SCC Number: 37833

IN THE SUPREME COURT OF CANADA

(ON APPEAL FROM THE COURT OF APPEAL OF THE PROVINCE OF ONTARIO)

BETWEEN:

HER MAJESTY THE QUEEN

APPELLANT
(Appellant)

and

RYAN JARVIS

and

RESPONDENT
(Respondent)

SAMUELSON-GLUSHKO CANADIAN INTERNET POLICY AND PUBLIC INTEREST CLINIC
PRIVACY COMMISSIONER OF CANADA
CANADIAN CIVIL LIBERTIES ASSOCIATION
ONTARIO COLLEGE OF TEACHERS
INFORMATION AND PRIVACY COMMISSIONER OF ONTARIO
WOMEN'S LEGAL EDUCATION AND ACTION FUND INC.
ATTORNEY GENERAL OF BRITISH COLUMBIA
CRIMINAL LAWYERS' ASSOCIATION (ONTARIO)

INTERVENERS

FACTUM OF THE INTERVENER
ATTORNEY GENERAL OF BRITISH COLUMBIA
Rule 42, *Rules of the Supreme Court of Canada*

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PART I – OVERVIEW AND STATEMENT OF FACTS

1. Modern technology challenges individual efforts to maintain personal privacy. Many individuals willingly share their most intimate details using social media. Others attempt to protect their personal information, be it financial or social. Participation in the modern world substantially diminishes the ability of any individual to truly safeguard their privacy. Security cameras are a fact of life, typically installed by both private entities and public bodies for the purpose of protecting property or public safety. Individuals must often enter premises monitored by video surveillance. Mere day-to-day tasks are routinely the subject of detailed, semi-permanent records in high-definition video. Against this backdrop, Parliament has sought to protect Canadians against the misuse of such technology for criminal purposes.

2. This appeal deals with how to interpret the phrase "reasonable expectation of privacy" within the voyeurism offence (s. 162(1)) of the *Criminal Code*. The legal test for a reasonable expectation of privacy within s. 162(1) must take into account the realities of modern technology, while preserving an individual's right to limit access to sexual imagery of themselves. The test must be consistent with that developed under s. 8 of the *Charter of Rights and Freedoms*.

3. The issues herein go beyond the factual matrix of this case. Whether or not the students had a reasonable expectation of privacy in the circumstances of this case must be assessed utilizing the framework for analysis employed in the s. 8 jurisprudence. A contextual and normative analysis is required rather than the location-based test employed by the majority of the Ontario Court of Appeal. Mere presence in a "public" place cannot be a waiver of an individual's right to limit other's photographic access to their breasts or sexual organs.

4. The Attorney General of British Columbia ("AGBC") submits that the test for whether there was a reasonable expectation of privacy should employ the well-established framework found in the s. 8 jurisprudence. An individual's expectation of privacy as against state intrusion will always be different than an individual's expectation of privacy as against another individual. That distinction can be readily addressed by the normative approach already established. An individual must expect that their image may be captured in public places as a facet of modern life. There is no logical basis to extend this to close-up imagery of intimate parts of a person's body.

5. The AGBC agrees with and adopts the Appellant's overview and statement of facts.

PART II – INTERVENER'S POSITION ON APPEAL

6. The AGBC intervenes to address the necessity of employing the analytical framework of s. 8 jurisprudence in assessing the reasonableness of an individual's expectation of privacy.

7. The specific issue raised by the appellant in this case is: *"Did the majority of the Court of Appeal err in concluding holding that the visual recordings of students were not made in circumstances that give rise to a reasonable expectation of privacy as required by s. 162(1) of the Criminal Code, R.S.C. 1985, c. C-46*?" [1]

8. The AGBC submits that the appropriate test for determining if the circumstances gave rise to a reasonable expectation of privacy is the one utilized in the s. 8 *Charter* jurisprudence – a contextual, normative assessment that takes into account the totality of the circumstances.

