



## **Analysis of Policies Affecting Immigrant, Refugee and Visitor Women Who Experience Violence:**

### **REPORT ON CONSULTATION**

In March 2006, as an extension of our work on immigration issues, Community Coordination for Women's Safety extended an invitation to six agencies or individuals to consult with us regarding policies affecting immigrant, refugee and visitor women who experience violence (see invitation in appendix). Two of the parties that we invited were not able to participate in the consultation. Those who did participate were: Rosa Arteaga, Olatz Sagarduy and Darla Tomeldan (Battered Women's Support Services, Vancouver); Shashi Assanand and staff (Vancouver and Lower Mainland Multicultural Family Support Services) and Bally Bassi (Prince George Elizabeth Fry Society).

The following is a list of recommendations from the submissions, categorized by the bodies that would be responsible for making the proposed changes. Please note that some recommendations require action from more than one body—for example, some recommendations under Immigration Canada also require action by the Ministry of Employment and Income Assistance. Acronyms at the end of each recommendation denote the organization that made the recommendation.

The recommendations are followed by a series of principles for effective response, also gathered from the consultation.

#### **A. RECOMMENDATIONS**

##### **A.I. IMMIGRATION CANADA**

###### **A.I.1. Gender inequity in immigration requirements**

The following policies/practices limit women's ability to enter Canada legally: awarding points for education, professional experience, and language ability, which women from other countries may have less opportunity to develop; focusing on economic criteria and disregarding unpaid work in the family and volunteer work in the community; and charging high immigration fees, which women are less likely to be able to afford.

Because of the limitations described above, most women do not qualify as independent applicants to Canada. Women are most likely able to migrate to Canada through the Live-in Caregiver Program, as a mail-order bride, as a sponsored spouse, or as an exotic dancer. The limitations also increase the likelihood that women consequently may be subjected to trafficking.

**We recommend that the points system and immigration fees be abandoned or reworked in order to increase women's ability to come to Canada legally as independent applicants. This will reduce risks to their safety that arise through being dependent on their spouse, through working as a caregiver, exotic dancer, etc or through trafficking (BWSS).**

**A.1.2. Dependency on abusive sponsor for immigration status**

A sponsor must sign an undertaking to provide for their relative's essential needs for a period of 10 years. This is somewhat problematic as the sponsorship term can escalate the dependency that occurs for an immigrant woman who is being abused. The sponsors continue to have control even when the immigrant woman is no longer in the relationship. A woman is at risk of being deported if her application is dependent on her spouse or partner and she separates. Applications take time to process and women stay in dangerous situations because they have no choice. Exclusions and restrictions regarding access to health care, education and jobs; blackmail and fear of deportation; and fear of separation from their children exacerbate a woman's insecurity and vulnerability. Women risk being deported, especially if they call the police and the abusive spouse withdraws his sponsorship. Sometimes, the sponsor not only withdraws his sponsorship but may also try to obtain custody of the children.

Some women have been hesitant in calling the police for fear that their abusers will be deported. Under the *IRPA*, a non-Canadian citizen with a criminal conviction can be removed from Canada. Women often feel guilty about having to send anyone back to a war-torn and/or poverty-stricken country. The *IRPA* also stipulates that someone convicted of an offence that results in "bodily harm" against a member of their family or their spouse or partner's family cannot sponsor anyone. This is also true if they are convicted of attempting or threatening to commit this kind of offence. This has had an unintended effect of discouraging women from cooperating with prosecution of their abusers, because they want to avoid a situation where they would be prevented from bringing their close relatives to Canada, but need the abuser's support to provide the required sponsorship.

