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Towards a Sanctuary City:

Assessment and recommendations on municipal service provision to undocumented residents in Toronto

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About Us: The Solidarity City Network

The Solidarity City Network organizes for access to services for all residents of Toronto, regardless of immigration status, and demands status for all.

The Solidarity City Network includes Toronto residents as well as a number of community organizations and advocacy groups, including: Alliance for South Asian Aids Prevention, Health for All, Immigration Legal Committee, Justice for Migrant Workers, Law Union of Ontario, No One Is Illegal – Toronto, Ontario Coalition Against Poverty, Parkdale Community Legal Services, Roma Community Centre, Social Planning Toronto, South Asian Legal Clinic of Ontario and the Workers' Action Centre.

Executive Summary

As access to permanent residence has become increasingly restricted, a rising number of immigrants who have made their home in Canada are being forced to live without status. In Toronto alone, community advocates estimate about 200,000 Torontonians have precarious (non-permanent, contingent) status, while another 200,000 do not have any immigration status.

These 400,000 precarious- and non-status migrants live and work in Toronto, pay taxes, raise families, build relationships, and support the economic, cultural and social fabric of life. However, many face limited access to public services and programs - a situation that exacerbates experiences of poverty, marginalization and exclusion in the city. Lack of access to services such as health clinics, schools, emergency shelters, recreation programs, food banks and more compromises the health and safety of everyone, not just the individual who is denied access.

After years of active campaigning by advocacy groups in Toronto, members of Toronto's City Council passed a resolution to affirm an "access without fear" policy, with implementation steps to be forthcoming in future council deliberations. The objective of this report is to gauge the current level of awareness of the "access without fear" policy by staff in municipally funded services and agencies. This report will also assess how well current intake procedures ensure accessibility in practice. In June and July of 2013, the Solidarity City Network conducted a telephone audit of 185 city-funded service providers to see how many currently turn away non-status residents or require particular documents that are practical barriers to access.

This report presents our audit of four major key service sectors: childcare, health care clinics, emergency shelters and food banks. We found that while the majority of staff at city funded agencies wished to provide services to non-status residents, they were not doing so due to inadequate training and confusion about the needs of non-status communities. Inaccessibility 'at the door' was a problem in a significant minority of the cases across all sectors, with some worse than others. Overall, 25% of the staff at the sites surveyed indicated that non-status residents could not receive services at their agency, centre or clinic, or they were unsure about the rules.

The findings of this report inform our key recommendations for policy implementation and build on our experiences working directly with undocumented residents in Toronto. We also present best practices in other 'sanctuary' cities and draw from the City of Toronto's own experiences in the development of access pathways for precarious- or non-status residents. We also highlight the broader issue of regularization and need for inter-governmental and cross-sector cooperation. With these findings and recommendations, we hope that this report will contribute to the timely and effective implementation of Toronto's "access without fear" policy.

Recommendations in brief

We firmly believe that immigration status should not be a factor in access to services and rights. The recommendations that follow aim to operationalize these principles. While our audit consisted of attempts by our undocumented or non-status clients to access city services, our clients and community members with temporary resident status (Temporary Foreign Workers, refugee claimants, etc) have experienced similar results when accessing services and rights. We use the word "non-status" or "undocumented" residents interchangeably to refer to all City of Toronto residents who have no immigration status in Canada (i.e. do not have a valid temporary status, permanent residence or citizenship).

Based on our research, it is clear that Toronto City Council must invest significant resources into ensuring access to city services to all Torontonians regardless of immigration status.

Targeted change: Department specific policies & funding

While three-quarters of the 185 city services we called said that they served undocumented people, the requirements for identification documents causes a barrier in most of those cases; less than 38% services required no official documents. Toronto should implement its Access Without Fear policy by ***identifying key city-funded services*** that undocumented residents access and then developing ***department specific policies*** in each of those services to ensure undocumented residents are able to access them. Any organization receiving a city grant must be asked to ***uphold Toronto's Access Without Fear Policy***.

Opening up the doors: Training, forms & language

A quarter of service providers called were not aware of Toronto's Access Without Fear policy and refused to serve undocumented residents or expressed confusion over the policy. To ensure that undocumented residents are not turned away at the door, all ***staff and volunteers at city funded/administered agencies*** must receive ***training*** on how to respond appropriately to the unique needs of non-status people; ***intake and registration forms must be amended*** to ***omit information on immigration status*** and ***a language access plan*** must be developed for non-English speaking residents. Only the most absolutely necessary information should be kept on file, and a clear plan must be put in place to ensure no information is shared with federal authorities.

Municipal ID cards

Almost all services require some sort of identification. In our experience,

undocumented residents either do not have such documentation or are afraid to share it. We recommend that a ***secure municipal ID card system that does not track*** ID card holders be developed and accepted as personal ID by all services.

Ensuring accountability

Currently, there are no mechanisms for undocumented residents or their allies to ensure accountability. Therefore, we recommend that the ***Toronto Human Rights Office policies be updated*** so that undocumented residents and community organizations can turn to it with accountability mechanisms should services be denied, and to create avenues for systematic changes.

Bridging the awareness gap

In 25% of cases, staff and volunteers at city-funded agencies were not aware of city policies requiring access for undocumented residents. It is clear that undocumented residents must be able to assert their rights. Therefore, we recommend that the city works with community leaders, and a multi-lingual strategy should be developed to ***ensure that undocumented residents are aware of their access to city services***. This includes public signage, advertisements in community newspapers and an online portal.

Ongoing evaluation

When the Access Without Fear policy was first introduced at City level in 2007, no implementation steps were put into place. It is imperative that the City's Access Without Fear policy be regularly evaluated (e.g. on a yearly basis) to ensure that all departments, City-funded agencies, staff, managers and volunteers, are fully aware of City policies and appropriately trained on protocols. Regular evaluation can assist in determining where programming and service gaps may exist, as well as how policies and protocols can be improved. We recommend that ***evaluation and monitoring tools be developed with community input and in collaboration with key community stakeholders***.

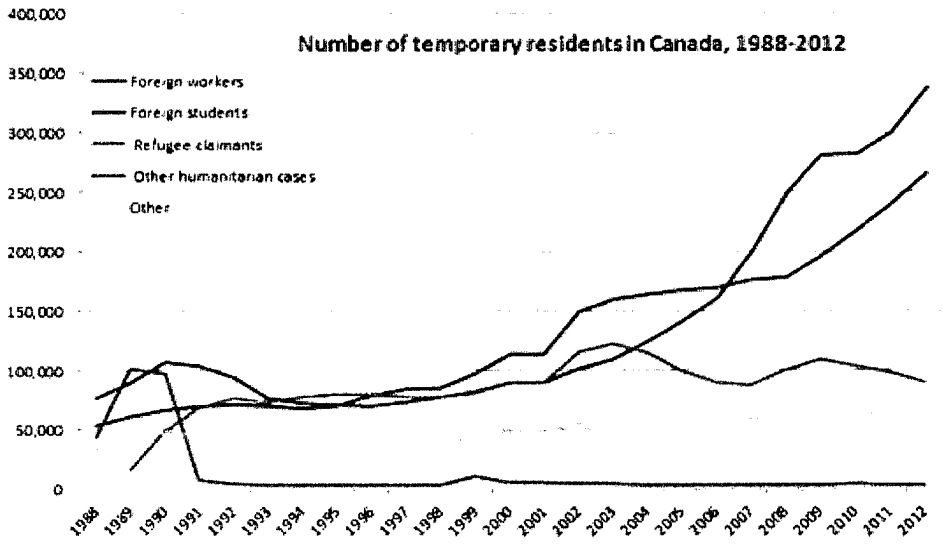
Background

Since 1976, there has been a yearly increase of immigrants arriving in Canada without full immigration status in comparison to those with immigration status.[1] Many of these migrants are unable to regularize their status due to increasingly restrictive laws, and some of them make the difficult decision of staying in the country without full immigration status.

