

**IN THE SUPREME COURT OF CANADA  
(ON APPEAL FROM THE COURT OF APPEAL FOR BRITISH COLUMBIA)**

BETWEEN:

BRITISH COLUMBIA HUMAN RIGHTS TRIBUNAL

APPELLANT  
(Respondent)

and

EDWARD SCHRENK

RESPONDENT  
(Appellant)

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**MOTION RECORD FOR LEAVE TO INTERVENE OF THE PROPOSED  
INTERVENER, WEST COAST WOMEN'S LEGAL EDUCATION AND ACTION FUND**  
(Pursuant to Rules 47 and 55-59 of the Rules of the Supreme Court of Canada)

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**ORIGINAL TO: REGISTRAR OF THE SUPREME COURT OF CANADA**

**AND TO:**

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APPELLANT  
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EDWARD SCHRENK

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(Appellant)

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NOTICE OF MOTION TO A JUDGE OR THE REGISTRAR  
FOR LEAVE TO INTERVENE FILED BY THE PROPOSED INTERVENER, WEST  
COAST WOMEN'S LEGAL EDUCATION AND ACTION FUND  
(Pursuant to Rules 47 and 55-59 of the Rules of the Supreme Court of Canada)

---

**TAKE NOTICE** that West Coast Women's Legal Education and Action Fund Association ("West Coast LEAF") hereby applies to a Judge of this Court, at a date fixed by the Registrar of this Court pursuant to Rules 47, 55-59 of the *Rules of the Supreme Court of Canada*, for an order:

1. Granting West Coast LEAF leave to intervene in this appeal;
2. Permitting West Coast LEAF to file a factum of not more than ten (10) pages;
3. Permitting West Coast LEAF to present oral arguments at the hearing of this appeal of such length as this Court deems appropriate;
4. Providing that no order of costs of this motion and this appeal may be made for or against West Coast LEAF; and
5. Any such further or other Order that this Court may deem appropriate.

**AND FURTHER TAKE NOTICE** that the motion shall be made on the following grounds:

1. West Coast LEAF has a substantial interest in this appeal;
2. West Coast LEAF has established expertise and experience in relation to issues raised in this appeal, namely interpretation of the British Columbia Human Rights Code and discrimination in employment;
3. West Coast LEAF will advance submissions to the Court that are relevant to this appeal, useful to the Court, and different from those of other parties;
4. West Coast LEAF and its members would suffer prejudice if leave to intervene in this appeal is denied;
5. Rules 47 and 55 to 59 of the *Rules of the Supreme Court of Canada*; and
6. Such further and other grounds as counsel may advise and this Honourable Court may permit.

**AND FURTHER TAKE NOTICE** that the following documents are relied on by West Coast LEAF in support of this motion:

1. Affidavit of Robyn Trask, affirmed February 10, 2017;
2. The Memorandum of Argument of West Coast LEAF, dated February 13th, 2017; and
3. Such further and other material as counsel for West Coast LEAF may advise and this Honourable Court may permit.


Dated at Ottawa, Ontario this 13th day of February, 2017.

SIGNED BY:

  
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NOTICE TO THE RESPONDENT TO THE MOTION: A respondent to the motion may serve and file a response to this motion within 10 days after service of the motion. If no response is filed within that time, the motion will be submitted for consideration to a judge or the Registrar as the case may be.

**IN THE SUPREME COURT OF CANADA  
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BRITISH COLUMBIA HUMAN RIGHTS TRIBUNAL

APPELLANT  
(Respondent)

and

EDWARD SCHRENK

RESPONDENT  
(Appellant)

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**AFFIDAVIT OF ROBYN TRASK**  
(In support of West Coast LEAF's Application for Leave to Intervene)  
(Pursuant to Rules 47, 55, 56(b) and 57(1) of the Rules of the Supreme Court of  
Canada)

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I, Robyn Trask, of the City of Vancouver, in the Province of British Columbia, AFFIRM AS FOLLOWS:

1. I am the President of the West Coast Women's Legal Education and Action Fund Association ("West Coast LEAF"), and as such have knowledge of the matters hereinafter deposed to, except where stated to be based on information and belief in which case I verily believe them to be true.
2. I was called to the bar in Ontario in 2005 and the bar of British Columbia in 2008. I have been on the Board of Directors of West Coast LEAF since 2010, with the exception of a one year educational leave of absence in 2013-2014. I have been on the Executive of the Board since 2014 and I became President of the Board in 2015.
3. The appeal concerns the development of human rights law in British Columbia, and in particular whether section 13 of British Columbia's *Human Rights Code*, RSBC



1996, c. 210 (“the *Code*”) is limited in scope to protecting individuals from discrimination only in certain types of workplace relationships. West Coast LEAF has a demonstrable historical and continuing interest in ensuring that discrimination law develops in a manner that seeks to address and eliminate systemic discrimination and promote substantive equality for all people including, in particular, women, and seeks leave to intervene on that basis.

#### **A. Background and Expertise of West Coast LEAF**

4. West Coast LEAF is a non-profit society incorporated in British Columbia and registered federally as a charity. West Coast LEAF’s mission is to further women’s equality by changing historic patterns of systemic discrimination against women through British Columbia-based equality rights litigation, law reform activities and public legal education.

5. West Coast LEAF was created in April 1985, when the equality provisions of the *Charter* came into force. Prior to 2009, West Coast LEAF was a branch office of a national organization, Women’s Legal Education and Action Fund (“LEAF”). Both LEAF and West Coast LEAF grew out of the efforts of a group of women who, starting in the early 1980s, worked to ensure that sections 15 and 28 of the *Charter* would be effective in guaranteeing women substantive equality. Since 2009, West Coast LEAF has involved itself in litigation in its own name while continuing to work closely with LEAF.

6. West Coast LEAF employs seven full-time staff and two part-time staff. During the last fiscal year, West Coast LEAF had approximately 350 individual and organizational members and relied on the support of approximately 200 volunteers to carry out its work.

7. West Coast LEAF acts to promote the equality interests of all women in British Columbia, paying particular attention to intersectional disadvantage arising for women because of race, national origin, immigration status, sexual preference or identity, family or marital status, disability, age, socio-economic status or other personal characteristics. West Coast LEAF is committed to working in consultation and collaboration with other equality-seeking groups to ensure that West Coast LEAFs legal positions, law reform

activities and educational programming are informed by, and inclusive of, the diversity of women's experiences. West Coast LEAF also consults and collaborates with leading equality rights academics and practitioners to ensure the consistently high calibre of its work.

8. Litigation is one of West Coast LEAF's three program areas. Through litigation, West Coast LEAF has contributed to the development of equality law and human rights jurisprudence.

9. West Coast LEAF has intervened, or is intervening, in its own name in the following cases before this Court and the Court of Appeal for British Columbia:

- (a) *Denton v. Workers Compensation Board*, Court of Appeal File No. CA43825 (hearing scheduled for March 7-8, 2017) (ongoing)
- (b) *Trinity Western University and Volkenant v. Law Society of British Columbia*, 2016 BCCA 423;
- (c) *Scott v. College of Massage Therapists of British Columbia*, 2016 BCCA 180;
- (d) *R. v. Lloyd*, 2016 SCC 13;
- (e) *Vancouver Area Network of Drug Users v. Downtown Vancouver Business Improvement Association*, Court of Appeal File No. CA042770 (heard October 5-6, 2016) (ongoing);
- (f) *British Columbia Public School Employers' Association v. British Columbia Teachers' Federation*, 2014 SCC 59;
- (g) *Trial Lawyers Association of British Columbia v. British Columbia (Attorney General)*, 2014 SCC 59;
- (h) *Vilardell v. Dunham*, 2013 BCCA 65;
- (i) *British Columbia (Ministry of Education) v. Moore*, 2012 SCC 61;

(j) *Friedmann v. MacGarvie*, 2012 BCCA 445;

(k) *SWUAV v. Canada*, 2012 SCC 45 and 2010 BCCA 439;

