



CANADIAN HUMAN RIGHTS COMMISSION

NATIONAL
ABORIGINAL
INITIATIVE

Sherri Helgason

Canada



*Aboriginal Financial Officer
Association of Canada*

*Nation Building – Keys to
Success for the Next Decade*

Vancouver BC, February 16, 2011

***Introduction to
Section 67 of the
Canadian
Human Rights
Act***

Naiomi Metallic

BURCHELLS LLP



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Part 2: Work of the Canadian Human Rights Commission, and an Introduction to the Human Rights Guide for First Nations Managers

Part 4: Legal Challenges and Impact of Current Cases

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Part 1: Introduction to Section 67 of the Canadian Human Rights Act

Part 3: Discrimination Hot Spots and Tips for Dealing with Them



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Introduction to Section 67 of the Canadian Human Rights Act

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What is the Canadian Human Rights Act (CHRA)?

- Federal law passed in 1977
- Provides human rights protection by allowing people to file **discrimination complaints** based on **prohibited grounds**
- Applies to laws and action of the federal government, and any entity under its jurisdiction, which includes **First Nation Governments (FNGs)**
- Complaints are investigated by the **Commission**, and if found to have merit, will be sent to the **Tribunal**.



What is Section 67 of the CHRA?

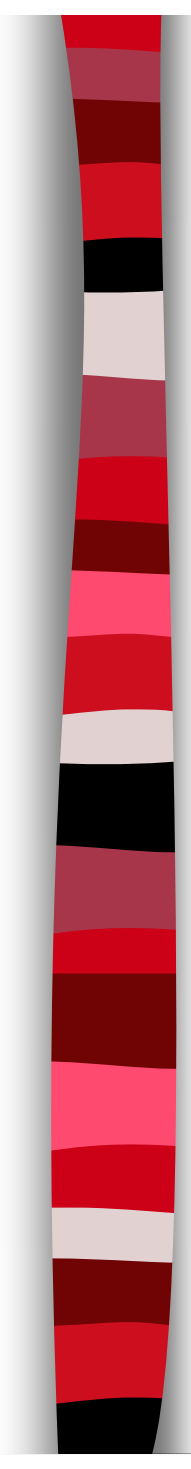
- Although the CHRA was meant to protect human rights in Canada, it was subject to one exception for over 30 years, contained in Section 67:

“Nothing in this Act affects any provision of the Indian Act or any provision made under or pursuant to that Act.”



Why was Section 67 passed?

- Federal government's position is that in 1970s, it had committed to make reform the *Indian Act* and to do so in consultation with Aboriginal groups.
- Section 67 was intended to facilitate this.
- Supposed to **temporary**.
- But Section 67 in place for over **30 years!**



Placing Section 67 within the framework of colonialism

- 1) Section 67 was primarily intended to shield INAC and the *Indian Act* from discrimination complaints **by** First Nations people – the protection **for** FNGs was secondary;
- 2) The potential discrimination FNGs are protected from by Section 67 was largely made possible, and encouraged, *by* INAC.



The *Indian Act* was used to discriminate against First Nations in many ways:

1. Abolish traditional forms of Aboriginal governance - 1869 onwards
2. Criminalize spiritual practices and ceremonies - 1880 – 1951
3. Criminalize the practice of traditional subsistence activities by First Nations
4. Residential and Indian Day School - 1868-1980s
5. Restrict Aboriginal peoples' access to the courts to bring claims - 1926-1951



More examples of discrimination under the *Indian Act*:

6. **Control who could be an “Indian” - 1868 to today**
 - a. **Voluntary Enfranchisement (1869 – 1985)** - A means for Indians “of good character” (as determined by a board of non-Aboriginal examiners) to be declared “non-Indian”
 - b. **Compulsory Enfranchisement (1876 – 1951)** - Automatic loss of Indian status if became doctor, lawyer, a priest / nun, got any type of University degree, or traveled outside Canada for over 5 years without permission of Minister.
 - c. **Status passing through male-line only (1869-1985)** - Indian women who married non-Indian lost status and so did their children
 - d. **Illegitimate children (1876 - 1985)** - could lose status “if the Registrar is satisfied that the father of the child was not an Indian...”
 - e. **Double Mother Rule (1951 - 1985)** – person would lose status if mother and maternal grandmother had no Indian ancestry.
 - f. **Bill C-31 (1985 to present)** – removed some forms of discrimination, but introduced new ones.



