



British Columbia's
Office of the Human Rights
Commissioner

Adding “social condition” as a protected ground to B.C.’s Human Rights Code

May 2020

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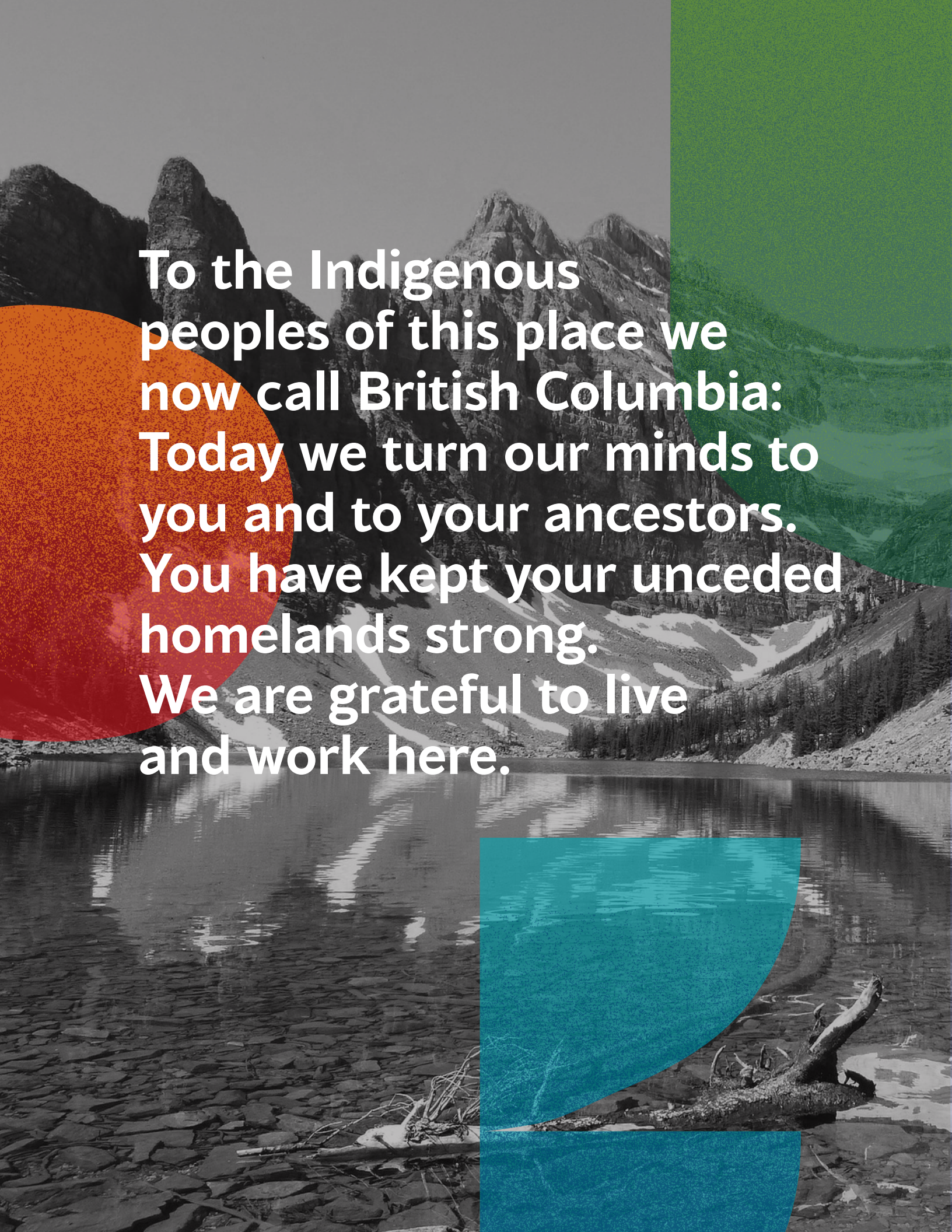
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To the Indigenous
peoples of this place we
now call British Columbia:
Today we turn our minds to
you and to your ancestors.
You have kept your unceded
homelands strong.
We are grateful to live
and work here.

