

# ELIMINATE HATE: HATE CRIMES AND HATE SPEECH IN CANADA

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## **Abstract**

The prevalence of hate speech and hate-motivated crimes in Canada can be attributed to the systemic failures of Canadian laws. These laws have historically condoned ill treatment towards minorities and minimal changes have been made to remedy this. An examination of how Canadian criminal law defines hate speech and hate-motivated crimes will provide a better understanding of how the current legal framework inadequately addresses it. An analysis of the current state of affairs and real-world implications will provide information on statistics and consequences. Particular attention is focused on several minority groups who face the consequences of these crimes. More research should be conducted focusing on the effects of hate speech and crime on victims and their mental health. Moreover, additional research determining causal linkages between hate speech and serious violent incidents of hate crimes would better solidify the need to address hate speech more seriously.

## **Introduction**

The Canadian criminal justice system has an insufficient legal framework to adequately address the consequences of hate speech and hate crime. Not only does hate speech violate fundamental human rights of individuals and groups, it has the potential to escalate to a hate-motivated crime, that may cause mental and physical harm to the victim (Chetty & Alathur, 2018). The *Criminal Code of Canada* does not appear to provide a sufficient response to the prevalence of hate-motivated crimes and hate speech. Moreover, systemic failures contribute to further discrimination and the perpetuation of greater disadvantages for marginalized populations (Perry, 2015). This paper defines hate crime and hate speech, provides a status update on the current hate crime statistics in Canada, outlines the relationship between policies and real-world implications, and examines who is affected by hate crime and hate speech. This paper will also explain what can be done to address the prevalence of hate speech and hate crime, and recommendations on what can be done further.

## Hate Speech and Hate Crimes Defined

Before an analysis of hate speech and hate crime can be conducted, it is prudent to define this phenomenon. Perry (2015) has defined hate crime as behavior typically targeted at a marginalized group that consists of acts of violence or intimidation. Additionally, it is a means for establishing domination and power over a victimized group. Perpetrators of hate crimes are motivated by a perceived threat from a subordinate group that often involves a competition for resources and opportunities (Perry, 2015). According to Chetty and Alathur (2018), hate speech is any speech intended to hurt or disrespect an individual or group based on the identity or perceived identity of the victim(s). Often stereotypes are embedded in these statements. Hate speech can exist independently of hate-motivated crime, but generally, hate crime will contain elements of hate speech (Chetty & Alathur, 2018). Hate-motivated crimes possibly originate from shared ideas communicated via hate speech, using a variety of platforms, such as social media, to spread the word. The purpose of spreading these messages is to foster fear and evaporate the voices of those with minimal protection from the law.

## Current State of Hate Crime in Canada

In Canada, the calculation of hate crime depends on two factors, incidents that are reported or come to the attention of the police and crimes that the police determine are motivated by hate (Statistics Canada, 2019). According to Statistics Canada (2019), hate-motivated crimes are down by 13% in 2018 compared to 2017 but have consistently increased each year since 2009. In 2017, there were 2,073 police-reported hate crimes compared to 1,798 reported in 2018 (Statistics Canada, 2019). The types of motivation included race/ethnicity, religion, sexual orientation, language, disability, sex, age, and other factors. The top three overall motivations for hate crime are: race or ethnicity, which resulted in 780 incidents, religion, which resulted in 639 incidents, and sexual orientation, which resulted in 172 incidents (Statistics Canada, 2019).

According to Abedi (2018), Canada's Criminal Code does not acknowledge 'hate crime'. Section 718.2 of the *Criminal Code of Canada* acknowledges hate motivation in the commission of an offence, this provides a judge with the ability to factor hate motivation as an aggravating factor in sentencing (Abedi, 2018). A hate-motivated crime must include an actual crime and evidence of bias or hatred towards the victim(s) (Abedi, 2018). In Canada, the percentage of hate speech charges is low, which may not be an accurate reflection of the actual number of hate speech incidents. Police are charged with the responsibility of determining whether a crime was motivated by bias or hate, and the charge needs to be

approved by the province's attorney general (Abedi, 2018). The definition of what constitutes hate or bias may vary across police departments, which results in an inconsistent picture of the prevalence of hate-motivated crimes in Canada.

