SUBMISSIONS TO - Special House of Commons Committee
on
Visible Minorities

FROM - Canadian Civil Liberties Association

DELEGATION A. Alan Borovoy
(General Counsel
Shin Imai
(Research Associate)

Toronto October 19, 1983

C O N T E N T S

Introduction

The Canadian Civil Liberties Association is a national organization with a cross-country membership of more than 5500 individuals, nine affiliated chapters, and some 30 groups which themselves represent several thousands of additional people. The membership is drawn from a wide variety of callings and interests - lawyers, business proprietors, trade unionists, minority group leaders, homemakers, journalists, media performers, writers, etc.

Among the objectives of our organization is the promotion of the freedom and dignity of the individual. It is not difficult to appreciate the relationship between this objective and the mandate of this Committee. Racial discrimination represents a substantial affront to human freedom and dignity. Indeed, in this century alone, racism has been responsible for some of the worst atrocities which have ever been committed against the human person. While we must be grateful that race relations in contemporary Canada bear little resemblance to some of these developments in other places, it remains the better part of wisdom for Canadians to be vigilant. No society is safe from the disease of racism. Moreover, this country in particular has experienced some disquieting strains in recent years.

For all of these reasons, the Canadian Civil Liberties Association welcomes the work of this Committee. Despite many governmental efforts, Canada continues to harbour a number of serious racial injustices. The brief which follows represents the attempt of our organization to propose concrete measures to deal with these unacceptable improprieties.

The Goals of Governmental Effort

The race relations efforts of government often founder in a sea of confused goals and uncertain objectives. It would be useful, therefore, to begin our remarks by attempting to articulate what ought to be the primary goals of governmental effort in this difficult area of human relations.

In our view, governments should aim primarily, not at universal love, but at fair play. We need not require employers, for example, to like blacks, Asians, or native people; we must insist that employers hire the qualified members of these groups whether they like them or not. Our primary concern should be not with what people like but with what they do, not with how they feel but with how they behave.

Of course, this is not to be taken as opposition to brotherly love. It is simply an unwillingness to wait for the millennium. As the late John Maynard Keynes once observed, "in the long run, we are all dead". A strategy addressed to human beings must deal,at least in part, therefore, with the era in which they live - the short run. The goals of universal love are beside the point. On the one hand, they are unnecessary. On the other hand, the quest for them is likely to be counterproductive.

History has made it clear that people can be quite fair in their behaviour without being lofty in their attitdues. Montgomery, Alabama racially integrated its bus company during the 1950's, not because of Christian love for its black citizens, but rather because of an economic boycott which those black citizens had organized. The history of the struggle against racial injustice overflows with similar examples. Sit-ins, wade-ins, pray-ins, freedom rides, court judgments, civil rights statutes - in the wake of these developments, the old American South became effectively desegregated. We are aware of no serious claim that love was the essential ingredient in the desegregation process. Our argument in this respect was probably best expressed by the legendary American activist, the late Saul Alinsky. He declared that, in the real world, most people who do the right thing do so for the wrong reasons. Government has at its disposal a number of levers through which it can improve human behaviour. It lacks a comparable capacity to improve human psyches.

Conversely, the quest for love and bliss has often proved obstructive. Toronto Sun editor Barbara Amiel has argued, for example, that, by attempting to inflict pressure on discriminatory employers, the law might create racism where previously it had not existed. It is true, of course, that there are situations where employers exclude racial minorities, not out of personal hostility, but for various business reasons. They might be attempting merely to accommodate prejudiced customers and employees. Ms Amiel's reluctance to exert pressure on these employers is an outgrowth of her misconceived focus. It is because she attaches greater weight to the racist attitudes of the employers than to their discriminatory behaviour.

As a matter of priorities, government efforts should focus on the racial issues which are most serious. In our view, the repugnant pronouncements of the racial extremists do not fall into this category. Fortunately, these dubious elements have failed for years to make a dent on the mainstream of our community. This is not to suggest, of course, that they should be ignored. But it is to suggest that our response to them should be grounded in a sound sense of proportion. At this point in our history, the clout and size of these groups do not merit a priority response.

In our view, the serious racial problems in this country concern the special hardships faced by minority groups in their attempt to enjoy the fruits of public life. We refer to what non-white people experience at the hands of employers, landlords, proprietors, licensing authorities, and the various departments of government. It is in these areas that the most serious racial problems exist. Government priorities should reflect this recognition.