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Introduction

Gaps in human rights protections within the context of COVID-19

In times of stress and uncertainty, human rights violations including discrimination often increase. Policy statements on the human rights implications of COVID-19 from human rights commissions across Canada have highlighted the need to be aware of this.¹ However, there is a harmful disconnect between some of the disproportionate impacts of COVID-19 on people living in poverty and the protections provided under some provincial human rights codes, including B.C.'s Human Rights Code.

As B.C.'s Human Rights Commissioner emphasizes in the introduction to her COVID-19 policy statement:

Like any other context, we must be vigilant about how racism, economic inequalities and classism, ableism, ageism and misogyny may all be factors in how people are treated and how people experience the pandemic.

Both public and private-sector organizations must recognize their human rights obligations and consider the potential disproportionate impacts of COVID-19 on the vulnerable or marginalized groups they employ, house or serve. These groups include immuno-compromised people, older people living alone or in institutions, Indigenous and racialized peoples, people with disabilities, women and gender diverse people and low-income communities.²

All these forms of discrimination and the groups they target are protected within the B.C. Human Rights Code except one. Most of these groups have recourse to justice through the protected grounds of disability, age, race, sex and gender identity and expression. However, the notable and harmful absence is human rights protection for low-income communities because social condition is not included in B.C.'s Human Rights Code.

¹See examples: Policy Statement on Human Rights During the COVID-19 Pandemic from BC's Office of the Human Rights Commissioner; OHRC policy statement on the COVID-19 pandemic from the Ontario Human Rights Commission; Discrimination based on COVID-19 policy guideline from Manitoba Human Rights Commission.

²BC's Office of the Human Rights Commissioner. Policy Statement on Human Rights During the COVID-19 Pandemic. Vancouver, B.C.: BCOHRC, 2020.

The Ontario Human Rights Commission highlights this gap in relation to the important opportunity during this time to embed international obligations we have had for over 40 years within domestic law:

The pandemic also offers a generational opportunity to more effectively realize rights protected in the International Covenant on Economic, Social and Cultural Rights. Many groups are particularly vulnerable to negative impacts from COVID-19 precisely because their economic, social and cultural rights, right to equality and Indigenous rights have not been effectively protected or realized in Ontario and Canada over many decades.³

Discrimination within the context of COVID-19

Rightly so, there has been important attention on the issue of racial discrimination in the context of COVID-19 with multiple mainstream media stories covering the increase in racist incidents. Emphasizing that “xenophobia and racism towards Chinese and other Asian communities have been on a rapid rise since the outbreak of the novel coronavirus,”⁴ the Chinese Canadian National Council Toronto Chapter launched a statement denouncing discrimination and xenophobia in response to the outbreak in January 2020. In B.C., Premier Horgan and Anne Kang, Minister of Citizens’ Services and Parliamentary Secretary for Multiculturalism, have also made statements against racially motivated attacks. The government has re-confirmed their commitment and funding to the provincial initiative, Resilience BC, launched in November 2019 to challenge racism.

Far less attention has been paid to discrimination on the basis of social condition but community advocates on the front lines at the intersection of two public health crises (COVID-19 and the opioid crisis) have highlighted the issue and expressed the urgent need for the added protection of social condition within B.C.’s Human Rights Code.⁵

For example, a significant issue that has been brought to the attention of BC’s Office of the Human Rights Commissioner (BCOHRC) is the application of ‘no guest’ policies in low income social housing. The emergency order pertaining to the Residential Tenancy Act allows landlords to restrict access to “common areas of the residential property” for the tenant or a guest if it is necessary to protect the “health, safety or welfare” of those sharing this property due to the COVID-19 pandemic.⁶

³Ontario Human Rights Commission. Policy statement on a human rights-based approach to managing the COVID-19 pandemic. Toronto, Ontario: OHRC, 2020.

