Canadian Council for Refugees
Submission to the Independent Blue Ribbon Panel on Grants and Contributions
Programs
October 2006

The Canadian Council for Refugees is a non-profit umbrella organization committed to the rights and protection of refugees in Canada and around the world and to the settlement of refugees and immigrants in Canada. The membership is made up of organizations involved in the settlement, sponsorship and protection of refugees and immigrants. The Council serves the networking, information-exchange and advocacy needs of its membership.

The CCR has three Working Groups which are the forums where members exchange information, network and develop policy positions in particular areas of concern. They are responsible for preparing resolutions and planning workshops at the consultations, as well as for advising the Executive on policy. The Working Group on Immigration and Settlement looks at all issues relating to refugee and immigrant integration in Canada.

The following submission is conceived within the framework of the Voluntary Sector Initiative (VSI) Accord and Codes of Good Practices on Funding and Policy Dialogue. Signed between the Government of Canada and the not-for-profit (or voluntary) sector in the early 2000s, these texts enshrine a set of principles and values that should guide the collaboration between the government and the voluntary sector. Both the government of Canada and the immigrant and refugee serving sector should renew their efforts to make these texts known and used in the context of funding practices and policy dialogue.

The Accord and the Codes are not legally binding but they do constitute a commitment on the part of both the federal government and the voluntary sector. They enshrine values and set out principles that are expected to guide the relationship between them. It should be noted that, where there is provincial devolution or co-management, the CCR considers that the federal government still has a responsibility to ensure comparable parameters across Canada. The values articulated in the Accord include active citizenship, equality, diversity, inclusion and social justice. Among its principles, the Accord affirms independence, which includes the right of voluntary sector organizations to challenge public policies, programs and legislation and to advocate for change, and dialogue, which should be carried out in a way that respects each party's confidential information, and builds and maintains trust.

The voluntary sector is valued by the VSI Accords and Codes for its unique connection to communities, among other things. Yet, in the context of the immigrant and refugee serving sector, currently prevailing funding practices frequently depart from the values and principles of the VSI Accord and Codes. Settlement agencies' ability to engage in meaningful and fruitful policy dialogue is curtailed by these practices, with the result that community-based perspectives are underrepresented in policy-making about immigration and settlement in Canada. At a historic moment in which immigration is central to Canada's future, the country

as a whole loses if we do not use to the full the riches (experience, specific knowledge, creativity, etc.) of the not-for-profit sector.

In this submission we have focussed on specific issues identified as important by our membership and relevant to the work of the Blue Ribbon Panel. Many of these concerns have been raised by the Panel in its Consultation Paper.

1. **Multi-year funding**

Having to re-apply every year for funding for an ongoing program or a multi-year project is inefficient and time consuming and undermines efforts at long-range planning. Yet, multi-year funding is not the norm for many government programs supporting settlement services for refugees and immigrants. This has negative effects on the settlement sector's potential for increased efficiency, one of the values enshrined in the VSI texts. It also makes for funding practices that are themselves inefficient.

2. **Reporting requirements**

The government's accountability framework for settlement services should be developed in a manner that strengthens, facilitates and improves service design and delivery. It should acknowledge the complexities of managing both small and large NGOs and should strive to facilitate sound and efficient management. It should also clarify the distinctions and interconnections between performance measurements/program evaluation; outputs/outcomes and quantitative/qualitative indicators.

It is also important to emphasize the need for accountability measures to be developed in a manner that is itself transparent and accountable, involving meaningful two-way consultations. This requires that funding practices be guided by the recognition, made explicit in the VSI texts, that while the two sectors (government and voluntary) have to be accountable, the nature of accountability is different for each sector. Government officials need a full awareness of the different aspects that define voluntary agencies' accountability.

Funder micromanagement of the settlement sector has increased significantly. This results in more administration on the part of the NGOs to document services (meaning less time to actually deliver services), and more paperwork to file claims. Financial and activity monitoring of agencies by funders has become more intrusive. Federal government staff are felt to have, on occasion, treated NGOs with hostility and suspicion. At the same time, NGOs note that the government does not always appear to apply to projects that they themselves undertake the same evaluation demands that they apply to NGOs.