Many of these concerns, of course, are the subject of our human rights statutes at both the federal and provincial levels. The Canadian Civil Liberties Association believes that these statutes and their administrative agencies, the human rights commissions, should receive greater support from all levels of government. It is also our view, however, that, while these statutory instruments are necessary, they are not sufficient. There are racial injustices in the public arenas of this country which cannot be adequately handled with the existing legal machinery. The bulk of our ensuing commentary is addressed to what must be done beyond what is now being done.

Structural Inequities

In the late 1970's, the Canadian Civil Liberties Association conducted a number of surveys relating to the employment of non-whites in both the corporate and public sectors of Canadian society. Here are some of the findings.

- A survey of a municipal fire department in a city with a large non-white population, disclosed that, of more than 1100 fire fighters, there were only two non-whites.
- In a survey of two medium-sized cities which had large non-white populations, it was found that there was only one non-white police officer in one of the places and none in the other.
- A survey of the Financial Post magazine for an entire year disclosed that, of 1913 promotions and appointments to corporate positions which were publicized with photographs, no more than six were awarded to non-white people.
- Despite a relatively high proportion of native people living in three northern communities, a survey of more than 500 bank positions in those communities found that only two were occupied by native people and one of them was part time.

Evidence of this kind cannot support a charge of racial discrimination against identifiable parties. But, in view of our growing non-white population, it would be difficult to believe that such discrimination was not a factor at least in some of these cases. Perhaps, in some cases, outmoded recruitment and promotion practices retarded the advancement of non-whites? This appeared to be the case, for example, in the above mentioned fire department. Available jobs there had never been publicly posted. Instead, prospective recruits would simply send their applications to the personnel department and, when new vacancies occurred, the applicants on file for the longest time would be invited for interviews. Because of the small turnover in the department and the lengthy list of applications, this system resulted in a de facto lockout of recent immigrants.

Perhaps the situation has been influenced also by inertia? Like a lot of others, many of these employers may be highly parochial; it might never occur to them to look beyond their favourite haunts in their search for qualified personnel. And, in many cases, non-whites themselves probably hesitate to apply for

certain positions in the belief that they will encounter discrimination. Even in those cases where such beliefs are wrong, they are often understandable. If in certain places there has been nothing but a sea of white faces for generations, it is quite reasonable to suspect discrimination.

Whatever the causes, the results are unhealthy. The existence of lily white enclaves anywhere in our economy tends to exacerbate parochialism there and distrust everywhere else. The institutions themselves are deprived of vital perspectives. Our non-white minorities experience the confirmation of whatever anxieties they may have felt about their marketplace mobility. And the public at large is led to believe that the phenomenon of racism is effectively intractable. Together, these factors help to sustain and expand the corrosive impact of racial indignity.

It has been obvious for some time that the traditional methods of human rights law enforcement - the complaint-centred approach - will not suffice to alter these structural inequities. Complaint enforcement depends upon the coincidence that an aggrieved person and an available job will be suited to one another. The number of such coincidences is not likely to be great enough to make a significant dent in these entrenched patterns. In any event, this approach does nothing about the people who never get to file complaints either because they never hear about the available jobs or because they are too intimidated to seek them even if they do hear about them. Moreover, in the case of certain groups, the problems are not sufficiently amenable to redress by complaint. In this connection, consider the scandalous under-employment of the native people. Even if racial discrimination were to disappear overnight, very little of this problem would be relieved. Historical disparities between Indians and non-Indians in education, training, health services, and acculturation would inflict upon many Indians severe disadvantages in their attempts to obtain employment on the open market.

No doubt, these are the realizations that gave rise to the concept of affirmative action - the development of initiatives designed to increase the participation of disadvantaged groups in various sectors of the economy. Under this approach, our human rights commissions would not simply respond to the filing of complaints;

they would also initiate action in order affirmatively to expand opportunity. For all of the reasons indicated above, we should welcome the prospect of our commissions getting off their formal jurisdictions and becoming more aggressive about the breaking of racial barriers.

In this connection, the Canadian Civil Liberties Association recommends that the relevant statutes be amended to include a provision for contract compliance. Every year, governments in this country award scores of contracts which produce millions of public dollars for the private sector. In our view, the law should require that, as a condition of obtaining government contracts, private sector employers must undertake certain affirmative initiatives to broaden the participation of disadvantaged non-whites in their business operations.