**Immigration should establish provisions to recognize breakdown of sponsorship due to violence. These provisions would include definitions/recognition of: power-based crimes, marriages of convenience, safety issues for women and children, the impact on the marriage of a victim's extended family both in Canada and in the country of origin (PGEFS).**

**Once a sponsorship application is in process, even if the sponsor, who is the abuser, applies to withdraw the application, CIC should process such applications either on the woman's merits and/or on humanitarian and compassionate grounds (VLMMFSS).**

**Immigration Canada should consider expediting the processing period for the sponsorship applications. Many abused women are risking their lives because of the slowness of the system (VLMMFSS).**

**Policy with regards to break down of sponsorship needs to be inclusive of senior women who have been sponsored by the adult children and are being abused (VLMMFSS).**

**We recommend that CIC consider abuse a ground to guarantee landed status to women who report it, on the basis that it is a life-threatening situation. This consideration should include refugee women as well (BWSS).**

#### **A.1.3. Refugee claims and women dependents**

When a family unit makes a refugee claim, there is a principal applicant, and the spouse and children are dependants. If there is a breakdown of the marriage, there is no policy that automatically takes the dependant out of the claim. The main applicant can choose to keep her or leave her out. Also, lawyers representing the family unit decide to either take the dependants out or to withdraw from the whole case, as it creates conflict of interest for the lawyer to represent them.

Women in this situation rely heavily on proper legal advice, and legal advice, resources and legal representation are often either expensive or scattered. We often find that women in abusive relationships receive information through their abusers, as abusers work very hard in isolating women from their family, friends and community. Thus, women may not know what legal resources are available in the community.

**Citizenship and Immigration Canada should develop a policy to protect women who, as a result of the relationship breakdown, are taken out of the refugee claim process and left in legal limbo. CIC should develop a protocol to offer women in those situations the needed legal information about their options in navigating the immigration legal system (BWSS).**

**The refugee protection system should be changed to include a refugee claim by spouses without necessarily having one as dependent, but rather both as main applicants (BWSS).**

#### **A.1.4. Lack of connection between Immigration and family law**

The refugee system does not take into account ongoing custody issues in Canadian family court. Thus, there is no link between family law and immigration. Whereas the family law principles are about the best interest of the child(ren), and the maximum contact of the child(ren) with both parents, the refugee protection system is about risk to return to the country of origin or habitual

**We encourage CIC to acknowledge having children born in Canada as an important factor to let women gain status in Canada (BWSS).**

**We would like to see more resources available for women escaping relationship violence in regards to their immigration and refugee rights. We advocate extending legal aid eligibility to every woman who is or is likely to be with no status in Canada. It is especially important for women who have children and are struggling through the family law system (BWSS).**

#### **A.1.5. Refugee Protection System gaps**

The Refugee Protection System has mechanisms to protect women at risk through their Women at Risk Program (AWR). This program is for women who are outside Canada without the normal protection of a family unit who find themselves in precarious situations where the local authorities cannot ensure their safety. This includes women who are experiencing significant difficulties, such as harassment by local authorities or members of their own communities. AWR cases are considered to be either in urgent need of protection or vulnerable and are exempt from the requirement to establish successfully. The Women at Risk Program is a step forward towards recognizing violence against women and attempting to protect vulnerable women and offering safety in Canada. However, it does not protect women who are inland applicants, nor does it protect all women who are in need of protection outside Canada.

**In light of the complexities of the dynamics of abusive relationships, we advocate separate policies within the Refugee Protection System for women who are abused in relationships (BWSS).**

#### **A.1.6. Policy on families coming to Canada in the entrepreneurial category**

This policy needs to be changed to acknowledge that abuse happens. There have been cases where the main applicant, mostly the husband, has gone back to their country after being charged with assault here. The woman has to follow, as she is not the principal applicant.

