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Building Quality Justice Services for Newcomers

A Discussion Paper

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A. Introduction

This discussion paper is part of the Canadian Council for Refugees’ “Building Quality Justice Services for Newcomers”. The Canadian Council for Refugees (CCR) was funded to conduct this project by the recently established McLachlin Fund.

The purpose of the project is to support non-governmental organizations (NGOs) in providing high-quality services relating to immigration and refugee legal processes. (We use the term “NGOs” and “CCR members” interchangeably in this paper to refer to CCR members and similar community-based NGOs in Canada; the services that we refer to in this paper are NGOs’ services relating to immigration and refugee legal processes.)

As part of the project, the CCR committed to explore systems – voluntary, incentive-based, or mandatory – for supporting the work of NGOs in this area. This paper, outlining and assessing options for such a system, is the product of this exploration.

B. Context

1. Canadian Council for Refugees and similar NGOs

The CCR is a national network committed to the rights and protection of refugees and other vulnerable migrants, and the settlement and integration of newcomers to Canada. The CCR’s current membership includes over 200 organizations, big and small, located throughout Canada, most of whom offer direct services to refugees, migrants and other newcomers.

CCR members and other NGOs doing similar work provide a wide range of services to immigrants and refugees seeking to live in Canada. Some NGOs provide support with navigating a variety of immigration and refugee legal processes, such as sponsoring refugees, applying to reunite with family members, applying for a work permit or permanent residence, or making a refugee claim; this is the focus of this project and this discussion paper.

The extent to which NGOs provide support with immigration and refugee legal processes varies. For some NGOs, it is a significant part of their work. Others provide some services in this area alongside other services to support newcomers. Some do not provide any services related to immigration and refugee legal processes. (They may focus on immediate or long-term settlement needs, for example, which are not the focus of this paper.) But they will likely refer clients so that they can receive effective assistance with navigating immigration and refugee legal processes.

Funding support for this work is extremely limited. While a wide range of government and non-government funders support NGOs’ provision of services to newcomers, there is very little

funding available to NGOs for providing support with immigration and refugee legal processes (and virtually no government funding).

2. Need for assistance with immigration and refugee legal processes

Newcomers have long needed support with immigration and refugee legal processes. However, several developments in the last few years are, in combination, creating increased and pressing demands on NGOs to assist newcomers.

- Large numbers of people arriving in Canada urgently need to navigate one or more immigration or refugee legal process. Most provincial legal aid programs do not cover the costs of legal assistance for these matters.
- The federal government provides limited support to individuals navigating those processes and, instead, has relied on NGOs to do so. In fact, with the introduction of digital services, the government has downloaded more aspects of immigration and refugee processes onto applicants. The digital systems are often challenging to navigate even for educated Canadians, let alone for newcomers who may not speak either official language.
- At the same time, federal and provincial governments do not generally provide funding to NGOs to provide assistance to newcomers with immigration and refugee legal processes; as noted above, any funding support is hard to come by and unevenly distributed.

In short, NGOs providing assistance with immigration and refugee legal processes – including NGOs that are very small and resource-stretched – are filling in gaps that the federal and provincial governments, and legal aid programs, are unable, or unwilling, to meet.

3. Rationale for exploring options to support high-quality services

NGOs providing support with immigration and refugee legal processes face enormous pressures to serve more people. Despite these pressures, and as discussed elsewhere in the paper, they share a deep commitment to providing effective services and to responding to the reality and needs of those asking for assistance where funded services are not available.

A related reason for NGOs' interest in this initiative is their commitment to continual improvement, recognizing that those who rely on their services are often highly vulnerable. Policy and practices that support high-quality services can help guide NGOs and their staff, interns and volunteers when questions or challenges arise.

Developing policies and practices is, though, only the start: policies and practices must continually evolve, both in response to the external environment – constant changes by government, revisions to funder requirements, and evolving community needs – as well as in

response to internal organizational changes, such as the growth of an organization. Considerable time, and capacity, are needed to put into place, and regularly update, a set of core policies and practices. NGOs are interested in this initiative if it can help them find ways to do this work, on an ongoing basis.

Another consideration driving this initiative is the importance of informing key government funders, such as Immigration, Refugees, and Citizenship Canada (IRCC), as well as legal, academic, and public policy stakeholders, of the huge gaps in services that NGOs address, and particularly gaps relating to immigration and refugee legal processes. Only after government and stakeholders understand the gaps that NGOs fill – client needs that would otherwise go unmet – will they step up to provide funding and other support for this critical work.