Such affirmative initiatives would entail special efforts by the employers to encourage non-whites to apply for available jobs. The employers might be required, for example, to advertise in the non-white press and to insert human rights statements in their general advertisements. They might also approach the leaders of minority groups to recruit suitable candidates for available positions.

In certain situations, employer representatives should visit some of the places where there are large numbers of such disadvantaged non-whites. Employers who are awarded contracts at or near Indian reserves, for example, should arrange to visit the reserves and nearby friendship centres in order to create an interest in available job opportunities. Imagine, for example, what kind of impact would be created on the long-suffering and neglected people of the White Dog Indian Reserve if the personnel manager of a Kenora groceteria attended one of their Band meetings to request that candidates come forward for jobs in the store. There should also be an adequate number of government subsidy programs to provide on-the-job training for those whose educational background may be deficient, and there should be an obligation for employers under government contract to use such subsidies at least in a reasonable number of cases.

Special subsidies should also be made available as an incentive for some of the non-white organizations to intensify the recruitment effort. Employers often pay a fee to private employment agencies whose recruitment efforts produce suitable candidates. Why not pay a similar fee to some of the non-white organizations for the performance of such services? There is a well established precedent in this country for providing government grants to a wide range of organizations in the voluntary sector. It would be hard to conceive of a more constructive outlet for such grant giving than the one advanced here.

These affirmative initiatives need not involve any suggestion of reverse discrimination or quotas. We are not asking that qualified whites necessarily be rejected in favour of unqualified non-whites. What we are suggesting is essentially twofold:

1. more disadvantaged non-whites should be encouraged and assisted to qualify and to compete
2. employers under government contract should be required to broaden the traditional sources of recruitment and promotion.

An underlying assumption of this strategy is that once a greater number of non-white people began to apply for a greater number of available positions, parochial patterns would be increasingly imperilled. In the very process of attracting so many non-white candidates, the employers would be creating a pool of potential complainants in the event that there were no apparent change in their hiring practices. The mere knowledge of this additional scrutiny would also serve to inhibit any impulses toward deliberate discrimination. In the real world, all this could represent real progress.

The human rights commissions should undertake to monitor employer compliance with these affirmative initiatives. Where there is evidence of non-compliance, the commissions should attempt, as in other cases, to effect compliance through conciliation. If that were to fail, there should be recourse to an independent board of inquiry which would be mandated to conduct a full and fair hearing. If such a hearing were to confirm the finding of non-compliance, the board should be able to order, where appropriate, a termination of the contract, subsequent compliance, and/or monetary damages.

At least where private sector employers are concerned, this concept of contract compliance would introduce some effective incentives and sanctions. The community could anticipate at long last, therefore, some meaningful efforts to increase the participation of racial minorities in those sectors of the economy where they have been so grossly under-involved. We believe it is only fair to exact higher standards of public performance from those who are reaping a substantial measure of public benefit.

As far as public sector employers are concerned, contract compliance obviously would not apply. To deal with this problem, our human rights statutes should empower the commissions to investigate the state of such affirmative initiatives throughout the various levels of government and the Crown corporations. Where a commission believes it finds such measures wanting, it should make the appropriate recommendations to the governmental body in charge. To whatever extent there were a failure to correct such deficiencies within a reasonable period, the commissions should be mandated to submit their findings in reports to Parliament or the provincial legislature concerned. The statute should require at least one annual report on the efforts of the commissions in this area. We believe that the adoption of such a procedure would be likely to provide the public sector with a substantial political incentive to improve its employment performance of racial minorities.

As an important first step, we call upon this Committee to recommend the adoption of these measures at the federal level. The existence of such an example emanating from Ottawa would go a long way toward promoting similar initiatives at the provincial level.

Recommendation No. 1

> Legislation should be enacted providing for contract compliance. As a condition of obtaining government contracts, private sector employers should be required to undertake a number of specific initiatives which are designed to broaden the participation of non-white minorities in their business operations. Non-compliance should render such employers subject to the termination of their contract benefits, mandatory compliance orders, and/or monetary damages.

