrier to attending a care or treatment facility.
19. Discontinue sending letters to PWD recipients to consent for CPPD eligibility.

Rationale: Instead have this completed during the application process, with the option to be revoked; 'grandfather' in current recipients. This letter uses jargon that leaves some PWD recipients afraid of their income being discontinued. The administrative paperwork is extremely complex and confusing, and puts people at risk of having their PWD temporarily suspended.
20. Offer direct funding for housekeeping or cleaning services for those who need it.

Rationale: Cleaning and housekeeping, especially with many people forced to live in inadequate shelter, can be extremely difficult for those living with a disability(ies). Home support programs almost exclusively support with physical self-care tasks such as bathing and dressing, and are largely inaccessible due to strict criteria and program capacity.
21. Move away from 'third party agreements,' where an outside non-profit takes over the administration of a client's income assistance if their behaviour has been labeled 'challenging' or 'aggressive.'



Rationale: This process limits access to MSDPR community integration support workers, and other supports, which compounds marginalization and exclusion from state services. Many of these recommendations would reduce conflict overall between recipients and workers if taken in full.

22. Develop capacity for MSDPR to complete BC Services cards in-office.

Rationale: Not having adequate photo ID can perpetuate barriers to activities of daily living, for example public transit (not having photo ID that matches a Compass Card can result in ticket and targeting by transit police), accessing the Greater Vancouver Food Bank, accessing healthcare facilities, obtaining a bank account, etc. ICBC requires attestation for people who do not have other ID, and not everyone can access somebody that will take the time, and be eligible for the attestation requirements.

In addition to the costs saved by lifting people out of poverty across different areas of government, including decreased reliance on policing, many of these recommendations would directly reduce costly MSDPR worker discretion and create clear standards. They would likely positively impact rates of burnout and moral distress. Minor ‘tweaks’ have added more confusion to this complex and carceral system. This drains public resources through numerous organizations, often funded by similar areas of government, that provide support to navigate ministry services (i.e., two \$28-40 per hour workers debating whether to release a \$40 dollar crisis grant to an individual).

These recommendations have been created with consideration of the social determinants of health, by a group of health and social service workers who have witnessed and/or experienced the barriers IA recipients face while navigating this system. These changes will positively impact the lives of people who often experience intersecting means of oppression and improve public safety, with the acknowledgement communities should continue to be made stronger than these reforms.

Funding symbolic solutions, such as ‘systems navigators’ without a surplus of support to navigate (a role some of the authors get paid to do, but remain critical of); ‘housing hubs’ with no additional housing; or shifting the shelter rate to \$500 from \$375, are not solutions. They tend to further complicate the bureaucracy of income security in BC. **These recommendations call for much broader transformation.** Material resources should be transferred as directly as possible to the people who need them. Increased bureaucratic processes equates to more wealth being stolen on route by labour wage and organizational administrative costs, while only adding to the stress and trauma of trying to survive while living in poverty in BC.

Authors (alphabetical): Karis Bergsma, RSW, Navi Dasanjh, RSW, Serena Lee, RSW, Tyson Singh Kelsall, RSW

Editors (alphabetical): anna jackson, jasmine veark, justine little, RSW, Kahlid Salem, karina czyzewski, Nina Taghaddosi, RSW, Shireen Soofi



Government of BC Poverty Reduction Plan City of Richmond Feedback

Social inequities that perpetuate systemic barriers and growing affordability pressures can leave certain households increasingly vulnerable to being at risk of or living in poverty. The City of Richmond (the City) and its partners are committed to advancing efforts through a collaborative approach that involves all levels of government, including the Province, community organizations and Richmond residents to help reduce and prevent poverty in Richmond. As municipalities are uniquely positioned to understand, advocate and address the needs of those who live in their community, the City has prioritized community-informed policy and planning and implemented a number of initiatives to prevent and reduce poverty and homelessness. Working in partnership with the Provincial Government, the City and its partners are dedicated to ensuring that the necessary services and supports are in place to help break the cycle of poverty.

A. Background

Through collaboration with community-based organizations and residents with lived and/or living experience, the City has developed several action-oriented frameworks, including a Poverty Reduction Plan, Homelessness Strategy and Affordable Housing Strategy. By leveraging existing assets, the City and its partners have advanced efforts to improve access to social services, community-based programs and supports, and affordable housing within Richmond. These include:

- Providing funding to non-profit community organizations in Richmond through the City's Health, Social and Safety grants program, which has provided a total of \$5,335,701 to support the provision of a broad range of social service programs in the city since 2013;
- Continuing to be leaders in affordable housing in the Metro Vancouver Region, including being the only municipality with a mandatory city-wide inclusionary zoning program, that has secured over 1,500 affordable and non-market rental units since 2007;
- Working to secure 85% of all Low-End Market Rentals (LEMR) and non-market units as Basic Universal Housing;
- Opening Aster Place Supportive Housing, in partnership with BC Housing and Community Builders, to provide 40 units of housing with 24/7 wrap-around support services for Richmond residents experiencing homelessness;
- Facilitating access to a wide range of parks, recreation and cultural programs for residents of all ages in financial hardship through the City's Recreation Fee Subsidy Program, which has supported over 8,850 residents since 2018; and
- Implementing the Menstrual Equity Initiative which provides access to free menstrual products in 30 City public washrooms, including dispensers at the Cultural Centre, Richmond Public Library, arenas, aquatic centres, community centres, and most recently, City Hall, City Hall Annex, and the Public Works Yard with the goal of removing barriers to participation related to period poverty and menstrual stigma and promotion of inclusion and gender equity for girls, women, non-binary and transgender people in Richmond.

Recent provincial funding provided through two grants, the UBCM Strengthening Communities' Services grant and the Poverty Reduction Planning and Action grant (i.e. Stream 1: Poverty Reduction Plans and Assessments and Stream 2: Poverty Reduction Action) has further supported the City and its partners in successfully implementing the following initiatives:

- Launching a Drop-in Centre and Shower Program to provide meals, laundry and shower services, counselling, housing location support, resource referrals, and other supports for individuals experiencing homelessness;
- Operating two winter weather Warming Centres to provide overnight shelter, warm drinks, snacks and meals to individuals who shelter outside and whose health may be threatened during periods of extreme cold;
- Partnering with Vancouver Coastal Health to provide clinical services to support unhoused clients; and
- Implementing monthly Community Services Pop Ups at the Richmond Public Library to connect individuals and families at risk of or living in poverty to community-based programs and resources.

B. Current Community Profile

Despite these efforts, the City continues to see increased need in Richmond with more residents seeking community supports to meet basic needs, including subsidized housing and emergency food programs.

There are a range of social and demographic groups that are affected by housing unaffordability, with the greatest challenges seen in low and moderate income households earning under the median income (i.e. under \$79,000 per year in Richmond). As identified in the City of Richmond's Housing Needs Report in 2021, half of Richmond renters could not afford most market rentals and the number of Richmond households experiencing core housing need grew by over 3,000 between 2006 and 2016. While the COVID-19 pandemic exacerbated housing affordability in Canadian cities, the upward pressure on rents from inflation and rising interest rates is anticipated to continue. These ongoing affordability pressures are also reflected in the continuous rise in the number of Richmond households on BC Housing's Applicant Registry and as of December 31, 2022, there were 1,223 households on the registry, an increase of 149 households from the year before. In particular, the senior's population is showing indications of increased vulnerability and in 2022 represented approximately 50% or 610 of the total number of households on the Registry.

Growing affordability pressures in combination with rising food costs are also resulting in a significant increase in the number of households accessing emergency food supports, with the number of households supported by the Richmond Food Bank almost doubling from 2020 to 2022 (i.e. 1,881 households supported in 2020 to 3,387 households supported in 2022).

Richmond has also seen a notable rise in the number of individuals experiencing homelessness. Based on data from the BC Employment and Assistance program, individuals receiving income assistance with no fixed address increased from 42 individuals in 2015 to 131 individuals in 2022. As well, the Homeless

Count in Metro Vancouver, which is often regarded as an undercount, identified a 21% increase of Richmond residents experiencing homelessness, from 70 in 2017 to 85 in 2020, with an updated count expected to be released in fall 2023.

C. Required Supports

The Richmond community has benefitted from the Provincial grant programs that have been introduced and awarded to the City in the past three years. Recognizing the ongoing need for collaboration across all levels of government, the City has identified the following areas that require additional supports from the Province, including long-term and/or sustained funding, to reduce and prevent poverty and homelessness in Richmond.

Poverty reduction:

- Provincial funding is requested for the City to strengthen its local food systems to help build resiliency in communities and work to transition food networks away from charity-based models to more sustainably-funded services.
- To support people at risk of or experiencing homelessness, an increase to provincial rental housing subsidies is required to help cover a more sustainable rental rate. This includes particular consideration for subsidies offered through the SAFER program with the senior's population demonstrating increased and growing need for access to affordable housing.
- Taking into account how a lack of affordable transportation serves as a barrier to accessing opportunities, such as employment, education and community supports, needed to move out of poverty, the implementation of a free or low-cost transit program (for ages 13-64 years) is recommended to help individuals and families at risk of or living in poverty.
- An expansion of the \$10 a Day child care funding program and/or an increase to funding for the Fee Reduction Initiative for programs not included in the \$10 a Day program is requested to support families with young children. Additionally, the implementation of a wage grid for Early Childhood Educators to enhance wages for this critical workforce is recommended to help ensure sustainability of the child care system.

Homelessness:

- To meet the increased and growing need among Richmond's most vulnerable community members experiencing homelessness, sustainable provincial funding is required for operations to proceed at the Drop-in Centre and Shower Program and the Warming Centre/Extreme Weather Shelters after completion of the one-time provincial grant funding by the end of 2023.
- Further provincial funding is also requested to implement additional shelter spaces and more supportive housing options to assist residents who are experiencing homelessness with attaining their basic needs and gaining access to community-based supports and resources.
- As well, expanded coverage under the Provincial Medical Services Plan (MSP) is recommended in order to improve access to health care and dental care services for people who are experiencing homelessness.

- To support the growing number of people experiencing unsheltered homelessness in the community, ongoing provincial funding for increased and dedicated community outreach and support, including weekend and after-hours supports, is also suggested.

Affordable housing:

- Significant and sustained provincial funding investments are required to develop non-market housing in Richmond, which currently makes up just 4% of Richmond's total housing stock, for low-income households. While recent announcements have been made regarding new Federal funding opportunities, support is needed for ongoing advocacy efforts with the Government of Canada to leverage additional funding through the Canada Mortgage and Housing Corporation and other federal departments.
- The provision of an ongoing provincial grant program or other funding for municipalities is recommended for the City to access resources to acquire and hold City land for non-market housing projects. Rising land values currently pose significant challenges to dedicating City land for future non-market housing projects.
- To support land acquisition and other associated costs related to affordable housing, the introduction of new municipal revenue tools by the Province is also requested for use in generating funding for affordable housing developments.

Of the items noted, the City recognizes the top three priorities for Richmond over the next five years and beyond focus on: 1) An increase to the provincial rental housing subsidies to help cover a more sustainable rental rate, 2) Sustainable provincial funding for operations to proceed at the Drop-in Centre and Shower Program and the Warming Centre/Extreme Weather Shelters, and 3) Further provincial funding to implement additional shelter spaces and more supportive housing options in Richmond.

The City of Richmond and its partners understand the importance of addressing poverty and homelessness and appreciate the opportunity to contribute to the development of the BC Poverty Reduction Plan. Through ongoing dialogue and collaboration across all levels of government, the City and its partners look forward to advancing local efforts to address the current and emerging needs in the community.

**Vital, Strong and Public: CUPE BC submission to the BC
Government's 2023 TogetherBC Poverty Reduction
Strategy Review**

April 30, 2023



Introduction

The B.C. Division of the Canadian Union of Public Employees (CUPE BC) appreciates the opportunity to advocate for its members and the working class of B.C. with a submission to the TogetherBC Poverty Reduction Strategy review.

CUPE B.C. represents approximately 1 in 50 B.C. workers –more than 104,000 members who deliver our province’s core public services, including childcare, community social services, public education, community health, local government, transportation, emergency services, and library services. CUPE B.C. members are some of the workers on the frontlines of public-facing poverty reduction work. Further, CUPE B.C. members are middle-class working people; many of whom, despite being unionized public sector workers, are struggling to make ends meet in the face of widespread pay inequity and astounding wealth inequality in our province.

With devastating increases to the cost of living without commensurate pay raises, frontline supports are being delivered at sites where services such as internet are freely and publicly available; for example, our province’s libraries and public schools. In this submission we focus on four areas of poverty reduction which we are positioned to speak to with the working citizens of British Columbia in mind:

- **Ensuring public childcare is delivered in public schools as part of the education system,**
- **Preserving libraries as community hubs, especially as other public services retract from frontline service provision,**
- **Public transportation that is firmly situated in the public sector,**
- **The urgent need for rapid growth of non-market housing supply.**

With our submission, we draw attention to the importance of public services on reducing poverty, and to the too-frequently precarious and underpaid positions of the workers who deliver these services. We also recognize that there are numerous policy changes necessary if poverty is to be meaningfully reduced. Therefore, in addition to our own recommendations, we support the seven recommendations of the B.C. Poverty Coalition to which we are a member organization.

Recommendation 1: Universal public childcare as a strengthening of the public K-12 education system

Context: We commend the B.C. Government for the over 12,700 licensed childcare spaces throughout B.C. that have become available at the \$10aDay charge since the signing of the bilateral Early Learning and Child Care Agreement. It is positive that these spaces are primarily public, non-profit, and Indigenous led. Much of this movement is due to the tireless advocacy of

the \$10 A Day Campaign for an affordable, public system of early learning and care.¹ Yet there has been relative silence from the B.C. Government on two key issues: a formal plan to institute *universal* before and after-school care, and the huge social benefits of locating a universal childcare program in the public sector.

Childcare within the public sector as a strengthening of the K-12 system, employing unionized workers, would be a life-changing benefit for working families and childcare workers alike. CUPE B.C. appreciates that this government recognizes the profound equity and justice impacts of ending precarious and underpaid contracted out work. The historic return of over 4,000 health services jobs in housekeeping and food services to the BC public sector since 2021 shows that strengthening public services by ending contracting out is feasible on a large scale. More childcare provision means more wins for poverty reduction, worker equity and justice, child and youth development, and support for parents currently piecing together care through multiple systems.

BC children and families deserve a unified system that guarantees the right to accessible and high-quality childcare, addresses job equity for a gendered and racialized workforce, considers the downfalls of for-profit childcare, and addresses the problem of women being assigned primary responsibility for family administration. Our schools are the grounds on which to do this work. Our Ministry of Education and Child Care can, and should, be the leader in taking the step forward to public sector childcare, for the health, well-being, and equitable development of BC children.

Actions:

- Full implementation of the \$10aDay Child Care Plan, including full funding for school districts to operate childcare across jurisdictions
- Provision of universal access to before and after school care on school grounds, as per the recommendation of the \$10aDay Child Care Plan
- Develop and fund an equity-focused integrated model of before- and after-school childcare to improve access to affordable (no more than \$10 a day), high quality childcare, and to improve children’s learning outcomes throughout their school years

Recommendation 2: Long term increases to funding for public libraries

The pandemic intensified the role of libraries as core public locations that connect people to their communities. The retraction of public assistance from local governments, provincial ministries, and federal departments has led to the public seeking increased help from library workers in areas outside of their sector, including healthcare and social service information, citizenship and immigration, navigating the legal system, and job searching. Libraries have

1

https://d3n8a8pro7vhmx.cloudfront.net/10aday/pages/2995/attachments/original/1642602021/10aDay_Roadmap_Second_Edition_Jan_17_2022_web.pdf?1642602021

become warming centres in the winter and cooling centres in the summer. They are free, safe, and educational spaces for children and youth. They provide refuge and social interaction to the most vulnerable members of B.C. communities. Library workers have experienced a significant expansion of the breadth of their work because of the changing climate and increased social precarity – but this does not mean they should shoulder the burden of assisting people with services beyond the scope of their training.

March 2023 provincial funding (of \$45 million over 3 years) from the provincial budget surplus allocates \$12.5 million to enhancement of services, with the bulk of the remaining funding allocated to local, regional, and provincial administrative support for library systems, rather than to libraries or library workers directly. Significantly, this one-time funding neither addresses the pay equity gaps that library workers suffer from relative to other sectors, nor the issue that despite being unionized workers, the bulk of library workers are in positions that are precarious, unstable, and irregular. Library workers are largely a feminized workforce, and the lack of investment into their jobs over the long-term keeps them rooted in working poverty.

Actions:

- Designated long-term investments in correcting the problems of pay equity gaps and precarious work embedded in the library sector
- Coordination between library systems, local governments, the Ministry of Citizen Services, and provincial ministries to improve citizen access to economic, social and health services, with support from experts in those government bodies
- Increased funding for library worker health and safety, including improved protections from safety incidents and improved worker mental health supports
- Improved funding for safety of library facilities and appropriate library staffing levels, considering the impacts of the toxic drug crisis and COVID-19 emergencies

Recommendation 3: Public transportation situated within the public sector

CUPE Local 561 transit workers were forced to fully withdraw their services as of March 20th, 2023, at address the harms they are experiencing due to privatization of the transportation system. These workers are employees of U.S.-owned company First Canada, an agent of privatization, who provide *only* human resource services – not infrastructure, buses, facilities, planning, routing, or maintenance, all of which is work done by B.C. Transit. Further, First Canada employees earn over 30% less than their neighbours who do the *very same work* for public service employers Coast Mountain Bus Company and TransLink. Unlike their colleagues at Coast Mountain and Translink. And after careers working for unequal wages, CUPE Local 561 and other transit workers employed by private contractors have no pension that would allow them to retire. This is a largely racialized workforce of citizens dedicated to serving their communities. They deserve retirement security and financial stability for delivering this core public service.

Additionally, the de-privatization of B.C.'s transit systems has the capacity to accomplish much more than justice and poverty reduction for workers. With taxpayer-funded, dependable, and subsidized transit, citizens can get to and from their workplaces more efficiently and cost effectively, alleviating transit as an additional stressor. Reliable accessibility services such as HandyDart have the power to increase the participation of people with disabilities in the workforce and improve access to healthcare services and are not well supported by a privatized system. Finally, as per the calls of the Single Mothers Alliance of B.C., a social justice-oriented public transportation system would provide free fares for youth through their teenaged years which would level the playing field in terms of access to specialized programming within the public school system, such as VSB Mini Schools which are often located outside of the neighbourhoods in which teens reside.

Actions:

- Publicly funded transit for all people of B.C., including those in rural areas
- Provide stable, well-paid jobs with fair benefits and pensions for workers in the transportation sector
- Implement the call of the Single Mother's Alliance for free transit to include youth aged 13 to 18 in all transit systems in B.C.

Recommendation 4: Urgent acceleration of non-market housing supply

In CUPE B.C.'s 2018 submission to the TogetherBC consultation, we referenced that in 2012 the richest 10% of people in B.C. held 56% of the province's wealth – the highest concentration of wealth at the top out of any province in Canada² and a shameful inequality. The distribution of ownership of real estate in this province is just as massively inequitable. The Statistics Canada Survey of Financial Security shows that in 2019, the population quintile with the highest net worth in the province held 55% of the net worth of B.C.'s residential real estate³. The remaining 45% is spread out among all the rest of B.C. homeowners: the remaining 4/5ths of homeowners. Only 15% of the total net worth of B.C.'s residential real estate is owned by the middle net worth quintile. No longer is there a guarantee that stable, well paid, employment will provide an opportunity to secure B.C. workers and their families appropriate and stable housing.

The housing crisis hits even harder for renters. In 2022, surveys of 475 CUPE members working in the emergency services and municipal sectors showed that these middle-class working renters were paying heavily into their landlord's mortgages: 44% of our survey respondents who rented reported spending 50% *or more* of their household monthly income on rent; up to

² Broadbent Institute (2014). Have and Have Nots: Deep and persistent wealth inequality in Canada. https://d3n8a8pro7vhmx.cloudfront.net/broadbent/pages/32/attachments/original/1430002827/Haves_and_Have_Nots.pdf?1430002827

³ <https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=1110004901>

80% is regularly reported. Working households paying such disproportionately high costs as these just to have a roof over their heads are in financially precarious positions and more vulnerable to houselessness in times of crisis.

Finally, the annual 2023 CMHC Rental Market Report makes clear the urgent need for vacancy controls on rental units. Market rents have been run up to an out-of-control level due to the lack of significant provincial controls on rent increases at turnover between tenants. It was reported by CMHC that the 2022 average asking rent for vacant units in Vancouver was a shocking 43% higher than the average rent for occupied units. Simultaneously, 2-bedroom apartments that changed tenants between 2021 and 2022 were re-released at rents that were 23.9% higher, on average. In contrast to this, 2-bedroom units that did not change tenants between 2021 and 2022 had average rents that increased 3.9%. Finally, and perhaps worst of all, the share of units affordable to renters with the lowest 20% of incomes in Vancouver account for only 1% of units.⁴

All of these profound inequities are products of a broken and inherently unjust model: the current model of private development as a remedy to the shortage of affordable housing. This model sustains a housing market in which working people have increasingly limited options for providing stable roofs over their heads, in which OAS and SAFER are no longer sufficient for seniors to live on, in which the middle class has few to no prospects for upward mobility or generation of financial equity, and which a best-case scenario for working people and families is precarious, inadequate, or extremely unaffordable housing.

Actions:

- We echo the CCPA B.C.'s call for a province-wide plan for massive construction of *non-market* housing, aiming for a quarter million units over the next decade, or 25,000 new non-market units per year
- Implement vacancy controls on all residential market rental units provincially
- Rapidly increase social housing province-wide, and affirm the right to housing of all citizens, especially those who face marginalization and economic vulnerability including but not limited to Indigenous people, women, seniors, children and youth, trans and gender non-confirming people, and single parents.

⁴ <https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/housing-markets-data-and-research/market-reports/rental-market-report/rental-market-report-2022-en.pdf?rev=2a0ed640-6c4c-435d-b13a-0faca94c0667>

A Poverty Reduction Submission with Recommendations on Reducing Disability Poverty

This submission is made on behalf of the BC chapter of Disability Without Poverty, a national disability-led movement advocating for the Canada Disability Benefit and the end of disability poverty. Updated October 2022, the BC government's webpage on Diversity of Disability stated that 20.5% of British Columbians between the ages of 15 and 64 live with a disability. They are disproportionately living in poverty. The Service Plan report in February 2023 states, around 118,000 people received monthly Person With Disabilities benefits (disability assistance or disability benefit) from the Ministry of Social Development and Poverty Reduction. That number does not include the 42,000 dependant children. The current provincial benefit is well below provincial and regional poverty lines. Reducing poverty is good socially and economically. We recommend actions that would reduce financial inequities and positively impact people with disabilities. With the recent release of the BC Budget, we see marginal improvements, but not nearly enough to impact the systemic poverty in BC for many people with disabilities. Below we have three recommendations with detailed explanations.

1. Provide disability assistance to the individual, independent of living arrangements with a partner or spouse, roommates, or family caregivers. Remove the requirement to report joining or separating from a partner, spouse, or roommate. All of these are considered "family units".

The shelter rate will increase for the first time since 2007 moving the rate \$375 to \$500. An individual who receives a monthly disability benefit of \$1358.50 will soon receive \$1,483.50. This increase does not apply to people living in subsidized housing, only those individuals who are renting or paying for other housing or shelter costs. The numbers differ if they are in a unit with another person with a disability or if they are in a unit with another person without a disability. The individual monthly benefit should not be influenced by living arrangement.

In a partner or spousal relationship scenario where a person with a disability is receiving the benefit, but their partner doesn't, any income their partner earns could still be counted towards the benefits annual earnings exemption of \$18,000 per year (higher than \$15,000 for a single person). This could make the disabled person ineligible for benefits and their benefits could be cancelled.

Household or "unit" rates create situations that leave people vulnerable and dependent on their partner, or hiding a part of your life for fear of being found out. It means choosing whether to tell a government Ministry details about your personal life and relationship that could potentially backfire on you. For many people it means not taking the next step in their relationship to cohabiting or getting married for fear of changes in their benefits. If someone is in an abusive situation but dependent financially on the other person in their household it makes it harder to leave. And being disabled means not being able to simply get a job or work extra hours.

Living together in a relationship can be positive socially and financially, and it's something people who aren't on benefits can do without systemic repercussions.

We all deserve to be able to live with who we choose.

An individualized benefit would mean eligibility determination and funds are connected and provided to the person who applied for them, and would be attached solely to them and their dependents. This approach would provide people with dignity, independence, support, and safety.

2. Index the benefit rate to inflation using the Consumer Price Index to prevent people with disabilities from experiencing even deeper levels of poverty and suffering.

Statistics Canada has found that in March 2023, inflation rose 8.3% compared with 18 months prior. The basic necessities, food purchased from stores (10.6%) and shelter (6.1%), have increased most substantially. The CPI was up 5.2% as of February 2023.

For people with fixed incomes like disabilities or social assistance an already unfeasible monthly budget becomes even more dire. People report having their housing at risk or not being able to find any housing, and not eating for many days. Others forego medication or medical equipment so they don't starve or become homeless. For people living rurally, the nearest service or healthcare may be many kilometers away and they can't afford gas or transportation to get there. In worst case scenarios, people are dying. The unexpected, unaddressed increased costs are debilitating. Growing costs of food and shelter are connected with other consumer goods and have a ripple effect through people's lives.

The index link would mean that the benefit would be automatically adjusted on an annual basis. There is a lack of dignity in having to advocate for an increase to inflation in every budget, and the delay causes extended periods of time where people experience additional financial struggles.

Two provinces (Québec and New Brunswick) and the Yukon territory have indexed their social assistance programs to inflation with annual adjustments. These cases could provide a model to emulate for British Columbia.

3. End clawbacks of federal benefits and earned income. In particular, whatever new funds are delivered through the Canada Disability Benefit (CDB), existing provincial benefits must be protected. Allow the CDB to be supplementary to, and not in place of, provincial support. Allow people to receive and earn funds that will move them at least to or above the poverty line without any impact to benefits.

The current disability assistance is subject to a number of fund recoveries, or clawbacks, from the Ministry. Clawbacks come in to effect once income reaches the annual earnings exemption (\$15,000 for single, \$30,000 for couples where both are receiving disability benefits, and \$18,000 in a couple where one person is not receiving disability benefits).

In addition to money earned from working, unearned income includes federal benefits like Employment Insurance, any type of Canada Pension Plan, Old Age Security and related benefits, grants, loans, inheritance, and more. In British Columbia, each dollar of income over the

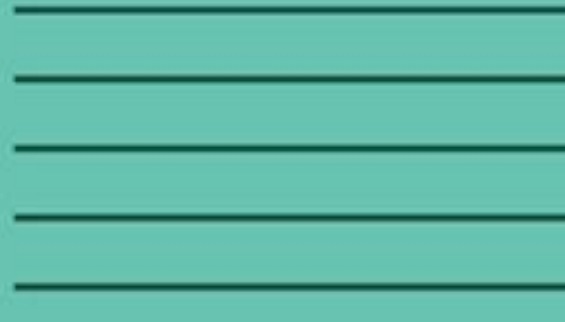
earnings exemption is deducted from a person's benefit. This leads to monthly benefits being reduced, or if monthly income (earned and unearned) consistently exceeds disability rates, being cut off. It's important to remember that the Person with Disabilities program also includes benefits like some healthcare and dental coverage, bus passes, and support for moving expenses. The fear of being kicked off is real and intense.

With the monthly benefit and an annual earnings exemption people are still left to live on an amount that is difficult to live on. This is particularly so because many people with disabilities may be unable or inconsistently able to work, and being disabled is more expensive.

End the clawbacks so people can receive the benefits and supports they're entitled to, and have incentive to work without fear of impacting their benefits. People have paid for the benefits, broadly with taxes and individually through Employment Insurance or Canada Pension Plan - Disability. Clawing it back is double-dipping funds people are entitled to. Not being allowed to "stack" or keep multiple benefits to at least the poverty line creates legislated poverty.



Disability Alliance BC
Recommendations to Update TogetherBC:
BC's Poverty Reduction Strategy
April 2023



April 28, 2023

Dear Honourable Minister Sheila Malcolmson,

Since 1977, Disability Alliance BC (DABC) has been a provincial cross-disability voice that advocates for the rights of people with disabilities. As a non-profit organization, we work to support people with all disabilities to live with dignity, independence, and as equal and full participants in the community. We are submitting our written recommendations to the Ministry of Social Development and Poverty Reduction (SDPR) for consideration in updating TogetherBC: BC's Poverty Reduction Strategy.

In conjunction with this recommendations document, DABC has recently engaged with SDPR as they seek feedback from community organizations on TogetherBC, including a meeting held in February 2023 between DABC and SDPR staff whereby we outlined many of the recommendations written here. DABC also hosted a small-group discussion between clients and members of our network, and SDPR in March 2023.

In addition to the recommendations included here, DABC, as a member of the BC Poverty Reduction Coalition (BCPRC), supports the BCPRC's [submission](#) to the TogetherBC review.

Our recommendations are based on direct feedback from our clients and our membership – most of whom are people with disabilities living on low income. We have witnessed how our clients and our community are affected by poverty. 24.7% of BC's population are people with disabilities,¹ and for many of them, they face two times higher poverty rates, worse housing outcomes and incur higher and additional expenses for basic needs of daily living than persons without disability.² A large majority (71%) of people accessing social assistance in BC are those who receive Disability Assistance (colloquially known as PWD). PWD also accounts for 88% of new clients under social assistance.³ DABC recognizes that Indigenous people with disabilities also face further compounding barriers to poverty reduction. DABC wishes to echo West Coast LEAF's [recommendation](#) in prioritizing Indigenous Poverty Reduction Measures, and in particular, wishes to highlight the recent report titled, [INCOME SUPPORTS AND INDIGENOUS PEOPLES IN B.C.: An Analysis of Gaps and Barriers](#) produced by the First Nations Leadership Council.

We recognize that none of these recommendations would be as compelling without the stories and lived experience of those who are living in poverty. With this in mind, we recommend that SDPR read this submission in conjunction with publicly shared experiences. For instance, we are inspired by the interviews collected in this [document](#), published by the Insufficient Art Project, among many others shared online, in the media, and in publications that place the lived experiences of people with disabilities at the centre.

Recommendations

- 1) Establish PWD as a separate program from Income Assistance**
- 2) Broaden criteria in the PWD application to reflect the wider implications of disability.**
- 3) Expand qualification for designated medical professionals to complete the PWD application**
- 4) Expand qualification to apply for PWD as a prescribed class.**
- 5) Increase the social assistance rates indexed to inflation as guaranteed in legislation**
- 6) Expand eligibility criteria of assistive devices coverage beyond PWD clients**
- 7) Expand Plan C extended healthcare coverage**
- 8) Reduce income-testing requirements for people on PWD**
- 9) Ease clawbacks on unearned income for people on PWD**

Rationale

1. Establish PWD as a separate program from Income Assistance

DABC believes that placing PWD within the social assistance system serves to reinforce discrimination and stigmatization towards people with disabilities.

Income Assistance (IA) is designed to provide short term assistance as a measure of “last resort” for those facing temporary problems. By having the PWD system nested within the IA system, it transfers that intention of

“temporary” assistance to those on PWD and fails to acknowledge the life-altering, often long-term nature of many disabilities that requires sustained and committed financial support that is needed in order to ensure meaningful participation of people with disabilities within the wider society and economy as a whole. This is especially evident in the routine monthly reporting that PWD recipients must provide in order to demonstrate that they are still within the financial eligibility requirements to receive assistance. This level of reporting and investigative nature by SDPR removes the agency of PWD recipients in obtaining financial freedom.

Having PWD as a separate system would enable people with disabilities to achieve an adequate basic income, with enhanced supplements, that would fully appreciate the long term financial and extended support required by many low income people with disabilities. This separate system would also positively acknowledge the rights and dignities of people with disabilities, and the responsibility of the BC Government to actively support their inclusion in our society.

DABC recommends that SDPR create a separate financial assistance and supports system which would provide a guaranteed income for all low income people with disabilities.

2. Broaden criteria in the PWD application to reflect the wider implications of disability.

The current PWD application process discourages people from accessing much needed support. Many PWD applicants have met with great difficulty and have often had to go through lengthy appeals before having their application approved.

The application process in and of itself can be a degrading experience for an individual, who may already feel demoralized due to public perception that income assistance is a “hand out”. To further go through the PWD application process where one needs to “prove” their disability in great detail in order to receive income, is an insult to many. Further, stigmatization towards people with disabilities, especially those with

“invisible” disabilities, is still very much prevalent in the healthcare sector, as evidenced by experiences shared from DABC clients.

In 2021, The Union of BC Indian Chiefs passed a [resolution](#) calling for the decolonization of the PWD application process, as the current application “does not adequately support, respect, and respond to the cultural, mental, and physical needs of Indigenous applicants, and instead reinforces cultural divisions and inequities between Indigenous peoples and non-Indigenous peoples.”⁴ DABC fully supports this resolution.

DABC recommends that SDPR expand the PWD application eligibility criteria that recognizes a more inclusive process for individuals to declare their disability.

3. Expand qualification for designated medical professionals to complete the PWD application

DABC has heard from many clients the difficulties in accessing a doctor or nurse practitioner available in their community to provide the assessment needed for section 2 of the PWD application. DABC has also heard from PWD applicants who either have recently moved to BC or, due to the nature of their disability are better placed to be treated by a specialist from outside the province, would benefit greatly by having their medical professional from outside of BC complete section 2 of the PWD application. It is in the best interest of PWD applicants to have a medical professional who knows their medical history well enough to adequately fill out the PWD application.

DABC recommends that SDPR include other classes of medical professionals and those practicing medicine or nursing in other provinces to support the PWD application.

4. Expand qualification to apply for PWD as a prescribed class.

DABC recommends that SDPR streamline the PWD application process by recognizing those who have already gone through a similar application, such as:

- Individuals who have been approved for disability assistance in another province and who have then moved to BC

- Recipients of the Disability Tax Credit

DABC argues that the above situations are similar to the current process for Canada Pension Plan – Disability (CPP-D) applicants, who may submit a streamlined application. As CPP-D and DTC applicants, as well individuals who have applied for disability assistance in other provinces, have already undertaken an assessment of disability with a medical professional through these application processes, a full PWD application is not needed.

DABC reiterates the need for SDPR to consider that the level of stress and pressure on individuals to “prove” their disability can be mitigated against through finding ways to streamline the process. Examining instances where individuals who have already gone through an application process for a different disability benefit should not need to go through the same validation process again.

5. Increase social assistance rates indexed to inflation as guaranteed in legislation

In our official [review](#) of the 2023 Budget, DABC stated our relief to see an increase in the shelter rate for people on social assistance; an increase that has been long overdue. The shelter rate, which hasn’t changed since 2007, will increase from \$375 per month to \$500 per month for single individuals in July 2023. For a single person on PWD, this means their rate will go from \$1,358 to \$1,483 per month.

Undoubtedly, rent prices have increased by much more than \$125 since 2007, so while we recognize that this shelter rate increase is a step in the right direction, it fails to meaningfully address systemic poverty in our province. DABC has heard from clients on PWD who continue to have to make impossible decisions between essentials like food, medication, rent, and utilities. Therefore, the current rate of PWD will continue to impact the quality of life, health and well being of low-income people with disabilities.

The poverty line for the majority of the province is roughly \$2100 per month for a single individual,⁵ and so this recent rate increase still will not meet the poverty line. While the [BC Basic Income Panel report](#) recommends that PWD be increased to match the poverty line,⁶ DABC further argues that people with disabilities will most certainly have additional disability-related

costs to incur on a regular basis, which goes beyond what a person without a disability would incur. Therefore, the current poverty line does not reflect the higher cost of living for people with disabilities. DABC highlights the BCPRC statement in their Blueprint for Justice: “we must not mistake Canada’s Market Basket Measure poverty line for a finish line. Shifting people marginally past a low threshold may achieve a statistical benchmark, but it does not signal that their fundamental human rights have been met. The poverty line is not a benchmark by which to measure the achievement of secure, full-time, unionized work with all the benefits workers and families deserve.”⁷

DABC recommends that SDPR increase the PWD rate, including indexed year on year for inflation and guaranteed within legislation. This will ensure PWD recipients peace of mind with their financial security rather than depend on the whim of whichever political party is in government at any time.

6. Expand eligibility criteria of assistive devices coverage beyond PWD clients

As noted above, there is an inherent cost in having a disability. Many people with disabilities have higher daily living expenses, such as extra healthcare costs including medical equipment, caregiving and home support, education and employment costs including assistive technology.

In the context of assistive devices, most provinces (except BC) have broad programs for access to assistive devices that are not tied to income, but focus instead on ability. Ontario’s Assistive Devices Program is not income tested; rather, it is available to any resident with a valid health card that has a long-term physical disability.⁸ In Quebec, assistive devices are available free of charge to anyone with a physical or intellectual disability or autism spectrum disorder that is covered by the provincial health plan.⁹ Alberta’s Aids to Daily Living Program provides a broad range of assistive devices to anyone with a long-term disability, chronic illness or terminal illness that has an Alberta health care card; it is a cost share program, but low income people do not pay the cost-sharing portion.¹⁰

In BC, most financial coverage available for adults for these devices is available for people on PWD only. Those that do not qualify for PWD can

apply for certain types of medical equipment and assistive devices only if they can establish that it is needed to meet a “direct and imminent life-threatening need”, and they have an extremely low income.¹¹ Many applicants fail to meet this strict criteria. People with disabilities who do not qualify for PWD are left to purchase expensive medical equipment and assistive devices on their own or to seek out help from non-profits and charities. In addition, many people who acquire a disability after retirement age are shocked to find there is no government financial assistance for assistive devices. This is not a minor issue. As noted by ARCH Disability Law Centre, assistive devices “can be the difference between independence, inclusion and participation in daily activities.”¹²

DABC recommends that SDPR expand eligibility beyond PWD clients to include other people with disabilities, including seniors and people who receive CPP-D.

7. Expand Plan C extended healthcare coverage

The BC Expert Panel on Basic Income recommends an approach of reducing “extended benefits coverage as income rises, using an approach similar to Fair Pharmacare”¹³. DABC further argues that in order for this approach to be successful, Pharmacare and MSP should be improved to expand coverage of prescriptions and treatments that are not currently covered under this system. In particular, DABC acknowledges that people living with mental health disabilities have felt ostracized from the PWD system as treatments such as counselling and psychiatric care are in large part not covered within the healthcare system.

Further, the current \$23 supplement for extended therapies¹ provided to PWD recipients is not effective in providing any financial relief as DABC has heard from clients that many practitioners often refuse to provide treatments to PWD clients as the administrative cost alone to apply for reimbursement from either MSP or the Ministry is more than \$23.

DABC recommends that SDPR collaborate with the Ministry of Health to increase and expand Plan C coverage, especially within the context of low income people with disabilities who are not on PWD, and who are often the

¹ Extended therapies includes: acupuncture, chiropractic, massage therapy, naturopathy, podiatry and physical therapy. It does not include any mental-health related therapies

most affected by this lack of coverage due to additional prescription and treatment costs.

8. Reduce income-testing requirements for people on PWD

The current PWD system disincentivizes recipients from actively seeking out opportunities that would improve their life situation (such as a full-time job, living with a partner/spouse, joining a rehabilitation facility for treatment, or travelling outside of the province) because of fear that their PWD income would be clawed back or revoked altogether. The level of restrictions currently imposed on PWD recipients in order to continue receiving assistance negatively affects the life choices of these recipients to such a degree that the Ministry has inadvertently established a class system in BC whereby low income people with disabilities are not afforded the same freedoms as everyone else.

DABC recommends that SDPR simplify the income testing process for PWD applicants, and that ongoing income testing to prove continued eligibility for assistance be structurally overhauled to heavily reduce the amount of reporting that currently PWD recipients are obligated to provide.

9. Ease clawbacks on unearned income for people on PWD

Currently, unearned, unexempted income received by PWD recipients are clawed back dollar for dollar from their monthly PWD income. The IA application process and the ongoing PWD monthly reporting process, has been given the term “welfare wall” which disincentivizes PWD recipients from earning too much, or accessing other benefits like CPP-D, lest they have their PWD pay clawed back or removed entirely. The BC Expert Panel on Basic Income suggests that clawbacks should be changed from 100% to 70%. DABC agrees that this would be a large improvement on the current treatment of unearned, unexempted income, however, we argue that CPP-D payments should not be clawed back at all.

For those who are no longer able to work, DABC is aware of the practice that SDPR takes in requiring PWD recipients to apply for CPP-D. Since CPP-D is taxable income and PWD income is not, the PWD client is worse

off financially when their PWD income is clawed back as they ultimately would need to pay taxes on the CPP-D income. This is discriminatory.

For those on PWD who are able to work, DABC believes that income replacement systems like employment insurance (EI) should be treated as earned income, not unearned income because workers contribute their employment earnings to EI through a deduction in their pay cheque. Everyone who pays EI premiums can rely on EI benefits being there when they need them, including PWD clients, however the difference is that PWD clients “are required to pursue and accept the other income or means of support,”¹⁴ meaning that they must accept EI benefits if they are eligible for them, but have no recourse to stop their PWD income from being clawed back. DABC believes this clawback of EI benefits is discriminatory against PWD clients, which hinders them from escaping the cycle of poverty. This argument was reflected in our [letter](#) to the Ministry in March 2022.

DABC recommends that SDPR exempt all unearned income.

Conclusion

DABC acknowledges the policy changes that SDPR has enacted over the years which have resulted in improved quality of life for low income people with disabilities in our province.¹⁵ Ultimately, we believe that further action is needed to provide stronger, more robust supports for people with disabilities living in poverty.

DABC welcomes open, sincere dialogue with SDPR and the Province in working towards meaningful poverty reduction measures for low income British Columbians with disabilities.

Sincerely,

A handwritten signature in blue ink that reads "Helaine Boyd". The signature is written in a cursive, flowing style.

Helaine Boyd
Executive Director
Disability Alliance BC

¹ Canadian Survey on Disability (2018). Persons with and without disabilities aged 15 years and over, by age group and sex, Canada, provinces and territories (Table 13-10-0374-0). Statistics Canada.

<https://doi.org/10.25318/1310037401-eng>

² Scott, C.W.M., Berrigan, P., Kneebone, R.D. et al. Disability Considerations for Measuring Poverty in Canada Using the Market Basket Measure. Soc Indic Res (2022). <https://doi.org/10.1007/s11205-022-02900-1>

³ <https://maytree.com/social-assistance-summaries/british-columbia/>

⁴ Page 42 of

https://d3n8a8pro7vhmx.cloudfront.net/ubcic/pages/132/attachments/original/1615323503/2021FebCC_FinalResolutions_Combined.pdf?1615323503

⁵ <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=1110006601>

⁶ Page 39 of https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

⁷ <https://www.bcpovertyreduction.ca/full-blueprint/economic-security>

⁸ <https://www.ontario.ca/page/assistive-devices-program>

⁹ <https://www.quebec.ca/en/health/health-system-and-services/assistive-devices-disabilities-andhandicaps/assistive-devices-programs-for-persons-with-a-physical-or-intellectual-disability-or-an-autismspectrum-disorder-asd/>

¹⁰ <https://www.alberta.ca/alberta-aids-to-daily-living.aspx>

¹¹ Employment and Assistance Regulation, BC Reg 263/2002, s. 76; Employment and Assistance for Persons with Disabilities Regulation, BC Reg 265/2002, s. 69.

¹² <https://archdisabilitylaw.ca/resource/arch-bulletin-on-covid-19-ontario-assistive-devices-program/>

¹³ BC Expert Panel on Basic Income. (2020). *Covering All the Basics: Reforms for a More Just Society*. Page 501.

https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

¹⁴ <https://www2.gov.bc.ca/gov/content/governments/policies-for-government/bcea-policy-and-procedure-manual/eligibility/pursuing-income>

¹⁵ <https://engage.gov.bc.ca/povertyreduction/actions-to-date/> and <https://disabilityalliancebc.org/community-update-province-announces-policy-changes-aimed-at-reducing-poverty/>

A Poverty Reduction Submission with Recommendations on Reducing Disability Poverty

This submission is made on behalf of the BC chapter of Disability Without Poverty, a national disability-led movement advocating for the Canada Disability Benefit and the end of disability poverty. Updated October 2022, the BC government's webpage on Diversity of Disability stated that 20.5% of British Columbians between the ages of 15 and 64 live with a disability. They are disproportionately living in poverty. The Service Plan report in February 2023 states, around 118,000 people received monthly Person With Disabilities benefits (disability assistance or disability benefit) from the Ministry of Social Development and Poverty Reduction. That number does not include the 42,000 dependant children. The current provincial benefit is well below provincial and regional poverty lines. Reducing poverty is good socially and economically. We recommend actions that would reduce financial inequities and positively impact people with disabilities. With the recent release of the BC Budget, we see marginal improvements, but not nearly enough to impact the systemic poverty in BC for many people with disabilities. Below we have three recommendations with detailed explanations.

