SCC File No. 38505

IN THE SUPREME COURT OF CANADA
(ON APPEAL FROM THE FEDERAL COURT OF APPEAL)

BETWEEN:

JOANNE FRASER, ALLISON PILGRIM and COLLEEN FOX

APPELLANTS
(Appellants)

- and -

ATTORNEY GENERAL OF CANADA

RESPONDENT
(Respondent)

- and -

ATTORNEY GENERAL OF ONTARIO,
ATTORNEY GENERAL OF QUÉBEC and
NATIONAL POLICE FEDERATION

INTERVENERS

FACTUM OF THE INTERVENER, NATIONAL POLICE FEDERATION

(Pursuant to Rule 42 of the *Rules of the Supreme Court of Canada*)

NELLIGAN O'BRIEN PAYNE LLP
50 O'Connor Street, Suite 300
Ottawa, ON K1P 6L2

Christopher Rootham (LSO #46225T)
Andrew Montague-Reinholdt (LSO #68239K)
Tel: 613-231-8311
Fax: 613-788-3667
christopher.rootham@nelliganlaw.ca
andrew.montague-reinholdt@nelliganlaw.ca

Counsel for the Intervener,
National Police Federation

ORIGINAL TO:

THE REGISTRAR OF THE
SUPREME COURT OF CANADA
301 Wellington Street
Ottawa, ON K1A 0J1

AND TO:

CHAMP & ASSOCIATES
45 Florence Street
Ottawa, ON K2P 0W6

Paul Champ
Bijon Roy
Tel: 613-237-4740
Fax: 613-232-2680
pchamp@champlaw.ca

Counsel for the Appellants, Joanne Fraser, Allison Pilgrim and Colleen Fox

ATTORNEY GENERAL OF CANADA
Department of Justice
National Litigation Sector
50 O'Connor Street, Suite 500
Ottawa, ON K1A 0H8

Christopher Rupar
Zoe Oxaal
Gregory Tzemanakis
Youri Tessier-Stall
Tel: 613-670-6290
Fax: 613-954-1920
christopher.rupar@justice.gc.ca

Counsel for the Respondent, Attorney General of Canada

DEPUTY ATTORNEY GENERAL OF CANADA
Department of Justice
National Litigation Sector
50 O'Connor Street, Suite 500
Ottawa, ON K1A 0H8

Robert Frater, Q.C.
Tel: 613-670-6289
Fax: 613-954-1920
rfrater@justice.gc.ca

Agent for the Respondent, Attorney General of Canada

ATTORNEY GENERAL OF QUÉBEC
Ministère de la Justice du Québec
1200, route de L'Église, 4e étage
Québec, QC G1V 4M1

Catheryne Bélanger
Tel: 418-643-1477, Ext. 23177
catheryne.belanger@justice.qc.ca

Counsel for the Intervener, Attorney General of Québec

NOËL & ASSOCIÉS
11 rue Champlain
Gatineau, QC J8X 3R1

Sylvie Labbé
Tel: 819-771-7393
Fax: 819-771-7393
s.labbe@noelassocies.com

Agent for the Intervener, Attorney General of Québec

ATTORNEY GENERAL OF ONTARIO
720 Bay Street, 4th Floor
Toronto, ON M7A 2S9

Rochelle S. Fox
Yashoda Ranganathan
Tel: 416-995-3288 / 647-637-0883
Fax: 416-326-4015
rochelle.fox@ontario.ca
yashoda.ranganathan@ontario.ca

Counsel for the Intervenor, Attorney General of Ontario

BORDEN LADNER GERVAIS LLP
100 Queen Street, Suite 1300
Ottawa, ON K1P 1J9

Karren Perron
Tel: 613-369-4795
Fax: 613-230-8842
kperron@blg.com

Agent for the Intervenor, Attorney General of Ontario

Cavalluzzo Shilton McIntyre Cornish LLP
474 Bathurst Street, Suite 300
Toronto, ON M5T 2S6

Kate A. Hughes
Janet Borowy
Danielle Bisnar
Tel: 416-964-1115
khughes@cavalluzzo.com
jborowy@cavalluzzo.com
dbisnar@cavalluzzo.com

Counsel for the Intervener, Women's Legal Education and Action Fund Inc.