How Section 67 played out

- Tribunals and courts adopted a narrow interpretation of section 67
- Never entirely barred First Nations people from bringing complaints
- It only shielded actions or decisions of INAC or FNGs that could be directly linked to the *Indian Act* or regulations made under it.
- INAC received more protection than FNGs



FIRST NATION GOVERNMENTS

SHIELDED	NOT SHIELDED
<ul style="list-style-type: none">• Land allocations under s. 20 of the <i>Indian Act</i>.• Election codes approved under <i>Indian Act</i>• Membership codes approved under <i>Indian Act</i>• Decisions based on section 81 by-laws.	<ul style="list-style-type: none">• Employment / staffing decisions<ul style="list-style-type: none">◦ Band administrators◦ Health workers◦ Teachers• Spending decisions• Membership rules, codes and moratoriums not approved under <i>Indian Act</i>• Administration of social assistance on reserve• Administration of education on reserve

CANADA / INAC

SHIELDED	NOT SHIELDED
<ul style="list-style-type: none">• Primary and secondary education decisions under s. 114-118 of <i>Indian Act</i>.• Registration provisions under s. 6 of <i>Indian Act</i>• Election provisions under s. 74-80 of <i>Indian Act</i>• Land allocations under s. 20 of the <i>Indian Act</i>.• Wills and estates under <i>Indian Act</i> and Regulations• Mental incompetency / guardianship decisions under <i>Indian Act</i>	<ul style="list-style-type: none">• Post-secondary funding decisions• Child welfare spending• Social assistance spending• Health spending



Why was Section 67 repealed?

- Created confusion, inconsistency and lack of full protection for First Nations human rights
- Took several attempts, but pressure from First Nation organizations, the Commission and international human rights observers caused federal government to change it.
- Repealed **June 18, 2008.**



Important safeguards included in repeal law

1. A three-year transition period to allow First Nations to prepare for the impacts of the repeal (June 18, 2008 to June 18, 2011);
2. Rules about how discrimination complaints against First Nations should not impact Aboriginal and Treaty rights;
3. Rules about how discrimination complaints should take into account First Nations' collective rights, traditions and customs; and
4. Requirements for the government to study resource and capacity needs of First Nations in dealing with the change.



Repeal of Section 67 creates positive opportunities

- Opens up FNGs to some risk (but FNGs were already vulnerable on several other grounds)
- Opportunity to get out of “trap” INAC set & possible means to hold INAC more accountable
- Opportunity to review and update by-laws or codes in light of changing needs and perspective of community
- Opportunity to rediscover our own traditions, customs and laws for protecting human rights and incorporate into human rights process
- Opportunity to develop our own human rights resolution process that meet the needs of the community



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**Work of the
Canadian Human Rights Commission
&
Introduction to the (soon to be released)
Human Rights Guide for First Nations Managers**

Vancouver, BC February 16, 2011

PREFACE

The Canadian Human Rights Commission:

- Recognizes the inherent Aboriginal right to self-government
- Recognizes the importance of Indigenous legal traditions and customary laws
- Recognizes existing Aboriginal and Treaty rights
- Recognizes the right of Indigenous people to be free of discrimination
- Recognizes equal human rights for women and men

CHRC MANDATE

- Expanding knowledge
- Preventing discrimination
- Resolving disputes

JURISDICTION/MANDATE

- CHRC mandated under the CHRA to deal with complaints of discrimination based on 11 prohibited grounds.
- Additional powers and duties under section 27
- Federal government departments and agencies
- Federal Crown corporations
- Federally regulated enterprises: inter-provincial transportation companies of passengers, goods or services; chartered banks; telecommunications companies; certain mining operations; prairie grain elevators; First Nations.