Finally, NGOs are interested in this initiative as a way to educate IRCC, and possibly other justice sector stakeholders, about the high quality of their services, particularly services relating to the immigration and refugee legal process. In recent years, IRCC has changed its interpretation of Section 91 of the *Immigration and Refugee Protection Act* to restrict the services provided by NGOs in this area.¹ NGOs participating in this initiative are hopeful that, when IRCC understands the nature and quality of their services, and the critical role they play in supporting immigrants and refugees, it will revert to the correct original interpretation. A system that supports and, perhaps, verifies high quality in some way may be helpful for this purpose.

C. Features and core policies that support high-quality services

We've listed below key features and some of the core policies that many NGOs have in place, or would like to have in place, to support their provision of high-quality assistance with immigration and refugee legal processes.² The policies and practices may be written and formally approved, or they may be understood by staff but not articulated in a single written document.

Some NGOs, especially smaller ones, lack the resources and capacity to develop and maintain many formal policies (work that is not typically eligible for funding); their dedication to providing services to their communities takes precedence. Many NGOs have some policies in place, but want to expand, improve or update them. Regardless of the status of their library of policies and

¹ The CCR believes that IRCC's interpretation is wrong and has presented a legal analysis supporting our opinion.

² We note that some of these features are reflected in the "[Accredited Representative](#)" program in the US, which enables non-profit organizations serving low-income communities to register as accredited representatives (full or partial) for the purpose of representing people before administrative bodies and immigration courts.

practices, NGOs providing free assistance with immigration and refugee processes are set up, foundationally, to ensure ethical operations.

Key features and core policies that support NGOs in providing high-quality assistance with immigration and refugee legal processes include the following.

1. Set up as a community-based non-profit

NGOs providing assistance with immigration and refugee legal process are operating in the community non-profit space. They have formal or informal mechanisms in place to ensure ongoing responsiveness and accountability to the particular communities they serve, and are well-positioned to develop and deliver services that respond effectively to the needs of their communities.

This responsiveness – to the specific needs of particular populations, such as LGBTQ refugees or newcomer women experiencing violence – is the driving force behind these NGOs' work. This one-way accountability and responsiveness supports the ethical framework for NGOs' services.

2. No fee charged for assistance with immigration and refugee legal processes

NGOs do not charge fees for assistance with immigration and refugee legal processes (and do not solicit or accept donations in return for these services), and thus do not create risks of financial abuse or financial mishandling. Such risks are present where fees are charged and money is exchanged, as with for-profit service provision. People who are new to Canada, who do not speak an official language, and who may have experienced trauma are particularly vulnerable to being taken advantage of.

3. Defined scope of service

NGOs define the communities they serve, and the assistance they provide with immigration and refugee legal processes, and are thus able to focus on and specialize in providing high-quality services with respect to that assistance. This does not mean that the definition of services is always precise, that exceptions are not made, or that the definition doesn't evolve over time. But it does mean that NGOs know whom they serve and what services they provide, and are able to develop expertise with a particular process. (For example, an NGO may assist with work permit applications, but only for refugees and not Temporary Foreign Workers.) People who need an NGO's services are also able to understand what support is available when this is defined and clearly communicated.

4. Key policies and guidelines in place

Many if not most CCR members have in place key policies and guidelines – formal or informal – that they rely on to guide their efforts to provide assistance with immigration and refugee legal processes. Those policies support them in operating prudently, ethically, and transparently, and can assist when complaints or problems arise. They are particularly useful for giving clear guidance to staff, interns and volunteers on key operational matters.

Policies that organizations decide to put in place vary, depending on each NGO's services, but CCR members have identified the following policy areas as key to supporting their work: training and knowledge sharing; client referrals; and ethical principles: code of conduct, confidentiality, conflict of interest, and complaints and feedback.³

D. Options for supporting high-quality assistance

This section outlines four options for programs or systems to support high-quality assistance with immigration and refugee legal processes.

1. Resource centre or training hub

a. Resource centre on immigration and refugee legal processes

The CCR, or another coordinating body, could develop and implement a resource centre that would provide easy access to relevant and up-to-date information resources with respect to immigration and refugee legal processes.

