

Honourable Minister Shane Simpson
Minister of Social Development and Poverty
Reduction

Honourable Minister Michelle Mungall
Minister of Jobs, Economic Development and
Competitiveness

Honourable Minister Scott Fraser
Ministry of Indigenous Relations and Reconciliation

Honourable Minister Anne Kang
Minister of Citizens' Services

Honourable Minister Judy Darcy
Minister of Mental Health and Addictions

Honourable Selena Robinson
Minister of Municipal Affairs and Housing

Honourable Lisa Beare
Minister of Tourism, Arts and Culture

Honourable Minister Harry Bains
Minister of Labour

Honourable Minister Rob Fleming
Minister of Education

Honourable Melanie Mark
Minister of Advanced Education, Skills and Training

Honourable Carole James
Minister of Finance

Honourable Katrine Conroy
Minister of Children and Family Development

Honourable Adrian Dix
Minister of Health

Honourable David Eby
Attorney General

Dr. Bonnie Henry
Provincial Health Officer

Via email: SDPR.minister@gov.bc.ca, JTT.Minister@gov.bc.ca, doug.caul@gov.bc.ca, CITZ.Minister@gov.bc.ca, MAH.minister@gov.bc.ca, EDUC.Minister@gov.bc.ca, AVED.Minister@gov.bc.ca, FIN.Minister@gov.bc.ca, MCF.Minister@gov.bc.ca, hlth.dmoffice@gov.bc.ca, MH.Minister@gov.bc.ca, AG.Minister@gov.bc.ca, bonnie.henry@gov.bc.ca, TAC.Ministry@gv.ca.bc, LBR.Minister@gov.bc.ca, **CC:** BC Ombudsperson; info@ombudsperson.ca, Office of the Seniors Advocate; info@seniorsadvocatebc.ca, Representative for Children and Youth; rcy@rcy.bc.ca

September 22nd, 2020

Re: Digital Justice for B.C. policy proposal

Dear Dr. Bonnie Henry and Honourable Ministers,

Thank you very much for the opportunity to bring our concerns and recommendations to your attention today. We have witnessed how diligently government has worked to protect the well-being and livelihoods of many in B.C. throughout the COVID-19 pandemic. However, we are writing today to respectfully bring your attention to a hazardous gap in our federal and provincial emergency pandemic responses, and to introduce our call for action.

The COVID-19 pandemic has revealed the depth and breadth of the digital divide in B.C. Low-income British Columbians and Coalition members have brought to our attention the additional stress, isolation, and fear that digital inequality has created. We note that **34% of British Columbians earning less than 30,000 a year do not**

have home Internet access.¹ Internet costs in this Province and across Canada are some of the highest in the world and households must make difficult budget choices to maintain connectivity or remain shut out.

We have heard from many about the impact of the closure of libraries and public access points at the height of the pandemic. Those living below the poverty line who cannot afford costly monthly at-home access were dangerously cut off. Low income communities in rural, remote and on reserve communities were left struggling with the dual challenges of accessibility and affordability. Access to a broad diversity of services and amenities, from our justice system, to health and mental health care, education, social services, jobs, and ministry supports spanning at least 12 provincial ministries, are largely dependent on Internet access currently.

The BC Poverty Reduction Coalition and allies are writing to share our vision for a comprehensive emergency response to tackle the digital divide in B.C. that leaves no impacted community member behind. In a world largely shifted online we must take action to ensure we do not widen inequality through inequitable access to digital technologies. Our four-fold recommendation to government targets policies and initiatives to urgently address affordability and access to technology, protect access to education and health care, and increase digital literacy training to eliminate the pre-existing and growing digital divide in B.C. as the pandemic continues.

We recommend the Province **make \$10-a-month Internet available to all low-income individuals living below the poverty line in B.C.**, regardless of their age, and to prioritize anyone who accesses any public education program including K-12, post-secondary, adult-upgrading and ESL. We recommend this includes all those on fixed incomes including those on disability and income assistance, all seniors receiving the Guaranteed Income Supplement, and all former and current youth in care.

Another primary recommendation is to build on the B.C. Technology for Learning initiative and **provide a B.C. Technology Fund** that provides non-repayable tech grants to all those who qualify and enroll in the \$10-a-month initiative. This ensures everyone in the program can access the personal technology and devices necessary for them to achieve unlimited at-home access. Increased **province-wide digital literacy training** to address safety, privacy and security online is essential for all in B.C., now more than ever.

