

The Duty of Neutrality Beyond Saguenay:

Unconstitutional Prayers at Municipal Councils in British Columbia



BC Humanist Association
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Duty of neutrality beyond Saguenay:

Unconstitutional prayers at municipal councils in British Columbia

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Abstract

This study investigates the practice of beginning municipal council meetings in British Columbia with a prayer, after this practice was found to be unconstitutional by the Supreme Court in *Mouvement laïque québécois v. Saguenay (City)*, in 2015. Despite the court's ruling, the BC Humanist Association was notified that a number of BC municipalities continued to open their 2018 inaugural council sessions with prayer. To determine whether this practice is widespread across the province, BCHA researchers and volunteers visited the websites of municipalities, and examined their agendas, meeting minutes, and where possible, watched videos to determine if a prayer was conducted. In council meetings, this study determined that 23 BC municipalities continued to begin their inaugural council meetings with a prayer while none do so in regular council meetings. Additionally, it was found that all the prayers were delivered by members of Christian clergy, and delivered mostly by men (73.9%). The study concludes by arguing that the compliance of municipalities with the decision must be monitored by outside groups, including the BC Humanist Association.

Introduction to Project

This is the first of a series of reports that explore compliance by municipalities across Canada with the 2015 Supreme Court of Canada decision in *Mouvement laïque québécois v. Saguenay*. The British Columbia Humanist Association (BCHA) is compiling reports for all Canadian provinces and territories, and while reports will follow a similar model and method, each will explore issues specific to those jurisdictions.

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Introduction

In 2015, the Supreme Court of Canada rendered its decision in the case of *Mouvement laïque québécois v. Saguenay (Saguenay)*, ruling that including prayer in municipal council meetings was discriminatory and should not be permitted.¹ This decision was clear: beginning municipal council meetings with a prayer represented a violation of the state's duty of religious neutrality.

Despite this ruling, the BC Humanist Association (BCHA) received reports that a number of municipalities across British Columbia (BC) began their 2018 inaugural meetings with a prayer (or prayers). We were concerned to hear that BC municipalities were not in compliance with the ruling, particularly given how clearly *Saguenay* delineates the state's duty of religious neutrality, and that several years had elapsed since the decision was rendered.

Following these reports, the BCHA launched this research project to investigate the extent to which municipalities across BC were in compliance with the *Saguenay* decision. This project endeavours to determine which municipalities continue to open meetings with prayer in contravention of *Saguenay*.

The report begins with an exploration of the *Saguenay* case; providing background details of the decision and of the ruling. The methods used in the study are outlined, followed by our findings. Municipalities that were found to have violated *Saguenay* were approached, and the results of those communications are provided. The findings are explored in detail. Those wishing to read transcripts of some of the prayers identified can find them in the appendices.

The Saguenay Decision

The Canadian Charter guarantees “the freedom of conscience and religion” and as a result of evolving interpretations, it has been accepted that the state has a duty of religious neutrality in order to protect these freedoms.² In 2015, the duty and scope of state neutrality was clearly delineated in *Mouvement laïque québécois v. Saguenay (City)*. In a unanimous decision, the Supreme Court ruled that the Municipal Council of Saguenay breached its duty of religious neutrality through the recitation of religious prayer at the beginning of council meetings. In the decision, Justice Gascon stressed the “democratic imperative” for officials acting in positions of state power to maintain neutrality by not engaging in any form of religious practice.³

¹ *Mouvement laïque québécois v. Saguenay (City)*, 2015, SCC 16 [2015] 2 S.C.R. 3.

² *Saguenay*, Para. 71; and see Boissinot, J. (2015, April 17). “The end of prayer in the councils of the nation.”

³ *Saguenay*, Para.75.

Background

In December 2006, Mr. Simoneau, a resident of Saguenay, Quebec, who would regularly attended council meetings, raised a concern about a practice of the council. The Mayor opened council meetings by reciting a prayer and by crossing himself, with other council members and members of the public attending joining in. There were also religious symbols present within council meeting chambers, including a statue of the sacred heart washed in red light and a crucifix on the wall.⁴ As an atheist, Mr. Simoneau felt ‘uncomfortable’ with the displays of religion while attending meetings and asked the Mayor to stop the practice.⁵ After the Mayor ignored his request, Mr. Simoneau turned to the Commission des droits de la personne et des droits de la jeunesse (CDPDJ).

The Commission is a body created under the Quebec Charter, which investigates and resolves violations under that Charter.⁶ The Quebec Human Rights Tribunal (the Tribunal) is a specialized administrative tribunal that is part of the Commission and assists in rectifying violations under the Charter.⁷ In March 2007, the Commission opened an investigation into the alleged discrimination on the basis of religion in violation of sections 3 and 10 of the Quebec Charter.⁸ In May 2008, the Commission concluded that the prayer was discriminatory, but chose not to investigate the religious symbols (the Sacred Heart and the Crucifix). The Commission chose not to pursue action in the Tribunal, as it had recently ruled on a case it deemed similar.⁹ With the assistance of the Mouvement Laïque Québécois (the MLQ), Mr. Simoneau filed a case with the Tribunal in July 2008.¹⁰ While the Tribunal was reviewing the case, the Saguenay Council passed a bylaw which amended the wording of the prayer and also provided a 2 minute recess afterwards, in order to allow those who choose to abstain from prayer and thus absent themselves, to join the meeting.¹¹

⁴ *Ibid.* Para. 6.

⁵ *Ibid.* Para. 8.

⁶ Commission des droits de la personne et des droits de la jeunesse (CDPDJ). (n.d). “La commission: Origine et mission.”

⁷ *Saguenay*, Paras. 39 and 40; and see The Human Rights Tribunal. (n.d.). “About the Tribunal: Presentation.”

⁸ *Saguenay*, Paras. 8 and 9. Section 3 of the *Charter* states that: “Every person is the possessor of the fundamental freedoms, including freedom of conscience, freedom of religion, freedom of opinion, freedom of expression, freedom of peaceful assembly and freedom of association.” Section 10 states that: “Every person has a right to full and equal recognition and exercise of his human rights and freedoms, without distinction, exclusion or preference based on race, colour, sex, gender identity or expression, pregnancy, sexual orientation, civil status, age except as provided by law, religion, political convictions, language, ethnic or national origin, social condition, a handicap or the use of any means to palliate a handicap. Discrimination exists where such a distinction, exclusion or preference has the effect of nullifying or impairing such right.” See Charter of Human Rights and Freedoms, CQLR c C-12.

⁹ *Saguenay*, Para. 10.

¹⁰ *Ibid.* Para. 11.

¹¹ *Ibid.* Para. 12.

The Tribunal examined the case to see whether the “bylaw, the recitation of the prayer and the exhibiting of religious symbols” infringed upon Mr Simoneau’s right to exercise his “freedom of conscience and religion without discrimination based on religion.”¹² The Tribunal concluded that the “prayer was religious and was a breach of religious neutrality,” that the infringement of Mr Simoneau’s rights was ‘substantial,’ and that the bylaw was for a “religious purpose” and therefore also in violation.¹³ The Tribunal ultimately ruled that the bylaw should be “inoperative and invalid,” the practice of opening meetings with prayer should cease, the religious symbols should be removed, and that \$30,000 should be awarded to Mr Simoneau in damages.¹⁴

The Quebec Court of Appeal (Court of Appeal) reviewed the case on the basis that it was a “matter of importance to the legal system over which the Tribunal did not have exclusive jurisdiction,”¹⁵ and as a result, the standard of correctness should apply rather than reasonableness.¹⁶ This underscores the significance of the *Saguenay* ruling, as the standard of reasonableness asserts that more than one ruling can be made on a case. The ruling is a reasonable one as long as it falls within a “range of possible, acceptable outcomes” and can be supported by evidence and the law.¹⁷ Whereas the standard of correctness asserts that there is only one ruling that can be made on a case. The ruling is the only correct one and is reached after analysis of evidence and the law.