In late 2007, the RCMP projected between 200,000 and 500,000 immigrants were living in the country without full immigration status. In that same year, there were another 669, 659 migrants with temporary status.

In 2012, there were 773, 758 residents with temporary status in Canada, of which about 25% are in Toronto.[2] Compared to ten years ago, there has been a 45% increase in migrants arriving with temporary status (see Figure1).

Figure 1: Number of temporary residents in Canada by category, 1988-2012



[1] Sharma, Nandita (2012) "The Difference that Borders Make: "Temporary Foreign Workers" and the Social Organization of Unfreedom," in *Legislated Inequality: Temporary Labour Migration in Canada*, edited by Patti Tamara Lenard, Christine Straehle, McGill-Queen's Press, pp. 31.

[2] http://www.cic.gc.ca/english/resources/statistics/facts2012/temporary/02.asp

The increase in temporary residents with precarious status has not been accompanied by a similar rise in permanent residence. Thus, even though more people have (restricted) access to permanent residence in the country, the number of immigrants without full status has skyrocketed. Vastly expanded temporary worker programs, a steep decline in refugee acceptance rates, and freezes and closures in family reunification streams have all contributed to this. Community advocates now estimate about 200,000 Torontonians have precarious status, while another 200,000 do not have any immigration status.

Non-status and undocumented migrants live and work in Toronto, pay taxes, raise families, build relationships, and support the economic, cultural and social fabric of life. However, many face limited access to public services and programs that exacerbate experiences of poverty, marginalization and exclusion in the city. Lack of access to important services such as health clinics, schools, emergency shelters, recreation programs, and food banks compromise the health and safety of everyone, not just the individual who is denied access.

While this report focuses on non-status and undocumented residents' access to city services, those with precarious or temporary status also have restricted rights and access compared to those with permanent residence or citizens. For example, many refugees face a dramatically reduced set of healthcare options, while many migrant workers have little to no employment standards, health and housing protections

that citizens or permanent residents enjoy. Over the years member organizations of the Solidarity City Network[3] and other grassroots community movements have advocated for a comprehensive and inclusive federal regularization program that is both equitable and accessible to ALL persons living without full immigration status in Canada, under the banner of Status for All.

In 2003, an art research project at the Toronto Immigration Detention Centre by No One Is Illegal - Toronto found that non-status residents identified *fear while accessing services* as the key obstacle to living in Toronto. As a result, the Access Without Fear Campaign was born. Since 2004, member organizations of the Solidarity City Network have been actively campaigning for access to services for Torontonians without full immigration status, or those without full documentation. This work builds on previous organizing for accessible services in Toronto since the early 1980s.

Immigration status was first brought to City Hall in 2004 deputations addressing poverty in Toronto, which identified immigration status barriers as a rising concern for local anti-poverty advocates. This new wave of organizing resulted in the Police Board's passing of a partial Don't Ask policy in 2006 and the Toronto District School Board declared schools as "sanctuary zones" in 2007. Later that year, advocacy groups raised the issue of access to municipal services at the City level, after which a poster was issued by the City of Toronto declaring City services accessible. Few implementation steps were put into place, however, and accessibility continues to be a problem at a number of service delivery points. In 2010, member organizations of the Solidarity City Network forced the Canada Border Services Agency (CBSA) to declare that they would not enter, wait outside, or call inquiring about the identification of undocumented women fleeing domestic abuse in any anti-violence against women's shelters. This policy was later amended to state that immigration officers would carry out these actions only with the explicit permission of management at those sites.

Our member organizations have also created and collaborated on multiple research reports including: Access Not Fear[4], Policy Without Practice[5], The Right to Learn[6],

[3] Members of the Solidarity City Network include Toronto residents as well as members of Alliance for South Asian Aids Prevention, Health for All, Immigration Legal Committee, Justice for Migrant Workers, Law Union of Ontario, No One Is Illegal – Toronto, Ontario Coalition Against Poverty, Parkdale Community Legal Services, Roma Community Centre, Social Planning Toronto, South Asian Legal Clinic of Ontario and Workers Action Centre.

[4] Berinstein, C., McDonald, J., Nyers, P., Wright, C, & Zerehi, S. (2006). "Access Not Fear": Non-Status Immigrants and City Services. Retrieved October 29, 2013, from: http://accessalliance.ca/sites/accessalliance/files/documents/AccessNotFearReport.doc

[5] Social Planning Toronto (2010) "Policy Without Practise: Barriers to Enrollment for Non-Status Immigrant Students in Toronto's Catholic Schools." Retrieved October 29, 2013 from http://socialplanningtoronto.org/wp-content/uploads/2010/07/Policy-Without-Practice-Social-Planning-Toronto-July-2010.pdf

[6] Social Planning Toronto (2008) "The Right to Learn: Access to Public Education for Non-status Immigrants." Retrieved October 29, 2013 from http://socialplanningtoronto.org/wp-content/uploads/2009/02/right_to_learn.pdf

and Made in Canada.[7] In 2009, Social Planning Toronto surveyed 111 out of 250 organizations and agencies in Toronto to identify programs and services that were open to non-status residents and what barriers they faced.[8] The study found that a significant percentage of services were not accessible to those without status, including services that were cross-funded by the provincial and federal governments. They also identified that half of the services required some form of ID, the most common being some form of immigration papers, a health card or valid passport. Furthermore, many of the surveyed organizations indicated that they would share immigration status with immigration authorities under certain circumstances.

To address these barriers and challenges that non-status residents experienced in accessing services, organizations that make up the Solidarity City Network moved forward a set of recommendations that were first adopted by the Community Development and Recreation Committee and eventually by the overwhelming majority of Councillors at City Council.

Motion CD18.5, passed on February 21, 2013 reads:

> *City Council re-affirm(s) its commitment to ensuring access to services without fear to immigrants without full status or without full status documents.*

The City of Toronto's "access without fear" policy affirms that residents without full status or documents are able to access city-funded services and infers that their personal information and status will not be shared with immigration authorities. These are the two core pillars of "access without fear." A report is expected to be delivered soon detailing concrete implementation steps. To ensure that this report is supported by the on-the-ground research, the Solidarity City Network carried out a study of municipally-funded services to determine key challenges faced by undocumented residents.

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[7] Faraday, Fay (2012) "Made in Canada: How the Law Constructs Migrant Workers' Insecurity," Metcalf Foundation. Retrieved October 29, 2013 from http://metcalffoundation.com/wp-content/uploads/2012/09/Made-in-Canada-Full-Report.pdf

[8] Social Planning Toronto (2013) "Accessing Community Programs and Services for Non-status Immigrants in Toronto: Organizational Challenges and Responses." Retrieved October 29, 2013 from http://www.socialplanningtoronto.org/wp-content/uploads/2013/08/Accessing-Community-Programs-and-Services-for-Non-status-Immigrants-in-Toronto-Organizational-Challenges-and-Responses.pdf

What we did

This study examines the extent to which municipal services are currently accessible to undocumented residents the four key service sectors of childcare, healthcare clinics, emergency shelters and food banks. The Solidarity City Network conducted a telephone audit of service providers to determine the accessibility of services, and if any barriers or conditions were placed on non-status people seeking those services.

In June and July of 2013, over a dozen members of the Solidarity City Network conducted a phone survey of municipally funded and administered services that were identified by our non-status members as the four key emergency services they need. A complete list of emergency shelters, food banks, and health centers as well as a subsample of childcare service sites was compiled from 211toronto.ca and from recommendations by the city's own 311 directory. In total, 185 out of 363 municipal services in these four sectors were randomly surveyed. The audit covered 77% of all city-run emergency shelters listed, 73% of food banks and 28% of municipally funded and administered health clinics, including sexual health clinics, dental clinics, prenatal care and breastfeeding clinics, and harm reduction services. From a sample of 90 childcare centres, 44% were audited in this study.