PART III – STATEMENT OF ARGUMENT

A. The Voyeurism Offence

9. Section 162(1) of the *Criminal Code* criminalizes the observation or recording of persons in the circumstances outlined in subsections (a) through (c) where the observation or recording is surreptitious and is made in circumstances giving rise to a reasonable expectation of privacy.

10. Parliament expressly chose to use the language employed in the section - it must be presumed to have done so purposefully and fully cognizant of this Court's jurisprudence that informs its content and meaning.

B. Reasonable Expectation of Privacy and Section 8 of the *Charter*

11. The crux of the analysis under s. 8 of the *Charter* was set out by Dickson J. in *Hunter v. Southam Inc.*[2]:

> ... an assessment must be made as to whether in a particular situation the public's interest in being left alone by government must give way to the government's interest

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[1] *Appellant's Factum*, para. 19.
[2] [1984] 2 S.C.R. 145.

in intruding on the individual's privacy in order to advance its goals, notably those of law enforcement: pp. 159-60.

12. Over the years, the analysis has been adapted to and considered in evolving circumstances including the advent of modern technology. The jurisprudence has established that a reasonable expectation of privacy is to be determined on the basis of the totality of the circumstances.[3]

13. In *R. v. Edwards*, Cory J., writing for the majority, found that the right to be free from intrusion or interference is a key element of privacy. As the appellant in *Edwards* could not establish that he was any more than a privileged guest in the home that was searched, he was not able to establish that he had a reasonable expectation of privacy in that home: p. 147.

14. The expectation of privacy is a normative rather than a descriptive standard.[4] Privacy is a concept laden with value judgments which are made from the independent perspective of the reasonable and informed person[5], and which is highly dependent on a number of case specific factors that inform and shape its contours within the broader normative context. It concerns a balance between the "societal interests in protecting individual dignity, integrity, and autonomy with effective law enforcement".[6]

15. In *R. v. Cole*[7], this Court assessed the reasonableness of a teacher's expectation of privacy in information stored on a school-board supplied computer. Fish J., writing for the majority, observed that a reasonable though diminished expectation of privacy is nonetheless a reasonable expectation of privacy: para. 9. The context in which the personal information was stored on the workplace computer was deemed relevant to the analysis. That context included the policies, practices and customs of the workplace: para. 52. In *Cole*, the workplace policies militated both for and against finding the teacher had a reasonable expectation of privacy in the personal information stored on the Board's computer. This Court concluded that the teacher did maintain an objectively reasonable expectation of privacy. Notably, Fish J. also concluded that the search of the work computer by the school principal did not result in an infringement of s. 8 of the *Charter*,

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[3] *R. v. Edwards*, [1996] 1 S.C.R. 128, p. 145; *R. v. Wong*, [1990] 3 S.C.R. 36, p. 62.
[4] *R. v. Tessling*, 2004 SCC 67, [2004] 3 S.C.R. 432, para. 42.
[5] *R. v. Patrick*, 2009 SCC 17, [2009] 1 S.C.R. 579, para. 14.
[6] *R. v. Plant*, [1993] 3 S.C.R. 281, p. 293.
[7] 2012 SCC 53, [2012] 3 S.C.R. 34.

as the principal had a statutory duty to maintain a safe school environment which permitted the search and seizure on reasonable grounds: para. 62.[8]

16. Recently, this Court considered the expectation of privacy in an "electronic conversation".[9] Writing for the majority of this Court, McLachlin, C.J. held that control is not an absolute indicator of a reasonable expectation of privacy, nor is lack of control fatal to a privacy interest – it is one element to be considered in the totality of the circumstances: para. 38. Individuals exercise meaningful control of information by making choices about what, how and when information about them is communicated to others: para. 39. Moldaver J., writing for himself and Côté J., in dissent observed that an individual may have a reasonable expectation of personal privacy in the subject matter in one context, but not in another: para. 117.