Repeal of Section 67

s. 67 « Nothing in this Act affects any provision of the Indian Act or any provision made under or pursuant to that Act. »

- Shielded decisions made pursuant to the Indian Act, by the federal government and some First Nations, from human rights scrutiny.
- Repealed in June 2008 by Bill C-21, with adoption of several amendments, including a three year transition period, a non-derogation clause, an interpretive clause, and government commitment to a study.

Immediate Impacts of Repeal

- Complaints against the Government of Canada on provisions of the Indian Act (Primarily Status complaints - Bill C-31 reinstates and their descendants)
- Various policies and funding complaints regarding services on reserve eg – child services, policing, housing.
- Education – INAC policies & band funding (transition period exempted for some complaints against First Nations)
- Social services on reserve (some exempted)
- Continue to accept complaints we could have pre-repeal but awareness of CHRC process is increasing (e.g. Band council employment matters)

Possible Impacts on First Nations

- Familiarizing organizations and communities with new requirements
- Preventing discrimination and respecting human rights (e. Policy reviews, infrastructure needs, etc.)
- Learning about defences under CHRA
- Resolving disputes internally – community-based dispute resolution processes
- Responding to complaints of discrimination

CHRC Activities to date

- Research and policy work (e.g. individual and collective rights)
- Development of tools (Clear language guide, First Nations managers guide)
- Exploring internal redress processes
- Setting up a list of ADR practitioners with experience in Aboriginal communities
- Handling initial complaints against the Government

Familiarizing people and organizations with new requirements

- The CHRC has just released *Your Guide to Understanding the Canadian Human Rights Act*
 - Meant as an easy-to-understand booklet to help people in Aboriginal communities understand the human rights concepts and procedures
- The CHRC is finalizing *A Human Rights Guide for First Nations Managers*
 - Meant more for people in roles such as yours, who may be in a position to respond to informal or formal human rights complaints

Human Rights Guide for First Nations' Managers (Soon to be Released)

- About the Guide, the Commission and the Tribunal
- About human rights law and discrimination
- How to prevent discrimination and respect human rights
- How to resolve disputes internally: community based resolution processes
- How to respond to a CHRC complaint of discrimination



Discrimination Hot Spots & Tips for Dealing with Them

Naiomi Metallic

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Areas of FNG activities where human rights complaints can arise

1. Employment
2. Provision of services
3. Housing / land management
4. Band-owned infrastructure
5. Membership and residency rules
6. Elections and voting
7. Other by-laws



EMPLOYMENT

- Interviewing
- Hiring
- Promotion
- Termination
- Sick leave & compassionate leave
- Maternity leave
- Workplace interactions & relationships
- Addictions
- Physical and mental health issues
- Workplace policies



Hot spot → Workplace interactions & relationships

- **Sexual jokes / banter in the workplace may constitute sexual harassment**
- **Harassment based on other grounds, such as sexual orientation, ethnic origin, etc.**

Under the CHRA, acts of employees of an organization are viewed as acts of the organization, unless the organization shows it did everything it could to stop the employee from doing what they did.

TIPS →

- *Consider developing an anti-harassment policy for FNG staff.*
- *Commission has a guide that can be adapted on their website – **Anti-Harassment Policies for the Workplace: An Employer's Guide.***
- *A sexual harassment policy is mandatory for all employers, including FNGs, under Canada Labour Code.*



*Hot spots → Interviewing

- **Asking someone in an interview whether they are married, intend to have kids, their sexual orientation, their history of physical or mental illness, and whether they have a criminal record.**

TIPS →

- *Unless there is a specific job-related reason for asking, can raise a potential human rights issue*
- *A person could complain they were denied a job on account of personal characteristics not related to job-requirements*
- *Commission has a **Guide to Screening in Employment** on its website*