At each site we called, we asked if the service was accessible to undocumented residents and if so, what documents would be required to register. A short questionnaire and tracking sheet was developed in order to record and code responses collected from each agency or service provider. During the telephone inquiries, we documented the initial response given by staff members when asked if a person lacking immigration documents could access the service, which type of documents they require from clients to receive the service, if they had any referrals if they did not know the answer, and any other comments they made during our conversation.

The collected data was analyzed by sector to identify the accessibility of services "through the door" and the practical barriers that exist for undocumented persons.[9] A geographic analysis shows that inequality at the neighbourhood level may also be a challenge to accessibility for undocumented residents.

We also researched best practices in Chicago, San Francisco and Daytona - three prominent Sanctuary Cities in the United States of America. The recommendations in this report are supported by the City of San Francisco's Human Rights Department. All three of these cities have developed service plans that respond to training needs, public education, multi-lingual service needs and coordination with other levels of government funding different service sites. A summary of those findings appear as Appendix C to this report.

[9] This study only deals with one part of 'Access Without Fear' - access at the door. A comprehensive 'Access Without Fear' study would include questions on information storage, sharing (was information shared with any federal body) and agencies' practices when dealing with police and immigration enforcement (do service providers assert their right to silence, confidentiality and privacy).

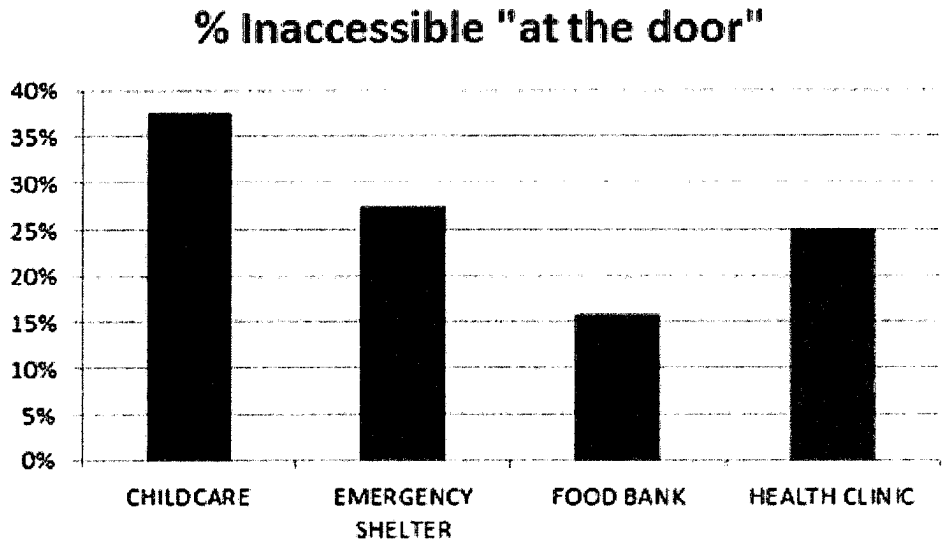
What we found

Access at the door

At each site called, the first question asked was whether a person without full immigration status or without immigration documents could receive services there. If the person replied "yes", then that site is recorded as accessible "at the door;" other responses were recorded as "no" or "don't know" if they did not know and/or needed to consult with someone else for an answer. Overall, 25% of the sites called indicated that undocumented residents could not receive services at their agency, centre or clinic, or were unsure about the rules.

Some sectors were more inaccessible than others. Staff members, usually supervisors, in 38% of childcare centres responded that undocumented residents were ineligible to register their child at that location. In contrast, 16% of food banks and 25% of health clinics said their doors were not open to undocumented residents. Among emergency shelters surveyed, 28% of staff said that immigration status would be a barrier. Some emergency shelters also receive Citizenship and Immigration Canada funding, and in those cases, refused to service non-status residents or would not guarantee their safety. Overall, accessibility is a problem at a significant number of municipal services (Figure 2).

Figure 2: Percent of city-funded services which are inaccessible, by sector



There is evidence of confusion about the city's policy regarding non-status residents. In one case, a staff member was misinformed about the city's policy itself, advising us to go to private clinics - "not through the city of Toronto." Contradictory advice was given at different agencies in the same sector. For example, 28% of shelters said they would not take in someone without immigration status, while others claimed that "no agency in Toronto will turn away someone without papers. They are welcome in all shelters." The inconsistency and confusion among agencies within the same sector generates uncertainty among non-status residents at best, and puts them at risk of exposure and deportation at worst.

About 14% of staff members said they did not know whether those without full immigration status could access services at their agency. A small number of those who said their services were accessible to non-status had to inquire with a supervisor or co-worker first before giving a definitive response. Lack of adequate staff training about how to respond to non-status residents is evident.

Accessibility by type of neighbourhood

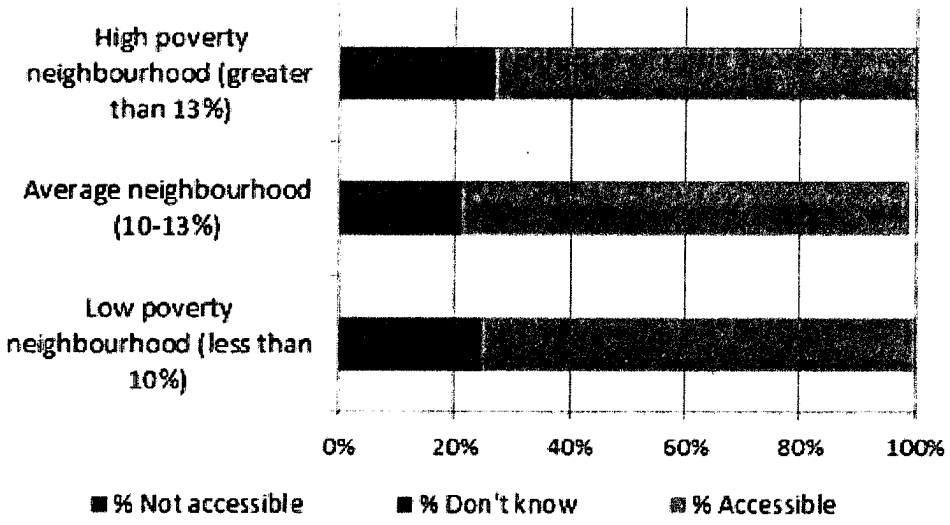
We examined whether accessibility to services differed by the type of neighbourhood in which the agency or centre was located. Undocumented residents are often also economically vulnerable and more likely to be concentrated in low-income neighbourhoods. Poverty rates in neighbourhoods are taken from the 2006 Census and measured as the percent of economic households with low-income ($2005 after-tax income).[10] In this analysis, neighbourhoods are defined as high, average or low poverty, using Toronto's average low-income rate (12%) as the reference point. Low poverty neighbourhoods are those with low-income rates below 10%; average neighbourhoods are those with low-income rates between 10-13%; and high poverty neighbourhoods are those where over 13% of households have low-income.

Services located in neighbourhoods with high and low levels of poverty had higher incidents of staff that would refuse services to non-status residents, or did not know if they would accept them (Figure 3). Those in wealthier neighbourhoods were the most likely to say they would not serve undocumented residents; 18% of municipal services that are located in neighbourhoods with low poverty rates said they would not accept residents who had no status. In comparison, 10% of services in neighbourhoods with high poverty rates said they would turn away undocumented residents, while in places with average poverty rates, only 4% of services called said they would not accept non-status residents.

Service staff were more likely to lack training on how to treat undocumented residents in neighbourhoods with average or higher poverty rates; 17% of service staff said they did not know what their policy is regarding serving non-status people. Thus, inaccessibility is higher in wealthier neighbourhoods while lack of adequate training is more prevalent in neighbourhoods with average to high rates of poverty.

[10] The average poverty rate for the Greater Toronto Area in 2006 is 12%.

