CONTINUING WELCOME:

A PROGRESS REPORT ON *A HALF WELCOME*

June 2020

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CITIZENS FOR PUBLIC JUSTICE

In mid-2019, Citizens for Public Justice (CPJ) began a collaboration with MCC Canada, World Renew, and the Christian Reformed Centre for Public Dialogue to animate CPJ's 2017 study, *A Half Welcome*, through community engagement and advocacy on Parliament Hill and in various constituencies. The coalition is grateful for the input from Ellen Woolaver and Debra Simpson of the SAH Secretariat.

A key asset in this advocacy is our connections to refugee sponsoring communities and their ability mobilize sponsors for constituency-level citizen advocacy. To support this work, CPJ has produced this progress report on *A Half Welcome*, focusing on the ongoing needs and concerns for refugees. As a coalition, we are cognizant of the federal government's efforts to welcome refugees and for the hospitality, cooperation, and support offered by Canadian citizens through the Private Sponsorship of Refugees Program. We also know that continuing dialogue and policy development is essential for a deepening welcome. We hope that this progress report will inspire helpful interaction with parliamentarians in Ottawa and in constituencies across the country.

EXECUTIVE SUMMARY

This report analyses the federal government's efforts to address the refugee sponsorship challenges raised by Sponsorship Agreement Holders in *A Half Welcome* (2017). Their top concerns were long wait times and backlogs, allocation limits, and travel loan repayments.

While there have been some improvements in the refugee resettlement process, significant gaps remain. Prior to the emergence of the COVID-19 pandemic, processing times and the clearance of refugee sponsorships backlogs were slowly improving. On allocation limits, the government should be applauded for reintroducing the much advocated for multi-year immigration levels plan which allows for more predictable sponsorship planning. While the repayment of refugee travel loans has been eased, more can be done. Canadians and permanent residents currently sponsor more refugees than the federal government, defeating the principle of additionality where refugee resettlement is primarily the responsibility of government. Private sponsorship is meant to be additional.

The COVID-19 pandemic has disrupted the refugee resettlement sector globally. Sponsorship applications are piling up because they are not being processed. The federal government must be ready for this new backlog. Canada's annual immigration intake might not be achieved this year due to the pandemic. It is good that the government is being proactive by planning to quickly develop strategies, processes, and digital systems to cope with the "new normal" post-pandemic times.

Citizens for Public Justice recommends that the federal government continue reducing refugee and family reunification backlogs and processing applications in a timely manner; simplify the application process; waive travel loan repayments for all refugees; increase the number of government-sponsored refugees; improve communication with sponsors; and study the sponsorship ecosystem to structure a more appropriate assurance monitoring system.

The success of the private refugee sponsorship program depends on full cooperation between the government and the sponsorship community. There should be regular consultations to ensure SAHs' experiences and recommendations are taken into consideration. Constant communication between the stakeholders is key to any success.

BACKGROUND AND CONTEXT

Canada has a long history of hospitality, cooperation, and support for refugees, as evidenced by decades of strong leadership in welcoming refugees. Refugees have become an essential part of the diverse tapestry of Canada. In 1979, the Private Sponsorship of Refugees Program (PSRP) was established as a partnership between government, Sponsorship Agreement Holders (SAHs), and community groups to sponsor refugees from abroad. The program was successful right from the start in protecting 60,000 Indochinese refugees fleeing from conflict in Vietnam, Laos, and Cambodia. In recognition of this humanitarian work, the people of Canada were awarded the UN Nansen Medal in 1986—the first and, to date, only time the award was presented to an entire nation.[i] As a result, many countries are now emulating Canada's model of private refugee resettlement.

In 2019 Canada marked the 40th anniversary of the innovative PSRP. Through it, over two million Canadians have sponsored more than 327,000 refugees fleeing conflict, turmoil, and persecution in various parts of the world. In the last five years, Canadians' interest in the PSRP soared in response to the surge of refugees fleeing the Syrian civil war. The unfortunate drowning of three-year-old Alan Kurdi is what sparked the global attention to the Syrians' plight. The PSRP gained more prominence at this point with SAHs, churches, Community Sponsors (CS), and Groups of Five (G5) stepping in to spearhead the sponsorship of refugees. Operation Syrian Refugees resettled 26,172 Syrian refugees in Canada within 118 days, between November 2015 and February 2016.[1] Over 60,000 Syrian refugees have resettled in Canada since 2015.[2]

However, even with increased interest, CPJ's research revealed that sustained public support and engagement in the PSRP depended greatly on the elimination of policy barriers in private sponsorship. CPJ has released two reports which examine the main policy challenges SAHs face in resettling refugees. In 2014, *Private Sponsorship and Public Policy* reported on the political barriers to church-connected refugee resettlement in Canada.[3] In 2017, *A Half Welcome* was released as a follow-up. It examined the main policy barriers to sponsorship encountered by SAHs and community sponsors. [4]

PRIVATE SPONSORSHIP AND PUBLIC POLICY

Private Sponsorship and Public Policy analyzed political barriers to church-connected refugee resettlement in Canada. The barriers identified included long processing wait times, lack of government consultation with SAHs, and cuts to the Interim Federal Health Program (IFHP).

All SAHs surveyed in this study were concerned about policy issues and trends currently affecting the PSRP. They expressed concerns about long processing wait times and processing hurdles that jeopardize their sponsoring groups' future engagement in resettlement work. Their other major concern were the cuts to refugee healthcare coverage for refugees under the IFHP. Some attributed the decline in Canadians' interest to sponsor refugees to this cut. CPJ issued a call for action on Human Rights Day in 2013, demanding that the government reverse the cuts on health care coverage. The heads of the Anglican, Presbyterian, United, and Lutheran churches in Canada signed on.[5] Thankfully, the IFHP was reinstated for refugees after the 2015 election. The reduction in sponsorship levels after the removal of healthcare coverage and its subsequent rebound suggests that complicated policies do impede private sponsorship work.

i Established in 1954, the annual UNHCR Nansen Refugee Award is usually awarded to an individuals, groups, or organizations that offer outstanding service to the cause of refugees, displaced, or stateless people.