GOLDBLATT PARTNERS LLP
30 Metcalfe Street, Suite 500
Ottawa, ON K1P 5L4

Colleen Bauman
Tel: 613-482-2455
Fax: 613-235-3041
cbauman@goldblattpartners.com

Agent for the Intervener, Women's Legal Education and Action Fund Inc.

Raven, Cameron, Ballantyne & Yazbeck LLP
220 Laurier Avenue West, Suite 1600
Ottawa, ON K1P 5Z9

Andrew Raven
Andrew Astritis
Morgan Rowe
Tel: 613-567-2901
Fax: 613-567-2921
araven@ravenlaw.com
aastritis@ravenlaw.com
mrowe@ravenlaw.com

Counsel for the Intervener, Public Service Alliance of Canada

TABLE OF CONTENTS

PAGE No.

PART I - Facts and Overview

1. The National Police Federation ("NPF") intervenes in support of this appeal to make two submissions. First, woman in policing suffer historical disadvantage, often linked to family related responsibilities. The NPF will itemize the modern manifestations of this historical disadvantage and explain why this historical disadvantage is relevant in this appeal and throughout the s. 15 analysis — and not, as submitted by some, irrelevant until the end of the s. 15 analysis.

2. Second, the NPF will address three legal issues raised in this appeal. The NPF will address this Court's conclusion that occupational status is not an analogous ground in s. 15 of the *Charter*, and explain why that conclusion does not apply to discrimination against part-time employees. The NPF will address the question of "total compensation" and explain why the total compensation earned by job sharers is irrelevant to this appeal and why, instead, the arbitrariness of the distinction between job sharers and RCMP members on unpaid leave is the most important consideration. Finally, the NPF will draw this Court's attention to decisions of the European Court of Justice that are relevant to this appeal.

3. The NPF takes no position on the facts of this appeal.

PART II - Issues and Position

4. The NPF's position is four-fold: that women are historically disadvantaged in policing and this historical disadvantage informs the entire s. 15 inquiry; that rules discriminating against part-time workers constitute adverse-effect discrimination on the basis of gender and not, as argued elsewhere, on the basis of occupational status; that the distinction between job sharers and RCMP members on leave without pay is arbitrary; and that European Court of Justice decisions about part-time employment are relevant to this appeal and helpful to the Appellants.

PART III - Argument

Analytic path of s. 15 of the *Charter*

5. This appeal concerns an allegation of adverse-effect discrimination. In *Taypotat*, this Court adopted a two-part inquiry into s. 15 claims based upon adverse-effect discrimination: (1) whether the law draws a distinction in its impact on the basis of an enumerated or analogous ground, and (2) whether the distinction is arbitrary, in light of, *inter alia*, the claimant's historical position of disadvantage. As set out below, though, this approach is not designed to consign historical disadvantage to a subordinate role at the end of the analysis; instead, historical disadvantage informs both elements of the s. 15 inquiry.

Historical disadvantage

a) Historical disadvantage of women in policing

6. The historical disadvantages faced by women in policing are so notorious that it is almost redundant to itemize them here. Nevertheless, it is still useful to point out the extent of that historical disadvantage and the continued pervasiveness of that disadvantage today to ensure that this claim is based upon a reality of historical disadvantage instead of stereotype and assumption.