Figure 3: Accessibility of city-funded services by neighbourhood type



Barriers to access

Accessibility "through the door" does not necessarily mean that there are not significant challenges to accessing services. While the majority of agency staff were ready and willing to provide services to non-status residents, the many existing intake procedures make access impossible or very difficult to obtain. Many services require documents that non-status residents do not have or are reluctant to provide. In addition, fees and other requirements like health insurance and immunization records can be hard for undocumented residents to provide. Our survey found that over half of agencies asked for some form of ID or official documentation in order to register or receive services.

The vast majority of municipal services that said they would not serve non-status residents required some kind of government ID or proof of status. Childcare centres that were inaccessible required the child to be eligible for childcare subsidy to register. Of the 139 services that are accessible "through the door," only 39% said they do not require any kind of documentation to be presented. 58% asked for some form of personal ID or documentation.

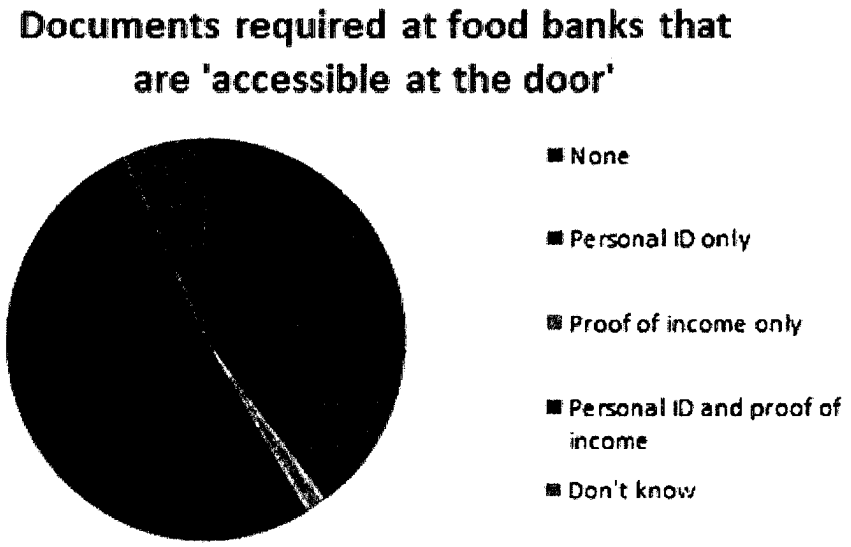
This is a significant barrier since many non-status members have indicated that they are afraid to show any form of ID for fear of being reported to immigration authorities. In places where staff members said they would refuse non-status residents, they also had hostile or ambivalent attitudes about the well-being of potential clients. In one example, a frontline worker said: "we're not going to protect her from immigration...

[CBSA] should be able to find her." This contradicts the city's commitment to provide "access without fear." Without adequate training and clear policies in place, staff ignorance will seriously undermine the safety and confidence of all non-status residents.

Ironically, the sector that was found to be the most 'accessible at the door' was also most likely to present barriers during their intake procedure. Although staff in 83% of food banks said they would not turn non status residents away, the vast majority of them required proof of income and/or personal ID in order to receive service (Figure 4). Only 17% of food banks did not require any ID or proof of income to access services. This is problematic as those without immigration status are not likely to have formal employment or receive paystubs or proof of social assistance receipt, since they are not authorized to work in Canada nor are eligible for assistance.

Of the 25 childcare centres that were identified as "accessible at the door," 80% required parents to present immunization records for their child in order to register. In addition, all non-status parents would have to pay full fees, since they could not qualify for the city's fee subsidy program. Furthermore, the majority of health clinics charged fees for services to those without proof of health insurance. These are significant challenges to undocumented residents who are already experiencing financial hardships.

Figure 4: Types of documents required at 'accessible' food banks



Conclusions and discussion

This audit of four key municipal services, conducted in June and July 2013, shows that a majority of service providers want to accept non-status residents but most lack the proper procedures to adequately provide it. Some services are found to be more inaccessible 'at the door' than others, such as childcare centres and health clinics. In higher income neighbourhoods, services were much more likely to turn non-status residents away at the door. Gaps were detected in staff awareness and training, particularly in neighbourhoods with average to high rates of poverty. Yet, across all key services, there are still challenges and practical barriers to receiving services. The vast majority of services called required some form of ID, documentation or fees for service that would be difficult or impossible for non-status residents to provide.

In US cities that have implemented "access without fear" practices, the issue of providing identification is at the core of measures taken to address how people could identify themselves safely if required (for example, the municipal ID card in San Francisco). If immigration status is required for service provision, then how is this information collected and if stored, how is security and anonymity guaranteed? Restrictions to sharing information with other authorities are an important issue in current successful "access without fear" practices.

Another lesson from existing "access without fear practices" is to expand education beyond training city staff and city-funded service providers. Public education campaigns involve the broader public, schools, communities, organizations and media. Educational efforts focus on awareness, information, building trust, shifting public discourse, and skill development. Chicago's comprehensive "Welcoming City" plan is the strongest example in this regard, with "Welcome Booths" explaining the city's policy installed throughout the city in targeted locations.

In most of the "sanctuary cities" in the U.S., access, complaint and accountability mechanisms are regularly monitored and evaluated together with frequent community consultation. These were key components of the implementation of sanctuary ordinances in major American cities. Chicago, for example, developed a liaison system with community leaders from immigrant neighbourhoods to ensure constant reviewing of the policy itself on the ground by designated community representatives.

Though it is important that "access without fear" practices are established at the municipal level, many services which are essential for the well-being of all residents of Toronto are funded and legislated on the provincial and federal levels. For a coherent and effective "access without fear" policy, the city of Toronto has to consider these services too, and pursue inter-governmental agreements that would strengthen their approach when possible, including with non-profit organizations. In the U.K., 'cities of sanctuary' are engaged with stakeholder

and community partners to incorporate sanctuary principles into their constitutions and to commit to related practices tailored to their organization.[11]

Finally, the political challenge of a successful "access without fear" policy in practice cannot be limited to the municipal level nor to questions of public service provision. If taken seriously, we have to tackle the creation of precarious immigration status in Canada. The more restrictive and temporary immigration status becomes, the higher the risk that many residents of Toronto will lose their status, creating access barriers across the city. With this in mind, the most sustainable form of "access without fear" practice is to prevent status loss from the outset and to regularize those who have lost it previously. This must be the long term goal of a successful "access without fear" strategy, and requires a determined and collective effort from communities, service providers and political representatives across all levels of government.

[11] https://www.sheffield.gov.uk/your-city-council/policy--performance/how-we-will-deliver/other-strategies-plans-and-policies/equality-and-diversity/engagement-and-involvement/city-sanctuary.html

Recommendations in detail

Targeted change: Department specific policies & funding

1. Through an internal audit and ongoing community consultation, we recommend that key services be identified which are considered "priority services" and that will improve the quality of life for undocumented residents in Toronto. We recommend that any public education, staff and volunteer training and community engagement begin with these services. Some of the common municipal and provincial services identified through community-based research[12] include:

Municipal level

- Children's daycare subsidy
- Community recreation centres & Welcome Policy
- Shelters
- Public health services
- Pre & post natal care
- Low-cost dental care
- Hardship Fund
- City of Toronto funeral services
- Food banks and community social services/programs
- Toronto police

Provincial and/or municipally administered

- Toronto schools
- Social housing
- Social assistance
- Post-Secondary Education

<u>Prohibit sharing of status information with immigration authorities</u>

2. Following Chicago and San Francisco, we recommend that Toronto insist that Toronto police uphold the principles of Access Without Fear in line with the approved policy. This means urging the City-funded agency not to share information with Federal immigration authorities. In other cities, this has involved targeted cultural sensitivity training for police officers, regular community consultation mechanisms in the first years of the policy to monitor its implementation, and firm accountability measures in place in cases where the policy is being violated.