Recommendation No. 2

The Canadian Human Rights Commission should be required to promote such initiatives in the federal public service and among federal Crown corporations in the following ways:

a) periodic investigation and review of employment practices in the public sector
b) recommendations to the relevant ministers and Crown corporation heads
c) progress reports to Parliament.

Institutional Rigidity

A key cause of racial inequity is the failure of our various institutions to adapt their policies and procedures to the needs of the various groups in the community.

Consider some of the special problems facing immigrants who wish to practice their professions and trades in this country. A case history will illustrate the problem. From the late 1970's until the early 1980's, our organization took up the case of an East Indian professional who had graduated from the University of Kerala. Along with a number of colleagues from India and Pakistan, this man could not obtain a licence to practice in the province where he lived. Indeed, he could not even get permission to write the qualifying examination for foreign graduates. The trouble was that the licensing authorities did not recognize the University of Kerala or, for that matter, any other school in almost the entire Third World. Somehow the recognition lists included all kinds of schools in the United States, the United Kingdom, Europe, South Africa, Australia, and New Zealand. But very few schools in the non-white countries.

After prolonged attempts to determine what was missing in the applicant's basic education at the University of Kerala, it finally emerged that the Canadian authorities did not recognize that school because they had never carried out an on-site inspection there. And why not? Because, at one point in the 1960's, it was decided that the cost of inspecting foreign schools was prohibitive. In future, therefore, no such foreign inspections would be made unless the foreign schools themselves requested and paid for it. This, of course, was tantamount to saying that these Third World graduates could never hope to have their qualifications recognized here. Why would their schools be willing to pay for such an inspection of their facilities? It would hardly serve their interests.

Somehow, the authorities here had managed to initiate and subsidize the inspection of foreign schools throughout the white Western world. Somehow that generosity abated when this country began to receive a heavy influx of immigrants from the non-white Third World. Understandably, therefore, these circumstances created a perception of discrimination. But, even if discrimination was not the intent, it was often the result. In many cases, immigrants from white and non-white countries were subjected to substantially different treatment in their efforts to practice their vocations in this country.

At the very least, the licensing body was guilty of unwarranted rigidity. It simply refused to adopt policies which would accommodate the needs of our changing population. Why couldn't arrangements have been made such as those in the United States where examinations and supervised internship programs were developed to determine the qualifications of foreign graduates?

Of course, some of these reforms finally were made here. But it took several years of badgering by the Canadian Civil Liberties Association and ultimately an effort from a provincial human rights commission. Until those groups got into the picture, institutional rigidity frustrated the legitimate aspirations of these Asian immigrants.

Even though the policies of most licensing bodies fall within the provincial jurisdiction there is an important federal interest in this matter. The determination and application of immigration policy falls largely within the federal jurisdiction. To whatever extent the conduct of licensing bodies creates unfair hardship for our immigrant population, it undermines the integrity of the federal immigration program. In consequence, we believe that the federal government should review the policies and practices of licensing agencies throughout the country with a view to determining their impact on our various immigrant communities. Where comparable inequities are found, federal action should result. At the very least, the federal government should make representations to the affected provincial governments to change whatever policies are causing the unfair hardships. Such an approach has many precedents. Just recently, for example, we saw provincial Attorneys General campaigning to change the federal security legislation. There is no reason why political pressure can't be exerted the other way around. Indeed, within the last few days, there was a House of Commons resolution with respect to language rights in Manitoba. The issue of race relations is no less central to the viability of the whole body politic than language rights and security intelligence.

Recommendation No. 3

The federal government should undertake a review of licensing practices throughout the country. To whatever extent such review uncovered unfairness to our immigrant population, the federal government should call upon the affected provincial governments to make the appropriate changes.

Institutional rigidity has hurt not only those who have been here the least amount of time (the immigrants) but also those who have been here the longest (the native people). Consider this case. During the month of August a few years ago, an Indian man was intentionally pushed from a moving train. In the result, he suffered brain damage, a semi paralyzed arm, and an amputated leg. Yet he received no legal assistance for more than seven months. In mid March of the following year, a field worker employed by the Canadian Civil Liberties Association discovered this man virtually vegetating in a northwest Ontario hospital. Our staff representative informed the man and his family about the Criminal Injuries Compensation Board of Ontario and assisted them in preparing and filing the requisite application. Shortly thereafter, he appeared on the man's behalf before a hearing of the Board. In the result, the hapless Indian was awarded monthly compensation for the rest of his life.

