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Access to Identification for Low-Income Manitobans

By Ellen Smirl

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About the Author

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Executive Summary

Government-issued identification (ID) is essential to gain access to a wide range of government entitlements, commercial services and financial systems. Lack of ID on the other hand, represents a critical barrier that prevents low-income Manitobans from accessing these services and benefits, and ultimately results in further marginalization and deepening poverty. While the demand to authenticate our identities has increased, supports to help those who face barriers in accessing ID have not kept pace.

Given that ID is necessary for stability and full participation in society, addressing the issue of lack of access represents a larger commitment to reducing poverty and social exclusion in Manitoba. Supporting Employment and Economic Development (SEED) Winnipeg, a non-profit organization dedicated to building strong communities through financial empowerment programs and services, gained first-hand insight into this issue while working on a project to support participants to open Registered Education Savings Plans (RESPs) and access the Canada Learning Bond (CLB) for their children. It quickly became evident that a lack of necessary ID prevented many low-income participants from taking advantage of these financial

programs. Further, examination of statistics from SEED Winnipeg's ID Fund indicated that Indigenous participants make up a high proportion of program participants. Emerging out of these insights, this report details the scale of this issue and identifies opportunities for improvement that can play a role in ensuring that all Manitobans have access to the basic ID they need to become full participants in our society and move out of poverty.

Through consultation with both community organizations working directly and indirectly on this issue, as well as government agencies responsible for ID provision, this report identifies four opportunities for improvement to reduce the barriers to ID for low-income Manitobans:

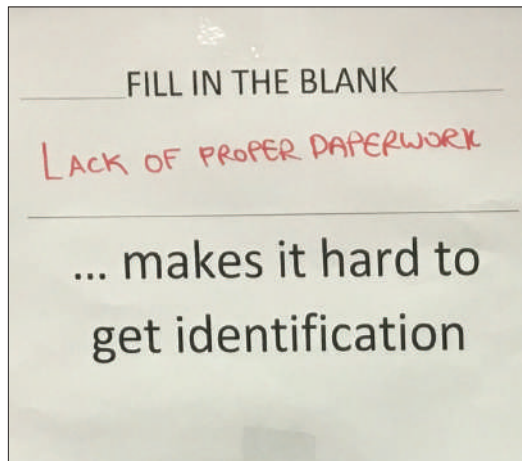
1. A fee waiver that enables low-income Manitobans to obtain or replace a birth certificate for free.
2. Access for individuals leaving prison, and youth exiting CFS, to obtain government-issued ID prior to leaving.
3. The creation of an ID storage facility in Winnipeg.
4. Expansion of the MPI guarantor list (used to issue photo-ID) to include professionals

that low-income and/or marginalized populations are more likely to have contact with.

In addition to these strategic reforms, areas of concerns were identified relating to ID access and provision in Manitoba. These areas of concern have been identified as next steps. These next steps include: greater support for those experiencing difficulties navigating ID systems including training for frontline staff in a trauma-informed care lens; and providing greater

support to new parents during the registration process when children are born.

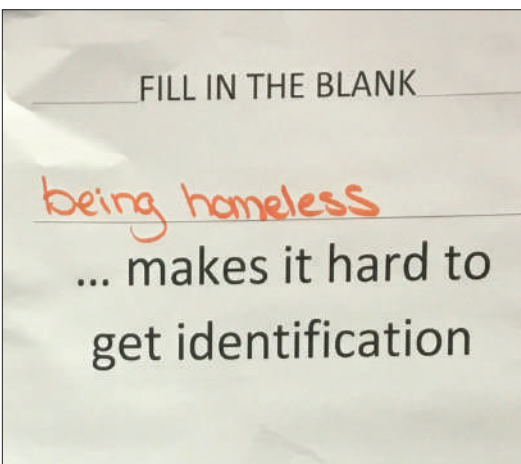
Implementing the above reforms and further investigating next steps would help to support vulnerable Manitobans in accessing the benefits, supports and services to which they are entitled, as well as increased opportunities for greater inclusion; economic advancement and financial stability for these individuals. As ID is a critical tool in the fight against poverty, reducing barriers must be understood as part of this larger effort.