3. Social housing along with Ontario Works and Ontario Disability Support Program are under Provincial legislation. However, (with the current exception of ODSP) they are administered by City Staff bound to the City's Access Without Fear policy. As such, we recommend that the policy be implemented and training be undertaken to ensure that the minimum necessary information is gathered to ensure that the person is eligible to receive benefits, and under no circumstance should City Staff be sharing information with Immigration officers or Immigration enforcement officers.

<u>Municipal-provincial cooperation and community partnerships</u>

[12] Sidhu, N., Boate, C., & Guttman, E. (2010). Toronto Community Services Resource Guide. Toronto: Social Planning Toronto. Retrieved from http://socialplanningtoronto.org/wp-content/uploads/2010/10/Toronto_Community_Services_Resource_Guide_2010.pdf

4. Efforts must be made to remove any barriers towards self-employment or small business development, so that immigrants with less than full status are able to create economic opportunities for themselves and others. Currently, in order to receive a business registration number from the Province, applicants are not required to provide any information regarding their immigration status.

5. We recommend that the City of Toronto work with community partners to amend Toronto's Access, Equity & Human Rights policy to ensure full access to services for non-status residents. All community agencies and organizations that receive funding through the City's Community Partnership & Investment Program (CPIP) and Access, Equity & Human Rights Grants (AEHR), should be reminded that programs and services that are specifically City-funded must be open to non-status residents and their families.

6. We recommend the City of Toronto dedicate financial resources to organizations that provide accessible services and advocate Access Without Fear. Particularly, funding should be earmarked for specific services that are not otherwise funded, including (but not limited to): advocacy for access to Provincial services, advocacy for a comprehensive regularization program, providing employment access and helping establish businesses for undocumented families, and direct community-legal support to apply for full immigration status in Canada.

Opening up the doors: Training, forms & language

1. Community consultation should define the structure of training systems and its department-specific implementation. We recommend mandatory training for all City staff and particularly of all volunteers. This must also be implemented at City-funded agencies where all staff (front-line and managerial) serves non-status and precarious status residents so that everyone is properly informed of the City's policy. Staff and volunteers should be able to answer basic questions regarding the City's Access Without Fear Policy without providing false or misinformation or denying someone access to a program or service due to lack of policy or protocol knowledge. Based, on our experience conducting workshops and training in Toronto over the past nine years, we recommend that Access Without Fear language and information be added to all current City training materials and procedures. This training should include information on:

- The rationale behind adopting a City-wide Access Without Fear motion.
- How and why immigrants lose status in Canada?
- What are the specific needs in terms of service provision for immigrants without full immigration status?
- What are the privacy and confidentiality policies governing collection/storage/access/sharing of personal information?

- How fear amongst non-status people is detrimental to service accessibility
- What to say and what not to say when communicating with non-status clients?
- What are the rights and responsibilities of citizens and non-citizens with respect to immigration enforcement?
- How to make referrals for clients without full immigration status.

2. The city should develop a broad web-based video and multi-lingual information page to be shared with all City staff, volunteers and City-funded service providers, which includes this information and protocol requirements for City staff and volunteers. This should be done in coordination with the language access initiatives described in the public education section (Appendix B). Metrics for the success of training programs can be developed for testing later in the implementation phase of Access Without Fear.

3. All City and City-funded agency should additionally

a. *Develop an Access Without Fear policy:* A simple way of developing a culture of Access Without Fear (which covers dimensions of training and public education) in City-run spaces (and in the City more broadly) is to ask all offices and spaces covered by the policy to develop an Access Without Fear policy tailored to their own spaces.

b. Develop protocols:

These protocols must include all of the information outlined in bullet points above, but adapted to the specifics of that service site.

4. Amending intake/registration forms:

Through an internal audit, community consultations, and directives to staff and volunteers, we recommend that all City services and city-funded agencies that currently collect immigration status information from a resident create a separate intake form to record such sensitive demographic information. This optional form would be used solely for statistical purposes for community agencies that require such information for funders or for advocacy purposes, and would not contain any personal identifiers (i.e. name and home address). At times when it is necessary to ascertain one's immigration status, the City's Access Without Fear policy must be clearly affirmed. We recommend clear policy guidelines be developed on how immigration status information compiled on these forms is protected and stored, who has access to such information must be disclosed, and staff and volunteers must be prohibited from sharing immigration information with Federal immigration or law enforcement. Further, one's privacy and confidentiality must be strictly maintained at all times.

5. Language:

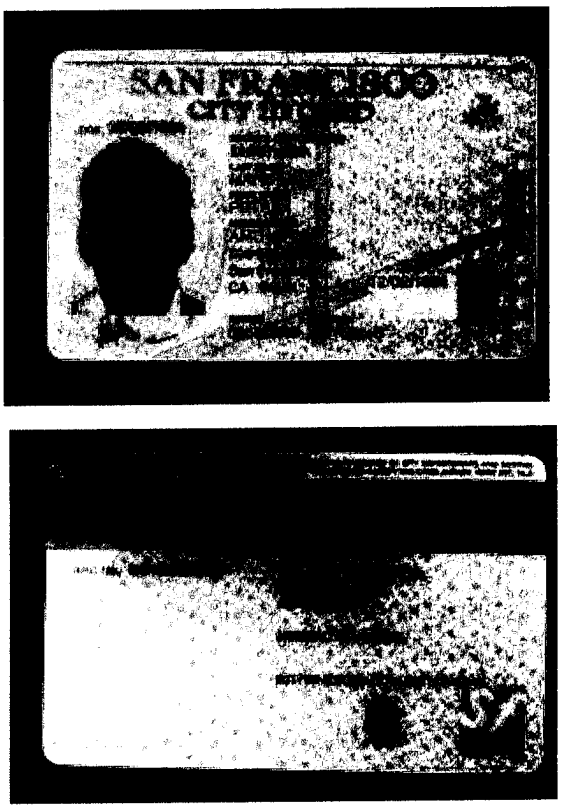
For many Toronto residents, English is a second or third language. This poses a significant barrier to their capacity to fully exercise their rights as outlined in the City's Access Without Fear policy. As in San Francisco and Chicago, we recommend a long-term strategy for developing a language access plan required of all departments, particularly those identified as having a strong relationship with precarious status clients. This targeted approach should be combined with a multi-lingual system of online and print information clearly outlining residents' rights granted under this policy.

Municipal ID cards

Most municipal services require some way of gathering address information to build a client profile. Some cities in the U.S. have instituted municipal identification cards, but this would have to be done with clear parameters on the sharing of personal information with Federal immigration authorities. We want to emphasize that no municipal ID card program should be put in place where the identities or addresses of people applying for cards is ever maintained as a record. There is particular laser technology that is in use in San Francisco that allows for such a municipal ID card – all other technology maintains a database which other levels of government can subpoena or otherwise access and should therefore not be used. Figure 1 provides an example of what the San Francisco City ID Card resembles.

We recommend that the City study the various forms of municipal ID cards that have been introduced in many U.S. jurisdictions, and explore the possibility of adopting a Toronto Municipal ID card that could be used by all Toronto residents. This can particularly benefit many vulnerable groups (i.e. youth, newcomers, homeless, etc.) who may have difficulty in accessing regular forms of identification.

Fig. 1. San Francisco Municipal ID Card



Ensuring accountability

Non-status residents need a safe and confidential method of being able to lodge a complaint against a City staff member, volunteer, department, or agency that has either: refused them service or access to a program, requested that a person divulge their immigration status when such information was not necessary, or have been subject to mistreatment or derogatory comments that were threatening, racist or degrading. The City must develop a step-by-step multi-lingual information guide for non-status residents about where they should register complaints or how to proceed if they have been denied service/program access.