We have heard from low-income communities about the challenges they have encountered trying to access education without adequate Internet access through the pandemic. As we know, access to education is fundamentally linked to poverty reduction, and inequitable access during the pandemic has the potential to negatively impact education and poverty reduction outcomes for children, youth, and adults. This situation will not change in a post-pandemic British Columbia. We urge government to recognize the inextricable link between Internet access and access to education during the pandemic. Now is the time to address these inequalities as we also prepare for recovery.

Thank you for the opportunity to emphasize the importance of **prioritizing the unique challenges of rural, remote, and Indigenous connectivity and newcomer communities in B.C.** We propose a clearly defined equity approach that prioritizes on and off reserve Indigenous access, the leadership of the First Nations Technology Council, and access for racialized and newcomer communities.

¹ Canadian Radio and Telecommunications Report (CRTC) (2020). *2019 Communications and Monitoring Report*. Retrieved from: <https://crtc.gc.ca/pubs/cm2019-en.pdf> [crtc.gc.ca]

In 2016, the United Nations declared access to the Internet a human right.² That same year, the Canadian Radio-television and Telecommunications Commission (CRTC) declared broadband internet access a basic service in Canada.³ Our Digital Justice for B.C. policy proposal is rooted in a human rights approach (please see our attached principles) that addresses affordability. It is important to point out that Internet access is not only a right itself but an essential gateway to access other fundamental human rights such as health care, education, and community life.

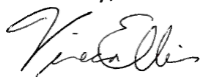
The pandemic has further revealed that affordable, fast, unlimited Internet access is as essential to a home as a fridge and stove, as heat and hot water; we would not build a home without them. To close the digital divide, we further suggest government begins to build \$10-a-month access into all affordable housing in B.C., including B.C. Housing units, supported and non-profit housing including affordable rental and assisted living, existing and new modular units, and shelters and transition housing.

Existing initiatives that target affordability illustrate the dangers of limited and piecemeal programs, though provide a promising foundation to build on. The federal Connecting Families program disqualifies families when children turn 18 and prioritizes only very low-income families.⁴ A recently announced TELUS initiative provides only a time-limited discount solely to those on disability assistance.⁵ Such fragmented initiatives parse communities in need from each other unnecessarily by prioritizing some and leaving thousands behind. This approach compounds inequality in this province among those living below the poverty line. Such an approach doesn't meet our legislated commitment to prioritize poverty reduction for not just two, but thirteen equity-seeking communities in B.C.⁶ We can do much better by targeting all equity-seeking groups and closing the digital divide for all below the poverty line in B.C.

We propose ultimately moving beyond the monopoly of big telecom and the commodification of digital access towards publicly provided broadband. At this unprecedented time, our lives and livelihoods, our connections with family and community, and our daily well-being and survival very much depend on Internet access in the confinement and safety of our homes. Thank you for the opportunity to share our vision for an equitable and comprehensive provincial approach to urgently address the digital divide in B.C., one that ensures not one person in B.C. is left alone, disconnected and falling behind during the pandemic, and beyond.

We look forward to further discussing how to end the digital divide in B.C.

Sincerely,



Viveca Ellis

BC Poverty Reduction Coalition viveca@bcpovertyreduction.ca

*In solidarity with Digital Justice for B.C. Working Group members (below) and all BCPRC Coalition members:
BC ACORN, BC Teachers' Federation, CUPE BC, First Nations Technology Council, MOSAIC, PovNet,
Dr. Suzanne Smythe; Faculty of Education, SFU, UBC Learning Exchange*

² https://www.itu.int/net/wsis/outcome/booklet/declaration_A.html

³ <https://www.cbc.ca/news/politics/crtc-internet-essential-service-1.3906664>

⁴ <https://www.ic.gc.ca/eic/site/111.nsf/eng/home>

⁵ <https://www.telus.com/en/about/company-overview/community-investment/how-we-give/cause-campaigns/internet-for-good>

⁶ [https://www.bclaws.ca/civix/document/id/complete/statreg/18040/search/CIVIX_DOCUMENT_ROOT_STEM:\(poverty%20reduction\)?2](https://www.bclaws.ca/civix/document/id/complete/statreg/18040/search/CIVIX_DOCUMENT_ROOT_STEM:(poverty%20reduction)?2)