Background

This research examines the barriers that low-income and other marginalized individuals face when trying to access ID. SEED Winnipeg gained first-hand knowledge about the barriers that individuals face in accessing ID through delivering their ID Fund, which was established in response to the high-demand for ID support services in other programming efforts. Given that ID is necessary for stability and full participation in society, addressing the

issue of lack of access represents a larger commitment to reducing poverty and social exclusion in Manitoba. Thus it became clear that larger systems and policy change was needed. SEED Winnipeg approached CCPA-MB to do research on the existing policy framework; identify lessons from other jurisdictions; and investigate opportunities to improve access to identification by low-income community members in Manitoba.



Methodology

Goals of Project

The goal of this research is to investigate and document current mechanisms in place to access ID, particularly for people facing barriers. Through key informant interviews, it establishes the scope of the challenge posed by a lack of access to identification as well as some of the common and complex challenges facing people who do not have identification. Thirdly, it clarifies some of the social and economic impacts faced by low-income Manitobans when they are not able to access ID. Finally, this report identifies where potential opportunities exist to build in access points to identification within existing public systems.

Methods

Initial investigation involved the examination of current literature on access to identification for low-income people who face multiple barriers. This included a review of literature, secondary sources, provincial government legislation and policies, and a review of other jurisdictions' policies and approaches to providing ID. Additionally, the literature review documented the roles and responsibilities of government agencies regarding access to identification.

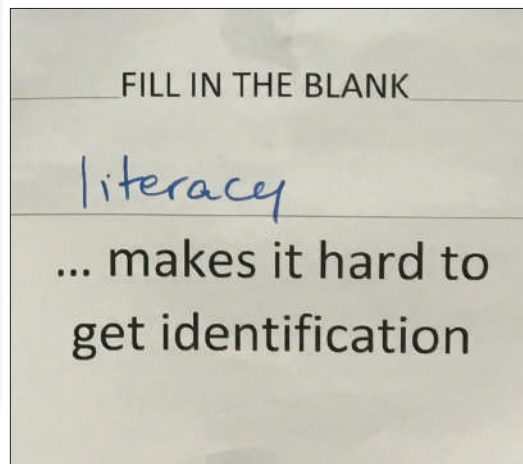
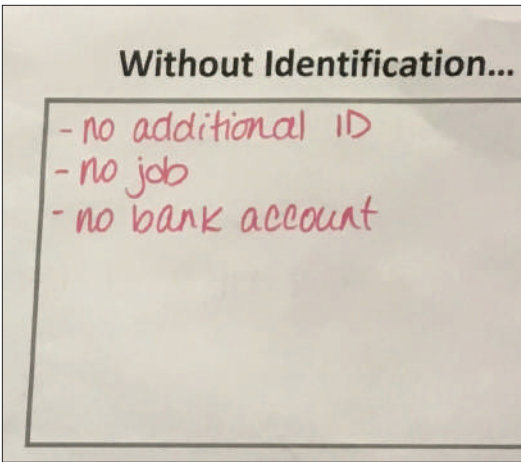
The scope and complexity of the challenge was identified through interviews with staff of agencies that provide access to ID or work with community members that face barriers to obtaining ID. These include Citizens' Bridge, SEED Winnipeg, the Winnipeg Boldness Project, Ndinawe, Siloam Mission, the Low-Income Intermediary Project, and Assiniboine Credit Union. Participant selection was targeted with participants chosen based on their interaction on the issue. SEED Winnipeg initially identified organizations that they work with on this issue, who were then contacted and asked to participate in the research. Additional snowball sampling was conducted with subsequent key informant participants. Snowball sampling has worked well as a research sampling technique.¹ Since we were not working with marginalized participants but rather staff of the organizations who work with the participants, confidentiality was not determined to be an issue.

As a means to better understand what other jurisdictions are doing to address the issue of ID access, five paper surveys were sent out to community and government organizations in Alberta where a more cohesive and comprehensive governmental response has emerged. These

interviews were then analysed to identify common themes and observations.

Key informant interviews were conducted with representatives from five different government agencies and arms-length organizations with potential roles to play in improving access to ID (MPI, Manitoba Health, WRHA, Employment and Income Assistance, Alberta Health Services). The goal of these interviews was to identify opportunities for building in access points to identification within these systems.

For the purpose of this project, measuring the economic costs of not providing identification was understood as part of a larger preventative strategy versus a reactionary one (e.g. the costs of housing an individual versus the cost accrued by a homeless individual). While it is difficult to measure the economic costs of not having ID, we can understand the economic costs as part of a larger societal cost if missed opportunities occur as a result of not having ID.