1. Provide disability assistance to the individual, independent of living arrangements with a partner or spouse, roommates, or family caregivers. Remove the requirement to report joining or separating from a partner, spouse, or roommate. All of these are considered "family units".

The shelter rate will increase for the first time since 2007 moving the rate \$375 to \$500. An individual who receives a monthly disability benefit of \$1358.50 will soon receive \$1,483.50. This increase does not apply to people living in subsidized housing, only those individuals who are renting or paying for other housing or shelter costs. The numbers differ if they are in a unit with another person with a disability or if they are in a unit with another person without a disability. The individual monthly benefit should not be influenced by living arrangement.

In a partner or spousal relationship scenario where a person with a disability is receiving the benefit, but their partner doesn't, any income their partner earns could still be counted towards the benefits annual earnings exemption of \$18,000 per year (higher than \$15,000 for a single person). This could make the disabled person ineligible for benefits and their benefits could be cancelled.

Household or "unit" rates create situations that leave people vulnerable and dependent on their partner, or hiding a part of your life for fear of being found out. It means choosing whether to tell a government Ministry details about your personal life and relationship that could potentially backfire on you. For many people it means not taking the next step in their relationship to cohabiting or getting married for fear of changes in their benefits. If someone is in an abusive situation but dependent financially on the other person in their household it makes it harder to leave. And being disabled means not being able to simply get a job or work extra hours.

Living together in a relationship can be positive socially and financially, and it's something people who aren't on benefits can do without systemic repercussions.

We all deserve to be able to live with who we choose.

An individualized benefit would mean eligibility determination and funds are connected and provided to the person who applied for them, and would be attached solely to them and their dependents. This approach would provide people with dignity, independence, support, and safety.

2. Index the benefit rate to inflation using the Consumer Price Index to prevent people with disabilities from experiencing even deeper levels of poverty and suffering.

Statistics Canada has found that in March 2023, inflation rose 8.3% compared with 18 months prior. The basic necessities, food purchased from stores (10.6%) and shelter (6.1%), have increased most substantially. The CPI was up 5.2% as of February 2023.

For people with fixed incomes like disabilities or social assistance an already unfeasible monthly budget becomes even more dire. People report having their housing at risk or not being able to find any housing, and not eating for many days. Others forego medication or medical equipment so they don't starve or become homeless. For people living rurally, the nearest service or healthcare may be many kilometers away and they can't afford gas or transportation to get there. In worst case scenarios, people are dying. The unexpected, unaddressed increased costs are debilitating. Growing costs of food and shelter are connected with other consumer goods and have a ripple effect through people's lives.

The index link would mean that the benefit would be automatically adjusted on an annual basis. There is a lack of dignity in having to advocate for an increase to inflation in every budget, and the delay causes extended periods of time where people experience additional financial struggles.

Two provinces (Québec and New Brunswick) and the Yukon territory have indexed their social assistance programs to inflation with annual adjustments. These cases could provide a model to emulate for British Columbia.

3. End clawbacks of federal benefits and earned income. In particular, whatever new funds are delivered through the Canada Disability Benefit (CDB), existing provincial benefits must be protected. Allow the CDB to be supplementary to, and not in place of, provincial support. Allow people to receive and earn funds that will move them at least to or above the poverty line without any impact to benefits.

The current disability assistance is subject to a number of fund recoveries, or clawbacks, from the Ministry. Clawbacks come in to effect once income reaches the annual earnings exemption (\$15,000 for single, \$30,000 for couples where both are receiving disability benefits, and \$18,000 in a couple where one person is not receiving disability benefits).

In addition to money earned from working, unearned income includes federal benefits like Employment Insurance, any type of Canada Pension Plan, Old Age Security and related benefits, grants, loans, inheritance, and more. In British Columbia, each dollar of income over the

earnings exemption is deducted from a person's benefit. This leads to monthly benefits being reduced, or if monthly income (earned and unearned) consistently exceeds disability rates, being cut off. It's important to remember that the Person with Disabilities program also includes benefits like some healthcare and dental coverage, bus passes, and support for moving expenses. The fear of being kicked off is real and intense.

With the monthly benefit and an annual earnings exemption people are still left to live on an amount that is difficult to live on. This is particularly so because many people with disabilities may be unable or inconsistently able to work, and being disabled is more expensive.

End the clawbacks so people can receive the benefits and supports they're entitled to, and have incentive to work without fear of impacting their benefits. People have paid for the benefits, broadly with taxes and individually through Employment Insurance or Canada Pension Plan - Disability. Clawing it back is double-dipping funds people are entitled to. Not being allowed to "stack" or keep multiple benefits to at least the poverty line creates legislated poverty.



Recommendations for renewal of the TogetherBC Poverty Reduction Strategy

March 20, 2023

Who we are

Ecotrust Canada is a national charity with a 28-year history. We work primarily with rural, remote, and Indigenous communities toward building an economy that provides for a healthy and resilient natural environment; sustainable and abundant energy, food, and housing; prosperous and meaningful livelihoods; and vibrant cultures and inclusive societies. We call this approach *building an economy that provides for life*.

Our Community Energy Program's vision is one of **healthy, resilient homes, and energy security for all** — a society where nobody has to choose between heating their home and feeding their family. Over the last six years, we have been hard at work with community partners, proving **home energy retrofit projects** on the ground, and researching policies that can help make energy access more affordable and equitable. These solutions are more important than ever, as increases in the cost of living are making it harder for people to make ends meet.

We believe that everyone has a right to clean, affordable energy, and climate resilient homes. However, we cannot achieve these goals without bold action and leadership from the provincial government.

Energy poverty in British Columbia

There are at least **250,000 households** in British Columbia that experience a lack of affordable access to basic energy services like heating, lighting, and cooking as a daily reality. These households are spending more than twice what the average British Columbian spends on energy, as a percentage of income — the generally agreed-upon threshold for energy poverty. The consequences of energy poverty can be severe, including poorer health outcomes and heartbreaking choices — like having to choose between heating one's home and feeding one's family.

As inflation raises the cost of everything, from food to housing to energy bills, the impacts of energy poverty have only become more striking, and the links to housing adequacy and affordability are made all the clearer. Fortunately, the policies best suited to tackle energy poverty also address a number of other urgent priorities — including the rejuvenation of BC's housing stock, reducing carbon emissions, and making our homes and buildings more resilient to a changing climate.

Vancouver office

West 8th Avenue, Suite #300,
Vancouver, BC
V5Y 1N3 | 604.682.4141

Prince Rupert office

Suite 425-309 2nd Ave W
Prince Rupert, BC
V8J 3T1 | 250.624.4191

Impacts of energy poverty

A lack of access to basic energy services can have profound impacts on human health and well-being. High energy costs exacerbate the social distress and impact of poverty in low-income communities, while inadequate heating and/or cooling systems lead to **negative health and social impacts** from lower air quality, overheating, underheating, and mould.

Through our community work, we have found that some residents do not heat their homes at all because they cannot afford heating fuel, and many families experience higher rates of asthma, cardiovascular, and mould-related illnesses as a result of **vastly inadequate** heating and ventilation systems. Overheating in homes can also pose a significant health risk, particularly for seniors and persons with reduced mobility that are not always able to access cooling centres. Households that experience energy insecurity **consistently report** poorer overall health, both physical and mental.

Households that experience energy poverty also typically have less discretionary income that might be used to improve energy efficiency or address health issues in their homes. The impacts of energy-inefficient housing are especially pronounced in low- and middle-income households, where limited funds for upgrades and higher energy bills create a vicious circle that perpetuates the cycle of energy poverty.

It has been **conclusively demonstrated** that underserved and equity-deserving communities including visible minorities and recent immigrants are impacted by energy poverty more often than other British Columbians. In addition, rural and Indigenous communities can face higher rates of energy poverty, with an electricity cost burden that is often two to three times the provincial average. With a greater share of incomes flowing to utilities based outside the community, energy poverty can compound economic development challenges in rural areas.

Current policy landscape in BC

Efforts to relieve energy poverty in BC have been limited in their effectiveness to date, largely because the decision-making bodies working on energy issues do not have a mandate to alleviate poverty or consider equity impacts. Neither BC utilities nor the Ministry of Energy, Mines, and Low Carbon Innovation has the breadth of experience designing equity-focused public policy that the Ministry of Social Development and Poverty Reduction does. In our extensive consultations with jurisdictions across North America, we have heard time and again that programs designed to reduce poverty are best administered by government agencies, not by utilities.

A credible long-term strategy for addressing energy poverty would include two major components:

1. A plan to improve energy efficiency and reduce consumption across households facing energy poverty.
2. Direct financial support for households facing a high energy cost burden.

Vancouver office

West 8th Avenue, Suite #300,
Vancouver, BC
V5Y 1N3 | 604.682.4141

Prince Rupert office

Suite 425-309 2nd Ave W
Prince Rupert, BC
V8J 3T1 | 250.624.4191



BC has fallen behind other jurisdictions including Ontario, New Brunswick, Nova Scotia, and Prince Edward Island on both policy areas. Several Maritime provinces are now offering innovative, no-cost programs that provide lower-income households with heat pumps. Meanwhile, other provinces including Ontario have introduced electricity bill assistance programs, which complement other forms of income assistance and ensure that access to basic energy services like heating, cooling, and lighting are protected as human rights. Our recommendations below outline how BC can get back on track with TogetherBC as a foundational guiding document for addressing energy poverty.

Recommendations to Government

Based on our extensive experience working on energy justice policy, Ecotrust Canada proposes the following recommendations for innovative, cross-ministry policy that will have the potential to significantly reduce energy cost burdens for low- and middle-income households. These recommendations are broadly aligned with our [May 2022 submission](#) to the BC Government's Energy Affordability Working Group, along with four other organizations working on the front lines of energy poverty.

1. Set a target to eliminate energy poverty in BC as a key pillar of TogetherBC, and as part of a justice-based housing renewal strategy

The BC Government should develop a long-term strategy to ensure that every home and building in BC is healthy, low-carbon, and climate resilient. In keeping with principles of justice and equity, public funds and programs should be primarily directed to residents with the least ability to pay for upgrades to their homes, with higher-income households targeted through regulations such as the forthcoming Alterations Code for Existing Buildings.

In conjunction with this sector-wide strategy, we call on the BC Government to **develop a clear plan and target to eliminate energy poverty in BC within 10 years as part of TogetherBC**. This effort will require a step change in ambition, but we believe that this vision is achievable. The measures required to achieve it will also support significant progress toward other priorities including housing renewal, economic recovery, and climate action.

2. Provide no-cost retrofit programs to low- and moderate-income households, to prepare them for a changing climate and rising energy costs

Extreme heat and weather induced by climate change is already killing British Columbians, as the June 2021 heat dome and subsequent [Extreme Heat Death Review Panel Report](#) demonstrated. For too long, we have subsidized primarily wealthy households that *already* have the resources to prepare for these dangers. Rebate and incentive programs for home energy retrofits are disproportionately accessed by those who need them the least, while lower-income households *cannot afford* to make their homes more climate resilient, or make the energy efficiency improvements that would lower their utility bills.

Vancouver office

West 8th Avenue, Suite #300,
Vancouver, BC
V5Y 1N3 | 604.682.4141

Prince Rupert office

Suite 425-309 2nd Ave W
Prince Rupert, BC
V8J 3T1 | 250.624.4191



The creation of an **income-qualified retrofit program** in 2021 was an important first step. As part of a cross-ministry effort to achieve the goals of TogetherBC, we now call for the BC Government to **expand this program and provide full cost coverage** for retrofitting and electrifying the homes of the 272,000 BC households that are experiencing energy poverty. Such a program should focus on deploying **electric heat pumps**, which have the potential to significantly improve indoor air quality and provide much-needed cooling during heat waves, in addition to lowering energy bills.

BC is already lagging behind other jurisdictions in this regard, and provinces such as **Nova Scotia** and **Prince Edward Island** have introduced programs providing a free heat pump to residents meeting an income-qualifying threshold. Such a program could cost around \$100 million per year — significantly less than the **\$400 million** spent on ICBC rebate cheques in 2022, but with vastly more impactful results. The cost of inaction is much greater. Climate change-induced storms in 2021 caused **\$7.5 billion** in damage to BC's infrastructure, and the cost of dealing with the health impacts brought on by extreme heat could push our already fragile **\$27-billion** healthcare system to the breaking point.

This moment presents an opportunity to begin addressing many of the challenges facing British Columbians, from energy poverty to the climate crisis to the housing crisis. By bringing all homes up to modern energy and health standards, we could lower utility bills, improve the quality of the housing stock, and prepare for a changing climate by making our indoor spaces more comfortable and healthier. It is rare that policymakers have this kind of opportunity to address so many urgent social issues in a cost-effective and holistic way.

3. Introduce an income-qualified energy bill assistance program

BC currently has no program providing direct energy bill support for income-qualifying households, putting it behind many jurisdictions including Ontario, New Brunswick, Nova Scotia, and California. Compounding this problem, BC's only emergency energy bill relief program, the Customer Crisis Fund, has an uncertain future after nearly being cancelled in 2020. This could leave hundreds of thousands of low- and moderate-income British Columbians with nowhere to turn if they fall behind on paying their utility bills.

The BC NDP campaigned in 2017 on a promise to introduce a **"lifeline rate" for electricity**, which would have reduced the burden on households that face chronic hardship in paying their energy bills due to lower incomes, poor quality housing, and an inability to afford the most energy-efficient technologies in their homes. Unfortunately, the BC Utilities Commission has not allowed this policy to advance, as the *Utilities Commission Act* does not provide any mandate for the Commission on equity or climate justice.

Now, the conversation around basic access to electricity is more relevant than ever. Utility bills are on the rise, and BC Hydro rates are expected to increase significantly over the coming years. Our **research of other jurisdictions'** policies suggests that **BC could offset this impact by introducing an energy**

Vancouver office
West 8th Avenue, Suite #300,
Vancouver, BC
V5Y 1N3 | 604.682.4141

Prince Rupert office
Suite 425-309 2nd Ave W
Prince Rupert, BC
V8J 3T1 | 250.624.4191



bill assistance program at the provincial level. This program would protect access to essential energy services for heating, cooling, lighting, and cooking for the most vulnerable households in BC.

As a key deliverable in implementing a goal to eliminate energy poverty, the BC Government should introduce a permanent, ongoing monthly bill subsidy for qualifying households, considering factors such as household income, and energy demands that cannot easily be reduced. Such a program could be administered alongside, and delivered in conjunction with, existing forms of income assistance.

4. Ban disconnections and implement arrears forgiveness programs

Utility disconnection policies exacerbate energy poverty and are a human rights issue. Currently, winter disconnections are deferred by BC Hydro for most of the province, but are common during the summer months. In the Lower Mainland and on Vancouver Island, winter disconnections still take place if the weather is warmer than 0 degrees Celsius.

These policies ignore the realities of energy poverty, including the chronic inability to pay bills, and accounts in chronic arrears. Utility policies do not acknowledge basic energy services like heat and light as human rights. We call on the BC Government to **protect basic access to energy by banning disconnections** altogether – and for lower-income customers at a minimum.

We also recommend implementing arrears forgiveness programs similar to those implemented by utilities in **Colorado and Vermont**. These programs allow participants the opportunity to escape energy poverty by giving them a fresh start on their energy bills. We believe that arrearage forgiveness programs should be considered as an important component of an effective energy affordability framework.

Conclusion

We strongly encourage Government to build on existing momentum and adopt a vision. Our recommendations for the TogetherBC plan include setting a clear and ambitious target to eliminate energy poverty in BC within the next ten years. Paramount to achieving this goal will be the prioritization of cross-ministry policies, including enhancement of income-qualified retrofit programming, and the development of an ongoing bill assistance program for those that are not yet ready or able to complete home energy retrofits.

We look forward to collaborating with the BC Government across all relevant ministries, to make this ambitious, yet achievable vision a reality — advancing energy justice across British Columbia.

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West 8th Avenue, Suite #300,
Vancouver, BC
V5Y 1N3 | 604.682.4141

Prince Rupert office
Suite 425-309 2nd Ave W
Prince Rupert, BC
V8J 3T1 | 250.624.4191

What programs and services are having the biggest impact in addressing poverty or the effects of poverty and why? (i.e. like tax benefits, affordable housing, food access services, etc.)?

- Food access supports (Quest Food Exchange, any free food services, Carnegie Centre daily low-cost food, Club 44 (Evelyne Saller Centre), The Gathering Place, Greater Vancouver Food Bank, Port Moody Food Bank, First United Church, Sikh Temples food programs) - having access to affordable and nutritional food at reasonable prices especially during the current rising costs of food.
- Tax breaks for low income families, seniors, singles
- Disability rates (increasing the rates that you can earn without having your disability clawed back)
- Nutritional Supplements through the BC Ministry of Poverty Reduction

What makes these programs or services most helpful?

- GVFB makes it more accessible to access more locations, and they also bring in food from local food producers creating a sense of relatability and understanding of where the food originated from.
- Astoria Gardens (run in collaboration by the DTES Neighbourhood House) gives food back into the community that was grown by the community... having access to nutritional food options allows people to be healthier overall and creates less burden on the medical system.

How are people learning about these programs or services?

- Food Services (Word of mouth / the internet / other organizations / low-income advocates & social workers)
- Tax Breaks & disability Rates (facebook, bus ads, word of mouth, social workers, referrals from hospital, Kettle Society, Club 44, Carnegie Outreach, Smoke Signals, Poverty Reduction Advocates), Disability Alliance BC etc.

How are people accessing these programs or services? Are there barriers to access?

- Word of mouth / referral from other supportive organizations / Advocates

Are there ways to improve how to learn about, or access, these programs or services?

- Better online information that's condensed into one location / combined info into one book and keeping it updated on a regular basis / Low-income voicemail service (was in place previously a few years ago but isn't around anymore) / more community fairs & events / homeless action week / hosting engagements that create dialog with community members and residents alike to discuss these topics in greater length *(if you're ever interested in collaborating on an engagement related to poverty reduction strategies, feel free to reach out. I have connections with community members here in the DTES with direct lived experience of living in poverty and could potentially support the coordination of an engagement centered around this).*



INTRODUCTION

Our Connection to People in Poverty

Family Services of Greater Vancouver has been supporting people in crisis since 1928. Over the decades, our programs and services have evolved to meet changing community needs, but compassionate supports for people in poverty has always been a cornerstone of our work. In recent years, our focus has been on crisis intervention, counselling, and community education.

In any given year, **more than 10,000 people from across the Lower Mainland access our programs and services.** Many of our clients are impacted by poverty and trauma, among other complex issues ranging from mental health or substance use challenges to significant experiences of marginalization for their race, gender, sexuality, or disability. Many don't understand or aren't familiar with government benefits or programs, are newcomers struggling to navigate new systems in a second language, or simply can't make ends meet in this high-inflation, high cost-of-living environment.

Whether our clients come to us in a moment of acute crisis, as part of a government referral for counselling, for support with their finances, or looking for a hot meal and a place to shower, **Family Services of Greater Vancouver is here to walk alongside them on their unique journey.**

Our Specialization

Across our portfolio of victim services, trauma counselling, youth services, and specialized family supports, **we work on the highest-risk cases** – high risk for repeated or escalated violence, exploitation, re-traumatization, family separation, and more. **Our staff are highly specialized and take trauma-informed approaches to heart – engaging with each client as an individual with their own history, and their own future goals.**

Our Financial Empowerment program provides neutral financial coaching services. Our commitment is to the client, with no affiliation to financial institutions. Like other programs at FSGV, our financial coaches operate from a trauma-informed, culturally sensitive lens, getting to know clients as individuals with individual needs and goals.

THE ROLE OF NON-PROFITS IN POVERTY REDUCTION

There were 644,990 people living in poverty in BC in 2020. Of that, 35,230 were children under six. The poverty rate across all ages is 13.2%. While these numbers are not new to government, poverty remains a sticky challenge – and with the cost-of-living crisis bringing more people to FSGV programs like Financial Empowerment, many more individuals and families are nearing a precipice, even if they do not fall under the poverty line.

The Province of BC has made significant strides to reduce poverty rates, and we want to acknowledge these efforts. We see the direct benefit to our clients as benefits increase and become easier to navigate, and barriers to programs and services are meaningfully addressed. We are hopeful that, through a model built on partnership with the non-profit sector, British Columbia can make a lasting difference to support our most vulnerable community members.

The Financial Resilience Institute measures the financial resilience of Canadian households: their ability to get through financial hardship, stressors and shocks as a result of unplanned life events. In their 2022 Low-Income Study, they write “in June 2022, 73% of low-income Canadians were ‘Extremely Vulnerable’ or ‘Financially Vulnerable’ compared to 65% in June 2021.” FRI measures low-income at \$25,000 for a single person and \$50,000 for a household.

For non-profits like Family Services of Greater Vancouver – that serve a range of clients who currently fall under the poverty line or who are at risk given the high cost of living along with other life challenges – we see how complex vulnerabilities can lead to entrenched poverty. We also see how poverty, in combination with significant stresses like violence, trauma, addiction, and homelessness, result in barriers to accessing supports.

If adequately resourced, non-profits are well positioned to address poverty and its root causes. We understand the existing service ecosystem and advocate to fill gaps in the continuum of care, particularly in identifying vulnerability early and helping to connect people to appropriate supports.

Non-profits are Trust Builders

When clients share that they have been disappointed in the systems in their lives, we listen. Often, clients tell us that they don't feel seen, heard, or supported. Some have had negative experiences with institutions like banks, healthcare providers, police, housing providers, or government services.

Non-profits like FSGV build trust with clients through a client-centered approach. It means we get to know clients as individuals, hear their concerns, and work together with them to achieve their goals. It takes time. It takes compassion. But it works.

Beyond public funding, non-profits rely on the philanthropic and corporate community to deliver these client-centered services because we believe in the outcomes.

- In our **Financial Empowerment** program, post-participation evaluations regularly include client feedback about feeling supported. Of those accessing Financial Empowerment services 94% report being satisfied, while 96% of clients report improvement in their situation or behaviour.

“Thao was very supportive and made us feel safe speaking about our financial situation.”

—Financial Empowerment client

- Across our **Trauma Counselling** programs, we often provide longer-term supports than we are contractually obligated to deliver; this approach is significantly more trauma-informed, providing clients more than simple coping skills. Why? We see first-hand how our investment allows for true healing, in turn empowering clients to invest in their well-being and health outcomes.
- For victims and survivors of crime who choose to engage in the criminal justice system, some investigation, trial, and sentencing processes can take 4-5 years. Our **Victim Services** support workers will carry files and provide victim support throughout this journey.

Non-profits are Service Connectors

There is a tax on time when you are in poverty. Some clients in our Financial Empowerment program juggle multiple jobs to support their families. Accessing services often requires multiple support workers, applications, and visits to locations across the region to find discounted food, childcare, or housing. It is emotionally exhausting to have to “prove you’re poor” or be turned away from support when you don’t meet requirements. It takes time to do research, requires access to the internet or a phone, and the ability to travel to and attend office-hours appointment.

Again, non-profits have a significant role in the support services ecosystem. Programs like Financial Empowerment don’t require referral or income verification. Our victim support workers, counsellors, youth workers, and resource workers are familiar with the web of supports available to clients. We walk alongside people so they don’t need to navigate this difficult time in their lives on their own.

Non-profits rely on the philanthropic and corporate community to deliver these wrap-around services because they are proven and we believe in the outcomes.

- At **Directions Youth Services Drop-In Centre**, the only 24/7/365 resource of its kind, precariously or unhoused youth ages 13-24 can drop by for a meal. To help youth learn about nutrition and develop grocery buying skills, the Pantry Program gives youth a chance to shop at the Centre with points
- To ensure our **Financial Empowerment** clients can access their appointments, we distribute transit tickets. To ensure they can put food on the table that night, we provide grocery gift cards
- When **victims of trauma** can’t access in person counselling, we provide laptops so they can continue their sessions from home. If they require childcare, we will provide a childminder.

FINANCIAL EMPOWERMENT

Giving British Columbians the Skills to Succeed

The Financial Resilience Institute 2022 report, *The Financial Vulnerability of Low-Income Canadians: A Rising Tide*, found that 68% of households with low incomes faced barriers impacting their ability to earn money, while 64% faced significant financial hardship related to housing affordability, unmanageable debt levels, and the cost of food.

Financial literacy is undertaught, and marginalized individuals encounter personal, institutional, and systemic barriers that prevent them from accessing the financial products, services, and advice they need to build their financial wellbeing. As a result, many low-income people cannot achieve financial stability and security, and are unable to pursue basic life goals for themselves and their families.

Family Services of Greater Vancouver plays a crucial frontline role in the solution to this systemic issue. As Prosper Canada's sole Financial Champion in BC, we provide free, innovative financial literacy programs. Further, FSGV builds capacity for financial literacy across the province. To date, we have taught 600+ frontline staff basic financial literacy support skills so they can better address the financial challenges that impact their clients.

With an investment in Financial Empowerment across the province, we can expand the Financial Empowerment model across the province, through:

1. Province-wide training

Hire financial empowerment experts to travel across the province and train other non-profits and community service providers – with a focus on training frontline staff, including those in rural and under-served communities – to support clients to develop financial resilience.

2. Expanded workshop offerings and coaching

Build core programming capacity for personalized 1:1 coaching and accessible community-based and virtual workshops. While FSGV currently offers support in five languages, financial literacy information in other languages will reduce barriers and add to our culturally informed service lens.

Family Services of Greater Vancouver is poised to expand financial literacy supports across the province. Not only does the agency have experience providing province-wide service through the Family Services Employee Assistance Program (FSEAP), we are connected to and trusted among vulnerable populations and other partners across the social services and adjacent sectors.

RECOMMENDATIONS

FSGV has a long-standing connection to people in poverty. We specialize in supporting the most vulnerable populations, including those entrenched in or at high risk for poverty – through trauma-informed crisis intervention, counselling, and education. **As trust builders and service connectors, we recommend the following:**

Sustainably fund non-profit partners

- Recognize and adequately invest in stabilization supports along the continuum of care, including victim support work, harm reduction, shelter spaces, and wrap-around services.
- Invest in training opportunities for workers across the social services.
- Ensure direct and contracted government employees are paid a living wage that allows them to meet their basic needs, remain in the sector, live in the region, properly support their children, and avoid chronic financial stress.
- Adequately fund administration, technology, and marketing for non-profits. To sustainably support people in poverty, the non-profits engaged on the front line must be able to pay rent, recruit and retain staff, meet their goals with the benefits of working technology, and reach their target clients through marketing and advertising.

Expand Financial Empowerment

- Expand financial literacy workshops and coaching by working with non-profits to deliver province-wide trauma-informed training to service providers.
- Incentivize savings for low-income earners, including pre-crisis interventions like the facilitation of building emergency savings and other financial resilience strategies to support income mobility.
- Improve the accessibility of benefits by harmonizing the Federal/Provincial qualification criteria for benefits
- Review and amend policies that claw back benefits before recipients have stabilized their income and savings.
- Develop a financial inclusion model that ensures people in poverty can gain access to financial products and services that meet their needs, including transactions, payments, savings, credit and insurance.

Increase Access to Supports

- Empower community-based service providers to deliver wrap-around supports so that people in poverty don't need to service-hop to receive basic resources.
- Co-locate services and equitably invest in resource support workers, so that clients can establish trusted, long-term points of contact.
- Address the solutions visibility challenge through the recently announced Digital Plan. Beyond the government solution, invest in non-profits' ability to likewise adapt.
- Invest in no-to-low-cost counselling for people in poverty or financial vulnerability. Experience with poverty is traumatic and victims deserve to access long-term support.
- Review and amend barriers to programs such as AYA, PWD, or employment supports in consultation with people with lived and living experience, as well as community organizations.

Build a durable and sustainable foundation of affordable housing throughout BC

- Connect the housing strategy to immigration targets.
- Create a plan for the most at-risk populations, such as precariously or unhoused youth, high-risk victims of violence, and people suffering from complex trauma.
- Provide funding to service providers that provide housing and wrap-around support to these populations.
- Develop targeted initiatives for those in deep poverty or over-represented in data.
- Anticipate family housing needs before families are separated; provide housing that meets ministry requirements for family reunification.

Increase Disability Assistance Rate in BC

Dear BC government officials,

As a person living with severe disability in Metro Vancouver, I am writing to you today to urge you to increase the current meager, low rate of disability assistance in our province to a livable living rate that is tied with high inflation and interest rates.

I suffer from severe mental illness through no fault of my own. As a designated Person With Disability, I struggle to have nutritious food to eat, and difficulty with high transportation costs. I take transit. That is still expensive with increased fares. I can not afford therapy, as the going average rate of \$150 before tax for a 50 minute counseling session is out of reach for our most vulnerable population.

There are many factors that contribute to poverty in our community today, and *people with disabilities are among the groups that are most affected*. We face barriers to employment and often rely on government support to meet our basic needs. The high cost of living in Vancouver only exacerbates these challenges, leaving many of us struggling to make ends meet.

The events since 2019, such as the COVID-19 pandemic, inflation, and climate change, have only further impacted people in poverty in our community. The pandemic has led to job losses and increased expenses for many, while inflation has made it even harder to afford basic necessities. Climate change has also affected us, as extreme weather events and natural disasters can be especially devastating for people with disabilities.

While I appreciate the changes that have been made since the 2017/2018 engagement process, such as annual increases to the minimum wage and increases to income assistance and disability assistance rates, it is clear that more needs to be done. Of these changes, increasing disability assistance rates has had the biggest impact on people with disabilities, as it allows us to better afford the cost of living and the additional expenses that come with having a disability.

Additional changes that could have the biggest impact on addressing poverty include increasing affordable housing measures, expanding access to mental health services, and providing more support for people with disabilities to find and maintain employment. It is important to prioritize these changes as they directly impact the quality of life of individuals and families in our community.

In order to help people learn about and access the supports that are available for them, it is crucial to increase outreach efforts and provide accessible information about available resources. This could include creating an online hub that compiles all the necessary information and resources in one place, or holding regular information sessions and workshops for those who may not have access to technology.

My top three priorities for addressing poverty over the next five years would be to increase disability assistance rates to a livable living rate, increase affordable housing measures, and expand access to mental health services. Over the longer term, it is important to address the root causes of poverty, such as systemic inequalities and ableism.

I urge you to take action on these issues and make the necessary changes to support individuals and families in our community who are living in poverty. Thank you for your consideration.

Sincerely,
T. LE



**Submission to the Review of the
British Columbia Poverty Reduction Strategy**

April 2023

First Call Child and Youth Advocacy Society

328 – 3381 Cambie Street, Vancouver, BC V5Z 4R3

Phone: 604-288-8102

info@firstcallbc.org

www.firstcallbc.org

About First Call

First Call Child and Youth Advocacy Society is a registered non-profit society based in British Columbia. First Call's advocacy is informed by the cross-sectoral expertise and province-wide reach of our diverse network of affiliates who have united their voices to put children and youth first in British Columbia through public education, community mobilization, and public policy advocacy.

Network affiliates work together to make sure all BC's children and youth benefit from the 4 Keys to Success for Children and Youth:

1. A strong commitment to early childhood development
2. Support in transitions from childhood to youth and adulthood
3. Increased economic equality
4. Safe and caring communities

First Call publishes the annual BC Child Poverty Report Card in cooperation with Campaign 2000, the national campaign to end child and family poverty and SPARC BC. We include a summary of some of the evidence in the 2022 Report Card here:

- In 2020, the year this report covers, there were 116,500 (13.3%) children and youth living in poor households, with many living in deep poverty.
- The poverty rate for BC children in lone-parent families was 38.3%. 59% of BC's poor children in 2020 lived in lone-parent families. 80% of BC lone parents were women in 2020.
- Many BC families had annual incomes that were \$11,000 to \$12,000 below the Census Family Low Income Measure After Tax (CFLIM-AT) poverty line.
- The child poverty rate on 59 BC First Nations reserves in 2020 was 29.2% with a higher rate on rural reserves (33.9%) than on urban reserves (25.2%).
- Many of the regional districts with the highest child poverty rates were located in coastal areas, particularly along the north and central coast areas.
- Approximately 85% of the poor children in B.C. live in the province's 25 urban areas. However, children living outside urban areas have a 17.2% poverty rate, higher than the provincial child poverty rate of 13.3%.
- Thanks to government income transfers, 153,630 BC children were kept out of poverty in 2020.
- 94% of BC families with children received some sort of government pandemic benefit in 2020.
- The majority of poor children in BC live with parents in paid work, either full or part time. Low wages and precarious work are important causes of family poverty.
- Even with the temporary pandemic supplements in federal and provincial benefits in 2020, income assistance rates remained below the poverty line, with severe consequences for the health of parents and children depending on this income. A couple with two children on temporary assistance in 2020 had a total income that was just 77% of the poverty line, leaving a poverty gap of \$11,208.
- The income of B.C.'s richest 10% of families with children took home 24.5% of the income pie in 2020, compared to the 1.6% shared by the poorest 10% of families.

The 2022 BC Child Poverty Report Card, maps and other materials are posted here: <http://www.firstcallbc.org>

Recommendations

Recommendation 1: Accountability

First Call is focused on the rights and well-being of B.C.'s children and youth. We look to our government to live up to our commitment as a signatory to the UN Convention on the Rights of the Child to uphold their rights to special protections, education, health, child care and family supports, and to have their best interests taken into account in all matters affecting them. Article 27 of the Convention requires us to “recognize the right of every child to a standard of living adequate for their physical, mental, spiritual, moral and social development.” It also requires us to “take appropriate measures to assist parents and others responsible for the child to implement this right and (...) in case of need provide material assistance and support programmes, particularly with regard to nutrition, clothing and housing.” Continuing high child and family poverty levels in B.C. violate these rights.

Given the higher poverty rates for Indigenous children and families, keeping the commitments government has made to act on the Truth and Reconciliation Commission Calls to Action and the UN Declaration on the Rights of Indigenous Peoples has important implications for the provincial poverty reduction strategy.

Recognizing that children of recent immigrants and refugees, Indigenous children, children of female lone-parent families, children in many racialized families, children affected by disabilities, and youth aging out foster care are at greater risk of living in poverty, as required in the Poverty Reduction Strategy Act, B.C.'s poverty reduction strategy must include special efforts targeted to achieve major reductions in poverty levels for these populations.

Recommendation 2: Focus on Building a Healthy, Resilient and Inclusive Society

There is ample evidence that socioeconomic position is one of the most important social determinants of health. Children who are raised in poverty face risks to their health over their life course.ⁱ In contrast, healthy, well-supported children and youth are more likely to become the engaged and contributing citizens that are essential for creating a healthy, sustainable society.

International studies have shown that high rates of economic inequality negatively impact both the rich and the poor on a range of health and wellness measures.ⁱⁱ B.C. studies also show the impacts of poverty on people's vulnerability to chronic disease and the effects on their life span.ⁱⁱⁱ

Allowing income and wealth inequality to continue to grow in B.C. brings with it increased health and social costs related to higher rates of many chronic diseases, obesity, mental illness, suicide, violence and addictions. Beyond these negative health effects and the widespread suffering that accompanies them, growing socioeconomic inequality erodes social cohesion, empathy and compassion, which leads to increased social isolation, stigmatization and marginalization of the poor, distrust, crime, stress and despair.

Inequality reduces social mobility,^{iv} undermining the promise of a fair society and increasing social alienation for those left behind. The vulnerability of children is underscored by the research on the impact of economic inequality on children's well-being which demonstrates a direct correlation between a large gap between the rich and the poor in wealthy societies and reduced child well-being.^v

BC's poverty reduction strategy must be intentionally focused on creating a healthy and resilient society, founded on respect for human rights, fairness, the importance of building social cohesion and reducing inequity, including inequities of age, sex, gender, ethnicity, sexual orientation and ability, as well as poverty.

Recommendation 3: Establish a Quality, Affordable, Accessible Child Care System

A key measure to reduce child and family poverty, particularly for lone-parent families, is to address the child care crisis.

B.C. and the federal government have made historic investments and policy changes in beginning to build the BC child care system families need. However, we are still in the early stages of creating the truly public system envisioned by the \$10aDay Child Care Plan. Families with young children continue to face a child care crisis — a crisis in affordability and access to quality, regulated care. Child care providers face a crisis in recruiting qualified early childhood educators because relying primarily on parent fees has meant wages have stayed low. This crisis is affecting parents' ability to return to work after the birth of a child and their decisions to even have children.

The fiscal costs of this crisis for families, for businesses and for the province are an unnecessary drag on the provincial economy, and the implementation of a universal, regulated, quality child care system is a well-researched remedy to this crisis.

The provincial poverty reduction strategy must include continuing to prioritize new early learning and child care investments to establish universal access to a system of high-quality, affordable, inclusive and publicly accountable system of child care for B.C. children and families that is fee-free for low-income families, as envisioned by the \$10aDay Child Care Plan. To build this system, government must urgently focus on ensuring early childhood educators are paid compensation that reflects their education and the importance of the work they do and supporting an Indigenous-led process to implement the Indigenous Early Learning and Child Care Framework.

Recommendation 4: Continue to Raise the Minimum Wage

The statistics on the depth of poverty show poor children in BC, including those living with parents working full-time or part-time, are being raised on median annual incomes between \$11,000 to \$12,000 below the poverty line.

Even with the increase in the provincial minimum wage to \$16.75 later this year, the annual income for a single parent with one child working full-time, full-year would be \$12,445 below the 2020 before-tax poverty line for this family size.

Stagnating wages and precarious work leaves families face soaring costs for essential living expenses such as housing, food, child care and transportation, and a social safety net that has failed to respond to this growing unfairness and inequality.

To address the depth of poverty for working poor families with children, B.C. must establish a permanent Fair Wages Commission to examine issues related to low wages and precarity in BC to advise government on strategies that bring workers above the poverty line. All workers in BC should be covered by the hourly minimum wage.

Recommendation 5: Continue to Raise Income and Disability Assistance Rates

In 2020, there were significant temporary pandemic supplements in federal and provincial contributions to welfare incomes. However, income assistance rates remained below the poverty line, with severe consequences for the health of parents and children depending on this income.

A couple with two children on temporary assistance in 2020 had a total annual income that was just 77% of the poverty line, leaving a poverty gap of \$11,208. A single parent with one child had a total income that was also 77% of the poverty line for this family type, leaving a poverty gap of \$7,858 per year.

The pandemic supplementary benefits have now ended.

We recommend the provincial poverty reduction strategy aim to significantly raise income and disability assistance rates to bring total welfare incomes up to the CFLIM after-tax poverty thresholds and index them to inflation.

Recommendation 6: Index the BC Family Benefit

Direct income transfers to lower-income families with children is a proven poverty reduction mechanism. In 2020, without the Canada Child Benefit, the B.C. child poverty rate would have been 20%, instead of 13%. The contribution of the BC Family Benefit to child health and well-being is powerful and needed. Similarly, without the additional pandemic benefits for families in 2020, the B.C. child poverty rate would have been 20%, instead of 13%.

We recommend indexing the BC Family Benefit to inflation to ensure the value of the benefit does not erode over time.

Recommendation 7: Reduce the Number of Children Coming not Government Care Due to Poverty

Poverty, often defined as 'neglect,' is the major factor behind many child apprehensions by B.C.'s child protection system. The high percentage of Indigenous children and youth taken into government care illustrates the disproportionate effect of this factor.

Families raising children with support needs and medically complex conditions often are struggling with poverty due to the impacts of caring for their children on their ability to work. Government support programs for these families are insufficient and have unnecessary eligibility barriers. As a consequence some families make the difficult decision to put their children into voluntary care.

Grandparents and other kinship caregivers also struggle with low incomes, often due to government policies that unfairly ignore their circumstances or divert the child benefit payments to the province instead of making sure the child receives the benefit directly.

B.C.'s poverty reduction strategy must aim to reduce the incidence and depth of child and family poverty in order to reduce the number of children who come into government care.

The Ministry of Children and Family Development and the Ministry of Health must be given sufficient resources to support more services to keep children at home with their families when it can be made safe to do so, and to strengthen the system of guardianship workers, foster parents and other caregivers when it is not.

Increase program funding and support for families raising children with disabilities and complex medical needs to ensure they have timely, universal access everywhere in BC to a core suite of early intervention therapies; timely assessments; family respite; inclusive child care; health, medical and in-home supports.

The transition of child welfare authority to Indigenous authorities must include adequate funding to establish high-quality services.

BC must also commit to funding that ensures no child in care will grow up in poverty.

Recommendation 8: Work with Youth to Establish Comprehensive Supports for Youth Aging out of Care

B.C. has made good progress on increasing supports for youth transitioning out of care, including extending the age of eligibility for supports, post-secondary tuition waivers and supports, rental housing subsidies and other policy enhancements. However, but there is much more to do to make sure the needs of youth who require more social, mental health, and life skills supports in their transition to adulthood are recognized and met.

Ending the high proportion of youth from care who experience homelessness is an urgent concern.

We recommend automatically enrolling all young people transitioning out of care in an income support program that meets their basic living costs and ensures they have safe, secure and affordable housing.

Recommendation 9: Support Immigrants and Refugees

Many immigrant adults are under-employed in jobs that are lower in skill than the job they held prior to immigrating to Canada. And for many families the impacts of poverty are compounded by the housing affordability crisis and the difficulty accessing child care.

Refugees who have experienced trauma can be highly vulnerable and have even greater difficulties leaving the cycle of poverty.

We recommend intensifying efforts to help immigrants and refugees adjust to life in Canada by enhancing employment assistance, removing long-standing barriers to foreign-trained professionals accessing jobs in their field, making more language training with child care available, and improving employment standards and human rights protections and enforcement.

Recommendation 10: Support the Right to Housing

Housing has become unaffordable for too many families in B.C., including rental accommodation.

The poverty reduction strategy must support the right to housing for children, youth and families by:

- **Scaling up funding to build thousands of new social and affordable rental housing units and maintain existing affordable housing stock to reduce the number of families in core housing need and to eliminate homelessness.**
- **Protect renters from rent-related or renovation evictions.**
- **Enhancing and expanding rental subsidies and other income supports to families living in or near poverty to reduce housing insecurity.**
- **Providing additional funds to social service agencies and non-profit housing societies to provide housing and other supports to populations at higher risk of homelessness such as youth without family support and women with addictions who have young children.**
- **Fully fund and expand access to shelters and support for women fleeing violent relationships with their children.**

Recommendation 11: Ensure Access to Public Transportation

It is well-established that access to public transportation improves the quality of life for individuals and the health of communities.

Transportation costs create barriers for those living in poverty to access education, health care, child care, employment opportunities and a myriad of services that would assist them. Children and youth in poor families should not have to miss school because they can't afford transit fares.

In both urban and rural communities access to safe public transportation is critical to social mobility.

We recommend B.C. provide free public transit for minors ages 13-18 and free or reduced-fee transit access for low income households.

Recommendation 12: Fund Public Education to Meet the Needs of Students

Public schools have the mandate and responsibility to reduce the inequities and barriers to full participation and necessary supports faced by students living in poverty.

We recommend the province ensure K–12 public education funding is sufficient to mitigate inequities between high- and low-income neighbourhoods, school districts and families and to ensure appropriate inclusion of students with diverse learning needs. This includes enhancing funding to school districts for special education assistants, arts programming, libraries, student support services, and deferred maintenance, among other areas that still require urgent attention in future provincial budgets.

We recommend the province contribute funding to establish a universal, cost-shared, healthy school food program for all K–12 students that is respectful of local contexts, connected to community and curriculum, health-promoting and sustainable.

Recommendation 13: Ensure Access to Post-Secondary Education

Low- and middle-income young people in BC know they need a post-secondary education as a path to a job or career that will, hopefully, pay a living wage and allow them to support a current or future family. But many are asking themselves if their post-secondary journey will actually be a path into poverty.

Students are faced with unaffordable tuition fees and crushing levels of student debt, often at the same time as they are starting, or wanting to start, families. Students who must borrow to attend post-secondary school are paying a premium for their education, compared to those who do not have to borrow.

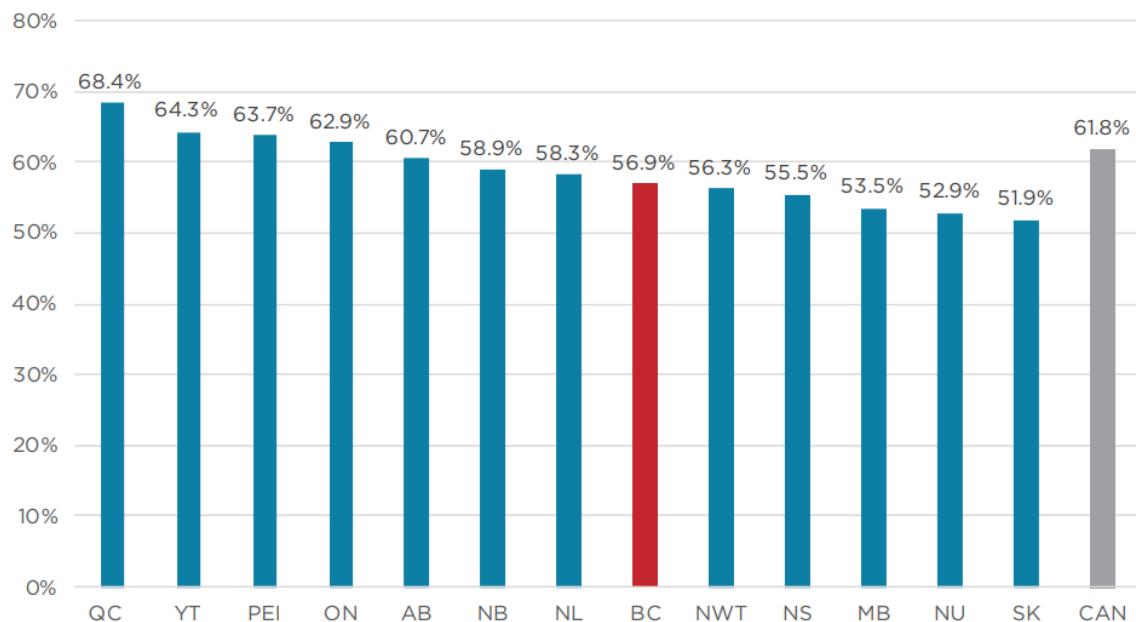
In the short term, we recommend that B.C. reduce post-secondary tuition fees.