LIST OF ACRONYMS

BVOR:

Blended Visa Office-Referred – A government partnership with private sponsors to resettle refugees.

CCR:

Canadian Council for Refugees – A national umbrella organization that advocates for refugee and migrant rights.

CIMM:

Standing Committee on Citizenship and Immigration – House of Commons committee that studies matters related to immigration and citizenship.

CPJ:

Citizens for Public Justice – A national, progressive organization of members who are inspired by faith to act for social and environmental justice in Canadian public policy.

CPO-V:

Centralized Processing Office in Vancouver – Created in 2016 to temporarily support the processing of Syrian refugee cases.

CPO-W:

Centralized Processing Office in Winnipeg – An office that used to receive and assess all new PSRP applications prior to 2017.

CS:

Community Sponsors – Groups or organizations that sponsor refugees.

G5:

Group of Five – Canadian citizens or permanent residents who come together to sponsor refugees.

GARs:

Government Assisted Refugees – Convention Refugees Abroad Class whose resettlement is entirely supported by the Government of Canada.

IRCC:

Immigration, Refugees and Citizenship Canada – Government department responsible for matters dealing with immigration to Canada, refugees, and Canadian citizenship.

IRPA:

Immigration and Refugee Protection Act – An Act of the Canadian Parliament that builds the foundation for immigration policies, processes, and procedures.

JAS:

Joint Assistance Sponsorship – Joint sponsorship of vulnerable refugees by a group and IRCC.

PSRP:

Private Sponsorship of Refugees Program – A program in which Canadian citizens and permanent residents can engage in the resettlement of refugees from abroad.

ROC-O:

Resettlement Operations Centre in Ottawa – In 2017 the functions of CPO-W, CPO-V and the Matching Centre in Ottawa were merged into the new ROC-O.

RSAT:

Resettlement Services Assurance Team – IRCC team that monitors sponsorship disputes that relate to settlement or financial support issues arising during the sponsorship period.

SAHs:

Sponsorship Agreement Holders – Organizations (mostly faith-based) that have an agreement with the federal government to sponsor refugees.

SPO:

Service Provider Organization – An organizaiton that provides newcomer services including interpretation and document translation, help filling forms, language classes, job searching, and information about other community services.

A HALF WELCOME

In 2017, *A Half Welcome* was released as a follow-up to the *Private Sponsorship and Public Policy* report. It used qualitative and quantitative methods to examine the main policy challenges faced by SAHs. Four SAH representatives of the SAH Association from various provinces and organizations were interviewed.[ii] From their responses, a survey was created and disseminated to SAHs through the SAH Council. About thirty-two organizations, most of them faith-based in composition, completed the survey.

The report found that the success of Canada's PSRP depends on full cooperation between the government and the sponsorship community, including regular public-private consultations, to ensure that information provided to global partners truly reflects of SAHs' experiences and recommendations.

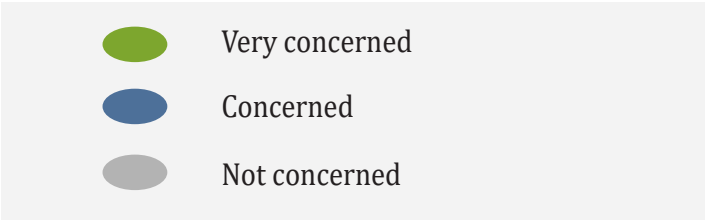
SAHs pointed out that inconsistent communication from visa offices affected the speed of decision making. They also noted that regular and consistent information on cases under review would mitigate the frustrations that wait times pose for SAHs and sponsoring groups.

SAHs raised concerns about the prioritization of Syrian refugees in the speedy processing of applications, the allocation of application numbers, and the travel loan policy. SAHs' responses in this study indicated that Canadian government private sponsorship policies require reform. The SAHs called for increased engagement through straightforward, simple, and equitable government policies to facilitate Groups of Five, Community Sponsors, and SAHs in their sponsorship endeavors.

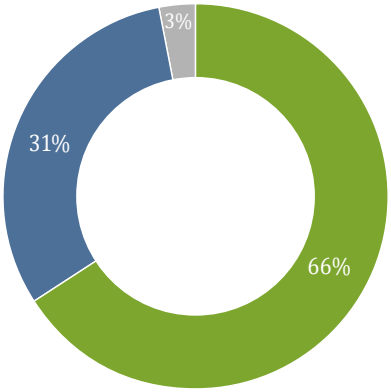
The following pie charts depict the top SAH concerns from *A Half Welcome*.

TOP CONCERNS FOR SAHS

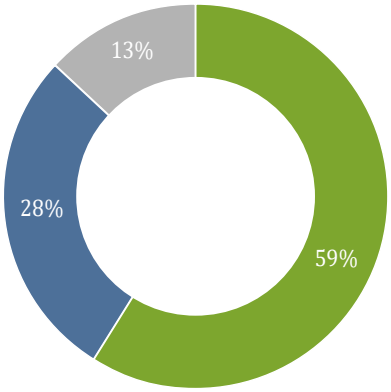
These pie charts below represent SAHs' opinions on the policy concerns raised in *A Half Welcome*. They have been arranged in order of issues of utmost concern to SAHs.