(l) *Shewchuk v. Ricard*, [1986] B.C.J. No. 335, 28 D.L.R. (4th) 429 (BCCA);

10. West Coast LEAF has been granted leave to intervene or participate as an interested person at the trial level before judges of the British Columbia Supreme Court on five occasions: *British Columbia Civil Liberties Association and John Howard Society of Canada v. Canada* (File No. S-150415, Vancouver Registry) (leave to intervene granted December 15, 2016; entry of order pending); *Trinity Western University and Volkenant v. Law Society of British Columbia*, 2015 BCSC 2326; *Vancouver Area Network of Drug Users v. Downtown Vancouver Business Improvement Association*, 2015 BCSC 534; *Inglis v. British Columbia (Minister of Public Safety)*, 2013 BCSC 2309; and *Reference re Criminal Code of Canada (BC)*, 2011 BCSC 1588 (the *Polygamy Reference*).

11. West Coast LEAF also intervened as part of a coalition of six organizations in an inquiry before the Canadian Judicial Council: In the Matter of an Inquiry Pursuant to Section 63(1) of the *Judges Act* Regarding the Honourable Justice Robin Camp (Report and Recommendation of the Inquiry Committee to the Canadian Judicial Council, dated November 29, 2016).

12. West Coast LEAF has also worked with LEAF on a number of interventions, either by taking a leading role in cases or by providing background information and support to LEAF.

13. West Coast LEAF took a leading role in the interventions carried out under LEAF's name in the following cases: *Rick v. Brandsema*, 2009 SCC 10; *R. v. Watson*, 2008 BCCA 340; *Smith (Guardian ad litem) v. Funk*, 2003 BCCA 449; *R. v. Demers*, 2003 BCCA 28; *Blencoe v. British Columbia (Human Rights Commission)*, 2000 SCC 44; and *British Columbia (Public Service Employee Relations Commission) v. British Columbia Government and Service Employees' Union (B.C.G.S.E.U.) (Meiorin Grievance)*, [1999] 3 S.C.R. 3.

14. West Coast LEAF provided background information and support to LEAF's intervention in the following cases: *Blackwater v. Plint*, 2005 SCC 58; *Newfoundland (Treasury Board) v. N.A.P.E.*, 2004 SCC 66; *Canada (Attorney General) v. Lesiuk*, 2003 FCA 3; *Miller v. Canada (Attorney General)*, 2002 FCA 370; *R. v. Shearling*, 2002 SCC 58; *Falkiner v. Ontario (Ministry of Community and Social Services, Income Maintenance Branch)*, [2002] O.J. No. 1771, 59 O.R. (3d) 481 (C.A.); *Little Sisters Book and Art Emporium v. Canada (Minister of Justice)*, 2000 SCC 69; and *Brooks v. Canada Safeway Ltd.*, [1989] 1 S.C.R. 1219.

15. West Coast LEAF's second program area is law reform. West Coast LEAF's law reform initiatives seek to ensure that all legislation and policies in British Columbia support equality for women pursuant to the *Charter*, human rights legislation and the United Nations *Convention on the Elimination of all forms of Discrimination against Women* ("CEDAW"), to which Canada is a signatory. West Coast LEAF's law reform work consists of conducting comprehensive community-based research and analysis, drafting best practices and policy recommendations, making submissions to governmental and other decision-makers on a range of issues impacting women's equality and evaluating the progress of British Columbia towards equality for women on obligations established in CEDAW.

16. Public legal education rounds out West Coast LEAF's major program areas. West Coast LEAF's educational programming aims to help residents of British Columbia understand and access their equality rights, and to think critically about the law as it affects them. The program aims to transform public legal education, collaborate with diverse equality seeking groups, distribute public legal education materials and build upon other West Coast LEAF initiatives. West Coast LEAF's public legal education projects are based on collaboration with other groups and complement its litigation and law reform activities, based on the premise that the first step toward asserting rights is understanding them.

17. West Coast LEAF has significant expertise in applying principles of substantive equality to constitutional and legislative interpretation, the development of the common



law and state action that impacts women's lives. This expertise extends to articulating the equality rights at issue in contexts where sex inequality is compounded by other markers of stigma and disadvantage, including race, Indigeneity, disability and socio-economic status.