In the long term, we recommend both the federal and provincial governments should make post-secondary education free for Canadian residents.

Recommendation 14: Implement Fair Tax Policies

We recommend that B.C. investigate what other provinces are doing to reduce their child poverty rates through government transfers. Here is a graph showing how B.C. ranks in comparison with other provinces and territories.

Rate of Child Poverty Reduction by Government Transfer Payments, by Province/Territory, 2020



Source: Statistics Canada custom tabulation, data from T1 Family Files 2020

We also recommend that, within to the maximum extent it can, within its jurisdiction, B.C. address growing income inequality and generate revenue for poverty reduction programs by eliminating or reducing highly regressive and expensive tax loopholes, closing tax havens, taxing extreme wealth and implementing an excess profit tax focused on corporate pandemic windfalls.

End Notes

ⁱ World Health Organization, Commission on Social Determinants of Health, Closing the Gap in a Generation, Health Equity through Action on the Social Determinants of Health, 2008.

ⁱⁱ The Equality Trust, The Spirit Level <https://www.equalitytrust.org.uk/about-inequality/spirit-level>.

ⁱⁱⁱ Health Officers Council of BC, 2008 and 2013, <https://healthofficerscouncil.net/positions-and-advocacy/poverty-and-health-inequities/>

^{iv} <https://www.theglobeandmail.com/news/national/a-tale-of-two-canadas-where-you-grow-up-affects-your-adult-income/article35444594/>

^v Equality Trust, <https://www.equalitytrust.org.uk/child-well-being>



Submission on the BC Poverty Reduction Strategy Update

Foundations for Social Change (FSC) is a charitable non-profit organization developing evidence-based models for social programs and policies that work to support and uplift the homeless population of Greater Vancouver. FSC is responsible for the New Leaf Project (NLP), North America's first ever direct cash transfer initiative with people experiencing homelessness, as well as the current New Leaf Expansion Project (NLEP). FSC works with a number of community organizations to improve upon and execute social programs like the New Leaf Project and New Leaf Expansion Project.

The New Leaf project provided 50 cash recipients with a one-time lump sum cash transfer of \$7500, an amount which was benchmarked against BC's annual welfare benefit in 2016. The pilot project yielded a number of promising results: On average cash recipients experienced a 28% decrease in days homeless within the first month and moved into stable housing faster than non-cash participants. Cash recipients also reallocated their spending to prioritize necessities such as housing, food security, bills and debt payment and decreased spending on temptation goods such as alcohol, drugs, cigarettes, and gambling (FSC,2021). The New Leaf Expansion project is providing 200 participants with \$8500, the equivalent to one year's provincial and social assistance payments for an individual.

FSC wants to see BC residents grow in their financial resiliency and support low income and impoverished residents to move out of chronic poverty. There are a number of ways in which FSC can see the BC government making changes to ensure these goals are achieved.

Decrease Barriers for Accessing Supports

FSC plays a key role in connecting individuals to community workers, community organizations, and social programs in Vancouver. In facilitating connections and partnerships between organizations and homeless individuals it has become increasingly prevalent the number of barriers which prevent individuals from accessing available supports.

Financial need is not the only barrier to accessing supports for low-income individuals. Some individuals who FSC work with face administrative barriers such as a lengthy and difficult ID replacement, whereas others face a lack of hope and increasing despair thus preventing them from accessing future benefits, others further face stigma and racialization further emphasizing the existing barriers to accessing services.

Improving ease of access to supports will allow individuals to build financial autonomy and resiliency thus increasing the chance and pace which individuals can move off of government supports. In turn this will save money for governments, organizations and individuals alike.

Recommendations

- Merge the income components for shelter and support allowance with disability assistance payments.
- Raise the threshold for allowable earnings for individuals receiving income and disability assistance and put a hold on the reduction of benefits based on potential or passive income, thus ending the clawback of unearned income.
- Remove the restrictions on asset accumulation that are obstructing individuals from establishing financial security and a safety net. Reform the system to facilitate and incentivize individuals to plan for the future and gain financial autonomy and improve financial resiliency, rather than placing penalties on doing so.
- Benchmark benefits, disability, and income assistance against rising inflation rates to ensure benefits are providing enough support for individuals to make and maintain positive change.
 - \$7500 was given in the NLP compared to \$8500 in the NLEP. \$7500 in 2020 went substantially further than \$8500 in 2023, due to rising inflation and costs of living. It is essential that benefits increase at the same rate as inflation in order to maintain their ability to provide sustained support to the individual.
- Simplify the process, timeline, and financial constraints of replacing ID to ensure all low-income individuals have the ability to access banking services, file taxes, and access government benefits. Additionally, collaborate with banks and credit unions to improve access to inclusive, affordable banking services. This includes increasing the banking services available to individuals with challenging credit histories, so that they can rebuild their credit and pay off debt more accessibly.
 - Many participants in the NLP and NLEP have lost their ID or experienced a theft in which their ID has been stolen. Without ID participants cannot access banking services to receive a direct cash transfer or other financial benefits.
 - ID replacement can be costly and lengthy taking over 1.5 years to replace a Canadian citizenship certificate or permanent residency card.
 - Vancity and PHS community services provide low barrier banking through Pigeon Park Savings in the Downtown East Side. This eliminates many, but not all ID barriers.
 - As the account services/usage limits available to Pigeon Park Savings clients have significant limitations, reduce the regulatory barriers which impose such limits on account use.
- Improve access and awareness to the benefits linked with the tax system by simplifying said system, introducing automatic tax filing, decreasing barriers to accessing tax clinics (i.e., many are not available for independent contractors/self-employed individuals, additionally there are a limited number of

free tax clinics), and decreasing penalties for not filing taxes on time by lowering interest rates and improving the ease of applying for deferrals.

Increase Resources for Seniors post Covid-19

The NLP recruited participants from 2017-2020 who were between the ages of 19 and 65 and identified as homeless without serious risk of substance abuse, mental health concerns, or problematic gambling behaviours. The NLEP uses the same eligibility requirements but has had to recruit post-pandemic. The NLEP recruitment phase began in May of 2022 and has since reflected an alarming number of seniors aged 65+ who would otherwise be eligible and are currently living homeless.

FSC partners with a number of community organizations across the Greater Vancouver area, some of which offer rent banks to help alleviate the number of evictions seen during the current housing crisis. One organization in North Vancouver runs a senior specific branch of programs (Hollyburn Family Services, 2022).

Canadians are continuing to live longer healthier lives with many residents needing to work past the age of retirement in order to maintain a standard of living above the poverty line. However, a number of seniors may not be able to continue working into their retirement age due to lack of physical abilities, job losses with growing industries, etc. Covid 19 also saw many seniors fall on hard times. The cost of living continues to rise with growing inflation rates, and many Canadians are saving less for retirement now than they were able to save pre-covid.

Recommendations

- Provide an additional benefit to seniors (65+) which reflects the same benefits the COVID Emergency Response Benefit (CERB) provided to unemployed individuals in 2020.
 - Many seniors were unable to access CERB during Covid-19 as they did not meet the eligibility qualifications of having lost employment due to the onset of Covid-19. The CERB benefit allowed many low-income individuals to move from a place of financial scarcity on or below the poverty line and into a place of financial resiliency. Since the removal of CERB many individuals are struggling to maintain their financial security.
 - Allocating a benefit similar to UBI specifically for eligible seniors will help to ensure the longevity and financial security of Canada's aging population and help prevent many low-income seniors from becoming homeless and entrenched in poverty.

Increase Financial Resiliency for the Invisible Homeless

The target population of the NLP and the NLEP is the invisible homeless. Often these individuals or families have been homeless for less than 6 months and are couch surfing with friends and families, living in vehicles and trailers, facing evictions, and living in generally precarious situations (FSC, 2021). This population does not usually struggle with severe mental health conditions, severe substance abuse, or problematic gambling, thus

increasing the likelihood and ability for this population to move from homeless to housed and prevent themselves from becoming entrenched in poverty.

The invisible homeless live on or below the poverty line. Many become homeless due to circumstances beyond their control such as leaving an abusive situation, losing a job, becoming unable to work due to accident, injury, or poor health, etc. Often these individuals face challenges to move above the poverty line such as needing to invest large sums of money in damage deposits, first and last month's rent, education programs, or supporting other family members financially. A one-time lump sum can be highly beneficial in moving individuals above the poverty line and providing a financial lift up which can lead to financial autonomy and improved financial resiliency.

Recommendations

- Provide unrestricted and substantial (\$8500+) one-time lump sums to eligible individuals similar to UBI or a rent bank subsidy.
 - An unrestricted cash transfer has the greatest potential to lift individuals out of poverty by providing autonomy to spend as an individual sees fit for their specific needs. Some individuals may need to prioritize transportation to improve their quality of life whereas others may need to prioritize housing, education, or health care.
 - A large lump sum provides more freedom and potential for greater benefit as opposed to a smaller month to month benefit. A larger benefit can be spent on items such as a damage deposit whereas smaller more frequent benefits are often spent on groceries or month to month bills.
- Utilize regulatory and fiscal measures at the Province's disposal to promote the development of affordable housing units, which will serve low-and middle-income tenants and can be owned both publicly and privately.
 - Providing safe, clean, and affordable housing outside of the Downtown East Side core can help alleviate BC's housing crisis especially for low-income families facing homelessness.
- Building upon the recently instigated Child Tax Benefit, more supports specifically for single parents facing homelessness are needed. This might include an increased number of shelters which can take children and teens to avoid splitting up families or keeping families out of shelters and on the streets. Provide more shelters for women with teenage sons, and for single fathers with children that are not overly populated by individual men.

Increase Financial Resiliency for Highly Marginalized Populations

Indigenous communities are overrepresented in Vancouver's homeless population (Homeless count BC, 2020). There are few organizations serving specifically indigenous populations in Vancouver. In order to tackle indigenous poverty, an indigenous specific poverty reduction plan must be implemented. For this to be successful, it must be led by indigenous populations and organizations and prioritized by the BC government.

Other populations such as sex workers and trans folks are also highly marginalized and overrepresented in Vancouver's homeless populations. Specific measures must also be

taken here to decrease stigmas in an already highly stigmatized group and increase the number of sex work specific and trans specific supports available.

Conclusion

FSC recognizes that there is a vast number of recommendations and areas for which the BC government can reduce poverty which have not been discussed in this submission. For example, time poverty is increasing and presenting an increasingly prevalent barrier for individuals to access support. FSC urges the BC government to pay attention to rising trends in Vancouver's impoverished communities which have emerged since the pandemic. Key areas to consider:

- The number of seniors living below the poverty line is increasing
- The number of invisible homeless is increasing
- People are unable to create a safety net through savings with rising inflation and cost of living

FSC knows it is possible to decrease barriers to accessing supports and urges the BC government to provide similar supports to the Kettle Friendship Society's ID bank, Vancity and PHS's Pigeon park savings, Family Services of Greater Vancouver's free financial coaching. FSC also commends the BC government for honouring our MOU with the MSDPR to allow for individuals receiving welfare to also receive cash supports in the NLEP research study. Allowing individuals to access multiple available supports without penalty will be integral in both dignifying and lifting low-income individuals and families over the poverty line. FSC looks forward to helping improve policies most affecting Vancouver's homeless population through the updating of TogetherBC: B.C.'s Poverty Reduction Strategy and the Poverty Reduction Strategy Act.

Citations

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THE BRITISH COLUMBIA POVERTY REDUCTION STRATEGY (2024) - POLICY BRIEF SUBMISSION

Submitted: 08/31/2023

Home Sharing Support Society (HSSBC)

HOMESHARINGBC.CA | Email: info@homesharingbc.ca

The Home Sharing Support Society of British Columbia (HSSSBC) would like to thank the Ministry of Social Development and Poverty Reduction for this opportunity to share our suggestions during the development of the Spring 2024 *British Columbia Poverty Reduction Strategy*. We hope that our research and recommendations are useful for this important undertaking and look forward to seeing how future poverty reduction policies can steward a more inclusive and equitable approach to address systemic issues faced by marginalized and vulnerable populations.

We congratulate the government for your commitment in implementing a comprehensive poverty reduction plan for BC. Aligned with our own values of equity, diversity, and inclusion, we would like to present our submission in consideration for the legislative review of two acts that govern the BC Employment and Assistance (BCEA): the Employment and Assistance for Persons with Disabilities and the Employment and Assistance Act.

Overview

Individuals navigating the justice system and leaving prison face numerous complex challenges that impede a safe and successful reintegration back into society. Having access to employment and assistance opportunities is one important element in promoting the livelihood and wellbeing of those individuals, their families, and their communities. The intersection of race, sex, gender, ability, nationality, class, physical and mental health, and other factors are determinants of what barriers ex-offenders face, and how easily they can access employment opportunities. HSSSBC's vision and mission lies in enhancing and supporting the sustainability and quality of Home Sharing and other housing options for adults with developmental disabilities throughout British Columbia. Therefore, it is important to advocate for practices that eliminate systemic barriers for those with disabilities to be able practice independence, have equal choices, and benefit from extra support in order to enjoy fulfilling lives. Canada must work with provinces, territories, employers, and civil society to eliminate the current barriers of employment for this vulnerable group to lift them out of poverty, while building their capacity and resiliency. This policy brief will discuss the following issues regarding individuals either in, or released from, correctional facilities:

- The relationship between employment, reintegration, and recidivism
- Diversity and inclusion - person with disabilities
- Employment conditions post-release
- Variables affecting employability
- Wage gap amongst ex-offenders
- Cultural safety and inclusion – Indigenous peoples
- Impacts of the criminal record
- Recommendations

Employment, Reintegration, and Recidivism

Upon leaving a correctional institution, one crucial step in reintegration as a law-abiding and self-sufficient member of a community is to secure employment (Andrews & Bonta, 2010). However, when released, individuals face numerous complex challenges when searching for jobs. This can range from individual-scaled factors such as low self-esteem, low motivation, lack of vocational training, lack of stable accommodation, mental illness, substance abuse and dependency, to higher social barriers such as negative influence from peers and an absence of familial support (Visher, et al., 2005; Rakis, 2005; Graffam, et al., 2004).

The relationship between living with a disability and being at risk of being homeless is prevalent (BC Non-Profit Housing Association, 2020). Stigma and barriers surrounding disability can limit the resources needed to perform well at jobs and achieve long-term success in a career, such as equal housing opportunities (Canadian Human Rights Commission, 2019). Considering that law enforcement often arrests individuals experiencing homelessness due to minor offences, a cycle of recidivism, housing instability, and poverty is thus perpetuated (Aubry, 2008).

For people leaving correctional institutions, obtaining employment has been associated with reduced rates of reoffending and lower rates of returning to custody (Berg & Huebner, 2011). The impact of possessing legitimate employment for this group of people can be explained by utilizing the Social Control Theory as a framework. This theory proposes that work functions as an informal mechanism of social control (Sampson and Laub, 1997). Although the exact relationship between employment and re-offending is unclear in current literature (Webster et al., 2001), some suggest that it is not merely possessing a job that brings about positive change, but the quality of it (Uggen, 1999). This relationship becomes more complex as we factor in other third variables such as whether an individual can acquire stable accommodation, not have substance abuse-related issues, and gets help from others during a job search (Niven and Olagundoye, 2002).

Diversity and Inclusion - Person with Disabilities (PWDs)

Persons with disabilities in Canada face significantly higher rates of poverty, unemployment, exclusion from education, and discrimination, compared to persons without disabilities (CRPD Committee, 2017). Article 5 of the United Nations Convention of the Rights of Persons with Disabilities highlights all person's equality and before and under the law, and simultaneously, presents the specific and separate need for accommodations to be made for PWD to achieve equality. Despite Article 5, and Canada's constitutional prohibition of discrimination for employment, almost 50% of discrimination complaints filed in Canada involve people with disabilities (Canadian Human Rights Commission, 2015).

Article 27 of the same convention recognizes the right of PWDs to work on an equal basis with others. This involves safeguarding and promoting the realization of the right to work by taking appropriate steps, including building better legislation. Currently, PWD face significantly higher rates of unemployment than those without disabilities in Canada. In 2022, the unemployment rate of was nearly twice as high for PWDs than those without. Close to 24% of unemployed PWDs had been unemployed for 27 weeks or more, compared to ~15% of those without disabilities (Government of Canada, 2023). Women with disabilities, people with hard of hearing or Deaf, and blind persons have higher rates of unemployment than other PWDs. Additionally, racialized

persons, new immigrants, and Indigenous persons, disproportionately represent people who depend on precarious employment. Concerningly, the prevailing model of support provided for people with intellectual disabilities are segregated day programs and sheltered (CRPD Committee, 2017).

National data on the number of PWD in prison, and PWD receiving reasonable assistance in prison is inadequate, especially regarding those who are blind, Deaf, or hard of hearing. Deaf people who are in prison have reported a lack of sign language interpreters and have challenged communication with others in the facilities. Consequently, they do not benefit from equal access to programs that would otherwise aid them in gaining skills for reintegration upon release (CRPD Committee, 2017). With unmet accessibility standards in prison for PWDs, post-release employment options can be particularly limited.

Employment Conditions

Individuals released from correctional institutions report the process of seeking and retaining fulfilling jobs to be a challenging process. Nearly half of individuals released from incarceration are unemployed (Visher et al., 2011) and, of those who do obtain employment, close to half cited receiving incomes below the poverty line (Nally et al., 2013). Marginal employment is often the best people can acquire – receiving an annual income that is insufficient to support them for their daily needs (Nally et al., 2013).

Alarming, poor economic outcomes were still found in Canadians who had federal offences, even after an average of 14 years since leaving correctional institutions. In 2014, the average employment income of Canadian ex-offenders was at least half of the median employment income of people in the general population. Many were living below the poverty line with a median income of \$0. Social assistance payments were relied on 10 times more than the general Canadian population (Babchishin, 2021).

Variables Affecting Employability

The overrepresentation of women, Indigenous people, black Canadians, and PWD in the criminal justice system speaks to the unique challenges they face in society that need to be addressed when planning safe and successful reintegration. Employability after release can speak to the different intersectional discrimination faced by marginalized populations from society.

Currently in Canada, comprehensive data on imprisonment PWD is significantly limited (Matheson, 2022) and information of this group in the work force upon release is also unavailable. Amendments to this gap can help clarify what steps need to be taken to provide needed support.

Regarding differences in gender, studies have shown that men are more likely to be employed after leaving correctional institutions than women, and acquire employment much faster (Duwe & Clark, 2017; Gillis & Nafekh, 2005). Older individuals are less likely to be employed than younger individuals post release (Duwe & Clark, 2017; Visher et al., 2011). The presence of racial biases is also apparent in the discrepancies of employment rates observed between racial groups (Duwe & Clark, 2017; Visher et al., 2011). For example, Caucasian individuals are more likely to be employed than non-Caucasian individuals - a finding that is attributed to racial discrimination (Nally et al., 2013).

Along with demographic factors, several other variables can impact obtaining employment post-incarceration. Individuals with greater employment history prior to incarceration, connections to a prior or potential employer, and having greater prosocial ties to family members were more likely to obtain a job than those without (AAltonen, 2016; Berg & Huebner, 2011; Berg & Huebner, 2011).

A greater number of convictions and prison misconducts (Duwe & Clark, 2017), and poorer physical and mental health conditions (Visher et al., 2011) were found to be associated with a lower the likelihood of employment. Currently, over 60% of individuals under correctional supervision in British Columbia have been diagnosed with mental health or addiction needs (BC Corrections, 2021). While some centers provide work skill programs, including animal care, road clean up, invasive weed removal, and tailoring, they also have been criticized for providing training for out-of-date jobs that do not meet modern market demands. Large agencies in Correctional Service of Canada, such as CORCAN, are argued to teach inmates basic and untransferable skills, and have only attracted 8% of the prison population in its programs (Burke, 2017).

Wage Gap

As the annual income of offenders increases, reoffending rates decreases (Nally et al., 2013). Given that adequate income affects how successfully an individual can reintegrate into society, it is concerning to observe wage-gaps between populations. PWDs are found to be paid around 20% less than their counterparts without disabilities (McDiarmid, C., 2023). Women with disabilities earn approximately 20% less than men with disabilities (Government of Canada, 2023). Taking a closer glance at the difference of income between disability types revealed that persons with cognitive disabilities had the largest pay gap compared to those without disabilities - about 46% less. PWD are also underrepresented in the higher income levels and more likely to live below the poverty line (Wall, 2017). With a lack of proper access to work for this group, there has been a sharp rise in part-time or precarious jobs, which also lack the provision of benefits. PWD are amongst populations that are disproportionately represented in those depending on these types of jobs.

Amongst those without disabilities leaving incarceration, women and non-Caucasian individuals have found to typically earn less than men and Caucasians respectively. Additionally, women made less than their male counterparts – a gender wage gap that persists even after 14 years since release. Women also relied more on social assistance payments than men. Indigenous individuals are found to earn less than their other non-indigenous counterparts (Bailey et al., 2017).

Cultural Safety and Inclusion - Indigenous Peoples

Indigenous peoples in British Columbia encounter ongoing socio-economic and political discrimination, which has correlated with unequal treatment in every part of the justice system. Respectively, the rate of incarceration for Indigenous people in British Columbia is disproportionate (Sapers 2016). Indigenous people are nearly 6% of the province's adult population, yet they make up 35% of the individuals in custody, and 27% of individuals in the corrections community. These inequities are perpetuated by a lack of adequate federal and

provincial support for indigenous related correctional programs that uphold cultural values and traditions (Sapers 2014).

Efforts of healing, rehabilitating, and restoring for Indigenous people, both within and beyond prison, calls for a decolonized approach which negates existing colonial and capitalistic notions of progress and productivity. Despite the urgency for restorative rehabilitation and justice initiatives that honor the numerous ancient practices of Indigenous peoples in BC, many programs still focus solely on the individual, and in turn, communal spheres become completely excluded. It is argued that prison employment programs generally attempt to rehabilitate incarcerated individuals into 'productive citizens' (Wheatley 2016), which in the capitalistic and colonial lens, indeed curtails restoration. The correctional work programs ran by federal prisons in BC have geared their focus on individualistic change, which has led to a mismatch between prison vocational experience and the demands of the labor market (Nolan 2014; Richmond 2014). Adopting more culturally safe interventions for employment and the reintegration of individuals can be a vital step in addressing this gap. For instance, one initiative in BC was found to foster artistic and healing spaces for Indigenous inmates through the creation and distribution of art, as opposed to providing work that may be perceived as meaningless and mundane for this population (Brown & Timler, 2019).

Criminal Record

Not only is possessing a criminal record with a charge can be a barrier to gaining employment, but its mere existence in the recruitment process can be one as well. Requesting proof of a clean record is quite common to many job applications in Canada. Some regions in Canada categorize a criminal offence history as a status that should not be used to discriminate between candidates, whereas other regions allow it to be considered during the hiring process. While BC is a province that does not allow discrimination against previous criminal charges, studies have found that employers are biased towards hiring individuals without a criminal record (Batastini et al., 2017), even though most violent acts in the workplace are instigated by non-workplace employees (AAltonen, 2016). Training programs can theoretically reduce prejudice against employing persons with a criminal record, but they have not been able to have this impact in practice (Batastini et al., 2017).

Requesting verification for criminal records may lead to job application delays and eventually preclude employment (Babchishin, 2021). For instance, when an applicant requests a criminal record in Canada, and the record reflects a previous charge, a fingerprint verification must be completed before the record is sent back to the applicant. This process alone can take up to 3 or more months (RCMP, 2014), which can be a prolonged period for anyone trying to earn an income through legal means (Babchishin, 2021).

For those with PWD, a criminal record can present itself as a mechanism that self-perpetuates a cycle of poverty. As mentioned previously, the link between living with a disability, being homeless, and becoming involved in crime can further marginalize groups of people. A criminal record check upholds stigmas and barriers for accessing safe housing and securing employment.

Recommendations

Reintegration services must provide the extra practical assistance that PWDs may require. Social services organized through multidisciplinary collaboration and community-centered treatment models for continuous care can better address the risks, needs, and vulnerabilities of this group (Hartwell & Orr, 1999). Importantly, prioritizing Equity, Diversity, Inclusivity, and Accessibility in interventions and policies can incorporate the specific needs of PWDs to facilitate equitable access to the same employment training and opportunities as others. Existing or future programs that are exclusionary can miss their mark in building the capacity and strength of individuals leaving the justice system. Aside from suggestions previously mentioned, here are a few examples of how to target existing challenges facing marginalized groups:

- Regarding gaps for PWDs:
 - o Offering prison officers training and sensitized to the needs of prisoners with disabilities.
 - o This can include finding accessible entry for buildings or having support for those who are impaired. Institutions can consult community organizations to best address the specific needs of prisoners that have disabilities. Community-based agencies can also be facilitated to provide extra assistance for PWD in prison to prepare them for re-entry into society.
 - o People with learning disabilities face the challenges associated with the inability to read or write well, paired with poorer verbal and comprehension skills, making them vulnerable with ridicule, isolation, and deterred to participate effectively in programs. Respectively, support needs may be on a relatively low level, but they are long term. For instance, enhancing skills such as budgeting, paying bills, personal care, and enhancing social network (United Nations Office on Drugs and Crime, 2018).
 - o Learning disabilities can remain hidden, and prisoners with learning disabilities are often hesitant to show their difficulties or ask for help. Effective interventions should also utilize adequate screening tools and referrals for speech and language therapy if needed.
 - o Protocols to guide the sharing of information among agencies as the individual moves through the justice system can ensure appropriate information sharing without breaching confidentiality (United Nations Office on Drugs and Crime, 2018).
- Implementing employment interventions that are characterized by high levels of dedication from staff and individuals who offended (Griffiths, 2007).
- Executing larger studies investigating current reintegration programs, and refining assessment tools to capture complex nuances (Griffiths, 2007).
- Providing employment support from the time an individual enters prison until release and continually afterwards. The outcome of this continuum is dependent upon the development of policies, procedures, and collaboration among parties in the justice system, such as institutional corrections and parole agencies, but also key players in the general population, such as community organizations.
 - o Cross-sectoral collaborative efforts can be beneficial towards improving employment services that are offered to individuals in the justice system, as well as

- to ensure a more seamless transition back into society. Indeed, pre-release measures must address an individual's post-release needs (Rakis, 2005).
- Vocational assessments, conducted early in the sentence, can guide what services can be offered to the person in the future. A series of benchmarks can help assess the progress of the individual's employment preparedness plan. There are scales created to identify the stages in the job search process (i.e., resume writing, interviewing, etc.) in which applicants may require extra training or support in.
 - Key employment interventions include job readiness courses, vocational classes, GED certification, job training, job matching, money management training, and job monitoring through support workers (Visher, Winterfield, and Coggeshall, 2005).
 - Several interventions can be delivered as extensions of vocational training programs that prepare individuals for reintegration into the job market. These can focus on helping them develop job search, interview, and presentation skills, prepare CV and application skills, and information on employment agencies (United Nations Office on Drugs and Crime, 2018).
 - Even if individuals do not necessarily end up using their gained skills from training positions after release, their employability skills such as reliability and trustworthiness can be determinant for their job prospects (HM Inspectorate of Prisons, HM Inspectorate of Probation and Ofsted, 2014). However, vocational training and work programs can have the highest impact when they are developed based on the demands of the employment market.
 - Remuneration that individuals receive from the work they perform in prison, a portion of which should be allocated to a savings fund and be reimbursed to them upon their release, supports individuals immediately after re-entering their communities (United Nations Office on Drugs and Crime, 2018).
 - To have proactive interventions, more meaningful work and apprenticeships that can lead to certifications and partnerships with leading Canadian industries and fields need to be fostered (Burke, 2017).
 - Aligning with the Truth and Reconciliation Commission Calls to Action and the UN Declaration on Rights of Indigenous Peoples, cultural needs of indigenous people must be addressed using traditional indigenous justice concepts and practices.

Summary

Individuals leaving incarceration face many complex challenges in finding employment and reintegrating back into their communities upon release. Securing employment is an important step in becoming a self-sufficient member after leaving a correctional institution. Multiple factors play into the different types of challenges an individual faces upon release in gaining access to employment and fair pay, which can also intersect with one another. In Canada, PWD have higher rates of unemployment, lower wages, and less opportunities to benefit from training programs due to lack of accessibility. In the context of society and the justice system, PWD can become vulnerable from a lack of stable housing, homelessness, escalated criminal charges, lack of equal access to vocational training, lack of tools and resources to address their specific needs, and falling into recidivism after release. Intersections between race, gender,



sexuality for PWD released from prison can underly nuances in the stigma they encounter. The recommendations highlight the need for culturally safe and inclusive interventions to begin prior to the release of individuals and to use programs that meet the market demands. They must prioritize the framework of Equity, Diversity, Inclusivity, and Accessibility to be able to include PWD in their programs and ultimate goals of safer and stronger communities.

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POSITION ON FINANCIAL SECURITY AND INCOME SUPPORT



POSITION STATEMENT

People with intellectual and developmental disabilities must have the income and resources they require; to meet their personal support and income needs in order to secure a standard of life comparable to Canadians without disabilities; and fully participate in all aspects of community. Where income support is required to assure income security, it must provide a meaningful, responsive, and livable income. People with intellectual and developmental disabilities must also have access to the disability-related supports, assistance to navigate the provincial and federal benefits and programs, and income support and benefits necessary to fully participate in society in a meaningful and dignified manner.

POLICY CONTEXT

Canadians with disabilities and their families face staggering rates of poverty that are inexcusable in a prosperous country like Canada. Canadians with disabilities are more likely to live in poverty than other Canadians.

- Seventy-three per cent (73%) of working age adults with an intellectual disability who live on their own are living in poverty, compared to 23% of those in the same age cohorts among the general population.ⁱ

Access to safe and affordable housing is also an issue with a disproportionate number of people with intellectual disabilities in core housing need in Canada.

- 18.5% of persons aged 15 years or older with intellectual disabilities live in a household in core housing need in Canada – more than twice the average for all households in Canada (9.1%) and higher than persons with other disabilities (16.6%)ⁱⁱ
- Adults with an intellectual disability are over-represented among the estimated 35,000 homeless population in Canada – available evidence points to a much greater likelihood of being homeless than the general populationⁱⁱⁱ

People with intellectual disabilities are far less likely than others to have access to paid employment and disproportionately rely on government sources of income assistance.

- People with intellectual disabilities earned 33 percent less than the average income of non-disabled people (\$16,283 versus \$49,235)^{iv}
- Only 25.5% of working age people with intellectual disabilities have paid employment compared to the national average of 75.5%.^v

In Canada, poverty is the most likely outcome for someone with a disability. People with a disability lack the disability-related supports, employment, and income supports they need to live free of poverty, isolation, and exclusion. Financial supports that do exist are complicated to navigate and are often poorly understood and underutilized, especially for those people who do not have access to family and financial expertise to do so.

A comprehensive Federal approach to income security is required now. Recognizing that dialogue on a prospective Canada Disability Benefit is underway and with significant structural changes required, there remains much work to be done to ensure people with intellectual and developmental disabilities have the

income and resources they need to secure a standard of life comparable to Canadians without disabilities, and to fully participate in all aspects of community life.

DISCUSSION

Impact of COVID-19 on financial security for people intellectual disabilities

During the COVID-19 pandemic, income security decisions were starkly exposed for persons with disabilities. Among many things, it illustrated the societal and government expectations that people with disabilities should survive on long-term disability income benefits at 50% or less than what the Canada Emergency Response Benefit provided. During the pandemic, workers in lower wage jobs suffered the greatest losses (reduction in hours, job losses, etc) compared to those in other jobs. This increased the susceptibility of people with intellectual and developmental disabilities being pushed further into poverty.^{vi} This period also highlighted the lack of affordable internet, cell phone usage, and access to information technology tools that have now become a necessity in an increasingly virtual, remote environment where most services and human contact have moved online. Digital or virtual access to services can be considered a positive step for our community but without access to low-cost broadband and accessible technology it has become yet another barrier.

Lack of Data

The data on tracking and reporting of people with intellectual and developmental disabilities needs major improvement. Canada is far behind other international jurisdictions in identifying the quality of life, income, poverty rates, and other outcomes among persons with intellectual disabilities. In fact, Statistics Canada struggles to even fully identify an accurate number of people identified as having intellectual and developmental disabilities and has historically underestimated the size of the population. Collective efforts from all levels of government is needed to properly portray the true economic situation of people with intellectual and developmental disabilities in Canada.

Road to Poverty

Income security for people with intellectual disabilities is not simply about money. Poverty results not only from the absence of money but the absence of opportunity. People with intellectual and developmental disabilities living in poverty lack real choice: having to choose between paying bills and buying groceries, having to rely on doctors for free medical samples and having to buy second rate food. Poverty strips people of their dignity.

Assuring financial and income security requires tackling the multiple factors that contribute to making people with intellectual disabilities disproportionately vulnerable to poverty; in particular, lack of disability-related supports, financial literacy, employment related supports, income support, and inclusive education.

Barriers to receiving quality inclusive education remains a factor in higher levels of poverty experienced by people with intellectual and developmental disabilities. The majority of students with an intellectual disability remain segregated and congregated in special education classrooms which have become a pipeline to exclusion, marginalization and unemployment in adulthood. Access to a quality inclusive education contributes to better employment outcomes. Few adults with an intellectual disability have access to inclusive post-secondary education. When inclusive post-secondary education is made available, as one study concludes, it leads to positive outcomes with 80% of participants gaining employment upon the completion of their studies.^{vii} It is no surprise that poverty remains a likely outcome for the majority of people with intellectual disabilities.

As people with intellectual disabilities continue to be excluded from the labour market, there is an over-reliance on social assistance in this country; a system never designed to address the real income needs of

Canadians with disabilities. Built as a system of last resort, our current systems of income support are failing to provide people with intellectual disabilities the income supports they need to prosper.

Provincial/Territorial Programs

If a person with an intellectual disability is fortunate enough to secure a job, income derived from employment may cause a claw back of provincial and territorial income supports. This claw back or reduction rate can act as a disincentive to earning employment income. Specifically, where threshold rates are low and/or reduction rates are high, people with a disability are unfairly penalized for trying to improve their financial circumstances through employment. Where reduction rates equal 100%, people with a disability are no better off financially to work as they lose \$1 in income support for every \$1 earned through employment income. Further, social assistance levels across the country are vastly inadequate. If you are living solely on provincial/territorial assistance, you are living below the poverty line. According to the National Council of welfare, in all provinces and territories, benefit levels fall below the after-tax low-income-cut-off.

In addition to providing income supports, the provincial and territorial governments are responsible for providing essential disability supports and direct funding; some health-related benefits; and other supports such as training and employment. Many of these programs are tied to eligibility for provincial or territorial income support programs. Although we see a greater role for the Federal government in providing targeted income supports for people with a disability, there remains a strong role for the provincial and territorial governments to maintain and improve supports for people with a disability.

Throughout the pandemic, the need for better cooperation between the levels of government was emphasized, whereby some jurisdictions saw it necessary to claw back the federal COVID Disability Benefit. In advance of discussions regarding a new disability income benefit, in order to be meaningful and effective, any new investments must not adversely impact existing benefits or eligibility for other needed supports. The Inclusion Canada Federation must hold both levels of government accountable to ensure that gains made for people with a disability from a targeted federal income support program must reach those people to whom it is directed. Strong federal and provincial/territorial bilateral agreements are needed to further this goal.

Federal Measures

Federal Income Tax and Easier Access to Benefits

For people with intellectual and developmental disabilities, navigating the filing of income taxes at the best of times is complex and a difficult process particularly when their income is only provincial income support. The pandemic served to heighten the awareness of this as most volunteer income tax clinics closed during this period and were unavailable. The value to having automatic income tax filing for low-income earners is good tax policy. Many people with low incomes miss out on benefits as a result of not filing a tax return.^{viii} The federal government already has the information needed to get low-income people access to important tax-related benefits.

If individuals do not file their annual tax and benefit form, they do not receive significant government supports such as the Canada Child Benefit or the Guaranteed Income Supplement, which help reduce poverty. Dozens of other federal and provincial benefits also require annual filing: more than \$50 billion of benefits for low and middle income people annually.

A free automatic tax filing system will help ensure millions of low-income and vulnerable Canadians, who face barriers to filing their taxes, receive the benefits they are entitled too. This measure, which was committed to in the 2020 Speech from the Throne, would serve to improve the financial positions of people with intellectual disabilities and could be an easy fix as one way to improve financial outcomes.

Disability Tax Credit

The Disability Tax Credit (DTC) can provide a financial benefit (in the form of a non-refundable tax credit) for many people with a disability and their families. The tax credit recognizes the increased costs that a person with a disability may face and also acts as a gateway for other federal benefits, tax credits, and programs including the Registered Disability Savings Plan. The importance of DTC eligibility in the role of income security can not be discounted.

Numerous studies and reports have highlighted the barriers to access the DTC for certain populations such as the complicated application process, the role of medical practitioners, and fees required to have a medical exam. As long as these barriers remain in place, millions of people with a disability will be unable to access the benefits tied to DTC approval.

Removing barriers to the application process would improve access to those who have given up on applying due to the complex process. Inclusion Canada supports improvements to the application process in order to make it accessible and easier for those it was designed for. We also support a broader social model definition of disability, as recognized in the Accessible Canada Act or by the principles of the United Nations Convention on Rights of Persons with Disabilities, which would allow all people with a disability equitable access to the benefits that DTC eligibility provides.

Considering that some individuals are not approved through an inconsistent application and approval process or are unable to apply as a result of the cost of having a medical practitioner complete the application, these issues could be resolved through revamping the DTC by creating a different eligibility process, and uncoupling the benefits tied to DTC eligibility. If the DTC process remains unchanged, other opportunities for eligibility for the RDSP must be explored.

Registered Disability Savings Plan

The RDSP is a savings plan specifically for people who have a disability to allow for long term savings supplemented by federal grants and bonds based on the household income. Similar to many benefits associated with disability, the rules and restrictions associated with the RDSP are complex, confusing, and uptake of the program is low. This results in potentially tens of thousands of dollars in sacrificed benefits for many people.

Under its current structure, the funds held in an RDSP are largely inaccessible because of the 10-year holdback rule and restricted withdrawals. The RDSP does not provide access to funds without significant penalty until age 60 in most cases. Many disabilities can result in shortened life expectancy meaning people may not be able to access their RDSP assets when they are able to use them. Rules around RDSP withdrawals should allow people to access their funds when they need them with fewer restrictions. People with RDSP assets should not be held in poverty until they are of retirement age.

Canada Disability Benefit

We are encouraged by the government's commitment to implement a new Canada Disability Benefit as outlined in the 2020 Speech from the Throne as well as the 2021 Federal Budget. This benefit has the potential to significantly address the issues of inequality, poverty, and discrimination experienced by people with intellectual and developmental disabilities. Inclusion Canada has prepared a separate proposal titled *Canada Disability Benefit: A Vision and Design Outline*, which sets out the essential elements and guiding principles we envision must be included in a new Canada Disability Benefit. Our focus remains on ensuring the benefit is designed so that it will dramatically improve the lives of people with intellectual and developmental disabilities in our country.

Provincial/Territorial versus Federal Responsibilities

While it remains true that provinces and territories play the largest role in the provision of income support,

the focus of this position statement is targeted towards measures the federal government has in its ability to improve the financial security of people with intellectual and developmental disabilities. Within our Inclusion Canada federation, our member associations will continue to call on their provincial and territorial governments to improve their social assistance and disability support programs for the financial security of the people in their community. The federal government has a larger role to play; the Calls to Action are targeted at the federal level jurisdictional responsibilities.

INCLUSION CANADA'S CALL TO ACTION

The federal government has a responsibility in improving income security for people with an intellectual or developmental disability and could act immediately to do so.

Maximum Impact Priorities

- 1) **Implementing a targeted federal income program for working age people with a disability** – The Canada Disability Benefit - that considers dignity, ease of access, and a livable income level for all people who have a disability in Canada. For a framework of the model Inclusion Canada is advocating for implementation, please refer to the [Canada Disability Benefit: A Vision and Design Outline](#).
- 2) **Modernizing the eligibility for federal programs for people with an intellectual or developmental disability** either through a reworking of the Disability Tax Credit to account for both chronic and intermittent disabilities or by using the Accessible Canada Act definition of disability.
- 3) **Loosening the restrictions for RDSP withdrawals** to allow people more access to their funds. Specifically, change the 10-year holdback rule to allow for greater flexibility in making withdrawals. Permit government contributions to vest after a specified period even if further government contributions are received and changing the formula for Lifetime Disability Assistance Payments (LDAP) to pay out more from the RDSP once these have begun.

Medium Impact Priorities

- 4) **Decoupling the eligibility for the RDSP from the Disability Tax Credit.** This could include recognizing people with intellectual and developmental disabilities who are eligible for provincial and territorial disability support programs as being automatically eligible to participate in the RDSP.
- 5) **Eliminating the barriers to applying for the Disability Tax Credit.**
 - The cost for the application is the fee charged by medical practitioners to complete the paperwork. The federal government should also provide grants to non-profits in the poverty and disability space in every province and territory to subsidize the cost of applying or cover the cost directly.
 - Bring into force the Disability Tax Credit Promoters Restrictions Regulations, stemming from the 2014 Disability Tax Credit Promoters Restrictions Act. This sets a maximum fee that businesses and professionals can charge to assist someone in completing and submitting the Disability Tax Credit application ensuring that refunds from the Disability Tax Credit approval are returned to the people who need them most.
- 6) **Increasing the Disability Supplement for the Canada Worker's Benefit** to reduce disincentives for employment and compensate for the high reduction rates in most provincial and territorial income support programs for people who work.

- 7) **Recognizing that internet access is a necessity and provide adequate low-cost broadband access and affordable cell phone data plans to low-income people** (not just families with young children) through major internet providers across the entire country.
- 8) **Automatically approving specific populations for the Disability Tax Credit** to reduce the effort that people who have a disability make to qualify for all federal disability benefits. This could include, but is not limited to, people who qualify for CPP-Disability, injured workers, or those who qualify for provincial or territorial disability support programs.
- 9) **Making the Disability Tax Credit (or any future form that it takes) refundable** for low- and middle-income earners to encourage more people to apply and gain access to the other benefits that come with qualifying.

Systemic Priorities

- 10) **Ensure that GBA+ analysis includes a robust disability lens for all government programs, policies, initiatives, and data collection, to understand the impact to people with a disability.** For federal programs to be effective for people who have a disability, the impact of those policies must be assessed with a disability lens. More robust data about people who have a disability, their families and living arrangements, their incomes, and the nature of their disability must be gathered and tracked over time to ensure that federal benefits are reaching those most at risk of income insecurity.
- 11) **Changing access to federal benefits so they are not dependent on filing a tax return.** Have CRA auto-file simple tax returns to ensure that people get the benefits to which they are entitled. For those people who qualify for the Disability Tax Credit, this process should begin at age 16.

ⁱ Canadian Association for Community Living. (2009). *National Report Card on Inclusion of Canadians with An intellectual disability* (Toronto: Canadian Association for Community Living, 2009)

ⁱⁱ Canada Mortgage and Housing Corporation (CMHC) classifies households in core housing need as those which are unable to afford shelter that meets adequacy, suitability, and affordability norms. A household is said to be in core housing need if its housing falls below at least one of CMHC's adequacy, suitability, or affordability standards and if the household would have to spend 30% or more of its before-tax income to pay the median rent of alternative local housing. Canada Mortgage and Housing Corporation, 2001 Participation and Activity Limitation Survey: Issue 7 - Profile of the Housing Conditions of Canadians aged 15 Years and Older with a Developmental Disability, Socio-economic Series 10-013 (Ottawa: CMHC, July 2010)

ⁱⁱⁱ For U.S. prevalence study, see PM Oakes and RC Davies (2008), "Intellectual disability in homeless adults: a prevalence study," *Journal of Intellectual Disability* (December: 12(4):325-334); C. Mercier and S. Picard (2011), "Intellectual disability and homelessness," *Journal of Intellectual Disability Research* (April: 55(4):441-9).