Sections 318, 319(1), and 319(2) of the *Criminal Code of Canada* address the consequences for hate speech (Abedi, 2018). Section 318 refers to advocating for genocide, which is defined as the killing of members of an identifiable group and/or deliberately inflicting conditions that will bring physical destruction of the identifiable group (Government of Canada, 2019a). As defined by the *Criminal Code of Canada*, "an identifiable group is any section of the public distinguished by color, race, religion, national or ethnic origin, age, sex, sexual orientation, gender identity or expression, mental or physical disability" (Government of Canada, 2019a, p. 348). Section 319(1) and (2) refer to public incitement and willful promotion of hatred (Government of Canada, 2019a). Everyone, if found guilty, who communicates statements in a public space that provokes hatred or willfully promotes hate against an identifiable group, where it will likely lead to a breach of the peace, may face imprisonment (Government of Canada, 2019a).

Section 13 of the *Canadian Human Rights Act* pertains to the protection from hate speech communicated via telephone or the internet (Platt, 2019). However, this provision was repealed in 2013 by Stephen Harper and the Conservative government, as it infringed on the *Charter of Rights and Freedoms* (Platt, 2019). Due to the prevalence of hate speech found on social media, a revision of Section 13 has recently been discussed. The Conservative government has argued the courts and the Criminal Code are responsible for dealing with hate speech and hate crimes. According to Abedi (2018), only one-third of police-reported hate crimes resulted in charges and, therefore, two-thirds of victims did not report. It is agreed that the former provision is seemingly vague, but it is important to balance the ways in which freedom of speech should be limited, to protect other freedoms that are identified in the *Canadian Charter of Rights and Freedoms*.

The Government of Canada has dedicated funding each year through Public Safety Canada, to specific communities for enhancing protection against victimization (Public Safety Canada, 2019). Communities that have a history of victimization by hate-motivated criminal activity may be eligible for funding to increase security measures, such as the installation of cameras, alarms, and other safety equipment. It may also be used for community services provided to specific groups for education and social activities, as well as for basic training for staff in response to a hate-motivated incident. As an example, according to the Mena Report (2019), a Russian-speaking Jewish community in Toronto

received \$31,749 in federal funding for a non-profit agency that supports community services for this particular group.

The Security Infrastructure Program supports protection for vulnerable communities; however, the provisions are limited. The program criteria may preclude groups from receiving funding based on ineligibility or not being selected (Public Safety Canada, 2019). Applications for funding are only accepted twice a year, which does not provide a rapid response to a hate-motivated crime that may occur outside of those application deadlines. There is only four million dollars available for funding, and proposed projects may only receive up to 50% of the required costs to upgrade safety measures (Public Safety Canada, 2019).

From the lens of the routine activity perspective of crime, the Security Infrastructure Program is a method of crime reduction by making changes to environmental design (Cohen & Felson, 1979). Essentially, the victims of hate-motivated crimes are responsible for doing more to protect themselves from the perpetrators of those crimes. The application process may also further contribute to the harm, such as damage experienced by a particular community, especially if the request for funding is denied (Cohen & Felson, 1979). Additionally, the Security Infrastructure Program provides a response to hate-motivated crime, as if it is an inevitable and unavoidable phenomenon. It does very little to hold perpetrators of hate-motivated crime accountable for their actions. As a result, routine activity theory and the Security Infrastructure Program does not adequately address hate-motivated crime in Canada.

### **The Relationship Between Research, Policies and the “Real World”**

Neller (2018) argued that the way in which hate crime is addressed by the criminal justice system can be discriminatory in and of itself. There is a tendency to rank the pain and suffering of others in a hierarchy. This is problematic for a number of reasons. The term “balkanization” describes how individuals and groups are encouraged to view themselves as competing groups and uses identity to create a division among communities (Neller, 2018). Anti-hate legislation reform typically occurs with the persistence of specific lobby groups, so laws only protect a select group of people, leaving other groups vulnerable to attack. Additionally, if an individual or group does not fit into a particular category or the prevalence of violence towards them is relatively unheard of or unknown, they may not receive protection from the law. Conversely, if a group or individual is perpetually viewed as a victim, this may disempower them and reinforce patriarchal laws. Despite differences, there is a shared experience of oppression

that would be better served to unite individuals and groups in solidarity against injustices (Neller, 2018).

Chetty and Alathur (2018) also agreed that legislation, policies, and systemic failures are responsible for preserving the prevalence of hate crimes and therefore, do more to protect the identities of the aggressors than the targeted individuals or groups. In Canada, there are laws and policies that have historically and currently oppressed minorities, women, expressions of sexual orientation, and expressions of religion. State sanctioned subjugation has made it comfortable for individuals and groups to engage in hate crime. Even with legislative reforms, there continues to be residual damage from the harms done as evidenced in the number of violent incidents that are motivated by hate, which will be later explained.