7. Women were generally unable to become police officers until the mid-1970s. The RCMP, for example, did not accept applications from women until 1974.[1] Even those police forces that accepted women officers discriminated against them overtly, calling them "policewomen" and paying them less than their male counterparts. Courts sanctioned this differential treatment, one judge even going so far as to conclude that "*the fact of difference [in pay between male*

[1] Royal Canadian Mounted Police, *Gender-Based Assessment* (Ottawa: Royal Canadian Mounted Police National Program Evaluation Services, November 9, 2012) at p 7.

and female officers] is in accord with every rule of economics, civilization, family life and common sense."[2] The police profession has been described as "*male-dominated*"[3], "*deeply rooted in a culture of hegemonic masculinity*"[4], and full of "*[l]ingering resentment related to the full participation of women in police services*."[5]

8. Women remain under-represented as police officers (referred to in the RCMP as "regular members"):

- Women comprised roughly 20% of the RCMP's regular members in 2012.[6]
- This is similar to the representation of women within police services across Canada, which was up to only 22% as of May 15, 2018.[7]
- By contrast, women comprise approximately 71% of civilian personnel within police services generally across Canada.[8] In other words, it is the particular job — and not the industry — which is underrepresented by women.
- Male police officers earn more than their female counterparts in each rank category. "*This difference is interesting given the fact that the women in the sample are more highly educated than the men*."[9] This pay differential is partly attributable to the willingness or ability of male officers to work overtime or remain on-call.[10]

---

[2] *Beckett v City of Sault Ste Marie Police Commissioners et al*, [1968] 1 OR 633, aff'd in the result in [1968] 2 OR 653 (CA), but expressly disavowing that "*sweeping generalization.*"
[3] Stephanie Fernandes, "Women in Policing: Gender Discrimination in Yet Another Occupation" 2011(4) Footnotes 22 at p 34.
[4] Debra Langan, Carrie B Sanders & Julie Gouweloos, "Policing Women's Bodies: Pregnancy, Embodiment, and Gender Relations in Canadian Police Work", (2019) 14(4) Feminist Criminology 466 at p 468.
[5] *Strategic Human Resources Analysis of Public Policing in Canada* (2000) Ottawa: Price Waterhouse at p. 47, online: **http://www.policecouncil.ca/wp-content/uploads/2013/03/Strategic-Human-Resources-Analysis-of-Public-Policing-in-Canada-2000.pdf**.
[6] *Gender-Based Assessment*, *supra* note 1 at p 7.
[7] Patricia Conor, Jodi Robson & Sharon Marcellus, *Police resources in Canada, 2018* (Statistics Canada: October 3, 2019) at p 11, online: **https://www150.statcan.gc.ca/n1/en/pub/85-002-x/2019001/article/00015-eng.pdf?st=Kuv4Va9v**.
[8] Conor et al, *ibid* at p 12.
[9] Linda Duxbury & Christopher Higgins, *Caring For and About Those Who Serve: Work-life Conflict and Employee Well Being Within Canada's Police Departments* (Carleton University, March 2012) at p 21, online: **https://sprott.carleton.ca/wp-content/uploads/Duxbury-Higgins-Police2012_fullreport.pdf**.
[10] *Gender-Based Assessment*, *supra* note 1 at p 10. One study from the United Kingdom, for example, found that male police constables and sergeants worked 20% more overtime than their

- Female police officers become less common the higher the rank. For example, women make up 23% of constables across Canada, but only 19% of non-commissioned officers and 15% of commissioned officers.[11]

9. Women police officers are more likely to use job sharing and/or work on a part-time basis. Less than half of one percent of all police officers across Canada work part-time, but of those part-time officers fully 64% are women.[12]

b) Link between this historical disadvantage and child-rearing responsibilities

10. The link between gender and childcare responsibilities, and the impact this link has on the career progression of women, is longstanding and well-established.[13] This link is more pronounced in policing.

- Women police officers are more likely to be single than their male counterparts, and women police officers are more likely than men to report that they "*have had fewer children and not started a family because of their career*."[14]
- Women police officers who do have children spend more time per week in childcare than their male counterparts (although the difference is much less significant at the Command rank),[15] and are more likely to live in families where they have primary responsibility for childcare.[16]
- Only 1% of women police officers have partners at home full-time with children, versus 12% of male police officers whose partners are at home full-time with children.[17]

---

female colleagues (or 3.6 hours/week and 3 hours/week respectively): Secretary of State for the Home Department, *Independent Review of Police Officer and Staff Remuneration and Conditions*, *Part I Report* (London: Office of the Home Department, March 2012) at p 76.