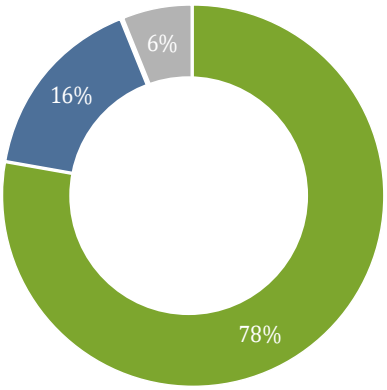
Wait Times



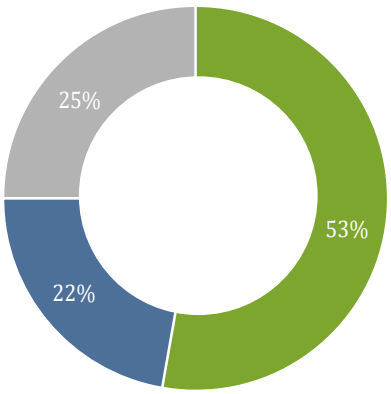
Allocation Limits



Wait Times for Non-Syrian Refguees



Travel Loans



ii The SAH Association is a national membership association for SAHs in Canada.

RECOMMENDATIONS FROM A HALF WELCOME

In *A Half Welcome*, SAHs called for transparent policy dialogue on long wait times and backlogs, allocation limits, and travel loans—the core barriers to private sponsorship. CPJ and our partners have engaged in continued advocacy on all three issues. Here, we track progress that has been achieved over the past three years.

WAIT TIMES AND BACKLOGS

Over 97% of the SAHs were concerned with the long wait period from when an application is filed, to when it is assessed, and to the eventual arrival of the sponsored refugees.

2017 Recommendation 1: The government must ensure that SAH, G5, and Community Sponsor applications are processed in a timely manner. Additional financial and personnel resources should be allocated to processing centers to speed up processing times.

About 94% of SAHs surveyed expressed overall concern on long processing times for non-Syrian cases. The government acknowledged that Syrian applications were prioritized at the expense of other applications thus creating backlogs.

2017 Recommendation 2: The processing of backlogged applications from global visa posts should be the government's priority for the next three years.

Advocacy

In *A Half Welcome*, SAHs requested that IRCC increase financial and human resources to respond more effectively to the applications at all stages, until refugees are resettled in Canada.

Another issue related to wait times and backlogs is the complexity of the application process. Refugee sponsorship requires numerous complex and lengthy forms to be filled online by both the refugees and their sponsors in one of Canada's official languages. Most refugees find it hard to access computers and to communicate in English or French. Any errors made result in applications being returned, forcing applicants to start the whole process over.

Given the differential processing times by region, the fact that almost 50% of refugee populations are women, and the reality that gender considerations are critical in people's experiences of forced displacement, it is vital to utilize an intersectional gender-based analysis (GBA+)[iii] in refugee policy-making. In 2019, CPJ released *The Most Vulnerable*, a report on intersectional analysis in policy-making. On differences in wait times between

Syrian and non-Syrian applicants, it said "conducting an intersectional analysis of [*A Half Welcome*] illustrates that these findings suggest clear issues of inequity."[6]

Focusing on these recommendations, in January 2020 CPJ and its ecumenical partners wrote a letter to the new Immigration, Refugees and Citizenship Canada (IRCC) Minister Marco Mendicino calling on him to address wait times, backlogs, and other concerns that hinder a full welcome of refugees. [iv]

Progress

It is worth noting that prior to the introduction of an intake management system in 2012, the number of refugee sponsorship applications submitted far exceeded the available admission spaces resulting in the increase of the backlog. As a result, the SAH Association has cooperated with the government policy of caps and allocations regarding the number of refugees that SAHs can sponsor through the PSRP. The intake management system has, therefore, led to the gradual reduction of backlogs across visa offices abroad.

Government efforts to modernize the resettlement operations sector:

2016 – The Resettlement Operations Division (ROD) was created to oversee and coordinate refugee resettlement activities, including the in-Canada sponsorship intake process, intake of referrals abroad, destining, arrivals, and coordination of integration activities.

2017 - The functions of CPO-W, CPO-V and the Matching Centre in Ottawa were merged into ROC-O to bring more flexibility and efficiency to how the work is performed.[7]

iii GBA+ is an intersectional analytical process used to examine how various intersecting identity factors may impact the effectiveness of government initiatives. It involves examining disaggregated data and research, and considering social, economic and cultural conditions and norms. https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/annual-report-parliament-immigration-2019.html#s6

iv https://cpj.ca/letter-to-minister-mendicino-improve-refugee-integration/ (see Appendix)

In 2017, the Standing Committee on Citizenship and Immigration (CIMM) recommended that IRCC should find a way to notify applicants of small errors and omissions prior to returning the entire application package.[8] IRCC is yet to follow up on this recommendation.