## **B. West Coast LEAF's Expertise and Interest in the Appeal**

18. In contributing to the development of equality jurisprudence in Canada, West Coast LEAF has developed considerable expertise in the development of human rights law, including how the discrimination analysis under British Columbia's human rights legislation functions for marginalized and vulnerable complainants.

19. In this regard, West Coast LEAF has a demonstrated and substantial interest and expertise in the issues raised on this appeal. We have a long history of work ensuring that the test for discrimination under human rights legislation and in the *Canadian Charter of Rights and Freedoms* develops in a manner that promotes substantive equality. Our work concerning the development of human rights and equality jurisprudence includes the following:

- (a) West Coast LEAF is an intervener (in coalition with another organization) in *Vancouver Area Network of Drug Users v. Downtown Vancouver Business Improvement Association* at the BC Supreme Court (2015 BCSC 534) and at the BC Court of Appeal (File No. CA042770; heard October 5-6, 2016; judgment on reserve). This case concerns the legal test for *prima facie* discrimination under the *Code* and the evidence required to demonstrate a connection or nexus between protected grounds and adverse treatment. West Coast LEAF's submissions are focused on the need for a flexible, liberal and purposive approach to the types of evidence sufficient to prove *prima facie* discrimination;
- (b) Since 2009, West Coast LEAF has published an annual report card which grades British Columbia in nine key areas of women's rights against the obligations set out in the United Nations' Convention on the Elimination of

Discrimination against Women. As in past years, West Coast LEAF's 2016 CEDAW Report Card gives low to failing grades to BC's overall action to remedy discrimination against women. In 2016, West Coast LEAF appeared at the UN CEDAW Committee's periodic review of Canada's fulfilment of its obligations in respect of women's rights in Geneva, prepared a shadow report as part of the BC CEDAW Group coalition, and called for a comprehensive and holistic national gender equality plan to address all forms of discrimination against women and girls;

- (c) West Coast LEAF intervened in *Trinity Western University v. Law Society of British Columbia* at the BC Supreme Court (2015 BCSC 2326) and BC Court of Appeal (2016 BCCA 423; leave to appeal to this Court pending) to argue that the university's community covenant discriminates on the basis of sex, sexual orientation and marital status;
- (d) Through law reform efforts, West Coast LEAF has repeatedly called on legislators at the provincial and federal levels to protect the human rights of trans\* persons. For instance, in 2016, West Coast LEAF called on Members of the Legislative Assembly to pass *Bill M-222 Human Rights Code (Recognition of Gender Identity and Gender Expression) Amendment Act, 2016* in support of the ongoing evolution of the term sex in human rights law to clearly and expressly recognize protection for gender identity and gender expression in the Code. In 2014, West Coast LEAF called on Senators from British Columbia to pass *Bill C-279: An Act to amend the Criminal Code and the Canada Human Rights Act (Gender Identity)* to prevent discrimination against trans\* persons and to provide trans\* persons with protection from hate crimes;
- (e) West Coast LEAF was granted leave to intervene before this Court in *British Columbia Teachers' Federation v. British Columbia Public School Employers' Association*, 2014 SCC 70. In that case, West Coast LEAF argued that a parental leave supplemental employment benefits scheme that treated pregnancy leave and benefits and parental leave and benefits as serving the



same purpose, without regard to the distinct burden of pregnancy, child-birth and post-partum recovery on birthing mothers, constituted unlawful discrimination;

