

CANADIAN HUMAN RIGHTS TRIBUNAL

B E T W E E N:

**FIRST NATIONS CHILD AND FAMILY CARING SOCIETY OF CANADA and
ASSEMBLY OF FIRST NATIONS**

Complainants

- and -

CANADIAN HUMAN RIGHTS COMMISSION

Commission

- and -

**ATTORNEY GENERAL OF CANADA
(Representing the Minister of Indigenous Services Canada)**

Respondent

- and -

**CHIEFS OF ONTARIO,
AMNESTY INTERNATIONAL and NISHNAWBE ASKI NATION**

Interested Parties

WILL SAY STATEMENT OF BRITTANY MATHEWS

1. Brittany Mathews is a member of the Métis Nation of Alberta and is the Director of Reconciliation and Strategic Policy at the First Nations Child and Family Caring Society (the “**Caring Society**”). Ms. Mathews has Honours Bachelor of Arts in Indigenous Studies and a minor in Conflict Studies and Human Rights, from the University of Ottawa.
2. Ms. Mathews has worked at the Caring Society since 2017, initially as an Executive Assistant and subsequently as the Reconciliation and Research Coordinator and the Reconciliation and Policy Coordinator. She became the Director of Reconciliation and Policy in 2024 and transitioned to Director of Reconciliation and Strategic Policy in May 2025.
3. In her roles as the Reconciliation and Research Coordinator, Reconciliation and Policy Coordinator and Director roles, Ms. Mathews assists families, First Nation service coordinators,

and service providers who contact the Caring Society with difficulties accessing supports, products and services from the federal government pursuant to Jordan's Principle. Together with other Caring Society colleagues, she reviews information provided by requestors, communicates with them and, has at times, identified concerns directly with officials at Indigenous Services Canada ("ISC"), Ms. Mathews will describe the matters within her personal knowledge including the nature of non-identifying request(s), the steps taking to address them and ISC's responses and the records maintained in the course of that work.

4. In addition to her work assisting First Nations children and families, Ms. Mathews attends meetings of the Jordan's Principle Operations Committee ("**JPOC**"). JPOC is composed of 27 members: 6 First Nation partners, 10 First Nations regional representatives, and 11 from ISC. The Caring Society is one of those First Nations partners. JPOC is co-chaired by the Assembly of First Nations ("**AFN**") and ISC.

5. Ms. Mathews' evidence will address matters raised at JPOC that are relevant to the discriminatory conduct identified in 2025 CHRT 6 and to Canada's reliance on the February 10, 2025 Jordan's Principle Operational Bulletin: Updates to the Implementation of Jordan's Principle (the "**Operational Bulletin**"). She will describe the definitions, interpretations, criteria and decision-making practices raised with ISC; the harms that First Nations representatives advised could result or were resulting from that conduct; the solutions and corrective measures proposed by JPOC members; Canada's responses; and ISC's continuation or implementation of the challenged conduct despite that notice. Her evidence will address how Canada's conduct has impeded progress on matters including an independent appeals process, a complaint mechanism, request and reimbursement/payment backlogs, and the determination of Jordan's Principle requests in a manner consistent with the relief addressed in 2025 CHRT 6.

6. With respect to the appeals process in particular, Ms. Mathews' evidence will address the federal government's significant and unilateral change: an independent process was in place for a number of years, with the Appeals Secretariat reporting to the Chief Medical Officer of Public Health within ISC, who for a number of years was Dr. Wong. Instead, the process no longer

exists and instead senior officials within ISC determine appeals. JPOC recently established the Appeals Working Group and Ms. Mathews will describe those meetings.

7. Further, Ms. Mathews serves on the Jordan's Principle Action Table ("JPAT"), chaired by the AFN. Membership includes representatives from the AFN, ISC, the National First Nations Health Technicians Network, CFS Agencies, the Non-Insured Health Benefits Navigators Network and the National Indian Education Council, as well as experts within the field of service delivery and Jordan's Principle. Since November 2024, two JPAT caucus meetings were held (virtually) and two in-person JPAT meetings were held (June 10-11, 2025, and April 14-15, 2026). Ms. Mathews will provide evidence regarding concerns raised by First Nations members, recommendations and solutions discussed, backlog reduction and access to services for First Nations children.

8. Ms. Mathews' evidence will also focus on the issues and concerns raised with the Caring Society by First Nations leadership, families, service coordinators, service providers and other community representatives since ISC's unilateral release of the Operational Bulletin from across the country. Ms. Mathews' evidence will further describe the concerns the Caring Society has raised to ISC regarding its conduct on Jordan's Principle and ISC's responses thereto.

9. Ms. Mathews will also provide evidence on existing fora, including JPOC, JPAT and the Expert Advisory Committee established pursuant to this Tribunal's order in 2022 CHRT 8 to permanently remedy ISC's discriminatory conduct in 2025 CHRT 6.