[11] Conor *et al*, *supra* note 7 at p 11.

[12] Conor *et al*, *supra* note 7 at p 14.

[13] RS Abella, *Report of the Commission on Equality in Employment* (1984), at p 177.

[14] Duxbury & Higgins, *supra* note 9 at pp 22 and 74; Ottawa Police Service, *OPS Gender Project: Final Report* (Ottawa: Ottawa Police Service, November 2, 2017) at p 11.

[15] Duxbury & Higgins, *supra* note 14 at p 33.

[16] Duxbury & Higgins, *supra* note 14 at p 21.

[17] *Gender-Based Assessment*, *supra* note 1 at p 10; Duxbury & Higgins, *supra* note 14 at p 21.

11. In other words, women in policing are particularly prone to the fact that "*[e]mployers continue to demand an 'unencumbered worker' [and] the right to organize work without regard to workers' care obligations.*" Even when there are alternatives to the unencumbered worker, these "*strategies – euphemistically labelled 'choices' – often include part-time and precarious forms of work that typically come with lower wages, fewer benefits, fewer promotional opportunities, and minimal or no retirement pensions*."[18]

c) Historical disadvantage is important

12. Job sharing arrangements like the one at issue in this appeal are a commonly-recommended response to the under-representation of women in policing as a result of disproportionate childcare responsibilities.[19] The issue in this appeal is whether denying police officers who participate in job sharing arrangements the ability to participate fully in the RCMP's pension plan exacerbates — instead of ameliorates — the adverse impact of the unequal burden of family care on women.

13. The Attorney General of Ontario is particularly critical of the Appellants for addressing historical disadvantage immediately, instead of only considering it at the final stage of the s. 15 analysis. With respect, this criticism is misplaced. Historical disadvantage, stereotypes, and unconscious biases are always relevant to ensure a "*flexible and contextual inquiry*"[20] into s. 15 of the *Charter*.

14. The historical disadvantage faced by women in policing is particularly important in this case because it discloses the discriminatory impact of the job sharing program at issue. Job sharing is a worthy program that encourages women to remain in policing. It also encourages women

---

[18] Elizabeth Shilton, "Family Status Discrimination: 'Disruption and Great Mischief' or Bridge over the Work-Family Divide?" (2018), 14 JL & Equal 33 at p 34.
[19] Tim Prenzler & Georgina Sinclair, "The Status of Women Police Officers: An International Review" (2013) 41:2 Intl J of Law, Crime & Justice 115 at p 118; Tara Denham, *Police Reform and Gender* (Geneva: Geneva Centre for the Democratic Control of Armed Forces & United Nations International Research and Training Institute for the Advancement of Women & Office for Democratic Institutions and Human Rights, 2008), online: **https://www.un.org/ruleoflaw/files/GPS-TK-PoliceReform.pdf**.
[20] *Quebec (Attorney General) v A*, 2013 SCC 5 at para 331.

to remain connected to the RCMP workforce after having children, making it more likely that they will return to full-time work with the RCMP in the future and making them better trained and equipped in modern police techniques when they return full-time.

15. The negative impact on pensions chills the positive impact of the job sharing program by deterring RCMP members from participating. Given a choice between two options of no pay but a secure pension, on the one hand, and some pay but less pension security, on the other, employees will pick pension security over short-term income.[21] Put bluntly: job sharing will not encourage or facilitate women police officers returning to the workplace if there is any risk of lower pensions as a result.

Legal Issues Pertaining to Adverse Effect Discrimination

a) Relationship between adverse effect discrimination on the basis of gender and discrimination on the basis of occupational status – the part-time worker

16. The NPF acknowledges that occupational status is not an analogous ground in s. 15 of the *Charter*. It is not a breach of s. 15 of the *Charter* to, for example, treat police officers differently as a class than other employees. Part-time employment status, however, is not the type of occupational status this Court contemplated when earlier rejecting occupational status as an analogous ground.