17. Thus, the s. 8 jurisprudence employs a flexible and adaptive framework that requires a contextual assessment of the totality of circumstances in determining the reasonableness of an expectation of privacy. This framework can and should be applied in interpreting "reasonable expectation of privacy" in s. 162(1) of the *Code.* Indeed, there is no principled basis in law or policy to do otherwise.

C. <u>The statutory provision should be interpreted utilizing the *Charter* jurisprudence</u>

18. The location-based assessment utilized by the majority of the Ontario Court of Appeal fails to accommodate the nuanced and multifactorial character of a *reasonable* expectation of privacy, which constitutes the very essence of the inherently normative concept. It does not account for important considerations such as the governing school policies; the particular vulnerability of students; the existence of privacy legislation; and the difference between observing by the naked eye and recording via a surreptitious camera (or possibly with telephoto capabilities observing more than the naked eye could). The "totality of the circumstances" test articulated in the s. 8 jurisprudence ensures that these and all other relevant factors are considered in determining whether the subject of surreptitious observation or recording had a reasonable expectation of privacy. A different legal standard for assessing the reasonableness of an expectation of privacy within s. 162(1) is not only likely to add confusion and uncertainty to the law, but would serve to

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[8] See also *R. v. M. (M.R.),* [1998] 3 S.C.R. 393, para. 33.
[9] *R. v. Marakah*, 2017 SCC 59, [2017] 2 S.C.R. 608.

undermine the "protean" nature of privacy expectations reflected by this Court's unwavering commitment to an examination of all meaningful circumstances in determining both their existence and objective reasonableness.

19. Very few courts have considered the interpretation of s. 162(1). In *R. v. Rudiger*[10], Voith J. concluded that the s. 8 jurisprudence should be treated with considerable caution in construing s. 162(1), finding principles which inform the interpretation of a *Charter* provision are fundamentally different from those governing interpretation of the *Code*: para. 82. Nevertheless, despite observing that s. 8 principles should be viewed with caution in interpreting s. 162(1), Voith J. drew on *Charter* jurisprudence to inform his analysis of whether the subjects had a reasonable expectation of privacy.

20. A location-based assessment, relying solely on the quasi-public location and the presence of security cameras, does not permit a proper analysis of whether the students recorded by the respondent had a reasonable expectation of privacy. It does not provide a principled basis for analysis in future cases considering different circumstances. A test that takes into account the totality of the circumstances allows for the consideration of all relevant factors. These factors will necessarily vary depending on the circumstances of the case.

D. The Totality of the Circumstances – Factors to Consider

21. Social and economic life creates competing demands – the community wants privacy, but it also insists on protection: *Tessling*, para. 17. The public school environment epitomizes the challenge of attempting to meet these competing demands. The balancing exercise includes the need to promote a safe environment, both physical and social, while protecting the dignity and autonomy of students at the same time. Security cameras are typically employed to assist in maintaining the physical security of students as well as the protection of school property. The school policies that often accompany such surveillance seek to minimize its impact on the privacy interests of those recorded by restricting use, access and retention of the recorded information.[11]

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[10] 2011 BCSC 1397.

[11] See for example: *Policy #7.80 Video Surveillance*, Burnaby Board of Education, School District 41; *Policy 608: Video Surveillance*, North Vancouver School District; *Policy 645R-Video Surveillance Closed Circuit Television (CCTV) (Regulations)*, School District No. 23 (Central Okanagan); *Policy 3517.3 Security- Video Surveillance at School Sites*, Greater Victoria

Some school boards also have policies that restrict the use of personal electronic devices and some require consent for the use of any photographs or other media.[12]

