Access to City Services for Undocumented Torontonians

Date: May 7, 2014
To: Community Development and Recreation Committee
From: Executive Director, Social Development, Finance & Administration
Wards: All
Reference Number: 18943

SUMMARY

On February 20, 2013, in considering the report, "Undocumented Workers in Toronto" (CD 18.5), Council reaffirmed its commitment to ensuring that Torontonians without full status or full status documents have access to City services without fear, and requested that City staff improve undocumented Torontonians’ access to City services.

In response, an Access to City Services for Undocumented Torontonians Working Group was created with the objective of improving access to City’s service for undocumented Torontonians without fear. Comprised of 21 City divisions, agencies and corporations, the Working Group has identified specific measures required to address the service delivery needs of undocumented Torontonians. Measures include: (1) clarification of the City services that can be accessed by undocumented Torontonians without fear, those that require proof of identity, and options for the City to limit the collection of immigrant/citizenship information; (2) a training plan for City staff; (3) clarification of the complaints process related to accessing City services; (4) a public education campaign to raise awareness about the City's commitment to access without fear; (5) supports to City-funded agencies to increase the role they play in increasing service access without fear; and (6), work the City must do with other orders of government. This report provides an update on the implementation and implications of these measures.
RECOMMENDATIONS

The Executive Director, Social Development, Finance & Administration recommends that:

1. City Council direct that immigration/citizenship information for the purposes of determining service/program eligibility only be collected where specifically required by either provincial or federal legislation, policies or agreements;

2. City Council direct City divisions, agencies and corporations to review their policies and procedures to ensure consistency with Council's commitment to access to City services for undocumented Torontonians;

3. City Council direct the Executive Director, Human Resources, and Executive Director, Social Development, Finance and Administration, and other City divisions, agencies and corporations as required, to implement a training program to inform, educate and train appropriate City staff regarding access to City services for undocumented Torontonians and determine the costs associated to implement the plan and report any implications through the 2015 budget process;

4. City Council request the Director, Strategic Communications, and the Executive Director, Social Development, Finance and Administration to implement a Communications Plan to inform community organizations and Torontonians on the City's commitment to and measures for ensuring access to City services for undocumented Torontonians and determine the costs associated to implement the plan and report any implications through the 2015 budget process;

5. City Council request that the General Manager of Children's Services continue to meet with Ministry of Education officials regarding guidelines for accessing child care fee subsidy for immigrants without full status or full status documents;

6. City Council request the Provincial government to review the Ontario Works legislation and residency policy with a view to ensuring access to social services for undocumented Torontonians; and

7. City Council request the Provincial and Federal governments reconsider immigration and refugee policies, in order to facilitate access to social assistance, health care and housing for undocumented Torontonians.

Financial Impact
The adoption of the recommendations contained in this report will have no financial impact in 2014. However, there may be financial impact in some service areas in 2015. Any 2015 financial impacts will be included in the 2015 budget process for Council consideration.

The Deputy City Manager and Chief Financial Officer has reviewed this report and agree with the financial impact information.
DECISION HISTORY

At its meeting of February 20 and 21, 2013, City Council adopted the following:

1. City Council re-affirms its commitment to ensuring access to services without fear to immigrants without full status or without full status documents.

2. City Council requests the Executive Director, Social Development, Finance and Administration, to conduct an internal review, with community consultation, of City divisions, agencies and corporations, and to report on the following:
   a. a review of opportunities to improve access without fear;
   b. opportunities for City-funded agencies to improve access without fear;
   c. provide training for front line staff and managers to ensure that undocumented residents can access services without fear; and
   d. a complaints protocol and a public education strategy to inform Torontonians of City's policy.