**In such cases we strongly recommend that women in this category should be eligible to apply and their applications be processed on their merits and ability to sustain a business here in Canada (VLMMFSS).**

#### **A.1.7. Responding to reports of abuse**

**Immigration Canada needs to respond to women when they write to them with the details of the abuse they have endured, hoping that Immigration Canada will strongly consider such information when these abusers/husbands try to sponsor other women into Canada (VLMMFSS).**

#### **A.1.8. Policy pertaining to sponsorship debt**

The Sponsorship Default Recovery Program, which began in April 1999, recovers income assistance payments from people who have defaulted on sponsorship agreements. CIC has assigned their legal rights under the sponsorship agreement and undertaking to the provinces, the right to collect on behalf of the federal government when a default occurs. The provincial government, through Revenue Services of British Columbia, actively seeks repayment of sponsorship default debt.

All social assistance paid the sponsored person or his or her family members becomes a debt owed by the sponsor. As a result, the federal government and the province have a right to take enforcement action. The Minister and the province concerned may choose not to take enforcement action to recover money from the sponsor if the default is the result of abuse or

in other circumstances. The decision not to act at a particular time does not cancel the debt. The Minister and the province concerned may recover the debt when circumstances have changed. What this implies is that as long as a sponsored woman doesn't receive social assistance, her sponsor is not in violation of the undertaking even if he fails to meet her essential needs.

Women who sponsored their spouses or partners but have left the relationship because of abuse are now being pursued through the sponsorship default recovery program. CIC has not responded to requests from some of these women to rescind their sponsorship obligations. Although, the government (Revenue Services of BC) will not seek to recover the debt if there are concerns about the possibility of family violence or abuse, they may seek recovery when circumstances change. Since these women have left the abusive relationship and are no longer in danger, their "circumstances have changed." The government can now seek recovery and collection of sponsorship default debt. Women, especially immigrant and marginalized women, have yet to reach pay equity or job parity and the undue hardship placed on women through the sponsorship recovery default program is overwhelming. Consequently, a woman may stay in an abusive relationship, knowing that if she leaves, and her spouse or partner receives social assistance, she will be responsible for the debt as a sponsor.

**We recommend that considerations be made for relationship abuse in cases of sponsorship debt (BWSS, VLMMFSS).**

#### **A.1.9. Visa waiver and relationship abuse**

When a woman's application is sponsored by a spouse, she asks for an exemption from the immigrant visa requirement. This exemption is called a "visa waiver." Her application will be processed from within Canada provided that she can convince CIC that the marriage is authentic, was contracted in good faith, and that she would face significant hardship if she had to apply from outside Canada. If she leaves her sponsor before CIC has approved a visa waiver, her eligibility to apply as an in-Canada applicant is in jeopardy. She will now have to apply as an independent immigrant based on humanitarian and compassionate grounds. At this point, she is not eligible for a work permit, education permit, or social assistance. Although she can apply for hardship assistance, this could have a negative impact on her application for a visa waiver. Ongoing government financial assistance will affect her eligibility for permanent resident status.

**We recommend that in cases where a sponsored woman is in the process of applying for a visa waiver and her marriage ends because of abuse, that the breakdown of the marriage not adversely affect her visa waiver application.**

#### **A.1.10. Information about women's rights**

A permanent resident or a Canadian citizen can leave an abusive partner and her status in Canada will not be affected. Unfortunately, many women who are permanent residents or Canadian citizens believe that they have no rights and must live with their sponsor. They may

also believe their sponsor's threats to have them deported, even if they are permanent residents.

**We recommend that accessible information about violence in relationships and women's rights be given directly to women at all points of entry into Canada (BWSS).**

## **A.II. BC MINISTRY OF ATTORNEY GENERAL**

### **A.II.1. Measures to protect victim/witnesses**

Immigrant and refugee women may be at increased risk of harassment from extended family members when they testify against their abusers in court, or they may have other safety needs that are different from Canadian-born women.

**Prosecutors should be encouraged to use Bill C-2 provisions to increase the safety of abused immigrant/refugee victim witnesses—e.g. the use of technical aids such as screens in cases where family members are intimidating the victim witness (PGEFS).**

## **A.III. RCMP/MUNICIPAL POLICE**

### **A.III.1. Informational files**

Immigrant and refugee women may face barriers to filing official reports with police.