By applying the standard of correctness, the Court of Appeal concluded state neutrality “does not require the state to abstain from involvement in religious matters,” cultural and “religious heritage” could be reconciled, and that the updated prayer under the bylaw “expressed universal values” and was not overtly religious.¹⁸ It ultimately ruled that Mr. Simoneau had not been “discriminated against on the ground of freedom of conscience and religion” and reversed the decision of the Tribunal.¹⁹

In October of 2014, the Supreme Court of Canada reviewed the case and prior decisions made by the Tribunal and the Court of Appeal, ruling that the Tribunal was correct to order the Saguenay Council to “cease reciting a prayer in the municipal council chamber”, declared the bylaw inoperative, and awarded Mr Simoneau \$30,000 in damages.²⁰

The Supreme Court also ruled that the Tribunal erred in declaring the bylaw invalid and in ordering the removal of religious symbols because they lacked the jurisdiction to do so. While the Tribunal is able to declare a regulation, such as the bylaw, “inoperative and of no force,” only “a court of law has the power” to declare a bylaw invalid.²¹ Furthermore, because the Commission’s investigation had not included the religious symbols, the Tribunal lacked the authority to order their removal.²²

¹² *Ibid.* Para. 14.

¹³ *Ibid.* Paras. 15 and 16.

¹⁴ *Ibid.* Para. 17.

¹⁵ *Ibid.* Para. 18.

¹⁶ *Ibid.* Paras. 49 and 50.

¹⁷ *Ibid.* Para. 50.

¹⁸ *Ibid.* Paras. 20 and 21.

¹⁹ *Ibid.* Para. 22.

²⁰ *Ibid.* Paras. 151, 155, 160, and 161.

²¹ *Ibid.* Paras. 152 and 153.

²² *Ibid.* Para. 156.

In reaching its decision, Justice Gascon, on behalf of the majority, outlined the errors in the standards of review used in subsequent decisions, the inclusion of religious symbols, and ultimately “whether the prayer recited at the start of the City’s public meetings and the by-law regulating its recitation constituted discriminatory interference with Mr. Simoneau’s freedom of conscience and religion.”²³

Decision

In prefacing his decision on whether prayer had a place in municipal council meetings, Justice Gascon ruled that the Court of Appeal had erred by applying standards of appeal instead of standards of judicial review to the Tribunal’s decision. The Court of Appeal also erred in using the standard of correctness instead of reasonableness. As a specialized administrative tribunal, the Tribunal should have been shown deference and their decision, although different from the one the Court of Appeal would have made, was “defensible in respect of the facts and law.”²⁴

In determining whether or not the prayer was discriminatory, Justice Gascon established the scope of the “state’s duty of neutrality in the context of freedom of conscience and religion” and then whether or not the prayer was in violation of this duty.²⁵ The Canadian and Quebec Charters do not explicitly impose a duty for the state to remain neutral in matters of religion and belief, however, expanding on previous decisions, Justice Gascon found that in order to protect the “variety of beliefs” under the Canadian Charter, there is a need for “true neutrality.”²⁶ Justice Gascon elaborated that

True neutrality is concerned not with a strict separation of church and state on questions related to religious thought. The purpose of neutrality is instead to ensure that the state is, and appears to be, open to all points of view regardless of their spiritual basis. Far from requiring separation, true neutrality requires that the state neither favour nor hinder any religion, and that it abstain from taking any position on this subject. Even if a religious practice engaged in by the state is ‘inclusive,’ it may nevertheless exclude non-believers.²⁷

Justice Gascon ruled that there was no way for the state to remain neutral while also engaging in a religious practice, because doing so creates a “hierarchy” where those who share the expressed beliefs are ranked above those who do not share them. Justice Gascon also explained that true neutrality is a “democratic imperative” as it ensures that institutions, like a municipal council meetings, are a “neutral public space that is free of discrimination and in which true freedom to believe or not to believe is enjoyed by everyone equally.”²⁸

²³ *Ibid.* Para. 23.

²⁴ *Ibid.* Para. 50.

²⁵ *Ibid.* Para. 64.

²⁶ *Ibid.* Paras. 68 and 71.

²⁷ *Ibid.* Para. 137.

²⁸ *Ibid.* Paras. 73-75.

In *Saguenay*, Justice Gascon concluded that the prayer was in violation of the state's duty of true religious neutrality and an infringement upon "Mr. Simoneau's right to exercise his freedom of conscience and religion."²⁹ The prayer itself was expressly religious as denoted by the context (the content, the sign of the cross, the religious symbols) and by admission of the Mayor of Saguenay himself who declared

I'm in this battle because I worship Christ. When I get to the hereafter, I'm going to be able to be a little proud. I'll be able to say to Him: "I fought for You; I even went to trial for You". There's no better argument. It's extraordinary. I'm in this fight because I worship Christ. I want to go to heaven and it is the most noble fight of my entire life.³⁰

This supported the conclusion that the Mayor and Council used public powers to engage in a practice where they "adopted or favoured one belief to the exclusion of others" while acting on behalf of the state, and thus turning council meetings into a "preferential space for people with theistic beliefs."³¹

Although the Saguenay Council had also allegedly tried to accommodate those who chose to abstain from prayer through the introduction of the bylaw that amended the wording of the prayer and allowed for a two minute recess, it had the opposite effect and actually exacerbated Mr. Simoneau's sense of "isolation, exclusion and stigmatization" by being forced to either conform or reveal his non-belief by physically separating himself.³²

In addition to determining whether the state's duty of religious neutrality was breached, Justice Gascon ruled that the Court of Appeal had erred by applying standards of appeal to the Tribunal's decision instead of standards of judicial review. Furthermore, As a specialized administrative tribunal, the Court of Appeal should have deferred to the Tribunal and presumed the standard of review should have been reasonableness for the entire appeal, even if the question of the scope of the state's duty of neutrality should have used the standard of correctness.³³

Justice Gascon also asserted that it "was not open to the Tribunal" (along with the Court of Appeal) to rule on the religious symbols, because the Commission had not included it in their initial investigation.³⁴ However, he did acknowledge that their presence did hold significance for the context of the case as a whole and could be included in the investigation into the prayer.³⁵

²⁹ *Ibid.* Para. 120.

³⁰ *Ibid.* Para. 92 and 116, emphasis removed.

³¹ *Ibid.* Paras. 113 and 120.

³² *Ibid.* Paras. 120 and 121.

³³ In her concurrence, Justice Abella agreed with the error in application of standard of review, however, she argued that the Tribunal's decision should not be broken into "many component parts and reviewed under multiple standards of review" (*Ibid.* Para. 165).

³⁴ *Ibid.* Para. 53.

³⁵ *Ibid.* Para. 62.

Consequences of Saguenay

The *Saguenay* decision has led to further development of the scope of the “state’s duty of neutrality in the context of freedom of conscience and religion” by requiring the state to practice “true neutrality.” This means “abstaining from taking any position and thus avoid adhering to a particular belief.”³⁶ In practice, the *Saguenay* decision outlined that state officials acting in an official capacity must not profess or practice any religious belief. This includes the abstention of prayers at municipal council meetings. As summarized by Justice Gascon

By expressing no preference, the state ensures that it preserves a neutral public space that is free of discrimination and in which true freedom to believe or not to believe is enjoyed by everyone equally, given that everyone is valued equally.³⁷

As such, beginning a municipal council meeting with prayer is strictly proscribed by law, and this prohibition is part of the democratic imperative of the state’s duty of religious neutrality.