^{iv} Employment, Education, and Income for Canadians with Developmental Disability: Analysis from 2017 Canadian Survey on Disability (p.7) [<click Here for study>](#)

^v Cameron Crawford, *The Employment of People with An intellectual disability in Canada: A Statistical Profile* (Toronto: Institute for Research on Inclusion and Society, 2011).

^{vi} From Risk to Resilience, An Equity Approach to COVID-19, p.29, [<cpho-covid-report-eng.pdf \(canada.ca\)>](#)

^{vii} E. Anne Hughson and Bruce Uditsky, 30 Years of Inclusive Post-Secondary Education, Scope Challenges and Outcomes, P. 64-65 [<click here for study>](#)

POSITION ON INCOME SECURITY FOR FAMILIES

POSITION STATEMENT

Families who have children with an intellectual disability must have the income and resources they need to secure a good quality of life and fully participate in all aspects of their community. Supporting a loved one with an intellectual disability should not negatively impact a family's economic security and financial well-being. Families need access to income and disability supports that enable them to focus on being a family and building an inclusive life.

POLICY CONTEXT

In Canada, families provide most of the support for their loved ones with an intellectual disability. This support is provided freely out of love and commitment.

Parents of children with an intellectual disability have to provide much more support than parents of children without a disability. This expectation continues even when their loved one is an adult. Although adults with disabilities should have access to sufficient support and income to live a life with dignity, this is usually not the reality. Often, one parent stays out of the workforce to meet the support needs of their family member. This has a significant financial impact on families.

The extent of this impact is not well documented. Lack of recent data collection focused on children with disabilities and their families has created a significant information gap. To best inform future policy decisions, it is crucial that disaggregated data, speaking to specific disability type and focused on children and families, be collected.

Based on available data and qualitative experience, we know that:

- 93.2% of people providing support to a family member or friend with a long-term health condition or disability did not receive any financial support from government programs.ⁱ 91.6% did not receive any federal tax credits.ⁱⁱ
- Almost 50% of people providing care to their child with a long-term health condition or disability reported they had unmet support needs.ⁱⁱⁱ
- Financial support, government assistance or tax credits are the most common unmet need among people providing support to a family member or friend with a long-term health condition or disability.^{iv}
- Parents of children with an intellectual disability often have to turn down employment opportunities, work less hours per week, and decline promotions.
- Families of children with disabilities often live in poverty.
- Aging parents are typically expected to continue providing support to their adult family member.

Families are expected to risk their current and future financial security to care for their loved one with a disability. This has an intergenerational impact on financial security, as parents struggle to afford retirement and adult siblings take on added responsibilities.

Lack of access to inclusive, affordable childcare and appropriate disability supports keeps families out of the

workforce or limits their involvement.

Financial programs that help families are difficult to access. Some of these programs don't offer enough money to balance out the cost of raising children with a disability.

DISCUSSION

The role of families

We understand family to consist of two or more people, living together or apart, related by blood, marriage, adoption, or a commitment to support one another.

Families of people with disabilities are not a homogeneous group. Their financial needs may differ depending on where they live (urban, rural, remote northern, or indigenous community), their family structure, or experience as part of a marginalized group (newcomers, indigenous and racialized people, gender minorities, etc.). While this position paper cannot address the unique realities of all families across Canada, we acknowledge that more work is required to ensure the needs of these families are heard and addressed.

Being part of a family is key to the inclusion and belonging of people with an intellectual disability. Families provide a loving, nurturing space to learn and grow. They help their family members with disabilities to overcome challenges and achieve success. They foster dreams and the means to realize a promising future.

Raising children with disabilities is more expensive, time-consuming, and lasts longer. Families often have to struggle to have their loved ones fully included in community life. This places significant social and financial pressure on families. They simply want the assurance that their financial and social wellbeing will be protected, now and in the future.

The financial and support needs of families change and evolve over the life cycle and as family composition changes. Our [Position on Financial Security and Income Support](#) explores the specific needs of adults with an intellectual disability. These two documents can be used together to best understand how to support families throughout the lifespan.

Access to the workforce

Connection to the workforce is key to the financial security of many families. It allows them to meet their current needs and save for the future. For many two-parent households, this means both adults work outside the home. However, families of children with an intellectual disability experience added barriers to participating in the workforce.

Lack of inclusive, affordable childcare prevents single-parent, and two-parent households from fully participating in the workforce. Parents of children with an intellectual disability who are unable to secure childcare must often stay home as their child cannot be left alone, unlike pre-teens and teens without disabilities. This may begin during pre-school, and extend through to adulthood if inclusive, affordable before and after-school childcare is not available. For families of children 13+ who continue to require support, a significant gap exists in before and after-school care and access to disability supports.

The financial security of families is significantly impacted by this limited participation or absence from the workforce. Some families may struggle to meet day-to-day costs of living. This includes added out-of-pocket expenses associated with their child's disability. Extended absences from the workforce also puts the long-term financial security of families in jeopardy, making saving for retirement almost impossible, particularly among single-parent households. In

situations where one parent remains at home to provide support while the other is employed, economic vulnerability and financial dependency may also occur.

Access to financial supports

Even with improved access to the workforce, it's clear that supporting a family member with an intellectual disability comes with added financial costs. While some tax relief measures and financial programs exist to help offset these costs, they are often difficult to access and limited in scope.

The Child Disability Benefit (CDB) is a tax-free monthly payment for families supporting a child aged 18 and under with a disability. To access the CDB, a child must be approved for the Disability Tax Credit (DTC). This process is often long and difficult and requires proof of a 'severe and prolonged impairment'. The 2018 report, *Breaking Down Barriers: A critical analysis of the Disability Tax Credit and Registered Disability Savings Plan*, explains the many problems with accessing the DTC. It is often difficult for people with an intellectual disability to get approved for the DTC based on their 'limitations in mental functioning'. People with lifelong disabilities often have to reapply. For young children, the program often assesses their disability by comparing their development with that of other children instead of looking at the impact of their disability on their daily activities. Because children all develop at different rates, this comparison can make it difficult to establish eligibility. As the gateway to the Child Disability Benefit and other financial benefits, ensuring access to the DTC is critically important for the financial wellbeing of people with an intellectual disability and their families.

The Child Disability Benefit itself offers important financial support to parents raising a child with a disability. This payment puts money directly into the pockets of families. To be effective, the CDB must be considered as exempt income, and not taxed or clawed-back at the provincial or territorial levels. While the CDB is most impactful for low-income families, it should be enhanced to offer greater financial security to a wider range of families.

For some families, provincial or territorial social assistance is their primary source of income. These programs of last resort are not designed to address the financial needs of families raising children with a disability. Strict eligibility rules, earning restrictions, and household policies mean that families of children with disabilities remain trapped in poverty. While these programs require significant reform, small steps like exempting child support payments or cohabitation policies should be implemented now.

Having access to adequate income through employment, and programs like a targeted federal income program, contribute to the financial wellbeing of adults with an intellectual disability. This must be supplemented with access to safe, affordable housing and appropriate disability supports. Although not focused on the family unit, the positive impacts of these programs are often felt by the family as a whole. Knowing that the financial security of their loved one is assured, families can focus their resources on meeting their own needs and saving for the future.

Saving for the future

Family members who are absent from the workforce for long periods of time may find it particularly difficult to save for retirement. Parents who stay at home to support their child do not have access to government savings programs like the Canada Pension Plan (CPP). These parents provide essential support, and their contributions should be recognized and valued. Caring for your child should not mean compromising your future financial security. It's clear that family members who provide support for their loved ones need a solution to save for retirement while continuing to provide this essential support. Innovative solutions have been developed to allow other groups (like self-employed individuals) to contribute to CPP. Similar options should be explored and tested for family members supporting a loved one with a disability.

The federal government has a responsibility to improve the income security of families who support a loved one with an intellectual disability. We recommend they:

Maximum Impact Priorities

- 1) **Provide access to inclusive, affordable childcare for parents of children with an intellectual disability. This must include appropriate before and after school support for children age 12+.**
- 2) **Enhance and rename the Child Disability Benefit.**
 - The Child Disability Benefit should be considered as exempt income for the purposes of provincial or territorial income assistance. The Child Disability Benefit and other child or family tax credits should not result in a 'clawing back' of other financial benefits for families at the provincial/territorial or federal level.
 - Double the current benefit amount (\$242.91 per month) for every eligible child.
 - Increase the threshold at which the benefit starts being reduced to align with the upper limit of the second federal personal income tax bracket (\$98,040 in 2021). The current threshold for this benefit is a net family income of \$69,395). This will provide the greatest level of support to low and middle-income families who need it most.
 - Extend coverage to include youth with disabilities above the age of 18. The Child Disability Benefit should extend to at minimum age 21. However, access up to age 30 would most appropriately reflect the ongoing support families provide to loved ones with a disability. This extended benefit could be renamed the *Child & Youth Disability Benefit*.
- 3) **Simplify approval for the Disability Tax Credit.** As the gateway to the Child Disability Benefit and other financial programs, access to the DTC is crucial. Getting approved for the DTC is particularly difficult for young children, people with an intellectual disability, and people on the autism spectrum. A simplified approval process, without the requirement to reapply, should be introduced for people with disabilities that are lifelong and stable in nature.
- 4) **Support parents to save for retirement.** When a parent is out of the workforce for an extended period of time to care for their child, it has a significant impact on their future financial security. We know a gap exists in retirement savings and investment mechanisms for these families. This gap must be recognized, and a commitment made to explore and test solutions.

Systemic Priorities

- 5) **Undertake a comprehensive review of federal government programs, including:**
 - An analysis of the Disability Tax Credit as the gatekeeper to the Registered Disability Savings Plan (RDSP) and the Child Disability Benefit (CDB).
 - A review of the eligibility criteria for the Home Buyers' Plan and its use by families of people with disabilities.
 - A review of eligibility for the Canada Student Grant and its use by people with disabilities.
 - A review of the way in which funds can be moved between Registered Disability Savings Plans (RDSPs) and Registered Education Savings Plans (RESPs) without compromising grants and bonds.

- 6) **Explore enhancements to the RDSP to support families to save for the future (through grants and bonds) and unlock funds earlier.** Detailed recommendations for these enhancements can be found in [Designing a RDSP Homeownership Plan: Exploring the Canada Disability Savings Program for Homeownership.](#)

- 7) **Reinstate a mechanism to collect disaggregated data about children with disabilities and their families.** This data should allow for analysis based on type of disability.

ⁱ Statistics Canada. [Table 44-10-0012-01 Caregivers receiving financial support from government programs for providing care to family members or friends with a long-term health condition, physical or mental disability or problems related to aging](#)

ⁱⁱ Statistics Canada. [Table 44-10-0013-01 Caregivers receiving federal tax credits for providing care to family members or friends with a long-term health condition, physical or mental disability or problems related to aging](#)

ⁱⁱⁱ Hango, Darcy. 2020. "Support received by caregivers in Canada". *Insights on Canadian Society*. January. Statistics Canada Catalogue no. 75-006-X.

^{iv} Hango, Darcy. 2020. "Support received by caregivers in Canada". *Insights on Canadian Society*. January. Statistics Canada Catalogue no. 75-006-X.



**A
JUST
TRANSITION
IN BC**

leaves no one behind

In every cabinet mandate letter, ministers are asked to deliver results people can see and feel in four key areas. One of those is as follows:

"A sustainable, clean, secure, and fair economy: We will continue our work investing in British Columbians, fighting racism and promoting equity, and building a clean economy that addresses our obligations to combat climate change by driving down emissions, while creating good, family-supporting jobs."

This paragraph closely resembles one of the BC Climate Emergency Campaign's 10 actions, endorsed by over 500 signatory groups from across the province:

"Leave no one behind. Ensure a just transition for fossil fuel workers, resource-dependent communities, and Indigenous and remote communities impacted by fossil fuel production. It will be critical to collaborate in true partnership with Indigenous peoples in climate action. Prepare our communities for the impacts of the climate crisis to minimize human suffering and infrastructure damage. Support those most vulnerable to climate change impacts."

This briefing note and accompanying policy backgrounder elaborates on four areas for provincial action to support people through a just transition. It was prepared by representatives from the Union of BC Indian Chiefs, Poverty Reduction Coalition, Worker's Solidarity Network, Climate Emergency Unit and the Wilderness Committee.

Overarching provincial just transition policies, institutions, and framework

The province needs to adopt an overarching just transition policy that convincingly communicates to workers and communities that, as our society transitions off fossil fuels, no one will be left behind. This policy needs to include guiding principles, a good jobs guarantee, robust financial commitments, and new programs and institutions that, combined, offer hope for economic and employment security in a zero-carbon economy.

- **Advocate** to the federal government for a Just Transition Transfer of at least \$25 billion a year, to be delivered to provincial just transition agencies (and directly to Indigenous Nations).
- **Establish** a just transition agency jointly governed by federal, provincial, Indigenous and municipal governments, with representation from unions, impacted workers, business groups, academia and civil society.
- **Create** a Youth Climate Corps that would offer guaranteed two years of employment and training to anyone aged 35 and younger to work on climate mitigation and adaptation projects in their communities.

Support resource workers and communities in northern BC

Attracting residents and businesses requires people with the right skills and places they want to live. Strategic investments now can power rural economic prosperity and create green jobs through the transition from fossil fuels. But northerners must be involved in planning for the next economy in their region. Provincial officials must start and support that process, while taking care of gas workers and their families.

- **Launch** a community-led process with clear direction and funding commitments which will examine strengths and opportunities across the region, consult economic development experts, engage key stakeholders and identify investment priorities.
- **Invest** in infrastructure and services so northern communities can attract new residents and businesses in low-carbon sectors.
- **Create** good, family-supporting green jobs in ecological restoration and clean energy that work to heal the land and eliminate climate pollution while also supporting reconciliation with Indigenous peoples.
- **Support** unionization within these sectors and ensure job creation is tied to pathways for equity-seeking groups that have been under-represented in the energy sector.
- **Provide** skills training for gas workers to successfully transition to new employment in the event they lose their jobs due to climate policy or declining demand for fossil fuels. Remove as many barriers as possible to this training by providing childcare, transportation, and education in their communities.
- **Support** pension bridging and other financial tools for those who are near the end of their career and wish to retire.

The Rights of Indigenous Peoples and a Just Transition

Indigenous peoples have suffered from historic injustices because of the colonization and dispossession of their lands, territories and resources, thus preventing them from exercising their right to development in accordance with their own needs and interests.

Colonization has created and perpetuated systemic inequities that have, in many cases, made Indigenous communities more vulnerable to the impacts of climate change, more reliant on outdated fossil fuel infrastructure, and economically marginalized and isolated from the rest of British Columbia.

- **Strengthen** First Nations' economic independence by supporting First Nation-led low-carbon economic development initiatives.
- **Improve** the coordination between First Nations', provincial, and federal governments on a just transition from fossil fuels.
- **Maximize** First Nations participation in economic development and employment opportunities arising from the transition to a low-carbon society and align with parallel initiatives to close infrastructure gaps.
- **Recognize** the economic component of First Nations' Title, the right to benefit economically from the use of Indigenous lands and resources.
- **Provide** financial support and incentives to Indigenous communities affected by fossil fuel production to transition to a clean-energy economy.
- **Retrain** Indigenous community members for the roles required for a just transition and work to end the economic isolation of First Nations communities.

Adaptation for the most vulnerable communities

Low-wage workers are at the frontlines of the climate crisis in essential positions that will be impacted first. At the same time, low wage work is often undertaken by racialized, feminized workers, migrant workers and newcomers, and sections of labour that face marginalization on multiple fronts.

- **Introduce** and strengthen income and other supports to help low-income folks through the transition.
- **Establish** a right to cooling and heating for low-income communities, as well as the right to clean drinking water.
- **Retrofit** the existing stock of BC Housing while ensuring vulnerable tenants will continue to be able to afford their rent.
- **Establish**, enforce and provide employer education on basic climate safety standards for workplaces in consultation with low-wage workers including maximum temperature standards, enforced hydration breaks, access to cooling, and evacuation training.
- **Provide** migrant workers a path to permanent residency so their immigration status is not tied to their employer and they will not fear retaliation if they refuse unsafe work.
- **Equip** Indigenous communities with heat pumps and the capacity to maintain them.
- **Promote** climate adaptation for vulnerable communities, including low-wage workers, precarious workers, racialized and feminized workers, unhoused folks.
- **Minimize** human suffering and infrastructure damage, prevention and mitigation strategies for equity-deserving groups such as low-income and unhoused folks, disabled people, racialized folks, low-income workers, renters etc.

Currently, the BC government's approach to just transition leaves much to be desired. BC does not have a clear just transition framework or policy, spelling out its commitments to workers, vulnerable people or communities as we transition our economy off fossil fuels. In the [BCCEC's Progress Report Card on Confronting the Climate Emergency](#), we note that extreme weather events – the heat dome, flooding, wildfires – are disproportionately impacting vulnerable people and communities and deepening inequalities. To minimize human suffering, we must prioritize climate action in ways that promote equity, anti-racism, and social justice; support those that have been directly affected; and implement the Declaration on the Rights of Indigenous Peoples Act. And to prepare for the inevitable end of demand for fossil fuels and transition to clean energy, the province must begin planning as soon as possible.

While the province has made an investment of \$134 million to the CleanBC Communities Fund for local infrastructure projects, it has yet to create a plan to support workers and communities through a managed phase out of fossil fuel extraction. BC has an action plan to implement the Declaration on the Rights of Indigenous Peoples but its application is incoherent and inconsistent, especially when it comes into conflict with resource extraction. Finally, there is no comprehensive plan to support vulnerable communities from the impact of climate change. Our hope is for this briefing note to provide details on what these plans could look like and how they should take shape.

Section one: Overarching provincial just transition framework

The province needs to adopt an overarching just transition policy that convincingly communicates to workers and communities that, as our society transitions off fossil fuels, no one will be left behind. This policy needs to include guiding principles, a good jobs guarantee, robust financial commitments, and new programs and institutions that, combined, offer hope for economic and employment security in a zero-carbon economy.

The framework can take as its starting point the just transition principles identified by the [International Labour Organization](#), [Indigenous Environmental Network](#) and [Just Recovery Network](#), which together emphasize the importance of taking a holistic view of transition. It is necessary but not sufficient for just transition policies to support workers in the fossil fuel industry as they find work in other areas. A just transition must cast a wider net of support, such that no worker or community is left behind, whether or not they are directly implicated in the production of coal, oil or gas.

The CCPA's [Roadmap to a Just Transition](#) offers the following principles:

- Recognition of rights (including Indigenous rights, migrant rights, disability justice, addressing environmental racism, workers' rights / Health and Safety, etc.)
- Participation of affected workers and communities
- Expansion of the social safety net

- Creation of new economic opportunities
- Inclusive workforce development

But the framework must be more than high-level principles. Without significant money to back up the principles in a just transition policy — a substantial investment in the jobs of the future — and transformative new programs, just transition will remain a hollow promise.

The BC government needs to make an audacious and hopeful offer to those workers and communities whose employment and economic security are currently tied to the fossil fuel industry (and to a lesser extent, the auto, steel, concrete and agriculture industries, all of which face substantial transition challenges), to young people setting off on their careers who are deeply anxious about the climate emergency, and to Indigenous communities on the front lines of fossil fuel extraction.

While much of climate policy and new climate infrastructure comes under provincial, municipal and Indigenous jurisdiction, it is the federal government that has the greatest capacity to pay. For this reason, **the BC government should advocate for a new federal Just Transition Transfer (JTT)**. The BC government should also establish a **Youth Climate Corps (YCC)**. These would be transformative programs that communicate that we are indeed entering emergency mode. They would be specifically linked to funding climate infrastructure projects that would create hundreds of thousands of jobs, along with training and apprenticeship programs for young workers and those leaving the oil and gas industry.

As we cease all new fossil fuel infrastructure projects, the JTT and YCC would allow us to tell workers and young people:

“None of you will be out of work. We need your help to meet this moment. Your skills and strength will be deployed building renewable energy projects, retrofitting buildings, renewing existing infrastructure to make it more resilient to extreme weather and managing our forests to reduce wildfire risks in the summers to come.”

A new federal [Climate Emergency Just Transition Transfer](#), in scope and substance, would be close to what is described [here](#).

A new federal JTT should be at least \$25 billion a year (representing about one percent of Canada’s GDP). The transfer’s distribution could be based on a formula linked to recent GHG emissions in each province (but fixed from that point onward, so that it does not perversely incentivize continued high GHGs). However, rather than this transfer money going directly to provincial governments, the funds would go to newly established **just transition agencies** — one in each province and territory — jointly governed by the federal government, provincial/territorial and local governments, and, vitally, Indigenous nations from each province, with civil society representatives too from labour, business and academia/NGOs. Some of the funds should go directly to Indigenous communities. This would ensure the transfer money isn't simply absorbed into provincial budgets or used to displace other infrastructure or training

funds. It would ensure the money is used for its intended purpose. There are already models for a joint structure like this in Canada, such as the Port Authorities. The benefit of structuring the transfer around local just transition agencies (locally governed) is that it provides assurance that the projects undertaken are sensitive to the realities and needs of each locale. Each jurisdiction has its own GHG profile and its own local labour market/training needs and realities. In some jurisdictions, the focus is on fossil fuel workers; in others, the issue is more one of transitioning agriculture or the auto industry. This model would allow for such differences.

There is a long list of worthwhile projects such a transfer could fund. The key is that this transfer would represent *real* dollars for *actual* transition and new jobs (not vague assurances and the historic false promises of just transition). An innovation such as this could be a linchpin within an overall transition plan that is fair and just.

A new [Youth Climate Corps](#), in scope and substance, would be close to what is described [here](#). Ideally, the YCC would be jointly funded by the provincial and federal governments, but the province should be prepared to go it alone and model what a transformative YCC could accomplish. It would be a training and employment program for people 35 and under, empowering them to work within their communities and across the country on low-carbon and climate mitigation work. The program should be open to any young person who wishes to enroll, and would offer two years of meaningful climate work restoring ecosystems, managing forests to reduce wildfire risks, responding to climate disasters and enhancing community resilience/safety, building new climate infrastructure (renewable energy projects, building retrofits, high-speed rail), and engaging in low-carbon care work (elder/childcare).

A YCC would provide opportunities to engage rural and fossil fuel-dependent communities to reimagine a future where youth can stay in their communities to solve local challenges. And at a time when many communities wrestle with the future prospects for their youth, and when many young people are wrestling with climate anxiety and mental health, the YCC could be just the hopeful solution to captivate people's excitement.

Section two: Supporting resource communities through transition

Northern B.C., particularly the Peace Region, must be prepared for significant changes in the coming decades as the province works to meet its climate commitments and the world seeks to limit its use of fossil fuels. While there are obvious challenges in navigating this transition for workers and communities who currently rely on the gas industry, there are also enormous opportunities in the emerging green economy that require targeted supports to take advantage of. From ecological restoration and renewable energy to outdoor recreation and remote work, there are countless ways northern communities can build on their strengths to create vibrant economies if the right funding and policy frameworks are there to support them.

Workers and communities must be at the table to make sure this transition is successful, but without leadership from the provincial government showing why a transition plan is necessary, there's no effective place to start that conversation. We need the premier and cabinet to

demonstrate that planning for transition is in everyone's best interest and that they are prepared to offer the investments and policies needed to make it a success. Only once there is buy-in — or at least acceptance — from the people who will be most impacted by this transition can the work begin to determine what a future without fossil fuels looks like on the ground.

Step one is for the provincial government to engage all relevant stakeholders in northern B.C. in an honest conversation about the necessity of planning for a world that no longer needs or wants fossil fuels. While there is room for debate about the timeline, it should be clear by now that this is inevitable and the sooner the province starts preparing the better. Few spaces exist for the kind of cross-sectoral collaboration necessary to develop an economic vision for the region that does not rely on fossil fuel exports. Provincial leaders should use their convening power to bring together workers, First Nations, unions, municipalities, regional districts, chambers of commerce and academics based on their interests in the region's long-term sustainability. This must accompany a shift in messaging from false solutions like carbon capture to the opportunity this transition provides northerners to reimagine their role in the province's economy.

Once such a group or groups assemble, they should be resourced and tasked to develop regional plans for thriving green economies that build off existing strengths and take advantage of emerging opportunities. This would necessarily involve hiring experts to evaluate business cases and propose economic development plans. For example, an expanded version of the province's Northeast Roundtable might look at the abundance of clean energy in the region and propose a plan for a fiber optic cable to connect new data centres to the world or a high voltage transmission line from the Peace Region to Edmonton to help the city replace its fossil fuel electricity. Its counterpart in the northwest might devise a strategy to encourage retirees in the south to relocate to the region by building affordable seniors' homes, strengthening healthcare services and running advertisements in Vancouver and Victoria. Local workforce skills can also be considered an asset: thousands of people in northeast BC who work for drilling companies make it a prime location for a nascent geothermal industry.

These plans should identify the policy frameworks and provincial investments that are necessary for their success. Whether it's infrastructure, services, human resources, amenities or legislation, any community economic development plan will have factors that enable it to succeed. Maybe a proposed wild mushroom co-op needs a processing and distribution facility or the many artisans across the region need a provincial web portal to market their work to a global audience. This process should result in a list of funding priorities for the provincial government and an estimate of the costs associated with transitioning northern B.C. to a sustainable economy. It should involve credible assessments of the potential for various projects to bring new residents, businesses and economic activity into the region. Finally, it must actually come with sustained funding for northern priorities. This could be delivered through the Northern Development Initiative Trust, or a similar regional body focused on the transition away from polluting industries.

Income security must be available for workers in the gas industry to make it possible to go back to school, maintain the same housing or plan for retirement. For the government to put an end

date on the gas industry, it must assure workers they will be taken care of. In Spain, coal workers were given access to early retirement and green jobs skills training. That should provide a model for B.C. to support workers through this transition. Education programs should be offered in the communities where the gas industry operates or online wherever possible, so people don't have to uproot their lives to go back to school. They also should receive payments to cover mortgages, childcare or other expenses during this time. Older workers could be offered early retirement and potentially increased old age security to make up for lost earning potential.

Northern B.C. has a bright future ahead of it even as the province and the world abandon the gas industry, but it will take careful planning and community buy-in to get there. The sooner this effort gets underway, the better off workers and communities across the region will be. Provincial officials need to show leadership in getting started while also supporting northerners to chart their own future without fossil fuels.

Section three: A just transition for Indigenous Peoples

Colonization has created and perpetuated systemic inequities that have, in many cases, made First Nations communities more vulnerable to the impacts of climate change, more reliant on outdated fossil fuel infrastructure, and economically marginalised and isolated from the rest of the province. The parallel responsibilities of the Crown, to uphold the rights of Indigenous peoples and to reduce greenhouse gas emissions to mitigate climate change, present countless opportunities to partner with Indigenous peoples on shared initiatives that fulfill both obligations.

Relative to other jurisdictions in North America, First Nations are not major emitters of greenhouse gases and do not share equitably in the short-term economic benefits of the fossil fuel economy. Yet First Nations continually demonstrate the willingness to reduce their own emissions, despite:

- the economic disadvantages from historic and ongoing denial of Aboriginal Title and systemic exclusion from the wealth accumulated from First Nations territories,
- a lack of institutional support for the unique challenges stemming from jurisdictional gaps around Indian reserves and the provision of services to First Nations people, and
- inadequate trilateral coordination between First Nations', provincial, and federal governments on climate change mitigation and adaptation issues.

In fact, First Nations in British Columbia have identified [enhanced ambition](#) for emissions reduction measures as an urgent climate action requiring attention from First Nations, British Columbia, and Canada. As well, the BC Climate Solutions Council's [2022 report](#) emphasized the need to work with First Nations "in oil and gas producing regions to identify and advance economic diversification opportunities and seek federal collaboration and funding to support this transition."

Unlike fossil fuel companies, First Nations that are actively involved in oil and gas development are responsible to their citizens. As well, in most cases, they have had their land-bases and economic activities limited by a colonial government for several generations – the economic lifeline of oil and gas has served the purpose of reversing some of the economic stagnation of colonization.

Strengthen First Nations economic independence by supporting First Nation-led low-carbon economic development initiatives and expedite transition away from fossil fuels

Clean energy generation projects can have high overhead and are not always economical in the short term especially compared to the avoided cost of diesel in remote and non-integrated areas that remain diesel dependent.

- Provide baseline resources and capacity for Nations to develop their own priorities and strategies with respect to the development of their territories and resources.
- Provide capacity to engage with the regulatory bureaucracy for project approvals and funding for emissions reduction initiatives, including: clean energy projects, housing and building retrofits, and transportation.
- Create or improve institutional processes within ministries to bring relevant decision-makers together from the provincial and federal governments to support First Nations' just transition initiatives
- Facilitate equitable and transparent resource revenue sharing with First Nations
- Provide financial supports for First Nations impacted by oil and gas production to transition to clean energy

The Rights of Indigenous Peoples, Jurisdiction, and Climate Change

The governments of British Columbia and Canada have both passed legislation committing to aligning their laws with the *United Nations Declaration on the Rights of Indigenous Peoples*, a human rights instrument to recognize the minimum standards for the survival, dignity, and well-being of Indigenous peoples. British Columbia is the only province in Canada in which both levels of Crown government have made commitments to do so – implementing a just transition in partnership with First Nations in BC is one way to demonstrate how meeting the minimum standards of recognizing Indigenous rights leads to greater certainty in large-scale economic planning, not less.

- Align important climate change legislation and regulations with the *UN Declaration* to ensure that First Nations have their rightful say in how the resources in their territories are utilized

Section four: Adaptation for most vulnerable communities

Communities that face forms of systematic disadvantages and barriers on the basis of, but not limited to, race, class, gender identity and expression, sexuality, immigration status and so on; are at the same time the communities most vulnerable to the effects of climate change. These intersections of identity do not exist in isolation. Many individuals and communities face overlapping forms of discrimination and inequity. For example, low-wage work is often undertaken by racialized and feminized workers who face marginalization on multiple fronts including living in precarious housing situations or experiencing limited access to food security.

Ecological challenges disproportionately impact the burden of mortality and morbidity on certain groups (such as racialized, gendered groups, as well as groups already facing other forms of marginalization), and the ongoing social, environmental, access, and income inequality in our societies leads to poorer health and inequities that are unnecessary, unfair and can be remediated by creating a more equitable distribution of societal wealth. We know that people most impacted by climate change are those who are already systematically disadvantaged by poverty, inequality, systemic racism, and colonialism. Many of the marginalized groups we need to center in this work are often exposed to unique climate change impacts such as coastal erosion, flooding, changes in the availability and accessibility of traditional resources and seasonal activities, and extreme weather events.

For example, the prevalence of primarily racialized, and feminized migrant workers performing essential work in key industries, in domestic and health care settings, in the agricultural sector and food supply chain, and supporting businesses in various industries, including restaurants and hospitality, trucking, and construction cannot be overstated. Yet migrants do not have the same level of protection as most labour due to immigration status, conditions enforced upon by temporary foreign worker programs, lack of access to resources or lack of knowledge on how to navigate resources and workplace complaints.

Consider the challenges faced by temporary foreign workers (TFWs) who form the backbone of many of these sectors. In 2021 alone, 103,830 work permits were issued to migrant workers under the TFWP across Canada, who overwhelmingly faced multiple forms of abuse and exploitation.¹ These industries are already vulnerable to crisis, as demonstrated by the COVID-19 pandemic, and will be at the front line of any climate emergency. Temporary foreign workers working in agriculture and the food sector are liable to be impacted by extreme weather, flooding, extreme heat, and other extreme climate events. TFWs will be the first to face and be forced to work under dangerous conditions and there needs to be mechanisms to ensure that they are not working under climate emergencies and have easy access to justice and safeguards that they currently lack.

Another example is the case of unhoused folk. Unhoused folk are also at the very front lines of climate impact, as many unhoused folks rely on public space, which is increasingly being

¹ [A Promise of Protection? An assessment of IRCC Decision-making Under the Vulnerable Open Work Permit Program](#)

privatized, and do not have safe access to shelter during extreme weather events. Risks such as sanitization barriers, health impacts of extreme weather such as smoke inhalation or heat injury, and food and water insecurity are already extremely high for this group. Even now, for instance, cold weather shelters are inadequate for the needs of unhoused people. A just transition must include truly affordable, and accessible housing options for people who are experiencing homelessness, in safe, adequate, and affordable permanent homes.

Disabled people are also at the frontlines of the climate crisis, and often have barriers to responding. When wildfires, flooding, heat domes, and other emergency climate events happen, people with disabilities are often impacted in unique ways. For example, people with chronic illnesses and underlying conditions are deeply impacted by smoke inhalation, may rely on the supply chain for life-sustaining medication, or are uniquely susceptible to heat impacts due to the medications they are on. For years, [research has shown](#) that in emergency contexts, disabled people are significantly more likely to suffer morbidity and mortality. During the heat dome, for example, people with schizophrenia were [four times more likely](#) to die². There is not much available data in BC about the experiences of people with disabilities, as disaggregated data doesn't currently exist, but disabled people's unique needs need to be understood, prioritized, and centered as we move towards a just transition.

A just transition needs to pay particular attention to these communities as social, environmental, class and income inequality already lead to poorer health, inequities, and marginalization; issues that will be exacerbated by the ongoing climate crisis and need special attention to mitigate. In addition, ensuring that measures are in place to address current and future inequities faced by vulnerable communities due to the climate crisis creates “buy-in” to a just transition program, prevents the human and economic cost of climate disasters, and begins to build economic resilience and independence in these communities that begin to address inequities.

To minimize human suffering and infrastructure damage, it is necessary to consider prevention and mitigation strategies for equity-deserving groups such as low-income and unhoused folks, disabled people, racialized folks, low-income workers, and renters. Here, we propose income support through the transition, adequate climate infrastructure, and equipping Indigenous communities with heat pumps and the capacity to maintain them.

- a. **Income supports to help marginalized groups through the transition**
 - i. We know that low-income people, families, and communities are already facing severe impacts from existing climate changes, including extreme weather events. These impacts can be mitigated and prevented with strong, robust income equality support for folks experiencing poverty.
 - ii. Prioritize poverty reduction strategies and economic security measures that specifically target those who have a higher risk of living in poverty due to intersectional disadvantage. This includes women, single senior women, single parents, low-wage workers, BIPOC communities,

² [B.C.'s climate adaptation disability crisis – Briarpatch Magazine](#)

immigrants, and refugees, those engaged in survival sex work and other work in grey economies, LGBTQIA2S+ individuals, those living with disabilities (taking into consideration the diverse needs of those with short, intermittent, and long-term disability needs), those with mental health barriers, people who use drugs, and others. As outlined above, many of these groups overlap, and the impacts of robust prevention strategies will resonate beyond one specific group or community.

- iii. The current rates for income and disability assistance remain well below the poverty line and need to be raised to *at the very least* the Market Basket Measure, and must be connected to inflation so as to keep rates current to the cost of living realities.
- iv. Additional income supports, such as the recommendations from the [Basic Income Panel Report](#)³ should also be considered to build justice into a just transition. These recommendations include:
 1. Generally available basic services addressing unmet basic needs, like extended health and rental housing assistance;
 2. Targeted programs that combine cash transfers with wraparound social support for groups in transition, like youth aging out of care and women fleeing violence, and those facing high barriers to employment, who have more specific needs;
 3. Targeted basic incomes where they are most helpful, such as for people with disabilities and youth aging out of care;
 4. An overhaul of the Disability Assistance system, including for those with mental health and addiction issues, that emphasizes dignity and support for work for those who want it;
 5. A reformed Temporary Assistance program, providing monetary benefits in a dignified and respectful way to those able to work and better facilitating the transition to employment;
 6. Alongside other targeted measures such as extended health benefits for low-income groups, adjustments to taxation for the working poor, and other regulatory reforms as outlined in the recommendations.
- v. Increasing the earnings exemptions for those on income and disability assistance and ending the claw backs of unearned income will allow people to be more equipped with the economic resiliency to navigate the changing climate and reduce human suffering. These income supports will also help prevent the impact of food insecurity, as many people cannot afford the increasing cost of food, which has also been impacted by such climate disasters as the atmospheric river and associated flooding in November, 2021.
- vi. Paid leave policies:
 1. Adequate paid sick leave is a necessary right that must be accessible to all, regardless of employment status or immigration

³ [BC Basic Income Panel](#)

status. The current gap in legislated protections has contributed to deeper worker vulnerability as many risk their economic security and employment security to take care of their physical and mental health.

2. In addition, we are calling for an amendment to the Employment Standards Act that would guarantee paid leave for workers at risk of wage loss owing to extreme weather events. Given the precarious nature of low-wage employment, workers often feel unable to refuse unsafe working conditions.

b. Climate infrastructure for equity-seeking groups

Right to cooling and heating:

- i. During the heat dome of June 2021, 619 people died because of heat injury and its' impacts⁴. The majority of the people who suffered or lost their lives were elderly people, disabled people, and low-income people, and “Most decedents were in homes *without adequate cooling systems* such as air conditioners or fans”⁵. [The Coroner's Inquiry report](#) following these deaths recommended “Identifying and supporting populations most at risk of dying during extreme heat emergencies” as a critical priority.
- ii. This also includes looking at a review of “issuing cooling devices as medical equipment accessible to persons most at risk of dying during an extreme heat event and making public the findings of the review”. Issuing cooling devices to people who are experiencing poverty is absolutely essential in preventing suffering and mitigating the harms of heat. Programs in jurisdictions that experienced the heat dome, such as the [PCEF Heat Response Program](#) provide low-income folks with portable heating and cooling units and devices.
- iii. The issue of energy affordability is also tied to a Just Transition for BC. Energy unaffordability, or energy poverty, impacts many Indigenous, low income, rural, and disabled communities and families across BC. The [2022 Joint Submission to the Energy Affordability Working Group](#) has clear recommendations on steps governments can take to address this urgent issue. A credible long-term strategy for addressing energy affordability in BC is needed and should be developed in tandem with and support of a Just Transition.
- iv. The BC government must also work closely with health authorities, municipalities, and Indigenous Nations to resource cooling, heating, and disaster mitigation strategies that work for local communities, informed by lived experiences of people who are most impacted by extreme weather

⁴[Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021](#)

⁵[Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021](#)

events. This includes low-income people, who are more likely to be living in heat-impacted neighbourhoods⁶.

- v. Resources, materials, and extreme weather warnings must be available in accessible formats, be multilingual, and direct outreach needs to happen to address the digital divide, as many unhoused people do not have access to the internet, devices, or digital literacy that equip them with the tools to receive this information solely from virtual formats.
 1. Covid-19 magnified the digital divide in BC and this divide disproportionately impacts low-income people, elders, and Indigenous communities: “44 percent of people in lower income households – and 53 percent of people in very low-income households – face one or more barriers to using the Internet, compared with only 18 percent of people in moderate to high income households.”⁷
 2. [We also call on the provincial government to provide \\$10-a-month internet for people living below the poverty line, and those accessing education in BC.](#) The internet and digital information have become increasingly important in accessing safety information during climate disasters, and equipping people now with tools to access those resources is of utmost importance.

c. Retrofit the existing stock of BC Housing:

A just transition that creates sustainable green jobs will ensure vulnerable tenants will be able to continue to afford the rent for retrofitted housing. The Coroner’s report recommended that the “BC Building Code incorporates both passive and active cooling requirements in new housing construction and that the release of the Alterations Code for Energy Efficient, Resilient Buildings explicitly identifies both passive and active cooling standards for existing home renovation⁸”; however existing buildings, especially those that house low-income residents, need to be retrofitted to support renters’ rights to “adequate housing”, as laid out in the National Housing Strategy, and International Human Rights laws. Supports for multi-unit buildings, SRO’s, shelter and transition housing, supportive housing, BC housing buildings, and other housing that low-income people access need funding for energy efficient retrofits to both to protect them from climate emergencies, and simultaneously reduce energy impacts of inefficient systems that rely on fossil fuels and non-renewable energy.

d. Labour standards:

⁶ [Here's who lives in your city's worst heat islands | Radio-Canada.ca](#)

⁷ [One-on-one help needed to achieve digital equity | Legal Aid BC](#)

⁸ [Extreme Heat and Human Mortality: A Review of Heat-Related Deaths in B.C. in Summer 2021](#)

The Government needs good-faith consultation efforts with low-wage workers to determine other basic safety measures they can carry. Industries with precarious workers need basic protective measures and sectoral bargaining. For example, migrant workers need a viable pathway to receive permanent residency not tied to their employer or employment status to ensure they are able to seek and receive protection without fear of retaliation. To improve social equity during environmental emergencies, we are calling for:

1. Maximum temperature policies in the workplace
2. Enforced breaks for hydration
3. Accessible cooling centres
4. Adequate evacuation training
5. Provision of personal protective equipment
6. Well-coordinated communication channels
7. Free public transit in urban areas, as well as inter-community public transit options. Many workers are forced to commute to and from work in dangerous conditions with little compensation.

Through knowledge campaigns, and government advertisement campaigns, as well as accountability and enforcement, offices can provide protection and restitution for workers.

- e. **Equipping Indigenous communities with heat pumps and the capacity to maintain them:** Provide resources and subsidies to low-income households to improve energy efficiency, install electric heat pumps, household-level solar and other renewable energy sources. [Heiltsuk Nation's clean energy conversion efforts put rest of B.C. to shame | Canada's National Observer: News & Analysis](#)

We urge you to take bold, strong, progressive action to tackle the urgent climate crisis while ensuring that lower-income and vulnerable households are not made worse off, and that social justice and economic security is enhanced. Implementing a framework that incorporates redistribution of income and wealth and the broader provision of more equitably accessible public services would facilitate the realization of much-reduced poverty, unemployment, and homelessness as well as a more equitable, balanced, thriving economy, a sustainable environment, a healthier population, an excellent standard of living, quality of life and a better-functioning democracy.

Another thing that is clear is that with the speed and intensity of anticipated climate shifts, **ensuring proper mitigation is put in place to prevent currently non-precarious communities from falling into precarity is essential in planning for BC.** There are communities not currently precarious that may fall into precarity as extreme weather conditions worsen, and without proper safeguards in place, entire demographics may become vulnerable overnight. The government needs to be prepared for rapid response to deal with emergencies as they arise. Consider the towns of Lytton and Princeton, where flooding displaced entire populations that were previously housed and secure - with residents needing urgent housing.

These situations will occur more and more, and the government cannot wait until it happens to formulate responses - response plans need to be in place, with proactive rather than reactive measures and strategies in place. This means ensuring that government is aware of what communities might be impacted by the climate crisis and be ready to respond. Low-wage, essential work in sectors like food service, retail, and hospitality remain precarious and largely unprotected sites of employment. These industries are highly gendered and racialized where workers have limited bargaining power and often tolerate workplace mistreatment as part of the precarious worker culture. In already-precarious industries and compounded with the climate emergency, low-wage workers are more vulnerable than before. Enforceable climate-specific measures are necessary to ensure low-wage, essential workers are no longer susceptible to the health and safety detriments of climate disasters.

Finally, there are many clear, preventative mitigation measures and policy approaches that the BC government can take to the ends of prioritizing and centering groups that disproportionately experience the impacts of climate change that will lead to a reduction in human suffering as well as infrastructure harms and damages. The measures we have outlined are just a start but indicate many ways in which we need to be proactively thinking about, and building in support and protections for groups who experience material disadvantages in our communities. We also know that these measures can build in some support for groups and communities that may easily shift into precarious situations as climate change worsens. We also call on the BC government to take an inter-ministerial, collaborative approach. Finally, we urge you to begin meaningful, ongoing, and collaborative engagement with people with lived experiences of marginalization and who are most likely to experience impacts to better understand from these groups what strategies can assist them in resourcing these communities for what we know will be devastating, ongoing impacts as climate change and extreme weather events continue to increase in frequency, intensity, and duration.

Conclusion

A grand global transition off fossil fuels is coming; demand for BC's gas will fall. The only question is whether the transition will be managed and just, or whether it will leave some workers and communities on the scrap heap of history, like so many previous industrial revolutions. We have before us a chance not only to ensure employment security but to also insulate lower-income people and Indigenous and rural communities from the scourge of rising energy prices. Instead of forking over ever-rising monthly costs to fossil fuel companies, a genuine just transition can provide energy independence and sovereignty for Indigenous communities and protection from energy poverty for vulnerable people.

Resources

[BCCEC's Progress Report Card on Confronting the Climate Emergency](#)

[Guidelines International Labour Organization Guidelines for a just transition](#)

[Indigenous Principles of Just Transition](#)

[Roadmap to a Canadian Just Transition Act](#)

[Voices and Vision of Northern British Columbia](#)

[Canada needs a new federal Climate Emergency Just Transition Transfer](#)



Living in
Community

**Living in Community Submission to
TogetherBC: BC's Poverty Reduction Strategy, Five Year Review**

info@livingincommunity.ca

April 2023



On behalf of Living in Community, we are writing to offer recommendations to update TogetherBC: B.C.'s Poverty Reduction Strategy.

Background

Living in Community (LIC) is a provincial non-profit organization based in Vancouver. Centering sex workers' rights, Living in Community convenes diverse stakeholders in order to: understand a range of experiences and perspectives; inform sex work-related policies and practices of governments, service providers, and community organizations; and provide education and training to support these goals. We focus on root causes of issues including colonization, capitalism, criminalization, racism, and discrimination that create systemic vulnerability for sex workers, and we seek to build understanding and common ground with other community members.

