



## **Canadian Council for Refugees and the elected Sponsorship Agreement Holder representatives**

### **Comments on Private Sponsorship of Refugees evaluation**

**September 2007**

#### **A) Introduction**

In May 2007, Citizenship and Immigration Canada published the “Summative Evaluation of the Private Sponsorship of Refugees Program.” Concerns about serious flaws in the report have prompted the Canadian Council for Refugees and the elected Sponsorship Agreement Holder representatives (SAH representatives) to the NGO-Government Committee to prepare these detailed comments. The summative evaluation does not in our view provide an effective analysis of the program’s relevance, success or cost-effectiveness. We have serious concerns about the evaluation’s methodology, factual errors, absence of adequate data and data analysis. Some of the evaluation’s conclusions are not properly supported by the evidence. Furthermore, the evaluation fails to address a number of significant and relevant questions. As a result, the evaluation gives an inaccurate, incomplete and misleading picture of the Private Sponsorship of Refugees (PSR) Program.

The potential implications of the shortcomings in the evaluation are the greater because this report represents one of very few government documents about the program. The Private Sponsorship of Refugees Program has rarely been studied or evaluated. There is therefore an increased risk that, despite its flaws, the evaluation report will be referred to, within and outside of government, for information about the program. Readers should be cautioned that the evaluation cannot be relied on without significant corrections and qualifiers.

#### **B) Concerns about Methodology, Data Analysis, and Errors**

The “Summative Report” does not meet the minimum standards for a quantitative report. While there are references to tables and data in the Appendices, these have not been included. The report has no detailed methodological section providing samples of the data-gathering tools, nor are cumulative data attached to provide rationale for the conclusions drawn. Although the report makes reference to “Appendix A for the logic model and Appendix B for the evaluation matrix”, these appendices are not included.

The evaluation relies heavily on telephone surveys and an online SAH survey. The design of the interviews, surveys and focus groups was ill-suited to capturing full information about the impact of the program or gathering feedback from participants on their experiences.<sup>1</sup> Furthermore, the data collection conducted by Government Consulting Services was poorly designed and lacked adequate user testing. Delays in the implementation of surveys resulted in much of the data collection being conducted during the summer months when most sponsoring groups are not active.

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<sup>1</sup> The SAH representatives raised concerns with Citizenship and Immigration Canada (CIC) about the Evaluation Matrix and Methodology while the evaluation was underway. They submitted oral and written comments about the proposed overall design and methodology of the evaluation.

Throughout the period when the telephone survey interviews were conducted, respondents voiced complaints about the process. Specific concerns included the following:

- Incomplete and out-of-date lists led to overlap in calls to respondents who were left confused as to what sponsorship or which sponsorship role they were being asked about.
- Interviewers did not have sufficient understanding of the functioning of the Private Sponsorship Program or the roles and responsibilities of various players to enable them to answer the respondents' need for clarification. For example:
  - Respondents were encouraged to base their responses on their "most recent case" even if this was a Joint Assistance Sponsorship (JAS) case and not a Private Sponsorship case. Because the survey had no way to record whether the case was a PSR or JAS, the data collected on financial assistance provided to sponsored refugees was distorted.<sup>2</sup>
  - Respondents were asked questions not appropriate to their type of involvement or knowledge (e.g. Constituent Groups (CGs) were asked questions only SAH representatives could answer).
- Respondents were given no opportunity to prepare for the call, with the result that many had to guess at responses requiring detailed statistics and dollar figures.
- The range of possible answers was limited and did not allow the survey to capture the answers respondents felt were correct or appropriate.
- Some of the questions were phrased in an ambiguous manner that led respondents to interpret them in widely varying ways.

As a result of these concerns, many private sponsors involved directly in the process expressed their disappointment that they were unable to convey to the interviewers some of the key input that they wished to provide.

The information collected through the telephone survey was supplemented by written data provided by SAHs through an online survey. This was an inflexible data-gathering tool that presented accessibility challenges for some representatives with limited computer or English/French language skills. In addition, the survey had many of the same design flaws mentioned above, including the ambiguous nature of questions due to imprecise phrasing, the inflexibility of the "check-list" options, and the demand for internal information about an organization's operations without explanation of how this information would be used. SAH representatives reported frustration that this survey did not allow them to accurately explain their role in the Private Sponsorship of Refugees Program, to express their opinions of the value of, or the frustrations with, the program, their organization's motivation or their conditions for staying involved.