It is problematic to solely rely on Canada's current legal framework to address hate-motivated crimes, because the number of police-reported incidents are not significant indicators of the actual number of hate crimes in Canada. According to Newark (2018), there is a discrepancy between the actual number of crimes committed and the number of crimes reported. Underreporting can give the misconception that crime rates are down. Within a marginalized population, the members may be hesitant to report hate speech and hate crimes to the police for a variety of reasons. An individual that has experienced negative interactions with the authorities may be uncomfortable asking the police for help. Negative consequences for the victims of hate crime may also include fear of retaliation from the perpetrator or a fear that nothing will or can be done to abate the attacks (Newark, 2018). Moreover, from a victim-devaluing perspective, groups that have not had a negative experience with law enforcement, have a higher likelihood of utilizing those resources, whereas groups who have experienced further victimization from law enforcement, are less likely to report hate crimes (Walfield, Socia, & Powers, 2016). If there are no improvements to the systemic injustices and there continues to be no changes in Canada's current hate speech and hate crime laws, these types of crimes will continue to flourish.

It can be difficult to differentiate between hate speech as defined by the *Criminal Code of Canada* and negative comments that are unaccepting of race, culture, gender, sexual orientation, and religion, among others. Freedom of speech is protected under the *Canadian Charter of Rights and Freedoms*, but there are reasonable limits to that protection (Chetty & Alathur, 2018). The purpose of reasonable limits to freedom of speech is to promote peaceful relationships between various cultural, religious, and racial groups in Canada, and to prevent disturbances to public order (Tomlins, 2013). However, when the limits and

freedoms come into conflict, it is difficult to determine which is more deserving of protection. Criticisms of Section 13 of the *Canada Human Rights Act* originated from the idea that state intervention would prioritize one group's values and beliefs over another's, thereby marginalizing the latter group. It is important to recognize the protection of the right to freedom of speech and a deliberate act of hate speech motivated by the desire to provoke anger and incite violent behavior.

Amid the literature and laws globally, in particular the United States and Europe, there are varying definitions of what constitutes hate speech and how to address it (Bleich, 2011). In the United States, hate speech is protected under freedom of speech, however, almost every state has enacted a form of hate crime law. These laws are based on the notion that hate crimes inflict harm not only to the individual, but to society at large (Bleich, 2011). In Germany, the importance of dignity, honor, respect, and civility is weighed against the right to freedom of expression, with particular attention to the harmful speech that would threaten those values (Bleich, 2011).

Hate speech should be taken more seriously by the Canadian criminal justice system, the Canadian government, and the various communities. According to the research, hate crimes tend to originate from what is considered a minor crime and have the potential to escalate (Walfield, et al., 2016). These minor crimes often occur on multiple occasions before they are reported or increase in severity. It is difficult to determine the exact numbers for certain hate crimes, as research is relatively recent regarding religious motivated hate crimes, and hate crimes committed against the LGBTQ2+ community in comparison to research regarding hate-motivated crimes against specific racial and ethnic groups. Differentiating between the veracity of offline and online hate speech and threats are difficult for victims. Regardless of whether an individual will follow through with a threat of harm, the damage can be long-lasting for targeted groups (Walfield, et al., 2016).

Although hate-related crimes comprise a small number of reported crimes in Canada, statistics have shown it is on the rise (Abedi, 2018). According to Chetty and Alathur (2018), a small proportion of the population uses social media and technology to spread hate speech and ideology. The internet has made it possible to utilize a cloak of anonymity to protect one's identity and intentions.

Technology and social media can be useful tools for creating positive social networks to connect people from all over the world. There are also a number of groups that use these tools for spreading messages of hate (Canadaland, 2019).

They have the ability to disguise themselves to avoid detection. The Yellow Vests Canada group is a far-right grassroots movement that originated in France in response to certain social and economic policies enacted by French President Emmanuel Macron (Canadaland, 2019). In Canada, around December 2018, this model was adopted to protest perceived injustices regarding employment, largely blamed on mass immigration. Amongst this group, there was a collective sentiment that democracy is at risk and that illegal immigration must be stopped (Canadaland, 2019). On the surface, Yellow Vest Canada appeared to conduct peaceful protests against the government. An Edmonton recruit later discovered the true intentions and motivations behind Yellow Vest Canada. In response, this recruit developed Yellow Vest Canada Exposed to monitor the messages and actions of this particular group (Canadaland, 2019). Yellow Vest Canada has claimed they are not racist; nevertheless, Yellow Vest Canada Exposed has claimed they have proof of racist sentiments, as well as death threats and intimidation towards those who threaten to expose them (Canadaland, 2019).