Digital Justice for B.C. Campaign Principles

Human Rights Based Approach. Digital Justice for B.C. is rooted in a human rights foundation. This approach positions access to the Internet as a human right and a basic service that must be universally available to all regardless of income. Digital access is about connectivity, and this includes four key factors: affordability, speed, latency, and security. A human rights foundation determines that we advocate for long-term, unlimited, and stable connectivity that prioritizes at-home access within a regulatory policy framework addressing digital equity, access, privacy, and surveillance. We propose moving beyond the monopoly of big telecom and the commodification of digital access towards publicly provided broadband.

Right to education. We propose that digital access is inseparable from the right to education for children, youth and adults in B.C. Digital Justice for B.C. aims to uphold every citizens' right to education in all its forms. It is important that digital access goes hand in hand with digital literacy education with respect to online safety, participation, and privacy. It is important to note we are not proposing an increase in online learning or the replacement of face-to-face and in-person learning with online learning.

Right to health care. During the pandemic, crucial mental health and other forms of health services shifted online. More and more, access to information about health and health care delivery, including test results and outcomes, has shifted online. Telehealth and telemedicine are instrumental for healthcare delivery in rural and remote areas of the province. Connectivity is instrumental to accessing adequate healthcare and health-related information in B.C.

No one left behind. Our human rights-based approach proposes a universal approach rather than income-testing or prioritizing certain demographics over others in federal or provincial programs. Also, we start with groups that are the hardest to connect, first, not last.

Spectrum Sovereignty and UNDRIP. Digital Justice for B.C. approaches this issue within our aim to uphold the implementation of UNDRIP in B.C. Our policy framework positions Internet connectivity as **spectrum sovereignty** in the context of Indigenous sovereignty over all territory including land, air, and water. Addressing Indigenous peoples' digital access must include their participation in decisions related to Internet infrastructure both on and off-reserve. Digital Justice for B.C. supports the Indigenous Framework for Innovation and Technology and the First Nations Technology Council.

Participatory frameworks to ensure citizen input. We advocate for intentional, planned, consultative infrastructure development. Current piecemeal, one-off buildouts and compensatory programs continue to exclude the most marginalized communities. We propose the development of a collaborative, participatory framework and approach to telecom infrastructure development that enables citizens to have input and impact in B.C. Digital Justice for B.C. supports and amplifies existing digital rights campaigns and community-led organizing by those most impacted by the issue.

Digital equity and multi-sector policy development. We seek to impact other policy actors and sectors around the importance of digital connectivity and infrastructure. We advocate that Internet access is 'built-in' to homes the same way a fridge is built in, as an essential element in our definition of a home. This includes building it into all existing and new non-market rental housing and housing starts, all B.C. Housing units, modular, non-profit, co-operative, and supported living units, shelters, and transition homes.

Ongoing data collection. We advocate for the ongoing collection and assembly of connectivity and other data to inform policy and decision making as provincial services and new policies are rolled out. We propose that while we need to establish

ongoing collection of community-accessible data,
we already have all the sufficient data necessary to
know we need to take decisive action now.

Digital Justice for B.C. Information Sheet

Summary of Recommendations

Digital Justice for B.C. proposes publicly provided, universally available high-speed at-home Internet access for all in B.C. regardless of immigration or citizenship status.

IMMEDIATE TERM STEPS:

1. \$10 a month high-speed at-home Internet access for all living at or below the Market Basket Measure poverty line in B.C., with immediate implementation. This includes all those on fixed incomes and all former and current youth in care. Continue to provide and support enhanced public Internet access points.
2. \$10 a month high-speed at-home Internet access for all in B.C. who participate in any educational program in B.C. with immediate implementation. This includes all households with children and youth accessing k-12 education or schooling at home for any reason, all those accessing college, university or vocational training programs, non-profit provided adult learning, ESL, and all programs for settlement communities.
3. Fund and provide a B.C. Technology Fund that provides non-repayable grants to all those who qualify and enroll in the \$10-a-month affordability initiative. Ensure each individual and family member in the program can access the personal technology and devices necessary for them to achieve unlimited at-home Internet access.
4. Increase funding to provide enhanced digital literacy training to address online safety, security, privacy and disinformation available to all enrolled in the \$10-a-month access initiative and all in B.C. Increased training to be universally accessible throughout the province at publicly-funded, publicly-available settings such as community centres and libraries, and in a diversity of educational and non-profit settings.