22. Furthermore, most provinces have privacy legislation that governs the use of personal information by both private entities and public bodies.[13] The impact of modern technology, and particularly video surveillance, on privacy interests has long been recognized.[14] As a result, the Office of the Information & Privacy Commissioner for British Columbia has published *Public Sector Surveillance Guidelines*[15]. Many of the previously cited school board policies follow these guidelines as do other public bodies.[16] This Court has also recognized that the objective of providing an individual with some measure of control over his or her personal information is "intimately connected to individual autonomy, dignity and privacy" which are self-evidently significant social values.[17]

23. The mere fact that what was recorded may be visible to others in the same quasi-public space is only one factor to be considered, and standing alone, it is readily apparent how little it says about the other significant ways in which privacy can be impacted. As noted in *R. v. Sandhu*[18], "it is inapt to assess the expectation of privacy in the hallway against the possibility that another person could pass through the hallway at any time": para. 45. This is so because the camera captures

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School District; *Procedure PR.615.FAC Video Surveillance*, Ottawa-Carleton District School Board.

[12] *X.X. Student Photography/Video and Media Consen*t, Revelstoke Board of Education Policy Manual; *Regulation 1300 GVSD Web Page Publishing Regulations*, Greater Victoria School District; *Policy #78 Digital Citizenship*, Peel District School Board Policies and Regulations; *Responsible Use of Technology/Digital Citizenship Agreement for Students*, Regina Public Schools; *Policy P.100.IT Appropriate Use of Technology*, Ottawa-Carleton District School Board; *JFCBA Appropriate Use of Communication Devices and Online Information Resources*, The Winnipeg School Division.

[13] In British Columbia, the *Freedom of Information and Protection of Privacy Act*, RSBC 1996, c. 165; and *Personal Information Protection Act*, SBC 2003, c. 63.

[14] *Investigation Report, Video Surveillance by public bodies: a discussion*, David H. Flaherty, Information and Privacy Commissioner, March 31, 1998.

[15] Updated January, 2014.

[16] See for example, *TransLink Video Surveillance & Audio Recording Privacy Statement*, TransLink; *Policy 4001-2 Buildings & Grounds – Town Owned Buildings – Video Surveillance of Town-owned Buildings (CCTV)*, Town of Qualicum Beach.

[17] *UFCW, Local 401 v. Alberta (Information and Privacy Commissioner)*, 2013 SCC 62, [2013] 3 S.C.R. 733, para. 24.

[18] 2018 ABQB 112.

greater spans of time and because the resulting recordings can be paused, replayed and studied: para. 45. This additional dimension of a recording, and the resulting impact on privacy, was recognized by this Court in *Wong*: pp. 51-3. Voith J. also considered the effect of the preservation of a recording and concluded that it was a relevant factor in assessing whether the circumstances in question gave rise to a reasonable expectation of privacy: *Rudiger*, paras. 90-102.

24. A student is likely to notice if her teacher is ogling her breasts, such that she can (1) remove herself, if possible, from the situation and (2) report the conduct. A surreptitious recording deprives the student of the necessary knowledge and awareness to allow for a choice about evasive and corrective action. The teacher is able to accomplish, via the surreptitious device, what he or she likely could not accomplish without it. The presence of security cameras does not negate the student's reasonable expectation of privacy as against the covert use of a recording device. Rather, the security cameras, to some degree, capture additional meaningful layers of privacy which enhance both the existence and the reasonableness of such a privacy expectation in many, perhaps most, imaginable circumstances. As with the naked eye, security cameras are visible and allow individuals some element of choice as to how they conduct themselves when they know their actions are being recorded. This is especially so where there are specified regulations encompassing the use, access and retention of any images or recordings.

25. Presence in a public place is not tantamount to the forfeiture of any expectation of privacy. This is particularly so where the advances of modern technology allow persons to be virtually undressed whether by a zoom lens used to look down a blouse or up a skirt, or by the seemingly infinite capacity to manipulate captured images. The ability to control one's sexual integrity is central to the notion of personal autonomy. The location in which that is violated is relevant but not determinative in the analysis. Rather, as noted, a variety of factors and factual circumstances allow courts to determine the existence and objective reasonableness of an expectation of privacy in a particular case.