Since the *Saguenay* decision, many municipal councils across the country have amended their procedures to abolish prayers from council meetings in order to comply with the Supreme Court’s ruling, but apparently not all. In her recent book, Lori Beaman documented a number of municipal officials who, commenting after the ruling, expressed an intention to violate *Saguenay*. For example, Caledon, Ontario Mayor Allan Thompson declared that “Personally I am disappointed and I don’t support it... Canada was built on a Christian law. We’ve shown tolerance to all faiths... and I am not about to erode our principles.”³⁸ Along a similar vein, the Mayor of Oshawa, Ontario announced that “I’m proud to be a Canadian, [and] I intend to continue doing the Lord’s Prayer prior to the commencement of the council meetings.”³⁹ Given this response, we decided to explore whether any municipal councils continue to include prayer in their proceedings in direct opposition to *Saguenay* and the state’s duty of religious neutrality.

³⁶ *Ibid.* Paras. 72 and 137.

³⁷ *Ibid.* Para. 74.

³⁸ Beaman, LG. (2020). *The transition of religion to culture in law and public discourse*. London, UK: Routledge.

³⁹ *Ibid.*

Methodology

Given the *Saguenay* decision, no municipal council meeting in Canada should begin with, or include a prayer. However, the BCHA received reports that several municipalities included prayer as part of their inaugural meetings following the 2018 province-wide municipal elections. In order to determine the number of municipalities that continued to include prayer in their meetings, we set about further investigating the issue.

We began by compiling a comprehensive list of all BC municipalities, from information available on CivicInfoBC.⁴⁰ Using this list, we reached out to municipalities directly through email (see Appendix 2). This letter, sent to the general inquiries email, informed the municipal council and government of the ruling, and inquired as to whether or not sessions of their council (inaugural or otherwise) included prayer. The response rate for this correspondence was low and entirely from councils already in compliance with *Saguenay*. From this we concluded that additional research was required. Two summer researchers were tasked to systematically investigate the practices of each municipality.

We knew that at least a handful of municipalities included prayer(s) in their inaugural 2018 meetings and hypothesized that inaugural meetings in general were more likely to include prayer(s) as compared to regular council or committee sessions. Inaugural meetings tend to include more ceremonial elements, presentations from visiting dignitaries, oaths of office, and similar performative elements and protocol. Religious elements like prayers are sometimes included as part of these ceremonial elements by those operating under the belief that doing so solemnifies the proceedings.⁴¹ While we hypothesized that prayer was more likely included in the agendas of inaugural meetings, we could not discount the possibility of some BC municipalities including prayer in regular meetings. As a result, we investigated for both possibilities.

For each municipality, researchers visited the municipal website, and located the agenda, minutes, and where possible an audio/video recording of the most recent inaugural (post-*Saguenay*) meeting. These materials were then reviewed to verify whether or not the meeting included a prayer or prayers. Municipalities found to have included prayer(s) in their inaugural meeting were recorded in a table, along with additional information about the person who delivered the prayer. In order to verify whether or not regular meetings of councils included prayer(s), researchers selected three to five recent meetings from the council (post-April 2015) and inspected the agendas, minutes, and where possible, any audio/video recordings of these meetings for prayer(s). If researchers were unable to find agendas, minutes, or recordings of inaugural or regular council meetings, they were instructed to contact the municipality directly by email and/or phone.

⁴⁰ See CivicInfoBC. (2019). “Municipalities.”

⁴¹ See Phelps Bondaroff, T.N., Bushfield, I., Marshall, K.E., Prasad, R., & Laurence, N. (2019, September). “House of prayers: An analysis of prayers in the Legislative Assembly of British Columbia, 2003-2019.” *BC Humanist Association*, 1-138, 35-36. And for discussions of ‘civic religion’ and ‘ceremonial deism’ see Delahunty, R.J. (2007). “‘Varied carols’: Legislative prayer in a pluralist polity.” *Creighton Law Review*, 40, 529; and Marshall, W. P. (2002). “The limits of secularism: public religious expression in moments of national crisis and tragedy.” *Notre Dame Law Review*, 78(1), 11-33.

Where instances of prayer were identified, researchers recorded the name, affiliation, and gender of the person delivering the prayer. In order to capture the specific content of the prayers, researchers copied verbatim written minutes or transcribed audio/video recordings of the prayers when these were available.

We also wanted to determine whether or not change in practices had occurred as a result of the *Saguenay* decision, and as such instructed the researchers to inspect the minutes of the 2014 inaugural meetings and the minutes of three to five randomly selected regular meetings prior to April 2015 for evidence of prayer. We found that a number of municipalities had changed their practices since *Saguenay*, including the Districts of Barriere, Clearwater, Tumbler Ridge, and the Cities of Williams Lake, Dawson, Nelson, among others. While this change was evidenced by the procedures followed at meetings, we could not establish a causal relationship between the *Saguenay* decision and the change. When we approached municipalities regarding reasons for any change (see Appendix 2), most could not identify the cause, and those who could, denied that *Saguenay* had had any influence. As a result, this information was not included in this report.

Findings

Of the 162 municipalities in BC, we found 23 had included prayer in their 2018 inaugural meetings in violation of the *Saguenay* decision and of the Canadian Constitution. Of these prayers, all (100%) were delivered by representatives of various Christian sects, with 17 (73.9%) delivered by men. By comparison, the 2016 Census determined that 49.0% of British Columbians are male.⁴² Furthermore, according to the 2011 National Household Survey, 44.6% of British Columbians identified themselves as Christian,⁴³ and a survey conducted by the BCHA in 2016 identified only 27% of British Columbians as practicing a religion or faith, of which 82% were Christian.⁴⁴

No municipalities were found to have included prayer in regular meetings. All but one of the municipalities which opened their 2018 inaugural meetings with a prayer featured a single prayer. The District of Saanich featured two prayers: a ‘multi faith blessing’ and a ‘blessing,’ both of which were delivered by members of the clergy of Christian sects.

⁴² Statistics Canada. (2017). *British Columbia [Province] and Canada [Country]* (table). *Census Profile*.

2016 Census. Statistics Canada Catalogue no. 98-316-X2016001. Ottawa. Released November 29, 2017.

⁴³ Statistic Canada. (2011). *Age and sex highlight tables, 2011 Census*. National Household Survey, 2011. Modified, August 4, 2020.

⁴⁴ BC Humanist Association. (2016, June 13). “Religious and secular attitudes.”

| Municipality | Type | Pop'n⁴⁵ | Affiliation of Person Delivering Prayer | Religion | Gender |
|-------------------------|-------------|---------------------------|--|-----------------|---------------|
| 100 Mile House | District | 1,886 | Hillside Community Church | Christian | M |
| Armstrong | City | 4,815 | First Baptist Church | Christian | M |
| Chilliwack | City | 83,790 | Salvation Army | Christian | M |
| Clearwater | District | 2,324 | Clearwater Christian Church | Christian | M |
| Creston | Town | 5,306 | Redeemer Lutheran Church | Christian | M |
| Dawson Creek | City | 12,978 | Dawson Ministerial Association | Christian | M |
| Lake Cowichan | Town | 2,974 | Lake Cowichan Christian Fellowship | Christian | F |
| Langley | City | 25,888 | Christian Life Assembly | Christian | M |
| Langley | Township | 143,224 | Christian Life Assembly | Christian | M |
| Nanaimo | City | 90,505 | St. Paul's Anglican Church | Christian | F |
| Nelson | City | 10,664 | St. Saviour's | Christian | M |
| City of North Vancouver | City | 48,196 | Salvation Army | Christian | M |
| Parksville | City | 12,514 | Parksville Fellowship Baptist Church | Christian | M |
| Peachland | District | 5,428 | United Church | Christian | M |
| Port Coquitlam | City | 58,612 | Trinity United Church | Christian | M |
| Qualicum Beach | Town | 8,943 | St. Stephen's United Church | Christian | M |

⁴⁵ Using numbers from the 2016 Statistics Canada Survey. Statistics Canada. (2019, June 17). *Census profile, 2016 Census, provincial data, British Columbia*. Census subdivisions (municipalities).