17. At paragraph 50 of its factum, the Respondent submits that this Court's decision in *Baier v Alberta* stands for the proposition that the status of being a part-time employee is not a recognized or analogous ground under s. 15. That is not the Court's finding in *Baier*. The issue in *Baier* was that school board employees were not permitted to run for elected office for other school boards, but municipal employees were permitted to run for municipal office. The Appellant in that case argued that occupational status — *i.e.* the particular job or profession held by an employee — was an analogous ground. This Court held that it was not. *Baier*,

[21] Derek Dobson, "Designing retirement schemes Canadians want: observations from a Modern DB Pension Plan" (Paper Delivered at the CPPLC Pension Forum: A National Discussion on Public Pension Issues, Toronto, April 13, 2017 [unpublished] at pp 3–4.

therefore, was a claim of direct discrimination on the basis of occupational status; it did not consider, in any respects, a claim of adverse effect discrimination based on the enumerated ground of sex or the analogous ground of family status.

18. The intervenor Attorney General of Ontario points out that this Court rejected the application of s. 15 of the *Charter* to health care workers as an occupational group in *BC Health Services*. The Court in that case — as in *Baier* — concluded that s. 15 of the *Charter* does not protect against distinctions drawn on the basis of the "*type of work [employees] do.*"[22] As with *Baier*, though, this Court was addressing a claim based on occupational status in the sense of a particular job or profession, and did not address the distinction between part-time and full-time employment.

19. The NPF agrees with the Attorney General of Ontario's submission at paragraph 12 of its factum that a particular demographic composition of a workplace does not, without more, trigger the application of s. 15 of the *Charter*. However, the distinction between part-time and full-time employees generally, or between job sharers and full-time RCMP members specifically, is not simply a question of demographic statistics. Women comprise the predominant share of part-time employees more generally because of a social construct insisting that women be disproportionately responsible for family responsibilities, including child-care; women comprise the predominant share of job sharers in the RCMP because this social construct remains particularly prevalent in policing. The nexus between gender or family status and the adverse treatment of part-time employee or job sharers is not merely statistical; the nexus is the social construct of disproportionate family care responsibilities. The statistics merely demonstrate that this social construct continues to exist.

b) "Total compensation"

20. At paragraphs 49–50 of its decision, the Federal Court of Appeal denied the Appellants' appeal because there was no evidence that the total compensation package provided to job sharers was less than that provided to RCMP members on care and nurturing leave without pay. In fact,

---

[22] *Health Services and Support - Facilities Subsector Bargaining Assn v British Columbia*, 2007 SCC 27 at para 165.

the opposite is almost certainly true: job sharers who are paid for their work earn more than RCMP members on leave without pay because partial salary is greater than no salary. This reflects the fact those members are actually working.

21. In some respect, the Federal Court of Appeal is referring to the principle of *pro rata temporis*. Part-time workers, by definition, work fewer hours than their full-time counterparts. If they receive less per hour than a full-time employee, this is clearly discriminatory treatment. If they receive exactly the same hourly rate but — because, for example, they work 20 hours a week rather than 40 — they earn less in total earnings, this reduction in earnings *pro rata temporis* is justified and not discriminatory.

22. The principle of *pro rata temporis* is not raised in this appeal and, with respect, the Federal Court of Appeal misses the point of the Appellants' claim. Job sharers are not asking for employer-paid pension benefits as if they were working full-time; they are asking for the right to pay for their pension — *i.e.* to be treated as if they were not working for the time period during which they were not working. The Appellants address this aspect of the Federal Court of Appeal's decision at paragraphs 54–61 of their factum. While the NPF agrees with the Appellants' conclusion, it reaches that outcome on a different basis. The NPF's main point is that the decision to deny job sharers the ability to participate fully in the pension plan is arbitrary.