The full direction is available at:

In May 2013, City Council adopted a report from the Medical Officer of Health: HL21.5 -- Medically Uninsured Residents in Toronto. Council directed that a copy of the report be forwarded to Social Development, Finance and Administration to inform their work on improving access to City of Toronto programs and services for undocumented Torontonians. Additional information may be found at:

ISSUE BACKGROUND

It is extremely difficult to determine how many people live in Canada without authorized migratory status. Canada does not have exit controls, which makes it impossible to know how many people who enter Canada under some form of temporary status remain in the country when their permits expire. While there is no current data, past reports indicate there may be between 20,000 and 500,000 undocumented people living in Canada.¹ Large urban areas are likely to be home to most undocumented persons. It is estimated that 50% of undocumented persons living in Canada reside in Toronto.²

There are many reasons a Torontonian may become undocumented. Temporary residents include foreign students, temporary foreign workers, construction workers, caregivers and

others. Many of these temporary workers may not be eligible for permanent status, or the process may be prohibitively long and costly. This means, when an employment contract ends or breaks down, an individual may determine they have no other choice than to stay in Canada, without status. Once a person becomes undocumented, they have limited or no access to many essential services and supports, and can become vulnerable to employer exploitation and mental health issues.³

In North America and Europe the term "undocumented" is used to describe people who remain in a country without authorization. In Canada, some researchers use the term "non-status" because people in this situation are known to the state but no longer have lawful status. The Canadian Council for Refugees also uses the term person without status. This means "a person who has not been granted permission to stay in the country, or who has stayed after their visa has expired."⁴

Research shows that undocumented persons live in constant fear of deportation, distrust of authority, isolation due to family separation and a sense of disconnection from society. Combined, these circumstances have a profound impact on the health and wellbeing of undocumented people and often cause high levels of anxiety, depression, chronic stress and stress-related physical illnesses.⁵

**Undocumented Torontonians**

The City of Toronto Act (COTA) s. 1 states "municipality means a geographic area whose inhabitants are incorporated."⁶ Simply put, the City is a "municipal corporation" which consists of all people living in the city. While Council may legally "differentiate in any way and on any basis" the City considers appropriate (s. 10), it cannot do so in a manner contrary to the Charter or Human Rights Code. Any policy decision by Council to differentiate between Torontonians in the provision of services must be done in a deliberate and transparent manner.

As a municipality, it is not within the jurisdiction of the City of Toronto to monitor undocumented persons. In fact, the City should not request information regarding immigration status unless required to do so by another order of government.

In recognition of its responsibility to serve all Torontonians, Council has taken a proactive policy position committing to ensuring that immigrants without full status or full status documents have access to City services without fear. Council further directed

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⁴ Canadian Council of Refugees.
⁶ City of Toronto Act, 2006.

Staff report for action on Access to City Services
staff to take a proactive approach to review current service provision and identify opportunities to increase accessibility to City services to undocumented Torontonians.

COMMENTS

In order to develop a seamless City strategy to understand the issues of undocumented Torontonians and their fear of accessing City services, Social Development, Finance and Administration (SDFA) convened an interdivisional City staff team – the Access to City Services for Undocumented Torontonians Working Group. Twenty-one key City divisions, agencies and corporations were invited to participate (Appendix A). The Working Group worked collaboratively over the past year to determine the most appropriate strategy to address this complex issue. To increase their understanding of the issues to determine effective City responses, the Working Group consulted with several community-based organizations (Appendix B) and held an Open Dialogue on Social Development on December 6, 2013, and a Community Conversation on March 27, 2014. The Working group received comments surrounded six main themes: (1) accessing health and housing services; (2) accessing employment opportunities; (3) obtaining family support, such as child care; (4) training and communication skills required for City Staff; (5) implementation of a public education campaign; and (6) development of a municipal identification card.

Six measures devised at the Working Group level to improve access are detailed below.

1. Review of City Opportunities to Improve Access

The City regularly reviews its services and programs to ensure that they continue to be accessible to Torontonians. This can include dimensions of access, such as: geography, language, culture, affordability, etc. In some instances, in order to access specific services offered by the City of Toronto, Torontonians may need to provide proof of identity. For undocumented Torontonians, this is the most challenging aspect of accessing services. Proof of identity may include verification of name, date of birth, income/assets, address, and in the case of some provincially mandated services, proof of immigration status.