**Special thank you to Dr. Suzanne Smythe, Faculty of Education, Simon Fraser University, for her contribution to the data cited in Digital Justice for B.C. documents.*

The case for universal access: Internet access is a human right

In 2016, the United Nations declared the Internet a human right. An amendment was made to the Universal Declaration of Human Rights to enshrine Internet access and “the promotion, protection and enjoyment of human rights on the Internet.”⁷ That same year, the Canadian Radio-television and Telecommunications Commission (CRTC) declared broadband internet access a basic service in Canada. This historic precedent was won by advocacy groups including ACORN Canada and Open Media, who have long focused on closing the digital divide for low-income communities. It is time for Canada and B.C. to achieve the United Nation Sustainable Development Goal 9C now, which aims to ‘significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet in least developed countries by 2020.’⁸

A principle defining the United Nations human rights approach illustrates the importance of a ‘commitment to build a people-centred, inclusive and development-oriented Information Society, where everyone can create, access, utilize and share information and knowledge, enabling individuals, communities and peoples to achieve their full potential.’⁹

Digital inequality is a matter of income.

The Canadian Radio and Telecommunications Commission (CRTC) found that only 69% of Canadians in the 1st Income quintile (earning less than 33,000 annually) had access to the Internet at home in 2017 (CRTC, 2019) compared to 94.5% in the 5th Quintile (earning more than \$132,909 annually).¹⁰ Similarly, only 63% of Canadians in the 1st Income Quintile have access to a working home computer compared to 95% of those in the 5th Quintile. The quality and speed of Internet connectivity also matters; many British Columbians do not have access to Internet that even approximates the 50 Mps download and 10 Mps upload speeds needed for most online activities, particularly in rural and remote areas.¹¹

Pushing beyond Canada and B.C.’s slow and incremental progress.

The Federal Government has responded with small scale projects and income-tested Internet access programs for low-income families such as Connecting Families.¹² Connecting Families targets families receiving the maximum Canada Child Benefit, with a modest 10mbps Internet with 100gb usage for \$10 per month, up to March 2022. Around 220,000 households - up to 600,000 people - were expected to benefit from the program. However, just targeting low income families who access the maximum Canada Child Benefit leaves many behind, and when a child turns 17, the initiative is cut off leaving families abruptly without Internet access. According to the CRTC’s own data, and as documented in ACORN’s report *Barriers to Digital Justice in Canada*, almost half of households with an annual income of \$30,000 or less do not have high-speed internet access.¹³ Canada lagged behind at 29th for broadband access, use and skills compared with other countries in 2017 (the US ranks 16th and the UK ranks 5th) in the International Telecommunications Union’s ICT Development Index.¹⁴

⁷ https://www.article19.org/data/files/Internet_Statement_Adopted.pdf

⁸ <https://indicators.report/targets/9-c/>

⁹ https://www.itu.int/net/wsis/outcome/booklet/declaration_A.html

¹⁰ <https://crtc.gc.ca/eng/publications/reports/policymonitoring/2019/cmr.htm>

¹¹ <https://openmedia.org/article/item/social-distancing-reinforcing-canadas-digital-divide>

¹² <https://www.ic.gc.ca/eic/site/111.nsf/eng/home>

¹³ <https://acorncanada.org/resource/barriers-digital-equality-canada>

¹⁴ <https://acorncanada.org/resource/barriers-digital-equality-canada>

In Budget 2019, the Federal Government announced a national target; to have 95 per cent of Canadian homes and businesses accessing Internet speeds of at least 50/10 Mbps by 2026 and 100 per cent by 2030, no matter where they are located in the country. This goal is in line with the broadband Internet speed objective set by the CRTC for Canadian households and businesses across Canada. However, despite this significant investment, much more action must be taken to address how this policy directly impacts communities, the extent to which citizens can impact the policy, and the necessity of addressing affordability and rural connectivity as a key aspect of access.

Prioritizing all communities and all citizens in need.