Why was nothing done about this case for as long as seven months? Neither the hospital authorities nor the Department of Indian Affairs nor the Ontario Legal Aid Plan nor anyone else as far as we know provided or even offered any legal assistance. It took the coincidence of a visit from the Canadian Civil Liberties Association, an organization that operates entirely without government money. If it had not been for that coincidence, might that man still be languishing without compensation? Our experience in the north country impels us to believe that this was a distinct possibility.

Apparently, the new legal aid clinics have also experienced the same phenomenon. In 1981, for example, a clinic in northern Ontario investigated the case of an 80 year-old native woman. Her health was impaired by failing eyesight and mobility problems. The daughter with whom she lived had a severe case of arthritis. Since neither was able to work, their financial situation was desperate. Upon investigation, the clinic discovered that the old woman had been eligible for a veteran's affairs pension since the early 1970's. During all that time, she was apparently unaware of her legal claim. When the matter was raised with the department, regular pension cheques were soon forthcoming. In addition, the woman received a retroactive payment of more than $4000.

Recently, another clinic discovered that numbers of native people had not been filing their income tax returns. In their case, this proved to be a financial disadvantage. Since so many of these people did not earn enough money to have a taxable income,

it was possible that they could receive money in the form of tax credits from the federal government. Until the advent of the clinic, so many of these native people simply did not know of the existence of such entitlements. In one of these cases, the clinic was able to obtain more than $900 for a native person who had not even filed a return.

Obviously, these are not isolated incidents. CCLA staff representatives and legal aid clinics have had this experience time and again. On so many occasions when these advocates have gone into a northern native community, they have found numbers of native people who had unfulfilled but valid legal claims. And so often, follow-up action has produced sizeable sums of money to the people concerned - unemployment insurance, pensions, workmen's compensation, employment standards benefits, tax credits, etc. Unfortunately, large numbers of native communities are not subject to regular visits by such advocacy services. We can only believe, therefore, that many, many native people in this country are not receiving the minimum benefits to which they are entitled under the laws of this country.

Of course, if these native people on their own were to apply for legal aid or file claims under the relevant statutes, there is a good chance that they would obtain the benefits. But to apply for such assistance is first to recognize that you may be entitled to it. Unfortunately, large numbers of the native people in the northern regions are simply not aware of their rights and remedies. They are not familiar or comfortable with our customs and institutions. There is also a lack of fluency in our two official languages. And there is a wide-spread attitude of resignation to the mistreatment they suffer.

Moreover, sheer physical distance frustrates the realization of Indian legal rights. So many of these people live far away from the places where service can be obtained. Even if they are entitled to legal aid, for example, how are they supposed to obtain it when they live long distances from a lawyer or a clinic? In many of these regions, there is no low cost public transportation. Apart from inadequate telephone communication, the only practical alternative often is to hire a taxi at a rather substantial cost. There have even been situations where impoverished native people have been obliged to pay taxi fares in order to comply with their legal obligations to appear in court.

Indeed, in some regions, the available courts are located so far away that native people have simply surrendered whatever legal rights they may have had. In one area, for example, the closest small claims court is more than 150 miles from where the native people live. Since there are no roads in between, the trip would require spending all day on a train or more than $50 on a plane. Because of transportation schedules, it would be necessary also to stay two nights in the town where the court is located. This would add room and board costs to the heavy transportation expense. Despite the fact that some of these native people have been advised that they had valid defences to lawsuits which had been launched against them, they have felt that they would be better off to pay the claims than to incur the costs and inconvenience of the trip to court.

While it is true, of course, that there are non Indians who encounter similar problems, few people, but the Indians, suffer such a combination of impediments - logistical, financial, cultural, and administrative. By now, it should be obvious that the inequality of the native people will not be significantly reduced through the mere enactment of greater legal rights and statutory benefits. Considerable attention must be paid to the question of delivering the rights and benefits at issue. Where remote-based native people are concerned, how are they to be informed of their entitlements? What combination of oral and written material is needed and in what languages? How are they to be encouraged to take advantage of what the law has provided for them? And how can they be helped to overcome the hardships of distance? What combination should there be of travel vouchers, low cost transportation, toll free telephones, and decentralization of facilities?