Each of the City’s divisions, agencies and corporations is unique in how it provides service. The Working Group members analyzed their services carefully to determine which service requires a type of “proof of identity,” for what purpose, and how the information is kept. It was determined that in some instances City divisions, agencies and corporations need to ask questions pertaining to immigration status prior to the provision of services. As outlined in Appendix C, these services are provided by: Employment and Social Services; Municipal Licensing and Standards; Shelter, Support & Housing Administration; and Toronto Community Housing.

The Working Group also documented whether the information is shared with other orders of government, and if so, under what circumstances the information is shared, and whether this sharing relationship is reciprocal.
Confidentiality Issues

Under the Municipal Freedom of Information and Protection of Privacy Act (MFIPPA), the City cannot collect personal information unless it is legally authorized to do so by statute or by-law. In addition, the City can only collect information which is required for the provision of services. With few exceptions, personal information must be collected directly from the individual. The City must give the individual advance notice in writing of: (1) its authority to collect their information; (2) how the information will be used; and (3) whom an individual can contact if they have questions about the use of personal information.

Under the Forms Policy approved by the City Manager, all City forms, surveys and other documents that collect information, whether internal or external, must have a privacy compliance review by Corporate Information Management Services to ensure they meet legislated requirements. The Privacy Compliance Review Process ensures that divisions are only collecting the personal information they are authorized to collect, and all City forms are centrally controlled and registered. This process may be used to identify requests by specific service areas to determine if they are authorized to collect proof of identity.

The process of reviewing City services in the context of access to service without fear has provided a broader opportunity to review what information is being collected in City programs and to confirm what proof of identity is required for a Torontonian to receive service. The City can improve access to City services by simply ensuring it is only asking for personal information when it is absolutely necessary for service delivery.

Sharing Information

Under MFIPPA, the City cannot disclose personal information to another government except in two very limited circumstances:

1. Law Enforcement Investigations: The City may disclose personal information to a law enforcement agency to aid a specific investigation. This is at the City's discretion. City staff must not disclose information without a formal written request from the law enforcement body that has been vetted by Corporate Information Management Services.

2. Statutory Requirement: The City must disclose personal information to a government agency where the law requires disclosure upon a written request from that agency. Examples include: Canada Revenue Agency for tax audit purposes, Ministry of Labour for health and safety purposes.

Corporate Information Management Services has developed processes that City staff must follow when they receive a request for information from either law enforcement or another government agency. Corporate Information Management Services reviews these requests and provides appropriate direction and procedures for whether and how the information can be released. However, in the case of Municipal Licensing and Standards, bylaw enforcement officers often work in partnership with other law enforcement agencies. For example: During routine inspections/investigations, City bylaw enforcement officer may
incidentally discover immigration status information. In such cases, a bylaw enforcement officer may request assistance from the appropriate authority, such as the Toronto Police Service.

Notwithstanding directions from Corporate Information Management Services, the best way to ensure the City is not inappropriately providing personal information regarding immigration/citizenship status is to never hold the information in the first place. Immigration/citizenship information can be particularly sensitive and should only be collected by the City when absolutely required. The exception to this is when immigration/citizenship information is directly relevant to providing assistance to a Torontonian, such as helping an individual to find housing. It is recommended that Council direct that immigration/citizenship information for the purposes of determining service/program eligibility only be collected where specifically required by either provincial or federal legislation.

**Municipal Identification Card**

During consultations, some stakeholders strongly argue that a municipal identification card may make service access easier for undocumented Torontonians. A number of American municipalities have implemented a municipal identification program, including San Francisco, Los Angeles, Trenton, Washington D.C., and New Haven, Connecticut. The identification program is limited because the cards are not accepted by federal agencies as a form of identification, cannot serve as a driver's license, and are not valid to purchase alcohol or tobacco.