Yellow Vest Canada is just one example of an extreme right-wing protest movement with a xenophobic sentiment. According to the Canadian Anti-Hate Network (2018), there are over 300 right-wing extremist groups in Canada. These groups promote various types of intolerance that include racism, sexism, hate towards religion, Indigenous populations, the LGBTQ2+ community, and the differently-abled community. It is the work of organizations such as the Canadian AntiHate Network, that expose the harmful and violent intentions of these hate groups.

### **Who is Affected by Hate Crime and Why Does it Matter?**

Regardless of who you are, hate speech and hate crime can affect everyone. According to Perry (2015), there are five types of harm in relation to hate crimes; she acknowledged that the harms outside an individual's perspective are speculative, as there is minimal research available to suggest how they affect communities and social values. Bleich (2011) argued that hate crimes cause greater societal harms and injury to the individual and community compared to regular crimes.

Perry (2015) suggested that the initial harm that is experienced by the victim may be physical injury or suffering, but it may also include

psychological and emotional turmoil for the individual. Second, there is the harm to the group that the victim belongs to. There are harms associated outside of the victim's immediate neighborhood and there is the harm that may be targeted towards global communities, societal norms, and values (Perry, 2015). Groups outside of the victim's immediate vicinity may become hypervigilant following an attack or extremely violent event. The following sections will provide a closer examination of the causes and effects of hate speech and hate crime on some specific groups.

### **Minorities, Immigrants, and Indigenous Peoples**

Chetty and Alathur (2018) argued that the government contributes to the prevalence of racist hate speech based on the messages they deliver through systems and policies that exert power over certain groups. In Canada, immigration laws were and presently are arbitrary and discriminatory (Perry, 2015). Historically, these policies sent a clear message that groups from specific racial backgrounds were not welcome in Canada. The *Multiculturalism Policy* of 1971 was intended to embrace the diverse nature of the Canadian population and protect the unique identities of everyone. Nevertheless, this policy did not guarantee fair treatment. Competing Canadian laws, such as *The Indian Act* of 1876, discriminated and permitted inequality (Day, 2018).

Canadian laws have consistently excluded First Nations, Métis, and Inuit Peoples from enjoying equal status under the law (Day, 2018). *The Indian Act* of 1876 not only allowed the federal government to exercise power over First Nations people, it also sanctioned the genocide of their culture. Canadian policies are also responsible for the extreme levels of violence and murder perpetrated against Indigenous Peoples, women, and girls in particular. According to the 2015 *Missing and Murdered Indigenous Women and Girls in BC Report*, underlying discrimination in the law needs to be addressed to fight violence against women (Day, 2018). Indigenous women and girls have endured decades of gender discrimination, as policies have long endorsed second-class citizenship by denying status and equal rights compared to their male counterparts (Day, 2018).

### **Faith Communities**

Following race and ethnicity, hate-motivated crimes towards faith communities rank as second in Canada (Statistics Canada, 2019). Unfortunately, a breakdown of the prevalence of hate crimes towards a specific religion is not documented. Hate crimes amongst communities of faith range in severity from hate speech towards individuals to graffiti and massacres at places of worship. The Tree of

Life Massacre in Pittsburgh is one example of the extreme violence and carnage that hate crime can breed (Lieberman, 2019). Irrespective of whether a hate crime includes physical injury and violence, the effects can be long-lasting and detrimental (Walfield et al., 2016). Victims may experience anxiety, depression, and other related mental health concerns. The escalation in severity of hate crime may cause individuals to fear for their safety and retreat into isolation.

Islamophobia has increased online, especially within the social media context (Chetty & Alathur, 2018). Muslims are demonized and often depicted as violent, which is considerably more prevalent following a terrorist attack. Mosques are vandalized and individuals endure threats to their safety. Members of faith communities no longer feel safe enough to worship freely when their right to practice religion is under attack (Chetty & Alathur, 2018). Members of faith communities have arguably lost trust in law enforcement and are unlikely to report an incident of hate speech or hate crime, if they believe the police cannot or will not help (Walfield et al., 2016).

### **LGBTQ2+ Community**

The harms experienced by the LGBTQ2+ community are not sufficiently researched as protection was not afforded to this community until relatively recently (Hein & Shriner, 2013). In Canada, sexual orientation was criminalized prior to 1969, but has since been included as a protected category under the law (Government of Canada, 2019b). Due to the inequalities enforced by Canadian law, members of the LGBTQ2+ community were not seen as equal in Canadian society. In 1996, sexual orientation was included under the *Canadian Human Rights Act* as one of the banned grounds for discrimination (Government of Canada, 2019b). Same-sex marriage was not legal in Canada until 2005 (Government of Canada, 2019b).