A resource centre of this type already exists for the area of private sponsorship – see the [Refugee Sponsorship Training Program](#), funded by IRCC. In other areas, there is no equivalent resource, despite the complexity of processes, and frequent introduction of new processes by government.

A resource centre with this focus could provide ready access to the latest information from government relating to immigration and refugee legal processes. It could also supplement that information by enabling organizations to share practical information and processes they've developed and learn from each other as things change.

Efforts would need to be made to monitor, curate, and organize the information such that organizations using the resource centre could easily be alerted to, and find, resources on a

³ See CCR's [Proposed framework for high quality immigration and refugee services](#)

particular topic, in a timely way. And it would be important to identify a process for keeping the hub responsive and up-to-date going forward, especially given how often the government updates forms and processes in the sector.

b. Training hub

A training hub could be set up to house a collection of training events, online courses, webinars, and other training opportunities and resources, on a particular theme or topic. A vast amount of training is available in the sector, so it would be important to identify the purpose and focus of a training hub, the criteria for including training opportunities in the hub, and how to select which training opportunities to include or remove from the hub once outdated. (And some training programs offer certificates of completion or other form of “credentialling”; see www.oaith.ca/train/training.html.)

A number of similar training hubs currently exist in various community service sectors, and these would need to be reviewed so that a hub could build on what exists. See, for example,

- <https://settlementatwork.org/resources/competencies-frontline-settlement-counsellors-canada>
- <https://www.oaith.ca/train/training.html> for the violence against women sector
- <https://findhelp.ca/training/> for information and referral training

c. Policy resource centre

Building on this project, a resource centre could be established that would focus less on training, supports, and developments relating to legal processes *per se*, and would instead focus on supporting NGOs in the development of policies and practices that support high-quality services. It would build on this project and the guidelines that have been created through it.

For example, the guidelines collection could be expanded to include sample policies, policy templates, and other resources (either from external sources, such as from Imagine Canada, and see <https://guide.hrintervals-intervallesrh.ca/hc/en-ca>, or samples from CCR members). NGOs could share policies and practices, and learn from each other, in a form of a community of practice. And a resource centre could offer information on various self-assessment and accreditation options that some NGOs may be interested in.

d. Next steps

A further exploration of the options for a resource centre or training hub might involve:

- Convening a meeting to discuss interest in a resource centre or training hub, and to identify the focus and purpose of such a project
- Conducting an environmental scan to identify similar programs – to begin to form the content of a centre or hub, prevent duplication, and ensure that a centre or hub builds on what exists

2. Voluntary self-assessment

Going one level deeper, the CCR or other body could establish a system for NGOs to participate in a self-assessment exercise, and receive confirmation of completing the process, with or without an indication that they have “passed”. The framework and guidelines for ensuring high-quality services developed by the CCR could form the standards against which organizations would assess themselves.

Self-assessments are often used as educational tools that can help inform organizations (and individuals) about how “healthy” they are in particular areas. (See, for example, <https://www.imaginecanada.ca/en/organizational-resilience>.) A self-assessment exercise could be narrow, covering a particular topic (such as self-assessment with respect to having a good referral process) or broader (such as board governance, or assessment of organizational health – see <https://coco-net.org/wp-content/uploads/2012/08/Nonprofit-Organizational-Assessment-Tool.pdf>).

The process for a self-assessment could be as simple as applying a checklist, or could be set up as an interactive exercise that asks organizations to rate themselves in a number of different areas (based on indicators); each area of assessment could link to training opportunities or resources that would support improvement. A self-assessment exercise could also connect CCR members to peer organizations, to participate in the assessment with respect to particular questions, or in other ways.

Finally, a host body – the CCR or other – could offer a “certificate of completion” when organizations have gone through the self-assessment process, or a “stamp” indicating completion of the process with some sort of “passing score” that the organization could post publicly. (Such symbols are also given by more formal accreditation systems.) Organizations might be interested in applying for this “stamp” of approval as way to show those they serve, as well as funders and stakeholders, that they have engaged in a process relating to quality services and have “passed”. (See BC’s Better Legal Information self-assessment: <https://betterlegalinfo.ca/self-assessment/>.) The process could involve time for organizations to go from “needs improvement” to “pass”.