Roles and Responsibilities of ID Provision

Identification (ID) in Canada falls under either federal or provincial jurisdiction, and responsibility for ID provision is housed within several government agencies. Each agency is governed in their responsibilities by various legislation.

Birth Certificates

Birth certificates in Canada fall under provincial responsibility. Each province has its own Vital Statistics Agency that records, administers and issues records relating to vital statistics such as births, deaths, marriages, and name changes. In Manitoba, the Vital Statistics Agency is “responsible for administering and enforcing *The Vital Statistics Act*, *The Marriage Act*, *The Change of Name Act* and processing disinterments under *The Public Health Act*”.²

In Manitoba, it costs \$30 to apply for a birth certificate through the Vital Statistics Agency.³ According to the Agency, this cost cannot be subsidized because the Agency is designated as a Special Operating Agency (SOA) by regulation under *The Special Operating Agencies Financing Authority Act*.⁴ When asked about fee waivers for birth certificates, the Manitoba Vital Statistics Agency stated that they must recover all oper-

ating costs and is not in a financial position to waive fees.⁵ Other provincial Vital Statistics offices (also SOAs) do waive fees relating to exceptional circumstances such as natural disasters (British Columbia and Alberta)⁶ or homelessness (financial constraints) (Ontario)⁷.

Social Insurance Number

The Social Insurance Number (SIN) is a nine-digit number assigned to each individual Canadian, permanent resident or temporary resident. While the SIN card was never intended to be used as an identity card because it contains neither security feature nor identifying attributes⁸ it is required in order to work in Canada; file taxes; and have access to programs and benefits. Primary documents in their original form (photocopies are not accepted) are required to apply. For Canadians born in Canada the primary document required is the birth certificate issued in the province or territory of birth.⁹ Applications must typically be completed in person at a Service Canada location; however, people who live further than 100km from the nearest Service Canada location can apply by mail. There is no cost to apply. As of 2014, the issuance of SIN

cards has switched from the old plastic card to a new paper format.

Photo ID in Manitoba

Photo Identification (non-drivers photo ID) issued by Manitoba Public Insurance (MPI) costs \$20 (\$10 to replace it if lost); however, in certain cases the fee may be waived.¹⁰ Original supporting documents are required to establish identity and must be applied for in person.¹¹ If unable to provide acceptable documents to authenticate identification, Manitoba Public Insurance may accept a completed Guarantor Declaration instead. Guarantors must be Canadian citizens residing in Canada; have known the applicant for a minimum of two years; and meet the occupation or offices criteria exactly as described (see Appendix A for complete list of occupations that meet the criteria for Guarantor). Legislation pertaining to Identification Cards can be found in the *The Drivers and Vehicles Act*.¹² In exceptional cases, MPI may accept an alternate guarantor such as a social worker, or a guarantor who has not known the applicant for two years.¹³

Manitoba Health Card

The Manitoba Health Card (Registration Certificate) is a paper card issued by Manitoba Health to all Manitoba residents that entitles persons named on the card to health benefits. While this card must be presented whenever seeking health services, it is not considered valid government-issued ID. Some agencies providing services still accept the card as ID (when the burden of authentication is low) or as proof of residency.

Registration for a Manitoba Health Card for those born in Manitoba generally happens at

the hospital where the child is born. For those who are not registered at birth, or who move to Manitoba from another province or country, the birth certificate (original or copy) or passport is accepted as authentication for identity.¹⁴ For replacement cards and address changes, the insured individual must phone Manitoba Health, who will mail out a new copy. Eligibility for health coverage falls under the *Health Services Insurance Act* and Regulations.¹⁵

Secure Certificate of Indian Status

The Secure Certificate of Indian Status (SCIS, commonly referred to as a Status Card) is an identity document issued by Indian and Northern Affairs Canada (INAC), which confirms the cardholder is registered as a “Status Indian” under the *Indian Act*. This card facilitates access to “services and benefits administered by federal and provincial governments and other private sector program and service providers.”¹⁶ In order to apply for the SCIS card, the applicant must provide an original proof of birth document; two passport-style photographs; valid identification; a completed application form; and name-linking documents (if required).¹⁷ While there is no cost to apply for the SCIS, applicants must pay the fees associated with the documents required for application (e.g. birth certificate, marriage certificate, passport etc). Following protests at the Manitoba INAC offices in April 2016, the Winnipeg office was closed to the public with applications required to go through the mail, however at the time of writing the office has reopened on an appointment only basis. Original documents must be provided and applications can take up to 3 months to process.¹⁸ Original documents are returned in the mail via regular post.¹⁹