LIC also facilitates the BC Sex Work Support Service Network, a group of twenty-five organizations that provide frontline services, supports, and advocacy with and for sex workers in their communities. Network members are located in every region across British Columbia as well as in the Yukon. The Network meets regularly to share best practices, learn from each other, and strengthen our unified voice for sex workers' rights across BC.

Sex work and poverty

For the vast majority of sex workers, the number one reason for selling or trading sexual services is the simple need to earn a living to meet one's daily needs. However, poverty – especially generational poverty – is a strong push factor that can cause some people to turn to selling or trading sex, even if it's the last thing they want to be doing.¹ Survival sex work is defined as a consistent inability to refuse sex work in dangerous circumstances due to financial desperation, and this can contribute to increased violence against sex workers as they end up seeing riskier clients in order to make ends meet.

Living in Community envisions a world where everyone is free to make choices about how best to support themselves financially. We believe that sex workers, even those currently living in poverty or in difficult situations, are making the best choices for themselves given their circumstances, and we support everyone's autonomy to do so. However, poverty severely limits peoples' access to options, making sex work an uncomfortable last choice for some. Working in sex work should be a choice that consenting adults are free to make, not a last resort due to poverty, criminalization, and other systemic factors.

Aside from survival sex work, some sex workers choose to supplement their employment income or disability or income assistance payments by doing sex work. Especially with the recent historic levels of inflation, both paid employment and government assistance levels are often too low to make ends meet with one income stream or assistance program alone. Sex workers in this situation are often left with pervasive anxiety about whether to report their sex

¹ McCarthy, B., Benoit, C., & Jansson, M. (2014). Sex work: A comparative study. *Archives of sexual behavior*, 43, 1379-1390.

work income to governments as they have justifiable concerns about onerous clawbacks, in addition to concerns about privacy, stigma, and criminalization. Increasing the earning exemptions for people on assistance would help alleviate these concerns and ensure a fairer system for sex workers and others patching together a living through multiple income streams.

However, at the moment, income and disability rates remain below the poverty line and do not allow people to live in dignity. As a result, many sex workers rely on support from community organizations and spend time away from work to line up for meals or services. Being poor can sometimes be a full-time job.

Recent developments in the cost of living

Inflation, particularly for groceries, means that individuals must stretch an already meagre income or disability assistance payment even further. Thus, poverty frequently leads to food insecurity for sex workers. A 2019 study from the Gender and Sexual Health Initiative found that of 761 cisgender and transgender women sex workers surveyed in Metro Vancouver, 72.4% were food insecure over the study period. Over a third identified as Indigenous and a quarter were of a gender or sexual minority.² In response, sex work support organizations have stepped in to help fill the food gap by offering meal programs, particularly during the COVID-19 pandemic when these needs intensified and many other community organizations were closed.

The pandemic also caused extreme financial hardship for many sex workers. Their source of income was cut off, and they were not able to rely on income supports such as CERB, EI, or the BC Emergency Benefit because they did not qualify. Many also struggled to access community services because frontline organizations had to reduce their services and hours. In addition, sex workers cannot access coverage under the employment protections that other workers have access to, such as employment standards regulations, occupational health and safety standards, or the ability to unionize or work collectively. This all contributes to the poverty that many sex workers experience.

Poverty is an ever-present pressure in the lives of some sex workers, and financial desperation can lead to sex workers engaging with riskier clients and riskier behaviours simply to get by. Thus, poverty, financial desperation, and violence are inextricably linked in the lives of many BC sex workers.

² Barreto, D., Shoveller, J., Braschel, M., Duff, P., & Shannon, K. (2019). The effect of violence and intersecting structural inequities on high rates of food insecurity among marginalized sex workers in a Canadian setting. *Journal of urban health*, 96, 605-615.

Recommendations

We echo the following recommendations made by the BC Poverty Reduction Coalition, of which we are also a member:

1. Raise social and disability income assistance rates to the poverty line.

Social and disability income assistance rates are insufficient for people to live on in dignity. This leaves many people on income assistance with few options except to turn to grey economy activities, such as sex work, to help make ends meet. No one should be living below the poverty line and be forced to do any type of work they may not want to in order to survive.

We further recommend increasing the earning exemptions for people on assistance such that sex workers are not penalized for making ends meet with additional work when assistance rates are too low.

2. Address discrimination and stigma by adding social condition to the BC Human Rights Code.

All sex workers are stigmatized, often either as criminals or as victims. Street-based sex workers, who remain the most visible, are most heavily stigmatized both for their participation in sex work and for being poor. This leads to discrimination based on social condition by police and the criminal justice system, in addition to other institutions. Many BIPOC and LGBTQ2S sex workers face intersecting oppressions as well.

Everyone, no matter their social condition, deserves to be treated with dignity and respect. Adding social condition to the BC Human Rights Code will create a mechanism to address this discrimination and will empower poor people.

3. Accelerate a massive expansion of affordable non-market housing.

Many street-based sex workers are homeless, underhoused, or are living in substandard housing that is unsanitary, infested with vermin, and unsafe, particularly for women. For sex workers, being able to bring a client into their own space is far safer than doing sex work on the street, and yet many sex workers live in housing where there are guest bans; this means they are forced to work on the streets where there is more danger. Some individuals may be trading sex simply to have a place to sleep overnight in circumstances where they can exercise little choice. Other sex workers may be couch-surfing or staying in shelters where rates of sexual assault is very high.

The housing crisis in BC is immense and will require real commitment to ensuring that everyone has safe and dignified housing, but it can be done.

4. Make public transit fare-free and create a publicly owned inter-city or inter-regional bus service.

We hear from the BC Sex Work Support Services Network frequently about women trading sex for a ride, especially in northern BC. Given the many disappearances of women, particularly Indigenous women, along Highway 16, this is very concerning to us. Bus service in rural areas is insufficient to the need and can sometimes be cost prohibitive for people living in poverty.

A free bus system between cities and communities would allow people to travel safely without trading sex as the only option for some to obtain transportation.

Conclusion

While many individuals freely and enthusiastically work in sex work, poverty acts as a push factor that leads some people to engage in sex work as a last resort. Ideally, all individuals should be free to choose to engage in sex work out of a range of employment options to which they have access. Being forced by circumstances beyond one's control to engage in sex work leaves these individuals more vulnerable to violence and exploitation.

We echo the above recommendations of the BC Poverty Reduction Coalition as these actions would best support lifting sex workers out of poverty. We draw particular attention to the recommendation to raise the income and disability rates to at least the poverty rate to immediately improve the lives of sex workers living in poverty.

Sex work is heavily criminalized in Canada by federal laws, and sex workers must contend with this heavy burden as well. While the provincial government cannot change the federal laws, it has significant opportunity to increase the safety and dignity of those working in the sex industry through ensuring that provincial laws and policies provide for an adequate minimum standard of living for all, such that everyone is able to freely choose the work they engage in.

Submission to the BC Government review of the TogetherBC poverty reduction plan

1. Introduction

This submission focuses on how the BC Government can tackle the issue of working poverty by taking steps to increase wages and lower the cost of living.

In a province as diverse as BC, communities differ when it comes to their cost of living. For example, while some communities may have lower housing or child care costs, others may have lower-cost public transit or easier access to goods and services.

No matter where they live, families should be able to afford a decent life. There are jobs that need to be done in every community, and therefore people need homes, services, and a good quality of life in every community.

Poverty is not inevitable - it is a policy choice, not an individual choice; a poverty-free BC is possible.

1.1 About Living Wage for Families BC

Our goal is for every working British Columbian to make a living wage.

The living wage is the hourly amount that each of two working parents with two young children must earn to meet their basic expenses (including rent, child care, food and transportation) once government taxes, credits, deductions and subsidies are taken into account. It is a barebones budget that does not include debt repayment or savings for future plans.

Living Wage for Families BC works with CCPA-BC and community groups across the province to calculate local living wage rates. We certify employers that pay a living wage to their staff and contractors. There are over 400 Living Wage Employers across the province, including non-profits, small and large businesses and municipalities. Finally, we advocate for complementary government policies that would help families make ends meet – to both lift wages and lower the cost of living.

Living Wage for Families BC is a program of Vancity Community Foundation.

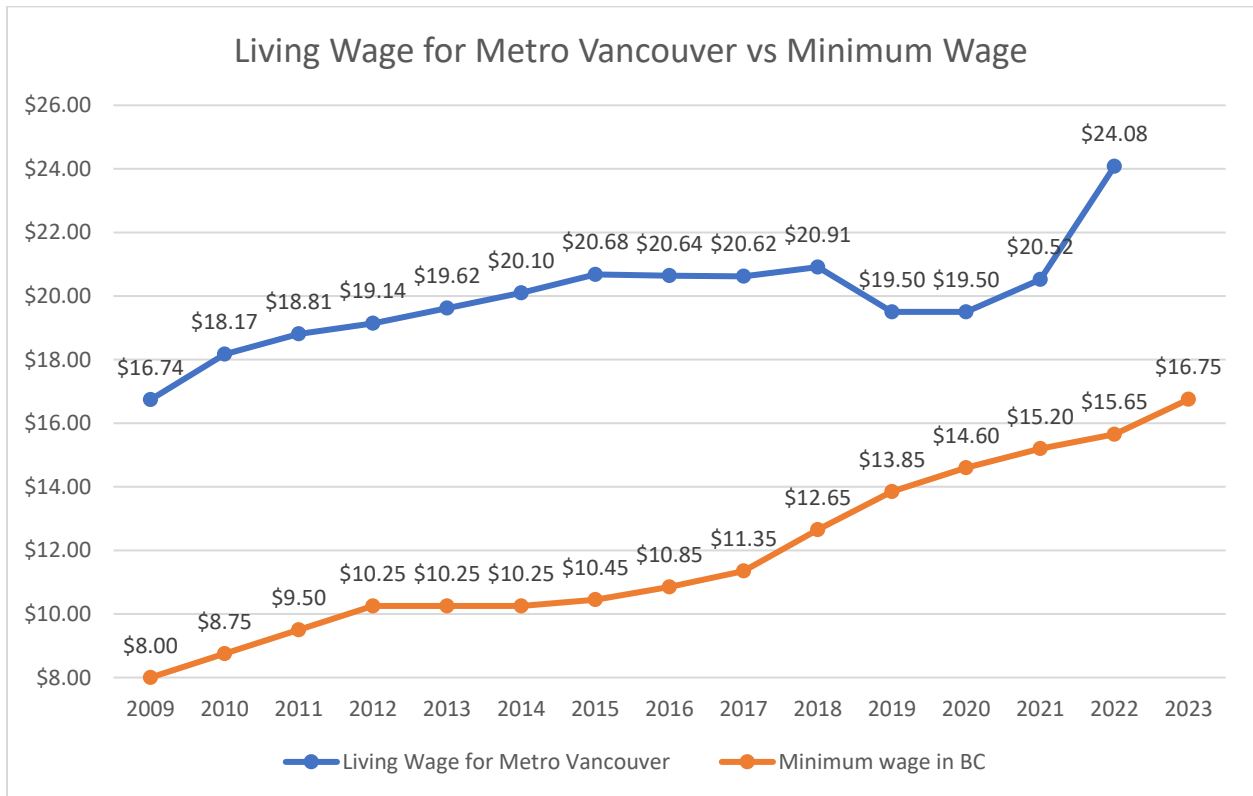


1.2 TogetherBC and the power of public policy

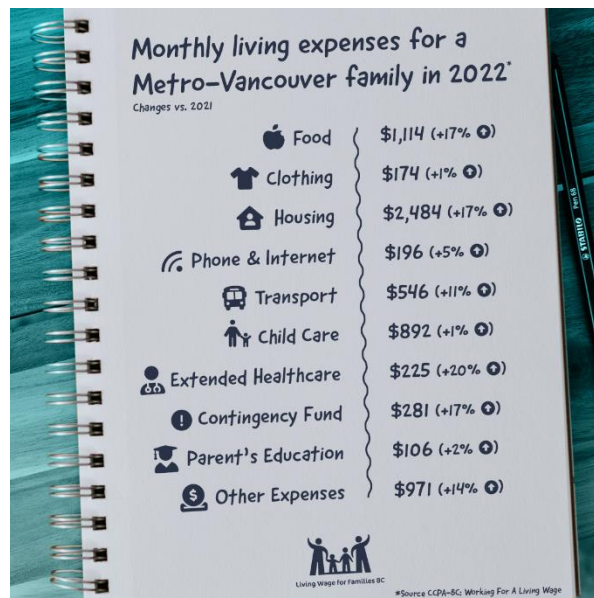
The introduction of the TogetherBC Poverty Reduction Strategy in 2019 marked a significant policy shift in BC.

Overall, the Strategy was well-designed, taking a comprehensive, cross-government approach and setting targets with timelines for reducing overall poverty rates in the province.

The Strategy was accompanied by a suite of welcome policy changes – notably, the BC Child Opportunity Benefit (now called the BC Family Benefit), scheduled increases to the minimum wage, significant investments in child care, some new investments in affordable housing, and several long-overdue changes to the rules for accessing social and disability assistance. These changes all helped lower the living wage in 2019.



However, in recent years the increased cost of living (in particular of the two essentials of rent and food), has meant that the living wage has increased to \$24.08 an hour in Vancouver and \$24.29 an hour in Greater Victoria. The gap between the minimum wage has grown to over \$7.00 an hour for these communities.



2. Recommendations for change

2.1 Lift the income of low wage workers

- 1.) A staged plan to bring the minimum wage up to the current living wage for Metro-Vancouver over a 3-year period
- 2.) Minimum wage laws apply to all workers (including those in the gig economy and piece workers). Address the misclassification of workers as independent contractors to improve access to the minimum wage and other labour legislation to support precarious workers.
- 3.) Implement a living wage policy for all provincial government direct and contracted staff.
- 4.) Government to introduce pay equity legislation and introduce an anti-racism act to address systemic discrimination
- 5.) Improved services at the Employment Standards Branch including education and proactive enforcement for workers who experience wage theft including not earning a minimum wage but should be, unpaid hours, refusal to pay overtime, and taking tips. The ESB should also have targeted enforcement teams at ESB to ensure that International Students and migrant workers aren't being exploited.

2.2 Help lower the living wage by implementing policies to make life more affordable

Budget items	% of total expenses	Recommendation to lower costs for families
Food	16%	Develop plans to address the growing issue of food insecurity and unaffordability, and this should include actions to prevent price gouging and to ensure that consumers are paying fair prices for food"
Shelter	36%	Implement vacancy control for renters and build more affordable housing stock.

Phone and Internet	3%	<p>Expand the Telus low income internet access for \$10 per month program</p> <p>Increase internet availability for all rural communities in BC</p>
Transportation	8%	<p>Implement the All On Board Campaign's recommendation of a sliding scale monthly transit pass for adults based on their income</p> <p>Increase transit availability in rural areas so that families don't have to own a second vehicle</p>
Other Household Expenses	14%	Maintain the lift to the BC family benefit
Child Care	14%	<p>Continue with the roll out of \$10 a day child care</p> <p>Ensure that there is an availability of child care spaces for all communities across BC</p>
Non MSP Health Expenses	3%	Expand the provincial health plan to include dental care, optometry, paramedical care, and enhanced pharmacare
Contingency Fund	4%	Lobby the federal government to make improvements to the EI program to improve access, address gender gaps and raise benefit rates, so that if someone has to take time off, the EI system will support them.
Parent Education	2%	Replace student loans with grants, ensure equity in costs for domestic and international students, and commit more funding to the provincial open textbook program

3. Conclusion

It's worth noting that many of these recommendations are focused on helping those who are experiencing working poverty. However, they shouldn't be the only policies considered. There are many groups of people experiencing poverty who cannot work because of their age or health, and we fully endorse and support the excellent recommendations from groups such as the Poverty Reduction Coalition for how to help end poverty for everyone in British Columbia.

People in poverty face impossible choices: buy food or heat the house, fill a prescription or pay the rent. And with the rising cost of living, these choices are getting starker by the day. But poverty is not just an issue for low-wage workers and their families. We all pay a price for poverty in BC. It weakens local economics and increases costs for public services.

By implementing these recommendations, we can create safer, healthier communities for everyone.

Thank you very much for the opportunity to submit for the Poverty Reduction Strategy's first review - and we look forward to seeing what next steps are taken to achieve BC's poverty reduction and eradication goals.

Further Information

Please contact Anastasia French, Provincial Manager, Living Wage for Families BC
Anastasia_french@vancity.com, 236-558-2635



Loblaw in British Columbia



More than **265** stores and more than **22,700** employees.



More than **230** pharmacies and more than **500** full-time pharmacists.

Loblaw Companies Limited

Loblaw Companies Limited ("Loblaw" or the "Company") is Canada's food and pharmacy leader, operating Canada's best retail network with stores within 10 kilometres of 90% of Canadians. We proudly offer innovative e-commerce services as well as Canada's top control brand portfolio, and we are a trusted health and wellness partner to millions nationwide.

From coast to coast, our community-based network of approximately 220,000 colleagues and employees in more than 2,400 corporate and independently operated stores and pharmacies provides customers with various services, including grocery, health and wellness, beauty, apparel, general merchandise, wireless mobile and financial products and services - many with digital elements designed specifically to meet the needs of consumers and underpinned by the PC Optimum™ loyalty program.

We are guided by our company purpose – helping Canadians Live Life Well®. Three simple, but powerful words that represent our promise to our customers, colleagues and Canadians. We exist to help people live the life they want to live, as well as they can. Underpinned by our CORE values, this purpose comes to life across our five divisions: Market, Discount, Shoppers Drug Mart, Joe Fresh, and PC Financial.



In 2020, President's Choice Children's Charity reached over **63,000** children in British Columbia with good food and the skills to grow and cook, including over **14,000** students during the school day - wherever they were learning during the pandemic.

3 Distribution Centres



Over **1.3 million** kilograms of food donated in the province of British Columbia in 2020.



In 2020, the LOVE YOU by Shoppers Drug Mart program proudly granted over **\$1.1 million** to help fund women's health organizations across the province.



In 2020, Loblaw purchased over **\$180 million** of produce from local British Columbia growers.

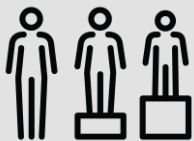
We are getting down to work on our ESG goals. Today, there is a call to action on two areas that matter most and where we can have the biggest impact.



Fighting Climate Change

Climate change is the greatest threat to our planet and to our families. Extreme weather continues to offer early signs of catastrophic change. The UN's recent Intergovernmental Panel on Climate Change report tells us our world is burning and humans are to blame. Immediate action is required.

To fight climate change Loblaw will reduce emissions associated with our business to net zero by 2040, eliminate food waste sent to landfill, and tackle plastic waste.



Advancing Social Equity

The effects of inequity are evident around us: people continue to experience discrimination based on their race, culture, gender, sexual orientation and disabilities; and, families face barriers to food and good health.

To do our part, we are making Loblaw a more representative workforce at leadership levels and creating a culture of empathy and inclusion by training our nationwide workforce of 200,000 Canadians in communities big and small. We are supporting women's health, fighting childhood hunger and enhancing our community investment programs to help make a bigger difference for Canadians.

What we're doing across Canada: Our goal to Feed More Families will see 1 billion pounds of food go to those who need it by 2028

- **Partnerships:** We work with Food Banks Canada and Second Harvest to distribute surplus food across the country, including perishable and non-perishable items.
- **Product:** We bring hundreds of thousands of pounds of fresh, frozen and non-perishable foods to those in need every week through our retail food recovery program.
- **Matching:** The food banks that are matched with our grocery banner stores have a means to transport and store frozen and refrigerated food.

Results: Since 2009, our stores have raised over \$30 million in cash donations and 27 million pounds of food for local food banks through our national food drive campaigns



Our BC Opportunity: We have a unique opportunity to leverage our supply chain to deliver food donated by Loblaw to remote communities in Northern BC



Loblaw donates over 1 million kilograms of food per year in BC.

Our supply team colleagues are key to ensuring that our robust supply chain maintains food on shelves across the province.

Loblaw Opportunity: Explore possibility of connecting our distribution network to communities most in need, via direct linkages with specific communities or regional food charity partners

With your guidance, we can explore the potential of connecting our distribution network with communities in need along our existing supply chain routes

Our ask: the BC government to connect Loblaw directly with communities in need and local and regional food charity organizations

Quesnel

Vanderhoof

Williams Lake

Burns Lake

Terrace

Smithers

Kitimat

Prince George

Haida Gwaii

MOSAIC Poverty Reduction Engagement Response

Incorporated in 1976, MOSAIC provides holistic services to immigrants and refugees offering settlement, employment, language, health promotion, and interpretation and translation supports. MOSAIC's mandate is to support and empower immigrant and refugee communities to address critical issues in their neighborhoods and workplaces. In the comments that follow, the focus is on immigrant communities who are low income/living in poverty. It is important to note that immigrants are not a homogenous group and enter the country in a multitude of pathways and different economic classes and contribute meaningfully to Canada and its economy.

Below are MOSAIC's thoughts on the questions posed by the Ministry.

1. What are the main factors contributing to poverty in your community today? What groups are most affected and why?

Factors impacting newcomer communities are similar to those in non-immigrant communities including high cost of living such as food, gas, housing and medication but include some complicating factors that are unique to this demographic such as language barriers, discrimination and lack of knowledge around systems navigation that can further contribute to poverty.

Some immigrants arrive in the country with employment while many do not – unemployment as well as precarious and entry survival jobs contribute to poverty amongst immigrant communities. There are many barriers that inhibit newcomers finding stable employment including language skills, credential recognition, lack of child care, discrimination etc. This is further complicated by lack of culturally responsive mental health supports for immigrants – many of whom arrive with trauma. Without proper supports they are often unable to participate in employment opportunities. Untreated mental health issues can also have long-term impacts on adults as well as youth which can lead to substance use – further exacerbating poverty issues. Poverty and untreated adverse mental health conditions can negatively impact the family unit. There has been an increase of newcomer children in government care over the last few years. According to MCFD, 40% of youth who exit the care system, experience homelessness.

Groups affected by the factors mentioned above are vast, and include seniors, single parent households, all income assistance recipients including people with disabilities, newcomer youth, and newcomers with large families. This is due to incomes not being sufficient to cover the cost of living and meet basic needs. Housing for large families is a challenge as income vs rent vs house size are not in alignment leading to newcomers having to choose between food,

dignified housing or other expenses. This housing precarity places newcomers at risk for abuse from landlords.

2. How have events since 2019 (e.g. COVID-19, inflation, climate change, etc.) impacted people in poverty in your community?

Many immigrant communities continue to struggle post 2019 and covid. There is an increase in demand for settlement services and immigrants who need complex supports as there are more increases of families breaking up, domestic violence, complex mental health issues including substance abuse, depression and general anxiety. Many are slow to return to pre-pandemic social groups and have lost interest in connecting with their community.

Some immigrants lost jobs during the pandemic and were slow to recover. Inflation has left many newcomers struggling to make ends meet making them food insecure and increasing reliance on food banks. Events since 2019 have significantly impacted mental health of vulnerable immigrant communities with the impacts of social isolation still felt.

According to the UNHCR, the number of displaced people globally has reached an all-time high of over 100 million. Climate change is a contributing factor to this and will continue to impact immigration numbers in Canada as people come into the country through regular and irregular pathways. MOSAIC supports the Canada's commitments to welcome immigrants and refugees and we have concerns about limited resources available such as mental health supports and housing availability.

3. The 2017/2018 engagement process showed us that we needed the following changes, which we have made:
 - Annual increases to the minimum wage
 - Increases to income assistance and disability assistance rates
 - Housing affordability measures
 - Eliminating interest on B.C. student loans
 - Removing Medical Services Plan premiums, among others
 - Which of these or other changes has had the biggest impact, and how?

Although helpful, these changes have had no significant impact on communities we serve in poverty as they have not kept up with the cost of inflation and made no immediate impact on our communities to find dignified affordable housing. Of the above listed measures the one with the biggest impact has been removing MSP premiums.

4. What additional changes could the B.C. government make that would have the biggest impact in addressing poverty and why? What should we do first?

- Housing Related:
 - The cap for accessing rental assistance should be raised to include individuals between mid-class and low income (e.g. 50K); The rental coverage should cover the current rent rate in the market
 - Individuals accessing income assistance including people with disability should qualify for rental subsidies
 - It is important to note that BC Housing is a help but does not meet the need. It also causes issues with staff and clients as the waitlists are long and there is no clear rationale as to who gets in, when and why.
- Employment Related:
 - Intensive English language learning programs that can lead to a free skills training for newcomer.
 - Incentivize learning English for individuals accessing income assistance e.g.
 - Culturally responsive counseling and mental health support for newcomers
 - Engage newcomer youth in leadership and free skills training along with counseling support.
 - Provide youth free access recreational activities
- Tax Related:
 - Increase the allowable income tax credit that matches the rise in cost of living.
 - Change in tax system to incorporate portion of rent paying at private market as tax credit.
 - Government control rise in essential utility costs – e.g. water, hydro, Gas etc.
 -

5. How can we help people learn about and access the supports that are available for them?

Many immigrant communities have their own social media platforms or media outlets that could be utilized to provide information. Settlement agencies are a constant source of information for immigrant communities on supports available to them and how to access them. The government could help by supporting newcomers to get connected to agencies and to provide training/information sessions on supports or changes to them. AMSSA in BC is the umbrella organisation for all settlement agencies.

6. What are your top 3 priorities for addressing poverty over the next five years? Over the longer-term?

Immediate:

- Addressing the housing crisis – this is a constant issue with majority of immigrant communities we serve. There is a need for increase availability of affordable housing for single people, safe housing for LBGQTQ+ newcomer communities, seniors and large families. With the demand for housing being so high, newcomers become vulnerable to abuse and scams.
- Lowering the cost of food

- Free Intensive English language and employment skills training for newcomers (for example there used to be Intensive Arabic focused employment/language programs but they do not exist anymore)

Longer Term:

- Address underlying issues of poverty such as mental health issues, substance use, and training/education
- Handle poverty reduction at a national level assisting newcomers



April 24, 2023



Ministry of Social Development & Poverty Reduction
908 Pandora Ave
Victoria, BC V8V 3P3

Attention: Minister Sheila Malcolmson

Dear Minister Malcolmson,

Please accept this letter as Nelson Community Food Centre's contribution to the update of the Provincial Poverty Reduction Strategy, *TogetherBC*.

The Nelson Community Food Centre (NCFC) is located in Nelson BC. Our vision is a thriving community where people come together around good food for all. Our mission is to create opportunities for people facing adversity to share, connect and advocate around good food. We achieve our mission through four main programs: our Good Food Bank, Food Skills, Garden and Harvest Rescue. NCFC is a proud member of Community Food Centres Canada and is one of 16 Community Food Centres throughout the country. As of April 1, 2023, NCFC is also the West Kootenay Regional Community Food Hub for the United Way of BC's Provincial Food Security Initiative.

Nelson Community Food Centre serves those who are facing adversity and are low-income, and offers inclusive programming free from means-testing. Participants report income through part-time work, disability assistance, government pension or social assistance. 48% of survey respondents in 2022 identified as having a disability. The majority of our participants are above the age of 45, with 20% being seniors, aged 65+. Indigenous and racialized peoples are over-represented in our programming compared to demographic data for Nelson.

In 2022, Nelson Community Food Centre served a total of 19,522 household members (not unique visitors) through 102 sessions of our Good Food Bank, grew 673 lbs of fresh, organic produce through our Garden program, and gleaned 915 lbs of local fruit from local fruit trees through Harvest Rescue with the support of 9 staff and 2,157 volunteer hours. Through our good work, participants report that NCFC is an important source of food and that they feel like they belong to a community. Participants also report improvements to their physical and mental health as a result of our programming.

At the Nelson Community Food Centre, we believe that food insecurity is not a food issue, but an income issue. As such, we are involved in poverty reduction work at the national, provincial and local levels including acting as Chair and delivery partner for *Together Nelson*, Nelson's poverty reduction strategy and initiative, for Year 2 (2023-24).

Our recommendations for the updated *TogetherBC* strategy are to:

- 1) **Raise Provincial disability assistance rates.** In a recent survey, 55% of NCFC respondents identified as having a disability and 26% of total respondents received disability assistance. NCFC would like to see efforts to raise disability assistance payments to keep pace with the increased cost of living, in line with recent efforts to raise the minimum wage which is tagged to inflation. We applaud the \$125 increase in accommodation support announced in *Budget 2023*, and would encourage the Province to increase disability rates so that they are closer to actual living costs and are relevant in these times of high inflation and food costs.
- 2) **Support implementation of the Canada Disability Benefit by aligning it with provincial disability support.** The federal government is in the legislative process of finalizing Bill C-22, which would create a disability benefit through the federal tax system. NCFC has been advocating for the passing of Bill C-22 with our partner, Community Food Centres Canada, and hopes that the Provincial Government, through the Ministry of Social Development and Poverty Reduction, will do all it can to provide pathways for those receiving provincial disability assistance to be eligible for and easily access the upcoming federal benefit. We also recommend that the federal disability benefit be implemented with no negative impact to those already receiving provincial disability assistance (e.g., no clawbacks to provincial disability support).
- 3) **Continue employment programs for those facing multiple barriers to employment.** NCFC appreciates the implementation of employment programs for those experiencing barriers to employment such as the Single Parent Employment Initiative and the BC Work Experience Opportunities Grant. NCFC was able to hire 5 people to fill 8 positions who faced barriers to employment through the BC Work Experience Opportunities Grant in 2021 and 2022. This program allowed us to employ people whom we serve and see the direct impact of supportive employment and increased income on those employees' lives. One employee was able to purchase an e-bike, get dental work and optical care. We are discouraged by the lack of BC Work Experience Opportunities Grant for 2023, but hope that it or another program like it will be available in the future.
- 4) **Support employers in becoming certified Living Wage employers.** Nelson Community Food Centre became a certified Living Wage employer in 2022, one of 5 current Living Wage employers in Nelson, BC. The living wage in Nelson is \$20.83/h, while the updated minimum wage for June 1, 2023 will be \$16.75/h. We encourage the Province to provide incentives to employers across BC to become Living Wage employers and to address the gap between the minimum and living wage across the Province.
- 5) **Continue to support food access programs throughout the province,** including those that move beyond the traditional charitable Food Bank model. We are extremely heartened by the Province's recent announcement of a \$200 million investment towards food security initiatives and a \$214 million investment towards school food programs. We encourage the Province to

continue supporting food access programs that move beyond the Food Bank model, which can be stigmatizing to use and which may not be attractive to the growing number of working poor who require food access assistance. We also encourage the Province to keep precise data on food insecurity in BC and to create sustainable funding programs for organizations involved in food security initiatives.

- 6) **Continue to support affordable housing in Nelson and throughout the Province.** We are encouraged by the Province's new housing plan, *Homes for People*, and are especially eager to see more affordable housing development as a priority within the plan. The annual renters' incentive of \$400 will have an impact on our participants as will the development of more homes and supports for people experiencing or at risk of homelessness. We support the Province's efforts to create new housing and to create any initiatives that would decrease the proportion of income that British Columbians spend on housing.
- 7) **Increase transportation support for those with a low income.** Lack of affordable and accessible transportation is a major issue in Nelson and the West Kootenay. Participants at NCFC travel from around the region to access our services and the BC Transit system in Nelson and the West Kootenay is far from robust. While our participants make use of the Low-Income Seniors and Disability Passes for BC Transit, many are earning an income and don't qualify for those transportation supports. We recommend that the Province explore expanding transportation support for people who are low-income, along with increasing service in the West Kootenay area that allows people to more regularly access employment opportunities, community services and amenities.

We understand that the Ministry of Social Development and Poverty Reduction does not work in isolation and that its work is inextricably linked to the work of other Ministries, such as the Ministries of Housing, Finance, Agriculture & Food, and the Ministry of Health, as well as other levels of government. We would like to see continued inter-Ministry engagement to improve the lives of British Columbians in the updated *TogetherBC* plan and look forward to seeing the impact of this work.

We appreciate the opportunity to contribute to the update of *TogetherBC* and are available to support this work in any way possible. Thank you for your consideration of our recommendations and we look forward to seeing the results.

Sincerely,



Jessica Chant
Executive Director



P'nina Shames
NCFC Board Co-Chair



Kady Hunter
NCFC Board Co-Chair

Organizational Submission- BC Poverty Reduction Strategy

About Women Transforming Cities

Women Transforming Cities (WTC) is a feminist, grassroots non-profit based in Vancouver. We build the participation and power at the local government level of people historically excluded from civic processes and decision-making to radically shift power to gender-marginalized people through a feminist, intersectional lens.

In 2022, we conducted deep community engagement to understand the priority issues for under-represented and marginalized communities and what is required for them to feel a sense of belonging in Vancouver. The findings from this engagement have informed the recommendations included in this submission.

Equity-deserving genders are disproportionately impacted by poverty in BC.

One in five people who identify as non-binary live in poverty¹ and single female seniors have higher rates of poverty than single male seniors.² Trans and gender non conforming people face greater susceptibility to poverty due to their vulnerability to violence, discrimination, and a lack of safe spaces.³ Further, it is crucial that BC's poverty reduction strategy acknowledges that invisible poverty is not reflected in the already alarming statistical data.

The intersectionality of poverty

The application of an intersectional lens is required to understand the causes and consequences of poverty. Intersectionality recognizes individuals as multi-dimensional and existing at the intersection of different identities such as class, age, religion, race, culture, income, and gender, among others. It refutes the efficacy of a one size fits all approach to policy responses and dialogue.

Poverty statistics indicate a disproportionate impact on the basis of identities, such as sex, gender, race, and immigration status. However, statistics do not fully represent the experiences of equity-deserving groups due to limits on extracting intersectional findings. For example, we know that women in BC have higher poverty rates than men⁴, implying that policy interventions should target women. However, this statistic does not consider the implications of colonialism, racism, or ableism that some women experience.

¹ Census in Brief: Disaggregated Trends in Poverty from the 2021 Census of Population

<https://www12.statcan.gc.ca/census-recensement/2021/as-sa/98-200-x/2021009/98-200-x2021009-eng.pdf>

² Gender-Based Analysis Plus (GBA+) and Intersectionality: Overview, an Enhanced Framework, and a British Columbia Case Study (p. 16)

https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Gender_Based_Analysis_Plus_GBA_and_Intersectionality_Overview_an_Enhanced_Framework_and_a_British_Columbia_Case_Study.pdf

³ Poverty Reduction in Trans, Non-Binary & Two Spirit Communities: A Summary Report for the British Columbia Ministry of Social Development and Poverty

<https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/poverty-reduction-strategy/2020-trans-plus-report.pdf>

⁴ Statistics Canada. Table 11-10-0135-02 Percentage of persons in low income by sex

Thus, policies such as increasing minimum wage can be useful but may fail to adequately support the policy's targeted groups. For example, people with disabilities are overrepresented in current statistics showcasing deep poverty⁵ and may face additional barriers to employment. Precursory support may be required before they can fully take advantage of the elevation of minimum wage policy change.

People living at the intersections of multiple equity-deserving groups are the most susceptible to poverty and have the least supports. Poverty reduction strategies and the measures of progress must use an intersectional framework to ensure the needs of those made most marginalized are met.

Recommendations

Address violence against Missing and Murdered Indigenous, Women, Girls and Two Spirit People.

- Combatting gender-based violence against MMIWG2S is critical to reducing poverty in BC. MMIWG2S are disproportionately impacted by gender-based violence in Canada, due to ongoing colonial inequities and systemic discrimination and racism. Indigenous women are more likely to be murdered,⁶ and in BC, at least 65% of Indigenous women have been victims of violence in their lifetime.⁷
- Determinants of gender-based violence include a lack of affordable housing and lack of safe spaces. This means that poverty reduction must take a comprehensive approach to address intertwined realities of poverty.
- The National Inquiry into MMIWG has listed several Calls for Justice, including 30 for all levels of government, to help end violence.⁸ We recommend BC's implement a poverty reduction strategy that includes actions that fulfill these Calls, thereby ensuring that the intersectional needs of Indigenous women and girls are met.

Implement vacancy control across BC to advance poverty reduction by increasing housing affordability.

- Introducing vacancy control in BC will be a significant step toward reducing poverty across the province. Residents across BC face housing challenges, especially in the City of

⁵ Building Understanding: The First Report of the National Advisory Council on Poverty (Chapter 3) <https://www.canada.ca/en/employment-social-development/programs/poverty-reduction/national-advisory-council/reports/2020-annual.html>

⁶ Native Women's Association of Canada. (n.d.) MMIWG Fact Sheet. <https://nwac.ca/assets-knowledge-centre/Fact-Sheet-MMIWG-1.pdf>

⁷ Statistics Canada. (2022). Violent victimization and perceptions of safety: Experiences of First Nations, Métis and Inuit women in Canada. <https://www150.statcan.gc.ca/n1/pub/85-002-x/2022001/article/00004-eng.htm>

⁸ National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019). Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls. <https://www.mmiwg-ffada.ca/final-report/>

Vancouver. Low housing affordability contributes to the vulnerability of low-income residents, those in precarious work situations, and those already facing housing instability.

- In WTC's community survey, 80% of residents indicated that housing was the most critical issue to them during the 2022 municipal elections.
- The lack of vacancy control in BC means that when tenants vacate a unit—including upon eviction and renovation—landlords can raise rent as much as they like. According to CMHC's 2023 Market Rental Report, asking rents for vacant units in Vancouver are 43% higher than rents for occupied units.⁹
- Low-income and long-term tenants are particularly at-risk in the absence of vacancy control as landlords have financial incentive to evict them. Vacancy control would alleviate the eviction incentive and thereby maintain greater affordability for units across the province.

Invest in free or reduced transit fare programs to significantly reduce cost pressures for residents living in poverty.

- Improving public transit accessibility and affordability will be instrumental to poverty reduction in BC. Transit costs are a considerable financial burden, especially for households in large cities¹⁰, which further impacts housing options and affordability.¹¹ In addition, transit influences the safety of Indigenous women, non-binary individuals, unhoused residents, and sex workers.¹² Free and reduced transit fare is especially important now due to inflation and the effect of the COVID-19 pandemic on low-income communities.
- Programs to reduce the burden of transit costs have shown significant success in improving access to employment, education, and community services while also enhancing safety for vulnerable individuals.^{13&14}
- This includes the City of Vancouver's Reduced Fare Transit Pilot and Greater Victoria's Low-Income Transit Assistance Program, which has existed in the region since 1997. The BC Bus Pass Program has also assisted seniors and people with disabilities. Additional efforts to reduce fare for all low-income individuals is urgently needed.

⁹ Canadian Mortgage and Housing Corporation. (2023). Housing Market Information: Rental Market Report. <https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/housing-markets-data-and-research/market-reports/rental-market-report/rental-market-report-2022-en.pdf?rev=8eb3acc0-89b3-49d1-a518-0a381f97b942>

¹⁰ Statistics Canada (2018). Survey of Household Spending, 2017 <https://www150.statcan.gc.ca/n1/daily-quotidien/181212/dq181212a-eng.htm>

¹¹ Metro Vancouver. (2015). Housing and transport cost burden in Metro Vancouver. <http://www.metrovancouver.org/services/regional-planning/PlanningPublications/HousingAndTransportCostBurdenReport2015.pdf>

¹² Schwan, K., Versteegh, A., Perri, M., Caplan, R., Baig, K., Dej, E., Jenkinson, J., Brais, H., Eiboff, F., & Pahlevan Chaleshtari, T. (2020). Chapter 12: Transportation im: The State of Women's Housing Need & Homelessness in Canada: A Literature Review. Hache, A., Nelson, A., Kratochvil, E., & Malenfant, J. (Eds). Toronto, ON: Canadian Observatory on Homelessness Press. <https://womenshomelessness.ca/wp-content/uploads/State-of-Womens-Homelessness-Literature-Review.pdf>

¹³ Tamarack Institute. (2022). City of Vancouver Reduced-Fare Transit Pilot: Benefits Beyond Cost. <https://www.tamarackcommunity.ca/hubfs/Case-study-City-of-Vancouver-reduced-fare-transit-pilot-benefits-beyond-cost.pdf>

¹⁴ Community Council. Low-Income Transit Assistance Program. <https://communitycouncil.ca/low-income-transit-assistance-program/>

- WTC's community surveys also indicate there is a need to eliminate barriers to accessing existing and future transit rebate programs, such as bureaucracy, lack of digital access, and language barriers.

Expand the frequency and coverage area of transit service to improve transit accessibility and equity.

- Public transportation is a lifeline for many low-income communities as it enables access to employment, healthcare, education, healthy food, childcare, and recreational activities that may not be readily available in their neighbourhoods. People living in places with less or no transit service, such as rural and remote areas, have less access to these needed resources.
- Bolstering transit access and equity is critical to poverty reduction as it enables individuals and families living in poverty to take advantage of services that will improve their livability.

Invest in alternative models of community safety to not exacerbate systemic inequalities

- Ensuring community safety is crucial, but interventions must not exacerbate systemic inequalities and poverty. Criminalizing poverty perpetuates this cycle and contributes to systemic inequality. Therefore, it's essential to prioritize alternative safety models that address poverty's root causes, provide access to basic needs, and leverage community knowledge and values to tackle safety issues effectively.
- Given that policing has failed in multiple aspects of community safety, and disproportionately targets Black and Indigenous communities for criminalization,¹⁵ we recommend divesting from policing and investing in community-led alternatives. This includes non-policing crisis management, mental health interventions, and social support programs determined by those who are criminalized, such as sex workers, people who use illicit drugs, people experiencing mental health challenges, and Indigenous, racialized and low-income people.
- We strongly advocate initiatives that uphold the rights of unhoused individuals, prioritize peer-led solutions, and promote safety for all individuals regardless of their housing situation. By enhancing and increasing access to community, health, social, and peer-based approaches, the BC government can help improve residents' sense of safety and belonging.

¹⁵ Canadian Civil Liberties Association. (2021). Rethinking Community Safety: A Step Forward for Toronto (Report No. 12).
<https://ccla.org/wp-content/uploads/2021/07/Rethinking-Community-Safety-A-Step-Forward-For-Toronto-Full-Report-12.pdf>

Pivot Legal Society's submission to the Ministry of Social Development and Poverty Reduction

RECOMMENDATIONS FOR MSDPR'S 5-YEAR REVIEW OF THE BC POVERTY REDUCTION STRATEGY

Submitted: April 26, 2023

Brief and Background

Pivot Legal Society is a human rights-based legal organization in the Downtown Eastside of Vancouver BC, located on the stolen lands of the unceded territories of the Coast Salish people, including the x^wməθk^wəyəm (Musqueam Indian Band), Sk^wxwú7mesh (Squamish Nation), and səliłwətał (Tsleil-Waututh Nation). Our mandate is to use the law to address the root causes of poverty and social exclusion.

We are submitting feedback as an organization to the Ministry of Social Development and Poverty Reduction ('MSDPR', 'the Ministry') for the Ministry's 2023 five-year review of BC's Poverty Reduction Strategy. We are also a member of the BC Poverty Reduction Coalition and were invited to submit feedback on their policy brief to the Ministry. We support their policy brief. On March 21, 2023, we hosted a community consultation with members of the Our Homes Can't Wait coalition at Pivot Legal Society to review the BCPRC's policy brief with nine people belonging to the 13 key population groups. With the recommendations that emerged from that consultation, we are making our own submission to the Ministry. These recommendations come from a diverse group of Black, Indigenous, racialized, and white people with lived and living experiences of poverty, active substance use, disabilities, and many other identities and characteristics, who are currently receiving or have accessed at some point in their lives a form of income and/or social assistance. The group reviewed and discussed five of the six of the MSDPR's priorities together, and also named their own priorities for the province's poverty reduction strategy, informed by their own personal lived experiences with poverty.

Priorities of the Group Outside of the MSDPR's Six Key Priority Areas

1. Social Inclusion and Belonging

To increase social belonging for people who live in poverty, the community consultation group recommends the creation of what they term 'Neighbourhood Community Liaison Teams', comprised entirely of people living in poverty in BC. These types of teams could oversee the construction of new housing in their neighbourhoods and host meetings for people who live in those neighbourhoods to provide input on what health and social services would be beneficial to include in those new buildings.

The group also named that civic engagement is not accessible to people living in poverty; for example, going to city hall meetings for public zoning hearings is a barrier due to time and financial constraints, as well as the stigma and discrimination that their communities face from other attendees of public zoning meetings. The group's suggested alternative for public town hall meetings is going to a place hosted in their neighbourhood by the Neighbourhood Community Liaison Teams, which would be a lower barrier place for local community members to share their ideas and opinions on issues that impact them. Another benefit of this initiative would be the creation of local jobs within their own communities for people with low or no incomes who do not engage in the traditional economy.

2. Funding Poverty Reduction

The community consultation group recommends new ways of funding poverty reduction in the province, including stopping cycles of criminalization for people who live in poverty by eliminating interactions between people and the criminal justice system, as well as reducing the number of police officers working in BC, including municipal police forces, RCMP contracted police forces, and transit police, and instead re-investing the resources gained into the poverty reduction strategies mentioned in this brief within the key priorities areas.