Next steps

A further exploration of this option might involve:

- Convening a meeting to discuss interest in developing a self-assessment tool, perhaps with a particular focus
- Conducting an environmental scan to identify the use of self-assessment tools in the community service non-profit sector, including how they're helpful, what they cover, how they can be used, how input and assistance from peer organizations or community members could be incorporated, and whether a "pass" is helpful to convey quality

3. Accreditation systems

The CCR or other body could explore developing a system of accreditation for CCR members, that they could choose to participate in. This exploration could include the possibility of adapting an existing accreditation system, or developing a customized system, that would address CCR members' particular realities and needs. Alternatively, it could research the availability of existing accreditation systems that individual organizations could choose to participate in, and share information about them with CCR members.

Several accreditation agencies work to accredit non-profit organizations in Canada.

a. Imagine Canada

Imagine Canada operates a "Standards Program" that focusses on the accreditation of charities and non-profit organizations. It currently accredits over 200 charities and non-profits across Canada, in a range of sectors, including some organizations working in numerous fields, including health services (for example, Canadian Association for Mental Health and Autism Canada), poverty reduction (for example, Food Banks of Canada and Habitat for Humanity), and victim support (for example, Elizabeth Fry and John Howard). According to a senior leader in Canada's accreditation sector, Imagine Canada's accreditation program focuses on processes and systems (governance, financial, and so on), in contrast to service delivery.

Imagine Canada's Standards Program defines standards in several areas, including:

- i) Board Governance (includes code of conduct, privacy policy, and complaints policy)
- ii) Financial Accountability and Transparency
- iii) Fundraising
- iv) Staff Management
- v) Volunteer Involvement

Organizations that apply for accreditation go through a four-step process. In Step 1, they become part of a “Standards Community” and, in Step 2, they work with peer reviewers and coaches from other accredited organizations for guidance and samples. Once accredited, the organization is awarded the use of a “Standards Program Trustmark” graphic that they can share publicly.

An accredited organization’s compliance with the standards is monitored annually. Participating organizations must apply for accreditation every five years.

b. Canadian Centre for Accreditation

The Canadian Centre for Accreditation (CCA) focuses on the accreditation of community-based health and social service organizations. It accredits organizations working in numerous fields, including child welfare, community mental health and addiction, community-based support and social services, credit counselling, and youth justice services. According to a senior leader in Canada’s accreditation sector, the CCA sometimes partners with networks of community-based organizations to develop an accreditation system for individual member organizations.

The CCA has two types of standards. All organizations must meet the “mandatory standards”, which include legislated requirements, and safety or risk issues. And they must meet a certain number of “leading practice standards”, which promote quality, learning, creativity, and excellence.

The CCA accreditation process involves six steps. The process includes a site visit that takes place about two years into the process, which means that service delivery is part of the focus of accreditation. In the two years leading up to the site visit, an organization is expected to do a self-assessment and develop a workplan. The CCA provides training and resources to support the organization as it prepares for the site visit.

Quality updates are expected annually. The CCA accreditation lasts four years. Accredited organizations are provided with a certificate of accreditation.

c. CARF Canada

CARF Canada is part of CARF International (the Commission on the Accreditation of Rehabilitation Centres), a U.S. based accreditation organization. Some employment and community service organizations, primarily in Western Canada, participate in the CARF Canada accreditation process. CARF has standards for administrative practices as well as program/ service delivery.

The accreditation process involves numerous steps, and includes the provision of guidance and assistance from CARF staff during the accreditation process. Steps in the process include a self-evaluation vis-à-vis the standards, and a site visit.

CARF may accredit an organization for three years, one year, or provisionally. Accredited organizations must submit a quality report annually, and CARF carries out an annual review. CARF also provides accredited organizations with a seal that they can share publicly.

d. Other accreditation agencies

Other accreditation agencies working in Canada are less active in non-profit community and social services sectors. These include:

- Accreditation Canada (AC), which is an affiliate of the Health Standards Organization (HSO). It focuses on the accreditation of health service organizations, and occasionally social service organizations, using standards based on the HSO and International Standards Organization (ISO).
- Council on Accreditation Canada (COA), which is connected with the U.S.-based Council on Accreditation. The COA Canada accredits social and human services organizations, including for-profit organizations, public agencies, and non-profits.

e. Next steps

A further exploration of the options for establishing an accreditation program might involve:

- Convening a meeting to discuss whether further research of these options should be conducted
- If so, identifying accreditation agencies for further research, including costs to participate and to carry out improvements to meet standards (and the availability of funding support)
- Investigating examples of where an umbrella group or network of non-profits in Canada – similar to the CCR – have worked with an accreditation program to develop a system that is driven by and reflects their needs

4. Participate in the College of Immigration and Citizenship Consultants

Finally, another option would see the CCR or other body work with the College of Immigration and Citizenship (the College) to incorporate a new category of “consultants” into the College that would include staff at non-profit organizations that provide services related to immigration and

refugee legal processes. (The College is authorized to set up different tiers, which could include a tier for NGOs.)