Common and Complex Challenges of Accessing ID

Systems of identification are deeply rooted in the modern world. The broader and more recent trend towards intensified surveillance that has catalysed post 9/11 brings with it challenges for both civil liberties and human rights.²⁰ If implemented improperly, a host of problems can arise including failure of systems, unforeseen financial costs, increased security threats and unacceptable imposition on citizens.²¹ Success of identity systems on the other hand, depends on a cooperative approach that involves all key stakeholder groups and includes regular review of management practices and independent risk assessment.²²

Despite the universality of ID cards in most countries, the impact of these cards are not felt the same by everyone. Many people live on the right side of what has been conceptualized as the 'ID Divide'.²³ That is to say, they carry at least one government-issued ID with them wherever they go. If these individuals lose ID, they may be inconvenienced by the time lost waiting in line at Driver's Licensing or Vital Statistics. However, because they have the financial resources, knowledge of their familial lineage, and the ability to fill in forms and navigate systems effectively, the loss of ID may be more or less just

an inconvenience. But for those who exist on the other side of this divide and do not possess the social and financial capital necessary to navigate these systems, their ability to fully participate in social, political, and economic life is severely compromised.

Even if ID cards are not mandatory, it is increasingly difficult to gain access to a range of government entitlements, commercial services and financial systems without them, which makes ID cards a *de facto* necessity. For example, legislation requires banks to verify new clients with a minimum of two pieces of ID,²⁴ and it remains difficult to function in modern society without a bank account. This raises the question that if ID is required to access government benefits as well as commercial and financial services, who then becomes responsible to pay for the cost of ID for those who cannot afford it as well as to support those who cannot navigate the systems through which ID is issued?

Another important aspect of the ID divide is the inability of those without ID to file taxes, as well as to access benefits and programming that are tied to tax filing. Tax filing support can be part of an important anti-poverty strategy and health interventions.²⁵ By filing taxes, indi-

viduals can access child benefits, the GST/HST credit, and the working income tax benefit as well as provincial prescription drug coverage which is determined based on previous years' tax-filings.²⁶ All of these important supports cannot be accessed if the individual is unable to file taxes. Filing taxes requires a SIN however, a document in turn which requires an 'original primary proof document' such as birth certificate (please see above *Social Insurance Number* for more information on the SIN).²⁷

Findings From Interviews

Interviews were conducted with community agencies that work directly with those struggling to access ID as a means to gain greater understanding of whom this issue impacts and what the impacts of lack of ID may be. It was found during consultation that by far, Indigenous community members are more deeply impacted by this issue than non-Indigenous. Of the 476 ID applications that SEED processed between September 1 2015 and August 31 2016, 81 percent of the applicants identified as Indigenous. Many of those who sought support in applying for ID came from economically disadvantaged areas. Homeless and precariously housed individuals; those who are exiting prison; at-risk youth; and refugees also face challenges, some of which are very specific to their circumstances. Unsurprisingly, it was also reported that individuals sought ID in order to gain access to government benefits as well as commercial and financial services. According to key informants, the cost of applying for ID was identified by their clients as the most significant barrier by a wide margin. However, navigating complex forms, literacy and language barriers, lack of transportation, and lack of knowledge regarding familial lineage were also cited as barriers. The following section describes in greater detail the findings from consultation with community and governmental agencies.

Reasons for Getting ID

ID is required to access a myriad of services and benefits. Some of the reasons (reported by staff supporting clients) for ID applications included needing to access services and benefits such as health care, income assistance, employment insurance, old age security as well as to file taxes or open a bank account. Also frequently mentioned were accessing social housing or to rent an apartment, to vote, as well as for employment (SIN is required for employment or in the case of a criminal record check needing to be conducted). Additionally, parents reported needing ID for their children to open a Registered Education Savings Plan (RESP) in anticipation of accessing the Canada Learning Bond (CLB).

