

Written Submission for the Pre-Budget Consultations in  
Advance of the 2023 Federal Budget

By:

OCASI – Ontario Council of Agencies Serving Immigrants

To Standing Committee on Finance

October 2022

Recommendation 1 – Establish a minimum core funding threshold that invests in quality services and decent work for the non-profit immigrant and refugee serving sector and the larger non-profit sector.

Recommendation 2 – Review and revamp the immigration and refugee system

Recommendation 3 - Advance racial equity and eliminate racial discrimination

Recommendation 4 – Make targeted investments to advance gender equality

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**Recommendation 1 – Establish a minimum core funding threshold that invests in quality services and decent work for the non-profit immigrant and refugee serving sector and the larger non-profit sector.**

The non-profit sector, including the immigrant and refugee-serving sector, was hit hard by the pandemic. Even before the pandemic the non-profit and charitable sector had faced decades of neglect and underfunding, while grappling with counterproductive funding guidelines and operational rules, such as a 15% cap on administration and funder demands for resource-intensive administrative reporting without the resources to carry out the work. Organizations must rely on project-based funding which does not let them build core capacity or long-term sustainability. They are limited in their ability to improve services or develop new programming to meet community needs, or to innovate. The core activities needed to keep an organization going, such as overhead, financial management and administration, governance, human resources management, technology, communication, etc., as well as fulfill the organization's mission, are often not included in project funding or not sufficiently resourced.

Recommendations in the 2019 Catalyst for Change Senate Report that address streamlined reporting requirements, project length, and full coverage of associated administrative costs have not been fully implemented.

Certain organizations face additional exclusions and systemic barriers rooted in racism and prejudice and are severely under-resourced - such as organizations founded by, or that serve historically disadvantaged groups including Black and racialized communities, women, racialized people with disabilities and racialized LGBTQ+ groups.

The immigrant and refugee-serving sector is staffed predominantly by women, racialized people, and those of refugee and immigrant background. Jobs in the sector, especially those in frontline and supports roles, are among the lowest-paid in the human services sector. While the cost of living has risen exponentially, wages in our sector have not kept up. Sector agencies are unable to staff critically needed positions, in large part because they cannot pay competitive wages not meet decent work standards.

We agree with recommendations in the [Alternative Federal Budget: Rising to the challenge](#) and the Imagine Canada submission to this Committee on adequately supporting Canada's non-profit and charitable sectors.

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We recommend:

- Increase funding for settlement and integration services, especially to encourage digital service delivery and hardware acquisition;
- Make permanent the de-coupling of administration from program spending as is the current temporary practice;
- Budget for increasing staffing resources to address the backlogs across all immigration streams including the anticipated regularization program;
- Create a new budget line for service agencies and their umbrella orgs to promote immigrant and refugee services to new arrivals;
- Ensure adequate funding so that the sector can attract, recruit and retain qualified staff.
- To be efficient and prudent in managing funds, agencies should be able to carry unspent funds from one year to the next.
- Improve project-based funding as recommended in the 2019 Catalyst for Change Senate Report.
- Review and revamp core funding to remove structural inequalities and systemic barriers.

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## Recommendation 2 – Review and revamp the immigration and refugee system

The COVID-19 pandemic and response by all orders of government more clearly exposed the persistent and ever-deepening inequities and contradictions in Canada's immigration program. Most severely affected were people with precarious immigration status, including migrant workers, international students, refugee claimants, and those without a work permit, study permit, or another temporary resident status. Among these groups, people who are Black and otherwise racialized, women, 2SLGBTQ+, and people with disabilities were disproportionately affected. The Immigration Minister's mandate letter includes a directive to regularize the status of undocumented workers. While IRCC is reportedly looking at expanding existing programs to include more workers, we are concerned that these efforts will be too narrow and will exclude some of the most disadvantaged undocumented people in Canada.

A 2021 report based on focus groups with employees at Immigration, Refugees, and Citizenship Canada (IRCC) revealed anti-black racism and racism within the department. IRCC's response is focused primarily on managing relations with racialized employees, but stops short of addressing deeply embedded structural race-based inequalities, systemic discrimination, and bias in the entire immigration and refugee system.

We recommend:

- An independent review of the Seasonal Agricultural Worker Program, immigration legislation, bilateral agreements, and all immigration programs and practices to eliminate structural and systemic racial discrimination and align them with real labour market needs, ensure they respect human rights, and meet humanitarian obligations. A panel that includes representation from affected communities and sectors will conduct the review and invite testimonies from community members, including people without immigration status;
- A comprehensive and inclusive immigration status regularization program that will include status for all migrant workers on arrival. Such a program will allow undocumented residents to become permanent residents without first having to meet restrictive criteria such as proof of official language ability, income level, work or study experience, and health status;
- End all immigration detention and pursue alternatives in situations where detention is judged to be necessary and end the use of tracking bracelets as a mandatory condition of alternative detention;