According to its website, the College “is a self-regulatory organization” that “licenses and regulates Canadian immigration and citizenship consultants in the public interest”. It is governed by a board of directors composed of four consultants licensed by the College and five public representatives (non-licensees) appointed by the Minister.

For many years before the College was established (in 2019), news reports and studies discussed situations in which newcomers received poor services or were financially abused by immigration consultants. It was in this context that the federal government set up the College; the federal government created the College as a self-regulated organization because “it is understood that:

- Immigration and citizenship consultants have specialized knowledge and expertise, and
- Immigration and citizenship consulting can be trusted as a regulated profession.”

The College licenses individuals providing services; it does not apply at the organizational level. (There may be some openness to exploring the establishment of a tier for NGOs that would apply at the organizational level.) It “sets standards of education, professional practice and ethics” for individual licensees, almost all of whom provide for-profit consulting services not connected with a community organization.

The foundations, purpose, and accountabilities of the work of community-based NGOs are quite distinct from the work of immigration consultants, most of whom work as individuals in the for-profit space. While NGOs are the first to acknowledge the need for “specialized knowledge and expertise”, as well as the importance of working ethically and in a trustworthy manner, there are likely to be challenges if efforts are made to bring them into a self-regulated body that governs primarily for-profit consultation work. Among other challenges, a primary concern is whether such a move would hinder or obstruct the work of an already stretched NGO sector that fills critical gaps for highly vulnerable immigrants and refugees.

Next steps

A further exploration of this option might involve:

- Convening a meeting to discuss whether there is interest in exploring this option further and, if so, next steps

E. Considerations in assessing options for supporting high-quality services

This section of the report identifies several considerations that may be helpful in assessing options for supporting high-quality services.

1. Time/ resources to participate (by an NGO):

How much time, resources, and staff involvement – and related capacity and funding – are needed to participate in a program or system to support high-quality services provision? What does participation in a program or system look like – what does it involve?

2. Time/ resources to coordinate (by the CCR or other body):

How much time and resources are required to develop, implement, and maintain/ update the program or system? How much funding would be required to develop and implement the program or system, and how likely is the CCR or other coordinating body to be able to access it?

3. Reflects and respects differences in capacity:

How would the program or system take into account differences between organizations – the people they serve, how they serve them, and their capacities? Can it be tailored to meet the needs of smaller organizations, and organizations for whom assistance with refugee and immigration legal processes is only a small part of their activities?

4. Led by organizations doing the work:

How much are the NGOs doing the work – who are in the best position to identify what “high-quality services” mean – leading or driving the development of the program or system?

5. Applies at the organizational level:

Would the program or system apply at the organizational level (even if participation, such as in training program, is for individuals) or at an individual level?

6. Educates stakeholders and demonstrates quality

To what extent will the program or system serve to educate IRCC and other key stakeholders about the essential work of NGOs in this area, the existing level of high-quality services by NGOs, and the commitment to continual improvement and excellence?

