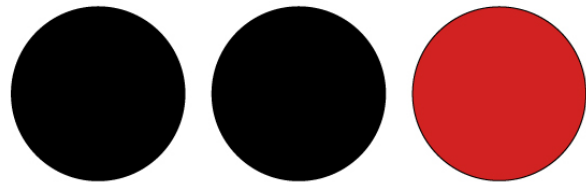




**BATTERED WOMEN'S  
SUPPORT SERVICES**



**Safety Changes Everything**

August 31, 2022

Grace Lore  
Parliamentary Secretary for Gender Equity  
Parliament Buildings Victoria, British Columbia V8V 1X4

VIA EMAIL: [Grace.Lore@gov.bc.ca](mailto:Grace.Lore@gov.bc.ca)

**Regarding: BC's proposed Pay Transparency Legislation**

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Dear Parliamentary Secretary Lore,

I am writing to you on behalf of Battered Women's Support Services (BWSS). Battered Women's Support Services provides education, advocacy, and support services to assist women experiencing gender-based violence. We work from a feminist perspective to eliminate gender-based violence and to promote gender equity. For over forty years, we have been working towards ending violence against women, girls, femmes, LGBTQ2S, and non-binary survivors of violence. Our specialized services team provides crisis intervention, legal advocacy, counselling and support, and information and referral services to meet survivors' individual complex needs. We also provide violence prevention and intervention services, as well as community education and training programs to end gender-based violence.

We are writing today regarding BC's development of pay transparency legislation.

As you know, according to a 2018 study by Statistics Canada, BC has the [largest gender pay gap in Canada](#), with women in BC making, on average, 18.6 per cent less than men. Our province remains as one of four provinces (along with Alberta, Saskatchewan, and Newfoundland) that does not have pay transparency or pay equity laws. Pay equity is a human rights issue, and a matter of substantive equality. Our governments must eliminate systemic discrimination in the workplace by ensuring equal pay for equal work through pay transparency legislation.

Indigenous women, Black women, racialized women, newcomer immigrant/refugee women, and trans and two spirit people face compounding discrimination in employment, and the greatest barriers to pay equity. The Canadian Women's Foundation has found that [only 27 percent](#) of women and gender-diverse people report being paid equally to their peers. [Census data](#) shows that Indigenous, racialized, and newcomer immigrant/refugee women working full-time, full year earn significantly less than white people of all genders and less than racialized men. Specifically, racialized women make approximately [59.3 percent](#) of what white men make in the workforce. Racialized women are also most heavily concentrated in already underpaid, and often the lowest paying, jobs, especially the "5C's" of caring, clerical, catering, cashiering, and cleaning. The [United Nations Human Rights Committee](#) has raised concerns about the high level of the pay gap in Canada and its disproportionate effect on low-income women, racialized women, and Indigenous women.

We are hopeful that your work towards developing pay transparency legislation in BC will uphold human rights and gender equity for all. As a guiding principle, any legislation must eliminate all pay inequity. This includes the structural inequality of women earning lower incomes than men for the same work, and the fact that women tend to be clustered at the bottom of lower-paid, minimum-wage jobs.

**As you work towards proposing pay transparency legislation in BC, we urge you to consider the following three key issues and benchmarks:**

1. Pay transparency requires employers to disclose the wage structures in their workplaces and helps to promote and enforce gender equality. Pay transparency legislation must be mandatory across all sectors, both public and private, and be subject to strong enforcement mechanisms and independent oversight. BC's pay transparency legislation should include the minimum stipulations provided in Ontario's pay transparency legislation, including requiring employers to include a salary range and benefits for all posted jobs, and prohibiting employers from punishing employees for disclosing their compensation. Furthermore, such legislation must prohibit employers from seeking any information about a job applicant's previous compensation history, which reinforces the gender pay gap by limiting the earnings of female employees based on the status-quo of a history of under-compensation.
2. Pay transparency legislation must enable thorough and comprehensive disaggregated reporting on an annual basis. Such reporting must accomplish the goal of providing meaningful statistics and robust data to allow for an intersectional analysis of an employer's pay structure across a range of demographic characteristics and over time and across sectors.
3. Pay transparency legislation must be followed by the development and introduction of pay equity legislation. Pay equity policies require employers to make plans to close the wage gap. This would require employers to collect and disclose wages based on job classes, determined based on factors required by the law such as skill, effort, responsibility, and working conditions. Legislation must require employers to compensate a job class for people of marginalized genders at an equal level if it is lower than the cis-male job class. This would require a robust administrative and regulatory regime, including future legislation enabling penalties for any employer who does not take the appropriate steps to closer their gender (and other) pay gap.

Pay transparency and, more importantly, pay equity is critical to ensuring the safety of survivors of gender-based violence. Financial dependence is a significant contributor to gender-based violence. The reality of the gender pay gap, even further exacerbated across race, means that Indigenous, Black, newcomer immigrant/refugee, and racialized women are most likely to earn less than men in similar jobs, are most likely to be minimum wage earners in the province, and are most likely to retire with smaller pensions in older age – thus cementing a lifetime of the racial feminization of poverty. In addition, unpaid caregiving responsibilities disproportionately fall on women, which further impacts economic security. All of this leaves survivors of violence with even fewer choices, often forcing them to remain in violent situations.

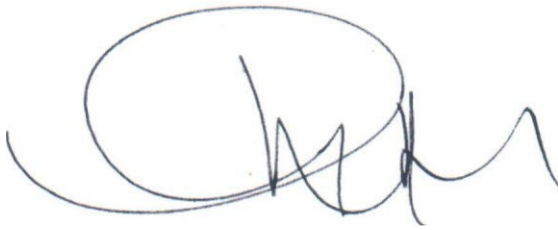
This is why we believe that addressing pay equity, **and all forms of gender inequality**, is central to eliminating gender-based violence. While pay transparency legislation is a step in the direction of gender equality, it alone absolutely does not address the systemic racialization and feminization of poverty. This would require a whole-of-government approach to tackle a series of issues including:

- Unlivable social assistance, disability, and pension rates for survivors who are not in the formal, paid workforce, especially for those with disabilities and/or seniors.
- Systemic racial and gendered labour market discriminations, including employer harassment and wage theft, especially for Indigenous and Black women in the workforce.

- The lack of recognition of foreign credentials for newcomer immigrant/refugee women that continues to stratify newcomers into the lowest paid jobs. This precarity is magnified for migrants without full residency or citizenship status, and who routinely face further exploitation in the workforce.
- Reversing a long trend of economic restructuring towards austerity that continues to disproportionately impact racialized women and force them into underpaid, part-time, insecure, and precarious work, while also juggling unpaid care responsibilities.

This all must be a provincial priority. Thank you for your consideration of this matter and I would be pleased to discuss these issues further. If you or your staff require additional information, I can be reached at by phone at 604-808-0507 or by email at [director@bwss.org](mailto:director@bwss.org).

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'AM MacDougall', with a large loop at the beginning and a sharp peak at the end.

Angela Marie MacDougall  
Executive Director  
BWSS Battered Women's Support Services Association