Recently, TELUS announced an expansion of the TELUS Internet For Good initiative, with \$9.95 a month Internet now available to those accessing disability assistance in Alberta and British Columbia, impacting 110,000 in B.C.¹⁵ Unfortunately, this discount is only available for 24 months after enrollment after which a household is bumped up to regular competitive rates. It falls far short of meeting the needs of those on disability assistance who may be living on fixed incomes over their lifetime, not just for 24 months. We must meet the needs of low-income communities with a long term and sustainable initiative that establishes access as a basic service.

In April 2020, the Ministry of Education announced a \$3 million investment in public libraries with 1.8 million allocated to provide enhanced digital and connectivity services by expanding Wi-Fi capabilities, offering community digital literacy training, enhancing online library programs, purchasing technology, such as scanners, tablets, microphones and cameras.¹⁶ While this was also a welcome investment, we have heard from library workers and from CUPE BC, the union that represents them, about the strain of downloading Internet and technology access for low-income communities onto our library systems.

We must continue to increase funding and support for all public connectivity services, digital services, and access. However, the availability of very time-limited Internet access through libraries, only open during workdays and with limited hours on the weekend, does not meet the needs of communities experiencing digital inequity. When the pandemic struck, the full closure of all libraries for some time in B.C. meant thousands were left with zero Internet or technology access. Digital Justice for B.C. upholds that every British Columbian has a right to highspeed, unlimited, at-home access regardless of rightfully available publicly accessible Internet services.

Spectrum Sovereignty, UNDRIP and On-Reserve Access.

Digital Justice for B.C. supports the First Nations Technology Council's Indigenous Framework for Innovation and Technology. We know that the digital divide in B.C. is greatest for Indigenous communities, as many remain without sustainable, affordable, and equitable access to Internet connectivity. Provincial and federal investments towards connecting Indigenous communities in BC, managed by the All Nations Trust Company and totaling \$59.6 million dating back to 2009, is not sufficient to connect all 203 Indigenous communities.

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<https://www.globenewswire.com/news-release/2020/07/07/2058721/0/en/TELUS-expands-Internet-for-Good-program-to-support-British-Columbians-and-Albertans-living-with-disabilities.html>

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<https://news.gov.bc.ca/releases/2020EDUC0019-000652#:~:text=Government%20provides%20%2414%20million%20in,249%20locations%20in%20British%20Columbia.>

In its own words, the Indigenous Framework for Innovation and Technology is a roadmap for Indigenous communities, government, industry, and other members of the technology ecosystem to coordinate a comprehensive and collaborative approach to achieving digital equity, technological advancement, and economic reconciliation for Indigenous people in British Columbia. Digital Justice for B.C. seeks to work within this roadmap in solidarity and support, led by the FNTC, to ensure equitable and sustainable Internet access for all on and off reserve Indigenous communities in B.C.

Protecting and upholding access to education and health care in B.C.

The COVID-19 pandemic required the closure of all schools and higher educational facilities and all education in B.C shifted online at the height of the pandemic. This unprecedented emergency measure revealed the reality of inequitable access to both the Internet and adequate technology in a diversity of low-income communities accessing educational opportunities throughout the province. Well-intentioned school boards scrambled to distribute iPads and other technology to low-income families in need, doing all they could to ensure every child could access school online. While many children and youth were able to immediately continue accessing school, others were left with zero or fragile, intermittent access on inadequate devices despite the very best efforts of school districts throughout the province. The result was that the clock started ticking as a new deepened disparity in access to education and educational outcomes began in B.C.

During the pandemic, crucial mental health and other forms of health services shifted online. More and more access to information about health and health care delivery, including test results and outcomes, has shifted online. Telehealth and telemedicine are instrumental for health care delivery in rural and remote areas of the province. Connectivity is instrumental to accessing adequate health care and health related information in B.C.

Who would be most impacted?

All children, youth, adults, and seniors living below the Market Basket Measure regardless of age, immigration, and citizenship status; all Indigenous communities both on and off reserve; all British Columbians on fixed incomes, including those on income and disability assistance and seniors accessing the GIS and on fixed incomes; all youth in care and former youth in care; all families, adults, and seniors accessing any form of education in BC, regardless of age, immigration, and citizenship status; anyone in BC Housing or any other form of affordable or supported housing, assisted living, shelters and transition homes.