Under MFIPPA, personal information that the City has collected must be retained after use for a period of one year or the period set out in the City Retention Bylaw, to ensure that the individual has a reasonable opportunity to obtain access to their personal information. Once the information needed to issue an identification card has been collected, the City is not permitted to destroy that information until the retention period has expired. Therefore, the City of Toronto needs to consider several implications of implementing a Municipal Identification Card, including:

1. Destruction of the evidence used to establish the identification could raise questions about the integrity of the issuance process;

2. Under MFIPPA, the existence and full description of a municipal identification card database would have to be publicly transparent in the Directory of Records on the City's website;

3. This information would be vulnerable to disclosure during the retention period in the event of a law enforcement investigation or a formal request from another order of government;

4. The card would serve to further identify undocumented Torontonians and may leave them more vulnerable to legal demands for disclosure (i.e., the majority of individuals using the card will likely be undocumented Torontonians); and
5. The card would decrease privacy protections for this vulnerable population.

In addition to the complex issues surrounding MFIPPA, other measures would need to be in place to address equity, diversity and human rights issues before a municipal identification card could be pursued:

1. For the most part, municipal services in Toronto do not require identification other than proof of residency, such as a utility bill. Unless the City and other orders of government negotiate the federal and provincial services that could be accessed using the municipal identification card (i.e. the municipal identification card would serve as a stepping stone towards regularization either through a Permanent Resident Card and/or Citizenship Card or it could be used to get a driver's license) the card will have limited validity.

2. Under the City's Human Rights and Anti-Harassment/Discrimination policy, service recipients can raise a discrimination complaint to the City's Human Rights Office. Under the Ontario Human Rights Code, a complaint of harassment and/or discrimination can be launched with the Human Rights Tribunal of Ontario on the ground of "citizenship" irrespective of actual status except where Canadian citizenship is a legal requirement to get a job or get certain services (for example, certain competitive sports require that participants be either Canadian citizens or permanent residents). A municipal identification card would have no effect in these circumstances.

3. The City could be legally mandated to share the information with other orders of government and/or government agencies. This defeats the purpose and spirit of Toronto being a "Sanctuary City" as referenced by advocates. 7,8

2. Staff Training to Ensure Access

The City of Toronto is undertaking a strategic initiative aimed at improving customer service for vulnerable populations, including aboriginal people, those who suffer with mental health issues, victims of human trafficking, and undocumented Torontonians. The goal of this initiative will be to ensure Toronto Public Service employees have a good understanding of the diverse community they serve and are better equipped to provide effective service without fear.

SDFA, Human Resources, Strategic Communications and other City divisions, will work together along with City agencies and corporations to identify resources for this initiative.

7 Solidarity City Network. "Towards a Sanctuary City: Assessments and recommendations on municipal service provision to undocumented residents in Toronto." (2013.)
8 Social Planning Toronto. "Accessing Community Programs and Services for Non-status Immigrants in Toronto: Organizational challenges and responses." (2013.)
Strategic Communications has developed a communications plan to support the City's commitment to access without fear for undocumented Torontonians. The goal of the plan is to improve understanding by City staff of the circumstances under which they may ask for and collect personal information. The plan will also inform staff of Council's direction to provide services to all residents, regardless of status (where possible). The plan also addresses information-sharing with undocumented residents to increase understanding of the availability of City services and when identification is required to access those services.

The training will include an online learning solution that will link to various resources (websites, eLearning modules that will be shared through the City's Enterprise Learning Initiative portal, etc.) to help participants better understand the diverse needs and challenges faced by vulnerable populations in Toronto. It will be available to management staff, who in-turn will identify the training their staff may require. Some training modules will also include facilitator notes for managers so that the training is delivered consistently across the City. Management staff and their teams will be able to identify any unique gaps or opportunities to improve service to Torontonians.

Internally, a variety of tactics will be used including web updates under the Doing it Right banner, Monday Morning News, City Insider, posters at workplaces and managers' information packages. Messages will be tailored and specific to each division to provide clarity to staff about the collection of personal information and they will determine the costs associated to implement the plan and report any implications through the 2015 budget process.