In fairness, it must be recognized that some movement has been made in these directions. But not nearly enough to provide remote-based native people a semblance of equality with their white counterparts in the urban centres. Unfortunately, the institutions of our society have revealed too little of the flexibility that is required for a pluralistic society.

The statutory benefits at issue lie in both the federal and provincial domains. But the federal government has a special constitutional responsibility for the Indian people. On this basis, we would call for a federal initiative - the provision

of funds to inform native people of their rights and to overcome the logistical hurdles in exercising them. Conceivably, such a responsibility may already be considered within the mandate of the Department of Indian Affairs. Perhaps, however, a greater variety of initiatives might be undertaken. Perhaps special subsidies might be given to local legal aid clinics and friendship centres which would undertake to provide some of the services that are needed. Perhaps also there might be subsidies for the training of lay advocates from among the Indian people living on particular reserves. Inevitably, greater experimentation will produce a greater refinement of approach. The point to make here, however, is that greater insitutional flexibility must become a key goal of the federal initiative.

Recommendation No. 4

The federal government should allocate sufficient resources in order more effectively
a) to inform our native people of their legal rights and
b) to enable our native people to overcome the logistical hurdles in exercising such rights.

Immigrants, native people, and other racial minorities confront further rigidity in another central institution - the police. In a number of communities, there have been allegations of nasty conflict between racial minorities and the police. Blacks, Asians, and native people have complained bitterly of harrassment, assaults, and beatings at the hands of various police officers.

What exacerbates the police-minority relationship is the nature of the institutional machinery for the handling of any complaints which the aggrieved citizens wish to lodge. Who is there to investigate the citizen's complaints? In most places, the police

investigate them. And who reviews the integrity of the investigation? Usually the chief of the department or one of his designates. And who ultimately adjudicates the validity of a complaint? In many communities, the police commission which also administers the police department. How are racial minorites or anyone else supposed to have confidence in this kind of a system? No matter how fair in fact the handling of any complaint may be, it simply could not appear fair. As long as these issues remain in the hands of those with departmental interests to protect, the police-minority relationship will suffer irreparable strains.

Despite the obvious merit in the minority group arguments about the need for independent machinery to handle these matters, our police and governmental establishments have responded with bureaucratic rigidity. Reforms have been slow in coming and, even when they have come, they have been demonstrably inadequate. Our police structures have been implacably reluctant to involve outsiders in the complaint mechanism. Even in Metropolitan Toronto, despite several inquiries and years of adverse publicity, the most that could be extracted was a three year experiment which combines external review with internal investigation. While certainly preferable to the old completely internal system, this experiment deeply disappointed the growing racial minorities in Canada's largest English speaking city. Another case of unwarranted institutional rigidity.

In this area, we believe that the federal government can provide leadership by example. It is time for the reform of the complaint structure within our federal police force - the RCMP. While bills have been introduced on this subject, they have not been enacted. But, even if they were, they too would disappoint. The government bills routinely failed to provide enough of the concomitants of independence.

Recommendation No. 5

> The federal government should introduce and Parliament should enact a bill providing for the independent investigation and review of civilian complaints against members of the RCMP.

Summary of Recommendations

Recommendation No. 1

Legislation should be enacted providing for contract compliance. As a condition of obtaining government contracts, private sector employers should be required to undertake a number of specific initiatives which are designed to broaden the participation of non-white minorities in their business operations. Non-compliance should render such employers subject to the termination of their contract benefits, mandatory compliance orders, and/or monetary damages.

Recommendation No. 2

The Canadian Human Rights Commission should be required to promote such initiatives in the federal public service and among federal Crown corporations in the following ways:

a) periodic investigation and review of employment practices in the public sector
b) recommendations to the relevant ministers and Crown corporation heads
c) progress reports to Parliament.

Recommendation No. 3

The federal government should undertake a review of licensing practices throughout the country. To whatever extent such review uncovered unfairness to our immigrant population, the federal government should call upon the affected provincial governments to make the appropriate changes.

Recommendation No. 4

The federal government should allocate sufficient resources in order more effectively

a) to inform our native people of their legal rights and
b) to enable our native people to overcome the logistical hurdles in exercising such rights.

Recommendations No. 5

The federal government should introduce and Parliament should enact a Bill providing for the independent investigation and review of civilian complaints against members of the RCMP.