Most seriously, we feel that there is no validity to conclusions drawn from analyzing the very limited responses to the financial questions in the SAH survey, which unfortunately seem to be the main source of data for some of the cost-effectiveness questions.

Detailed comments relating to methodology, data analysis and specific errors in the text are provided below in section E, page 7.

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<sup>2</sup> As noted below, there are in addition other factors that mean that the figures provided for financial assistance to privately sponsored refugees are unreliable.

## C) Major concerns

The following are the major concerns with the text of the evaluation, organized by the four key themes.

### 1. Program Relevance

The Evaluation, at page 14, correctly ties the PSR program to the following *Immigration and Refugee Protection Act* (IRPA) objectives:

- 3(2)(a) “to recognize that the refugee program is in the first instance about saving lives and offering protection to the displaced and persecuted”, and
- 3(2)(b) “to fulfil Canada’s international legal obligations with respect to refugees and affirm Canada’s commitment to international efforts to provide assistance to those in need of resettlement”

However, it would also be worth noting the relevance of the PSR program to the following IRPA objective:

- 3(2)(f) “to support the self-sufficiency and the social and economic well-being of refugees by facilitating reunification with their family members in Canada”

Disappointingly, having established the relevance of at least some of the IRPA objectives, the evaluation fails to consider the program’s successes and challenges in the light of these objectives.

Notably, the evaluation implicitly supports restricting the numbers of applications sponsors submit, even though this runs directly counter to the relevant IRPA objectives. The sole reference to this point is at p. 15 where it is noted that some interviewees “were of the opinion that more could be done” to respond to the need of refugees for resettlement. **Yet, the evaluation never asks how the program could do more.**

Similarly, the problem of **long delays in processing**, a topic that features prominently in the evaluation, is never analyzed from the point of view of the impact the delays have on the objective of “saving lives and offering protection”.

Regarding reference to the international context, as defined in the UNHCR Agenda for Protection, reference is made to Goal 3 (sharing of burdens and responsibilities more equitably) and Goal 1 with respect specifically to complementary forms of protection. Curiously, however, the evaluation fails to mention Goal 5: Redoubling the search for durable solutions. This goal includes a point (number 5) calling for an expansion of resettlement opportunities, which is highly relevant for the Private Sponsorship of Refugees Program.

With respect to the Agenda for Protection’s Goal 3, the evaluation highlights the objective of “strengthened partnerships for protection with civil society, including NGOs.” It is disappointing to note that little is offered by way of evaluation of how successfully the partnership inherent in PSR is being strengthened.

## 2. Program integrity

This section contains significant emphasis on the numbers of applications submitted and refusal rates.

As mentioned above, it is implied that a large number of applications is a bad thing, even though the more applications there are, the more refugees may be protected, which is the goal of the program. A higher number of sponsorship applications also demonstrates the increased interest and commitment of Canadians to assist refugees through the PSR Program, which again supports the domestic and international objectives to provide resettlement to more refugees, deepen partnerships with NGOs and engage civil society in refugee protection.

Similarly the statement that some sponsors submit disproportionately large numbers of applications implies a negative value judgment that is inappropriate in an objective evaluation.

There is a complete absence of analysis of the international context that might be driving the **high numbers** (i.e. the large numbers of refugees without a durable solution, including many refugees with family members in Canada). The evaluation fails to consider how the international context affects Canadians, who very often know people – or at least know of people – who have been forced to flee persecution. Despite the reference to the role of UNHCR and the Agenda for Protection, the evaluation fails to draw the relevant implications for the analysis of the program. The current crisis facing Iraqi refugees offers an excellent illustration of the realities: the growing number of displaced Iraqis has led to an increase in numbers of sponsorship applications submitted. This needs to be considered as an opportunity to better meet the objective of the program, i.e. to protect refugees, not as a challenge to the program's integrity.