Hein and Shriner (2013) argued that hate-motivated crimes typically lack provocation and victims are more likely to experience serious physical injury. Specifically, in the LGBTQ2+ community, victims may lack support to cope with verbal and physical attacks if they have been renounced by their familial network. Research suggested that the risk of depression, anxiety, PTSD, diminished self-worth, and potential for suicide increased in these cases (Hein & Shriner, 2013). It was also recognized that transgendered individuals experienced inequality before the law and did not feel that there was legal recourse for hate crimes targeted towards them (Hein & Shriner, 2013). The lack of protection experienced for so many years demonstrates how a group can be vulnerable to attack, without the legal ramifications to deter perpetrators. Furthermore, because

this group was not protected, there are few statistics on the prevalence of hate crime experienced by this community. Additionally, any statistics gathered have been summarized under one category. Outcomes of hate speech and hate crime for the LGBTQ2+ community require more recent research so that proper interventions and supports can mitigate the deleterious effects.

## **Women**

In society, traditional views of women have bred hatred towards them (Chetty & Alathur, 2018). Laws that have prevented women from participating equally and fully in the workforce and in decision-making, have entrenched a view of women, as being inferior to men. The level of oppression has generally been worse for women of color, particularly Indigenous women and girls (Day, 2018). As previously mentioned, Indigenous women and girls went missing or were murdered at catastrophic numbers before an inquiry was conducted and taken seriously by the federal government (Day, 2018). Laws that criminalize women or treat them as inferior send the message that violence towards women is condoned and accepted.

## **What Can Be Done?**

Although hate crimes comprise a small proportion of all reported crime in Canada, it is suggested that hate crimes are on the rise in recent years (Abedi, 2018). It is difficult to determine what factors have influenced this increase. Hate crimes are typically less likely to be reported by victims if they do not believe justice will be served (Walfield et al., 2016). It is arguable that the data is not an accurate reflection of the Canadian state of affairs since the data only reflects the number of police-reported hate crimes (Armstrong, 2019). If there is an increase in the reporting of hate speech and hate crimes, it may be attributed to heightened awareness following a high-profile incident (Armstrong, 2019). Perhaps increased exposure on social media platforms and global attention to the matter has encouraged more people to report; however, beyond speculation, more research is required to determine whether this is a factor.

Increasingly, police services in Canada have dedicated more resources such as designated officers and special units, to identify hate crime (Armstrong, 2019). By providing specialized training and improving the abilities of law enforcement to identify hate crime, this will likely improve public confidence in reporting. The collection of data on complaints of smaller nuisances, such as racial slurs or graffiti, can identify trends that may connect to more serious incidents of crime.

Being information-led is an important principle in police-based crime reduction (Cohen, Plecas, McCormick, & Peters, 2014).

Despite the inability of the *Criminal Code in Canada* to deal with hate crime and hate speech, there are strategies that can be used to reduce the number of incidents. The designation of businesses, workplaces, and schools as safe and inclusive spaces can discourage people from engaging in hate speech and hate crime (Abedi, 2018). Non-government agencies and nonprofit organizations have made it easier for people to report hate crime through the use of websites and social media platforms (Armstrong, 2019). Community members volunteer and dedicate their time to identify and expose hate speech and hate crime. Perhaps nontraditional methods of reporting and increased awareness can assist in reducing the number of incidents that occur because it demonstrates that hate speech and hate crime are not tolerated in a given community or place. It is hoped that this can provide an opportunity for victims to be empowered and discourage perpetrators.

### **Conclusion**

Prosecuting hate speech and hate crime in Canada remains a difficult task. The lack of a clear definition and the current weak legal framework to address it is one of the challenges that victims and law enforcement face. Bleich (2011) argued that values, such as community cohesion, civility, dignity, and equality need to be considered when weighing the right of freedom of speech against the potential harms it can cause. The systemic injustices that continue to infect Canadian laws are, in part, responsible for condoning inequality and poor treatment of women, minorities, immigrants, faith communities, and members of the LGBTQ2+ community among others. Perhaps Canada seeks protection behind the veil of multiculturalism to justify a lack of action towards legal reform. Despite this, communities have the ability to come together in solidarity and take action. More research and resources should be dedicated to identifying how hate speech and hate-motivated crimes affect the mental health of those who are targeted. It is imperative that more research is conducted and data is collected to identify linkages of minor incidents of hate-motivated crime to more serious and violent events, to prevent them from happening in the future.

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