### 3. Enabling Service Complaints without Fear

The City of Toronto aims to deliver exceptional, equitable, and accessible customer service. Any City service recipient can raise a discrimination complaint to the City's Human Rights Office. Furthermore, if Torontonians are dissatisfied with the service they receive, or feel they have been wrongfully excluded from receiving a service, they may make a complaint directly to the division or through 311, by phone or online. All City divisions have established customer service complaint protocols based on corporate complaint handling guidelines. Corporate complaints handling guidelines outline how the City of Toronto will manage complaints efficiently, fairly, effectively and uniformly across all City divisions.⁹

The Working Group affirmed that current complaints processes does not require any proof of an individual's identity or status. Therefore, a separate complaints protocol regarding access to services is not required. The current system serves the needs of undocumented Torontonians, though greater communication into this community maybe required to increase use of the various complaints processes without fear.

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⁹ City of Toronto Complaints Protocol.
4. **Public Education to Increase Access**

Once City staff are fully trained around the issue of privacy, an external public awareness campaign will commence. Depending on budget, a variety of tactics will be undertaken including posting information on the City's website and posters at community centres, employment centres, libraries and community agencies. Information packages and posters will be distributed to Councillors for use in their newsletters and constituency offices. Consideration will be given to producing advertisements for inclusion in transit shelters and in ethnic newspapers.

This communication plan recommends enhanced, client-centred improvements to the current City efforts. The public education may be explained in four components.

1. A redesigned public poster in multiple languages to improve awareness of City programs and services available to all Torontonians: The current poster offered by the City of Toronto would be replaced with several different posters based on the type of service. Each poster would be thematically oriented (e.g. health services, programs for children, employment services).

2. An approved "Green List" of City services that may be accessed by all residents: This is a customer-oriented list of key services that the City of Toronto offers to all residents, regardless of status.

3. A common identifier that clearly shows when a service may be accessed without proof of immigration status: A visual identifier will be created that quickly identifies services at-a-glance as being accessible to all Toronto residents, regardless of their immigration status. This identifier will be similar in purpose to LGBT positive space stickers, or debit card stickers. A graphic identifier is also more accessible for those with limited knowledge of English.

4. A website and 311 Knowledge Base entry describing the program and the list of services that fall under it. The green list, poster campaign and visual identifier will be described in an online public portal, and the 311 Knowledge Base will be updated with clear information about identification requirements for City services. Together, these information sources will make it easier for Torontonians to understand what services can be accessed without fear, and will better inform staff about the requirements to access City services.

5. **Opportunities for City-funded Agencies to Improve Access**

Funding provided by SDFA to community agencies is geared to programs and services designed for vulnerable, marginalised and high-risk communities. However, SDFA does not specifically assess how and whether undocumented Torontonians access City-funded community services. The Community Funding portfolio supports a wide range of organizations with varying degrees of awareness of these access issues. While a number of...
community agencies are aware of their rights and responsibilities vis-à-vis Torontonians without full status or full status documents, many agencies are not. There is a need for education and training in the community services sector. The proposed public education campaign will help increase the capacity of community agencies to understand and support their clients in effectively navigating and accessing services.

In addition to providing staff and board members with training, the City could introduce a tool similar to the "Declaration of a Non-Discrimination Policy," which would require grant recipients to comply with the City's position on access to services for undocumented Torontonians as a condition of receiving funding or other support. Some community agencies, because of federal funding requirements, may need to collect proof of identity information that may have an impact on service access for undocumented Torontonians. The introduction of a City tool could not require grant recipients to contract funding obligations by another order of government.

6. Work with Provincial and Federal Governments to Increase Access

In March 2013, the City Manager submitted two letters to the other orders of government. The first letter was to the Deputy Minister of Citizenship, Immigration and Multiculturalism requesting that the Federal government establish a regularization program for undocumented workers. This letter also asked to increase the Provincial Nominee Program Levels.