**There should be the ability to use informational files if need be when reporting to police (PGEFS).**

## **A.IV. MINISTRY OF EMPLOYMENT AND INCOME ASSISTANCE**

### **A.IV.1. Social assistance and immigration status**

If a woman without permanent resident status needs to go on welfare, this will make her inadmissible for permanent resident status under the financial criteria set by the *Immigration and Refugee Protection Act* (IRPA).

For CIC to grant a woman permanent resident status, she has to meet the financial, medical, and criminal record requirements set by the *IRPA*. This means she will be evaluated on her capacity to establish herself in Canada without relying on social assistance. Many sponsored women do not speak English, have never officially worked, have not been able to accumulate any savings, or have young children to look after. Compounded with the stresses and vulnerabilities that leaving a violent relationship entail, it is often impossible for them to convince CIC that they are financially self-sufficient and/or a good candidate for landed status (BWSS).

**Women should be able to access social assistance without becoming inadmissible for permanent residence status (as is currently the case under the financial criteria set by the *Immigration and Refugee Protection Act* (IRPA)).**

Many sponsored women with permanent resident status believe they have no right to social assistance. The message imparted by the Sponsorship Agreement document is that sponsored women should not apply for social assistance/welfare benefits. Social assistance policies have always been under provincial jurisdiction and vary according to provincial regulations. The fact that there are special rules applying to sponsored persons reinforces the general perception that sponsored women are not really entitled to social assistance.

**Steps should be taken to ensure that women with permanent resident status know that they have the right to social assistance.**

#### **A.IV.2. Policy regarding three-week work search exemption**

This policy states that a woman who has left an abusive relationship is exempted from doing a work search. In reality our experience is that different MEIA offices have different interpretation of this policy. This policy does not include multiple barriers that immigrant women face in their job search, nor does it include women who decide not to go to transition houses.

**The definition of victim of violence needs to be re-defined with immigrant/refugee women in mind and there needs to be a consistent application of the policy amongst all MEIA offices (VLMMFSS).**

#### **A.IV.3. Policy regarding exemption of income**

In many situations when women leave abusive relationships they experience disruption in receiving the Canadian Child Tax Benefit for several reasons. The women in such circumstances have to inform Canada Customs & Revenue Agency. In situations where there is a language barrier it takes few days or weeks to be able to achieve this and they may lose the money to the abuser.

**The policy of exemption of income should also include child tax benefits lump sum payments received by women from Revenue Canada (VLMMFSS).**

Many women have experienced losing substantial amounts of money in dissolving Registered Education Savings plan accounts as the administrative fees are deducted before the women receive any balance. And if this account is in the name of both parents, Ministry of Employment and Income Assistance puts pressure and onus on the women to contact their abusers and obtain the spouse's signatures to close these accounts. We are aware that due to the cuts to the legal aid funding, Legal Services now does not cover the division of assets. Many women have no ability to pay lawyers privately or represent themselves in the judicial system due to barriers such as cultural, linguistic and inability to comprehend the legal system.

**The exemption policy needs to also include Registered Education Savings Plans (VLMMFSS).**

#### **A.IV.4. Policy for providing evidence of rental payments**

MEIA has a mandatory practice where they ask recipients to provide rental receipts and/or have Intent to Rent forms completed by the landlords. This policy should recognize that there is a shortage of subsidized housing. Landlords, at times, are not reporting rental incomes to Revenue Canada and are reluctant to provide such forms. In many cases women do not want their landlords to know that they are applying for or receiving Income Assistance in case the landlord refuses to rent to them. Many women have to wait for years before they become eligible for subsidized housing and in the meantime they usually try to rent apartments or basement suites.