| | | | | | |
|---------------|----------|---------|------------------------------------|-----------|---|
| Saanich | District | 119,229 | Victoria Church of the Nazarene | Christian | M |
| | | | First Unitarian Church of Victoria | Christian | F |
| Spallumcheen | Township | 5,055 | First Baptist Church | Christian | M |
| Terrace | City | 11,486 | Salvation Army | Christian | M |
| Trail | City | 7,709 | First Presbyterian Church | Christian | F |
| Victoria | City | 92,141 | Christ Church Cathedral | Christian | F |
| White Rock | City | 19,952 | Church of the Holy Trinity | Christian | F |
| Williams Lake | City | 10,832 | Calvary Church | Christian | M |

A number of municipalities also included Indigenous content in their inaugural meetings, as part of an Indigenous welcome ceremony or territorial acknowledgement. As our researchers were concerned with prayer, they did not record instances of territorial acknowledgements, but they did flag a number of agenda items identified as ‘First Nations Prayer’ or ‘Blessing’ in their inaugural meeting. The following findings represent edge cases, somewhere between territorial acknowledgements and prayer:

- The City of Kelowna (pop. 132,084) included a ‘First Nations Prayer’ delivered by Jordan Coble, a councillor on the Westbank First Nation Local Government.⁴⁶
- The City of Powell River (pop. 13,157) included a ‘Blessing’ delivered by Dr. Elsie Paul of the Tla’amin Nation.⁴⁷
- The City of Duncan (pop. 4,944) began with the mayor and council entering in procession to drumming by Cowichan Tribe elders Robert George, Tousilum (Ron George) and Ed Elliot. This was followed by an ‘Opening Prayer’ that included an opening statement by Cowichan Tribe elders Peter Williams and Mena Williams, and “Peter Williams gave a prayer in hul’q’umi’num,” after which Tousilum (Ron George) “spoke about the ceremony that took place on Sunday, November 4, the history of the City Hall building as the Indian Affairs Office and walking a new path together going forward.”⁴⁸
- The District of Saanich (pop. 119,229) included a ‘First Nations Blessing’ that featured a song, drumming, and a prayer delivered by Christine Sam of the Songhees Nation, and included overt religious references (mention of Jesus and other religious language) among other things.

⁴⁶ City of Kelowna. (2018, November 5). “Inaugural Council meeting – Agenda”; and see Westbank First Nation. (2020). “Council biographies.”

⁴⁷ City of Powell River. (2018, November 6). “Council meeting November 6, 2018.”

⁴⁸ City of Duncan. (2018, November 5). “Minutes.”

- The City of Williams Lake (pop. 10,832) featured traditional drumming and a blessing by Chief Willie Sellars, of the Williams Lake Indian Band.⁴⁹

These five cases were excluded from the data set as it was difficult to classify them strictly as prayers akin to the one recited in *Saguenay*. These agenda items occupy a complex space between prayers, traditional welcomes, and territorial acknowledgements, something which is explored in the discussion section below.

As far as the content of the prayers, we were only able to find audio/visual recordings for seven municipalities, eight prayers in total (as one municipality had two prayers), and these have been reproduced in Appendix I. Five of these prayers overtly evoked the name of Jesus/Christ. While not specifically mentioning this religious figure, the lengthy prayer delivered at the City of Victoria inaugural council meeting referenced Christian doctrine and preached, among others, salvation through faith and love. The prayer delivered at the City of Nanaimo inaugural meeting could be described as ecumenical, making reference to a singular god, while not specifying the god. While the ‘Multi-Faith Blessing’ delivered at the District of Saanich inaugural meeting was the only one that could be considered a ‘secular invocation’ or a ‘non-sectarian prayer’ in so far as it lacked reference to a god, gods, or the use language particular to a specific religion.

It is worth noting potential sources of error. We were unable to find information regarding the contents of the inaugural meetings of five municipalities: Clinton (pop. 641), McBride (pop. 616), Port Edward (pop. 544), and Port McNeill (pop. 2,064). Prayer remains a feature of other levels of government in Canada: daily sessions of the BC Legislature and Canadian Parliament (Commons and Senate) open with prayer. In the case of Parliament, the public is excluded from the chambers for the duration of the prayer, a practice that mirrors that of the British Parliament.⁵⁰ As a result, the possibility exists for prayer to be included in a municipal council meeting but not referenced in the agenda or minutes of that meeting. This, however, we considered to be unlikely, in so far as such a practice would be evident on audio/visual recordings of meetings, and that if the public were excluded from the meeting for a prayer, this disruption would have similarly been evident on audio/visual recordings. Furthermore, agendas and minutes typically document all dignitaries involved in the ceremonies in some detail, and the inclusion of an individual delivering a prayer would most likely have been noted by our research team. Councillors praying on their own or in a small group in private prior to a meeting was also not considered, in as much as a private or informal practice would not violate the state’s duty of religious neutrality as outlined in *Saguenay*.

⁴⁹ City of Williams Lake. (2018, November 6). “Minutes of the inaugural meeting.”

⁵⁰ See for example Fizet, C. (2010, June 2). “Reopening the discussion on the use of ‘the Lord’s Prayer’ in the Ontario Legislature.” Paper presented at the *2010 Annual Meeting of the Canadian Political Science Association*, Concordia University, Montreal, Canada, p. 2; and MacMinn, EG. (2008). *Parliamentary practice in British Columbia*. 4th Ed. Government of British Columbia, p.56.

Municipal Responses

The BCHA contacted the 23 municipalities that included prayer in their 2018 inaugural meetings to inform them about the *Saguenay* decision and its impact on procedures at future inaugural meetings (see Appendix 3). Specifically, we asked that steps be taken to ensure that future inaugural sessions are compliant with the decision and not include an invocation or prayer. Not all of the municipalities contacted have as yet responded (as of September 2020), but for those who did, the following chart outlines their responses:

| Municipality | Response? | Summary of Response ⁵¹ |
|---------------------|-----------|---|
| 100 Mile House | Y | No direction was received from Council to make changes. |
| Armstrong | N | - |
| Chilliwack | Y | We will make a note of it for the next Inaugural Session that occurs. |
| Clearwater | N | - |
| Creston | Y | Please know that we will make note of your concern for future Inaugural Council meeting agendas. |
| Dawson Creek | N | - |
| Lake Cowichan | N | - |
| City of Langley | Y | Council passed the following resolution: "That the correspondence from the BC Humanist Association dated January 22, 2020 regarding a request to confirm Council will take steps to ensure future inaugural sessions are compliant with the Supreme Court's Ruling and will not include an invocation or prayer be received for information." |
| Township of Langley | Y | Summary: Amended the Council Procedure Bylaw in November 2019. This amended bylaw removed the invocation from the scheduled agenda and will not be included going forward. ⁵² |
| Nanaimo | N | - |

⁵¹ Please note that the responses copied here are direct quotes from correspondence with complimentary close and greetings removed, unless where specified.