⁴Chinese Canadian National Council, Toronto Chapter. “COVID-19 Racism in Canada Incident Reporting.” Accessed April 22, 2020. <https://ccnctoronto.ca/>

⁵These issues were raised within online community meetings hosted by BC’s Office of the Human Rights Commissioner in March and April 2020.

⁶Order of the Minister of Public Safety and Solicitor General, Emergency Program Act, Ministerial Order No. M089. Province of British Columbia, 2020. http://www.bclaws.ca/civix/document/id/oic/oic_cur/m089_2020

However, while there is no provision for this to be extended to the tenant's unit, that further measure is being applied in some social housing buildings.⁷

As this is only being administered in low-income social housing, it may amount to discrimination on the basis of social condition.

Some of the associated consequences of 'no guest' policies also highlight that this measure in fact decreases the health, safety and welfare of tenants. Many 'guests' are family members with no other housing options so tenants are faced with the stress of having their family members denied access to housing and joining the growing number of unhoused people in the community. Vancouver Coastal Health has also made the connection between these policies and the recent spike in overdose deaths and is "recommending that housing providers continue allowing visitors and use other prevention strategies so people do not use alone in their rooms."⁸ Another community put at risk by these policies is sex workers because they can no longer host clients in their rooms so are forced into dangerous situation.

BC's Human Rights Commissioner urges the provincial government to consider strengthening human rights protections through the addition of social condition as a protected ground to ss.7(1), 8(1), 9, 10(1), 11, 13(1) and 14 of the B.C. Human Rights Code.

Anecdotal accounts from the community reveal additional instances of potential discrimination on the basis of social condition. These reports include denial of service such as municipal refuse workers not collecting garbage within the Downtown Eastside (DTES) of Vancouver and Canada Post letter carriers not delivering mail to the DTES, which has immediate harmful consequences for many DTES residents who receive their income or disability assistance cheques through the mail.⁹

In the online survey launched by BCOHRC to track experiences of human rights violations within the province, issues related to low income communities are a significant factor in the comments. A self-identified transit driver describes how "people from shelters or who look homeless are shunned by the public, and sometimes kicked off buses by drivers."

Changes in the economic, cultural, social and political landscape require legislators to consider the strength of the tools we have at our service. In the context of COVID-19, it is clear that B.C.'s Human Rights Code is inadequate to provide the necessary human rights protections British Columbians need.

⁷This issue was raised within: an online community meeting hosted by BCOHRC in April 2020; an online meeting of DTES community groups in April 2020.

⁸City of Vancouver. "Overdose deaths spike amidst COVID-19." Accessed April 22, 2020. <https://vancouver.ca/news-calendar/overdose-deaths-spike-amidst-covid-19.aspx>

⁹These reports occurred within: online community meetings hosted by BCOHRC in March and April 2020; an online meeting of DTES community groups in April 2020.

Background on social condition

Over the last few months, BCOHRC has been examining the addition of social condition to the B.C. Human Rights Code. This research project is grounded in a human-rights based approach and centered focus groups with those affected by discrimination on the basis of social condition, as well as including a jurisdictional scan and review and analysis of relevant literature and case law. Focus groups were also held with lawyers who represent complainants at the Human Rights Tribunal and those who represent respondents — primarily employers. In addition, consultation was undertaken with Exchange Inner City, a group that includes non-profit organizations, social enterprises, business improvement associations and community groups within the DTES. The following is an overview of this project — more information is available.

