

December 6, 2013

Attn: John Lawford
Executive Director
Public Interest Advocacy Centre
ONE Nicholas Street, Suite 1204
Ottawa Ont.
K1N 7B7
lawford@piac.ca

RE: Support To Public Interest Advocacy Centre's Concerns, Charges For Wireless Calls To Canadian Help Lines And Crisis Lines

Dear Mr Lawford,

The Ending Violence Association of BC (EVA BC) is writing to support the Public Interest Advocacy Centre's concerns about crisis line and 1-800 calling through cellular phones. We share PIAC's concerns about the expenses being incurred by women in crisis using 1-800 crisis lines from their cellular phones, as well as confidentiality of crisis phone lines on cellular phone invoicing.

EVA BC coordinates and supports the work of community based anti-violence programs in BC through the provision of issue-based consultation and analysis, resource development, training, research and education. Our work is guided by respect for difference, human dignity and equality.

EVA BC is a charitable, non-profit organization that provides [services](#) to over 200 funded [anti-violence programs](#) across British Columbia including:

- Community-Based Victim Services Programs
- Stopping the Violence Counselling Programs
- Stopping the Violence Outreach Programs
- Multicultural Outreach Programs
- Sexual Assault/Woman Assault Centres

Our member programs provide counselling, advocacy, information and support services to survivors of domestic and sexual violence, child abuse and criminal harassment. There is a history of underreporting of these crimes. For example, victimization surveys

suggest that well over 90% of all sexual offences are not reported. For the general population, sexual assault is among the most under-reported crimes in Canada. These highly traumatized victims need easily accessible support and assistance to navigate getting help, including emotional support, access to medical treatment and the justice system.

To help ensure that these victims do not continue to fall through the cracks, every effort must be made to make it easier for them to obtain assistance through community programs which may be accessed via a 1-800 line. Charging victims minutes for 1-800 calls and failing to protect their confidentiality on billing documents is another disincentive for them to seek the help they need. Those that fall through the cracks are in greater danger.

Women calling in from their cell phones to get emergency assistance or to report these crimes may be in immediate danger. They may be living with their abuser and having the 1-800 call identified on the bill may result in retaliatory violence.

We are writing to support the Public Interest Advocacy Centre's concerns about crisis line and 1-800 calling through cellular phones. EVA BC shares PIAC's concerns about confidentiality, anonymity, charges, and text messaging. Women dealing with violence should be supported immediately, confidentially, and with no cost to them. We call for the following changes:

1. Increased protection of confidentiality for 1-800 number callers. When the caller dials a 1-800 number from her cell phone, this number should not appear on her bill because of her possible need for confidentiality and safety.
2. Anonymity for all callers who call anti violence programs including victim assistance, rape crisis, shelters and any other related help lines on their phones.
3. No charges for 1-800 calls from cell phones. The cost of the call is already covered by the provider of the 1-800 line and there is no reason why the caller should also be charged.
4. Text messaging is not a viable alternative to voice communication in the case of crisis and counselling support. Crisis and counselling support can only be appropriately conveyed in complex dialogue. Women accessing 1-800 lines clearly seek voice (phone) communication; and populations with limited literacy or text capacity, such as refugee, immigrant and women with disabilities, do not find text communication to be an accessible means of communication violence against women and children.

Sincerely,



Tracy Porteous
Executive Director



December 9, 2013

John Lawford
Executive Director
Public Interest Advocacy Centre
ONE Nicholas Street, Suite 1204
Ottawa, ON
K1N 7B7

Dear Mr. Lawford,

Re: charges for wireless calls to Canadian help lines and crisis lines

Family Services of Greater Vancouver offers community based victim services to adults and youth fleeing intimate partner violence. The needs of the people we serve lead us to support the elimination of charges for wireless call to Canadian help lines and crisis lines for the following reasons:

- **Poverty:**

Many of the people with whom we work fall well below the poverty line, which means many services that are available to the general public are not available to them. The individuals with whom I work are primarily women who have already left or are trying to leave an abusive relationship. For many that are able to afford cell phones, they are limited to the most basic plans available. When a woman leaves/is trying to leave an abusive relationship, she is navigating through a variety systems (e.g. seeking income assistance; seeking a space in a shelter; trying to establish connections with various community resources, including support from a crisis line). In many cases, a woman may have to access half of her monthly minutes in one phone call. Elimination of charges for wireless calls to Canadian help lines and crisis lines would open access to an important resource for women for whom poverty is a barrier to their ability to safely leave an abusive relationship/stay out of an abusive relationship.