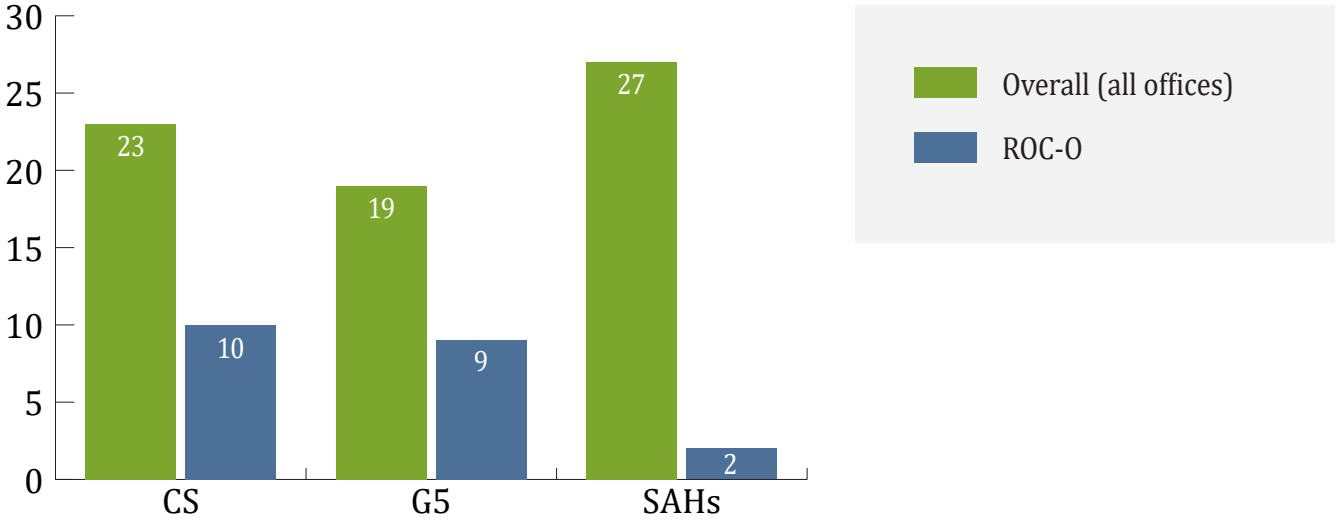
Statistics of processing times are not readily available, but in 2018 *The Catholic Register* reported that average processing times for privately sponsored refugees could vary wildly with church-sponsored Iraqi refugees arriving in Canada after 15 months while refugees from Ethiopia and South Africa endured average wait times of 69 months.[9] CIMM also recommended that IRCC publish current average wait times online for each immigration processing stream by region. IRCC has not yet published current average wait times by stream and region, saying that each application is different and takes a different amount of time to process. However, they do have an online tool through which processing times for individual cases can be estimated.[10] It is difficult to track trends in processing times, however, if these statistics are not made available.

Fortunately, since 2017, there has been a marked improvement in the processing of applications and clearing application backlogs. Progress has been made regarding the long processing times for non-Syrian cases resulting from recommendations in *A Half Welcome* and combined advocacy efforts with other refugee rights stakeholders. In their 2019–2020 Departmental Plan,[11] IRCC reported that they have introduced a new method to provide applicants with more accurate projections for processing times of permanent resident applicants. They promise to continue to improve client service by further integrating and modernizing their operations to process immigration applications more efficiently. IRCC also prepared for the anticipated increases in application volumes by undertaking various information technology and human resources measures to mitigate against possible delays associated with these higher volumes. IRCC should be commended for taking these measures and we hope they maintain this progress.

In their 2019 annual report, IRCC states that they will continue to use GBA+ as a tool to work toward an even stronger analysis of intersectional data to increase their understanding of refugees' and stakeholders' views and to improve policies and programs.[12]

In September 2019, at the CCR-IRCC Roundtable, IRCC reported that processing times are decreasing as they continue to aim for processing times of 12 months, and that there have been initiatives to address backlogs in Asia and Africa.[13] It provided the following statistics about processing times:

Processing Times (Months) - As of July 31, 2019



Notes:

Processing time should read as *80% of cases finalized in the last 12 months were completed within X months or less.*

Overall - includes applications processed at all offices. The time spent in processing is calculated from the application received date to the final decision date.

ROC-O - includes sponsorship processing only at ROC-O. The time spent in processing is calculated from the application received date to the sponsorship decision date.

As can be seen above, the processing times at the Resettlement Operations Centre in Ottawa (ROC-O) for Groups of Five (G5) and Community Sponsor (CS) applications is much slower than it is for SAHs. If delays in processing continue at ROC-O, especially for G5s which make up about half the caseload, then it will be hard to achieve the 12 months processing time frame. IRCC is cognizant of the huge surge and the time it takes to process them. For SAHs, IRCC has a service standard for processing at ROC-O, but for G5s, processing times will be longer due to the growth in applications.

In *Finding Refuge in Canada: A Syrian Resettlement Story*, IRCC disclosed that it was working towards reducing the processing times for the PSRP to an average of 12 months by 2019.[14] Good progress has been made and the government has reduced processing times significantly, though it has not reached the 12-month goal of processing applications. The processing times have come down because the levels plan targets have dramatically increased over the past several years. Since 2016 the PSRP landing targets have at least tripled. That is a key reason the backlogs have come down. Meanwhile, a backlog of applications still exists.

Effects of COVID-19

The COVID-19 pandemic has disrupted the refugee resettlement sector. It has triggered strict global border controls and international travel to Canada significantly. The IRCC workforce has been reduced to a skeleton staff. The UN Refugee Agency and International Organization for Migration suspended resettlement travel for vulnerable refugees caught in limbo at crowded camps. Meanwhile, sponsorship applications are going in but there is hardly any processing going on. This means the government must prepare for and address the backlog that will ensue. The government is being proactive by planning for a total overhaul of how it processes immigration applications. In a tender request, IRCC sought to adapt aging computer systems, paper applications, and in-person interviews in the "new normal" post-pandemic. They plan to quickly develop updated strategies and processes, including digital systems to cope with the changing times. They are cognizant of the upcoming surge of applications and support requirements that will put tremendous demand on global operations.[15]

2020 Recommendation 1: The government should increase their efforts to reduce the backlog of PSRP applications and make the achievement of a 12-month processing time frame a top priority.

ALLOCATION LIMITS

Overall, about 87% of SAHs expressed concern over the limited number of spots available for sponsorship applications in 2017. Of these, 59% were very concerned that current allocation numbers limit their sponsorship capacity.

2017 Recommendation 3: The government must provide SAHs with a three-year levels plan that provides estimates on the number of refugees from all sponsorship categories to be resettled within this period.

Advocacy

Between 1982 and 1984, Canada had begun providing multi-year levels immigration plans, but a recession made the endeavour short-lived. Another attempt to provide the plans was made between 2010 and 2014 but it, too, soon fizzled out. Since then, SAHS and other stakeholders have been advocating for the reinstatement of a multi-year approach because it allows for more predictable sponsorship planning over a three-year period. Previous immigration plans typically set out targets for only 12-month periods.