23. This Court's decision in *Taypotat* properly focussed the s. 15 inquiry on arbitrary distinctions.[23] The NPF leaves it for this Court to decide whether this focus on arbitrary distinctions is a new test for discrimination whereby the arbitrariness of the law is proof of discrimination on its own[24] or, alternatively, whether the arbitrariness of a law is a strong signal that the law is based upon stereotype, unconscious bias, or pre-existing disadvantage. Regardless, the Respondent has provided no practical explanation for why RCMP members on unpaid care and nurturing leave can "buy back" their pension but RCMP members who are job sharing cannot "buy back" a full pension. This rule is not required for some arcane, actuarially-based pension rule — otherwise, the *Income Tax Act* and *Income Tax Regulations* would not expressly permit full-

[23] *Kaykewistahaw First Nation v Taypotat*, 2015 SCC 30 at paras 18, 20.
[24] As suggested in Alicja Puchta, "*Quebec v A* and *Taypotat*: Unpacking the Supreme Court's Latest Decisions on Section 15 of the Charter" (2018), 55 Osgoode Hall LJ 665 at 690.

time buyback by employees on temporarily reduced hours.[25] The rule does not encourage job sharing — but, rather discourages it. The rule does not save the employer any money — as the Appellants would pay the employer's share of the additional cost of their pension. The explanation for this rule remains elusive.

24. It is the arbitrariness of the distinction in pension rules between RCMP members on unpaid care and nurturing leave and those engaged in job sharing that makes, or at least strongly indicates that, the distinction is discriminatory. The fact that job sharers earn more in total compensation than RCMP members on unpaid leave is neither surprising nor relevant.

c) European Court of Justice and part-time work

25. The European Court of Justice has concluded that rules disadvantaging part-time employees[26] and public servants engaged in job sharing[27] are a form of adverse-effect discrimination on the basis of gender.

26. To that end, the European Union has adopted a Directive prohibiting discrimination between part-time and full-time workers unless the less favourable treatment can be objectively justified. Prohibited forms of less favourable treatment include differences in the accumulation of pensionable service between part-time and full-time workers.[28]

27. In the case of *Bruno* cited above, for example, the employees were cabin crew members employed by the airline Alitalia. They worked in accordance with what was referred to as a "vertically-cyclical part-time" arrangement. This meant that they only worked during certain weeks or months during the year — an arrangement almost identical to the situation of the Appellant Pilgrim in this appeal. The relevant pension rules only took into account the periods worked, to the exclusion of the weeks not worked, for the purpose of acquiring pension rights. In other words, the length of pensionable service was reduced. Part-time employees had the

---

[25] Federal Court Decision, para 26.
[26] *Bilka-Kaufhaus GmbH v Karin Weber von Hartz*, [1986] ECR 1607; *Magorrian v Eastern Health and Social Service Board*, [1998] ECR I-7153.
[27] *Hill v Revenue Commissioners*, [1998] ECR I-3739.
[28] *INPS v Bruno*, [2010] 3 CMLR 45.

right to purchase pension credits on a voluntary basis. Despite that right (which is the relief sought by the Appellant in this case), the European Court of Justice still concluded that the rule discriminated against part-time employees and that European Union law does not permit differential treatment of a worker's length of service for pension purposes.

28. The NPF appreciates that this Court is not bound by European Court of Justice decisions. However, the consensus in Europe that discrimination on the basis of part-time employment is gender discrimination, and the specific conclusion that even pensions are subject to this principle, buttresses the soundness of the Appellants' submissions on these two points.

PART IV - Costs

29. The NPF does not seek costs and asks that costs not be awarded against it.

PART V - Oral Argument

30. The NPF requests permission to present oral argument not exceeding five (5) minutes at the hearing of this matter.

ALL OF WHICH IS RESPECTFULLY SUBMITTED.