Other jurisdictions

Social condition or disadvantage is protected from discrimination in human rights legislation in Quebec, New Brunswick, Manitoba, and the Northwest Territories.¹⁰ The Quebec Charter of Human Rights and Freedoms has contained social condition as a protected ground since its inception in 1975 as has the Human Rights Act of the Northwest Territories since its foundation in 2002. New Brunswick amended its Human Rights Code to add social condition in 2005 and Manitoba added social disadvantage in 2012.¹¹

Within these jurisdictions, social condition is defined as social or economic disadvantage, but the factors outlined within those categories are slightly different and may incorporate:

- Level of income (MB, NWT)
- Source of income (NWT, NB)
- Occupation or lack of employment (MB, NB)
- Housing status (MB)
- Level of education (MB, NWT, NB)
- Literacy (NWT)

¹⁰See: Charter of Human Rights and Freedoms (Quebec); Human Rights Act (New Brunswick); The Human Rights Code (Manitoba); Human Rights Act (Northwest Territories)

¹¹Manitoba Human Rights Commission. “30 Years of the Human Rights Code 1987-2017.” Accessed April 22, 2020. https://cdn.knightlab.com/libs/timeline3/latest/embed/index.html?source=1SWzykVi2SmuFFUVy5X6iOMDeYHhfFOFKzeRKVsoy_Vc&font=Default&lang=en&initial_zoom=2&height=650

Quebec's Charter of Human Rights and Freedoms does not include a definition of social condition but evolving jurisprudence within Quebec courts has determined that it applies to many of the same elements outlined above. Importantly, a complainant does not have to meet all these factors — only one — in order to bring forward a discrimination complaint within these jurisdictions.

In 2017, the Government of Ontario was considering the addition of social condition within Private Member's Bill 164, the Human Rights Code Amendment Act.¹² After passing second reading and debate, it was referred to the Standing Committee on Regulation and Private Bills but did not move forward due to the dissolution of Ontario's 41st Parliament in May 2018 prior to the Ontario election.¹³

While many of those discriminated against on the basis of social condition also have other intersecting characteristics, such as race or disability, that are protected by the B.C. Human Rights Code, there are many people facing social or economic disadvantage who cannot avail themselves of these protections.

Within this bill, social condition included employment status, source or level of income, housing status including homelessness, level of education or any other circumstance similar and was proposed in all areas of protection currently offered in Ontario's Code.

While many of those discriminated against on the basis of social condition also have other intersecting characteristics, such as race or disability, that are protected by the B.C. Human Rights Code, there are many people facing social or economic disadvantage who cannot avail themselves of these protections. Case law reveals that trying to shoehorn social condition into other intersecting grounds adds an unnecessary additional burden on complainants. Indeed, for complainants such as panhandlers, drug users, and people who are homeless, such a burden has proven insurmountable.¹⁴

¹²Bill 164, An Act to amend the Human Rights Code with respect to immigration status, genetic characteristics, police records and social conditions. Legislative Assembly of Ontario, 2017. http://www.ontla.on.ca/bills/bills-files/41_Parliament/Session2/b164_e.pdf

¹³PIVOT Legal Society. Prohibiting Discrimination Based on Social Condition Under BC's Human Rights Code, December 2019. Vancouver, B.C.: PIVOT, 2019.

¹⁴Vancouver Area Network of Drug Users v. Downtown Vancouver Business Improvement Association, 2018 BCCA 132.



Consultation

BCOHRC worked with community groups, such as the BC Poverty Reduction Coalition, Megaphone, First United Church and the Binners' Project, to connect with people in poverty to hear their personal stories of discrimination on the basis of social condition.

Some described the pervasiveness of this form of discrimination. One participant said that it is "everywhere. It's in my co-op, it's in every restaurant around where I live, every grocery store. It's almost like there's no getting away from it." Another said "...a lot of times people will look at, like, how you dress, you know, if...you have no income or what not, usually you dress pretty shabbily, maybe in slightly dirty stuff,...and they'll just look at that and immediately judge whether they're going to give that service to you or not."

Others described the impact on their housing status. While source of income is protected in the area of tenancy in the B.C. Human Rights Code the extent of the stories represented by this example highlights the limit of that protection.