Regarding **refusals**, the evaluation suggests a relationship between refusal rates and screening by sponsors, but this implies that refusals necessarily represent cases that are correctly rejected, an assumption strenuously and repeatedly disputed by NGOs and never analyzed in the evaluation. Again the case of Iraqi refugees is illustrative – there has been a high refusal rate of Iraqi privately sponsored refugees. This is changing now, as the international interpretation of the needs of the refugees has developed. In at least one case, a family initially refused by the visa post was recently recognized as refugees and resettled to Canada. Were the private sponsors submitting the “wrong” cases, or was the visa office slow in recognizing the realities that Iraqi refugees are fleeing?

The evaluation does not address the possibility that a significant proportion of refusals might be for reasons that the sponsor could not know or anticipate when the application was submitted, such as a change in country conditions, the international political and protection context, a change in conditions for the applicants as a result of long delays, and many other possible factors that ultimately are recorded as refusals. It is misleading to assume that a refusal indicates that the applicant was ineligible at the time of application and that the sponsor therefore should not have made the application.

## 3. Resettlement success

It is widely recognized, including by the Government of Canada, that integration is a two-way street. This means that we need to consider the impact on Canadian society of the PSR program, in terms of the host society's attitudes toward refugees and its capacity to adapt to newcomers. The evaluation completely fails to examine this question, even though the PSR Program is

arguably one of the most important government programs that engages Canadians in responding to newcomers, especially in smaller centres. Involvement in private sponsorship helps Canadians to learn about the realities faced by refugees and leads to changes in attitudes towards newcomers in society. Along with the Host Program, the PSR Program is Citizenship and Immigration Canada's leading mechanism for providing the kind of direct contact between newcomers and members of the host society that is essential for promoting widespread acceptance that newcomers constitute an asset to society.

Another gap in the analysis relates to settlement services. The evaluation makes no attempt to assess the use of government-funded settlement services provided to privately sponsored refugees and their sponsors nor does it assess the access points and the relevance of such services for privately sponsored refugees. Since linking refugees with the appropriate services is an important element in the role of sponsors, evaluating how and whether this takes place would have been useful in assessing the need for training and settlement service program relevance.

#### **4. Cost-effectiveness**

The discussion of cost-effectiveness is extremely disappointing. The evaluators have chosen to focus on one aspect of the costs without considering the broader picture. In fact the evaluators never clearly state what aspect of the costs it is that they are analyzing: it appears to be pre-arrival costs borne by Citizenship and Immigration Canada (CIC). There is no cost-breakdown for the in-Canada portion of the program and the reader is therefore left in the dark about what makes up the costs (e.g. what proportions of the costs are at the local CIC level, at regional CICs, at headquarters?).

The comparison of the PSR pre-arrival costs with equivalent Government-Assisted refugees (GAR) costs is flawed given that GARs are referred by the UNHCR, to which Canada contributes significant amounts of money, in part to fund the referral services used by Canada. There is no indication that these costs have been included in the calculations for GARs.

More seriously, the evaluation fails to take proper account of the fact that the PSR Program is a volunteer program that generates substantial financial and in-kind contributions towards the resettlement of refugees. The resources CIC spends to support the program leverage these donations. To compare meaningfully the cost-effectiveness of the PSR and GAR programs, the evaluation would need to tell us whether the money spent on supporting the PSR Program could support an equivalent number of GARs, including their income support for the first year.

Even within the narrow perspective offered by the evaluation, there is a lack of any analysis of potential inefficiencies within CIC that may be creating unnecessary costs related to the PSR Program.

### **D) Significant omissions from the evaluation**

The evaluation fails to take into account a number of relevant dimensions.

#### **1. Motivation of sponsors**

The PSR Program is a volunteer response that depends on organizations and individuals choosing to make a commitment to the objectives of the program. As part of their commitment, sponsors make enormous contributions in financial and moral terms, thus increasing Canada's capacity to resettle refugees in need.

The evaluation did not assess the extent to which the program is successful in sustaining and renewing motivation to participate in the program. There is ample evidence that some groups sponsor repeatedly over a period of time and make long-term commitments. How many groups sponsor many times over – and what is their motivation for doing so? What are the factors that determine whether a sponsoring group chooses to sponsor again? For example: Are they related to the ‘echo effect’, the challenging settlement of specific cases, the financial costs of sponsorship, lengthy processing, prolonged commitment and support to those already sponsored etc.? Conversely, what factors lead to groups deciding not to commit to further sponsorships?