Residents who have been denied access to services or programs based on their immigration status can be directed to Toronto's Human Rights Office to file a complaint. San Francisco's Sanctuary City complaints process similarly goes through the Human Rights Commission and Chicago has created a position within the 'Office of New Americans' to receive and process such complaints. As very few undocumented residents will actually approach the Human Rights office based on their precarious legal and life status, we urge that ALL complaints be investigated, rather than the Human Rights office determining whether a formal investigation is appropriate.

Additionally, we recommend that the City:

- Actively promote their complaints procedures in outreach materials
- Update the current Human Rights Office online complaints form to include discrimination based on "immigration status"
- Allow for anonymous complaints, a secondary contact person if desired, and/or emphasize the safeguarding/confidentiality of personal information
- Allow for complaints by community organizations
- Provide residents with updates on complaints investigation status/resolution
- Develop extremely precise enforcement mechanisms so that staff, volunteers or agencies face real punishment and penalties for violating the City's policy. It is important this be a City-wide structure and not left to department heads so that consistency is maintained.

We also recommend that the City's Ombudsman monitor and track such complaints especially during the first two years of implementation. Following is an outline of the City of Toronto's current complaints protocols with our recommendations embedded.

Residents are first encouraged to register their complaint regarding a City service directly at the point of service/program or related City department.[13]

A resident can call 311 to find out who they can register their complaint with. A resident

[13] Flowchart on general complaint handling guidelines: http://www.toronto.ca/customerservice/docs/complaint_handling_guidelines_chart.pdf

can contact the Office of the Ombudsman if they have not been able to resolve problem through the City department.

Toronto's Human Rights Office can also deal with complaints around access to City Services.[14] Current Human Rights procedures[15]:

C - Complaints Procedure for Residents and Recipients of Municipal Services	**1. Jurisdiction:** Under this section, complaints may be made to the appropriate City division or the Human Rights Office. Residents and service recipients may complain under the policy about discrimination and harassment in the administration and delivery of City services, access to and use of City facilities, occupancy of City-owned accommodations or discrimination in legal contracts. The Human Rights Office has no jurisdiction over acts or procedures (i.e., policy decisions) of Toronto City Council or its Committees. In addition, residents and service recipients may be required to exhaust any other avenues of appeal which are reasonably available prior to making a complaint under the policy. As this complaints procedure is a mechanism for alternative dispute resolution, a mediation or investigation may be terminated if either party to the complaint retains legal counsel during the mediation or investigation. **2. Divisions:** Where appropriate the complaint will be referred to the manager of the appropriate service delivery unit to allow that unit an opportunity to resolve the matter. ***Our recommendation: Undocumented residents live very precarious lives and are an extremely vulnerable population. Lodging a complaint at the department where they are being denied services, but also where they have no choice but to access services, will be difficult. Repeatedly, communities we work with highlight fear as the most pressing obstacle in their lives – thus we recommend that all complaints remain at the Human Rights Office and not be sent to the division.*** **3. Early Resolution:** If the resident or service recipient is unable to resolve their problem directly with the division, the Human Rights Office, may try to mediate a solution. **4. Formal Complaint and Investigation:** If early resolution does not resolve the situation, the Human Rights Office will assess the merits of the complaint and determine whether a formal investigation is appropriate to resolve the complaint. If a formal investigation is necessary, the Human Rights Office will prepare a complaint form based on the resident's information. Once the complaint form is signed by the complainant the Division Head and Deputy City Manager or City Manager as appropriate will be notified and required to respond.

[14] The online complaints form can be found here: https://wx.toronto.ca/inter/cmo/humanrights.nsf/complaint?openform

[15] http://wx.toronto.ca/intra/hr/policies.nsf/9fff29b7237299b385256729004b844b/b56b633e5572ee618525746e006a2656?OpenDocument

	Our recommendation: As we explain earlier, because so few complaints will actually be lodged, each of those must be accompanied by a detailed investigation so as to build the trust of undocumented Torontonians. **5. Settlement:** The Human Rights Office will keep both parties advised of the progress of the investigation. With the consent of both parties, the Human Rights Office may attempt to mediate a settlement of a complaint at any point during an investigation. If a settlement is reached, the matter is closed and no investigation report is written. **6. Investigation Report:** The investigation report formally tells both parties what relevant information the investigation discovered, on which the Human Rights Office will base recommendations. **7. Commenting on the Investigation Report:** The investigation report is disclosed to the resident or service recipient and the involved division. Both parties will be given 15 working days to individually review the investigation report and submit written comments if they believe the report missed or misstated any information which would have a bearing on the outcome. **8. Recommendations:** The Human Rights Office may make recommendations to correct any existing problems and/or to prevent similar problems from occurring in the future. **9. Final Decision:** The Division Head and City Manager or Deputy City Manager as appropriate, or designate, will review the investigation report and any recommendations and provide the parties with a final written decision within 30 days. ***Our recommendation: It is imperative that a protocol be developed to ensure that departments in fact implement the policy and clear penalties be outlined for staff, volunteers and city-funded agencies that are in violation of the City policy.***

Bridging the awareness gap

Policies are ineffective unless the residents to whom they apply are aware of their existence or are informed of their rights. We therefore recommend the following steps to ensure that non-status residents are made aware of Toronto's Access Without Fear policy:

Public Education and Outreach: An online "portal" explaining the City's new policy with full translation of the services and programs covered into as many languages as possible. Following the example of Chicago, targeted community outreach can be facilitated by way of "Welcome Stations" – physical resource centers where multi-lingual resources explaining City services and access policies are made available. Key sites for such centres can include schools, community centres and libraries. The City

of Toronto can replicate some of its strategies during past successful public education campaigns that we have compiled in Appendix B of this document.

We also recommend a broad public education and/or awareness-raising campaign aimed at all Toronto residents in order to eliminate discrimination and dispel myths held by many against undocumented migrants.

Community Media: Community and ethnic media should be utilized as a means of announcing the City's policy. A multi-lingual (this could be a single template with several versions) announcement system detailing what services are covered and affirming the City's commitment to Access Without Fear should be distributed through community print, radio, web, and televised media.

Public Signage: Many of the food banks we work with have clear signs at their front desks stating that the agency serves all people regardless of immigration status. Similarly posters were developed at the Toronto District School Board which stated that all students regardless of immigration status were welcome. We recommend a similar "Everyone has a Right to Services" signage strategy placed across the city's multiple service access points.

Community leaders: We recommend a multi-year plan be developed to assess the effectiveness of Access Without Fear policy as it is implemented in different parts of the City, through different departments, and with diverse constituencies. To this end, community liaisons should begin forming immediately, with input from community organizations already involved in or with a relationship to non-status communities.

This will need a robust outreach plan to increase community participation and ensure that voices of undocumented and precarious status residents and their concrete experiences define the most effective means of implementation. Many community networks and leaders already exist working directly with a number of undocumented communities and should be approached for initial input on how to build this outreach system.