I feel like landlords are quite often abusive of their power, especially when you're coming from deep poverty and they try to take advantage of you, they'll do things like trying to raise your rent by saying, "Oh the bills increased. You just be lucky.... Where are you going to find another rental?" That's always in the back of your mind.

Many stories were also shared about denial of services or differential treatment, as well as surveillance within service locations, highlighting the need for this protection in all areas of the Code.

So about let's say 15 years of me attending this liquor store every day for 15 years they're finally like you can't come in here anymore. And I'm like, why not. They're like, "You're vending beside the store, we don't want you coming in here anymore. We don't want you coming in here anymore." The BC Liquor store, on Commercial and Grant. And I was vending, that was it. I was a customer for 15 years before that. I was making money in different ways. I was hustling in a different way. And now that I'm making a more honest living, but it's through vending, they wouldn't let me back in the store.

The Carnegie Community Action Project report (supported by Exchange Inner City), “We are too poor to afford anything,” described similar access to service issues and defined the resulting zones of exclusion as:

[S]ites marked by increased surveillance and policing. Strategies of control and punishment are implemented at these sites in order to protect them from the presence of unwanted people and from potential disruption. Only those with status, privilege and wealth can enter; all others are watched, interrogated, and criminalized.¹⁵

Differential treatment in relation to health services can be a matter of life or death.

When I was at at [a single room occupancy hotel,] there’s this wonderful woman who lives there. And she went into cardiac arrest, and we call paramedics and they put her, first of all, they left her lying in the hallway. Public hallway of the hotel for everyone to see. And then the only one to do CPR for five minutes. And I’m just like, wait a minute. I just watched the documentary, you know, you can’t just declare someone dead after five minutes. Five minutes. Yeah, and I mean, ...I know it varies from state to state and maybe even province to province, how long before they can quit legally, and let you just go but I said, No, you’re going to give her 20 minutes. And the female paramedic got just furious. She said, we’re not going to bother with this. And I was like, excuse me, you’re not gonna bother with it. This is a person lying here. It was shocking.

¹⁵Carnegie Community Action Project. “We are too poor to afford anything”: Retail Gentrification Mapping Report. Vancouver, B.C.: CCAP, 2017.

Finally, this systemic discrimination applies to employment too.

So, I'm sitting at this table speaking of equity when the joke's on me because as soon as my voice is spoken, they disregard it because of the shape of my teeth. And that is classism, because the way it really trickles down is, do you have teeth or not? You know, so I'm walking into all these interviews, not accepted because I don't have teeth, not because I'm not actually good at the organizing piece or not because I know the actual education either, just simply because I don't look the way they want me to. When I walk in there, they want me to look like they do.

Complainant-side counsel

In relation to other consultations undertaken, complainant-side lawyers expressed broad support for the addition of social condition as a protected ground in the Code.

Respondent-side counsel

There were three main concerns that emerged during the focus group with respondent-side lawyers. The first was not related to social condition itself but the increased burden on an already over-stretched Tribunal system through the addition of another ground. However, the review of other jurisdictions with this protection does not reveal a large number of cases associated with social condition.¹⁶ That said, given their general concern with the existing overburdened system, also echoed by complainant-side counsel, it is clear that the Tribunal requires additional funding to mitigate delays. Although BCOHRC does not anticipate that the addition of the ground of social condition will slow the individual complaint system down, additional resources for the Tribunal would increase access to justice for all participants.