⁵² Township of Langley. (2019, November 4). "Report to Mayor and vouncil - Township of Langley Council Procedure Bylaw 2016 No. 5199 Amendment Bylaw 2019 No. 5522." Report No. 19-163, File 3900-25.

| | | |
|-------------------------|---|--|
| Nelson | Y | In the future, the perspective of religious neutrality will be provided to any incoming council for consideration. |
| City of North Vancouver | Y | We will take this into consideration when it comes time to plan the next inaugural meeting following the 2022 general local election. |
| Parksville | Y | Your email has been received and the information will be taken into consideration. |
| Peachland | N | - |
| Port Coquitlam | Y | The City reviews all of its practices leading up to each election. |
| Qualicum Beach | Y | The Town has a practice of working with the newly elected officials and our solicitor to finalize the details of the inaugural meeting. As a result of this approach, we do expect to see changes on an ongoing basis. |
| Saanich | Y | The District of Saanich has not taken any action in planning the 2022 Inaugural Meeting and would only do so once a Mayor-Elect has been declared after the General Local Election of 2022. We will take your comments into consideration for planning in 2022. |
| Spallumcheen | Y | This is to confirm that the Township will not be providing a Prayer of Invocation at our Inaugural Meetings. |
| Terrace | Y | We will review this practice before the next inaugural meeting is organized for 2022. |
| Trail | Y | The City of Trail's Council Procedure Bylaw does not contain any provisions that an Invocation to be included in the agenda for an Inaugural Meeting. Past practice had included an Invocation as a form of welcome. The City of Trail will not be including an Invocation in any future Inaugural Meetings. |
| Victoria | N | - |
| White Rock | Y | The next Council Inaugural will be held November 2022. At that time consideration will be given to this. |
| Williams Lake | Y | We are well ahead of the next election cycle. No planning has yet begun for an inaugural meeting. We are aware of and have reviewed the <i>Mouvement laïque québécois v. Saguenay (City)</i> 2015 SCC 16 decision. It is the policy and practice of our organization to encourage diversity, tolerance and inclusion. Although it would be premature |

| | | |
|--|--|---|
| | | to speculate on the outcome of the planning process, whatever decisions are made with respect to the inaugural meeting will reflect those values. |
|--|--|---|

Discussion

The *Saguenay* decision was rendered in 2015, giving BC municipalities slightly less than three years to amend their procedures and protocols before the inaugural meeting following the 2018 municipal election. We recognize that it is possible that municipalities, and in particular municipal staff and elected officials caught up in the process of organizing an inaugural meeting, might not have been aware of the ruling or its impact on the elements included in an inaugural meeting. We also understand that the decision-making process regarding what elements are included in an inaugural meeting may vary from municipality to municipality.

Christian Hegemony

Given the historic dominance of Christianity as the majoritarian religion in BC, both numerically and with respect to colonialism, it is perhaps to be expected that the majority of the prayers delivered at inaugural council meetings in 2018 would be delivered by members of various Christian sects and include Christian content. It was not expected that *all* those delivering prayers would be Christian.

The language of some of the prayers should reflect the significance of the *Saguenay* decision, and demonstrate the exclusionary nature of including prayer in council meetings. When a prayer is offered in “Jesus’ name,” it is very clear which religious tradition is favoured by the state, yet the language used in many of the prayers was even more emphatic. For example, when Pastor Alfred Esdaille described City of North Vancouver council members as ‘God’s servants,’⁵³ or Pastor Gary Bennett called for members of the District of Saanich Council to “work together in ways that reflect your goodness, your grace, and your glory, and we pray this, in the name of Jesus, amen,”⁵⁴ they are assuming all the members of the council are co-religionists, regardless of the actual beliefs of those council members.

In other examples, Reverend David Roch reminded the City of Dawson Creek Council of a scripture that says “God raises one up and puts another one down, so you’re in this position because God put you there and it’s a privilege to be there and thank you for serving, thank you for serving.”⁵⁵ Or Pastor Dr. Paul Hawks who declared “Sovereign God, thank you for your concern for those who live in Parksville, evident today by your provision of this leadership for our community. We do pray now for those you have placed in authority over us.”⁵⁶

⁵³ City of North Vancouver. (2018, November 5). “2018 council videos.”

⁵⁴ District of Saanich. (2018, November 5). “Agenda.”

⁵⁵ City of Dawson. (2014, December 1). “Inaugural meeting of city council”; and see City of Dawson. (2018, November 5). “Inaugural meeting of city council.”

⁵⁶ City of Parksville. (2018, November 5). “Inaugural council meeting agenda.”

The gentlemen are ascribing the outcome of the election to the will of their god, and are in essence stripping the electorate of agency. Such statements turn “meetings into a preferential space for people with theistic beliefs.”⁵⁷ It becomes clear why Justice Gascon was so emphatic in describing the state’s duty of religious neutrality to be based on a democratic imperative. Such deliverances do not “encourage everyone to participate freely in public life regardless of their beliefs.”⁵⁸ Rather, they appear to exclude non-believers and believers of other faith traditions from the space and even the electoral system.

Even in attempts at ecumenicism and secularity one encounters exclusion and the hegemony of Christianity. For example, the District of Saanich’s use of two prayers; a ‘multi faith blessing’ and a ‘blessing.’ Despite the seemingly secular nature of the former, it was delivered by a member of the clergy of a Christian church and presented alongside an overtly Christian prayer. There arises three issues regarding such an approach which we will explore in turn: non-Christian faith traditions are presented as guests in the space, the effort attempts to elevate prayer to something that is or can be seen as universal, and even the most accommodating attempts at non-denominational or ‘secular’ prayer will be exclusionary. Ultimately, efforts to include other faith traditions in this manner treat these traditions as guests while continuing to exclude non-believers.

In the model adopted by Saanich, Christianity is framed as the dominant religion, with other religions being ‘accommodated’ through a multi faith blessing, with the non-religious excluded entirely. The idea of inviting ‘other’ religions to participate, or in the case of Saanich, to be represented, in a multi faith blessing, is a form of ‘inclusive generosity’ where other religious beliefs traditions are granted inclusion as a guest. Such a gesture fundamentally produces an opposite effect, further reinforcing Christian hegemony. As Beaman explains, “hegemony describes the status quo of ideas and implies the domination of one group over another, or others. In relation to religion, hegemony relies on a sense of what is ‘normal’ religion.”⁵⁹ Here we have the ‘normal’ blessing which is contrasted to the multi faith blessing. The idea that one ‘multi faith blessing’ could possibly capture the diversity of beliefs and all faith traditions (other than that encapsulated by the ‘blessing’) is outrageous, as is the idea that all ‘other’ faiths could be represented or included by such a practice. The fact that this multi faith, and seemingly ‘secular’ blessing is itself delivered by a member of the Christian clergy reveals what Beaman describes as the “tainted neutrality of the secular,” where “‘secular’ is another name for a vague Christianity there is little social space to practice either the freedom to be religious differently or the freedom not to be religious at all.”⁶⁰

⁵⁷ *Saguenay*, Para. 120.

⁵⁸ *Ibid.* Para. 75.

⁵⁹ Beaman, LG. (2003). “The myth of pluralism, diversity, and vigor: The constitutional privilege of Protestantism in the United States and Canada.” *Journal of the Scientific Study of Religion*, 42(3), 311-325, 314.

⁶⁰ Beaman, LG. (2010). “Is religious freedom impossible in Canada?” *Law, Culture and the Humanities*, 8(2), 266-284, 280, citing Jakobsen & Pellegrini, *Love the Sin*, p. 114.

Including this seemingly ‘secular’ prayer attempts to elevate prayer into something that can capture and reflect universal values, whereas, both the act of prayer and the content of the prayer are exclusionary. The practice of reciting prayer belongs to a particular segment of society and not everyone.⁶¹ As a result, the idea of accommodating non-Christian faith traditions and the non-religious with a secular prayer or multi-faith blessing attempts to grafts ‘secular’ branches onto a Christian tree. This practice overtly excludes non-believers and those from faith traditions, including a number of Christian sects, for which prayer, or public prayer, is anathema. Many faith traditions have strict protocols and practices with respect to prayer – such as timing, location, who can or cannot be present, who must be present, even such things as the characteristics, mindset, gender, hygiene, or clothing of the person delivering the prayer.⁶² Furthermore, the idea of a non-denominational or secular prayer can exclude believers who might find this form of generic or ‘off-brand’ ceremonial deism offensive.⁶³ As such, in attempting to represent everyone, this practice fails to effectively represent anyone.