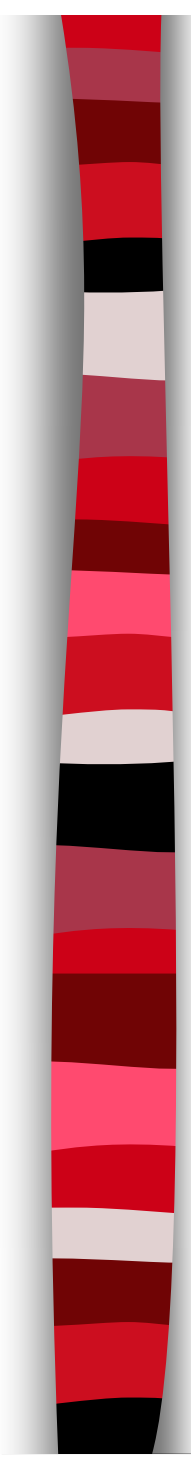


*Clarification point →

- A specific job-related reason is called a ***bona fide occupational requirements (BFOR)***
- ***EXAMPLE → A FNG not hiring a blind school bus driver for safety reasons would be a BFOR***

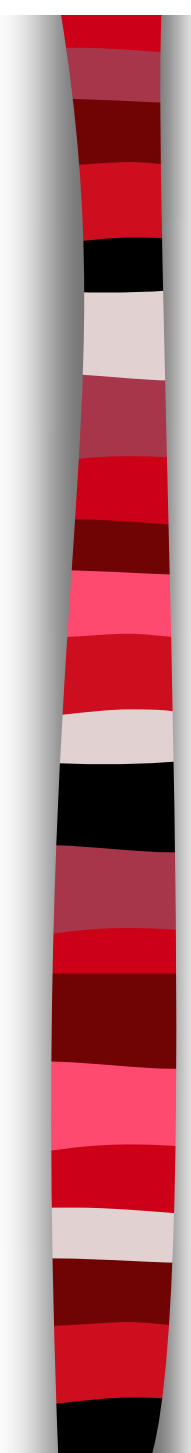
TIPS→

- Discrimination can be justified under the CHRA when:
 1. It is based on a valid objective;
 2. It makes sense in terms of the valid objective identified;
 3. The objective was adopted in good faith; and
 4. It is reasonably necessary: trying to achieve the objective in any other way would cause undue hardship to the FNG.
(Undue hardship can include unreasonable health or safety risks, or costs, or other considerations.)



Case example → *Dennis v. Eskasoni Band Council (2008)

- The Band Council adopted a drug policy requiring all of its commercial fishermen to submit to regular drug tests.
- One employee alleged this was discrimination, since he smoked marijuana for medical purposes.
- The Tribunal found that the drug policy was justified.
- It was based on safety reasons and health concerns and was necessary since fishing is dangerous and drug use impairs the senses and creates safety concerns.
- Also, the discrimination was minimized by the fact that if the fishermen tested positively, they had the option of undergoing drug counseling and would get other opportunities in the future to take the test again.



Hot spot → Physical and mental health issues

- **Firing someone after receiving complaints that they have been acting strange and saying strange things.**
- **Denying the request of an employee who has back problem for an ergonomic chair.**
- **Suspending an employee who has come to work intoxicated on several occasions**

TIPS →

- *Part of meeting the justification test involves showing the individual could not be accommodated to the point of undue hardship*
- *This is known as the **duty to accommodate***
- *In many cases involving physical and mental disability, the duty to accommodate will require the FNG to adapt workplace policies, practice or design features to meet a persons needs.*



The Commission has many resources on the duty to accommodate on its website →

1. *Fact Sheet on the Duty to Accommodate*
2. *Duty to Accommodate: Frequently Asked Questions*
3. *A Place for All: A Guide to Creating an Inclusive Workplace*
4. *Policy and Procedures on the Accommodation of Mental Illness*
5. *Guide for Managing the Return to Work*



*Hot spot → First Nation member only hiring policy

- An Ojibway FNG refuses to hire a woman married to a band member as Director of Education because she is Cree rather than Ojibway

TIPS →

- Raises issues of discrimination on the basis of ethnic/Aboriginal origin
- The Commission has an **Aboriginal Employment Preference Policy**, which authorizes preference policies for Aboriginal employees, but not preference within Aboriginal groups (i.e., Cree vs. Ojibway)
- In some cases can be justified as a BFOR, for example, if it is a Cree-immersion school and need to ensure teachers speak Cree.