Progress

Stakeholders applauded when, in 2017, Canada reintroduced multi-year levels immigration plans. IRCC announced its 2018-2020 multi-year immigration levels plan beginning with 310,000 new permanent residents in 2018 and growing to 330,000 in 2019 and 340,000 in 2020. Although the target was 330,000 permanent residents, Canada admitted 313,580 immigrants in 2018-2019, but it was still one of the highest levels in Canadian history.[16]

In 2018, the 2019-2021 Immigration Levels Plan replaced the 2018-2020 version with a number of adjustments to previously announced targets in 2019 and 2020.[17] In the 2019–2021 plan, Canada would admit as many as 147,850 refugees and protected persons as well as up to 13,750 persons for humanitarian and other reasons from 2019 to 2021.[18]

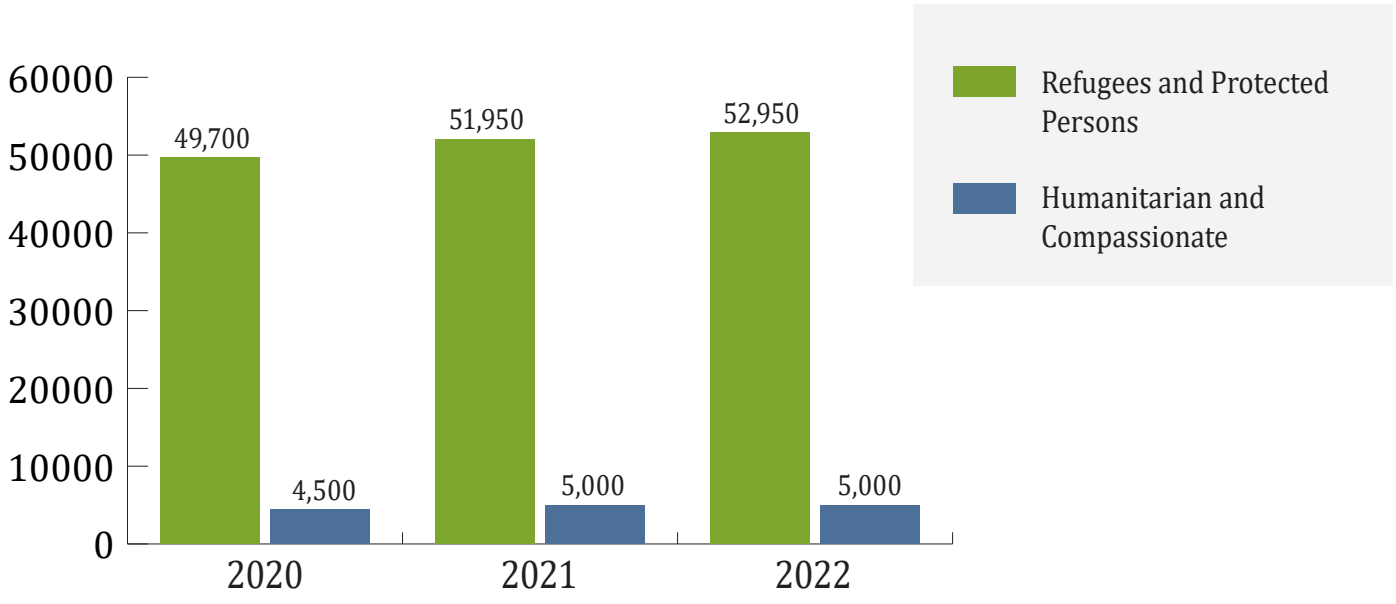
On March 12, 2020, IRCC released details of the Immigration Levels Plan for 2020-2022 in which Canada will settle up to 154,600 refugees, as well as up to 14,500 persons for humanitarian and other reasons. Releasing the multi-year levels plans is clearly a manifestation of steady progress. It is noteworthy that these are the highest immigration targets in Canadian history.[19] The chart below depicts the 2020-2022 levels plan for refugees and humanitarian cases.

Effects of COVID-19

Due to the current global pandemic, chances are that the annual immigration intake might not be achieved for 2020. Arrivals in the first quarter of the year have declined rapidly in the number of permanent residents, migrant workers, and international students.[20]

2020 Recommendation 2: In collaboration with SAHs, government should simplify and streamline the process of sponsoring refugees under the PSRP and to reduce the bureaucratic processes that hinder private sponsors from working effectively.

2020-2022 Immigration Levels Plan (Refugees & Humanitarian)



TRAVEL LOANS

A Half Welcome pointed out that travel loans were "an unfair burden on people who usually come with nothing" and that "repaying [these loans] significantly impacts refugees' ability to become financially self-sufficient." The government covered the travel costs for Syrians who arrived between November 2015 and February 2016, exempting these refugees from transportation loans. Though this inequitable policy was not repeated, there are still questions about the overall fairness of burdening newcomers with loans.

In 2017, about 75% of SAHs were "generally concerned" about government's decision to waive travel loan repayment requirements for Syrian refugees only. 53% of them were "very" concerned about the policy, which they considered inequitable.

2017 Recommendation 4: The loan repayment program is still inequitably implemented. Thus, the government must totally waive the loan repayment requirement for all refugees, to ensure that the program treats all refugees fairly.