- **Safety:** Elimination of charges for wireless calls to Canadian help lines and crisis lines would enhance safety for women leaving/trying to leave abusive relationships in two ways, as follows:

- Due to the nature of intimate partner violence, crisis lines and help lines are among the most important links women have to safety and getting help. These lines are vital as they are available 24/7 and offer connection with someone

who can walk a woman through those first steps to accessing help, information and resources. When poverty acts as a barrier, elimination of these charges would open an avenue to safety for women fleeing abuse. Many of the women with whom I have worked say they couldn't call help lines or crisis lines because they didn't have enough minutes left on their plan or couldn't afford to top up their "pay as you go" phones. In this way, the charges interfered with their safety.

- For women who are still in the relationship or have recently left the relationship, the cell phone they are using usually has been given to them by their partners and are on the partners' plans. The recording of the telephone number of a help line/crisis line associated with charges on an invoice can increase the risk to a woman's safety because this information allows her partner to determine where the woman may be and what resources she has accessed. If the elimination of charges for such calls was accompanied by elimination of the appearance of telephone numbers of crisis lines/help lines on invoices, the safety of women fleeing abuse would be enhanced.

Any questions may be directed to the following person:
Heather Whiteford, *MSW, RSW* | *Manager Victim Services*
Family Services of Greater Vancouver - 301 - 321 Sixth St. New Westminster BC V3L 3A7
604.525.9144 | 604.529.2455 (fax) | hwhiteford@fsgv.ca

Sincerely,

Catherine Statia
Community Based Victim Services
Family Services of Greater Vancouver
Richmond BC



2 Carlton Street
Suite 1404
Toronto, Ontario
M5B 1J3
Tel: (416) 977-6619
Fax: (416) 977-1227
Email: info@oaith.ca

December 4, 2013

John Lawford
Executive Director
Public Interest Advocacy Centre
ONE Nicholas Street, Suite 1204
Ottawa, ON
K1N 7B7
By email:
lawford@piac.ca

RE: Charges for wireless calls to Canadian help lines and crisis lines

Dear Mr. Lawford,

The Ontario Association of Interval & Transition Houses is a provincial coalition, founded in 1977, that works to educate and promote change in all areas that abused women and their children identify as important to their freedom from violence. Membership includes primarily first stage emergency shelters for abused women and their children, as well as some second stages housing programs and community-based women's service organizations.

Violence against women and children is endemic in Canada and across the globe. Recent research reveals that 50% of Canadian women experience at least one incidence of sexual or domestic violence in their lifetimes¹. We need to recognize that these issues affect many Canadians.

We are writing to support the Public Interest Advocacy Centre's concerns about crisis line and 1-800 calling through cellular phones. OAITH has similar concerns about confidentiality, anonymity, charges, and text messaging. Women dealing with violence and its' aftermath need to be supported immediately, confidentially, and with no cost to them. We call for the following changes:

1. Increased protection of confidentiality for 1-800 number callers. When the caller dials a 1-800 number from her cell phone, this number should not appear on her bill because of her possible need for confidentiality and safety.
2. Anonymity for all callers who call shelters for abused women, rape crisis lines, and any other related help lines on their phones.

¹ Johnson, H. (2005). Assessing the prevalence of violence against women in Canada. *Statistical Journal of the United Nations ECE* 22, 225-238

3. No charges for 1-800 calls from cell phones. The cost of the call is already covered by the provider of the 1-800 line and there is no reason why the caller should also be charged.
4. Text messaging is not a viable alternative to voice communication in the case of crisis and counselling support. Crisis and counselling support can only be appropriately conveyed in complex dialogue. Women accessing 1-800 lines clearly seek voice (phone) communication; and populations with limited literacy or text capacity, such as refugee, immigrant and women with disabilities, do not find text communication to be an accessible means of communication violence against women and children.

Please contact us if you need any further information.

Sincerely,

A handwritten signature in black ink, appearing to read 'Susan Young', with a stylized flourish at the end.

