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January 27, 2017

The Honourable Jean-Yves Duclos
Minister of Families, Children and Social Development
Employment and Social Development Canada
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister:

The Canadian Resource Centre for Victims of Crime (CRCVC) is writing to you concerning the Confidential Services for Victims of Abuse (CSVA) program, an identity change and relocation service. We understand the program is designed for victims of intimate or familial violence who are at the greatest risk of serious or lethal harm from their partner. We are writing because we have a number of concerns about the functioning and effectiveness of the program.

Can you please explain the role of the provinces/territories and the supports they provide to clients as partners to the program? Is CSVA a federal program with provincial administration? With regards to the enrolment process, federal program officials have told us that only oral confirmation can be provided to clients. Clients must receive official documentation to confirm their enrollment. If not, this leads to potential abuse of processes and misunderstandings. Client access to their records should also be available upon request, even if it's just to view them.

Is the CSVA eligibility criteria still the following (bulleted list below) and who is responsible for the decision that a client is eligible to enter or not?

- 1) Legally allowed to permanently reside in Canada;
- 2) Sole custody with no legal access to the other parent or third party, no mobility restrictions and no court follow-up;
- 3) No warrants or active criminal investigations;
- 4) Risk and threat assessment completed;
- 5) Debts must be resolved or have a resolution strategy in place;
- 6) Confidential change of name in their province/territory of residence;
- 7) Criminal record check;
- 8) For their own safety, they must break ties with family, friends and their past;
- 9) Criminal and/or civil matters must be resolved.

My office is in contact with several women who were encouraged to enter the program, but then left without any identification documents at all and no support. We've received reports from women who are left financially destitute, on the run, with no healthcare coverage, and no social assistance. Some are forced to live in shelters while others cannot access transition shelters because without an income or access to government social assistance, they are unable to pay rent for long term shelter programs. Short-term emergency transition shelters will not accept them because they have 30 day limits on



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shelter stays. Some shelters want to collect all personal information, including abuser info, which cannot be provided for safety concerns. Homeless shelters are also not an option due to safety concerns. These women have reported to my office that they have no ability to secure employment or even personal bank accounts because all of their identification has lapsed or is tied to their old identity. They remain concerned about the security of their personal information (some had their new identities breached).

We feel the program lacks accountability which can lead to the systemic abuse of already very vulnerable women (and their children). Although it is understood that secrecy is an important aspect to the functioning of the CSVA for women’s safety, there must be transparency in order to ensure the women who meet the criteria actually receive confidential, secure identities and relocation to safe housing with ongoing supports.

We strongly believe that the inclusion of oversight outside of the federal government, (i.e. from women’s advocates and Parliament) is needed. Without this, the program will continue to operate under a veil of secrecy, and the fate of its clientele will remain uncertain. In addition, we feel that the program should release an annual report sheds some light on the operations of the CSVA. The report should include things such as the number of women enrolled, length of time it takes to provide secure identities, the government departments involved, what the provincial/territorial role is, what identity documents are provided, the costs of administering the program, complaints received, and so on.

We ask that you immediately develop a secured complaints process for clients of CSVA. We also believe an audit of the program is necessary to determine how effectively it is serving Canadians, if at all. We feel that a legislative framework is necessary in order to clearly outline program policy and ensure some accountability to those who may require services, including some form of recourse or complaints mechanism (which does not currently exist). If the federal government is trying to fully and effectively confront gender-based violence, the Confidential Services for Victims of Abuse program (formerly NIVA) needs to be diligently evaluated.

We remain very concerned about the numerous complaints we’ve heard from women, some of whom have been threatened by program administrators or police when they try to air grievances. Women and children who enter the program should be guaranteed safety and not be left without follow up supports or financial assistance. In fact, we believe the federal government owes a duty of care to the women in their new secure, location. We look forward to your response.

Sincerely,

Heidi Illingworth
Executive Director

Cc The Honourable Maryam Monsef, Minister of Status of Women
The Honourable Jody Wilson-Raybould, Minister of Justice and Attorney General of Canada