**MEIA should accept a written statement signed (or maybe notarized) by the women confirming the amount she is paying for rent (VLMMFSS).**

#### **A.IV.5. Assistance for women without immigration status**

These women may have come to Canada on visitor visas, or been brought as mail order brides or as live-in caregivers, etc. If sponsored, in many situations women have experienced withdrawal of their sponsorship after they break or leave the relationship. In such situations both Immigration Canada and MEIA need to acknowledge that these women are in need of assistance, keeping in mind that they were brought here either by Canadian citizens and/or permanent residents (VLMMFSS).

**In cases where women have received approval from CIC in the form of a Letter of Principle, their cases need to be processed on their own merits (VLMMFSS).**

**We also recommend that MEIA reinstate hardship assistance for women who have no immigration status but are in the process of applying with Immigration Canada (VLMMFSS).**

#### **A.IV.6. Childcare subsidies for refugee applicants**

In most cases, applicants have work permits from Immigration Canada, and do become successful in finding employment. As they do not qualify for childcare and daycare subsidies they are unable to work, a criteria necessary for their immigration application.

**MEIA needs to designate refugee applicants as eligible to receive childcare/daycare subsidies (VLMMFSS).**

#### **A.IV.7. Ministry contact with abusive sponsor**

Part 8.10 of the *BC Employment and Assistance Manual* (Hardship Assistance - Sponsorship Undertaking Default) sets out the policy, eligibility criteria, and procedures for issuing social assistance to sponsored women. Although the policy stipulates, “where there are any concerns about possible abuse, no contact is to be made with the sponsor, including by letter,” financial workers often do not believe the women and/or minimize the abuse. Not only do financial workers undermine their own policy and protocol in this case, but they also endanger women’s lives.

**MEIA should ensure that all staff should adhere to the MEIA policy that prohibits workers from contacting sponsors if abuse is even suspected (BWSS).**

## **A.V. MINISTRY RESPONSIBLE FOR HOUSING**

### **A.V.1. Eligibility for subsidized housing**

The policy states that if the housing applicant has been sponsored and there is a breakdown in sponsorship, that he/she is not eligible to apply.

**The subsidized housing organizations need to change and/or be flexible with their policy and/or legislation for eligibility criteria. This policy needs to acknowledge that there are many women and children who are victims of violent crime and have to leave the abuser, mostly the sponsor (VLMMFSS).**

### **A.V.2. Housing for single/older women**

Many elderly people, especially older women, experience violence from their adult children who have sponsored them.

**The housing societies need to include single, visitor women as eligible for subsidized housing. At present, we are not aware of any single housing society that accepts this group of women (VLMMFSS).**

### **A.V.3. The need for more co-op housing**

**The federal government needs to subsidize more co-op housing for low-income earners, especially women leaving abusive relationships (VLMMFSS).**

### **A.V.4. Cultural sensitivity in housing**

It is a common practice in North American culture for nuclear families to have one bedroom per person in the family. On the other hand it is a common practice in some communities, with or without extended families, to share their space and live with a communal spirit, and each member may not be required to have his or her own bedroom.

**Housing policies need to reflect trends in our society: our society is becoming more and more diverse, with people from various different ethnic origins. There is a need for greater sensitivity towards different cultures and an increase in the availability of senior housing and assisted living complexes (VLMMFSS).**

## **A.VI LEGAL SERVICES SOCIETY**

### **A.VI.1 Refugee claims and women dependents**

When a family unit makes a refugee claim, there is a principal applicant, and the spouse and children are dependants. If there is a breakdown of the marriage, there is no policy that automatically takes the dependant out of the claim. The main applicant can choose to keep her or leave her out. Also, lawyers representing the family unit decide to either take the

dependants out or to withdraw from the whole case, as it creates conflict of interest for the lawyer to represent them.

Women in this situation rely heavily on proper legal advice, and legal advice, resources and legal representation are often either expensive or scattered. We often find that women in abusive relationships receive information through their abusers, as abusers work very hard in isolating women from their family, friends and community. Thus, women may not know what legal resources are available in the community.