F. Consideration of options for supporting high-quality services

<p>Options to enhance quality of services</p>	<p>Required resources/ intensity of effort: enables wide participation by CCR members; modest resources and effort required for implementation and oversight</p>	<p>CCR members-driven and led: informed and driven by CCR members, recognizing diverse perspectives and capabilities to support quality services</p>	<p>Demonstrates quality: shows that program/ process is in place to promote/ support high-quality, ethical services by CCR members</p>
<p>Resource centre or training hub</p>	<p>Resources would depend on the scale of the initiative. If limited to sharing existing resources and training, it could be modest or even minimal. This would require CCR members, or a committee, to identify the fundamentals: scope/ focus, approach and process, funding availability, etc. To be effective, some permanent funding would be necessary.</p>	<p>The CCR would drive and lead the formation and maintenance/ updating of a resource centre or training hub, responding to member priorities and /or building on the guidelines created through this project for future policy development.</p>	<p>The development and use of a resource centre or training hub may not convey “high quality” to IRCC and other stakeholders (government bodies, associations of legal professionals). Service users are less likely to be looking for formal indicators of quality, but instead are likely to consider whether an organization is embedded in their community, understands the context of their lives and problems, and can be trusted to not take advantage of them financially.</p>
<p>Voluntary self-assessment</p>	<p>Resources required to set up and oversee a voluntary assessment depend on the scope, operation/ interactivity, platform, and other features. The CCR could decide how simple, complex or comprehensive it would be (for example, whether to provide a certificate of completion, or a “stamp” that a self-assessment was completed). The CCR could also decide whether to seek funding for such a tool.</p>	<p>The CCR could decide on the fundamentals of such a tool: who would host and coordinate, what would be assessed, and whether it would generate a certificate of completion or a “stamp” that the organization has passed. The CCR could also identify the role of peer support/ advisors, or other external experts.</p>	<p>Depending on how the program is set up, organizations that have gone through a self-assessment process may be able to publicly post a certificate of completion, or a “stamp” or “seal” of quality. IRCC and stakeholders may consider this to be helpful, depending on the content of the self-assessment exercise. Again, service users may not turn to formal indicators as verification of quality.</p>

	Required resources/ intensity of effort	CCR members-driven and led	Demonstrates quality
Accreditation program	The accreditation programs described above would likely require organizations to have considerable resources to participate, and smaller, resource-stretched organizations would face barriers to participating. Conversely, organizations that are already accredited might find it burdensome if they were expected to engage in an additional accreditation system. Currently, funding is not generally available for these purposes.	The accreditation programs listed above reflect extensive accreditation experience. The CCR could strive to work in partnership with one of the accreditation agencies, such as the CCA, to develop standards that reflect the work of CCR organizations, but it is likely to have to comply with some of the structures/ standard practices and processes that the accreditation agencies regularly use; the CCR may be guided by the accreditation agency, rather than the other way around. The accreditation process would involve external verification by the accrediting organization.	CCR members' participation in an accreditation program may help instill comfort with the quality of services by IRCC and other stakeholders (government bodies, associations of legal professionals). Again, service users' confidence in the quality of services is less likely to be affected by such formal recognition.
Licensed group as part of the College of Immigration and Citizenship Consultants (CICC)	Assuming that individual staff at NGOs would be licensed by the CICC, participating in a licensing regime would be resource-intensive to the individual staff at organizations, such that many would not be able to seek licensing and would face barriers in maintaining licenses. Given high staff turnover, NGOs could not be expected to maintain individual staff licensing. (Conceivably, the CCIC could explore creating a tier for NGOs to be licensed at the organizational level.)	The development of a licensed group for NGOs/ CCR members under the CICC is likely to be guided and overseen by the CICC; at a minimum, it will need to be approved by the CICC. As discussed above, the primary focus of the CICC (for-profit delivery of legal advice by consultants) is not the focus of CCR members.	CCR members' participation in CICC's licensing regime may help instill comfort with the quality of services by IRCC and other stakeholders (government bodies, associations of legal professionals). Again, service users' confidence in the quality of services is less likely to be affected by such formal recognition.

G. Next steps

This paper has identified a number of approaches that the CCR could pursue for supporting and demonstrating the quality of services provided by NGOs to people who need help with immigration and refugee processes. The approaches range from a “light” approach – such as a resource centre or training hub – that would enable NGOs to participate to the extent that they have the capacity and interest. At the other end of the spectrum, a more resource- and process-intensive approach could see the CCR working with an accreditation regime to develop an accreditation process that CCR members and other NGOs could decide to participate in. A middle-ground approach would be the development of a voluntary self-assessment tool, which could be as simple as a checklist.

With such a range of options, assessing next steps can be daunting. An initial step could involve setting out some of the practical considerations that might help guide the CCR in moving forward. Those considerations might include the following.

- Does the CCR/ the NGO sector have the capacity to move forward with a particular approach?
- Are some of the approaches likely to place unrealistic demands on small, resource-stretched NGOs?
- How likely is it that funding can be obtained to support NGOs’ participation in a particular system? to support the CCR in leading an initiative?
- Would a meeting with the IRCC – to find out whether there might be interest on their part in providing some concrete support with respect to any of these options – be helpful?