The CCR has questioned different aspects of iCAMS (the Immigration Contribution Accountability Measurement System put in place in recent years by Citizenship and Immigration Canada). This quantitative system was instituted without a clear demonstration that it would deliver data that could be meaningfully used to evaluate or improve services. Yet, the data-collection is extremely time and energy consuming for NGOs. A further serious concern is that the client's privacy rights are undermined. This is not only troubling in itself, but also has negative impacts on the trust relationship that agencies need to establish with service users. In addition, agencies' autonomy and independence have been seriously affected since the iCAMS procedures place our organizations in a situation where they seem to be acting as agents of the government.

3. **Government relationship with NGOs**

Ideally, the government should see itself in a meaningful partnership with NGOs to allow for the best possible policy and programming. This involves government officials having expertise in the service area they oversee, understanding the concepts related to "community funding" and being encouraged to consult meaningfully with partners, to show creativity and flexibility – and to recognize fruitful creativity and flexibility on the part of settlement agencies.

Unfortunately, the current model favours instead an emphasis on narrowly conceived financial controls and the application of rules. The responsibilities of government officials are on occasion understood quite narrowly by some staff who tend to view themselves primarily as auditors ensuring compliance with Treasury Board requirements. Such an approach does not lead to the most constructive programming. Again, we see that a lack of attention to the value of efficiency that should guide funding practices has a negative impact on the voluntary sector's ability to make significant contributions according to the best of its assets.

4. **Accessibility**

Funding programs need to be accessible so that the organizations that can best conceive the programs and deliver the services receive funding, rather than those best able to negotiate a complex and demanding application process or to meet burdensome reporting requirements. This is particularly important in the settlement sector, where small organizations and new organizations created by less privileged newcomer communities (e.g. racialized newcomers or newcomers facing gender-based forms of oppression) may need particular support as they develop the capacity to meet requirements. Without specific attention to accessibility, the funding ends up going to those who have already been able to build up a "capital" of know-how in the Canadian context.

Funding practices should also ensure accessibility for the voluntary sector as a whole, taking into account the fact that this sector has historically contributed in so many ways to the improvement of settlement outcomes in Canada. In contrast, the for-profit sector, which may have powerful infrastructure and huge material and human resources, lacks the experience, the expertise and, by definition, the community-based perspective that is key to facilitating a sensitive and successful settlement and integration process.

5. **Financial issues**

a) **Constraints of financial year end**

The fact that funds often have to be spent in a great hurry before the end of a financial year creates obvious problems and often leads to a reduction in quality as organizations struggle to meet these artificial deadlines.

b) **Delays in payment**

Funders need to be accountable to the service providers and newcomers by implementing timely application and approval target dates to ensure that new contribution agreements are signed and new year advances are released before existing contribution agreements end.

c) **Funding full costs**

Funders often decline to cover the full costs of delivering services they fund. For example, they often refuse to cover related administrative costs. The failure to cover the administrative costs of participating in programs weakens the organizations that are delivering the services, since realistically there are no obvious sources of funding for the administrative costs related to offering government-funded programs

6. **Promoting creative and participatory processes**

Some funding application processes require detailed information about how the project will develop. This undermines the ability of project holders to allow participants in the project to share in the decision-making about the development of the project. In order to promote creative and participatory processes, funders should recognize that a project plan may need to be determined by the participants in the course of the project. It is also important that funders appreciate the value of creative initiatives and not rely solely on formal, bureaucratic elements.

7. **Advocacy**

The independence of voluntary sector organizations includes their right within the law to challenge public policies, programs and legislation and to advocate for change. As clearly stated in the VSI Accord and Codes, advocacy is inherent to debate and change in a democratic society and it should not affect any funding relationship that might exist. In practice, however, the advocacy role of organizations both at the broader policy level and individual client level is seriously curtailed. The reasons include concerns by organizations that they may lose funding if they are critical of the funder or government; Revenue Canada limits on the extent to which charitable organizations may do advocacy; and the lack of recognition by funders of advocacy as a legitimate role for service providers.

Everyone in Canada can benefit from a strong voluntary sector, and this is well reflected in the vision of country-building enshrined in the VSI Accord and Codes. At the end of the day, it should be clearly understood that meaningful and effective advocacy is a central part of the voluntary settlement sector's accountability, both from the point of view of the newcomer communities that we serve and of the country as whole, which has an undeniable stake in the rapid and full integration of newcomers.

8. **Tendering – an example of problematic relationships**

To give a specific example of problems facing agencies in their relation with funders, tendering can have negative impacts on NGOs. First, it can lead to tension between agencies as they are set against each other within a competitive environment. Second, there is a huge amount of work put into competing through submissions (in some cases, 160-page applications). Third, this may bring stress as agencies and workers face losing jobs, and end of services.