Barriers and Supports in Accessing ID

Research suggests that many people struggle to fulfil identification requirements, especially for those living in poverty, those with psychiatric disabilities, substance use issues, prisoners or other institutionalized populations, victims of natural disasters, the elderly, children, as well as the homeless or precariously housed.²⁸

Over and over again, the biggest barrier cited by key informants (working with clients applying for ID) as restricting access to ID was cost. In Manitoba, it costs \$30 to apply for a birth certificate through the Vital Statistics Agency.²⁹ The Vital Statistics Agency does not waive fees.³⁰ Respondents expressed concerns that there is a lack of formal supports as well as a lack of trauma-informed practices in place with Vital Statistics for those who struggle to access the required information or documentation.³¹

Encouragingly, MPI has made considerable efforts to reducing barriers for low-income and marginalized Manitobans who may struggle to access photo ID. The Manitoba Identification Card issued by Manitoba Public Insurance (MPI) costs \$20; however, in certain cases the fee may be waived.³² MPI has designated its service cen-

tre at 1284 Main Street as the location where individuals who face greater barriers in fulfilling requirements to access ID can be sent by community agencies. Staff at 1284 Main Street has been trained about fee waivers and exceptional circumstances regarding inability to produce certain documents; however, they have not been officially trained in trauma-informed practices.³³

Key informants did note that centralizing community referrals to one location places additional burdens on community members to firstly, know about that location or be referred to it by a community agency worker, and secondly, travel to that location rather than another location that would be more convenient. A social worker at Siloam Mission noted:

“our folks get...a run around to this agency... [to that]...agency. It gets very discouraging and [they] just give up.”

Participant experiences reported through key informants also indicated that there remains a training gap about the fee waiver amongst MPI front-line staff. This results in the burden to educate individuals falling to community organizations. It remains important to note however, that key informants remain encouraged by the level of engagement and commitment to this issue by MPI.

Employment and Income Assistance (EIA), the provincial agency that provides financial assistance to low-income Manitobans, has also made important contributions in supporting low-income Manitobans to access ID. While ID is needed to apply for social assistance benefits, EIA indicated that they are willing to work with clients who do not have ID upon intake to ensure that no Manitoban is unable to access assistance due to lack of ID. Employment and Income Assistance (EIA) will cover the costs of applying for a birth certificate or other ID for clients as a ‘special need’.³⁴ There is no fixed rule as to how often the cost of replacement ID can be covered but rather is left up to the discretion of the work-

er.³⁵ These supports are crucial for low-income Manitobans. Key informants indicated however that EIA clients are sometimes required to foot the cost up front. In addition, EIA workers frequently send their clients to SEED to help these individuals with the application process; while staff at SEED are well versed in ID applications and provide a supportive environment to assist these clients, SEED noted that this situation creates an additional barrier for EIA clients, who have to make another appointment and travel to SEED’s location. Additionally, SEED struggles with finding the capacity to meet the demand for their existing programming.

The above policies and their implementation highlight the paradox that has been observed through social services provisioning.³⁶ That is, while discretion remains a critical component of the work that front line staff do, these workers often lack the time, information, and other resources required to respond effectively to each individual case.³⁷

Another oft-cited reason as a major barrier to accessing ID was the common, and often frustrating, refrain that you ‘need ID to get ID’. In order to obtain photo ID, other forms of ID must be procured, most of which require a birth certificate.³⁸ In the case of a birth certificate, as it represents a foundational document, no other ID is required, however extensive knowledge about familial lineage, place and date of birth is required. During conversations with staff at SEED and Citizens’ Bridge it was reported that due to familial breakdown some clients struggled to get accurate information.

Interviews with key informants revealed that aside from cost and lack of ID required to procure additional ID, other barriers exist. Support in navigating the forms was required due to literacy or language constraints, lack of awareness of the process, and lack of transportation to and from the location of application. Key informants indicated that increased supports for those who face these barriers are required. Additionally, In-

digenous children who were apprehended into the child welfare system face especially complex challenges in navigating the application process (see section below *ID and The Ongoing Impacts of Colonization*).

It was reported during consultation with community organizations, that those who remain un-housed or precariously housed tend to lose their ID more frequently. Key informants reported that those who are homeless or precariously housed, are at a higher risk of victimization, and are more likely to be robbed of their belongings.³⁹ When individuals are transient or homeless, they carry their ID on their person, which increases the likelihood of these documents being stolen or lost. Transience also creates additional barriers to replacing ID, as ID is usually mailed to a home address. A lack of secure ID storage was mentioned frequently by some community organization staff as contributing to the frequency that some individuals lose their ID.