Susan H. Young
Director
susan@oath.ca
C. 647-213-0377



Ontario Coalition of
Rape Crisis Centres

Telephone: 905-299-4428
Website: www.sexualassaultsupport.ca
Email: ocrcccoordinator@hotmail.com

December 3, 2013

Attn: John Lawford
Executive Director
Public Interest Advocacy Centre
ONE Nicholas Street, Suite 1204
Ottawa, ON
K1N 7B7
lawford@piac.ca

RE: Support to Public Interest Advocacy Centre's concerns, Charges for wireless calls to Canadian help lines and crisis lines (Ontario Coalition of Rape Crisis Centres - OCRCC)

Dear Mr. Lawford,

The Ontario Coalition of Rape Crisis Centres (OCRCC) works toward the prevention and eradication of sexual assault. The Coalition recognizes that violence against women is one of the strongest indicators of prevailing societal attitudes towards women.

OCRCC is writing to support Public Interest Advocacy Centre's concerns about crisis line and 1-800 calling through cellular phones. OCRCC expresses similar concerns about the expenses incurred by women in crisis using 1-800 crisis lines on their cellular phones, as well as confidentiality of crisis phone lines on cellular phone invoicing.

The Ontario Coalition of Rape Crisis Centres has a 30-year history of working in Ontario and Canada to address sexual violence in our communities. OCRCC's membership includes sexual assault centres from across of Ontario, offering counselling, information, crisis line and support services to survivors of sexual violence. We represent approximately 80% of all sexual assault centres in Ontario. In 2007-2008 alone, Ontario rape crisis centres provided immediate response to over 39,000 crisis calls over our 24-hour lines, and over 14,000 crisis calls to office lines. Many of our Centres utilize (and refer clients to) 1-800 lines in their daily operations, aiming to advertise these important resources as safe, free and confidential.

As survivor advocates, we are aware that two out of three Canadian women have experienced sexual assault¹. Marginalized populations of women are more predominantly affected by sexual violence, and also experience more barriers – social, financial, and access – when reaching out for support². Sexual violence against women is pervasive, and has serious implications. Supportive services that are accessible, free and safe are critical to reducing the impacts of violence against women in our communities.

¹ METRAC. *Sexual Assault Statistics Sheet*. Online: <http://www.metrac.org/resources/downloads/sexual.assault.statistics.sheet.pdf>

² Wolfe and Chiodo, CAMH, 2008, in *Safe Schools Action Team Report on Gender-based Violence, Homophobia, Sexual Harassment & Inappropriate Sexual Behavior in Schools*, 2008: 3



Ontario Coalition of
Rape Crisis Centres

Telephone: 905-299-4428
Website: www.sexualassaultsupport.ca
Email: ocrcccoordinator@hotmail.com

OCRCC supports the Public Interest Advocacy Centre's concerns about crisis line and 1-800 calling through cellular phones. We ask to see the following changes:

- We ask for increased and concrete protection of confidentiality for 1-800 number callers. When the caller dials a 1-800 number from her cellular phone, this number should not appear on her bill for reasons related both confidentiality and safety
- We ask that 1-800 and other crisis line are anonymous for all callers who call rape crisis lines, woman abuse lines and related help lines
- We ask that 1-800 lines are consistently free of charge on callers' cellular phones. In fact, the cost of the call is already covered by the provider of the 1-800 line and so there is no reason why the caller ought to incur costs
- While it is an option that incurs less cost, we do not see text messaging to be a viable alternative to voice communication in the case of crisis and counselling support. While it is true that many populations of women use text to communicate overall, (1) text is not a suitable means of communication for the provision of crisis and counselling support. Crisis and counselling support can only be appropriately conveyed in complex dialogue. Women accessing 1-800 lines clearly seek voice (phone) communication; and (2) populations with limited literacy or text capacity, such as refugee, immigrant and women with disabilities, do not find text communication to be an accessible means of communication

If you have any questions or concerns, please do not hesitate to contact me at ocrcccoordinator@hotmail.com or at 905-299-4428.

OCRCC recognizes the many forms of sexual violence impacting women in Canada. We believe that education and information goes a long way toward the prevention of violence. Together, we will make a difference.

Sincerely,

Nicole Pietsch,
Coordinator,
Ontario Coalition of Rape Crisis Centres (OCRCC)