3. Legislated Human Rights Protections - Social Condition

Legislative protections are also recommended by the group to address discrimination and stigma, namely through the addition of a person's social condition as a protected characteristic under the BC *Human Rights Code*.

One member of the group raised that communities which are highly stigmatized would stand to benefit the most from legislated amendments to protect a person's social condition. For example, requirements to show proof of income when applying for housing or tenancy create enormous barriers for people who do sex work or who participate in the grey economy, also known as the survival economy. Sex workers experience discrimination, surveillance, and harassment on the part of landlords and housing providers, and these practices can force sex workers to accept risky clients or work in unknown, hidden, and dangerous settings. Discrimination based on a person's social condition, which includes a person's occupation, is not currently protected under the BC Human Rights Code, but from the experiences detailed above we can see that a social condition protection is necessary to eliminating discrimination for people who have stigmatized and criminalized forms of income generation.

Based on the personal experiences of the community consultation members, they have also experienced discrimination based on their social condition when applying for work. They explained that they are turned down for jobs when their prospective employers find out which postal code the applicants live in. In this way, protecting social condition against discrimination would reduce employment barriers for people who live in neighbourhoods where the majority of residents have low incomes and are highly stigmatized. Reducing stigma for people who live in poverty with an amendment to the *Human Rights Code* will meet the Ministry's identified priority to increase social belonging.

4. Free, Accessible Public Transit

The group recommends that the province make public transit fare-free and create a publicly-owned intercity or inter-regional bus service. They discussed that under the current system, there should not be additional fares when transferring from the bus to Skytrain or Canada Line for the obvious cost-saving reasons, and because many of them have ended up being fined and criminalized for not being able to afford multiple fares for bus and train fares for one trip. They also discussed solutions to this, such as the creation of 'Places of

Convenience', as they termed it, those being places that people living in poverty visit frequently to which they can travel at no cost.

Aside from creating a free transit system, the group also named that transit should be as accessible to people in rural areas across the province as it is in metropolitan areas. Buses should be running 24 hours a day, seven days a week, and they should run more frequently. One member shared having to wait for a bus in a rural town in BC that ran only once every three hours. Other members named BC's infamous 'Highway of Tears' and how free and accessible transit along that highway would have saved the lives of hundreds of Indigenous women, and the creation of which would prevent further tragedy from occurring.

Safety enhancing and poverty reduction measures were also discussed, aimed at de-criminalizing people who can't afford to take transit. As they said, "No cops in schools, no cops on transit!"

Community Consultation Recommendations for Five of the Six Key Priority Areas of the Province's Poverty Reduction Strategy

Recommendation for Housing: Accelerate a massive expansion of affordable non-market housing

The group emphasized that language is a powerful tool that can be used to influence ideas one way or another, depending on who is using it and why. They highlighted that the word 'affordable' is subjective and will mean different things to people in different income brackets. The group strongly recommends that the MSDPR provide clarification on what 'affordable' and 'low-income' means in their planning for the updated Poverty Reduction Strategy. Additionally, the requirement for people to prove that they have a 'low income' or that they require 'affordable' housing were named as processes that create situations where people can end up revealing personal information about themselves that can result in criminalization, for example, when a prospective tenant might have to admit that they use illicit drugs or engage in the survival economy, which are generally criminalized forms of income generation, to pay their rent.

They discussed that the expansion of 'shelter-rate' and 'pension-rate' housing would be the clearest way to achieve 'affordable' housing, and that the cost of housing should be tied to the benefits being provided by income assistance. For example, a person on income assistance can earn \$6,000 per year, and if they were forced to rent their housing at market rate housing prices, averaging \$2,000 per month in Vancouver, they would run out of their entire year's finances within 3 months.

Tactics for resisting the current state of the housing crisis also came up in conversations, where one Indigenous member of the community consultation asked, "If the homes on E. Hastings St. [in Vancouver] were Tipis, would they have torn them down?" Another responded, "If we could build tiny homes, we'd dare them to tear them down!" Other potential solutions arose from the group as well, such as the creation of Neighbourhood Community Liaison Teams discussed above, to oversee the construction of new housing, which could also host meetings for the people who already live in the neighbourhood to have input on what health and social amenities could be included in the new buildings that would be beneficial to them. The group also discussed that for the duration of their lives, residential school survivors and survivors of the 60s Scoop should have guaranteed housing, which does not have to be on reserve.

In the context of the types of housing that government plans to create to house communities of varying income brackets, the group's thoughts are below as direct quotes:

"I've been taught that we're all one nation, but some nations have been [expletive] over 10 times more than us."

“Some people should get housing: Is this the same right for everyone? We don’t need to classify people as more deserving. We should recognize that things have happened to certain people, and it’s up to the government to house them. Some people are not getting a fair shake, so there should be more equality for that issue. Everyone has the same right to housing. You didn’t suffer enough shouldn’t be the test. They want to pit people against each other.”

“Equal right to housing is good but equitable housing is important too. Why do we have to compete against each other?”

“They got rid of segregation of men and women. Get rid of all that. Treat everyone equal with a place to live.”

Recommendation for Education: Provide access to free or substantially subsidized post-secondary education for people living in poverty

Members of the group discussed how employment options in BC for people who do not have a post-secondary education are very limited, and these training and education opportunities should be expanded outside of the trades, should include peer work and peer support work, and should include the option to attend post-secondary school for free or with substantially subsidized rates.

Recommendation for Employment: Provide more opportunities for peer work

As mentioned above, the community consultation group had their own creative ideas for providing employment opportunities to people who live in poverty. Government and businesses should provide more opportunities for people to engage in peer work and peer support work because this form of work is more accessible to people who have barriers to engaging in the economy in traditional ways, for example because they cannot afford to obtain a post-secondary education which would result in job opportunities in higher income brackets. Along these lines, there should be systems in place so that peer workers can access free and low-barrier mental health supports so that they can maintain their health and long-term employment.

Recommendation for Income Supports: Implement the BC Basic Income Panel’s roadmap for transforming the province’s income support system

The group asserts that it is a must to raise social and disability assistance rates to the poverty line, at least, if not to bring them higher than the poverty line, and that the BC Basic Income Panel’s roadmap should be implemented in BC. The welfare wall was also discussed, and the group had several recommendations to address it. They recommend raising the amount exempted on earned income for people who receive any form of income assistance; providing a variety of payment options for income assistance payments, including e-transfers; that identification issues and barriers be resolved for accessing and receiving pay from employers when people don’t have a way to verify their identity, and that banks should play a role in reducing barriers for people who have limited access to technology and means for identifying themselves when receiving payment for work that they have done.

In terms of barriers in applying for income assistance, the group mentioned that it is very difficult to do so as there are a variety of applications to complete and departments to go through. They labeled this as ‘guided misdirection’. They recommend that there be advocates who work at every MSDPR office to guide individuals through the application process, and that MSDPR offices should always provide the opportunity to take appointments in-person to accommodate people’s learning and access needs. Accessing technology to make phone calls and navigate websites is not possible for many people who receive income assistance and who do not have the technology or literacy to use them.

Additionally, they recommend that for the duration of their lives, residential school survivors and survivors of the 60s Scoop should have a guaranteed income, separate from payments that survivors received for participating in class action lawsuits for their residential school experiences. Finally, the group mentioned that the living wage for employed people in BC is calculated for families with two incomes, so single adults would need even more money than the living wage of \$24 an hour in Vancouver. They also discussed the fact that rent costs can increase by up to 2% each year but that income assistance rates don't match that increase so they also recommend matching income support rates to the rate of inflation and annual rent increases.

Recommendation for Social Supports: Close the gap between the living and minimum wage

The group discussed their own personal experiences as people living in poverty where they end up relying on money lending institutions to fill in the gaps between their income and the cost of living. These companies deduct fees and interest, and the group added that that they also have to pay for transit to get to these places, so in the end they end up losing much more money by relying on these institutions to cash their cheques or borrow money. Additionally, since banks often won't cash cheques or accept transfers for people without ID, they are forced to rely on institutions like money lending institutions whose extremely high interest rates leave people with more debt than they started with. Finally, as mentioned above, another key social support for people living in poverty is providing them with the opportunity to obtain a post-secondary education for free or at a considerably subsidized cost.

Conclusion

Thank you very much for the opportunity to submit feedback and recommendations to the Ministry from communities directly impacted by poverty. We look forward to seeing the next steps of this strategy implemented in the province and to a more equitable and dignified place for us all to live.

Sincerely,

Pivot Legal Society

Nina Taghaddosi, RSW
Anti-Stigma Campaigner
nina@pivotlegal.org

POVERTY REDUCTION STRATEGY SUBMISSION
to the B.C. Ministry of Social Development and Poverty Reduction
April 30, 2023

Introduction

The Government of British Columbia has taken important steps to reduce poverty in the province, setting ambitious targets and instituting significant changes. Despite these changes, poverty rates in British Columbia remain among the highest in the country.¹ The renewal of B.C.'s Poverty Reduction Strategy is an opportunity to take additional actions needed to improve the financial security of British Columbians still living in poverty. In this submission, we strongly encourage the B.C. government to integrate proven financial empowerment approaches into its Poverty Reduction Strategy to boost the incomes of BC residents living in poverty and enable them to build the financial stability, security and resilience they need to move from poverty to prosperity.

What is financial empowerment?

Financial empowerment is an integrated set of interventions shown to measurably improve financial outcomes for people living in poverty.² These interventions include:

- Financial information, education, and coaching to build financial capability³
- Help to tax file and access benefit entitlements to increase incomes⁴
- Help accessing safe and affordable financial products and services to enhance financial inclusion⁵
- Connection to saving and asset building opportunities to build financial security⁶
- Consumer protection and education to reduce financial risk.⁷

Financial empowerment focuses on strengthening financial inclusion, knowledge, behaviours, and opportunities for people with low incomes. These are key determinants of economic security, but a critical gap in our current social support systems because many organizations serving people with low incomes lack the mandate, resources, and capacity to help the people they serve with their financial needs.

How financial empowerment helps to reduce poverty⁸

Financial empowerment solutions enable people with low incomes to build their financial inclusion, capability and stability and to measurably improve their financial outcomes, such as income, saving, and debt levels and credit scores. This, in turn, enhances their access to proven routes out of poverty – education and training, employment, entrepreneurship, and asset and home ownership.

Financial empowerment is not a substitute for other poverty reduction strategies. Instead, it is a critical, complementary, but often missing piece that can have a “supervitamin” effect,⁹ significantly boosting client outcomes when it is integrated into other programs, such as income assistance,¹⁰ employment and training programs,¹¹ housing and homelessness services,¹² settlement services,¹³ Indigenous services,¹⁴ and public health and health care.¹⁵

Large scale, independently evaluated pilots in Canada have shown that interventions such as tax filing assistance, benefit screening and assistance, and one-on-one financial problem solving and coaching address an unmet need among low-income people, measurably boost their incomes, reduce financial stress, and help clients to achieve target financial outcomes.¹⁶

Why financial empowerment is more critical than ever

Even before the COVID-19 pandemic, many British Columbians and Canadians more broadly were struggling financially. The COVID-19 pandemic and ensuing inflation and interest rate increases exacerbated this problem and made life increasingly unaffordable. Financial vulnerability has increased dramatically across all income levels, but particularly for low-income households. In 2022, 73 per cent of lower-income Canadians¹⁷ were *Extremely Vulnerable* or *Financially Vulnerable* compared to 65% in June 2021.¹⁸

Despite widespread financial vulnerability, Canadians with low incomes struggle to find the help they need to improve their financial health, including help to tax file, navigate benefits, and one-on-one help to deal with urgent financial issues and/or make a financial plan for their future. In 2022, “almost 800,000 of lower-income households experienced difficulties in accessing financial help programs or services.”¹⁹ This has been corroborated in more recent research undertaken with financial sector partners confirming that affordable, appropriate and trustworthy financial help services are often largely inaccessible for people with low incomes.²⁰

Many people with low incomes also do not tax file or have difficulty applying for benefits due to a variety of barriers, including insufficient access to clinics and services, the cost of commercial tax preparers and not knowing where to go for help.²¹ Approximately 13.5 per cent of British Columbians don’t file a tax return.²² This rate is likely higher among low-income BC residents, judging by the fact that over 20% of Canadians in the lowest income decile are non-filers.²³ Consequently, roughly one in five low-income BC residents is likely to be missing out on important income benefits and tax credits.

This does not have to be the case, however. In just four years (2017-21), through our Ontario government funded pilot program, **9** community Financial Empowerment Champion organizations in Ontario were able to help **87,397** Ontarians with low incomes to access **\$470 million** in additional income through tax filing and benefit assistance, in addition to:

- Providing one-on-one financial coaching or problem solving to **23,078** Ontarians
- Delivering financial education to **13,809** individuals

- Helping low-income families open RESPs for **1,521** children
- Training **3,670** community service providers to provide financial education, supports and/or referrals
- Mobilizing **2,484** tax clinic volunteers.

96% of surveyed Ontario service users told us they would recommend the services they accessed to others.²⁴ There is no reason that similar assistance and results could not be achieved in British Columbia.

BC financial empowerment leaders are eager to do more to reduce poverty

A number of Canada’s leading financial empowerment organizations are already resident in BC and eager to work with the BC government, and partners in all sectors, to put in place proven and innovative new financial help solutions to reduce poverty:

- **Family Services of Greater Vancouver** is one of Canada’s pioneering Financial Empowerment Champion organizations²⁵ and has been delivering a suite of financial help programs tailored for people with low incomes since 2016. This currently includes financial coaching and tax filing supports for people with low incomes across the Lower Mainland.
- **PLAN Institute** and **Disability Alliance BC** both support people with disabilities and their caregivers to navigate and access benefits, tax file, and plan for their financial futures and have been important leaders and partners in developing financial help tools for people with disabilities and their families, including: the [RDSP Calculator](#), the [Disability Benefits Compass](#), and the [Future Panning Tool](#).
- **Vancity** and **Coast Capital** are leaders in the credit union movement when it comes to reinvesting in the communities they serve and in improving the financial ecosystem. Both are important leaders, investors and partners in helping to develop and sustainably scale effective financial help programs and resources for people living in poverty.

With coordinated investment, collaboration and partnerships, these organizations could work with the BC government to significantly expand current service reach and impact.

Recommendations

1. Invest in community financial empowerment services delivered by community providers

Evidence shows that trained and resourced community organizations are often best placed to deliver affordable, appropriate and trustworthy financial help services for people with low incomes, helping to reduce and mitigate poverty and to build their financial stability and health.

Provincial investment to expand community-based financial empowerment services in B.C. would connect more residents with low incomes to income entitlements they are not yet accessing. Our pilots suggest that people who access help to tax file and access benefits see

their annual incomes grow by an average of \$3,699, with much larger increases for seniors, people with disabilities, and families with children under 18 years. Financial empowerment supports will also enable low-income BC residents to strengthen their broader financial well-being, which has been shown to positively impact other important outcomes with respect to employment, mental health, food security, and housing security.

BC already has organizations on the ground who are leaders and innovators in financial empowerment, with extensive expertise, established capacity and proven service models. We, therefore, encourage the government to work directly with existing leaders to identify ways to expand key financial help services to more B.C. communities. Should the BC government opt to prioritize particular target populations in its poverty reduction initiatives, financial empowerment services and outreach can be designed specifically for, and targeted to, these populations (e.g., Indigenous Peoples, people experiencing homelessness, newcomers, people with disabilities, etc.).

We further recommend that the government commit to a suitable 5-year funding investment. This will attract organizations that are interested in building long-term financial empowerment capacity, not just seeking short-term funding. (For reference, the Ontario government invested \$1.75 million annually for 4 years initially to achieve the pilot results outlined above. This included resources for direct service delivery and for Prosper Canada to administer the program and work with municipal social assistance providers to pilot integration of financial help into their services.)

This investment should include resources for monitoring and evaluation to track activities and outcomes and drive ongoing program improvements. Ideally, resources would also be provided for a community of practice to enable peer knowledge sharing, problem solving, and innovation among financial empowerment providers and to provide a mechanism to capture and share frontline insights with the government. Practitioners find this support invaluable and both the federal and Ontario governments have found the frontline feedback very helpful in helping them to detect and address emerging issues.

Prosper Canada would be pleased to lend its support to this effort, based on its experience administering competitive calls for proposals and administering 4-5 year financial empowerment pilots for the Ontario and federal governments.

2. Build proven financial help interventions into provincial services targeted to British Columbians with low incomes

Building financial empowerment supports into relevant public services (e.g. social assistance, employment, housing, shelter, and healthcare services) generates a “super vitamin” effect – boosting program outcomes by eliminating the financial stressors that otherwise impede client progress.²⁶ This is also a proven and cost-effective way to sustainably scale up financial help supports that reduce poverty, by building them into services with stable infrastructure, resources and large-scale reach into low-income populations.

We, therefore, encourage the BC government to identify one or more suitable provincial programs and to commit the necessary resources and policy/program changes to integrate financial help supports that best meet the needs of their service users and are likely to help boost target service outcomes. We also encourage the government to use human-centred service design methods to design, pilot and scale out the integrated supports, to ensure optimal outcomes for service users and providers. (See our case study [Designing impactful financial empowerment programs](#) for more information)

Investment in community-delivered financial help services and provincial service integration should be seen as complementary and mutually reinforcing initiatives. Service system integration can mean equipping provincial service providers to deliver some financial help interventions directly and/or to screen clients and refer them to other services more effectively delivered by community-based providers. A structured service design process will enable service systems to effectively identify which services they should be offering directly and which should be outsourced to community providers. This can only work though if there is parallel investment in community-based financial help services.

Conclusion

There are many other key policy changes and initiatives across ministries and departments that have not been highlighted in this submission that are necessary to reduce poverty for British Columbians and “lift people up, break the cycle of poverty and build a better B.C. for everyone.”²⁷ We are encouraged by priorities and actions of the B.C. government, including recent investments in childcare, housing and income assistance.

We encourage the government of B.C. to look to Prosper Canada as a collaborator and ally in leveraging the power of proven financial empowerment approaches to advance its poverty reduction goals and help more British Columbians to achieve financial wellbeing.

About Prosper Canada

Founded in 1986, Prosper Canada is a national charity dedicated to expanding economic opportunity for Canadians living in poverty through program and policy innovation.

As Canada’s leading national champion of financial empowerment, we work with government, business, research and community partners to develop and promote financial policies, programs, and resources that transform lives and foster the prosperity of all Canadians. We help service systems and organizations in all sectors to build proven financial empowerment approaches into their services in ways that are sustainable, help them achieve their goals, and tangibly increase the financial well-being of the people they serve.

Notes

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- Strategy #1: [Integrating Professional Financial Counseling](#)
- Strategy #2: [Professionalizing the Field of Financial Education and Counseling](#)
- Strategy #3: [Integrating Safe and Affordable Bank Accounts](#)
- Strategy #4: [Targeting Consumer Financial Protection Powers](#)
- Strategy #5: [Integrating Asset Building](#)

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The proprietary Index measures household financial resilience, defined as a household's ability to get through financial hardship, stressors and shocks as a result of unplanned life events, with measurement of financial resilience at the national, provincial segment and individual household levels every four months. The June 2022 Index is based on a robust sample size of 5061 adult Canadians and 1515 low-income Canadians from a representative sample of the population by household income, age, gender and province, with a MOE of 1.38%. Further information on the Index and Financial Resilience Institute's work is available at: <https://www.finresilienceinstitute.org/>

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RE: BC Poverty Reduction Input 2023

Please find below our organizations response to the BC Poverty Reduction Input opportunity.

1. What are the main factors contributing to poverty in your community today? What groups are most affected and why?

Income is always a factor in poverty but it is certainly not the only factor. Utilizing LIM or the MBM alone is not a sufficient tool to evaluate the true reality of poverty. It is not robust enough to paint a clear picture. Factors associated with poverty vary between communities, and a local approach is necessary as a supplement to province-wide policy considerations. When speaking with those living in poverty in our local community, it is clear that systemic issues still plague those most vulnerable. Locally, females dominate people struggling to thrive. This population includes mature/senior women who had relied on a spouse's income, which they can no longer count on due to separation, divorce or death; young females, working in a very gendered labour market who, on average, still make significantly less than men; or single parent households, 80% of which are led by females, trying to balance work and child rearing on limited income. While other groups are also impacted (newcomers to Canada, Indigenous communities and other equity seeking groups), in our local context, poverty is by far shouldered by women, many of whom are raising the next generation. It is clear from our community engagement work that the poverty cycle is incredibly hard to break. If we do not invest in lone parent households, the cycle will continue.

2. How have events since 2019 (e.g. COVID-19, inflation, climate change, etc.) impacted people in poverty in your community?

For people who are working but still gripped in the cycle of poverty, the recovery from COVID has hit significantly. Inflation and the threat of a recession continue to marginalize and push their spending power to negligible amounts. With the shortage of affordable childcare providers, many have to make the tough decision to stay home and accept social assistance as their main income support. They have no choice.

Our once affordable community has also been impacted by the housing shortage, which COVID has exacerbated. Many in our community are under threat of losing a place to live. Even if they have an affordable home, if they ever have to leave that property, they could not afford current market-based rent. This leaves many, predominately women with children, vulnerable to being unhoused and homeless. Spending 60-100% of income on housing is not thriving; it is hardly surviving.

3. The 2017/2018 engagement process showed us that we needed the following changes, which we have made:
 - Annual increases to the minimum wage
 - Increases to income assistance and disability assistance rates
 - Housing affordability measures
 - Eliminating interest on B.C. student loans
 - Removing Medical Services Plan premiums, among others
 - Which of these or other changes has had the biggest impact, and how?

The BC government has made some small gains at trying to reduce poverty, including the most recent budget announcement that will raise the BC family benefit by 10%, whilst recognizing that single parent families need even more support. The expansion of the healthy food program will also help to better support those most in need. Annual increases in minimum wages are also important yet they fall significantly short in addressing the wage gap between men and women. Minimum wage also does not address the gap between what is actually needed to live with dignity in our communities. The issue is not just about increasing wages; rather, revisiting tax structures and social assistance claw backs, and investing in low cost housing offer long term solutions to assist people in getting out of poverty and breaking the cycle.

4. What additional changes could the B.C. government make that would have the biggest impact in addressing poverty and why? What should we do first?

Invest in bringing back the village of supports, through social and community development through employing dedicated human resources that have government backing and longevity to tackle the issues. Financially support municipalities to hire and create a social community branch with government with dedicated staff that will provide long term positive poverty reduction impacts. We need to go beyond

temporary, one time and nominal band-aid solutions such as the BC Hydro credit, and look at how we can support families to build equity, increasing their spending capital and breaking that cycle of poverty.

One program mentioned from conversations with people living in poverty that they found may actually help their children break the cycle is the former B.C. HOME Partnership program. This allowed them to build some equity for the future. Without that program, they would never have been able to get out of the rental market and the constant insecurity that brings with it, which perpetuates the lack of resources within a family resulting in their children's inability to break free from poverty as they emerge into adulthood. As was noted in these conversations, "sustainable living is for the privileged."

5. How can we help people learn about and access the supports that are available for them?

Think outside the box for grant applications for non-profit organizations that provide community support services. Invest in funding mechanisms that encourage collaboration and collective impact work. Non-profits are all fighting over the same dollars with the unintended consequence being silo programs and services. This negatively impacts the people those programs and services are supposed to support. Encouraging collaboration and cooperation between agencies would provide greater success for individuals to learn and know about programs and supports. If you continue the highly competitive and erroneous funding stream to support social services that do the front line work, the system will not succeed.

People with lived experience of poverty have told us that they do not have the capacity or resources to fully appreciate and understand all that is offered. Online information can be overwhelming, and navigating online can be complex and frustrating. In-person community navigators, such as the community integration specialists, would be better at meeting people where they are at and providing individualized and specific information while also empowering people to learn how to navigate the system more easily on their own. Regionalization of this type of work, that is dynamic and ever changing, cannot efficiently be managed to support the needs of individuals in smaller or rural areas. The needs are different here.

6. What are your top 3 priorities for addressing poverty over the next five years? Over the longer-term?



Address the serious lack of affordable housing and ECEs. Revisit the BC home partnership program, build more public funded multi-unit family housing options, and support more market housing rental development projects. Continue to support the work of ECEs by ensuring they have access to a wage beyond the living wage, benefits and retirement options. Without ECEs, lone parent households and some dual parent families cannot maintain adequate employment.

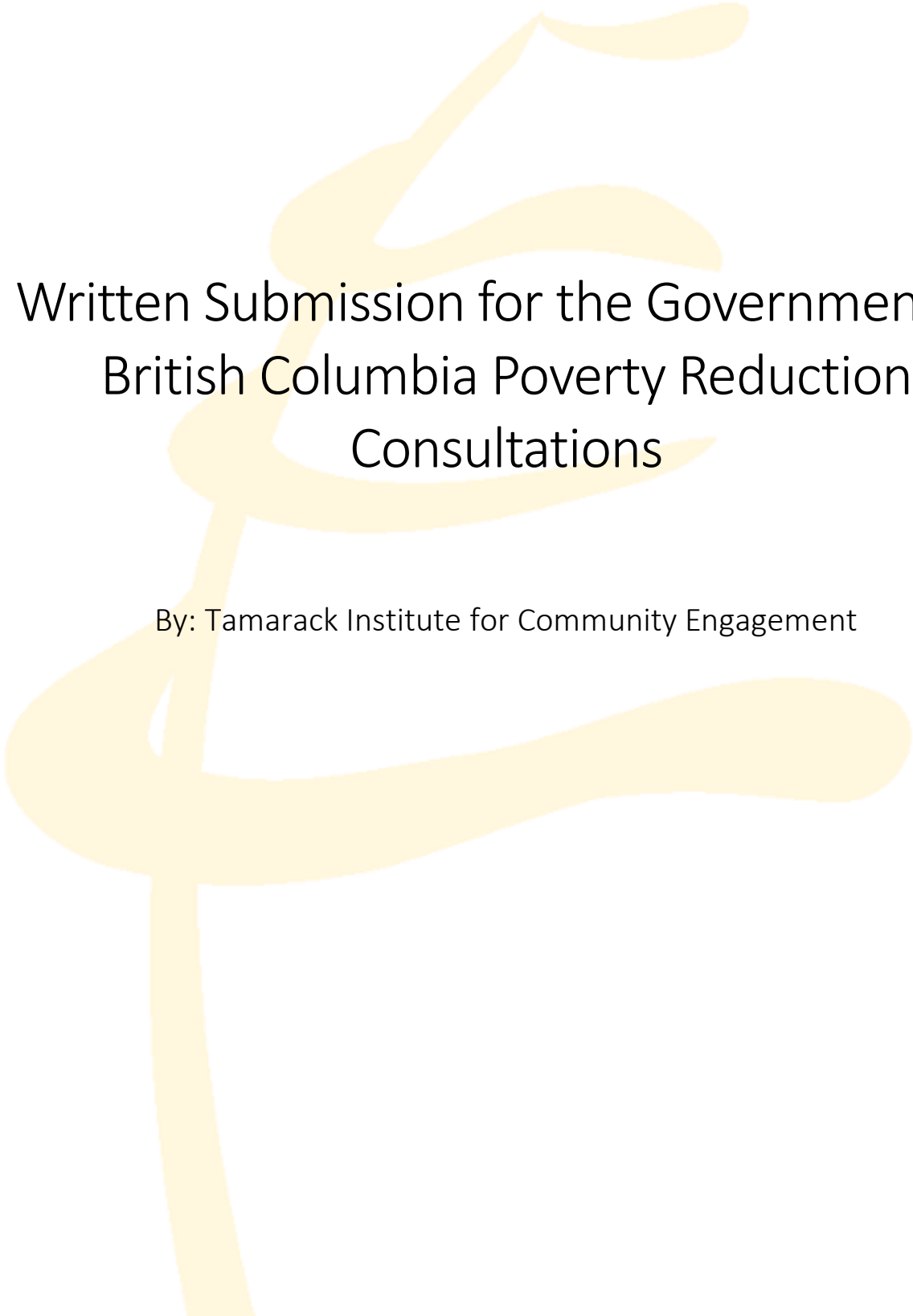
Seriously consider a basic income, but ensure equitable application, which would also require a look at the current tax structures. For example, a family making 80,000 a year, can and in many cases does, take home the same amount as a family making 140,000 a year, due to tax implications. This serves as a deterrent for making more money and/or getting better paying work that is more skilled. In other words, support a basic income but do not shoulder the burden on low/middle income families to support the structure.

Rebuild community, especially after COVID. Without the foundations to support families and the next generation, all other measures will crumble. Invest in social capital and community connections. Encourage and support municipalities to create social and community investment plans with dedicated human resources and adequate funding for long term social investment. This will support a long term approach to reducing poverty in BC.

Lastly, supporting funding structures that build on collaboration and are flexible to meet local needs will help break the cycle of poverty. With organizations, government and other community stakeholders working together to find solutions, offer supports, and ensure needs are met, each family, child and youth will be better positioned to succeed.

Respectfully,

Heather Glenn-Dergousoff
Project Specialist – Skills Centre
250-368-6360 EXT 235
Hgkenn-dergousoff@skillscentre.ca



Written Submission for the Government of
British Columbia Poverty Reduction
Consultations

By: Tamarack Institute for Community Engagement

List of Recommendations:

Recommendation 1: Continue to support local governments to advance their social role and promote place-based poverty reduction strategies and action.

Recommendation 2: Work with groups overrepresented in poverty to target initiatives for greater impact

Recommendation 3: Improve income supports and financial empowerment for those living in poverty

Recommendation 4: Address core affordability concerns including housing, public transit, and prescription medicines

Recommendation 5: Work towards long-term prevention of poverty through improved systems of care and early intervention

Tamarack Institute for Community Engagement

Tamarack Institute's deepest hope is to end poverty in Canada by engaging and respecting people, place, and planet. Over two decades, Tamarack has grown from a single learning network to four outcomes-focused networks and a learning center supporting collaboratives representing +400 Canadian municipalities, organizations, and communities. We support the on-the-ground experience of community leaders and collaboratives by creating tools and learning opportunities to grow capacities to achieve equitable community and population-level outcomes. In our work we are guided by the principles of community connections; that place matters; hope and optimism; equity and inclusions; courage and learning; and action and impact.

Supporting Communities to Take Action in British Columbia:

The Tamarack Institute and Communities Ending Poverty in BC is proud to work in partnership with the Government of British Columbia to contribute to poverty reduction throughout the province. Tamarack is working with more than 50 communities in British Columbia to advance their poverty reduction efforts. These efforts have highlighted important lessons about what is working to reduce poverty in the province.

- Community-level funding to support collaborative planning and action
- Multi-Ministerial approach
- Focus on meaningful engagement of people impacted by poverty
- A commitment to evaluation and renewal of the TogetherBC strategy

The following recommendations are meant to help strengthen this work by working with communities in partnership and based on the lessons emerging from place-based strategies in British Columbia.

Recommendation 1: Continue to support local governments to advance their social role, coordinate and promote place-based poverty reduction strategies and action.

As part of the TogetherBC strategy, the Government of British Columbia developed the Poverty Reduction Planning and Action Program in partnership with the Union of British Columbia Municipalities. This \$5 million dollar investment has been instrumental in advancing place-based strategies for poverty reduction.

Since 2021, the Tamarack Institute has worked with more than 50 communities across British Columbia at varying stages of poverty reduction activities. Many of these communities have seen greater connection to local governments ready to act and provide leadership toward poverty reduction due to this support.

One challenge that remains, once strategies have been developed, is long term support for backbone convenors to support communities to turn plans into action. We have heard from communities across British Columbia that they continue to struggle with sustainable capacity to coordinate and lead the work.

A review of 23 poverty reduction strategies (2021-2022, including both members and non-members of Tamarack's Communities Ending Poverty network), revealed that:

- Over 90% identified the need for improved and supported multi-sector collaboration, partnerships, relationships, and coordination at the community level in order to work better together to address the complexity of the issue, including capacity to plan and implement actions as well as work with higher levels of government.

We recommend:

- 1) Continuing to support the Poverty Reduction Planning and Action Program
- 2) Evolving the program to support municipalities and communities with sustainability funds for promising and impactful strategies

Recommendation 2: Work with groups overrepresented in poverty to target initiatives for greater impact

The recent report from First Call Child and Youth Advocacy Society, [2022 BC Child Poverty Report Card](#), highlights that racialized population continue to be more likely to be impacted by child poverty. This disparity is most obvious for on-reserve child poverty data. In 2020, the on-reserve child poverty rate was more than twice as high the overall child poverty rate in British Columbia. It is clear that targeted interventions are needed address this reality. As well, poverty is feminized, with women over-represented in intersectional analysis.

Local poverty reduction strategies indicated a high need to: address lack of awareness, stigma, discrimination, and racism; decrease barriers to services and improve system navigation supports; support trauma-informed practices, including training and cultural safety practices; embed decolonization and reconciliation into the work, and implement policies to improve inclusion and promote a sense of belonging. Equity, justice, human rights and diversity were identified as

cornerstones of a healthy community. Since many strategies were developed during the COVID-19 pandemic, unequal impacts were noted with isolated persons who had fewer resources being more impacted and less able to access services and supports to help meet their needs.

Tamarack agrees with the recommendations put forward in the 2022 BC Child Poverty Report Card. We recommend:

- 1) Collaborating with First Nations, Métis and Inuit governments and Indigenous organizations to address the factors leading to child and family poverty in order to prevent, reduce and eradicate child and family poverty in Indigenous communities.
- 2) Support the development of attainable, suitable housing solutions for new immigrant populations.

Recommendation 3: Improve income supports and financial empowerment for those living in poverty

Governments must act to ensure that families impacted by poverty have sufficient income levels to succeed while taking steps to ensure they have appropriate financial tools to succeed.

In Canada, temporary COVID-19 measures postponed the impacts of the affordability crisis and helped many families facing deep poverty. However, as these measures come to a close, many families are seeing their incomes decline at the same time as costs continue to rise. This requires urgent and coordinated efforts across all levels of government working with key sector partners.

All poverty reduction strategies emphasized the gap between income and the cost of living, including those on a fixed income, low wages combined with insufficient hours or precarious work, a low minimum wage (despite recent increases), and current rates of income and disability assistance. The [BC Basic Income Panel](#) made numerous important recommendations for income reforms to improve supports and encourage financial empowerment. In addition to the recommendations below, many communities emphasized opportunity to improve access to training and education leading to meaningful, higher wage employment.

In alignment with the 2022 BC Child Poverty Report Card, we recommend:

- 1) Index the BC family benefit to inflation
- 2) Establish a fair wages commission and ensure all workers are protected by the hourly minimum wage
- 3) Raise income and disability assistance rates to bring total welfare incomes up to the CFLIM after-tax poverty thresholds and index them to inflation.

Recommendation 4: Address core affordability concerns including housing, public transit, and childcare

In poverty reduction efforts, we know that there are some game changer actions that have impacts on poverty beyond what we initially consider. Many of these game changers can be further improved by working with communities to take advantage of local assets. Three game changers that could be advanced with communities, while also addressing issues of affordability impacting all British Columbians are housing, public transit, and child care.

As the February 2023 [Policy Note from the Canadian Centre for Policy Alternatives](#) notes, major investments are needed in non-market housing to reach BC's housing targets. This work would also require a multi-government approach and could support job security and stability if done correctly.

In addition to housing, public transit is an important game changer that allows individuals living in poverty to access services, seek employment, and engage with community.

All strategies reviewed indicated these top priorities:

- High need to address housing – including access to affordable housing (including addressing market and nonmarket measures) as well as addressing homelessness and improving shelter options.
- Access to public transportation – including implementing or improving transit options within community, decreasing barriers to access through decreasing fees and improving local routes, as well as implementing critical inter-city transportation solutions. The loss of Greyhound is being felt keenly by rural and remote communities throughout BC.
- Access to licensed child care – including increasing the number of early childhood educators and child care spaces, and emphasizing the link to quality early childhood development, access to employment, and community economic development.

We recommend:

- 1) Working with communities and non-profit partners to increase the supply of non-market housing
- 2) Work with municipalities to implement viable transit options and support reduced-fee transit access for low-income households
- 3) Continue 2023 childcare investments and work with communities to help families access high quality programs that match their needs.

Recommendation 5: Work towards long-term prevention of poverty through improved systems of care and early intervention

There are many indications that systemic improvement in the prevention, early intervention, and treatment of mental illness is needed. Chronic homelessness and the opioid crisis are costly examples and symptoms of a much deeper issue and indicators that the current 'system of care' is failing our most vulnerable citizens. All strategies reviewed indicated an urgent need to decrease stigma and other barriers, improve access to resources and culturally safe practices, and improve access to health care and qualified, regulated, affordable mental health services. There is opportunity to implement best practices in community 'hubs' that provide wrap-around multi-faceted supports – from supported housing to health care a 'one-stop shop' for wholistic, person-centred approach that has proven to be effective.

We recommend:

- 1) Regulate and improve universal access to licensed mental health practitioners
- 2) Support community social worker positions in medical clinics and hospital emergency facilities
- 3) Support the development of community health hubs that provide barriers-free access to supported services

www.tapsbc.ca
tel: 250.361.3521
fax: 250.361.3541



828 View Street,
Victoria B.C.
Canada, V8W 1K2

April 28, 2023

ATTN: Ministry of Social Development and Poverty Reduction
PO BOX 9929 STN PROV GOVT
Victoria, BC V8W 9R2
Via Email: BCPovertyReduction@gov.bc.ca

VIA EMAIL

RE: Updating *Together BC*, the British Columbia Poverty Reduction Strategy

Please accept the following as our submission for your consideration in updating the BC Poverty Reduction Strategy.

Together Against Poverty Society (TAPS) provides free, face-to-face legal advocacy services for people on low income, in the areas of income and disability assistance benefits, help applying for persons with disabilities designation, residential tenancy dispute resolutions, and a year-round income tax program. TAPS operates in Greater Victoria, on the traditional, ancestral, and unceded territory of the ɫəkwəŋən People, known today as the Songhees and Esquimalt Nations; we also provide legal advocacy services throughout the traditional and ancestral territories of the WSÁNEĆ People. Over the last year, TAPS has expanded service to the city of Nanaimo, providing income and disability assistance legal advocacy services in the traditional, ancestral, and unceded territories of the Snuneymuxw, Snaw'naw'as, and Stzuminus Peoples.

In the last five years since the creation of B.C.'s first Poverty Reduction Strategy, we have experienced and witnessed profound changes in our province, not limited to the death of thousands of people to a toxic drug supply, a severe shortage of affordable housing, lack of legal protection for renters and vacancy control, rising costs of basic necessities, direct and lingering impacts from the COVID-19 pandemic, a critical shortage of doctors and primary-care physicians, increased closure of walk-in clinics, and over-run hospital emergency wards. While providing legal advocacy services and assisting people to navigate government benefits and processes, TAPS staff witness the intersections of poverty, housing unaffordability, and an overburdened health-care system as the daily realities of the people we help. We urge you to consider the following during your review of *TogetherBC*.

The BC Poverty Reduction Coalition, of which TAPS is a member, has produced a thorough submission, highlighting several critical themes and issues. TAPS fully supports and endorses this submission and intends for this letter to supplement the work done by the BCPRC to date. While this submission does not focus on benefit rates, none of the following recommendations can be separated from the reality that Ministry benefit rates simply do not cover the costs of basic needs, resulting in those relying on social assistance falling deeper and deeper into poverty. We continue to call on government to take direct action with substantial and meaningful increases to Ministry benefit rates, that accurately reflect the costs of housing and basic needs in 2023.

PWD Application changes:

Issue: Excessive length of application a barrier to individuals living with disabilities, and adds burden to an overwhelmed medical system:

At a staggering 24 pages, the PWD application is a frustrating and daunting process for individuals with disabilities to navigate. At TAPS, we spend countless hours assisting clients to navigate the PWD application process. We often see clients who, despite meeting the legislated criteria, decide not to follow through with their application due to the overwhelming presentation of the application itself. Even with the support of an advocate, some of our clients, take years to successfully complete the process due to the various poverty and disability related barriers they face. It is common for clients to stop and then restart the process several times before they are in a position to manage the entire application. These people live without the financial and medical support they are entitled to due in part to the overwhelming length of the current PWD application.

It is widely known that approximately 1 in 5 British Columbians do not have access to a family doctor. This is a massive barrier to completing the PWD application as it requires the applicant to find finding a primary care professional to complete a long and complicated application, within a medical system that is already overburdened. This is often a huge barrier to accessing PWD designation and supports. Many clients report that their doctors are simply too

overworked to take the time needed to thoroughly complete such a lengthy and exhaustive application. Many more report that they simply do not have a primary care provider to ask. While some successfully find a willing doctor at a walk-in clinic, many others report not having had the opportunity to form a relationship with a specific doctor, which often leaves doctors feeling uncomfortable completing such an in-depth assessment.

In the midst of an unprecedented health care crisis in B.C., it is the responsibility of the administering body to ensure that the paperwork required of health professionals is as succinct and purposeful as possible. While recognizing that evidence of very specific legislative criteria must be met through this application, we believe there are ways these criteria can be demonstrated without requiring such a long and repetitive application form. **We recommend that the Ministry take immediate and significant steps to reduce the length of the PWD application form to increase accessibility and decrease burden on the health care system.**

Issue: Ineffective language impeding professional's ability to report on legislated criteria:

A barrier to gathering accurate information from medical and prescribed professionals is that the language used in the application is inconsistent with the language and criteria set out in legislation. For example, in Section 3, prescribed professionals are asked to indicate whether an applicant's ability to communicate is "good", "satisfactory", "poor", or "unable". We submit that this language does not clearly outline whether the applicant's ability to communicate is restricted or their level of restriction. As these terms are not defined, prescribed professionals are left to subjectively decide what is being asked: Are they being asked to report on their opinion of an applicant's overall ability or their ability at the time of the application being filled? Instead, we would like to see language which would more accurately allow professionals to demonstrate legislative criteria. **We recommend that the Ministry amend the language used in the PWD application questions to align with the legislative criteria they are meant to report on.**

Consistency with the Family Law Act and marriage-like relationships

Issue: Forced financial dependency and loss of access to assistance benefits

TAPS applauds the changes made to the Employment and Assistance and Employment and Assistance for Persons with Disabilities Regulations in early 2020 – lengthening the time two persons can co-habitat before they may be in a marriage-like relationship from 3 months to 12 months. However, the Regulations are still not on-par with the *Family Law Act*, which sets the length of cohabitation at a continuous period of at least 2 years. We increasingly hear from people who are forced choose between maintaining their own financial independence and benefits, or losing the emotional, social, and familial support of a long-term relationship. This outdated concept of "spouse in the house" that has long-been built into social assistance legislation across jurisdictions, and for successive generations unfairly penalized female-headed households, forcing them to add a male person or co-parent who earns their own money to their Ministry file. This often places the recipient into a position of financial reliance and dependency on their male partner. After any applicable earnings exemptions have been utilized, the recipient is further penalized for having a partner earning an income, often triggering an abrupt cut-off of their income or disability benefits. This leaves the recipient without their own source of regular income and creates deeper economic and financial dependency on the other person. With both the scarcity of affordable housing and rising costs of necessities, having to financially depend on another person with whom you have lived with for 12 months, with no separate income source, places Ministry clients at increased risk of unsafe, sub-standard, and abusive living arrangements. If it is not possible to eliminate the inclusion of a marriage-like relationship as a form of spousal dependency and how it is used to determine a family unit's eligibility for Ministry assistance, **we recommend that the EAW and EAPWD Regulations align with the Family Law Act, for the purposes of determining if two persons are in a marriage-like relationship, and increase the length of continuous cohabitation from 12 months to at least 2 years.**

Expanding income treatment to Employment Insurance benefits similar to WCB Temporary Wage Loss Replacement Payments

Issue: Greater equity on how wage-replacement benefits are treated and exempted for Ministry clients

During the COVID-19 pandemic the federal government recognized just how difficult it is for an individual to afford all their basic needs on less than \$2000 per month (the maximum amounts of the promptly enacted *Canada Emergency Response Benefit* (CERB), *Canada Recovery Benefit* (CRB), and extended EI benefit claims during the initial year and-a-half of the pandemic). While the Ministry's temporary CERB/CRB/EI exemptions for persons with PWD designation or in-receipt of Income Assistance were welcomed during the tenure of the federal emergency income

support benefits, those exemptions were terminated in the Fall of 2021. This put many Ministry clients who had relied on those additional funds to supplement their Income or Disability assistance in precarious and unsustainable situations at a time when grocery, gas, and average rent costs continued to soar. When a person in-receipt of Ministry assistance starts to receive any Employment Insurance benefit, that money is deducted dollar-for-dollar from their monthly benefit. This is true even for persons with PWD designation who were able to apply their employment earnings to their Annual Earnings Exemption (AEE) up until they stopped working and started collecting EI benefits.