ID and the Ongoing Impacts of Colonization
An additional issue raised during this research requires particular attention. As a result of the Sixties-Eighties Scoop⁴⁰ many children taken from their homes by the government face especially high barriers to accessing ID. In order to obtain a birth certificate, an applicant must recall and provide information about their birth and parental lineage as it is stated on their birth registration. Many Indigenous communities however have been disconnected from their family histories, both through the physical removal of Indigenous children from their families as well as through the erasure of Indigenous cultural identities and histories, including family names, and their replacement with colonial conceptions.⁴¹ Barriers facing this group include lacking the familial knowledge required to fill in the forms as well as instances of adoption records being lost or misplaced, leaving these individuals in a procedural loophole. In some instances, survivors

of the Scoop have been told by Vital Statistics that they do not exist or that their birth records were destroyed in a fire.⁴² Insufficient formal support for individuals facing multiple barriers in accessing ID has resulted in organizations like SEED and Citizens' Bridge being overwhelmed with the demand for intensive navigation supports and funds to cover the cost of ID.

In other instances, staff working with individuals applying for ID through their programs reported that familial breakup, or intergenerational traumas led to additional distress for individuals trying to procure the required information to access birth certificates. In one instance, SEED staff noted that it took her client six months and six different applications to come up with the correct name of her father on her birth registration:

“I know there’s a woman that both parents are deceased...and she was raised by her grandparents that...both ended up being deceased and she had an aunt that kept feeding her information on who her dad might be. And he was on the birth certificate and she was giving wrong information. We probably tried six times on the course of half of [a] year and wrote a letter together and submitted it to the director [of Vital Statistics], and she ended up calling multiple times after submitting that letter and they ended up releasing the birth certificate to her. It took a fair amount of effort...”

Staff at SEED indicated that many Indigenous participants face barriers to obtaining ID that derive from the ongoing legacy of colonialism. Some participants seeking ID do not trust government because of past broken promises relating to treaties and are reticent to sign government documents or deal with governmental agencies. Some participants struggled in finding out familial histories, while some were required to speak with family members from whom they were estranged to gather information they required to apply for birth certificates. SEED’s experiences

suggests that Indigenous community members are more likely to require support to obtain basic identification and moreover, that many Indigenous community members face additional barriers that limit access to ID.

The barriers that Indigenous peoples encounter in applying for ID have very real implications for their participation in society. While little research of the impact of lack of ID for Indigenous groups has taken place in Canada, research in the U.S. indicated that in the five counties in South Dakota with the highest Native-American populations, voters in the 2004 primary were two-to-eight times more likely not to bring ID to the polls than other voters in the state.⁴³ In 2015, one community activist in Kenora, ON ran ID clinics to help Indigenous community members access ID in order to vote.⁴⁴ As marginalized populations are less likely to have multiple and valid pieces of ID, attempts to undermine their political participation through voter suppression strategies can be highly effective and have been well documented in the United States.⁴⁵

Refugees

While the numbers of refugees seeking support from SEED to obtain ID remains low, issues surrounding the barriers that refugees face when trying to access ID were raised. Staff at SEED Winnipeg reported that some refugees⁴⁶ struggle to overcome mental health issues that may be related to both traumatic events in their home countries as well as the stress of adapting to a new culture and systems. Physical health was also noted as sometimes posing challenges to getting to appropriate locations to apply for ID while some refugees have a fear of authorities cultivated in their home countries resulting in reticence to engage in governmental systems in Canada. Key informants additionally noted that refugees struggle with a lack of access to financial resources to pay for application fees, lack of support to navigate the system and many find the

process overwhelming. Further observations by staff at SEED includes that while primary ID is generally attained quickly upon arrival in Canada, it is not uncommon for this ID to have errors (e.g. spelling or order of names, birth dates), which can be costly and complicated to correct. Lower literacy and language barriers were reported as representing additional struggles.

SEED staff reported that further difficulties faced by refugees include that the 'Record of Landing' is not accepted as proof of residency by MPI, which creates difficulties for new Manitobans trying to establish their residency and acquire photo ID. Access to guarantors that have known the applicant for two years is nearly impossible for recent arrivals. Additionally, while some newcomer organizations will support ID applications, key informants indicated that very few organizations have funding to help clients pay for the ID.