26. A further consideration involves the particular vulnerability of children. This Court recognized that very factor in *A.B. v. Bragg Communications Inc.*[19]:

[19] 2012 SCC 46, [2012] 2 S.C.R. 567.

> [17] Recognition of the *inherent* vulnerability of children has consistent and deep roots in Canadian law. This results in protection for young people's privacy under the *Criminal Code*, R.S.C. 1985, c. C-46 (s. 486), the Youth Criminal Justice Act, S.C. 2002, c. 1 (s. 110), and child welfare legislation, not to mention international protections such as the *Convention on the Rights of the Child*, Can. T.S. 1992 No. 3, all based on age, not the sensitivity of the particular child. As a result, in an application involving sexualized cyberbullying, there is no need for a particular child to demonstrate that she personally conforms to this legal paradigm. The law attributes the heightened vulnerability based on chronology, not temperament: See *R. v. D.B.*, 2008 SCC 25 (CanLII), [2008] 2 S.C.R. 3, at paras. 41, 61 and 84-87; *R. v. Sharpe*, 2001 SCC 2 (CanLII), [2001] 1 S.C.R. 45, at paras. 170-74.

27. This Court has also recognized that protection of the privacy of young persons fosters respect for their dignity, personal integrity and autonomy.[20] This reflects important societal values. It is somewhat ironic that the presence of video surveillance, installed primarily for the protection of students, would create an environment in which those same students were made more vulnerable to the covert actions of a teacher. Rather, the recognized vulnerability of young persons should weigh in favour of a finding that the students in question had an objectively reasonable expectation of privacy in the circumstances.

28. A location-based analysis ignores critical considerations in determining whether the subject of the surreptitious recording had a reasonable expectation of privacy. Voith J. considered and rejected the notion that because a person is in a location which is ostensibly public they can no longer continue to have any reasonable expectation of relative privacy as untenable: *Rudiger*, para. 113. He recognized that this would entail some form of risk analysis whereby, for example, a person who goes to a water park with his or her child exposes and accepts the prospects of that child being captured on videotape, regardless of the form, content or intent of that videotape: *Rudiger*, para. 113. This Court came to a similar conclusion in *UFCW, Local 401*:

> [27] It goes without saying that by appearing in public, an individual does not automatically forfeit his or her interest in retaining control over the personal information which is thereby exposed. This is especially true given the developments in technology that make it possible for personal information to be recorded with ease, distributed to an almost infinite audience, and stored indefinitely.

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[20] *A.B.*, para. 18 citing with approval *Toronto Star Newspaper Ltd. v. Ontario*, 2012 ONCJ 27.

29. An approach where a person forfeits all rights to privacy by entering into a space where other persons are present and/or where video surveillance is employed, is simply not tenable in modern society. It does not reflect the important societal values of individual autonomy, dignity and privacy.

30. The incorporation of the analytical framework developed under s. 8 of the *Charter* is consistent with social values, provides for a contextual, normative analysis taking into account the totality of the circumstances, and creates a consistent standard for the evaluation of the reasonableness of any expectation of privacy whether as against the state or as against another individual. The established framework is adaptive, flexible and capable of addressing advances in technology which threaten the core of what the voyeurism offence seeks to protect, an individual's sexual integrity.

PART IV – SUBMISSIONS CONCERNING COSTS

31. The AGBC makes no submissions on costs.

PART V – ORDER SOUGHT

32. The AGBC seeks no order in connection with this appeal.

ALL OF WHICH IS RESPECTFULLY SUBMITTED,

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Counsel for the Intervener
Attorney General for British Columbia

dated this 5th day of April, 2018
at Victoria, British Columbia

PART VI – LIST OF AUTHORITIES

Para No.

Statutory Provisions

Para No.

Other Sources

Para No.