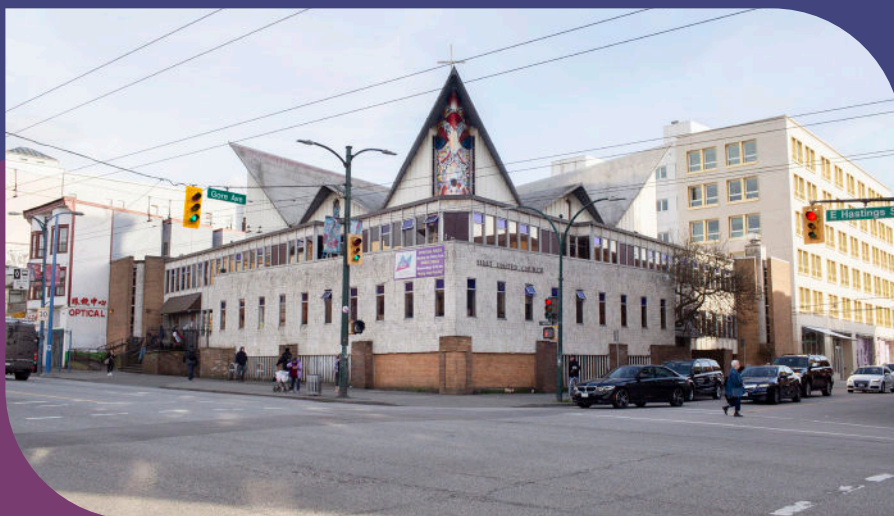
Respondent-side counsel also flagged that the issue of discrimination on the basis of social condition does not arise in their work. Allegations of this nature are screened out by the Tribunal before they reach respondents and most allegations likely do not result in complaints in the first place because of the extent of marginalization people in poverty face. However, it is evident that systemic discrimination on the basis of social condition is a significant issue for marginalized low-income people, as described above and below in the multiple consultations and reports issued over the years, detailing the issue within all areas of the Code including employment.

¹⁶5% (16 cases) reported in New Brunswick Human Rights Commission Annual Report 2017-2018; 0.3% (1 case) reported in Manitoba Human Rights Commission Annual Report 2017; 3.8% (2 cases) reported in Northwest Territories Human Rights Commission Annual report 2018-2019; 16 cases in Quebec in 2018-2019, private communication with staff from Commission des droits de la personne et des droits de la jeunesse.

The final concern voiced by some within the respondent-side group was the consideration of whether social condition is an analogous ground to those already protected within the Code. This issue has been considered in full in many of the earlier comprehensive reports referenced below.¹⁷ The primary concern of the group was the issue of immutability so that will be briefly considered here.

While it is not clear that legislators must only include immutable grounds in human rights legislation (for example, political belief is not immutable), the review from 2000 by the panel led by Justice La Forest (outlined in more detail below) states that:

Research done for the Panel shows that poverty is immutable in the sense that it is beyond the control of most poor, at least over considerable periods of their lives. There is evidence that poverty is inherited because individuals whose parents were poor are more likely to live in poverty. Similarly, there is a correlation between one's educational level and that of his or her parents. Our research also shows that while people may move from social assistance to a low-paying job to employment insurance, few actually move into income levels high enough to escape their condition of poverty.¹⁸



¹⁷See: Justice Canada, Minister of Justice and Attorney General of Canada. Canadian Human Rights Act Review Panel chaired by Justice La Forest. Promoting Equality: A New Vision. Ottawa, Ontario: Justice Canada. 2000; Wayne MacKay and Natasha Kim. Adding Social Condition to the Canadian Human Rights Act. Ottawa, Ontario: Canadian Human Rights Commission, 2009.

¹⁸Justice Canada, Minister of Justice and Attorney General of Canada. Canadian Human Rights Act Review Panel chaired by Justice La Forest. Promoting Equality: A New Vision. Ottawa, Ontario: Justice Canada. 2000.