The second letter was addressed to the Deputy Minister of Citizenship and Immigration. It requested the Provincial government to review its policies for Provincially-funded services for undocumented residents with a view to ensuring access to health care, emergency services, community housing and supports for such residents within a social determinants of health framework. To this date, the City has not received a response to the letters.

The Access to City Services for Undocumented Torontonians Working Group recognizes that the need to remove unnecessary barriers for undocumented Torontonians to access City services. Many barriers limit undocumented people's access to healthcare, income support programs, employment protection, affordable housing, settlement services, and social assistance. In some instances, intergovernmental collaboration is required in order the advance the efforts of City divisions, agencies and corporations. Consequently, the Working Group has identified the need for greater flexibility in the guidelines for accessing child care fee subsidy for immigrants without full status or full status documents, and a review of the Ontario Works legislation and residency policy with a view to ensuring access to social services for undocumented Torontonians. There is also a need for the Provincial and Federal governments to reconsider immigration and refugee policies, to increase access to social assistance, health care and housing.

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Social Development, Finance and Administration

ATTACHMENTS
Appendix A: Access to City Services for Undocumented Torontonians Working Group
Appendix B: List of Community Stakeholders
Appendix C: Service Access Requirements
Appendix A
Access to City Services for Undocumented Torontonians
Working Group

• 311 Toronto
• Affordable Housing Office
• Children's Services
• City Manager's Office:
  • Equity, Diversity, and Human Rights;
  • Human Resources; and
  • Strategic Communications
• Court Services
• Emergency Medical Services
• Employment & Social Services
• Facilities Management
• Fire Services
• Legal Services
• Municipal Licensing and Standards
• Parks, Forestry & Recreation
• Public Health
• Shelter, Support & Housing Administration
• Social Development, Finance & Administration
• Toronto Community Housing
• Toronto Police Service
• Toronto Public Library
• Toronto Transit Commission

Staff report for action on Access to City Services
Appendix B
List of Community Stakeholders

Children’s Peace Theatre  
Fairview Community Health  
FCJ Refugee Centre  
Harriet Tubman Community Organization  
Health for All  
Hispanic Development Council  
Illinois Coalition for Immigrant and Refugee Rights  
Immigration Legal Committee  
Income Security Advocacy Centre  
Law Office of Adela Crossley  
Metro Toronto Chinese and Southeast Asian Legal Clinic  
Migrant Workers Alliance for Change  
Neighbourhood Link  
Newcomer Women's Services Toronto  
No One is Illegal - Toronto  
Ontario Council of Agencies Serving Immigrants (OCASI)  
Parkdale Community Legal Services  
Social Planning Toronto  
Solidarity City Network Toronto  
South Asian Legal Clinic of Ontario  
South Riverdale Community Health Centre  
Thorncliffe Neighbourhood Office  
Volunteer Health Clinic for the Uninsured  
Warden Woods Local Immigration Partnership  
Willowdale Community Legal Services
## Appendix C
### Service Access Requirements

<table>
<thead>
<tr>
<th>City Divisions, Agencies and Corporations</th>
<th>Service</th>
<th>Proof of Identity</th>
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<th>Date of Birth</th>
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<td>Vaccination program</td>
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<td>Prenatal Counselling/Breastfeeding support/Postpartum adjustment</td>
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<td>Parenting workshops</td>
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<td>Toronto Preschool Speech and Language</td>
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<td>Registered health education sessions (e.g. smoking cessation, diabetes programs)</td>
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<td>Other health education workshops in the community (e.g., food skills, car seat safety, sun safety)</td>
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<td>Employability Application for OW/ODSP</td>
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<td>Application for and/or Access to Related Services</td>
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<td>Rental Housing - Private Market</td>
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<td>Housing Subsidies (rental supplements/housing allowances)</td>
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<td>Identification (eg. SIN, Birth Certificate)</td>
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<td>Borrow Library Materials (Library Card required)</td>
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<td>TTC Seniors/Student/Children Discount</td>
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* Age information required for child only