Advocacy

In 2018, CPJ and other ecumenical partners presented a joint petition to the House of Commons calling on the government to eliminate travel loan repayment for all refugees.[21] The call to action stemmed from *A Half Welcome* and SAHs' concerns about how the repayment of travel loans poses a significant financial burden to newcomers. In response to the petition, the federal government concluded that they needed to make changes to the Immigration Loan Program, but not to eliminate it or absorb the costs of travel loans. Early in 2019, CPJ launched our *#WaiveRepayment* campaign, calling people to take action in support of waiving loan repayments for all refugees.[22]

Progress

Though repayment of travel loans has not been waived, on February 21, 2018, the federal government made loan repayment easier through the changes outlined in the table below:

Pre-2018	2018
Repayment started 30 days after arrival	Repayment begins one year after arrival
Interest must be paid	New loans are interest-free and no further interest accrues on existing loans
Repayment required within one to six years (depending on amount)	Repayment period extended by two years reducing the amount of monthly instalments

Additionally, because of concerted lobbying and advocacy efforts by CPJ and other stakeholders, another minor victory was achieved. IRCC agreed to settle the repayment of travel loans for exceptionally higher-needs GARs and JAS cases through the Resettlement Assistance Program (RAP).[v]

2020 Recommendation 3: The government must waive loan repayment requirements completely for all refugees.

v RAP is a contribution program aimed at newcomer income support and assistance for a range of immediate essential services. https://www.canada.ca/en/immigration-refugees-citizenship/corporate/publications-manuals/operational-bulletins-manuals/service-delivery/resettlement-assistance-program.html

ADDITIONALITY IN PRIVATE SPONSORSHIP

Refugee resettlement is primarily the government's responsibility. Any sponsorships done through private sponsorship should be additional to the government's commitment to resettle refugees. In other words, government should not "off-load" their resettlement responsibilities onto private sponsors. The principle of additionality is supposed to ensure that private efforts expand refugee protection spaces by complementing government commitments to resettlement, rather than replacing it. Over time, the numbers for refugee resettlement have increased overall, but there has not been a commensurate increase in governmental responsibility.

Between 1994 and 2014, Canada resettled twice as many GARs as privately sponsored refugees, but for the years 2015 to 2019, that ratio switched. In 2019, Canada resettled 29,950 refugees through various programs, with 19,000 (or 63.4%) being privately sponsored. These numbers suggest a troubling shift away from the time-honoured principle of additionality to a focus on private sponsorship as the main means for settlement by sponsorship.[23]

Advocacy

Some SAHs were concerned that resettlement efforts may be in violation of the principle of additionality, citing IRCC 's levels plan for 2017 as an indication—16,000 PSRs were resettled compared to only 7,500 GARs that year. In a late 2017 press release, CPJ and CCR recommended a specific target of 20,000 GARs in 2018.[24]

Progress

To date, there has been minimal progress in increasing GAR numbers to the recommended target. The 2018-2020 plan targeted 7,500 GARs for 2018 and 8,500 for 2019. The government also committed to resettle an additional 1,000 vulnerable Yazidi women and girls to add to the 200 planned for 2018.[25]

In the 2019-2021 plan, there was a nominal increase in the GARs target for 2019 to 9,300. As the table below shows, in 2020 the number climbs to 10,700 GARs. In the next three years 60,000 PSRs will be resettled. This is almost twice the 33,100 GARs to be resettled in the same period.

Refugees and Protected Persons (from 2020-2022 Immigration Levels Plan)	2020	2021	2022	Total
Protected Persons in Canada & Dependents Abroad	18,000	20,000	20,500	**58,500**
Resettled Refugees - GARs	10,700	10,950	11,450	**33,100**
Resettled Refugees - PSRP	20,000	20,000	20,000	**60,000**
Resettled Refugees - BVOR	1,000	1,000	1,000	**3,000**
Total Refugees and Protected Persons	**49,700**	**51,950**	**52,950**	**154,600**
Total Humanitarian, Compassionate and Other	4,500	5,000	5,000	**14,500**

2020 Recommendation 4: In keeping with the principle of additionality, the government should increase the number of GARs to 20,000 per year.

SAH-GOVERNMENT COMMUNICATION

Another issue that came up in *A Half Welcome* is the communication challenges between SAHs and IRCC. This leads to a lack of information on critical matters. In CPJ's 2014 study, *Private Sponsorship and Public Policy*, many SAHs were concerned about the government not consulting them on some of the private sponsorship policies that were implemented. Similarly, following *A Half Welcome*, many SAHs expressed concerns over the lack of government consultation on timelines, allocation limits, and the travel loan policy. However, a significant number of them believed the government's overall responsiveness to SAHs' concerns has been improving.

Progress

The SAH Council and IRCC connect through the NGO Government Committee. This is an ongoing structure to facilitate communication around policy issues. However, it does not appear to be a reliable arrangement because it is ad hoc in nature.

2020 Recommendation 5: IRCC should improve communication with SAHs and other sponsors to effectively develop, implement, and evaluate policies.

NEW POLICY RECOMMENDATIONS

The following section discusses issues related to those that were raised in *A Half Welcome*. The issue of delays in processing family reunification is a historical one while PSRP Assurance is a new emerging issue.

FAMILY REUNIFICATION PROCESSING DELAYS

The issue of family reunification is closely related to the PSRP and SAH concerns. Private sponsorships have been mobilized to reunite family members who may have been separated as a result of persecution in their home country.

As soon as most resettled refugees arrive in Canada, their most immediate request is the sponsorship of family members left behind in precarious situations. Although family reunification is one of the key pillars of Canada's immigration policy, most newcomers seeking to reunite with immediate family members overseas face very long processing delays. Canada's immigration system treats families unequally. The reunification process is slower for refugees than for other immigrants, and slower for people from Africa than from the rest of the world. By law, some families are denied the right to family reunification under the excluded family member rule.[vi]

Reuniting families contributes positively to the settlement outcomes of resettled refugees already in Canada, as well as to the settlement outcomes of their sponsored relatives. When a refugee in Canada continues to worry about family left overseas, their settlement and integration into society suffers. Their time and emotional energy is devoted to family overseas as well as sending them financial resources that they themselves would have devoted to housing, school, or food.

Advocacy

As the CCR observes, reuniting families is very important because of the devastating ways in which family separation impacts mental health and impedes the ability of newcomers to integrate into Canadian society. It also leads to lost economic opportunities—both for the affected families and for Canada as a whole. Reuniting families was one of the CCR advocacy priorities in 2019. The letter to IRCC Minister Mendicini (see Appendix) from CPJ and ecumenical partners pointed out that family reunification processing times differ by region and remain much slower in Africa than other regions. We urged him to speed up and introduce standard short processing times for family reunification in all regions.