PROVISION OF SERVICES

- Health services
- Social assistance
- Education
- Natural resource management
- Economic development services
- Many others



*Hot spots → Eligibility criteria

- **Social assistance criteria that denies assistance to non-member residents**
- **On-reserve school policy that denies admittance to the children of members living off-reserve**

TIPS →

- *Can raise issues of discrimination based on race/ethnicity and marital status for non-member spouses*
- *Off-reserve status is not a prohibited ground itself, but can be tied to other grounds like sex and family status (Bill C-31 Indians)*
- *Discrimination can be justified in some cases, but have to prove undue hardship.*



***Question→ What about when the criteria is set by INAC?**

- Since the criteria is set by INAC, your FNG cannot change the criteria by itself.
- However, there are steps you can take to try to have this discrimination dealt with by INAC:
 1. Make notes of your concerns and keep it in your file, particularly if you receive complaints.
 2. Raise your concerns and any complaints you receive directly with the Sector of INAC in charge of overseeing administration of the program or service, preferably in writing.



HOUSING / LAND MANAGEMENT

- Band-owned housing
- Allocation of Band Council Resolution (“BCR”) for Certificate of Possession (“CPs”)
- Housing policy
- Residency by-laws



*Hot spot → Issuing BCR for CPs

- **Refusing to issue a BCR for a CP to the children of a band member because they are non-band members**

TIPS →

- *Could constitute discrimination on the basis of race/ethnic origin and family status.*
- *In this case, the FNG would be following Indian Act rules and therefore complaint should really be focused at Canada / INAC.*



*Case example → *Louis and Beattie v. INAC (2010)*

- Louis was a member of Okanagan band with a CP for land on the reserve
- Wanted to get a locatee lease under s. 58(3) of *Indian Act* to lease to Beattie (a non-Indian) for a joint economic development venture
- INAC would not approve the lease because it didn't conform to types of leases recognized by INAC's *Land Management Manual*
- Louis complained that the denial was paternalistic and that INAC shouldn't interfere with his right to decide what to do with his CP lands
- Tribunal agreed. Process under s. 58(3) had to recognize and accept that status Indians as "personally responsible Canadians capable of making their own decision about benefits from leasing their lands." INAC could not decide unilaterally.



**Louis and Beattie v. INAC*

- Tribunal noted:

“Passage of Bill C-21, An Act to amend the *Canadian Human Rights Act* marks a significant turning point in the relationship between First Nations and the Government of Canada”, said Minister Strahl. **“It underscores this government’s strong commitment to protecting the human rights of all Canadians.”** The announcement, however, had no apparent effect on INAC’s position regarding the complainant’s applications. **Nothing changed, and the complaint before me is the result.”**



*Hot spot → Band housing

- Refusing band housing to Bill C-31 members
- Denial of residence to Band members married to non-Aboriginal people

TIPS →

- Could constitute discrimination on a combination of the grounds of sex and marital status
- Could be justified, but must prove undue hardship
- First Nation's customs and traditions now have to be considered under Interpretive Clause, to the extent that they are consistent with the principle of gender equality.



BAND-OWNED INFRASTRUCTURE

- Band office buildings
- Band housing
- Other building owned by the band (i.e., health centre, police station, fire station, schools, etc.)



*Hot spot → Accessibility issues

- **Buildings not wheelchair accessible (lack of ramps, elevator, widened doors, accessible bathroom, etc.), or not accessible persons with other disabilities**

There is a strong argument for INAC to be involved in the resolution of such issues. First, INAC's participation may be necessary for financial reasons. Second, INAC's failure to increase funding to Capital Facilities and Maintenance Program may be part of the problem.