The belief that public prayer is an acceptable practice and one that honours faith traditions is a belief that is undergirded with a number of presumptions regarding what is religion and what are acceptable religious practices, furthermore, these assumptions are not shared by all. As Beaman explains, transmuting prayer into something that encapsulates “universal and inclusive shared values... contributes to exclusionary practices in diverse societies. It does this by fabricating an entrenched vision and version of a history that belongs only to a particular segment of society, which is in turn located at the apex of a hierarchy of citizenship and belonging.”⁶⁴ In other words, the act of prayer, regardless of the content of that prayer, is not a universal practice, and assuming that it is, is in and of itself a manifestation of the hegemony of one particular belief tradition. Or as Delahunty elaborates, “every prayer, by its very nature, reflects and conveys a particular system of beliefs about the nature of ultimate reality and is thus ‘sectarian.’”⁶⁵

Furthermore, the idea that the content of a non-denominational or secular prayer can appeal to some sort of shared universal values has been criticized by commentators, and was rejected by *Saguenay*. Simply put, it is impossible to craft a prayer that is truly universal. No common denominator exists. Every word is saturated with assumptions - about reality and morality - that are not universally shared. As we explained in *House of Prayers*, “the simple choice of one word over another can serve to signal to the public that the state favours one denomination or interpretation over another, thereby excluding those who adhere to other interpretations.”⁶⁶ Or as Delahunty explains, “however inclusionary or ecumenical a prayer is intended to be, it necessarily incorporates a particular theological viewpoint or belief.”⁶⁷ Wars have quite literally been fought over minor differences in dogma and religious practice.

⁶¹ Beaman 2020.

⁶² Phelps Bondaroff *et al.* 2019: 23.

⁶³ Marshall 2002; Delahunty 2007.

⁶⁴ Beaman 2020.

⁶⁵ Delahunty 2007:522.

⁶⁶ Phelps Bondaroff *et al.* 2019:22.

⁶⁷ Delahunty 2007:522.

As Stone explained when discussing school prayer, “the very concept of a ‘nondenominational prayer’ is self-contradictory.”⁶⁸ *Saguenay* dispenses with the possibility of inclusive, non-denominational prayer by ruling that “even if a religious practice engaged in by the state is ‘inclusive,’ it may nevertheless exclude non-believers.”⁶⁹ Or as the ruling explicitly states: “a prayer, even a non-denominational one, is a religious practice that excludes atheists and agnostics.”⁷⁰

Gender

Given the dominance of men in positions of authority within the hierarchies of various religions it is perhaps unsurprising to find that 17 (73.9%) of the prayers were delivered by men. This result is consistent with distributions of the gender of those delivering prayers or reflections in other legislative settings. For example, the Scottish Parliament includes ‘Time for Reflection’ as part of the agenda of its meetings. This segment features a four minute presentation by an invited speaker, with the “pattern of speakers reflects[ing] the balance of beliefs in Scotland (based on the Census).”⁷¹ The Scottish Parliament Information Centre maintains detailed records of all speakers, broken down by belief and gender, and found that despite the speakers more or less reflecting the diversity of beliefs in Scotland, that the speakers were disproportionately male: 76% (2016-2017), 71% (2017-2018), 63% (2018-2019), and 74% (2019-2020).⁷² The gender composition of those delivering the prayers demonstrates further exclusion resulting from prayer in municipal council meetings.

Responses

The majority (16/23) of municipalities whose 2018 inaugural meetings were found to violate *Saguenay* responded when we reached out to them. Of those who responded, the vast majority (11/16) came in the form of ‘we will make note of this for our next inaugural meeting,’ ‘we will take this information under advisement,’ or the slightly more promising ‘we will review our procedures prior to the next inaugural meeting.’ The City of Langley passed a resolution confirming receipt of our letter. Two municipalities (Spallumcheen and Trail) in their responses committed to not including prayer in their next inaugural meetings, and the Township of Langley amended their procedural bylaws, removing invocations from future agendas and meetings.

⁶⁸ Stone, Geoffrey R. (1983). “In opposition to the school prayer amendment.” *The University of Chicago Law Review*, 50, 823-848; see also Delahunty 2007:523.

⁶⁹ *Saguenay*, Para. 137.

⁷⁰ *Ibid.* Para. 92.

⁷¹ Scottish Parliament. (2020, August 20). “Scottish Parliament fact sheet: contributors to time for reflections: sessions 5.”

⁷² *Ibid.* p.12.

Indigenous Content

In designing the study, we were aware that some municipalities include an Indigenous territorial acknowledgement at the beginning of their regular or inaugural meetings. Others might also include a traditional Indigenous welcome ceremony or portions thereof as part of the inaugural meeting. Inclusion of these practices can play an important, albeit largely symbolic, part in reconciliation. We should welcome them and expect to see an increase in their expression as reconciliation grows in importance in political discourse in BC.⁷³

While this study is not intended to provide a detailed consideration of how territorial acknowledgements and Indigenous welcome ceremonies fit into municipal council meetings, we do wish to provide some discussion with respect to complexity at play. There is, after all, a considerable difference, both culturally and historically, between the practice of beginning a meeting with a Judeo-Christian invocation and Indigenous ceremonies or ritual welcomes.

As explored in *Decolonizing Legislative Prayers*,⁷⁴ the practice of beginning formal meetings with a prayer dates back to efforts to unify Protestant and Catholic factions in England in the 16th Century. This formed part of the Elizabethan Religious Settlement following the English Reformation and represented an effort by the state to impose a single religious viewpoint on the populous.⁷⁵ This mindset infused colonialist efforts in North America during the subsequent centuries. Legislative prayers derive from an effort to promulgate one perspective on the masses. Secular arguments against such prayers, including those delineated in *Saguenay*, are grounded in individual liberty free from such coercive efforts.

By contrast, there is no documented evidence or arguments that Indigenous welcome ceremonies or traditional acknowledgements attempt to disseminate a particular worldview. Such practices are rooted in efforts aimed at acknowledging harms caused by colonialism, in preserving traditional cultural practices, and in recognizing the work required in the journey towards reconciliation. In the case of territorial acknowledgements, this can include the recognition that the ownership of specific lands are still in dispute in much of present day Canada. British Columbia in particular, was simply occupied by colonizers without negotiated treaties, or where treaties were signed, they were not honoured by the Crown.

Blurring the line between the two practices are those councils that, as noted above, included Indigenous or First Nations' blessings as part of their inaugural meetings. We observed that such acknowledgements sometimes included more Abrahamic religious elements. For example, the 2018 inaugural meeting of the District of Saanich contained a 'First Nations Blessing' that included a prayer with overt Christian language and gestures.⁷⁶ Similarly, the 2018 inaugural meeting for the City of Duncan featured an 'Opening Prayer' which included "a prayer in hul'q'umi'num."⁷⁷

⁷³ Phelps Bondaroff, T.N., Bushfield, I., Marshall, K.E., Prasad, R., Laurence, N. (2020, May). "Decolonizing legislative prayers: A house of prayers supplementary report." BC Humanist Association, 1-26.

⁷⁴ *Ibid.*

⁷⁵ *Ibid.* p.7; and see Sanford, M. (2013). "Traditions and customs of the house: House of Commons background paper"; and Neale, J.E. (1950, July). "The Elizabethan Acts of Supremacy and Uniformity." *The English Historical Review*, 65(256), 304-332.

⁷⁶ District of Saanich 2018.

⁷⁷ City of Duncan 2018.

It is not surprising to find such complexity given the nature of colonialism. A large component of colonialism consisted of efforts to ‘Christianize’ Indigenous peoples.⁷⁸ It therefore follows that today, many Elders retain a mix of Christian and Traditional beliefs as part of their identity.⁷⁹ As such, their welcomes may be a compound of these values and the language associated with those traditions. Furthermore, BC municipalities trace the structure of their meetings from a British format, with concomitant elements such as starting with prayer. As Indigenous welcomes and territorial acknowledgements have become more popular, some municipalities seem to have attempted to fit a square peg into a round hole, rather than completely rethinking the structure of their meetings through the lens of reconciliation.