Progress

As a result of civil society advocacy efforts, in 2017 the House of Commons Standing Committee on Citizenship and Immigration (CIMM) recommended that IRCC establish service standards of 12 months for applications under the One-Year Window family reunification program for resettled refugees and for processing applications for dependents abroad of protected persons."[26]

In their 2018 Annual Report to Parliament on family reunification, IRCC showed that it had:[27]

- increased immigration levels under the family class to allow for more families to reunite;
- met two important mandate commitments in support of family reunification by increasing the age of dependent children and repealing conditional permanent residence; and
- significantly improved the spousal sponsorship process, making it faster and easier for couples to reunite.

On September 9, 2019, the government opened a two-year pilot project that allows some people to sponsor excluded family members, that is, those who were not originally declared to immigration authorities.

These advances in speeding up family reunification are positive and should be maintained. IRCC has been able to reduce backlogs significantly and make family reunification a priority, thanks to a historic multi-year immigration levels plan.

2020 Recommendation 6: Government should establish service standards of 12 months for processing applications under family reunification.

vi Excluded family members are those who were not declared to a visa officer when the person sponsoring them immigrated to Canada. See Family reunification https://ccrweb.ca/en/family-reunification

ASSURANCE AND MONITORING

A current issue of concern to many SAHs that arose after the release of *A Half Welcome* is IRCC's approach to PSRP monitoring, which serves as a form of quality assurance for the program. As per SAH agreements, both IRCC and SAHs are responsible for monitoring the quality of financial and settlement support being provided to the newcomers to ensure that both the sponsor and the newcomers are meeting their respective commitments and responsibilities. However, in January 2019, IRCC introduced proactive monitoring of refugees to get a picture of how well the PSRP program is working in all streams—SAH, G5, CS, and BVOR.[28] It started conducting random outreach to refugees to assess the level of support they are receiving. They use either online questionnaires or telephone interviews. Following the outreach, sponsors may be contacted, but only if potential issues are identified. This responsibility is in the hands of the Resettlement Services Assurance Team (RSAT).

RSAT monitors sponsorships to ensure that newcomers receive adequate support, financial and otherwise, from sponsors for successful integration and the best possible resettlement outcomes. In addition, it is also used to identify possible violations of the Immigration and Refugee Protection Act or the Criminal Code when issues like misrepresentation and fraud arise.[29] SAHs agreed that monitoring is very necessary although they have reservations about how it is done by IRCC.

Advocacy

SAHs have, until recently, been engaging IRCC through the Assurance Working Group (AWG) to address operational issues including communication, facilitating the training of sponsors, and policy-related issues. During the 2019 AWG meeting, SAHs stated that they believe monitoring was introduced without adequate consultation. Their challenges with assurance work include an increased workload despite limited staff; an inability to prove in-kind support; the bureaucratic application of the guidelines that does not prioritize the best interests of the newcomers; and a climate of accusations and/or threats from the assurance officers.

The SAHs recommended that IRCC set up a dispute resolution mechanism; respect the privacy of newcomers; create a concern matrix;and an outline of possible solutions; recognize the broad range of support including in-kind support; and recognize that PSRP is a partnership between government and civil society.

Progress

After attending the 2019 AWG meeting, IRCC communicated that they recognized the need for a better flow of information between IRCC and the SAH community on a variety of issues but most pressingly on the assurance work. They stated that they will work with the SAH Council and Refugee Sponsorship Training Program (RSTP)[vii] to develop a communications strategy that will ensure SAHs have the information they need to do their work.[30] They stressed the importance of ensuring that refugees are accessing and receiving the supports they need to successfully integrate into their communities.[31]

AWG was set up for a specific purpose to be accomplished in a specific time frame. It continued to meet until it was disbanded by IRCC in March 2020. According to them, AWG was formed to address specific operational issues like the wording and tone of letters from RSAT to SAHs and the wording and contents of the financial FAQ document. On the other hand, they thought that the questions raised by the SAHs were more related to policy issues to do with a monitoring framework for PSRP cases. Unfortunately, assurance policy issues are now to be addressed on an ad hoc basis through the work of the NGO-Government Committee.

2020 Recommendation 7: IRCC needs to study the private sponsorship ecosystem in order to structure a more appropriate assurance monitoring system.

vii RSTP (funded by IRCC) is a program designed to support SAHs of Canada, their Constituent Groups, Groups of Five, and Community Sponsors on a national level with the objective of addressing their training needs and information needs of sponsored refugees.

CONCLUSION

Our 2020 analysis of government efforts to address challenges identified in *A Half Welcome* indicates that while some important improvements were made to the refugee resettlement process, significant gaps remain. As partners in the resettlement of refugees, SAHs, the government, and private sponsors all want good settlement outcomes for newcomers. The success of the PSRP program depends on full cooperation between the government and the sponsorship community. SAHs collectively hold Canada's expertise in the private sponsorship of refugees. There should be regular consultations to ensure SAHs' experiences and recommendations are taken into consideration. Constant communication between the stakeholders is key to any success.

RECOMMENDATIONS

CPJ makes the following recommendations to the federal goverment to improve Canada's private sponsorship of refugees program:

1. The government should increase their efforts to reduce the backlog of PSRP applications and make the achievement of a 12-month processing time frame a top priority.

2. In collaboration with SAHs, government should simplify and streamline the process of sponsoring refugees under the PSRP and to reduce the bureaucratic processes that hinder private sponsors from working effectively.

3. The government must waive loan repayment requirements completely for all refugees.

4. In keeping with the principle of additionality, the government should increase the number of GARs to 20,000 per year.

5. IRCC should improve communication with SAHs and other sponsors to effectively develop, implement, and evaluate policies.

6. Government should establish service standards of 12 months for processing applications under the family reunification.