Building on Support

Provincial consultation on social condition

Over the last few decades, there have been many recommendations for the inclusion of social condition in human rights legislation. Most recently, Attorney General David Eby tasked Ravi Kahlon, then Parliamentary Secretary for Sport and Multiculturalism, with leading a public engagement process on the re-establishment of the B.C. Human Rights Commission in Fall 2017. This provincial consultation documented many recommendations for social condition. The issue was then identified as a priority within the final report and included as a specific recommendation to the Attorney General:

The subject of social condition where factors such as income or education levels create discrimination came up far too many times throughout this engagement for it not to be addressed in my report. The Code addresses discrimination on specific grounds but does not address the underlying causes of homelessness, unemployment, low income and so on. In our public engagement, I learned that multiple social conditions often lead to instances of discrimination. Thus, the Code has a limitation in not making poverty or social condition a protected ground.¹⁹

While many more organizational and individual written submissions and meetings discussed the issue of poverty and related factors, 17 of these also explicitly recommended the addition of social condition to the Code despite amendments to the Code not being the focus of the consultation process. These included national and provincial non-profit organizations, community groups, unions, legal clinics, and previous Commissioners and staff from B.C. and the Northwest Territories.

In its submission, BC Public Interest Advocacy Centre raised the issue of intersectionality as well as highlighting the need for targeted protection:

Discrimination on the grounds of social condition often disproportionately impacts women, racialized people, people with disabilities, Indigenous people and others covered by existing ground protections. However, proving that the discrimination is connected to these additional grounds creates additional evidentiary burdens for complainants, creating an unfair and arbitrary obstacle to accessing justice for those who are already marginalized.²⁰

¹⁹Province of British Columbia. A human rights commission for the 21st century: British Columbians talk about Human Rights: A report and recommendations to the Attorney General of British Columbia. Victoria, B.C.: 2017.

²⁰Consultation materials provided to BCOHRC by staff from the Ministry of Attorney General.

The Hospital Employees' Union emphasised the need for social condition protection in relation to its low-income workers:

Many of our members have been driven into the ranks of the “working poor.” They have been forced to take on multiple jobs, and to seek various forms of social assistance to make ends meet. As a result of their “social condition” they experience discrimination in accommodation, services, facilities, associations and purchase of property, as well as in employment. The current Human Rights Code does not adequately protect them.²¹

In relation to the online comments collected through this consultation process, approximately 10% of the total 339 comments referred to the issue of poverty.²² These ranged in topic, from discrimination against homeless people to the impacts of this discrimination on youth.

People in Maple Ridge and Grand Forks and probably other places are also being vile about the presence of homeless people in their communities and basically trying to drive them out even though they have no place to go. We need “social condition” to be added to the Human Rights Code so we would have a means of tackling this hate against homeless people.

A lot of youth from experience and witnessing are bullied from a economic viewing such as wealth, social status. It's hard to fit in school when you come from a low-income family setting. Youth and adults have been discriminated for centuries on a economic/wealth status. I believe it's the oldest discrimination in a class system world as well as the most overlooked which needs to be changed. People have human rights no matter how rich or poor.

²¹Ibid.

²²Ibid.

Other Reports

There have been many other consultations and reports over the years considering the addition of social condition to human rights legislation.

One of the most pivotal was the review of the Canadian Human Rights Act led by former member of the Supreme Court of Canada Justice La Forest in 2000. Social condition was included in this review in part because, in June 1998, the Senate passed Bill S-11 to add the ground of social condition to the Act but this Bill was defeated in the House of Commons in spring 1999. Arising from this, the Minister of Justice at the time stated that she wished to include this issue within the comprehensive review. On the basis of receiving “ample evidence of widespread discrimination based on characteristics related to social conditions, such as poverty, low education, homelessness and illiteracy,” La Forest and the panel concluded: “We believe there is a need to protect people who are poor from discrimination.”²³

They also challenged the argument that a specific protection for social condition is not necessary due to the intersection of poverty with other protected grounds such as race or disability.

