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ATTN: BC Poverty Reduction  
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Via Email: [BCPovertyReduction@gov.bc.ca](mailto:BCPovertyReduction@gov.bc.ca)

**RE: British Columbia Poverty Reduction Strategy**

Please accept the following as our submission for your consideration in drafting the BC Poverty Reduction Strategy.

Together Against Poverty Society (TAPS) provides legal advocacy services to people living in poverty within the Greater Victoria region. As front-line service providers, we consistently witness the profound impact of poverty on an individual's psychological health, physical welfare, and sense of dignity. We commend your commitment to addressing the unacceptable rate of poverty in BC. This poverty reduction strategy is long overdue, and we stress the need for meaningful action on a priority basis.

The BC Poverty Reduction Coalition, of which TAPS is a member, has produced a thorough submission highlighting many salient considerations. We wholeheartedly support this submission and intend for this letter to supplement the valuable proposal advanced by the BCPRC.

TAPS specializes in helping people access government services to which they are entitled. Specifically, we advocate for individuals with respect to the *Residential Tenancy Act*, the *Employment and Assistance Act*, and the *Employment Standards Act*. A number of themes have emerged from our extensive work advocating within these systems, and we urge you to consider the following when you ultimately create our province's Poverty Reduction Plan.

**Complicated bureaucracy as a barrier to justice**

People often require access to social systems when experiencing extremely negative circumstances (e.g. the loss of a job, threat of eviction, or a health crisis). In these stressful contexts, and combined with pre-existing vulnerabilities such as intergenerational poverty, an individual's capacity to navigate complicated government processes is extremely limited. Our clients are often unable to understand the steps that are necessary to secure the benefits they require, sometimes abandoning the process out of frustration or shame. For example, applying

for basic income assistance requires creating two separate government online accounts, both of which require a working email address, navigating a lengthy online application, providing extensive documentation, and being available for several phone interviews. Clients who attempt to attend an office for assistance with this process frequently report being turned away, sometimes in spite of documented accommodation needs due to disabilities.

While it is undoubtedly necessary to strengthen the rights afforded to people living in poverty, and increase the amount of monetary income assistance provided, these entitlements are worthless unless they are accessible to the people that need them. A fundamental culture shift within the government is necessary, transforming the mind-set from one of gatekeeping to one of proactively assisting people to access that to which they are entitled.

We anticipate that when the government creates the Poverty Reduction Plan it will be ambitious, and we are realistic that its implementation may take a considerable amount of time. While this process takes place, **we recommend that the government ensure that independent advocates specializing in these complicated processes are readily available throughout the province, and are adequately resourced to provide timely service to those needing help accessing systems.**

## Access

Previous governments have increasingly relied upon online mechanisms to provide important services and have removed options for in-person service. This creates difficulties accessing justice for low-income individuals who do not have access to a secure computer or a reliable phone line. In order to provide robust and effective services, **we recommend that a diversity of engagement opportunities are maintained at all times, including in person and efficient telephone services.**

Barriers to access can also be indirect. Many benefits require the physicians or other professionals to complete paperwork. Given that many people do not have reliable access to a doctor or to the medical system, these requirements act as tremendous barriers to accessing needed supports. For many the experience of approaching a medical professional for support in an application for benefits can be a difficult and sometimes demeaning experience. Even those who have regular family physicians struggle to convince them to complete applications or supporting documentation, and we commonly see applications filled out incorrectly due to lack of adequate time and preparation. **We recommend you review the current compensation and compliance system for medical professionals assisting in benefit applications, and create necessary changes to increase the level of support offered to low-income people.**

## Shift the burden of responsibility

It is also necessary to restructure certain systems to shift the burden of action away from the vulnerable party and onto the entity that typically holds more power in a given situation. For example, the Residential Tenancy Act currently requires the tenant to challenge eviction notices if they believe that the notice was issued incorrectly or in bad faith. Tenants regularly miss the deadline for challenging an eviction notice because they were unable to understand the required process, are unable to access supports, or were unable to juggle all of the competing pressures in their life. This encourages dishonest Landlords to serve notices in bad faith, taking a chance that the notice will go unchallenged and will be considered accepted by the tenant. **We recommend that the burden of action be shifted to the Landlord by requiring the Landlord to register a Notice of Eviction with the Residential Tenancy Branch before issuing it on a tenant, and to require landlords to provide proof that they are acting in good faith and have fulfilled all necessary legal pre-requisites before allowing that notice to be issued.**

Similarly, employees are required to confront their employer with Employment Standards complaints before engaging the mediation system. The process recommended by the self-help requires a worker to put themselves in a vulnerable situation before they can even request help from the government. **We recommend the government take a more proactive approach toward employers who are breaking the law, by investigating possible violations of the Act on behalf of workers, and ensuring compliance orders are enforced.**

### **Increased enforcement mechanisms**

It is extremely difficult for people living in poverty to enforce orders made in their favour within the Residential Tenancy and Employment Standards systems. It has been revealed that the Residential Tenancy Branch will be developing a new enforcement department, and we eagerly anticipate the details of this announcement, as it is currently extremely prohibitive for tenants to navigate the small claims court process in order to collect the debts owed to them. While the Employment Standards Branch has some form of enforcement available in the form of liens, it is not an effective process. Non-compliant employers can simply ignore the lien until they choose to sell the property in question. Even when they do sell, any private bailiff fees incurred in the process are paid before workers receive the settlement. The fines imposed on employers for noncompliance are negligible, and subject to the same restrictions on collection.

By contrast if a low-income person receives a fine for panhandling, or riding transit without a proper fare, such fines can lead to court appearances, outstanding warrants, and restrictions on access to identification and other government benefits. **Not only do we recommend you increase enforcement mechanisms available for people living in poverty, but we urge you to begin addressing the lack of proportionality and disparity in the level of punishment that exists in our justice system.**

## Conclusion

We are hopeful that the Poverty Reduction Strategy will lift thousands of British Columbians out of poverty, and wish to rearticulate our enthusiastic support for the BCPRC's well-articulated submission. Please do not hesitate to contact me if you require additional information or clarification regarding our perspective.

Sincerely,



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