TIPS →

- *Could be discrimination on the basis of disability, and raises duty to accommodate to the point of undue hardship.*
- *First Nations are currently facing a housing-crisis in their communities and lack the funds to update and modernize old, and sometimes run-down, buildings. Many First Nations primarily rely on funds from the Government of Canada for capital building and repair costs.*



Laws / policies on membership and residence in community

- Membership codes (s. 10)
- Residency by-laws (s. 81(1)(p.1))
- By-law on rights of members' spouses and children on reserve (s. 81(1)(p.2))
- By-law on trespass on reserve (s. 81(1)(p))



*Hot spot → Membership codes

- **Denial of membership or residency to Bill C-31 members or their children, or because not 50% Indian blood**

There is a strong argument that INAC should be involved in the resolution of such issues, since they encouraged and approved these type of membership codes.

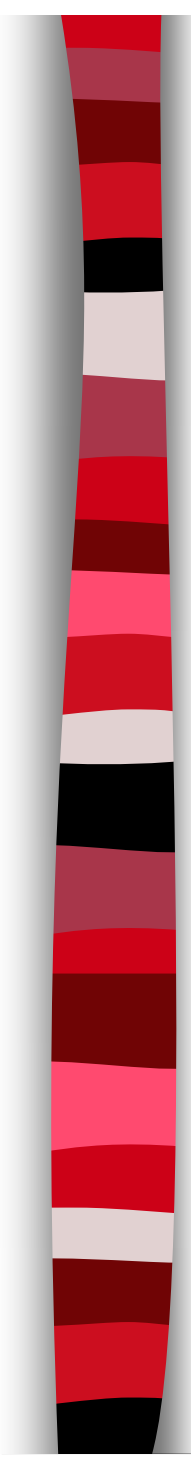
TIPS →

- *Discrimination in membership codes can be justified if it is reasonable necessary to achieve a valid objective and that objective is carried out least discriminatory way possible.*
- *Valid objectives could include preservation of culture, language, land and financial considerations, however, there is a high burden of proof to show the discrimination is necessary to achieve the object.*
- *First Nation's customs and traditions now have to be considered under Interpretive Clause, to the extent that they are consistent with the principle of gender equality.*



***Case example → Jacobs v. Mohawk Council of Kahnawake (1998)**

- The Council adopted membership rules requiring 50% blood quantum and disqualifying anyone who married someone not having 50% blood quantum.
- Peter Jacobs (of Black and Jewish descent) was legally adopted by Mohawks, raised in the community, and spoke the language.
- Council revoked his membership and that of his wife (a Mohawk from Kahnawake).
- This meant they were denied residence of Kahnawake, welfare, education, medical and other privileges on-reserve.



***Jacobs v. Mohawk Council of Kahnawake (1998) (cont'd)**

- Tribunal found that objectives raised by Council were valid – culture, traditions and language erosion – and adopted in good faith
- However, excluding Jacobs family was not reasonably necessary to ensure survival of Mohawk culture
- The Jacobs presented no threat to the survival of the Mohawk language or cultural survival
- “Peter and Trudy were raised as Mohawks. They adhere to Mohawk traditions and values. Their children are being raised as Mohawks. They attend a Mohawk immersion school. ...”
- Tribunal also noted that the Mohawks had a traditional practice of accepting non-Mohawks persons into their culture with full rights, except to vote.



Elections and voting

- *Indian Act & Regs.*
- Custom Election / Leadership Selection Code



Hot spot → Eligibility criteria

- **Ban on voting by off-reserve members**
- **Ban on voting by s. 6(2) Indians**

If the ban is in the *Indian Act*, the focus of the complaint is INAC. If the ban is in an Election Code, the focus is on the FNG, however, INAC may bear some responsibility since it approves Election Codes.