For the program to be successful, it is vital that people continue to wish to be involved. For this reason, it would have been helpful if the evaluation had taken into account the question of what motivates sponsors. This is particularly important given the frequent current expressions of frustration among sponsors. If people are not motivated to sponsor refugees, there is no program.

## **2. Identification of refugees in need**

The evaluation does not explore the role played by sponsors in identifying refugees in need of resettlement. For example, sponsors work with partners such as the overseas arms of Canadian NGOs with presence in the field, NGOs’ overseas implementing partners, and formal and informal connections with other NGOs in the field or engaged in refugee protection. Sponsors also work closely with refugee networks who have sources of information about refugees in need that may not be available to the government or UNHCR.

It would have been interesting for the evaluation to have investigated whether in some cases the PSR Program offers a faster response to emerging needs than some of the larger institutional mechanisms. In many instances, it takes some time before the UNHCR recognizes and is able to respond to the resettlement needs of certain group of refugees. While SAHs responded quickly to the crisis of displaced persons from Iraq, beginning to sponsor Iraqi refugees some time ago, the UNHCR was until quite recently considering the displacement of Iraqis as a temporary problem.

Sponsors have accepted their role in assessing the eligibility of the applicants before submitting a sponsorship application insofar as it is possible for them to do so. The evaluation does not review what means and tools are used by SAHs, nor the effectiveness of information and resources made available to them by CIC and other sources. It does not measure the use of Options 1, 2 or 3 nor link their use to outcomes for acceptances and refusals.

## **3. Family reunification**

The evaluation failed to look at the role of the PSR Program in promoting the family reunification of refugees, consistent with IRPA objective 3(2)(f). Failure to address this issue weakens many aspects of the assessment and its conclusions. As the IRPA objective recognizes, it is difficult for refugees to integrate successfully in Canada when they know that family members are in desperate situations of displacement elsewhere.

The dynamics of what has recently been termed ‘the echo effect’ or ‘the second wave’ are essential elements in examining the relevance and the integrity of the PSR Program and the motivations of sponsoring groups. Moreover, the ‘echo effect’ is linked directly to the GAR program as well as those who are resettled through PSR. This aspect should have been explored

with a view to assessing its importance with respect to PSR Program relevance and integrity, refugee protection, IRPA 3(2)(f) family reunification goal, the motivations of sponsors, settlement success and the impact on the broader community.

#### **4. Special needs refugees**

Part of the contribution of the private sponsorship community is to provide support to vulnerable refugees through the Joint Assistance Sponsorship (JAS) program. Through this program, private sponsors supplement the financial assistance provided by the government with additional moral support for refugees determined by the government to have special needs. The evaluation fails to consider this aspect of the PSR Program. Similarly, the evaluation omits consideration of the role of private sponsors in supporting emergency responses, such as the Kosovar evacuation program.

### **E) Specific Comments to Summative Evaluation Text**

The following specific comments relate to concerns about methodology, errors, misinterpretation of data, omissions and conclusions that are not supported by the data. The comments are organized according to the sections of the evaluation report.

#### **2.3 Limitations of the Methodology**

##### **Survey Data (SAHs and CGs/C5s)**

The methodology for reaching conclusions on financial support to refugees was the most seriously flawed. The evaluators acknowledge that there were difficulties in the data-gathering in this area, but argue that using “median data” is sufficient to reduce the risk of errors. We strongly disagree with this assertion and maintain that the evidence gathered is incomplete and insufficient to support the conclusions drawn on this issue.

The phrasing of the SAH survey in the section on the financial support given to refugees provides an example of the ambiguity of questions mentioned above. SAHs were asked to provide “estimates of the costs incurred by your organization in relation to the PSR program, by expense type”. One of the “expense types” was support to refugees over the sponsorship period. The survey made no reference in this question to support given by constituent groups, nor to funds raised specifically for the sponsorship (many do not consider such funds to represent “a cost to the organization”). Some SAHs therefore responded with information only on the direct financial support provided by the main organization, not understanding that the intention was to gather information on funds contributed by constituent groups or raised specifically to support the sponsored refugees. Other SAHs, particularly those that function without constituent groups, provided more comprehensive figures.