Presuming most municipal councils comprise, and are staffed by, people descended from settlers (as opposed to Indigenous communities), it is unsurprising to encounter what might be described as growing pains, as communities attempt to wade through the difficult task of reconciling the impact of colonial structures on practices and procedures. Ideally, municipal officials should work with local First Nations and Indigenous peoples to develop a welcome ceremony and/or territorial acknowledgement that honours and respects local indigenous traditions and participants. Municipalities should also ensure that their approach to reconciliation goes well beyond the inclusion of symbolic acts at inaugural meetings, and translates into substantive and progressive action and change.⁸⁰

⁷⁸ See for example Bradford, T., & Horton, C., Eds. (2016). *Mixed blessings: Indigenous encounters with Christianity in Canada*. Vancouver, BC: UBC Press; and see Watts, VA. (2016, September). “Re-meaning the sacred: Colonial damage and indigenous cosmologies.” Unpublished PhD Thesis, Queens University, Ontario, Canada; and Eshet, D. (2015). *Stolen lives: The indigenous peoples of Canada and the Indian Residential Schools*. Facing History and Ourselves.

⁷⁹ See for example Aboriginal Peoples Collection. (2006). “A matter of faith: A gathering of aboriginal Christians.” *Government of Canada*, APC 24 CA.

⁸⁰ See for example The Province of British Columbia and the Union of British Columbia Municipalities (UBCM) (2018, September 18). “Memorandum of understanding between the Province of British Columbia and the Union of British Columbia Municipalities on engagement with UBCM and local governments on treaty agreements, non-treaty agreements and Indigenous initiatives”; and City of Burnaby. (n.d.). “City service: Indigenous people.”

Conclusion

The *Saguenay* decision affirmed the state's duty of religious neutrality and underscored it by describing this duty as a democratic imperative. The decision did not simply apply to the municipality of Saguenay, Quebec, but rather to every municipal government across the country. As such, we should expect to see municipal councils adhering to the strictures established by the highest court in the land. Our research revealed that by including prayer as part of their inaugural meetings in 2018, at least 23 BC municipalities violated this ruling, and by extension the Canadian Constitution.

We are optimistic going forward, as a result of our research and correspondence with these municipalities, that fewer inaugural meetings will include a prayer and in so doing, be more inclusive. The findings of this study, however, highlight the need to verify compliance with court decisions, and the vital role of ongoing research into issues of the separation of religion and government. The BCHA will be sure to remind municipalities of their duty of religious neutrality prior to the next round of inaugural meetings in 2022, and carefully monitor compliance with *Saguenay* to ensure that no one, regardless of religious belief or lack thereof, is excluded from decision-making in BC.

Appendix I - Prayer Transcriptions

The minutes of inaugural meetings would typically include a brief description of the content of a prayer, rather than a full verbatim transcript. For example, the City of Langley minutes included the following:

“Mayor van den Broek invited Pastor Steve Nicholson, from Christian Life Assembly to deliver the Invocation. He expressed that it was his honour to be part of the Inaugural ceremony and congratulated the Mayor and members of Council on their success. He considered it a privilege to pray for the new leadership and wished them the best in the work they will undertake in leading the community.”⁸¹

We were able to transcribe a number of the prayers from audio/visual recordings of the meetings and found it useful to reproduce them here. The sample size is too small to allow for quantitative analysis of these prayers, but it is informative to include transcripts of the prayers where they are available, in order to provide readers with a sense of the type of content typically included in these kinds of prayers. The content of prayers included in municipal council meetings vary, but they display a distinct religious flavour and are often overtly Christian - evoking the name of Jesus/Christ - and praying to one god in particular.

City of Dawson Creek (pop. 12,978)

Reverend David Roch, Dawson Ministerial Association

Note: the audio for the prayer delivered at the 2018 inaugural meeting was no discernable, but it was delivered by the same person who delivered the prayer at the 2014 inaugural meeting. This prayer was audible, so we have reproduced it here:

“Morning, it’s a privilege to be here on behalf of the Dawson Creek Ministerial Association and as I was praying about this and thinking about it, I was reminded of the scripture. It says God raises one up and puts another one down so you’re in this position because God put you there and it’s a privilege to be there and thank you for serving thank you for serving. So let’s pray: Father God, we just lift up the Mayor and Council. We ask that you bless them, that you give them your divine wisdom, that you be with them, that you protect them, and as they serve our city. And God be with them, throughout the term. In Jesus’ name Amen.”⁸²

⁸¹ City of Langley. (2018, November 5). “Minutes of the inaugural meeting of the 39th council for the City of Langley held in city hall 20399 Douglas Crescent.”

⁸² City of Dawson 2014; and see City of Dawson 2018.

Township of Langley (pop. 25,888)

Pastor Derrick Hamre, Christian Life Assembly

“Let us pray a prayer of blessing upon the commitments made tonight. Heavenly Father, we thank you for the sincerity of the individuals standing before us. We thank you for their integrity. We thank you for their years of experience and their willingness to serve the Township of Langley. We pray now that you would empower them with knowledge, and wisdom, and discernment. We pray that you would help them to have listening ears and hearts that are open to people and topics as they come week by week. We pray that you would give them physical stamina and endurance. We pray that you would protect them and protect their families. We pray that you would bless them as they serve one another and serve our community. We pray these blessings in the name of Christ, amen.”⁸³

City of Nanaimo (pop. 90,505)

The Venerable Clara Plamondon, St. Paul’s Anglican Church

“Let us pray, gracious god and creator, we give thanks for this community of Nanaimo and for our ongoing relationships with the Snuneymuxw First Nation as we learn to walk together in this journey of reconciliation. We give thanks, Haitchka, for them and for the service of our outgoing mayor and members of council who have served our community this past term.

As we install our new mayor and members of council, we ask for God’s blessing to be upon each of them, may they be strengthened and inspired as they begin a new chapter of service in our community. May the decisions they make and the relationships that they cultivate be inspired by the hopes and dreams that we all have for our community. A community where all are welcome, where we are able to thrive and grow. Where families can live and work, and where there is commitment to a shared life and common good. Together let us make a commitment to work with and support each other in making this community a place we have imagined and longed for.

As we bless the work of our new council, we recognize that their work will only be accomplished with the cooperation of our whole community. We give thanks for all who contribute to the life of Nanaimo, including our municipal employees, business sector, service groups and charities, educators and faith communities, the arts and music. We celebrate the fact that we are a dynamic and diverse community, filled with talented people who are willing and eager to share their abilities. May we walk together in a spirit of joy, generosity and compassion. We ask these things in your gracious name. We pray. Amen.”⁸⁴

⁸³ Township of Langley. (2018, November 5). “Inaugural meeting of council.”

⁸⁴ City of Nanaimo. (2018, November 5). “The inaugural session of the 2018-2022 Nanaimo City Council.”

City of North Vancouver (pop. 48,196)

Pastor Alfred Esdaille (Lieutenant, Corps Officer), Salvation Army, North Vancouver Community Church

“Shall we pray. Oh God, creator of the heavens and earth, I stand here in your presence this evening to offer a prayer of blessings over these individuals, your servants who will dedicate their time and energy to the City of North Vancouver. May they conduct themselves always with integrity and honesty, always putting the affairs of the city first. When they seek your wisdom and guidance in the tough times, also in the good times, may they always be seen as people of high standards and mutual respect. May the City of North Vancouver be proud of the decisions and choices they have made and these elected. May the grace of our Lord Jesus Christ, and the love of god, and the fellowship of the Holy Spirit be with you all forever more. Amen.”⁸⁵

City of Parksville (pop. 12,514)

Pastor, Dr. Paul Hawks, Parksville Fellowship Baptist Church

“Let’s pray. Sovereign God, thank you for your concern for those who live in Parksville, evident today by your provision of this leadership for our community. We do pray now for those you have placed in authority over us. For Mayor Mayne and Councillors Fras, Greir, O'Brien, Patterson, Wilson. That you will give each of them wisdom and understanding in regards to the many issues that will come across their desks and patience for the many people that will come to them with ideas and concerns. When they make decisions, may they make them with equity, and fairness, and rightness.