Date: November 22, 2019

Christopher Rootham
Counsel for the Intervener, National Police Federation

Andrew Montague-Reinholdt

PART VI - Table of Authorities

Canadian Cases	**Paragraph(s) referred to in Factum**
Beckett v City of Sault Ste Marie Police Commissioners et al, [1968] 1 OR 633, aff'd [1968] 2 OR 653 (CA)	7
Health Services and Support - Facilities Subsector Bargaining Assn v British Columbia, 2007 SCC 27	18
Kaykewistahaw First Nation v Taypotat, 2015 SCC 30	23
Quebec (Attorney General) v A, 2013 SCC 5	13
European Cases	
Bilka-Kaufhaus GmbH v Karin Weber von Hartz, [1986] ECR 1607	25
Hill v Revenue Commissioners, [1998] ECR I-3739	25
INPS v Bruno, [2010] 3 CMLR 45	26
Magorrian v Eastern Health and Social Service Board, [1998] ECR I-7153	25
Secondary Sources	
Alicja Puchta, "*Quebec v A* and *Taypotat*: Unpacking the Supreme Court's Latest Decisions on Section 15 of the Charter" (2018), 55 Osgoode Hall LJ 665	23
Debra Langan, Carrie B Sanders & Julie Gouweloos, "Policing Women's Bodies: Pregnancy, Embodiment, and Gender Relations in Canadian Police Work", (2019) 14(4) Feminist Criminology 466	7
Derek Dobson, "Designing retirement schemes Canadians want: observations from a Modern DB Pension Plan" (Paper Delivered at the CPPLC Pension Forum: A National Discussion on Public Pension Issues, Toronto, April 13, 2017 [unpublished]	15
Elizabeth Shilton, "Family Status Discrimination: 'Disruption and Great Mischief' or Bridge over the Work-Family Divide?" (2018), 14 JL & Equal 33	11

Secondary Sources (continued)	
Linda Duxbury & Christopher Higgins, *Caring For and About Those Who Serve: Work-life Conflict and Employee Well Being Within Canada's Police Departments* (Carleton University, March 2012) at p 21, online: **https://sprott.carleton.ca/wp-content/uploads/Duxbury-Higgins-Police2012_fullreport.pdf**	8, 10
Ottawa Police Service, *OPS Gender Project: Final Report* (Ottawa: Ottawa Police Service, November 2, 2017)	10
Patricia Conor, Jodi Robson & Sharon Marcellus, *Police resources in Canada, 2018* (Statistics Canada: October 3, 2019) at p 11, online: **https://www150.statcan.gc.ca/n1/en/pub/85-002-x/2019001/article/00015-eng.pdf?st=Kuv4Va9v**	8, 9
RS Abella, Report of the Commission on Equality in Employment (1984)	10
Royal Canadian Mounted Police, *Gender-Based Assessment* (Ottawa: Royal Canadian Mounted Police National Program Evaluation Services, November 9, 2012)	7, 8, 10
Secretary of State for the Home Department, *Independent Review of Police Officer and Staff Remuneration and Conditions*, *Part I Report* (London: Office of the Home Department, March 2012)	8
Stephanie Fernandes, "Women in Policing: Gender Discrimination in Yet Another Occupation" 2011(4) Footnotes 22	7
Strategic Human Resources Analysis of Public Policing in Canada (2000) Ottawa: Price Waterhouse at p 47, online: **http://www.policecouncil.ca/wp-content/uploads/2013/03/Strategic-Human-Resources-Analysis-of-Public-Policing-in-Canada-2000.pdf**	7
Tim Prenzler & Georgina Sinclair, "The Status of Women Police Officers: An International Review" (2013) 41:2 Intl J of Law, Crime & Justice 115 at p 118; Tara Denham, *Police Reform and Gender* (Geneva: Geneva Centre for the Democratic Control of Armed Forces & United Nations International Research and Training Institute for the Advancement of Women & Office for Democratic Institutions and Human Rights, 2008), online: **https://www.un.org/ruleoflaw/files/GPS-TK-PoliceReform.pdf**	12