#### **A.VI.2. Lack of connection between Immigration and family law**

The refugee system does not take into account ongoing custody issues in Canadian family court. Thus, there is no link between family law and immigration. Whereas the family law principles are about the best interest of the child(ren), and the maximum contact of the child(ren) with both parents, the refugee protection system is about risk to return to the country of origin or habitual residence.

**We would like to see more resources available for women escaping relationship violence in regards to their immigration and refugee rights. We advocate extending legal aid eligibility to every woman who is or is likely to be with no status in Canada. It is especially important for women who have children and are struggling through the family law system (BWSS).**

#### **A.VI.3 . Information about women's rights**

A permanent resident or a Canadian citizen can leave an abusive partner and her status in Canada will not be affected. Unfortunately, many women who are permanent residents or Canadian citizens believe that they have no rights and must live with their sponsor. They may also believe their sponsor's threats to have them deported, even if they are permanent residents.

**We recommend that accessible information about violence in relationships and women's rights be given directly to women at all points of entry into Canada (BWSS).**

### **A.VII REVENUE SERVICES OF BC**

#### **A.VII.1 Sponsorship Debt Collection**

The Sponsorship Default Recovery Program, which began in April 1999, recovers income assistance payments from people who have defaulted on sponsorship agreements. CIC has assigned their legal rights under the sponsorship agreement and undertaking to the provinces, the right to collect on behalf of the federal government when a default occurs. The provincial government, through Revenue Services of British Columbia, actively seeks repayment of sponsorship default debt.

All social assistance paid the sponsored person or his or her family members becomes a debt owed by the sponsor. As a result, the federal government and the province have a right to take enforcement action. The Minister and the province concerned may choose not to take

enforcement action to recover money from the sponsor if the default is the result of abuse or in other circumstances. The decision not to act at a particular time does not cancel the debt. The Minister and the province concerned may recover the debt when circumstances have changed. What this implies is that as long as a sponsored woman doesn't receive social assistance, her sponsor is not in violation of the undertaking even if he fails to meet her essential needs.

Women who sponsored their spouses or partners but have left the relationship because of abuse are now being pursued through the sponsorship default recovery program. CIC has not responded to requests from some of these women to rescind their sponsorship obligations. Although, the government (Revenue Services of BC) will not seek to recover the debt if there are concerns about the possibility of family violence or abuse, they may seek recovery when circumstances change. Since these women have left the abusive relationship and are no longer in danger, their "circumstances have changed." The government can now seek recovery and collection of sponsorship default debt. Women, especially immigrant and marginalized women, have yet to reach pay equity or job parity and the undue hardship placed on women through the sponsorship recovery default program is overwhelming. Consequently, a woman may stay in an abusive relationship, knowing that if she leaves, and her spouse or partner receives social assistance, she will be responsible for the debt as a sponsor.

**We recommend that considerations be made for relationship abuse in cases of sponsorship debt (BWSS, VLMMFSS).**

## **B. PRINCIPLES OF EFFECTIVE RESPONSE**

The submissions we received highlighted some principles of effective response. These included:

1. Responders should take a holistic approach to understanding the complexities of women's lives, taking as many factors as possible into account. They should recognize the impacts of and links between immigration, violence, poverty, racism and custody issues.
2. A consistent definition of abuse should be used by all those who respond to women who have experienced abuse. The definition should include verbal abuse and threats.
3. Policies of provincial and federal departments and ministries should be complementary and not conflicting.
4. Policies should be applied consistently by all personnel.
5. Immigrant and refugee women should be consulted in all policy development that relates to this issue. This allows for a process that is transparent and inclusive.
6. All professionals who work in the area of supporting women experiencing violence should receive ongoing training about immigrant, refugee and visitor women and their experience of and response to services provided to them.
7. Services should be coordinated and work in collaboration.
8. Women should have access to literature and resources in their own language.
9. Women's concerns or complaints about appointed interpreters or translators should be taken seriously and acted upon.
10. There should be respectful responses and efficient follow-ups and referrals.