Appendix A: Best Practices Summary: San Francisco, Chicago and Dayton

TRAINING

SAN FRANCISCO	CHICAGO	DAYTON
• Focused trainings developed specifically for each department; eg., the juvenile and youth areas had their own specific issues with how undocumented children came into the system and what happened to them; the police department had their own issues and goals for implementing Sanctuary City Ordinance (to enhance community safety) • Training developed on how to work with undocumented youth who are caught up in the system Frequently Asked Questions • Sections dedicated to "what not to do" specific to front line staff for various departments	• Massive service review initiated, with focused intensive multi-day training in targeted services • Identification of focus areas based on non-status use • Office created specifically to deliver broader plan, which includes positions developed to develop training program for other City staff • Had specific staff designated to communicate ordinance to other staff • Long-term community consultation plan to ensure that community-led training program is developed over time	• Massive service review initiated, with focused intensive multi-day training in targeted services • Identification of focus areas based on non-status use

COMPLAINTS

SAN FRANCISCO	CHICAGO	DAYTON
• The Human Rights Commission oversees sanctuary ordinance compliance, investigates complaints against city agencies, issues rulings, assists with training city departments on sanctuary, investigates emerging issues in San Francisco that affect the implementation of sanctuary • The Office of Civic Engagement & Immigrant Affairs (OCEIA) manages education and outreach on access to city services, and oversees language access, funds	• Mostly goes through 311 • Sometimes passed on to Human Relations Commission or the Office of New Americans (created specifically to deliver the Welcoming City plan, which included an extended Sanctuary policy) • Police do an internal adjudication • *Suggestions:* Creation of an Ombudsman	• Building clearinghouse of services to record complaints specifically around the sticking power of the Sanctuary ordinance • Positions created to adjudicate complaints through Human Relations Council

community organizations to do immigrant related work (around language access, applying for legal status, and seeking employment as domestic workers and day laborers). Every year, OCEIA issues an annual report on language access in all of the city departments that work with the public (all city departments send them a report on their department's provision of their services in other languages and OCEIA compiles that information and issues their own report).	role/Community Relations Position/Compliance role, either as new position or as profile within already existing position	

REVIEW/IMPROVING AWF

SAN FRANCISCO	CHICAGO	DAYTON
• California state law on how to cope with families separated due to deportation; deporting parents increases the burden on courts and the foster system; Federal immigration should not obstruct parents from attending court hearings on child custody • City resolution (November 22, 2011) restricts using local funds to respond civil immigration detainers; Federal immigration policies harm public safety by increasing fear in immigrant communities; municipality has no obligation to help Federal immigration(unless a warrant is issued to arrest an individual known to be armed and violent); and it is understood that Federal immigration misrepresents the facts to get support from municipal workers • San Francisco Ordinance No. 274-07: the County Clerk to issue municipal identification cards upon request to residents of the City and County of San Francisco;	• Requiring different departments to develop language access plans, outlining how they will improve access • Cultural sensitivity training in other areas of City policy will include a commitment to not check immigration status, conversation around immigration status, etc • Convened committee of healthcare providers to talk about immigrant health needs, and used this as platform to improve ways to serve the uninsured • Developed "Citizenship Corners"...safe spaces where confidential workshops on pathways to residency/status available	• ID card considered one of many options • Systemic review of existing local laws and institutional practices that might create barriers to access • Active lobbying commission to be developed of City agents to look at specific state/Federal policies limiting access • This commission supposed to identify lead agencies and actors that might lead that effort • City to lead community dialogues on how to make City more immigrant-friendly, focusing specifically on status • Creating community advisory boards, to meet regularly, on issues of

many members of San Francisco community (children and youth, the elderly, homeless, immigrants, students, and transgender individuals) lack government issued ID which makes life in the City more difficult; this also raises public safety concerns • San Francisco City Resolution No. 135-12 on how the municipality will work with Federal immigration bodies; individuals can only be detained for Federal immigration authority if convicted of a violent felony; safeguards should be in place against police profiling of undocumented citizens and wrongful detention.		access facing specific communities....seats supposed to be created specifically around issues of status

PUBLIC EDUCATION

SAN FRANCISCO	CHICAGO	DAYTON
• City employee training and public awareness campaign developed by the "Public Awareness Campaign Workgroup" (ad hoc) that met to discuss the design concepts for a media campaign, two graphic design interns hired from local fine arts college to develop campaign materials • Public education campaign had specific timeline that was followed • Materials included: informational brochures, PSA (radio/TV), possible radio ads, Municipal car cards, posters, kiosks, newspaper ads (specifically in various ethnic media), possible billboards • Materials were developed	• Campaign launched with language access policy up front, consolidating different communication streams into consistent guidelines • Online portal developed out of community consultation to speak to immigrant needs (including business workshops, community organizations, etc)...this now includes AWF type component • Welcome Stations created (physical resource centers in libraries, schools, etc) with multi-lingual resources on AWF, immigrant needs, and services available. Space (when more than a booth) is used by community	• Set up "Welcome Dayton" committee to discuss this specifically, find best communication strategies for different sectors and to inform cross-funded sites of new policy expectations • Used major institutional "partners" in service delivery (United Way, Red Cross, etc) to use own networks to inform of the policy

targeting certain immigrant communities • Rallies and events held to get the message across to various communities	organizations to hold workshops.	

Appendix B: Examples of City of Toronto Education Campaigns

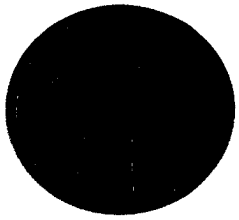
YEAR	CAMPAIGN	DESCRIPTION
2012	Child Safety in the summer	Fire fighters and Blue Jays team up on this campaign, which includes a fire safety day at a Blue Jays game and posters and banners to hand out to kids.
2012	Boosting women's presence in local politics	Women counsellors are matched up with young women for job shadowing and mentorship.
2011	Reducing residential fire deaths to zero	Fire inspectors go door-to-door to ensure smoke and carbon monoxide alarms. Information provided to residents
Annual	Idle-free campaign	Public education and advertising campaign ("4-day blitz") to educate the public about the effects of idling vehicles on air quality.
2009	Put Food in the Budget campaign (call to Ontario to introduce $100 healthy food supplement for all adults on OW)	Toronto's Medical Officer of Health Dr. David McKeown and community agencies serve soup on Queen's Park lawn to put pressure on the legislature to introduce $100 healthy food supplement for all adults on OW. City of Toronto acts as an ally to other organizations.
2006	"Do the Sleeve Sneeze"	Messages in newspapers, bus shelters, subway platforms, and flu clinics, posters and fact sheets
2006	Live with Culture subway campaign	One-month campaign to bring culture into the TTC. Art installations and performances in Eglinton station for 1 month.
2005	"Go Natural" gardening campaign	Newspaper ads, point-of-purchase information at gardening and hardware stores about pesticide-free gardening. City staff at malls to answer questions, multi-lingual media outlets and community-based education sessions. This was a phase-in to the Pesticide By-law.
2004	"Spanking hurts more than you think" campaign	Everyday images used to illustrate the negative impacts of hitting children. Campaign in collaboration with community partners.
2004	Campaign for more Provincial funding for childcare	Brochures distributed to parents at child care centres urging them to call MPP to say that Toronto receive adequate funding for child care.
2004	InvolveYouth Campaign	Advertising posters in TTC vehicles and transit shelters, guide for community organizations on involving youth in decision-making, workshops for community organizations.
2000	Eliminating red light running	Advertising in transit shelters, buses, and radio for 4-6 weeks. The outdoor advertising features a funeral scene with the headline "It Won't Kill You To Stop." The traffic signal logo below says "Don't Run a Red."