Some barriers related to poverty could be challenged on one or more of the existing grounds. However, these cases have rarely been successful. They are difficult to prove because they do not challenge the discrimination directly. Such a case may require complex expert testimony about the economic status of the group affected, since it may be necessary to show a disproportionate effect on a particular group. Evidence can be even more difficult to obtain if the case involves the interaction of multiple grounds. Perhaps more fundamentally, if a policy or practice adversely affects all poor people or all people with a low level of education, a ground-by-ground consideration of the issue can be seen as a piecemeal solution that fails to take into account the cumulative effect of the problem.²⁴

The review details the types of discrimination experienced by people in poverty including issues in accessing employment and services, as well as stereotypes in the media and political discourse, and then goes on to analyse the potential issues associated with the addition of social condition. After comprehensive consideration, the panel explicitly recommends that social condition be added to the prohibited grounds of discrimination listed in the Act.

²³Justice Canada, Minister of Justice and Attorney General of Canada. Canadian Human Rights Act Review Panel chaired by Justice La Forest. Promoting Equality: A New Vision. Ottawa, Ontario: Justice Canada. 2000.

²⁴Ibid.

Building on this report, a review authored by Wayne Mackay and Natasha Kim and commissioned by the Canadian Human Rights Commission in 2009, again considered adding social condition to the Canadian Human Rights Act and again recommended the addition of social condition as prohibited ground of discrimination. It is worth quoting their reasons in full:



First, it would advance the purpose and principles of the [Canadian Human Rights Act] by extending discrimination protection to one of the most marginalized and vulnerable groups in society.



Second, the addition of social condition to the [Canadian Human Rights Act] would build upon the existing infrastructure of the statutory human rights regime and the expertise of the Canadian Human Rights Commission and Tribunal, enabling the resolution of complaints in a more economical way and in a manner that permits a more authentic reflection of the experience of discrimination where multiple grounds are involved.



Third, the inclusion of social condition could inform jurisprudential developments in the Charter field, both in the application of equality rights under section 15 of the Charter and in the consideration of broader socio-economic claims, due to the symbiotic relationship between the Charter and human rights codes.



Fourth, the addition of social condition would be of practical benefit to those suffering from socio-economic disadvantage, not only because they would have a legal recourse for discrimination where there previously was none, but also because the statutory human rights regime would provide a more accessible venue for those who, by definition, lack resources to fund an expensive court challenge.



In addition, the educational and symbolic value of adding social condition to the [Canadian Human Rights Act] will send an important message to the public that they are equally deserving of dignity and protection from discrimination.



Lastly, the addition would respond to Canada's international commitments and the recommendations of human rights agencies and other commentators.²⁵

At the provincial level, this recommendation has been made in 1998 by the previous B.C. Human Rights Commission in the report *Human Rights for the Next Millennium* and in 2018 by B.C. Human Rights Tribunal in a letter to the Attorney General.



²⁵Wayne MacKay and Natasha Kim. Adding Social Condition to the Canadian Human Rights Act. Ottawa, Ontario: Canadian Human Rights Commission, 2009.



Conclusion and recommendation

This brief provides an overview of increased instances of discrimination on the basis of social condition within the current context of COVID-19, as well as previous reports and consultations that have documented the extent of this systemic discrimination. It also centres the voices of low-income people who face this form of discrimination in their every day lives with no access to justice because of the omission of social condition from the list of protected grounds within the B.C. Human Rights Code. According to Mackay and Kim in their argument for this addition in the Canadian Human Rights Act (CHRA), this omission violates the very purpose of substantive equality, as protected under the Charter of Rights and Freedoms.²⁶

B.C.'s Human Rights Commissioner urges the provincial government to consider strengthening human rights protections through the addition of social condition as a protected ground to ss.7(1), 8(1), 9, 10(1), 11, 13(1) and 14 of the B.C. Human Rights Code.

Social condition should be defined as:

Social condition means social or economic disadvantage on the basis of level or source of income, occupation or lack of employment, housing status including homelessness, level of education or literacy or any other similar circumstance.


Human rights protections for people living in poverty have long been called for. In this time of social and economic crisis, this protection is needed now more than ever.



²⁶Ibid.



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