## APPENDIX: CONSULTATION INVITE

- Community Coordination for Women's Safety (CCWS) focuses on improving coordination on violence against women and the local, regional and provincial levels; our priorities are rural and isolated communities, and women who face particular discrimination. CCWS is a program of the BC Association of Specialized Victim Assistance and Counselling Programs.
- Since the start of the program in 2001, we have used a number of approaches to encourage coordination and action on violence against immigrant, refugee and visitor women. This has included support for local coordination initiatives to address violence against immigrant, refugee and visitor women, as well as exploration of changes that are needed beyond the local level.
- We have had some indications of interest from Immigration Canada to work together and are exploring some possibilities such as a protocol for coordination between the Immigration Board, Criminal Justice Branch and others.
- In 2003 we brought together a group of immigrant women of colour who work as front-line advocates with immigrant, refugee and visitor women. The purpose of the meeting was to provide an opportunity for connection and support between these advocates, as well as to get feedback on key issues arising in their work. A summary of the key issues from that focus group was presented to our provincial Working Group. This provincial level coordination initiative is made up of senior police and RCMP members, provincial and federal justice officials, major provincial non-profit organizations and members of the civil and criminal bar. It also includes members who represent women with disabilities, Aboriginal women and immigrant, refugee and visitor women. Working Group members provide technical expertise and liaison between their sector and the project. Specific local or regional concerns that have broader implications are also considered by the Working Group. At the following meeting, members of the Working Group spent some time working on action plans for the identified issues. The Working Group members identified some key action areas but at the same time identified the gap in their knowledge about the specifics of **policies** that are causing barriers to immigrant, refugee and visitor women experiencing violence.

### CURRENT PROJECT

Our next step is to consult with you and other experts who are keenly aware of specific **policy provisions** that are impeding safety of immigrant, refugee and visitor women experiencing violence. We are seeking this input from the Philippine Women's Center, Vancouver and Lower Mainland Multicultural Family Support Services, MOSAIC, Battered Women's Support Services and Kamaljit Lehal, immigration lawyer.

## What will we do with this information?

At this point our plan is to submit the information collected to our Working Group. This isn't to suggest that we will be able to address all of these policies, or that others are not working to address these policies. We are seeking this information because we do have some authorities at our provincial Working Group table, and others who have expressed interest in collaborating, so we would like to use the opportunity to create action on these barriers if possible.

## Contract specifics:

You and many other experts have articulated lists of problems in the past; this is not what we are looking for. We would like to contract with you to provide a written articulation of **specific federal and/or provincial policy provisions that create barriers for immigrant, refugee and visitor women who are experiencing violence in relationships and sexual violence**. These may include policies of Immigration Canada, Ministry for Children and Families, Ministry of Employment and Income Assistance, Ministry of Attorney General, Ministry of Public Safety and Solicitor General, RCMP and Municipal Police. The policy provisions may relate to issues such as, but not limited to, violence against mail order brides, sponsorship debt collection, violence against live-in caregivers, or the use of protective conditions by Immigration. The problems you identify may relate to the wording of policies or the implementation or lack thereof. If your time allows, we would also like your opinion about policies that may need to be developed.

Please consider the impact of these policies on immigrant/refugee/visitor women who are lesbian or transgendered or who have disabilities, or who experience other additional layers of oppression.

We are aware that a complete list of these problematic policies would be quite lengthy. We are not asking you for an exhaustive list; we are seeking your expert opinion on the **top 5 - 10 problematic policy provisions**. For each policy provision we would like the following information:

1. What is the problematic policy provision?\*
2. Why is it problematic? I.e. does not consider immigrant women or is not being put into practice.
3. What is your recommended change?
4. What would the change accomplish?

\*Name(s) of particular contacts for that department if you are aware of any.