THE
LAW UNION
OF ONTARIO

PARKDALE
COMMUNITY
LEGAL SERVICES

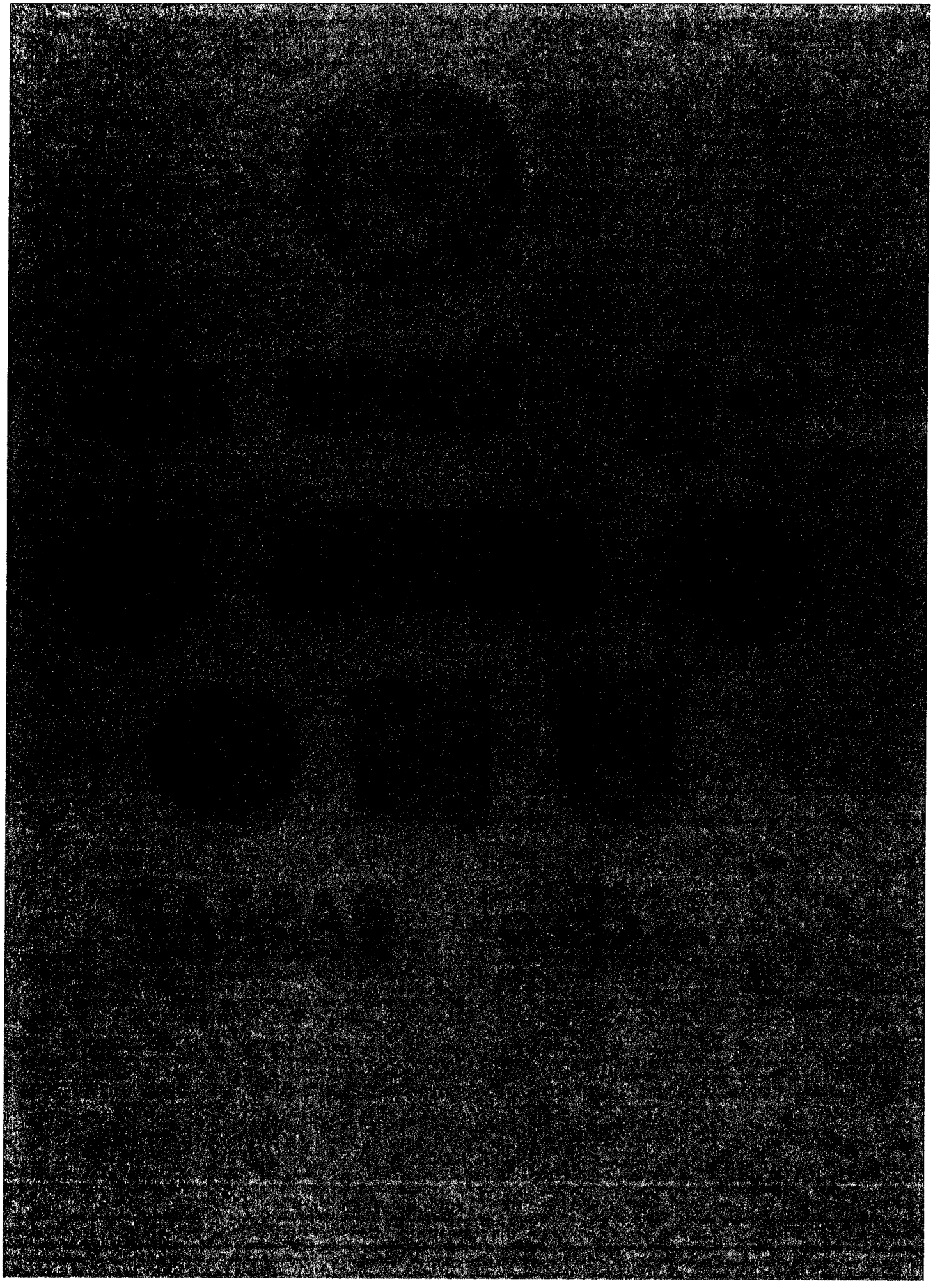
SOCIAL
PLANNING
TORONTO

WORKERS'
ACTION
CENTRE



SALCO
South Asian Legal Clinic of Ontario

ASAAP
ALLIANCE FOR SOUTH ASIAN AIDS PREVENTION



CD29.11.1

Access to City Services for Undocumented Torontonians

Solidarity City Network proposed amendments to recommendations on item CD29.11 "Access to City Services for Undocumented Torontonians"

For consideration by the Community Development and Recreation Committee, May 22, 2014

The Solidarity City Network was formed in 2012 to work with the City of Toronto to pass Canada's first Access without Fear (Sanctuary City) policy in February of 2013. The Solidarity City Network includes Toronto residents as well as members of Alliance for South Asian Aids Prevention, Health for All, Immigration Legal Committee, Justice for Migrant Workers, Law Union of Ontario, No One Is Illegal – Toronto, Ontario Coalition Against Poverty, Parkdale Community Legal Services, Roma Community Centre, Social Planning Toronto, South Asian Legal Clinic of Ontario and Workers Action Centre.

Since then, the Solidarity City Network has prepared "Know Your Rights" materials for front line service providers and communicated the new city policy directly to Torontonians without full immigration status.

In the summer of 2013, the Solidarity City Network researched the state of service delivery by Toronto city funded agencies. We audited childcare services, health care clinics, emergency shelters, and food banks. 75% of the 185 services we called agreed to serve undocumented people, 25% refused. Of the 75% of the city services that said they were accessible, the vast majority requested documents that undocumented people are afraid to provide. It is clear that while service providers want to serve undocumented clients, they lack the tools to do so. Based on this research, the Solidarity City Network made recommendations to Toronto City staff to implement Toronto's Access without Fear policy and has consulted both formally and informally with city staff in Social Development, Finance and Administration.

We greatly welcome the recommendations provided by the Executive Director to the Community Development and Recreation Committee. These recommendation must be strengthened, resources allocated and urgently implemented so that the promise Toronto made fifteen months ago finally comes to fruition.

Proposed changes to recommendations

The Solidarity City Network urges the Community Development and Recreation Committee to strengthen city staff recommendations by amending them with the following changes:

1. Amended recommendation: City Council direct that immigration/citizenship information only be collected where specifically required by either provincial or federal legislation, policies or agreements <u>and direct that this information shall not be shared outside the City division, agency or corporation which has collected it, unless through the informed consent of the Toronto resident to whom it concerns;</u>

Recommendation as currently drafted: 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. Amended recommendation: 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; City Council should also direct City divisions, agencies and corporations granting funds to ensure that municipal grant recipients comply with the City's position on access to services for undocumented Torontonians as a condition of receiving funding or support, excluding those specific services which may be provincially and federally funded;

   Recommendation as currently drafted: 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. Amended recommendation: City Council direct the Executive Director, Human Resources, and Executive Director, Social Development, Finance and Administration, and other City division, agencies and corporations as required, to implement a compulsory training program to inform, educate and train all appropriate City staff and volunteers 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;

   Recommendation as currently drafted: 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. Amended recommendation: City Council request the Director, Strategic Communications, and the Executive Director, Social Development, Finance and Administration to implement a Communications Plan to inform all City staff, community organizations and Torontonians of 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;

   Recommendation as currently drafted: 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. Amended recommendation: City Council request that the General Manager of Children's Services advocate with Ministry of Education officials regarding guidelines for accessing child care fee subsidy for immigrants without full status or full status documents;

   Recommendation as currently drafted: 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. Amended recommendation: City Council direct a City Task force be formed to advocate to the Provincial government to review the Ontario Works legislation and residency policy with a view to ensuring access to social services for undocumented Torontonians;

   Recommendation as currently drafted: 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. Amended recommendation: City Council work to promote its Access without Fear policy to other municipal governments across Canada and assist them in developing similar policies; Council should also work in collaboration with other municipal governments to advocate to Provincial and Federal governments to reconsider immigration and refugee policies, in order to facilitate access to social assistance, health care and housing for undocumented Torontonians.

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

8. Proposed recommendation by Solidarity City Network: City Council direct City divisions, agencies and corporations to evaluate and annually report on its review of Access without Fear policies and procedures, training and communications/public education strategy and include mechanisms to obtain community feedback

9. Proposed recommendation by Solidarity City Network: City Council direct the Executive Director, Equity, Diversity and Human Rights to revise the City of Toronto's Human Rights and Anti-Harassment/Discrimination Policy to include "immigration status" as a prohibited ground of discrimination to ensure consistency with Council's commitment to City services for undocumented Torontonians and direct the Executive Director, Equity, Diversity and Human Rights to develop a mechanism to enable third party complaints on behalf of undocumented Torontonians;

10. Proposed recommendation by Solidarity City Network: City Council direct the Executive Director, Social Development, Finance and Administration to continue exploring the viability of introducing a City of Toronto Municipal Identification Card through conversations with U.S. municipalities who have adopted them

11. Proposed recommendation by Solidarity City Network: City Council direct the Toronto Police Services Board to work with the Chief of Police and review existing policies to ensure Police Services comply with Toronto's Access without Fear directives