However, another similar type of temporary worker’s benefit is treated drastically different by the Ministry: one type of recurring WCB benefit is eligible to be applied against a PWD recipient’s AEE - WCB Temporary Wage Loss Replacement Payments. Much like EI benefits, WCB Temporary Wage Loss Replacement Payments are time-limited, often with a pre-determined end-date, and meant to supplement a worker’s loss of earnings, commonly related to a work-place injury, disability, or temporary medical condition. **We recommend that the Ministry expand its income treatment of Regular and Medical Employment Insurance benefits to be on-par with WBC Temporary Wage Loss Replacement Payments and allow PWD recipients to apply EI benefits to their Annual Earnings Exemption.**

Prioritize mental health coverage:

Issue: Ministry clients are not provided any extended coverage for mental health:

The Ministry does recognize that an applicant with a severe mental impairment, which can include a mental disorder, can be found eligible for PWD designation, provided that they meet the other eligibility criteria. However, there are no mental health supports available once a person is approved for PWD. In doing so, the Ministry effectively recognizes the impacts of mental health challenges while simultaneously disregarding them. All of the medical supports provided to some Ministry clients through Schedule C are related to a person’s physical functioning; there is nothing available to support a person’s mental health. At TAPS, we see a large number of clients applying for PWD on the grounds of a mental impairment. Some of those who get through the application process are successful in gaining PWD designation only to find no coverage for counselling, or treatments such as cognitive behavioral therapies. The limited mental health services available to individuals without private insurance often have staggering wait times and a limited number of sessions available. This is completely inadequate in meeting the needs of clients. **We recommend the Ministry take immediate action to include mental health coverage for all clients, with a focus on both emergent and ongoing supports.**

Increased dental coverage:

Issue: Insufficient dental coverage for Ministry clients:

The British Columbia Dental Association (BCDA) provides an annual suggested fee guide for dentists in BC. While dentists are not obligated to follow the fees outlined in the fee guide, it provides a benchmark for service providers to use when determining their pricing. Each year, the fees in the fee guide increase. Green Shield Canada reports a 5.99% increase in fees between the 2022 and 2023 fee guide and an increase of 7.35% from 2021 to 2022. In comparing the current Ministry’s Schedule of Fee Allowances with the 2023 BCDA Fee Guide, it is clear how inaccessible and costly even a very standard dental checkup and hygiene appointment would be for an individual trying to live on disability assistance. For example, for an adult on PWD with an uncomplicated oral health history who sees their dentist regularly, one could reasonably expect the following:

Description	Code	BCDA 2023 Fee Guide	Ministry Fee Allowance	Difference
Recall examination	oral01202	\$38.50	\$17.40	-\$21.10
Polishing	11101	\$44.60	\$24.03	-\$20.57
Scaling, 2 units	11112	\$107.60	\$44.34	-\$63.26
Fluoride treatment (varnish)	12113	\$22.40	None.	-\$22.40
Bitewing radiograph (2 films)	202142	\$29.30	\$13.59	-\$15.71
Total		\$242.40	\$99.36	-\$143.04

A client on basic Income Assistance would have no coverage for these very basic services. The Ministry website says that people who are unable to pay for dental care “may have to delay some services until the next year or until they or their family members are able to pay for the services themselves”. This message indicates teeth are a privilege which vulnerable community members are not entitled to. We implore the provincial government to take immediate action to better the oral, and therefore overall, health of British Columbians living in poverty. **We recommend that the Ministry immediately synchronize their Schedule of Fee Allowances to align with BC Dental Association Fee Guide, as well as expand and extend Schedule C coverage to all Ministry clients, including those receiving Income Assistance.**

Expanding eligibility for Medical Services Only

Issue: Lack of critical medical coverage for seniors who relied on federal disability benefits prior to 65

Medical Services Only (MSO) is a classification of Ministry recipients, most commonly those who either received Persons with Persistent Multiple Barriers benefits or PWD benefits, and who have stopped receiving their monthly benefit because they are no longer financially eligible. We most often see this process occur when a Ministry recipient has exhausted any applicable earnings exemption and continues to receive other forms of income, cutting them off from their monthly Ministry assistance. More commonly, this transition to MSO occurs frequently when a person turns 65 and begins to receive federal income support, like any Canada Pension Plan benefits, Old Age Security pension and the Guaranteed Income Supplement. While MSO does not include access to several diet, natal, and nutritional supplements, it does allow a person to continue receiving several other Schedule C health services, including optical and dental supplements, extended medical therapies, medical supplies and equipment, devices and aids, low-cost prescriptions, medical transportation, no-deductible PharmaCare and MSP coverage, tube-feeding supplements, and the alternative hearing assistance supplement. MSO is only available if you have demonstrated initial financial eligibility and qualified to receive PPMB or PWD, or received one of those benefits and live in a special care facility: a person cannot apply for *just* MSO status if their current income makes them ineligible to actually receive either of the two qualifying benefits. The ability to transition off income benefits from the province, while maintaining the bulk of medical coverage of extended medical benefits is essential for so many as they age, often with complex disabilities and medical conditions.

While those receiving CPP-D benefits can apply for PWD designation through a process known as Prescribed Class, and receive a small top-up in monthly income and access to PWD Extended Medical coverage – this is only possible if they meet the PWD income limit for their family size, and if their current monthly income is *under* what they would receive on PWD benefits. For a single person, the current maximum monthly PWD rate is \$1358.50; if a disabled person under 65 received \$1360 a month in CPP-D as their sole income source, they would automatically be ineligible for PWD designation, and lose any chance to access Extended Medical coverage. Over decades, hundreds and thousands of disabled persons who relied solely on CPP-D benefits, and then aged into receiving federal seniors benefits like OAS, GIS, and CPP at 65 were barred from accessing Extended Medical coverage through the Ministry. **We therefore recommend that persons receiving CPP-D benefits, who aren’t eligible for PWD designation through Prescribed Class due to their higher monthly income, still be eligible for MSO coverage.** In this case they would not receive any additional income support from the Ministry, but would be able to access specific health coverage to help offset the often-higher medical costs that persons with disabilities contend with.

Precarious Housing

Issue: Evictions for landlord’s use of property in an increasingly unaffordable rental housing market

At TAPS, we have seen a significant increase in the number of eviction notices for landlord’s use of property, especially in older low-rise apartment buildings where many Ministry clients live. We believe landlords are turning to this type of eviction in response to new rules regarding four-month notices to end tenancy. Instead of renovations, landlords are now claiming landlord use of property when they wish to turn over a suite so that the unit may be rented at an increased rate. While there is a legitimate use of this provision in providing for a landlord from genuinely taking over a rental unit so that they or a close family member may reside in it, it is clear this provision is being abused like the 4-month notices for renovations was previously. We have increasingly seen landlords try to get around this provision by expanding what it means to occupy a suite. The burden of proof for this type of eviction notice is low, and the penalty provision for bad faith evictions has not been great enough to create a financial disincentive.

Ministry clients who are longstanding tenants are disproportionately being targeted with these types of eviction because their rent is low due to in-tenancy rent control. This places them in particularly precarious situations since they cannot afford to pay current market rent on assistance alone in the event they are forced to vacate. We would like to see the Residential Tenancy Branch make eviction for landlord's use of property only possible by an application to the branch like they did with renovations to help slow the staggering rate of evictions in BC. However, this does not address the root issue, which is that landlords in BC currently have significant financial incentive to evict tenants. Implementing a form of rent control which limits the amount a landlord can increase the cost of rent after a unit becomes vacant – also known as vacancy control – would remove this incentive. **We recommend that the Poverty Reduction Strategy take immediate steps to implement vacancy control to prevent Ministry clients from being targeted for eviction, to increase housing stability for tenants, and to help preserve affordable housing stock across the province.**

Conclusion

We at TAPS support the continued efforts of the Poverty Reduction Strategy to provide a pathway out of poverty for so many British Columbians. In working with our clients to help them along this pathway, we witness firsthand the practical setbacks and barriers that many face. These submissions are intended to highlight some of those barriers, and to suggest ways such obstacles may be removed towards the goal of reducing poverty in our province. Thank you for your time and consideration in reviewing these submissions. You are welcome to contact us with any further questions or inquiries regarding our position.

Sincerely,



Caitlin Wright
Legal Advocate

Together Against Poverty Society

E: cwright@tapsbc.ca

P: (250) 900-4544



Gillian Gaffney
Legal Advocate

Together Against Poverty Society

E: gillian@tapsbc.ca

P: (250) 900-4522

May 5, 2023

Attention: Whitney Borowko, Executive Director, Strategic Policy Initiatives Branch

Re: Together BC 2024 Update

TogetherBC, British Columbia's first Poverty Reduction Strategy set a path to reduce overall poverty by 25 per cent and child poverty by 50 per cent by 2024. Over the last several years, the Province has invested in, and championed many different initiatives in support of these goals. The Strategy has captured significant momentum in incremental changes to support poverty reduction across the province, including adjustments to income and rental supports, support for families with the cost of childcare, work related to complex care and affordable housing, and initiatives to encourage local government led action on poverty reduction, to name just a few. Indeed, we are encouraged about the recent changes to the systems of social supports throughout the province and hopeful about what we might achieve in the future.

Urban Matters CCC is a social enterprise that aims to address complex social challenges in community. We support local governments and community collaborations with systems change work and reinvest a majority of our profits back into community innovation. Our vision is to co-create inclusive communities where everyone has the opportunity to thrive. Our objectives align well with the TogetherBC Poverty Reduction Strategy, and we hope to work together with the Province to achieve our collective goals. There is much we could focus on as it relates to Poverty – our work touches the diverse and interrelated systems of housing and homelessness, mental health and substance use, supported employment, inclusion and community health. As we know, these systems create an often-complex fabric for individuals with lived and living experience of poverty to navigate. Our focus for this submission is less on the nuts and bolt of these systems, and more about supporting the application of an overarching social innovation lens to the next stage of the TogetherBC work, one that we hope will advance the province's goals to measurably reduce overall and child poverty.

As a result, we have organized our submission as follows:

- A framework for introducing social innovation to the TogetherBC strategy and subsequent implementation;
- Supporting local government implementation of poverty reduction;
- Exploring social finance mechanisms to accelerate poverty reduction.

Framework for Introducing Social Innovation to TogetherBC

Social innovation is a movement and collection of practices that offers considerable promise for the public sector, as has been recognized by SDPR in years past. A feature of social innovation is that it combines multiple disciplines, types of actors and sectors, and describes a process from initial prompt through to scale and systemic change. For the public sector, there are three key features of social innovation:¹

¹ https://www.undp.org/sites/g/files/zskgke326/files/publications/GCPSE%20Social%20Innovation_Brief.pdf

- ⇒ Experimental approach - Experimentation entails an evidence-based approach, acknowledgement of the limits of current knowledge, multiple small bets about what might work, and acceptance that some attempts will fail but provide learning that builds towards future success.
- ⇒ Distributed systems - Innovation and initiative are dispersed to the periphery and connected by networks. Public managers must support and partner with social innovators: people who initiate and lead social innovation initiatives, and who can be found anywhere within the system, but tend to be semi-outsiders and boundary spanners.
- ⇒ User Participation - Social innovations are developed 'with' and 'by' users and not delivered 'to' and 'for' them. Co-design and co-production are common elements, and initiatives build community capacity in addition to delivery direct project impacts.

As the TogetherBC Strategy has been implemented through a variety of channels, some have embraced and highlighted the promise of social innovation. Many different types of change agents exist that include governments, foundations, the non-profit sector, and to some extent, the private sector. However, siloed efforts have created a patchwork of approaches that result in situational complexity (see Figure 1).

In recent years, public service innovation methodologies including systemic design, strategic foresight, behavioral insights, human centered design, etc. have been increasingly adopted and used within a public sector context to assist public sector professionals/leadership unlock new public value. When done well, these approaches can reveal valuable insights and unlock new potential in addressing redundancies and gaps in the systems at play, and to support innovation and transformation.

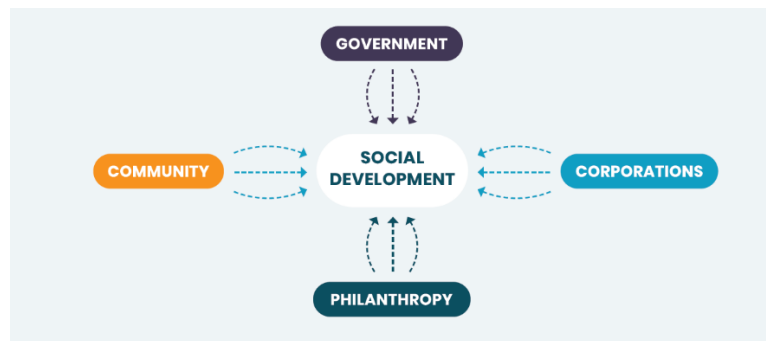
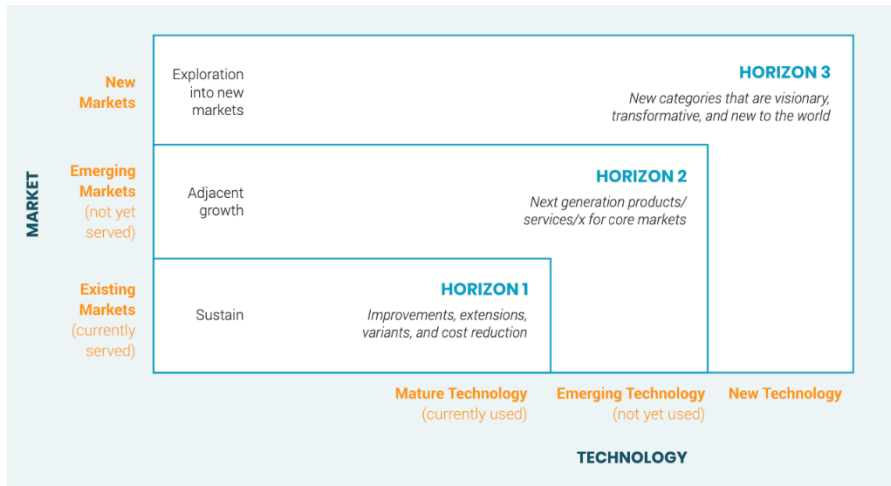


Figure 1: Social Development Funding and Implementation Map

Our team at Urban Matters is curious if there is an opportunity to consider complimenting the already commendable work occurring related to poverty reduction landscape through the development and application of a tailored innovation framework that is steadfast in its pursuit of transformational change in this space. One way to consider the activity of the Together BC strategy might be through the 3 Horizons Model, one we use within our team to support our community innovation endeavours (see Figure 2). Although traditionally conceived to support innovation within a for profit business context, we wonder if there is opportunity to consider program and policy actions within TogetherBC with a similar lens. The 3 horizons as follows:



- Horizon 1 ideas provide continuous innovation to a company's (or in this case a government's) existing business model and core capabilities in the short-term.
- Horizon 2 ideas extend a company's (or governments) existing business model and core capabilities to new customers, markets, or targets. We think about

Horizon 2 as offering significant opportunity for thinking about new types of partnerships, delivery mechanisms, different paradigms for service delivery and more.

- Horizon 3 is the creation of new capabilities and new business to take advantage of or respond to disruptive opportunities or to counter disruption.

An opportunity to activate and implement this type of approach as you update the TogetherBC strategy is to map the existing activities within TogetherBC according to the 3 Horizons, and facilitate an integrated team within SDPR and other Ministries to where the new directions fit on the innovation model. This type of exercise offers an opportunity to consider and understand they types of activities that exist for the government to pursue, and may unlock additional insights about the system, preferred approaches and opportunities.

To be clear, this is just one simple option we see, with significant opportunity to design an innovation methodology that makes sense given context of this problem space. We would be happy to discuss this idea further, and if desired, support you and your team in the implementation of this type of process.

Supporting Local Government Implementation of Poverty Reduction

One initiative stemming from TogetherBC has been the Poverty Reduction Planning and Action Grants. These grants have been administered by UBCM through 4 proposal intakes from 2020 to 2023. Little has been done to assess the progress local and regional. Little has been done to assess the progress local and regional governments have made to advance poverty reduction with these grant opportunities. There is value in synthesizing local data, developing a series of impact metrics, highlighting common themes, and, highlighting bright spots in local/regional leadership to date.

While undoubtedly valuable and positive work has occurred by local governments and their partners to advance poverty reduction, we know from our work that there remains an implementation gap related to capacity, funding, and willingness to advance bold ideas. What is the implementation gap, and what are the conditions at play that are allowing some organizations to succeed while others do not? We propose work needs to happen to identify the positive deviants in the local poverty reduction system and identify the successful behaviour and strategies in place to promote their adoption.

Furthermore, there is a need for customizable resources for local and regional governments to help activate action in certain areas of poverty reduction that have been identified by multiple jurisdictions, such as neighbourhood hubs for community connection to the services sector, embedding regular engagement with people with lived and living experience, or running local anti-stigma campaigns. Local governments would benefit from the development of toolkits, resources, and organizational

development opportunities to provide local capacity lift and simplify implementation. At the same time, we anticipate there is a need to consider culture and behaviours that might support or detract from action on poverty reduction, and therefore suggest there may be a need to consider organizational coaching, governance, and leadership opportunities to create the conditions for local poverty reduction actions to move forward. These behaviour based interventions include the ability of an organization to think and act differently in response to social complexity, the courage to be experimental, and the confidence to challenge organizational and societal norms.

Taken together, we anticipate work might include the following components:

1. Work closely with UBCM and local governments to assess the impacts of the Poverty Reduction Planning and Action Grants administered from 2020 to 2023. We anticipate the work will include various engagement through surveys, in-depth interviews, and desktop research, as well as the identification of impact metrics, outcomes, and gaps. The result will be a comprehensive summary of poverty reduction strategies at the local level, and their associated outcomes in community.
2. Establish a collaborative learning community for local and regional governments and their partners who were recipients of the Poverty Reduction Planning and Action Grants. Through facilitated dialogue, resources, and learning, support sustained poverty reduction efforts beyond the life of the grant, and to support the uptake of ‘positive deviant behaviours’ that will support sustained action on poverty reduction at the local level.
3. Using the impact metrics and other qualitative assessments completed in Step 1, unpack the ‘implementation gap’ to identify why some local and regional governments are succeeding in poverty reduction actions, while others are stalled. As a part of the work, we will identify ‘bright spot’ initiatives completed, or in progress by local/regional governments and their partners. The intent will be to target local initiatives that are demonstrating positive outcomes, are catalysts for additional action, and which have broad scalability and replicability.
4. Develop toolkits, organizational resources, sample deliverables and establish collaborative learning communities to support repeated delivery of these ‘bright spot’ poverty reduction initiatives in local contexts throughout the province. It is anticipated the work will closely involve the local government organizations that were involved in delivering the initial action and their partners. It will be important to engage other local governments to understand the types of resources that would be useful to accelerate the implementation of each idea.
5. Host learning events with Ministry of Social Development and Poverty Reduction staff, as well as staff from other Ministries to provide feedback loops, increase knowledge exchange, and inform policy (re)design as needed. These learning events will also increase the capacity of local/regional governments to build effective and collaborative working relationships with Provincial authorities.

The above work would support the Ministry of Social Development and Poverty Reduction to update its TogetherBC strategy with practical, evidence-based understanding of the progress made at the local level. The work would also support an understanding of opportunity areas for future resource and funding focus. By developing toolkits, learning opportunities, and collaborative pathways for implementation of poverty reduction ideas at the local level, the Province can accelerate and build on its momentum for poverty reduction led by local and regional governments, and help to delineate further supports provided at the local level during the implementation phase of the TogetherBC 2024 strategy.

Exploring Social Finance Mechanisms to Accelerate Poverty Reduction

At Urban Matters CCC, we believe in the catalytic potential social finance to help address some of the most complex and wicked challenges of our time. As an organization we are undertaking learning and capacity building to understand the potential of different financial tools to support innovation, and perhaps inspire a different set of actors becoming involved in solutions to poverty and other social challenges. Although we are at an early stage of learning how we might use social finance to catalyse greater impact in our CCC contributions (sharing of our profit), several external initiatives are taking shape. We share with the invitation of your involvement to learn more as the process unfolds. There are significant opportunities for government entities to contribute to these types of processes, and potential to consider social finance as an implementation opportunity to support some of the goals within the TogetherBC 2024 Strategy. Blended capital approaches where government capital is the ‘first in’ helps to de-risk and accelerate the mobilization of additional private capital. These types of approaches are certainly interesting to us as we explore ways to introduce additional financial capital and alternative actors into this ecosystem.

Two initiatives are emerging, and we are actively working to connect across the systems to learn and shape these ideas:

- ⇒ ***Mobilizing Capital to Support the Downtown Eastside*** – We are pleased to see the attention and focus the Province is giving to the Downtown Eastside, and have reviewed the Plan to support a renewed focus on the challenges experienced by that neighbourhood. We note that to a large extent, the Plan focuses on actions of the Province and social serving sector in the neighbourhood. Considering this focus, we wonder: *how might social finance offer a platform to mobilize private capital in service of supporting the Downtown Eastside neighbourhood and its residents?* Several other place-based models offer us inspiration and insight, including the Boston Impact Initiative. We hope to convene a group of actors that would begin to explore this question, including the Vancity Community Foundation, Vancity Credit Union, EMBERS Eastside Works, Potluck Café, the Community Impact Real Estate Society and more.
- ⇒ ***Mothers with Lived and Living Experience Fund*** – The goal of this fund is to mobilize financial capital to support healing journeys towards belonging for mothers with lived and living experience of homelessness and/or substance use (MWLLE). The intent will be to design and host an inclusive engagement process that considers the system of funding available for MWLLE and considers the following questions:
 - What types of supports are mothers seeking in their healing and wellness journey’s?
 - What does the system of capital deployment look like MWLLE, and where are the gaps?
 - What types of social finance tools can be deployed to support the advancement of wellness and belonging for MWLLE?

The work will also convene a ‘Mother’s Circle’ to support and guide the process, with the key goal of considering power dynamics and structure of the resulting ‘fund’. Our intent will be to share key learnings and insights ‘out loud’ in real time to support knowledge transfer and capacity building across the financial and philanthropic sectors. We anticipate a fund of this sort would support individuals experience poverty in the Province.

Closing

We are grateful for the opportunity to provide you with a series of ‘innovation’ focused opportunities that may inform and support the update to the TogetherBC Strategy. We are pleased by the momentum created by the first TogetherBC Strategy, and the actions the province has taken to support poverty reduction since. At this juncture, we observe a need and an opportunity to consider deeper and more transformational innovation to accelerate poverty reduction in the Province. We would be excited to keep discussing these ideas and to explore how we might contribute to the TogetherBC update.

Sincerely,



Erin Welk

Co-CEO, Urban Matters CCC

Submission on the BC Poverty Reduction Strategy Update

As Canada's largest community-based credit union, Vancity uses the tools of finance and our community relationships to expand economic opportunity, improve the wellbeing of our members, and make our communities better. Founded in 1946 to provide financial services to people from all walks of life, we now offer a full range of financial products and services for individuals, businesses, and not-for-profit organizations, including daily banking, investments, mortgages, loans, and credit cards.

Like the Government of B.C., Vancity is committed to the financial well-being and resilience of British Columbians. To us, that means more than lifting people out of poverty — it is about transforming our economy to one that guarantees equity for all, and ensuring people have access to the resources they need. Not only is this the right thing to do, but in times of economic uncertainty, creating more financially resilient communities is critical to our province's social and fiscal health.

And we know it can be done. While many were hit hard by the COVID-19 pandemic, most Canadians' financial resilience¹ improved during the first year — thanks in large part to government supports.^{i,ii} These investments, which built on top of recent government action in areas like childcare, housing, and income assistance, made a profound difference in peoples' lives. However, we are now seeing a decline in financial resilience, particularly for low-income households.² Combined with the impacts of inflation, many Canadians are now struggling to meet their basic needs, let alone build any financial safety net. As just a few examples:^{iii,iv}

- 78% of single parent households are living pay cheque to pay cheque, while 1 in 4 have deferred loan or credit card payments.
- For Canadians not working because of a disability, nearly half are unable to get or afford the food they need, and 17% are not able to pay their bills on time. 85% report that money worries negatively impact their mental health and 70% report it impacts their physical health.
- 46% of low-income households have a liquid savings buffer of 3 weeks or less and 66% have a negative or zero saving rate.

¹ The Seymour Financial Resilience Index™ measures a household's financial resilience, defined as their ability to get through financial hardship, stressors, and shocks as a result of unplanned life events. For details, see the Financial Resilience Institute's [scoring and methodology](#), and [reports](#).

² Low income is defined here as a household income under \$25,000 and households of more than one individual with a household income of under \$50,000 (i.e. excluding single person households with a household income between \$25,000 and \$50,000).

Vancity supports the comprehensive, cross-government approach taken in TogetherBC. And ensuring all British Columbians have a dignified and economically secure life requires government to continue building on this foundation with additional investments in financial supports and public services, changes to policy, and more. In this submission, we focus on five priority action areas for the next poverty reduction strategy. While not a complete list of the actions needed, these measures would have a substantial impact on addressing both the depth and breadth of poverty in BC and would help keep families out of poverty.

Safe housing for all

Secure housing is a cornerstone of peoples' wellbeing. However, many households in our province — including middle-income earners — are struggling to meet the cost of this basic necessity. A third of renter households in BC are paying more than 30% of their income towards housing.^v That average hides even more dire numbers. For example, more than half of renters who live alone in Vancouver pay more than 30% of their income towards rent, while thousands of people have been pushed out of the market altogether and into homelessness.^{vi}

Lack of access to safe housing also leaves people exposed to the extreme weather we're facing in the climate crisis. During the 2021 heat dome in BC, of the 600+ people who died, 98% were in their homes.^{vii} Energy inefficient buildings also lead to high energy costs for households who can least afford them.

Recommendations

- Use all of the regulatory and fiscal tools available to the Province to support the construction of tens of thousands of low- and middle-income units of publicly and privately owned rental housing each year.
- Prioritize the funding and building of supportive housing (with integrated care) and transition housing to meet the current need.
- Develop an action plan to make all existing buildings climate safe and zero-emissions by 2040, starting with low-income and Indigenous housing. Include full coverage income-qualified retrofit programs, similar to what governments in New Brunswick, Nova Scotia, and Prince Edward Island have done.
- As an immediate interim measure, provide portable air-conditioners or window-unit heat pumps to people who live at or below the poverty line as Oregon has done.

Resources for a dignified life

Despite incremental increases to income and disability assistance in recent years, the gap between these rates and the poverty line (i.e. the Market Basket Measure) remains substantial, leaving people in chronic deprivation. This poverty has immense costs, both for the people who are forced to live in a constant state of hunger, stress, and precarity, and for society more broadly.^{viii}

Vancity strongly supports the Government of BC's recent increase of supports such as the BC family benefit and the climate action tax credit. However, approximately 13% of British Columbians don't file a tax return; as a result, thousands of people aren't receiving benefits which they are eligible for.^{ix}

Recommendations

- Increase income and disability assistance rates to the poverty line (Market Basket Measure) and index rates to changes in the poverty line.
- Combine the shelter and support allowance components of income and disability assistance payments.
- Increase earnings exemptions for those receiving income and disability assistance and end the claw back of unearned income.
- Lift asset limits that are preventing people from building resilience and a safety net. Structure the system so that it supports people to plan ahead and move towards self-sufficiency instead of penalizing them for doing so.^x
- Make it easier to access benefits tied to the tax system by simplifying the tax system and introducing automatic tax filing.^{xi}
- Index benefits to inflation or a similar metric to ensure the value does not erode over time.
- Where appropriate, consider providing one-time lump-sum cash transfers to prevent people from falling into, and/or becoming entrenched in, poverty.

Allowing people to maintain a small amount of savings and other resources helps build their resilience and ability to transition off of government supports.

Through the New Leaf Project, a group of BC residents received a one-time lump-sum cash transfer of \$7,500. On average, the recipients:

- moved into stable housing faster than non-cash participants and spent fewer days homeless.
- prioritized and increased spending on recurring staples like housing/rent, food, transportation, and utility bills.
- spent their cash over time, not all at once.
- reduced spending on goods such as alcohol, drugs or cigarettes.

Another example of one-time cash transfers are grants provided through the BC Rent Bank system which have helped hundreds of households stay housed over the past few years.^{xii}

Access to financial services

Access to affordable basic banking services is something that most people take for granted but remains out of reach for many who need it most. While there is a lack of data, it is likely that thousands of people in BC are unbanked, with many more underbanked and using fringe financial institutions (payday lenders, etc.)^{xiii} which charge high interest and fees that eat into people's already marginal finances. There are varied reasons as to why people do not have access to or regularly use credit unions or banks; however, challenges with ID are one common reason.^{xiv}

Recommendations

- Reduce administrative barriers to obtaining government identification, speed up processing times, and waive fees for low-income people.
- Create, and increase support for existing, ID storage facilities.
- Work with credit unions and banks to improve access to inclusive, affordable banking services.

Vancity is exploring models for how we can better serve low-income people and First Nations communities, building on offerings such as Pigeon Park Savings in the Downtown Eastside and our Cormorant Island Community Branch which provides banking access for the remote community of Alert Bay and the 'Namgis First Nation. We would welcome discussions with government on how we might work together to support these communities.

Financial empowerment

Financial empowerment is a broad set of activities, including financial information, education, and coaching; tax filing and benefits assistance; help accessing safe and affordable financial products and services; connection to saving and asset building opportunities; and consumer protection and education. Financial empowerment activities are not a substitute for bringing British Columbians above the poverty line, but are complements which can improve financial outcomes such as improved credit scores, savings, and debt levels, and access to and success with things like education, employment, and housing.^{xv}

Low-income British Columbians are generally not well-served by traditional providers of financial advice. In addition to access challenges, most financial advisors are not familiar with the complexities and interactions of government assistance and benefit programs, and the advice they offer is not a good fit for the knowledge, experience, and needs of lower-income folks.^{xvi}

While community organizations have done their best to fill the gap, they only have capacity to deliver financial empowerment services to a small share of people who could benefit. Insufficient funding for these services also means they are not offered consistently, which can make them difficult to access and refer people to.^{xvii}

Recommendations

- Strengthen and expand funding to community organizations providing free financial help and services specifically designed for community members who are low-income and/or otherwise not well-served by conventional offerings (seniors, youth, newcomers, Indigenous peoples, etc.).
- Ensure all government service providers (such as case managers) deliver advice and support tailored to the knowledge, experience, and confidence of recipients.^{xviii}

Prioritize Indigenous Poverty Reduction

Indigenous-specific poverty reduction measures must be prioritized and led by Indigenous nations and organizations, in line with the Declaration on the Rights of Indigenous Peoples Act and its corresponding Action Plan.

Conclusion

There are many other key government actions that have not been highlighted in this submission. These include continuing to expand access to public services such as childcare, post-secondary education, skills training, and health care, and policy changes that enable people to access resources and remove barriers to employment, like foreign credentials recognition. Vancity strongly encourages the Government of BC to continue investing in and making changes to these areas as part of the updated Poverty Reduction Strategy.

We applaud the work this government has done to build a strong foundation for our province and support you in continuing to invest in the people of BC. As a financial co-operative we know we are stronger when we work together, and Vancity is a committed partner with the Government of BC in eliminating poverty in our province. As BC moves forward with updating TogetherBC: BC's Poverty Reduction Strategy and the Poverty Reduction Strategy Act, and reviewing the BC Employment and Assistance program, we encourage the Government to engage Vancity as a collaborator.

About Vancity

Vancity is a values-based financial co-operative serving the needs of its more than 560,000 member-owners and their communities, with offices and branches located in Metro Vancouver, the Fraser Valley, Victoria, Squamish and Alert Bay, within the unceded territories of the Coast Salish and Kwakwaka'wakw people. With \$33 billion in assets plus assets under administration, Vancity is Canada's largest community credit union.

ⁱ [Low Income Canadians Financial Resilience Report](#)

ⁱⁱ [Disaggregated Trends in Poverty from the 2021 Census of Population](#)

ⁱⁱⁱ [Low Income Canadians Financial Resilience Report](#)

^{iv} [Financially Vulnerable Ecosystem Report](#)

^v [Housing Indicators, 2021 Census](#)

^{vi} [2020/21 Report on Homeless Counts in B.C.](#)

^{vii} [Extreme Heat Death Review Panel Report](#)

^{viii} [The Cost of Poverty in BC](#)

^{ix} [Who Doesn't File a Tax Return? A Portrait of Non-Filers](#)

^x [Basic Income, Financial Literacy and Financial Capability: How Do We Get Better Alignment?](#)

^{xi} [Income Tax Filing and Benefits Take-up 2019](#)

^{xii} [BC Rent Bank 2021-22 Impact Report](#)

^{xiii} [Basic Income, Financial Literacy and Financial Capability: How Do We Get Better Alignment?](#)

^{xiv} [Fringe Financial Institutions, the Unbanked, and the Precariously Banked: Survey Results from Prince George, BC](#)

^{xv} [Financial Empowerment: What it is and How it Helps Reduce Poverty](#)

^{xvi} [Basic Income, Financial Literacy and Financial Capability: How Do We Get Better Alignment?](#)

^{xvii} [Basic Income, Financial Literacy and Financial Capability: How Do We Get Better Alignment?](#)

^{xviii} [Basic Income, Financial Literacy and Financial Capability: How Do We Get Better Alignment?](#)

Honourable Sheila Malcomson
Minister of Social Development and Poverty Reduction
PO Box 9058 Stn Prov Govt
Victoria, BC
V8W 9E2

April 28, 2023

Re: VCH Office of the Chief Medical Health Officer TogetherBC Review Submission

Dear Minister Malcomson,

Vancouver Coastal Health's (VCH) Medical Health Officers are pleased to provide a submission in response to the consultation on how to update "TogetherBC: B.C.'s Poverty Reduction Strategy". The adverse effects of poverty continue to impact the health of many British Columbians, with Indigenous communities, children, seniors, individuals living with disabilities, and those facing mental health and substance use issues being particularly vulnerable. We support the Ministry of Social Development and Poverty Reduction (MSDPR) in stated goals to continue reducing poverty in BC and to set new poverty reduction targets by 2024, while ensuring future actions support those who need it most.

While addressing poverty has many interrelated components, from a healthy public policy perspective we have focused our submission on early childhood development (ECD) due to the profound and lasting effects that experiences of poverty in early childhood can have on individuals, families and communities. By investing in early childhood, poverty reduction efforts can have a significant impact on long-term outcomes for individuals and communities across BC. Outlined below are key areas of focus for policy action on poverty and early childhood, these include measures which: support families raising children with complex and extra support needs, contribute to a publicly-funded and coordinated universal child care system that prioritizes Indigenous early learning and care, prioritize the perspectives and needs of equity-denied populations, and continues to strengthen critical income supports for families raising young children.

Poverty and Early Child Development in BC

Since 2007, the World Health Organization has formally recognized the critical importance of the early years (now considered to be the ages of 0-8), in influencing our life-long health and well-being, and identified ECD as a key determinant of health (Irwin et al., 2007). Poverty and economic marginalization are considered to be two root causes of Adverse Childhood Experiences (ACES), which can negatively impact important social, economic and health outcomes into adolescence and adulthood (ASI, 2022). In terms of health outcomes, children who experience poverty at an early age are more likely to experience adverse impacts on their long-term cognitive, mental, physical and social development.

Experiences of poverty influence the quality of children's daily environments and experiences, as well as their access to important resources and services. Recent data from BC demonstrates how family income affects children's experiences: children living in households with lower income levels have less access to licensed childcare and healthcare services, fewer opportunities for social interactions outside the home, and an increased likelihood of spending more time in front of screens (HELP, 2023a). Further, a family's socio-economic status has shown to be more predictive of early childhood vulnerabilities at age five than important birth factors, such as Apgar scores (Guhn, 2020).

This is critical to address, as children who demonstrate vulnerabilities in social and emotional functioning in kindergarten are more likely to have mental health conditions in early adolescence, and research shows these patterns of progression are visible as early as age five (Guhn, et al., 2020; Thomson et al., 2021). These are illustrative of the powerful impacts of socio-economic status, which influences children's opportunity structures, supportive environments and daily experiences, which then influence their overall health and development across their life course.

In BC and other jurisdictions across Canada, the Early Development Instrument (EDI) is used to track and monitor children's healthy development and readiness for school by entry to kindergarten. In 2009, when the EDI vulnerability rate was 28.7%, the provincial government set a target to reduce the rate to 15% by 2015 (Province of British Columbia, 2009). The EDI vulnerability rate in BC is the highest in Canada, and although it stabilized between Wave 7 (2016-2019) and Wave 8 (2019-2022), the provincial rate has now increased to 32.9%. Yet this does not provide the full story: EDI data released in 2023 showed that 27% of children in the highest income quintile in BC were considered vulnerable in at least one area of development, while this rate increased to 42.6% for children in the lowest incomes quintile (HELP, 2022).

Similar patterns of poverty and early childhood vulnerability also appear across communities in the VCH region. For example, early childhood (ages 0-5) poverty rates range from a low of 11% in Greater Vancouver to 37% in the Central Coast region, with Powell River/qathet region representing the second highest child poverty rate of 17.2% (Statistics Canada, 2023). Currently, the EDI vulnerability rate in Vancouver Coastal health is 32.5%, although across VCH's Local Health Areas (LHAs), the vulnerability rate ranges from a low of 22.1% in North Vancouver (Greater Vancouver) and a high of 46.8% in the Bella Coola Valley (Central Coast region) (HELP, 2023b). Additionally, across the VCH region, 89.1% of families earning less than \$20,000 annually indicated they had lost access to childcare for children ages 1-4 during the pandemic, compared to 68.9% of respondents earning \$140,000 or more (BCCDC, 2021).

As demonstrated in the data above, inequities exist between communities in the VCH region when it comes to both poverty and early childhood development outcomes. Children living in lone-parent households have a risk of living in poverty that is six times higher than children in two-parent households. For lone-parent households with one child where parents earn minimum wage, the poverty gap between earnings and the before-tax poverty line is approximately \$16,000 whereas the poverty gap for two-parent households with two children is approximately \$8,500 (First Call 2023). Further, the ongoing legacy of the impacts of colonization on Indigenous peoples in BC, leading to intergenerational trauma and poverty, continues to have immense impacts on First

Nations, Metis and Inuit children living in BC. The poverty rate for Indigenous children living on reserve is 25.2%, increasing to 33.9% for children living on rural reserves (First Call, 2023).

Increasing Investment to Support Children in Their Early Years

Given there are sub-populations of children who are more at risk of living in poverty than others, we encourage the province to prioritize equity in the creation of poverty reduction legislation and associated investments and set targets to reduce rates of poverty specifically for equity-denied populations. There is a need to highlight, more specifically, inequities and approaches that address the needs of equity-denied populations who are at highest risk of social and economic marginalization, and experiencing child and family poverty. These may include, but are not limited to, single-parent households, First Nations, Metis and Inuit, Black and People of Colour and 2SLGBTQIA+ populations.

The progress made in reducing poverty in BC has made a significant difference in the lives of many families raising children. Much of the recent progress can be attributed to pandemic income relief measures including the Canada Emergency Response Benefit (CERB) and the BC family benefit. In 2020, between both federal and provincial transfers, the child poverty rate was reduced from 35.3% to 13.5%, which represents a larger reduction that was achieved by transfers in 2019 (46.4% reduction, First Call, 2023). Importantly, 2022 also marked the first time in 20 years where the provincial EDI vulnerability rate did not increase significantly (HELP 2022). Maintaining and strengthening provincial government transfers, such as the BC family benefit, for low-income households and individuals, and indexing to inflation, needs to be prioritized if we are to continue the current momentum in reducing child poverty rates in BC.

Additional opportunities to strengthen investments into early childhood development include measures that improve funding and supports, and reduce barriers to services and interventions for families raising children with disabilities and complex needs. As important are investments into initiatives that support healthy infant development and maternal/parental health. We encourage the province to continue prioritizing childcare investments in the 2023 budget and beyond to establish the centralized and coordinated expansion of a universal childcare system of high-quality, inclusive child care for BC children and families. This includes: the removal of fees for families with annual incomes under \$45,000; creating sufficient licensed child care spaces for all who choose them, especially families with children with extra support needs; ensuring there are adequate resources and support for the implementation of the Indigenous Early Learning and Child Care Framework and the timely adoption of a wage grid that ensures early childhood educators are paid compensation that reflects their education and the importance of their contributions to early childhood development.

Finally, we encourage the province to include EDI vulnerability targets and re-employ the EDI as a key indicator in the renewal of TogetherBC to ensure ECD remains at the forefront of our poverty reduction efforts.

Progress and the work ahead

Vancouver Coastal Health's Medical Health Officers acknowledge the progress made in reducing poverty in BC, particularly in light of the pandemic income relief measures. We appreciate the Province's continued attention on poverty and current poverty reduction measures to date; in particular investments to support children and families. However, it is crucial to continue to prioritize equity and address the specific needs of vulnerable populations.

To further support early childhood development and reduce poverty rates in BC, we recommend maintaining and expanding provincial government transfers for low-income households, as well as investing in a universal childcare system. This will provide a strong foundation for healthy development and future success for children across the province, ultimately improving the long-term health and well-being of all British Columbians.

We appreciate the opportunity to contribute to the TogetherBC consultation and look forward to working collaboratively with MSDPR and other government ministries to create a healthier, more equitable future for all residents of British Columbia.

If you have any questions, please feel free to contact us.

Regards,



Mark Lysyshyn MD MPH FRCPC
Deputy Chief Medical Health Officer
Vancouver Coastal Health



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Reforming B.C.'s Income Assistance and Employment Programs

Urban Core Policy Statement and Action Plan

Prepared for submission to the BC Poverty Reduction Strategy Consultations
February 2018

Urban Core is a volunteer-run network of nonprofits, businesses, and individuals who deliver social services and are committed to supporting a continuum of economic strategies that provide a sustainable livelihood and improved incomes for Vancouver Downtown Eastside residents and beyond. Many members of Urban Core are formal partners with the provincial or municipal government in their work and serve British Columbians who require Income Assistance (IA) and employment services. We offer the following submission on reforming IA and the Employment Program of BC (EPBC) based on this experience. Urban Core members support the recommendations of the BC Poverty Reduction Coalition and Raise the Rates and present our recommendations as complementary.

For many in British Columbia, attaining economic self-sufficiency is an extended process due to health and education challenges. Existing IA programs and the EPBC do not account for this reality within their inflexible requirements, often removing supports at critical junctures, and denying non-Employment Insurance (EI) eligible clients access to certain training programs. For those whose economic self-sufficiency is temporarily or indefinitely beyond reach, multiple barriers prevent access to relevant income supports. The eligibility requirements of specific IA programs such as Persons With Disabilities (PWD) or Persons with Persistent Multiple Barriers (PPMB) present further obstacles for some of British Columbia's most marginalized applicants.

Despite the best efforts of service providers, IA workers and WorkBC contract holders, the existing systems are not working for many of the people who need them most. This submission outlines a number of recommendations for BC IA and employment programs. These recommendations address the issues outlined above and provide pathways for government to support British Columbians in their ongoing effort to achieve stability and self-sufficiency, contribute to community prosperity and produce savings to government in health and emergency interventions.

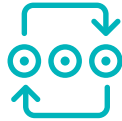


Barriers to access and misdesignation



Problems with current system

- The IA application is too complicated and lengthy.
- The online IA application system poses a significant challenge for those who lack digital literacy or access to technology. In several instances, applicants seek assistance from advocates, literacy organizations and employment support workers, who are not adequately resourced for this work.
- Many people with significant barriers to employment are struggling on basic IA (designated Employment Obligated 'EO') due to accessibility barriers and outdated eligibility criteria to access PWD and PPMB IA categories.
- Barriers to access IA are so high that some marginalized citizens aren't able to access IA at all, resulting in increased homelessness, illness and despair, and costs for health and emergency services.



Recommended Actions

- **Improve the IA application process.** (1) Work with BC government Service Design team to identify and eliminate the most frequently cited barriers to accessing IA information and services. (2) Provide in-person services to help individuals complete IA applications.
- **Strengthen community supports.** (1) Compensate community agencies providing IA application advocate services appropriately. (2) Seek opportunities to co-locate IA officers within existing community services.
- **Improve access to PWD and PPMB IA categories.** Specifically (1) reform IA applicant categorization process to ensure individuals are categorized appropriately and quickly. (2) Update the eligibility tool for PPMB status to recognize mental health and addictions as barriers to employment. (3) Eliminate 12-15 month waiting period to access PPMB IA designation.
- **Commit to continual improvement.** (1) Consult end users in the IA reform process. (2) Develop ongoing feedback mechanisms to ensure optimal user experience.



Desired Outcomes

- IA information and services are deemed accessible, streamlined and personalized by those who use them.
- IA recipients have timely and friendly online and in person channels to ask questions about IA, they feel welcome to ask questions and are satisfied that their questions are answered.
- Government workers feel satisfaction and fulfillment by offering personalized service to IA clients.
- Individuals are able to easily access the appropriate IA category to meet their needs and abilities, particularly PPMB and PWD.
- IA recipients have ongoing ability to contribute to the design and optimization of services.