7. IRCC needs to study the private sponsorship ecosystem in order to structure a more appropriate assurance monitoring system.

APPENDIX

LETTER TO MINISTER MENDICINO: IMPROVE REFUGEE INTEGRATION

In early January 2020, CPJ and the Christian Reformed Centre for Public Dialogue sent a letter to the new IRCC Minister Marco Mendicino welcoming him into his new job and applauded the positive changes that the federal government has made for refugee rights since 2015. They called on the minister to address several lingering concerns that would help refugees to fully integrate into Canadian society for the good of all.

The Honourable Marco E. L. Mendicino P.C., M.P.
Minister of Immigration, Refugees and Citizenship
365 Laurier Avenue West
Ottawa, Ontario K1A 1L1

Dear Minister Mendicino,

On behalf of Citizens for Public Justice (CPJ) and the Christian Reformed Centre for Public Dialogue we congratulate you on your appointment to cabinet and at the same time wish you a happy new year. We wish you the blessings of wisdom and discernment as you embark on your new responsibilities as Minister of Immigration, Refugees and Citizenship (IRCC), and we look forward to ongoing discussion with you.

We have been working together as a coalition to animate *A Half Welcome*, a report that CPJ released in 2017 pertaining to the concerns of Sponsorship Agreement Holders (SAHs) regarding the Private Sponsorship of Refugees (PSRP) Program. Their concerns included the long processing times, allocation limits and inequities in travel loan repayment (2015-16). It is commendable that government agreed to extend the loan repayment period, removed interest for future loans and further accumulation of interest on outstanding loans. The government should fully waive travel loan repayment for all refugees to enable them to settle in Canada unencumbered.

Cutting processing times and backlogs: We are pleased that *A Half Welcome* recommendations are echoed in your mandate – to reduce processing times, improve IRCC's service delivery and client services by making applications timelier and less complicated, and enhancing system efficiency, including in the asylum system. In the last Parliament your government made a commitment to reduce processing times to 12 months by 2019 and to cut down on processing backlogs. While processing times have improved, they are not at 12 months and a backlog still exists. We urge you to continue reducing the backlog of PSRP applications and aiming for the 12-month processing time frame as a priority.

Family reunification We are encouraged that last year your government announced a two-year pilot project on excluded family members. We hope the program becomes permanent because family reunification is one of the objectives of Canada's immigration policy that is key to the full integration of newcomers. However, processing times differ by region and remain much slower in Africa than other regions. We urge you to speed up and introduce standard short processing times for family reunification in all regions.

Principle of additionality: The private sponsorship system was conceived 40 years ago to engage communities in the welcome of refugees as an addition to government measures for resettlement. Community engagement in private sponsorship helped to build social license for the essential work of government sponsorship of especially vulnerable classes of Refugees. Between 1994 and 2014, Canada resettled twice as many GARs as PSRPs but that ratio shifted between 2015 and 2019. For instance, in 2019, Canada resettled 29,950 refugees from abroad through various programs, with 19,000 (or 63.4%) privately sponsored. These numbers suggest a troubling shift away from the time-honored principle of additionality to a focus on private sponsorship as the lead means for settlement by sponsorship. Therefore, with the best practice of additionality in mind, we urge you to increase the number of government-assisted refugees to 20,000 per year as part of the ongoing revision and implementation of the annual Immigration Levels Plan.

PSRP Quality Assurance and Monitoring: While we support the monitoring of private sponsorships by IRCC, it has been a challenge to many SAHs. It is sometimes a challenge for groups that have a family connection or are part of the ethnic or religious community of the newcomers to demonstrate that they

are living up to their commitments because they do not always record or monetize their support. SAHs have limited capacity in terms of staff to respond within restrictive timelines. We urge you to continue ensuring that refugee sponsorship programs have integrity and protect newcomers from abuse and neglect. At the same time, we call on you to allow for flexible approaches to quality assurance in collaboration with SAHs. Based on such collaboration IRCC can establish reasonable, practical and effective minimum expectations and outline how they can be implemented in ways that protect newcomers and empower sponsors.

Root causes of forced displacement: The Global Compact on Refugees recognized the fact that eliminating the root causes of forced displacement is the most effective way to achieve solutions through resolving protracted refugee situations and preventing new crises from emerging. While this is beyond your mandate, we urge you together with your colleagues in cabinet to pay attention to these root causes with the aim of finding solutions.

Tackling Barriers to a Full Welcome: Canada is a world leader in refugee intake and a beacon of multiculturalism. But when refugees get to Canada, they come face to face with its border wall – barriers to full integration due to social exclusion. We also urge you to ensure the delivery of high-quality settlement services for the successful settlement and integration of newcomers. We are also in full support of eliminating citizenship fees.

In conclusion Minister Mendicino, we encourage you to continue dialogue with civil society partners in order to build a welcoming refugee system for the common good of Canada and in compliance with our international obligations. We are eager to discuss the matters raised in this letter with you and are committed to constructive and meaningful support for you in your critical role. May we be in touch with your office to arrange a conversation in the near future?

Sincerely,

Willard Metzger, Executive Director, Citizens for Public Justice
Rev. Darren Roorda, Canadian Ministries Director, Christian Reformed Church
Stephen Kaduuli, Refugee Rights Policy Analyst, Citizens for Public Justice
Mike Hogeterp, Director, Christian Reformed Centre for Public Dialogue

cc.

Hon. Peter Kent P.C., M.P.
Jenny Kwan M.P.

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CITIZENS FOR PUBLIC JUSTICE

Citizens for Public Justice (CPJ) is a national, progressive organization of members who are inspired by faith to act for social and environmental justice in Canadian public policy. Our work focuses on three key policy areas: poverty in Canada, climate justice, and refugee rights. For more than 50 years, justice-oriented people of faith, along with churches and religious orders, have joined their voices as Citizens for Public Justice. Together, we're working towards a better Canada.

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