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- Establish an independent, fully resourced oversight body for the Canada Border Services Agency;
- End the Canada-U.S. Safe Third Country Agreement;
- Open access to federally funded immigrant settlement services to all who need it (at an estimated cost of \$5 million a year) and exempt non-profit organizations and their employees from sanctions for providing free immigration services to their clients, as per IRCC's interpretation of Section 91 of the Immigration and Refugee Protection Act (IRPA);<sup>2</sup>
- Repeal criminal inadmissibility in IRPA to remove double punishment and amend the Quarantine Act to ensure temporary foreign workers are not penalized for their employers' failure to comply with quarantine measures;
- Remove the minimum necessary income criteria for the parent and grandparent sponsorship program, remove the numbers cap, end the lottery system and process every application;
- Increase family-class immigration to 35% of total annual immigration;
- Reset the economic immigration program to be consistent with real labour market needs and work deemed to be essential during pandemic closures. Future immigration selection must include all occupations and all skills, including, but not limited to, all work in the food supply chain, health care, and long-term care—jobs that are currently filled year after year by temporary migrant workers;
- Make all pilot programs permanent, including programs for domestic violence survivors, caregivers, vulnerable workers, and undeclared family members, while relaxing the rules for the agri-worker pilot program and expanding it to other workers and sectors;
- Eliminate citizenship fees, as promised by the federal government, and eliminate the requirement for up-front proof of official language knowledge. These are systemic barriers that have a disproportionate impact on low-income people and particularly Black and racialized women;
- Eliminate the massive processing backlogs (more than 1.2 million across all categories in May 2022);

Additionally:

- Strongly encourage the provinces and provincial regulatory bodies to streamline the recognition of foreign credentials and experience;
- Immediately remove all immigration status barriers and residency period barriers to accessing income supports and benefits, including the Canada Child Benefit, Old Age Security, Guaranteed Income Supplement, and Employment Insurance;
- Strongly encourage the provinces and territories to also remove all immigration status barriers and residency period barriers for social assistance;

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### Recommendation 3 – Advance racial equity and eliminate racial discrimination

Indigenous, Black, and racialized communities have always been among the most marginalized in Canada. Structural racism, deeply rooted in Canada's settler-colonial origins and the enslavement of African peoples, produced laws and policies to restrict their social, economic, and cultural rights, and often exclude them from Canadian society. Despite the enactment of the Canadian Charter of Rights and Freedoms (1982), systemic racism persists in Canadian society.

COVID-19 has focused attention on and exacerbated the longstanding inequities faced by racialized residents. Black communities faced much worse health outcomes compared to others. Almost all racialized communities have reported an increase in hate crime. Most notably, there has been a dramatic spike in anti-Asian racism and anti-Muslim hate, in addition to the continued high numbers of ongoing anti-Black and anti-Indigenous racism.

Governments in Canada have long refused to collect consistent race based disaggregated data, and seem unlikely to maintain health-related disaggregated data collection activities that were in place at the height of the pandemic. Lack of data, particularly lack of comparable data, makes it almost impossible to measure the true impact of systemic racism on all life outcomes for racialized people.

We recommend:

- Create an Anti-Racism Act that will name and address all forms of systemic racism, racism, and hate to provide a legislative foundation for an independent Anti-Racism Secretariat that reports directly to parliament and has its own budget; and create a National Action Plan with metrics to accompany the national Anti-Racism Strategy, containing concrete strategies with actionable goals, measurable targets, timetables, and necessary resource allocations for each strategy and to fund community-based efforts across Canada to address all forms racism and hate;
- Include an intentional racial equity framework in the GBA+ budget, federal Poverty Reduction Strategy, the National Housing Strategy, and the Canada-wide Early Learning, Childcare Plan and mandate a racial equity framework for all reviews, including a review of COVID-19 relief spending and funding programs by federal government departments and specific action plans on eliminating racial disparities and inequalities in Indigenous, Black, and racialized communities in the respective areas targeted by the strategies;

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- Create a Fair Wage Commission to set fair increases in the minimum wage for other governments to follow
- Maximize the disaggregated data collection allocation (Budget 2021 provided \$172 million over five years towards the collection of disaggregated data based on race and other socio-demographic identities in the key areas of the labour market; economic inequality and poverty; the criminal justice system and access to justice; child welfare; environmental racism; health and mental health; housing; social and cultural benefits; education; refugee protection, interdiction, and immigration (including recruitment of migrant workers); citizenship legislation and policy; and media, social media and mass communications. Include a clause to ensure racial equity with disaggregated data collection in health transfers to provinces and territories;
- Strengthen the federal Employment Equity Act and attach employment equity measures through Community Benefit Agreements to all federal investment and recovery programs to ensure racialized groups and other under-represented groups have equitable access to any new jobs created; and eliminate the use of 'visible minorities' in the Act;
- Integrate Community Benefit Agreements within infrastructure and housing spending to ensure the inclusion of racialized workers, apprentices, and businesses within the supply chain.

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## Recommendation 4 – Make targeted investments to advance gender equality

The greatest and deepest economic, social and health impacts of COVID-19 were felt by racialized and migrant peoples, particularly women, and those who are living on low-incomes and experiencing intersecting inequalities based on race, class, disability, education, and migration and immigration status. Racialized women are disproportionately affected by the gender pay gap, and faced greater exposure to COVID-19 across multiple sectors. Violence against women increased significantly during the pandemic. Racialized and refugee and im/migrant women often face significant systemic barriers in accessing safety and needed supports and resources.

We recommend:

- Provide targeted funding for racialized, refugee and im/migrant communities to appropriately address gender-based violence.
- Make targeted investments in immigrant and refugee women's organizations and programming.
- Commit \$25 million per year over five years for renewed multi-year capacity-building grant funding for women's and gender equity organizations (OCASI supports the written submission from the Coalition of Women's and Gender Equity Organizations and Allies

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