The data is further distorted by the fact that in-kind support was not taken into account or quantified. Since a significant amount of support is provided to resettled refugees in-kind, this support must be included for an accurate comparison of GAR and PSR support.

##### **Stakeholder Contact Information**

The SAH surveys asked for details that often required many hours of work to complete (contrary to the covering message); they requested responses on internal organizational policies and salary scales, and they did not allow any flexibility in responding. They were only sent electronically, and required considerable computer proficiency in order to be completed. A printed survey

might have resulted in a much higher return rate, although many SAHs would still have chosen not to respond to the sections of the survey that they found intrusive.

## **3.2 Program Integrity**

### **3.2.1 Refugee Sponsorship**

A large number of SAHs could not provide the total number of their constituent groups, although they could have provided the number of active groups in any one year if this had been asked. The question was too inflexible for denominations with a large number of “possible” groups (i.e. the total number of parishes or congregations). This is an example of how the failure to properly understand the relationship between SAHs and their Constituent Groups led to poor design of data collection tools and therefore misleading data.

With respect to the data on targets, the text identifies only one of the possible reasons for targets not being met. Given that, as the text acknowledges, there are a number of possible factors influencing arrival numbers, it is misleading to focus only on refusal rates.

### **3.2.3 Program Controls, Volumes and Inventories**

#### **Records of Sponsor Population**

The text dealing with the “duplication between lists of CGs, G5s and SAHs” reflects the failure to understand the SAH/CG relationship. *“A CG or G5 may also list a member of a SAH as a contact on the sponsorship application, even if that individual is not involved in the sponsorship. While there is nothing to prevent a member of a SAH from participating in a sponsorship with a CG or G5, the In-Canada Processing Guide states that ‘the person identified (as the contact) must be a party to the sponsorship.’”*

Since a CG is by definition operating under a SAH, the contact person for the SAH is still a “party” to the sponsorship, even if they are not directly involved in the settlement support. The SAH holds ultimate liability. Many SAHs choose to identify their sponsorship coordinator rather than a member of the constituent group as the main contact person for communications with CIC. Although the coordinator may not have a direct role in the provision of settlement support for the arrived refugees, acting as the main contact for CIC communications has helped prevent volunteer frustration and burnout before the refugees even arrive.

#### **Level of Program Monitoring**

Question 2.8 on the SAH survey was poorly phrased, leading to under-reporting on the monitoring of constituent groups. The SAHs were asked only: *“In which of the following is your organization directly involved”* with *“monitoring of refugee cases”* as one of the options. There would have been more informative responses if SAHs had also been asked about their involvement in monitoring CGs’ implementation of the settlement plan.

#### **Volume of Sponsorship Applications**

This section is written from the perspective that “high volumes” of sponsorship are a concern, which is in contradiction with the fact that CIC was explicitly encouraging private sponsorship involvement in the late 90s and early 2000s. Among the measures introduced were greater flexibility to the Group of Five kits, and the creation of the option of sponsoring as a “Community Sponsor”. Community Sponsorships were created as options in 2002, with arrivals



beginning before 2005. The reference to “all sponsors” should therefore include Community groups in this paragraph.

The evaluators note that “for G5s, the intention is that five people would form a group and sponsor a refugee as a one-time event”. There is no evidence provided that this is the “intention” for G5s and the statement “G5s are submitting more applications than intended” is therefore not defensible.

### **Inventories and Processing Times**

There is no comparative data given to support the statement that “a relatively high number of cases have been submitted” (by Sept 2006). Comparison with 2005 levels would have been appropriate, and would have demonstrated a reduction in 2006.