- (f) West Coast LEAF intervened before the BC Supreme Court in *Inglis v. British Columbia (Minister of Public Safety)*, 2013 BCSC 2309, a case concerning the constitutionality of the cancellation of a mother-baby program at a women's correctional facility in British Columbia. Among other things, West Coast LEAF's submissions focused on the need for a robust contextual approach to substantive equality in line with the evolution of section 15 equality jurisprudence under the *Charter*;
- (g) West Coast LEAF was granted leave to intervene by this Court in *Moore v. British Columbia (Education)*, 2012 SCC 61, a case which argued that cancelling a special education program for financial reasons amounted to a failure to accommodate disability contrary to the *Code*. Among other things, West Coast LEAF's submissions highlighted the dangers of importing the requirements of section 15 *Charter* jurisprudence into the *prima facie* test for discrimination in the *Code*;
- (h) West Coast LEAF appeared as an intervener at the BC Court of Appeal in *Friedmann v. MacGarvie*, 2012 BCCA 445, a case concerning whether sexual harassment constitutes sexual discrimination for the purposes of section 10 of the *Code* in the context of residential tenancies. West Coast LEAF argued that sexual discrimination is *per se* discrimination based on sex and that, once a finding of sexual harassment has been made, no further analysis is required to determine *prima facie* discrimination under the *Code* for all areas covered by the *Code*, including tenancy;
- (i) In 2011, West Coast LEAF was invited to make submissions to the BC Human Rights Tribunal's review of its policies and procedures. West Coast LEAF submitted that access to a competent and effective tribunal with the ability to

order meaningful remedies for human rights violations is a vital component of women's equality and ability to participate in public life;

- (j) In 2010, West Coast LEAF made submissions to the British Columbia Law Institute (BCLI) when BCLI was commissioned by the Ministry of Labour to conduct research and analysis of workplace dispute procedures, including the role of the BC Human Rights Tribunal. West Coast LEAF submitted that the elimination of the Human Rights Tribunal – the only specialized human rights administrative body in the province – would have a profoundly negative impact on vulnerable individuals, particularly those experiencing intersecting markers of disadvantage; and
- (k) For over ten years, West Coast LEAF has offered Youth in the Workplace workshops in the Lower Mainland, Kamloops and Nanaimo. These workshops examine employment rights, human rights, and discrimination regarding employment and are aimed at a young adult audience. The program has its roots in the judgment of this Court in *Janzen v. Platy Enterprises Ltd.*, [1989] 1 SCR 1252 which found sexual harassment to be a form of discrimination on the basis of sex under human rights legislation. The workshops are aimed at providing tools and knowledge to help young adults assert their rights in the context of complex power dynamics.

20. The outcome of the case at bar is significant for the realization of West Coast LEAF's mandate, to its membership and the communities it serves. Ensuring that the test for discrimination in the context of workplace relationships remains attuned and responsive to intersectional disadvantage falls squarely within the ambit of West Coast LEAF's core areas of expertise and concern.

### **C. West Coast LEAF's Proposed Intervention**

21. I have reviewed the Memorandum of Argument included in this Motion Record, and confirm that it is an accurate reflection of the proposed submissions that West Coast LEAF intends to make should it be granted leave to intervene in this appeal. If granted

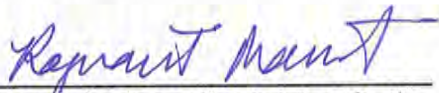
leave to intervene, West Coast LEAF will take no position in respect of the ultimate outcome of the appeal.

22. The Applicant's request for leave to intervene in this appeal is limited to making written and oral submissions on the questions of law upon which leave to appeal has been sought. The Applicant is not seeking leave to adduce fresh evidence.

23. West Coast LEAF seeks leave to intervene in this appeal to ensure that the legal test for discrimination regarding employment under the *Code* reflects the reality of systemic, intersectional disadvantage arising from characteristics including an individual's sex, race, religion, ancestry, sexual orientation and/or (dis)ability. West Coast LEAF's expertise in human rights and substantive equality offers a unique and important perspective that would be of assistance to this Court.

24. If granted leave, the Applicant will work in cooperation with the parties and other possible interveners, and ensure that its presence as an intervener will not interfere with the parties' ability to achieve determination of the issues at stake for them in this litigation.

AFFIRMED BEFORE ME at the City of )  
Vancouver, in the Province of )  
British Columbia, this 10th day )  
February 2017. )  
)  
)  
)  
)  
)  
)

  
A Commissioner for taking Oaths  
in British Columbia

  
ROBYN TRASK

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