Problematic IA distribution and exemptions



Problems with current system

- Cumbersome, bureaucratic protocols, such as the once-monthly issuance of cheques to be picked up in person at limited outlets, are time-consuming for IA recipients and undermine their ability to pursue work opportunities.
- Once-monthly synchronized IA payments are correlated with sharp increases in community-wide harm.
- There is widespread misunderstanding about earnings exemption limits and losing benefits. Individuals report significant fears about declaring earnings and 'clawback', disincentivizing seeking or increasing work.



Recommended Actions

- **Develop a new evidence-informed distribution framework that emphasizes convenience and community wellbeing.** Consult investigators leading the BC Centre on Substance Use's 'Cheque Day Study' on the potential impacts of changing payment timing and frequency. Also seek input and feedback from recipients of IA and employers to develop framework.
- **Alleviate pressure on the most vulnerable IA recipients.** Remove the arbitrary earnings exemption limits and clawbacks for PPMB and PWD clients.
- **Eliminate the application of the two year financial independent test.** Additionally, acknowledge it as a misguided strategy for promoting self-reliance.



Desired Outcomes

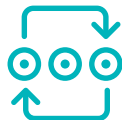
- IA distribution does not negatively disrupt or impact people's lives, ability or desire to work, and supports community health and safety.
- British Columbians living well below the poverty line are not subject to arbitrary and punitive policies that disincentivize working or reporting earnings.

British Columbians fall through the cracks of EPBC



Problems with current system

- WorkBC contract agreements make it difficult for contract holders to work with the hardest to employ clients. The single goal of moving people off of assistance deters people with barriers to employment from accessing employment services.
- Many training programs are only accessible for EI-eligible individuals, excluding many people facing barriers to employment.
- Many people in need of employment services have had a lifetime of negative interactions with government systems including education and legal, and are unwilling to walk through the door of 'institutional' WorkBC centres.
- People who 'fall through the cracks' are seeking support from non-profits, social enterprises and literacy organizations, which are not adequately resourced for this work.
- There is little to no recognition of the value of volunteer, casual, or part-time work as part of a continuum of income generating strategies that lead to better health, economic, and community outcomes. This is particularly true for EO clients.



Recommended Actions

- **Reform the Employment Program of BC.** (1) Pause the procurement process for 2019 WorkBC Contracts. (2) Renew existing contract holders for 1 year. (3) Conduct a thorough review of the Employment Program of BC, engaging with end users and with WorkBC contract holders.
- **Invest in community supports.** Create flexible and sustainable funding for social enterprises and non-profits that are filling gaps in Ministry service provision.
- **Embrace the full income generation continuum.** (1) Recognize and create funding streams that support non-traditional employment as part of a continuum of income generation that promotes better health, economic and community outcomes - do not limit these to PWD IA recipients. (2) Look to emerging innovation models, such as EMBERS Eastside Works (formerly 'The Lux') low-barrier income generation hub and other community-based trainers to advise on policy reform.
- **Develop new ways to measure success.** Better housing, health, and social and educational outcomes are better markers of a successful program than whether someone has left income assistance.



Desired Outcomes

- Employment services are provided on a person-centered basis, where integrated, customized, and sustained support lead to greater stability as an outcome.
- Integrated IA and employment programs recognize and support the broad range of ways in which people earn income that may not fit into the traditional view of a 40-hour work week.
- Non-traditional, flexible and/or community-based employment and volunteer opportunities are recognized and supported as legitimate training or transitional work opportunities.

Acronyms

- IA = Income Assistance
- EPBC = Employment Program of BC
- EI = Employment Insurance
- EO = Employment Obligated
- PPMB = Persons with Persistent Multiple Barriers
- PWD = Persons With Disabilities

For media requests and inquiries please contact:

cedcoordinator@ledlab.ca

30 organizations showed their support for this Policy Position statement, including:

Binners' Project
Bioluminous Solutions
Canadian Centre for Policy Alternatives
Carnegie Community Centre
CleanStart
Downtown Eastside Neighbourhood House Society
DTES Street Market Society
EMBERS
Employ to Empower
Exchange Inner City
First United Church Community Ministry Society
Hastings Crossing Business Improvement
Association
Hives for Humanity Society
JustWork Economic Initiative
Keep
Livable Income Vancouver
Local Economic Development Lab
Lookout Housing and Health Society
Mission Possible
Megaphone
PHS Community Services Society
Potluck Cafe Society
Recycling Alternative
Sole Food Farms
The Amp Coworking Space
Union Gospel Mission
Urban Core Community Workers Association
Vancouver Aboriginal Community Policing Centre
Vancouver Foundation
Wood Shop Workers Co-op

More than 100 individuals showed their support for this Policy Position statement, including:

Aaron Munro	Jeff Wint	Nicole Deranleau
Abeer Yusuf	Jenna van Draanen	Nicole Hanbury
Acacia Longoria	Jennifer Breakspear	Nigel Mojica
Adriane King	Jennifer Reddy	Paul Gowan
Alisha Maxfield	Joanna Mendell	Paul Mcarthur
Allison Laing	John Whistler	Peter Josic
Amanda Boggan	Jonathan Guerelle	Petra Klupkova
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Andrew Jack	Katharine Shipley	Rocky James
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Ara Beittoei	Kim Mackenzie	Rose Palo Pal
Ash	King-mong Chan	Samuel Hamm
Austin Lui	Kiri Bird	Sandra Chung
Barry K Morris	Kit Rothschild	Sarah chu
Brenda Kuecks	Konnie Maxfield	Sarah T
Brian Rutledge	Lama Mugabo	Sean Condon
Cassie Plotnikoff	Laura Beamish	Shaughn Schwartz
Charlene Dumont	Leanne Joe	Shawn Smith
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Dr. Alison Taylor	Malwina Lula Czupajlo	Vivian Shirley
Dwayne Flohr	Mark Defreita	William Booth
Eileen Clabburn	marv wheale	Wyanet
Elizabeth Lougheed Green	Marvin Joseph Delorme	
Emily frame	Marylee Stephenson	
Emily Hannah	Matthew Campbell	
Eva Ureta	Michael Leland	
Evan Jones	Milad Parpouchi	
Francis Taban	Molly O'Ray	
Grace Tait	Nadine Leitch	
Graham Anderson	Natalie Porter	
Hollie McKeil	Nicolas D. Leech - Crier	

April 26, 2023

Ministry of Social Development and Poverty Reduction

Via email: BCPovertyReduction@gov.bc

West Coast LEAF's submission re: engagement on BC's updated Poverty Reduction Strategy

Dear Honourable Minister Sheila Malcolmson,

West Coast LEAF¹ welcomes the opportunity to offer input into BC's updated Poverty Reduction Strategy. The following recommendations draw on our [2021 / 2022 BC Gender Equality Report Card](#) ("Report Card"). Grounded in the expertise of 30 community dialogue participants, 26 organizations, and 35 policy experts, the Report Card is an evidence-based assessment of BC's progress on gender equality in economic security and access to healthcare. We urge you to read the full Report Card which contains many findings related to your ministerial mandate.

West Coast LEAF is a member of the BC Poverty Reduction Coalition (BCPRC) and endorses the BCPRC's submission to this consultation. This separate submission outlines how the following seven recommendations are crucial for the realization of substantive gender equality in BC:

- 1. Raise income and disability assistance rates to the poverty line and tie them to costs of living.**
- 2. Implement the BC Basic Income Panel's recommendations on income supports, and end the spousal cap.**
- 3. Add social condition to the BC *Human Rights Code* as a protected ground.**
- 4. Enact vacancy control and massively expand construction of affordable, dignified, non-market housing.**
- 5. Prioritize implementing targeted Indigenous poverty reduction measures.**
- 6. Make public transit fare-free and create a publicly owned intercity or inter-regional bus service.**
- 7. Close the gap between the minimum and living wages.**

Poverty, and its profoundly harmful impacts, are gendered.

Gender-based discrimination, including gendered barriers to employment, and the systemic devaluation of feminized work, mean that women and people who are marginalized based on gender² experience disproportionately high rates of poverty and precarious, low-wage work³. This is especially true for those also impacted by racism, ableism, and/or colonial displacement and violence.⁴ It is these same groups who bore the brunt of pandemic-related job losses (e.g., in accommodation and food services sectors).⁵

Poverty is both a cause and an outcome of gender-based violence. Poverty increases the risk of gender-based family violence and, alongside a lack of safe, affordable housing, is a primary barrier to leaving violent situations.⁶ Gender-based violence and abuse is thus "a major pathway to homelessness"⁷ leading to further increased risk of violence in precarious living situations, encampments, and public spaces.⁸

Poverty also increases reliance on forms of work that are criminalized, unprotected and/or dangerous. Gender-based discrimination limits work options and increases risk of harassment and violence while working.⁹ For instance, Report Card dialogue participants who did sex work frequently experienced misogynistic and/or transphobic harassment and violence while working – including from police officers.

Poverty has further, devastating, impacts on families whose children are targeted for removal by BC’s so-called “child protection” system – which is more aptly described as system of “family policing.”¹⁰ Within this system, “apprehension is frequently based on poverty construed as neglect, which punishes parents for being poor.”¹¹

BC is obligated to eliminate gender-based discrimination, including through its Poverty Reduction Strategy.

BC has a responsibility to implement and ensure compliance with international treaties that relate to matters under provincial jurisdiction.¹² For instance, The Convention on the Elimination of All Forms of Discrimination against Women (CEDAW) recognizes that it is not enough to guarantee that women and men are treated the same. Rather, state signatories must take appropriate action to eliminate discrimination against women and support substantive equality.¹³ Likewise, the United Nations Declaration on the Rights of Indigenous People (UNDRIP) specifies that states must ensure continued improvement of economic and social conditions and ensure full human rights protections for equity-denied groups including women, elders, youth, children and persons with disabilities.¹⁴ BC’s *Declaration on the Rights of Indigenous Peoples Act* requires that the province take all necessary measures to ensure that BC’s laws are consistent with UNDRIP.¹⁵ The Yogyakarta Principles extend international human rights protections to non-discrimination and equity on the basis of one’s sexual orientation, gender identity, gender expression and sex characteristics.¹⁶

West Coast LEAF’s recommendations:

1. Raise income assistance and disability assistance rates to the poverty line and tie them to costs of living.

BC’s income assistance (IA) and disability assistance rates continue to be grossly insufficient, imposing deep poverty on people throughout the province.¹⁷ Modest rate increases in the past two years have been significantly eroded by historic rises in inflation and costs of living.¹⁸ This ongoing – and legislated – deep poverty causes gendered harms.

“
Income and disability assistance are nowhere near enough to cover the basic cost of living, let alone cover extra expenses.

- COMMUNITY DIALOGUE PARTICIPANT

The disproportionate representation of women and people marginalized by gender in part-time, temporary, and precarious work increases the likelihood that these groups may need to rely on income from IA. BC’s very low IA and disability assistance rates disproportionately harm families led by single women and single birth parents of other genders. Of families with children who receive IA, 79% are single parent-led. In BC, 80% of single parent families are led by women.¹⁹

These inadequate rates are significant barriers to leaving violent or abusive situations. BC’s Basic Income Panel (the Panel) notes that over half of people experiencing violence in Canada also experience financial abuse, indicating both financial dependency and a serious lack of financial resources. The Panel stresses that “IA does not provide sufficient income to a person who has fled with nothing.”²⁰

In our Report Card dialogues, insufficient income supports meant that many participants relied on informal living arrangements (such as renting a room in a unit with strangers) that were crowded, unsafe, and poorly maintained. This also meant they could not access shelter-related benefits. Dialogue participants called for increases in IA rates tied to inflation, not temporary measures like one-time credits. Community-based calls to increase rates of financial assistance are supported by numerous expert reports, including the National Inquiry on Missing and Murdered Indigenous Women and Girls (the National Inquiry)’s Calls for Justice, the First Nations Leadership Council’s Report on Income Supports and Indigenous Peoples, and the final report of BC’s Basic Income Panel.²¹

2. Implement the BC Basic Income Panel's recommendations on income supports, and end the spousal cap.

BC's complex, restrictive, and fragmented array of income supports often renders them inaccessible to people most in need of support – including many vulnerable women and people facing gender-based discrimination. In 2020, the province appointed an expert Basic Income Panel to undertake a rigorous, comprehensive, multi-year analysis of these shortcomings.²² However, BC has yet to fully implement the Panel's recommendations.

Report Card dialogue participants faced many of the gaps and barriers observed by the Panel, including inadequate supports for those engaged in low-wage and precarious work which is disproportionately carried out by women, Indigenous people, and people of colour.²³ The IA program's employment obligations also create barriers for parents with young children – especially single parents – who cannot afford suitable childcare.²⁴ Further, income supports reflect discrimination against sex workers who are predominantly women and people marginalized based on their gender.²⁵ Likewise, BC's income supports are insufficient to support people facing major life transitions, including youth aging out of care and people leaving gender-based violence and abuse. The Panel notes that “available government supports for people fleeing violence are inadequate for both the number and needs of people fleeing violence, [with] barriers to access that prevent them from fully supporting a person's autonomy from the abuser.”²⁶

The Panel also highlights gendered, colonial, and racist barriers stemming from risk assessment and surveillance practices associated with family policing. Marginalized women and birth parents – especially those who are Indigenous, who live in poverty, are sex workers, experience mental health issues, or use substances – are disproportionately flagged as “high risk” and targeted for child removal. This creates a culture of fear which limits access to IA and other crucial supports, including childcare. Meanwhile, BC's IA program offers no direct services or supports to assist with parenting.²⁷

Alongside these inadequacies, our Report Card highlights concerns about BC's continued spousal cap on disability assistance, which discounts a partner's income from the rate of assistance disbursed. People relying on disability assistance are thus forced to choose between living with a partner or keeping their income. This restrictive policy has many negative impacts, including deterring people from engaging in serious relationships. It also mandates financial dependence on spouses, which can force people to stay in abusive relationships.²⁸

3. Add social condition to the BC Human Rights Code as a protected ground.

People who experience poverty face stigma, criminalization, and discrimination “in virtually all aspects of economic, social, political and cultural life”²⁹ – including while applying for housing or employment, working, and accessing services. Human rights advocates, including BC's Human Rights Commissioner, have repeatedly called for the inclusion of “social condition” as a ground upon which discrimination is prohibited in BC's *Human Rights Code* (the “Code”).³⁰ Social condition means “inclusion in a socially identifiable group that suffers social or economic disadvantages based on poverty, source of income, occupation, housing status, and education level.”³¹

In August 2022, and in April 2023, hundreds of unsheltered residents were forcibly evicted from Vancouver's East Hastings Street without adequate provisions for safe alternative housing. These evictions have been criticized by BC's Human Rights Commissioner as contrary to human rights law.³² Women-serving organizations emphasize that police-supported decampments exacerbate the violence and vulnerability already experienced by women, especially Indigenous women, in the Downtown Eastside.³³ The addition of “social condition” to the *Code* would extend human rights protections to people sheltering in public spaces and encampments, and those living in informal and/or shared settings or transitional or supportive housing models, where residents are not granted the basic tenancy protections of the *Residential Tenancy Act*.³⁴

Adding Social Condition to the *Code* also increases human rights protections for people who rely on income from criminalized work, such as sex work. Police harassment and surveillance of sex workers is not only a source of harm in and of itself; it also creates barriers to occupational health and safety.³⁵ Because of this surveillance, sex workers are limited in their ability to work in visible settings, screen clients, screen for

weapons and intoxication, check “bad date” reports, work together, work indoors, or set clear boundaries with clients.³⁶

4. Enact vacancy control and massively expand construction of affordable, dignified, non-market housing.

BC’s pervasive lack of affordable and safe housing, exacerbated by an absence of vacancy controls, violates human rights to housing³⁷ and directly contributes to gendered violence and precarity. Lack of affordable housing is not only a barrier to leaving violence; it is also “one of the commonly reported reasons women return to violence.”³⁸ The leading cause of homelessness among women is violence.³⁹ Two-Spirit and LGBTQ+ people also experience violence, poverty, and resulting homelessness at disproportionately high rates.⁴⁰ Further, BC’s absence of vacancy controls incentivizes landlords to evict tenants, creating conditions ripe for discrimination. Landlords regularly discriminate against single mothers, immigrants and refugees, Indigenous people, trans people and people marginalized based on gender, those receiving IA and/or living in poverty, and women leaving violence.⁴¹

Report Card dialogues revealed how BC’s stock of social, supportive, and transitional housing, and its shelter spaces, are grossly insufficient to meet the needs of people facing gender-based marginalization and violence. By 2021, the number of households on a waitlist for social and affordable housing in BC was 26,800.⁴² Some larger households “will remain on the waitlist for well over a decade.”⁴³ In a single day in December 2021, 84 transition housing programs across BC safely sheltered 753 women, children, and youth. But a further 109 people were left waiting for services or turned away.⁴⁴ Trans participants in our dialogues faced additional barriers – for instance, being denied entry at women’s shelters *and* at shelters for men. In 2020-21, a Vancouver shelter for sex workers constantly operated at capacity, turning away women and gender diverse people more than 1000 times during its first year of operation.⁴⁵ Despite BC’s 2018 promise to deliver 1500 units through its Women’s Transition Housing Fund, only about 10% of these units were completed by 2023.⁴⁶

Report Card dialogue participants also described systemic safety and human rights issues in shelters, SROs and social and supported housing. Some public non-profit supportive housing buildings enact pervasive surveillance and restrictions relating to substances, curfews, room checks, guests, or sign-in procedures.⁴⁷ Meanwhile, women and people of marginalized genders commonly face bullying, harassment, discrimination, and violence within shelters and other emergency housing.⁴⁸ BC’s efforts to date do not adequately reflect the transformative, resident-led changes required to address widespread, gendered, safety and human rights issues across BC’s SRO, supportive housing, and shelter systems.

5. Prioritize targeted Indigenous Poverty Reduction Measures

The conditions of deep poverty experienced by many Indigenous individuals, families, and Nations are a direct result of historic and ongoing colonization, genocide, land dispossession, and forced assimilation policies practiced across the lands called Canada and BC.⁴⁹ The gendered impacts of colonial dispossession and violence are significant:

loss of culture... loss of land..., loss of family child-rearing through residential schools, the disproportionately high number of Indigenous children in foster care... the high incidence of gender-based violence, and the crisis of Missing and Murdered Indigenous Women, Girls, and gender-diverse people.⁵⁰

These multiple forms of colonial and gendered violence mean that Indigenous women experiencing poverty “often have to make the impossible decision between staying in an abusive relationship, or becoming homeless and having their children apprehended.”⁵¹ The National Inquiry’s Call for Justice 12.4 calls upon “all governments to prohibit the apprehension of children on the basis of poverty and cultural bias,” and to “resolve issues of poverty, inadequate and substandard housing, and lack of financial support for families, and increase food security to ensure that Indigenous families can succeed.”⁵²

In addition to gender-based discrimination, Indigenous participants in our Report Card dialogues faced anti-Indigenous discrimination in their searches for work and housing. Likewise, national data shows that Indigenous people face higher rates of unemployment irrespective of educational attainment.⁵³

A recent analysis of BC's income supports from the perspective of Indigenous communities has identified numerous systemic and structural barriers including colonization, anti-Indigenous racism, complex systems, and insufficiency of benefits. The same report highlights the need to address stigma and bias in government services and to increase accessible, culturally safe, and in-person services.⁵⁴ The province has promised to review the report's recommendations.⁵⁵ It is now time for substantive action.

6. Make public transit fare-free and create a publicly owned intercity or inter-regional bus service.

We call upon all governments to ensure that adequate plans and funding are put into place for safe and affordable transit and transportation services and infrastructure for Indigenous women, girls, and 2SLGBTQQIA people living in remote or rural communities.

- CALLS FOR JUSTICE NO. 4.8²⁵³

Reliable, affordable, and dignified transportation is key to gender equality in economic, social, and cultural spheres. For women and people marginalized based on gender, inadequate transportation infrastructure is a barrier to accessing work and education, further limiting economic opportunities and earning potential.⁵⁶ The availability of affordable and accessible transportation is directly tied to the ability to meet basic needs and access vital services, such as healthcare, childcare, anti-violence supports, and community food hubs, etc.⁵⁷ The Native Women's Association of Canada has also underscored that "affordable transportation is essential in accessing culture."⁵⁸

Indigenous people, people with disabilities, women, and people who are marginalized based on their gender have distinct safety concerns while on or accessing transit. Their safety is also affected by a lack of transit.⁵⁹ When public transportation is inaccessible, unaffordable, and unreliable, people find other ways to travel, which may put them at increased risk of harm.

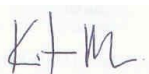
In Northern BC, women, and people who are marginalized based on gender, face unique transportation needs and challenges. Multiple cancellations, cutbacks, and privatizations, especially of bus service, have created a crisis in transportation in Northern BC. Lack of safe public transit is connected to the deaths and disappearances of Indigenous women and people who are marginalized based on gender.⁶⁰

7. Close the gap between minimum wage and the living wage.

Women and people who are marginalized based on gender are more likely to be paid minimum or lower wages, and to be sole parents and caregivers. Caregiving responsibilities and gender discrimination mean that these groups are more likely to have part-time and/or temporary work, which is significantly more likely to pay minimum wages.⁶¹ Feminized sectors including retail, accommodation, and food services are the largest employers of minimum wage workers.⁶²

Our Report Card dialogues reflect how, despite recent increases, BC's minimum wage continues to fall far below living wages for communities across BC. Living wages reflect the hourly wages required to enable a family of four to "meet their basic needs, properly support children and avoid chronic financial stress."⁶³ In Vancouver, for example, the living wage is \$24.08/hour, while minimum wage is only \$15.65.⁶⁴ For lone-caregivers, lone-parents, and non-normative families, the living wage may be higher.

Our seven recommendations reflect vital steps in realizing BC's obligation to end the profound, discriminatory, gendered harms caused by poverty in BC. We thank you for your attention to this submission. Sincerely,



Kate M. Murray, Law and Policy Researcher



Bety Tesfay, Staff Lawyer

References and Notes

- ¹ **West Coast LEAF** is a BC-based legal advocacy organization. In collaboration with impacted communities, we use the law to advocate for an equal and just society for all women and people who experience gender-based discrimination. West Coast LEAF is committed to an inclusive vision of feminism that defends the right to be free from discrimination based on gender identity, gender expression, and sex characteristics.
- ² Throughout this submission, we use the phrase “people who are marginalized based on gender” to indicate all people who face gender discrimination, not only women. This includes Two-Spirit, lesbian, gay, bisexual, trans people of all genders (not only women), queer, intersex, non-binary, and gender non-conforming people.
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- ¹¹ Keeping Families Together, West Coast LEAF, Parents Advocating Collectively for Kin, RainCity Housing and Support Society, Atira Women’s Resource Society, Feminists Deliver, Rosner, F., Dhillion, M.H.K., and Carwana, M. (2022, August 30). Joint Submissions in response to MCFD’s Child, Family and Community Service Legislative Reform, p. 11. <https://www.westcoastleaf.org/wp-content/uploads/2022/09/2022-08-30-West-Coast-LEAF-and-Collective-Submissions-on-BC-CFCSA-Reform.pdf>
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- ¹⁵ Government of British Columbia. (n.d.). Declaration on the Rights of Indigenous Peoples Act. Retrieved November 7, 2022. <https://www2.gov.bc.ca/gov/content/governments/indigenous-people/new-relationship/united-nations-declaration-on-the-rights-of-indigenous-peoples>
- ¹⁶ International Commission of Jurists. (2017, November 10). The Yogyakarta Principles Plus 10 - Additional Principles and State Obligation on the Application of International Human Rights Law in Relation to Sexual Orientation, Gender Expression and Sex Characteristics to Complement the Yogyakarta Principles. <https://yogyakartaprinciples.org/principles->

[en/yp10/](#). See also the annotations to the Yogyakarta Principles setting out the international legal instruments that underlie each principle and state obligation: O’Flaherty, M. & Williams, G. (2007, November). Jurisprudential Annotations to the Yogyakarta Principles. University of Nottingham Human Rights Law Center. <http://yogyakartaprinciples.org/wp-content/uploads/2017/11/Jurisprudential-Annotations.pdf>

¹⁷ First Call Child and Youth Advocacy Coalition. (2022, February). 2022 BC Child Poverty Report Card. <https://firstcallbc.org/bc-child-poverty-report-card/>

¹⁸ Lee, M. (2022, February 24). BC budget moves in the right direction but too slowly to address pressing challenges like housing, climate, toxic drug supply and poverty. Policy Note. <https://www.policynote.ca/bc-budget-2022/>

¹⁹ First Call Child and Youth Advocacy Coalition. (2022, February). 2022 BC Child Poverty Report Card. <https://firstcallbc.org/bc-child-poverty-report-card/>

²⁰ Green, D., Kesselman, J., & Tedds, L. (2020, December). Covering All the Basics: Reforms for a More Just Society. Final Report of the British Columbia Expert Panel on Basic Income, p. 468. https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

²¹ Ibid. See also Kessler, A. & Quinless, J. (2022, April). Income Supports and Indigenous Peoples in BC: An Analysis of Gaps and Barriers. <https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/poverty-reduction-strategy/indigenous-income-support.pdf>; National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019, June). Reclaiming Power and Place. The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls. Calls for Justice (4.7). The National Inquiry. <https://www.mmiwg-ffada.ca/final-report/>

²² Green, D., Kesselman, J., & Tedds, L. (2020, December). Covering All the Basics: Reforms for a More Just Society. Final Report of the British Columbia Expert Panel on Basic Income. https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

²³ Ibid.

²⁴ Petit, G. & Tedds, L.M. (2020, December.) Gender-Based Analysis Plus (GBA+) of the Current System of Income and Social Supports in British Columbia. https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3781918

²⁵ Ibid.

²⁶ Green, D., Kesselman, J., & Tedds, L. (2020, December). Covering All the Basics: Reforms for a More Just Society. Final Report of the British Columbia Expert Panel on Basic Income, p. 468. https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf

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²⁸ van Vloten, S. (2021, September 9). Comment: Stop making disabled Canadians choose between love and survival. The Times Colonist. <https://www.timescolonist.com/opinion/comment-stop-making-disabled-canadians-choose-between-love-and-survival-4691948>; van Vloten, S. (n.d.) Support families: End BC PWD spouse restrictions. BC Disability. Retrieved November 17, 2022. <https://www.bcdisability.com/spousal-cap>

²⁹ Pivot Legal Society. (2019, December). Backgrounder: Prohibiting Discrimination Based on Social Condition Under BC’s Human Rights Code, p. 1. https://www.pivotlegal.org/social_condition

³⁰ Ibid. See also BC Office of the Human Rights Commissioner. (2020, May). Adding “Social Condition” as a Protected Ground to B.C.’s Human Rights Code. <https://bchumanrights.ca/publications/social-condition/>

³¹ Taghaddosi, N. (2022, September 6). Introduction to Anti-Stigma Campaign: Stigma is a phenomenon with real life consequences for individuals. Pivot Legal Society. https://www.pivotlegal.org/stigma_is_a_phenomenon_with_real_life_consequences_for_individuals

³² BC Office of the Human Rights Commissioner. (2023, April 6). Statement from Commissioner Kasari Govender following her meetings with City and Provincial officials on the displacement of residents of the Hastings Street encampments Yesterday. Facebook. <https://www.facebook.com/humanrights4BC/>; BC Office of the Human Rights Commissioner. (2022, August 9). Human rights of the unhoused must be respected when removing tent city encampment. [Media Release]. <https://bchumanrights.ca/news/human-rights-of-the-unhoused-must-be-respected-when-removing-tent-city-encampment/>

³³ Battered Women’s Support Services (BWSS). (2022, August). Women are not acceptable casualties in the response to housing crisis. [Media Advisory]. <https://www.bwss.org/women-are-not-acceptable-casualties-in-the-response-to-housing-crisis/>

³⁴ Taghaddosi, N. (2022, September 6). Introduction to Anti-Stigma Campaign: Stigma is a phenomenon with real life consequences for individuals. Pivot Legal Society. https://www.pivotlegal.org/stigma_is_a_phenomenon_with_real_life_consequences_for_individuals

³⁵ An Evaluation of Sex Workers’ Health Access (AESHA) Project. (2021, June). End Police Harassment & Surveillance to Advance Sex Workers’ Health and Labour rights: During and Beyond the COVID-19 Pandemic. Center for Gender & Sexual Health Equity. https://cgshe.ca/app/uploads/2021/06/AESHA_5-reasons-to-stop-police-surveillance_10_2021.pdf

³⁶ Ibid.; see also Special Committee on Reforming the Police Act. (2022, April.) Transforming Policing and Community Safety in British Columbia, p. 40. Legislative Assembly of British Columbia. https://www.leg.bc.ca/content/CommitteeDocuments/42nd-parliament/3rd-session/rpa/SC-RPA-Report_42-3_2022-04-28.pdf

³⁷ The right to adequate housing is set out in multiple international legal instruments including the Universal Declaration of Human Rights, the International Covenant on Economic, Social and Cultural Rights, and the Convention on the Rights of Persons with Disabilities. It is also enshrined in the Canadian National Housing Strategy Act. (National Housing Strategy Act, SC 2019, c 29, s. 313. <https://laws-lois.justice.gc.ca/eng/acts/N-11.2/FullText.html>). This means that, across Canada, there must be an “affordable, adequate, and suitable home for every household.” (Whitzman, C., Gurstein, P., Jones, C., Flynn, A., Sawada, M., Stever, R., & Tinsley, M. (2021, August.) Housing Assessment Resource Tools. Prototype: City of Kelowna and Findings of a National Survey, p. 1. <https://housingresearchcollaborative.scarp.ubc.ca/hart-housing-assessment-resource-tools/>). Further, Both the Yogyakarta Principles and CEDAW set out the right to adequate housing and protection from eviction without discrimination based on sexual orientation or gender.

³⁸ Knowles, T., FitzGerald, A., Bowman, N., Sekhon, S., & Sagert, E. (2019, March). Getting Home Project: Overcoming Barriers to Housing after Violence – Community Needs Assessment Report, p. 13. BC Society of Transition Houses. <https://bcsth.ca/wp-content/uploads/2021/12/Getting-Home-Project-Community-Needs-Assessment.pdf>

³⁹ Ibid.

⁴⁰ Saewyc, E., Mounsey, B., Tourand, J., Brunanski, D., Kirk, D., McNeil-Seymour, J., Shaughnessy, K., Tsuruda, S., & Clark, N. (2017). Homeless and street-involved Indigenous LGBTQ2S youth in British Columbia: Intersectionality, challenges, resilience & cues for Action. In Abramovich, A. & Shelton, J. (Eds) “Where Am I Going to Go? Intersectional Approaches to Ending LGBTQ2S Youth Homelessness in Canada & the U.S.” <https://www.homelesshub.ca/resource/2-homeless-street-involved-indigenous-lgbtq2s-youth-british-columbia-intersectionality>; Sopotniuk, J., & Obiakor, T. (2013). Poverty is a Queer & Trans issue. BC Poverty Reduction Coalition. https://bchumanrights.ca/wp-content/uploads/2020/09/2013_prc-lgbqt-poverty-factsheet.pdf

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⁴² Statistics Canada. (2022, July 21). Table 46-10-0058-01: Waitlist status including length of time, by tenure including social and affordable housing. <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=4610005801>

⁴³ Report Card Community reviewer correspondence, September 15, 2022.

⁴⁴ BC Society of Transition Houses. (2022, May). 2021 24 Hour Census Report: A One-Day Snapshot of the Transition Housing and Support Programs in BC. <https://bcsth.ca/wp-content/uploads/2022/05/2021-BCSTH-WTHSP-24-Hour-Census-Report-FINALApril-13.pdf>

⁴⁵ WISH Drop-In Centre Society. (2021, October 26). One year after Canada’s first 24/7 shelter for sex workers opened overwhelming demand continues. [Press Release]. <https://wish-vancouver.net/release-wish-shelter-anniversary/>

⁴⁶ Lee, Marc. (2023, February 10). Still so far from home: An update on BC’s 114,000 homes promise. Policy Note. <https://www.policynote.ca/housing-update/>

⁴⁷ Bamberger v Vancouver (Board of Parks and Recreation), 2022 BCSC 49. <https://www.bccourts.ca/jdb-txt/sc/22/00/2022BCSC0049.htm>

⁴⁸ National Advisory Council on Poverty. (2021). Understanding Systems: The 2021 Report of the National Advisory Council on Poverty. <https://www.canada.ca/en/employment-social-development/programs/poverty-reduction/national-advisory-council/reports/2021-annual.html>

⁴⁹ Kessler, A. & Quinless, J. (2022, April). Income Supports and Indigenous Peoples in BC: An Analysis of Gaps and Barriers. <https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/poverty-reduction-strategy/indigenous-income-support.pdf>

⁵⁰ Ibid, p. 30.

⁵¹ Martin, C.M., & Walia, H. (2022, April). Red Women Rising: Indigenous Women Survivors in Vancouver’s Downtown Eastside, p. 20. <https://dewc.ca/resources/redwomenrising>

⁵² National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019, June). Reclaiming Power and Place. The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls. Calls for Justice (12.4). The National Inquiry. <https://www.mmiwg-ffada.ca/final-report/>

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⁵⁵ Minister of Social Development and Poverty Reduction. (2022, April 5). Minister’s statement on Indigenous income supports analysis. BC Gov News. <https://news.gov.bc.ca/releases/2022SDPR0017-000498>

⁵⁶ McDonnell, A. (2019, July 24). Addressing Gender Disparities in Transportation. The Gender Policy Report. <https://genderpolicyreport.umn.edu/addressing-gender-disparities-in-transportation/>

⁵⁷ BC Poverty Reduction Coalition. (2021, December 20). Getting Around to Feed Ourselves Well: Recap. <https://www.bcpovertyreduction.ca/posts-and-releases/gafow>; Linovski, O., Dorries, H., & Simpson, S.A. (2021, December). Public Transit and Equity-Deserving Groups: Understanding Lived Experiences, p. 5. University of Manitoba. https://mspace.lib.umanitoba.ca/xmlui/bitstream/handle/1993/36137/linovski_orly.pdf?isAllowed=y&sequence=2

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- ⁶¹ Dionne-Simard, D. & Miller, J. (2019, September.) Maximum insights on minimum wage workers: 20 years of data. Statistics Canada. <https://www150.statcan.gc.ca/n1/en/pub/75-004-m/75-004-m2019003-eng.pdf?st=-KYIZIGe>; Green, D., Kesselman, J., & Tedds, L. (2020, December). Covering All the Basics: Reforms for a More Just Society. Final Report of the British Columbia Expert Panel on Basic Income, p. 468. https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Final_Report_BC_Basic_Income_Panel.pdf
- ⁶² Dionne-Simard, D. & Miller, J. (2019, September.) Maximum insights on minimum wage workers: 20 years of data. Statistics Canada. <https://www150.statcan.gc.ca/n1/en/pub/75-004-m/75-004-m2019003-eng.pdf?st=-KYIZIGe>
- ⁶³ First Call Child and Youth Advocacy Coalition. (2022, February). 2022 BC Child Poverty Report Card, p. 36. <https://firstcallbc.org/bc-child-poverty-report-card/>
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Organizational Submission- BC Poverty Reduction Strategy

About Women Transforming Cities

Women Transforming Cities (WTC) is a feminist, grassroots non-profit based in Vancouver. We build the participation and power at the local government level of people historically excluded from civic processes and decision-making to radically shift power to gender-marginalized people through a feminist, intersectional lens.

In 2022, we conducted deep community engagement to understand the priority issues for under-represented and marginalized communities and what is required for them to feel a sense of belonging in Vancouver. The findings from this engagement have informed the recommendations included in this submission.

Equity-deserving genders are disproportionately impacted by poverty in BC.

One in five people who identify as non-binary live in poverty¹ and single female seniors have higher rates of poverty than single male seniors.² Trans and gender non conforming people face greater susceptibility to poverty due to their vulnerability to violence, discrimination, and a lack of safe spaces.³ Further, it is crucial that BC's poverty reduction strategy acknowledges that invisible poverty is not reflected in the already alarming statistical data.

The intersectionality of poverty

The application of an intersectional lens is required to understand the causes and consequences of poverty. Intersectionality recognizes individuals as multi-dimensional and existing at the intersection of different identities such as class, age, religion, race, culture, income, and gender, among others. It refutes the efficacy of a one size fits all approach to policy responses and dialogue.

Poverty statistics indicate a disproportionate impact on the basis of identities, such as sex, gender, race, and immigration status. However, statistics do not fully represent the experiences of equity-deserving groups due to limits on extracting intersectional findings. For example, we know that women in BC have higher poverty rates than men⁴, implying that policy interventions should target women. However, this statistic does not consider the implications of colonialism, racism, or ableism that some women experience.

¹ Census in Brief: Disaggregated Trends in Poverty from the 2021 Census of Population

<https://www12.statcan.gc.ca/census-recensement/2021/as-sa/98-200-x/2021009/98-200-x2021009-eng.pdf>

² Gender-Based Analysis Plus (GBA+) and Intersectionality: Overview, an Enhanced Framework, and a British Columbia Case Study (p. 16)

https://bcbasicincomepanel.ca/wp-content/uploads/2021/01/Gender_Based_Analysis_Plus_GBA_and_Intersectionality_Overview_an_Enhanced_Framework_and_a_British_Columbia_Case_Study.pdf

³ Poverty Reduction in Trans, Non-Binary & Two Spirit Communities: A Summary Report for the British Columbia Ministry of Social Development and Poverty

<https://www2.gov.bc.ca/assets/gov/british-columbians-our-governments/initiatives-plans-strategies/poverty-reduction-strategy/2020-trans-plus-report.pdf>

⁴ Statistics Canada. Table 11-10-0135-02 Percentage of persons in low income by sex

Thus, policies such as increasing minimum wage can be useful but may fail to adequately support the policy's targeted groups. For example, people with disabilities are overrepresented in current statistics showcasing deep poverty⁵ and may face additional barriers to employment. Precursory support may be required before they can fully take advantage of the elevation of minimum wage policy change.

People living at the intersections of multiple equity-deserving groups are the most susceptible to poverty and have the least supports. Poverty reduction strategies and the measures of progress must use an intersectional framework to ensure the needs of those made most marginalized are met.

Recommendations

Address violence against Missing and Murdered Indigenous, Women, Girls and Two Spirit People.

- Combatting gender-based violence against MMIWG2S is critical to reducing poverty in BC. MMIWG2S are disproportionately impacted by gender-based violence in Canada, due to ongoing colonial inequities and systemic discrimination and racism. Indigenous women are more likely to be murdered,⁶ and in BC, at least 65% of Indigenous women have been victims of violence in their lifetime.⁷
- Determinants of gender-based violence include a lack of affordable housing and lack of safe spaces. This means that poverty reduction must take a comprehensive approach to address intertwined realities of poverty.
- The National Inquiry into MMIWG has listed several Calls for Justice, including 30 for all levels of government, to help end violence.⁸ We recommend BC's implement a poverty reduction strategy that includes actions that fulfill these Calls, thereby ensuring that the intersectional needs of Indigenous women and girls are met.

Implement vacancy control across BC to advance poverty reduction by increasing housing affordability.

- Introducing vacancy control in BC will be a significant step toward reducing poverty across the province. Residents across BC face housing challenges, especially in the City of

⁵ Building Understanding: The First Report of the National Advisory Council on Poverty (Chapter 3) <https://www.canada.ca/en/employment-social-development/programs/poverty-reduction/national-advisory-council/reports/2020-annual.html>

⁶ Native Women's Association of Canada. (n.d.) MMIWG Fact Sheet. <https://nwac.ca/assets-knowledge-centre/Fact-Sheet-MMIWG-1.pdf>

⁷ Statistics Canada. (2022). Violent victimization and perceptions of safety: Experiences of First Nations, Métis and Inuit women in Canada. <https://www150.statcan.gc.ca/n1/pub/85-002-x/2022001/article/00004-eng.htm>

⁸ National Inquiry into Missing and Murdered Indigenous Women and Girls. (2019). Reclaiming Power and Place: The Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls. <https://www.mmiwg-ffada.ca/final-report/>

Vancouver. Low housing affordability contributes to the vulnerability of low-income residents, those in precarious work situations, and those already facing housing instability.

- In WTC's community survey, 80% of residents indicated that housing was the most critical issue to them during the 2022 municipal elections.
- The lack of vacancy control in BC means that when tenants vacate a unit—including upon eviction and renovation—landlords can raise rent as much as they like. According to CMHC's 2023 Market Rental Report, asking rents for vacant units in Vancouver are 43% higher than rents for occupied units.⁹
- Low-income and long-term tenants are particularly at-risk in the absence of vacancy control as landlords have financial incentive to evict them. Vacancy control would alleviate the eviction incentive and thereby maintain greater affordability for units across the province.

Invest in free or reduced transit fare programs to significantly reduce cost pressures for residents living in poverty.

- Improving public transit accessibility and affordability will be instrumental to poverty reduction in BC. Transit costs are a considerable financial burden, especially for households in large cities¹⁰, which further impacts housing options and affordability.¹¹ In addition, transit influences the safety of Indigenous women, non-binary individuals, unhoused residents, and sex workers.¹² Free and reduced transit fare is especially important now due to inflation and the effect of the COVID-19 pandemic on low-income communities.
- Programs to reduce the burden of transit costs have shown significant success in improving access to employment, education, and community services while also enhancing safety for vulnerable individuals.^{13&14}
- This includes the City of Vancouver's Reduced Fare Transit Pilot and Greater Victoria's Low-Income Transit Assistance Program, which has existed in the region since 1997. The BC Bus Pass Program has also assisted seniors and people with disabilities. Additional efforts to reduce fare for all low-income individuals is urgently needed.

⁹ Canadian Mortgage and Housing Corporation. (2023). Housing Market Information: Rental Market Report. <https://assets.cmhc-schl.gc.ca/sites/cmhc/professional/housing-markets-data-and-research/market-reports/rental-market-report/rental-market-report-2022-en.pdf?rev=8eb3acc0-89b3-49d1-a518-0a381f97b942>

¹⁰ Statistics Canada (2018). Survey of Household Spending, 2017
<https://www150.statcan.gc.ca/n1/daily-quotidien/181212/dq181212a-eng.htm>

¹¹ Metro Vancouver. (2015). Housing and transport cost burden in Metro Vancouver.
<http://www.metrovancouver.org/services/regional-planning/PlanningPublications/HousingAndTransportCostBurdenReport2015.pdf>

¹² Schwan, K., Versteegh, A., Perri, M., Caplan, R., Baig, K., Dej, E., Jenkinson, J., Brais, H., Eiboff, F., & Pahlevan Chaleshtari, T. (2020). Chapter 12: Transportation im: The State of Women's Housing Need & Homelessness in Canada: A Literature Review. Hache, A., Nelson, A., Kratochvil, E., & Malenfant, J. (Eds). Toronto, ON: Canadian Observatory on Homelessness Press.
<https://womenshomelessness.ca/wp-content/uploads/State-of-Womens-Homelessness-Literature-Review.pdf>

¹³ Tamarack Institute. (2022). City of Vancouver Reduced-Fare Transit Pilot: Benefits Beyond Cost.
<https://www.tamarackcommunity.ca/hubfs/Case-study-City-of-Vancouver-reduced-fare-transit-pilot-benefits-beyond-cost.pdf>

¹⁴ Community Council. Low-Income Transit Assistance Program.
<https://communitycouncil.ca/low-income-transit-assistance-program/>

- WTC's community surveys also indicate there is a need to eliminate barriers to accessing existing and future transit rebate programs, such as bureaucracy, lack of digital access, and language barriers.

Expand the frequency and coverage area of transit service to improve transit accessibility and equity.

- Public transportation is a lifeline for many low-income communities as it enables access to employment, healthcare, education, healthy food, childcare, and recreational activities that may not be readily available in their neighbourhoods. People living in places with less or no transit service, such as rural and remote areas, have less access to these needed resources.
- Bolstering transit access and equity is critical to poverty reduction as it enables individuals and families living in poverty to take advantage of services that will improve their livability.

Invest in alternative models of community safety to not exacerbate systemic inequalities

- Ensuring community safety is crucial, but interventions must not exacerbate systemic inequalities and poverty. Criminalizing poverty perpetuates this cycle and contributes to systemic inequality. Therefore, it's essential to prioritize alternative safety models that address poverty's root causes, provide access to basic needs, and leverage community knowledge and values to tackle safety issues effectively.
- Given that policing has failed in multiple aspects of community safety, and disproportionately targets Black and Indigenous communities for criminalization,¹⁵ we recommend divesting from policing and investing in community-led alternatives. This includes non-policing crisis management, mental health interventions, and social support programs determined by those who are criminalized, such as sex workers, people who use illicit drugs, people experiencing mental health challenges, and Indigenous, racialized and low-income people.
- We strongly advocate initiatives that uphold the rights of unhoused individuals, prioritize peer-led solutions, and promote safety for all individuals regardless of their housing situation. By enhancing and increasing access to community, health, social, and peer-based approaches, the BC government can help improve residents' sense of safety and belonging.

¹⁵ Canadian Civil Liberties Association. (2021). Rethinking Community Safety: A Step Forward for Toronto (Report No. 12).
<https://ccla.org/wp-content/uploads/2021/07/Rethinking-Community-Safety-A-Step-Forward-For-Toronto-Full-Report-12.pdf>