#### **3.2.4 Referral Process and Refusal Rates**

The conclusions on refusal rates are misleading, given that:

- a) refusal rates have in fact been fairly stable since 1998, and were fairly consistent with GAR refusal rates before IRPA cut off direct access for GAR applicants. The text states that refusal rates are “high” without explanation of the criteria for what constitutes a “high” rate. Using an average of GAR refusal rates only from 2002-2005 is very misleading, particularly as the statistics from the largest post open to self-referrals (Bogota) are not included in the GAR statistics.
- b) “refused cases” are not necessarily cases that have been found to be ineligible or inadmissible. CIC’s limited statistical capacity means that any case not resulting in an arrival is categorized as “refused”, including if it was withdrawn, closed or abandoned.

### **Assessing Refugee Eligibility**

*“Findings from the SAH survey indicated that while questions on application status were the most popular reason for contacting CIC, questions on refugee eligibility was the second most popular reason (see Table 8).”* We note that the relevant SAH survey question (3.7) did not refer only to contacting CIC, but rather also RSTP, other SAHs and the NGO-Government Committee. The follow-up question (3.8) simply asked the reason for contacting “these information sources” without specifying the source. Therefore there is no data to specify that CIC offices were contacted most frequently on these questions. Furthermore, local CICs are not mandated or resourced to give more than very basic information on eligibility issues.

### **Refusal Rates**

Conclusions about training and eligibility assessments cannot be drawn by simply comparing refusal rates. The context of the country of origin and the country of asylum both at the time of the submission of the sponsorship and at the time of the interview must be taken into account in order to accurately draw conclusions.

#### **3.2.5 Co-Sponsorship**

The very small number of resettled refugees interviewed as part of the focus groups means that it is not credible to draw conclusions regarding the support provided to resettled refugees, or their perceptions of their integration. Combined with the inaccurate and incomplete information collected from the SAH and other surveys on the financial support given to refugees (which also took no account of in-kind contributions), the statements lead to conclusions that are not supported by actual data.

Furthermore, the existence of a co-sponsor which is “usually family member” should be recognized as a positive factor, instead of a negative point, as recognized in IRPA.

### **3.3.2 Challenges of Resettlement**

The report suggests that the challenge of “finding employment in a field related to previous careers or skills-training” is linked to “the fact that many sponsored refugees enter the workforce so quickly after arrival”. The failure to make reference to any of the other well-documented factors that make it difficult for any newcomer to find employment in a related field or to upgrade their skills leads to an incorrect emphasis of this factor, and a bias towards suggesting that “so quickly” is “too quickly”. Furthermore, it is disappointing that this evaluation has drawn no conclusions on how the settlement needs of resettled refugees can be addressed through government programs such as more targeted skills training.

### **3.4 Cost-Effectiveness**

This section is the most problematic, due to the data collection flaws mentioned previously, and due to the lack of accompanying data to support information and explain conclusions drawn.

#### **3.4.1 Operating Costs for the PSR and GAR Programs**

The report finds the in-Canada processing costs for the PSR program to be higher on a per application basis than for the GAR Program, without offering clear information about how the figures were arrived at. We are concerned that this may reflect a miscalculation or a totaling of staff costs at CIC headquarters for the PSR Program without including the comparable costs of administration of the GAR Program. In particular, the GAR Program relies on a significant team of CIC staff at local, regional and NHQ levels working on the administration of the Resettlement Assistance Program. It is not clear from the evaluation report that these costs have been included in the calculations of costs for the GAR Program.

There is also no attempt to provide a breakdown or comparison in processing costs between SAH/CG costs and G5 costs. As it is widely known that processing G5 applications takes significantly more time than SAH/CG applications, such an analysis could provide useful data in understanding the pressure points in processing.

No effort has been made to calculate overseas savings from the use of IMM6000 distribution Option 3, which does add work to the inland processing.

#### **3.4.2 Income Support Provided to Refugees**

To say that “*the evidence showed that private sponsors provide less direct financial support to PSRs than the government provides to GARs*” is not supportable without the inclusion of actual data. The evaluators acknowledged that there were challenges in gathering this information, and we feel that the information gathered is incomplete and inaccurate due to misleading and inadequate questions.

Table 13 is misleading because it does not include in-kind support, or indicate that this is not included. In fact, we believe that many privately sponsored refugees receive a higher level of support than that given to GARs, when in-kind support is taken into account. Although in-kind support is acknowledged belatedly in the conclusion, the phrasing is not strong enough to clarify the omission, and could lead to incorrect conclusions.