TIPS →

- *Both may constitute discrimination on the basis of gender and family or marital status*
- *Could be justified, but Corbière decision suggests absolute ban is not minimally impairing, but there can be some distinctions*



Hot spot → Eligibility criteria

- **Eligibility criteria for leadership requiring person to be over 45**

TIPS →

- *May constitute discrimination on the basis of age*
- *But possibly could be justified as part of a First Nation's legal tradition or customary law.*



Hot spot → Eligibility criteria

- **Eligibility criteria for leadership requiring person to have no criminal record**

TIPS →

- *Could constitute discrimination on the basis of having a criminal conviction for which you were pardoned.*
- *If persons with pardons allowed to run, this rule would likely not conflict with CHRA.*
- *Possible to justify such a rule as well.*



Other by-laws

- Law and order by-laws (s. 81(c))
- Intoxication by-law (s. 85.1)



Hot spot → Intoxication by-law (s. 85.1)

- **An intoxication by-law that banishes or otherwise denies FNG programs or services to residents for using alcohol or drugs**

TIPS →

- *May constitute discrimination on the basis of disability. Alcohol and drug dependencies are considered disabilities for the purpose of the CHRA.*
- *There may be a duty to accommodate persons with alcohol and drug dependencies up to the point of undue hardship.*
- *This should not prevent a FNG from having an intoxication by-law, but measures to accommodate persons with additions may have to be built into the by-law.*



*Hot spot → Retaliation

- A man made a complaint against his Band Council for being denied a job on the basis of family status.
- He later became a member of the Band Council and the rest of the Council would often leave him out of decisions at meetings.
- On this basis, he added a complaint of retaliation to his human rights complaint.
- He lost on his original complaint but won on the ground of retaliation.

TIPS →

- *Retaliation occurs where someone threatens, intimidates or otherwise treats another person differently because that person filed a human rights complaint.*
- *The CHRA can fine up to \$50,000 for retaliation.*



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Legal Challenges and Impact of Current Cases

Vancouver, BC February 16, 2011

Challenges for the CHRC

- Legal requirement to give ‘due regard’, balance individual and collective rights
- New application of the law – not much guidance.
- Legal challenges
- Complex funding and service delivery regimes
- Unique historical and contemporary dynamics that are relevant to complaints and analysis
- Likely more complaints and referrals to tribunal

1.2 The Interpretive Provision

In relation to a complaint made under the *Canadian Human Rights Act* **against a First Nation government, including a band council, tribal council or governing authority operating or administering programs and services under the Indian Act, this Act shall be interpreted and applied in a manner that gives due regard to First Nations legal traditions and customary laws, particularly the balancing of individual rights and interests against collective rights and interests, to the extent that they are consistent with the principle of gender equality.**

Cases Currently before Tribunal

- Several cases currently before tribunal
 - First Nations child welfare case
 - Fallan Davis v. Canada Border Services Agency
 - Matson v. INAC
- Issues raised include:
 - Definition of Service
 - Comparator Group

First Nations Child Welfare

- One of the largest cases before the Tribunal
 - In number of individuals affected (over 9000 estimated First Nation children in care)
 - In financial impact
 - In legal impact (both “service” and “comparator group” issues)
- What is it about?
 - Allegation is that INAC discriminates against Aboriginal Children in the provision of a service by inadequately funding child welfare services on reserve, contrary to section 5 of the CHRA

Fallan Davis v. CBSA

- What is it about?
 - Allegation is of racial profiling at the Canadian border by CBSA officer
 - Is the work performed by CBSA at the border a “service” under the CHRA?
 - Case is ongoing

Matson v. INAC

- What is the case about?
 - Allegation is that the legislative scheme enacted by Parliament to determine eligibility for registration as an “Indian” under the Indian Act discriminates based on sex and family status
 - Similar to *McIvor*
 - Adjourned pending legislative changes to the Indian Act (Bill C-3)
 - Not all cases will be resolved by change to the law

Conclusion

- Federal government has been, to date, the most frequent respondent to post-67 complaints
- The end of the transition period in June 2011 will have an impact for First Nations governments
- Our understanding of the Interpretive Provision, and how it affects human rights law, will grow and evolve over time.
- There is much to learn by looking to traditional and existing systems of conflict resolution within First Nations communities.
- In the meantime, building awareness and capacity to prevent and resolve discrimination is in everyone's interests, and is a necessary step in advancing the rights of First Nations people.

Thank you, merci, meegwetch!

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