Father, give them insight into the social and environmental of our community. Give them financial clarity, and an ability to make wise decisions in regards to the issue facing our community not just on matters of immediate concern but on matters that reach years into the future. I pray that this council will be known for its cooperative spirit and its cohesiveness as a team. That their individual experience and gifts and opinions would lead them to better clarity on the things that they will face and the solutions that they will need to find together. Make each of them good listeners of those that they serve. And we also pray for your [inaudible] your staff that will work alongside them, that their health and expertise on various matters would be welcomed, and then when decisions are made by this council that they would be given the resources and ability to carry them out in an expeditious manner.

I pray these things so that we, all the residents of Parksville, from the youngest to the oldest, might live peaceably and quiet lives. In Jesus’ name. Amen.”⁸⁶

⁸⁵ City of North Vancouver 2018.

⁸⁶ City of Parksville 2018.

District of Saanich (pop. 119,229)

Note: The District of Saanich included both a ‘blessing’ and a ‘multi-faith blessing.’

Multi Faith Blessing

Reverend Shana Lynngood, First Unitarian Church of Victoria

“As we gather hearts and minds and spirits together for the convening of this newly elected council, I invite you to join me now in a time of meditation, reflection, and prayer. Spirit of life and of love. Source of discernment and compassion. We pause at this moment of beginning to remember what is most central to why we are here.

Our lives can often be hectic and over full. So much so that we lose focus of what matters most. We are here each of us to live lives of meaning and of purpose. We are here to do our part in making this piece of the world that we inhabit as hospitable and sustainable and loving a place as we can. We acknowledge this evening that the work of building community takes all of us, elected leaders and engaged citizens. We know that we are at our best when we listen to one another. And so we ask that each council member might find that precious balance between listening within to individual conscience and listening to the wisdom and the insights of others. May their work together be guided by a sense of collaboration and possibility. May they always seek a path toward what is in the best interests of us all, the common good, which has sadly become increasingly uncommon.

Whatever issues and challenges may come, may they know that working together they can find humane and thoughtful solutions that can uplift us all and bring us together. So may it be, and amen.”⁸⁷

⁸⁷ District of Saanich 2018.

Blessing

Pastor Gary Bennett, Victoria Church of the Nazarene

“It’s a privilege for me to lead us all in a prayer of blessing on our new mayor and our council. Let’s pray together. Our father in heaven we come before you on this very special occasion, to ask your blessing on our newly elected mayor Fred Haynes, and our newly elected municipal council, Rebecca Mercereau, Colin Plant, Ned Taylor, Susan Brice, Zac de Vries, Judy Brownoff, Nathalie Chambers, and Karen Harper.

We pray that you would please grant each of them an abundance of vision and strength for the tasks of leadership that will come before them over the next 4 years. And may these elected representatives effectively serve and lead the people of Saanich with humility, wisdom, and compassion. We pray that you would fill them with resourcefulness and creativity. We pray that you would grant them tough skin to weather the storms of criticisms and scrutiny, but give them tender hearts. To respond with readiness to the true needs of our people. We pray your blessing on the municipality of Saanich, upon the seniors and the adults and young people and children who call this place home.

Those from diverse backgrounds who work and play and study and volunteer within her boundaries. May each one be blessed with a genuine love for neighbour, and may we all work together in ways that reflect your goodness, your grace, and your glory, and we pray this, in the name of Jesus. Amen.”⁸⁸

City of Victoria (pop. 92,141)

The Very Reverend Ansley Tucker, Christ Church Cathedral

“I want to call to mind a quotation of a 20th century theologian called Reinhold Niebuhr. He was a theologian and ethicist and he concerned himself frequently with the intersection of politics and public policy, ethics, and yes, because he was a theologian, religion. You may be familiar with a well known Christian text faith, hope, and love abide these three, but the greatest of these is love.

It was famously read at the funeral of Princess Diana and probably at many weddings that you have attended over the years. Niebuhr comments on these words in what I take to be a suitable charter for any organization, agency, or legislative body which is committed to the arduous task of magnifying the common good and he says this:

⁸⁸ *Ibid.*

“Nothing that is worth doing can be achieved in our lifetime; therefore we must be saved by hope. Nothing which is true or beautiful or good makes complete sense in any immediate context of history; therefore we must be saved by faith. And nothing we do, however virtuous, can be accomplished alone; therefore we must be saved by love.”

You ride on the shoulders of those who have gone before you. And stepped aside their work incomplete. And another generation will stand on yours. Your work will never be done but you will keep at it, that’s hope. No matter who you are or where you are perched or how long you’ve been there, none of you has the whole picture. You can only trust that your vision is worthy, that’s faith. No matter how smart how industrious or how resourced you are, none of you can do it alone. You need each other, that means love.

And so here is my blessing for you who have dared and been dared to accept public office and to now take your place amongst those who have given heart and mind and soul and strength to the well being of this city: May God your god fill you with hope, motivate you with faith, and bind you together in love. May you serve this community with wisdom, integrity, prudence, inquisitiveness, and courage. And may you have the gift of joy and fulfillment in the work that we have laid upon you. Amen.”⁸⁹

⁸⁹ City of Victoria. (2018, November 1). “Minutes - Inaugural meeting of Victoria City Council.”

Appendix 2 - Survey Letter to Municipalities

Subject: Survey on Municipal Prayers
March 5, 2019

To whom it may concern:

In 2015, the Supreme Court of Canada ruled that starting a municipal council meeting with a prayer violated the Charter of Rights and Freedoms. We're now surveying cities and towns across British Columbia to see what actions they've taken, if any, to comply with that ruling. It would help our research if you could answer our few questions below.

By way of background, in *Mouvement Laïque Québécois v Saguenay*, the Supreme Court of Canada ruled that the City of Saguenay, Quebec's practice of beginning council meetings with the Lord's Prayer (and later a nondenominational prayer) violated the "state's duty of religious neutrality." This duty arises from every Canadian's right to freedom of conscience and religion and the multicultural nature of our society.

1. Does the municipality begin council meetings with a prayer or invocation?
2. If so:
 - a. When was the policy implemented (if known)?
 - b. Is the prayer led by the mayor, a councillor or an invited official(s)?
 - c. If the municipality has a standard prayer, please include a copy of the text.
 - d. Provide a link to the municipality's policy on council prayers.
3. If not:
 - a. Did the council previously begin meetings with a prayer?
 - b. Did the council implement changes as a result of the Saguenay ruling? If so, please describe any changes implemented.
4. Feel free to include any other information that might be relevant.

You can answer these questions by email or online at:

https://www.bchumanist.ca/municipal_prayers_survey

Thank-you for your assistance.

Yours sincerely

Ian Bushfield
Executive Director
BC Humanist Association

Appendix 3 - Letters to Municipalities with Prayer in Inaugural 2018 Meetings

Subject: Unconstitutional prayer/invocation at 2018 inaugural session

January 22, 2020

To the XXX

In 2015, the Supreme Court of Canada ruled that it was unconstitutional to begin a municipal council session with a sectarian prayer as it violated the state's duty of religious neutrality.

However, in reviewing the minutes of your City's 2018 inaugural session, we note that a religious representative provided an invocation or prayer.

We kindly ask that you confirm that your council will take steps to ensure future inaugural sessions are compliant with the Supreme Court's ruling.

Sincerely

Ian Bushfield
Executive Director
BC Humanist Association

Reference: *Mouvement laïque québécois v. Saguenay (City)*, 2015 SCC 16, [2015] 2 S.C.R. 3

July 21, 2020

Dear City XXX

I wanted to follow up on my previous correspondence to see if the District has changed or will be changing its policies prior to the next inaugural session.

Sincerely,

Ian Bushfield
Executive Director
BC Humanist Association

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