Incarceration

Individuals exiting correctional facilities were also noted during the interviews as facing greater barriers in accessing ID. Citizens' Bridge, who works with inmates to procure identification before they are released, noted that it is very common that inmates' ID are lost when being admitted into prison, or their partners destroyed it during their stay in the facility.

There are a number of challenges that people exiting correctional facilities face: securing employment, housing, re-establishing social connections and support. ID is often a requirement for supports and services. Lack of access to needed services and supports can result in a higher risk of experiencing poverty, abuse, addictions, and recidivism.⁴⁷ In a study conducted in the United States, it was found that for offenders with mental illness ID requirements often create barriers to needed services which has the potential to exacerbate the risk of death in the first few weeks after release.⁴⁸

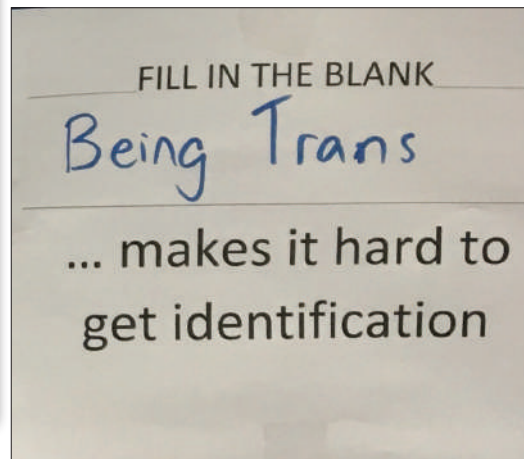
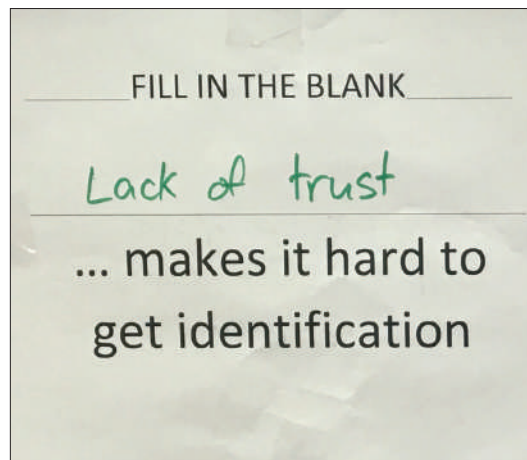
Citizens' Bridge recognizes the challenges that people exiting correctional facilities face, and have established ID clinics in various correctional locations across the Province. Citizens' Bridge however has limited funds and has difficulty keeping up with demand. Additionally, it is only through the provincial jails that the cost of ID is covered and inmates are only allowed to participate as a 'perk' for good behaviour.⁴⁹ In Stony Mountain (federal) inmates must pay for the cost of their own ID.

Children in Care and Homeless Youth

Children in care and homeless youth were not mentioned frequently during the interviews and data gathering process. This may be due, in part, to the fact that the bulk of the programming offered by SEED-Winnipeg and Citizens' Bridge do not target this demographic. Citizens' Bridge can support youth in their ID applications, however the youth can be no younger than 15 and must be seeking ID for the purpose of employment. SEED does support the application of ID for youth without a parent, however they don't track the number of youth who are connected to CFS.

An interview conducted with Ndinawe, a youth resource centre located in the Winnipeg's North End, indicated that homeless and at-risk youth do need ID to access a variety of services throughout the community, however they are often at a disadvantage in getting help to access ID because there is no programming mandated to specifically provide them with ID support services. Ndinawe's Housing Coordinator informally supports youth in accessing ID but does not formally fund an ID program, and it was indicated that at times, staff fund ID applications out of their own pocket. While homeless and precariously housed youth tend to lose ID frequently staff at Ndinawe reported that they are reticent to store their ID in a secure location (e.g. ID Storage) indicating that innovative solutions are required to combat this issue.

The Child and Family Services Division of the Province of Manitoba's Department of Families did not respond to a request for information about the supports they provide in helping children in their care access ID, however responses from community organizations working with this population indicated they are unaware of the extent, if any, to which these supports exist.



Costs of Not Having ID

While it remains difficult to measure the costs of not having ID, we do know that not having ID creates economic exclusions, a consequence that is likely exacerbated for already marginalized individuals. As previously noted, ID is required to access a range of government entitlements, commercial services, economic opportunities and financial systems. Employment and Income Assistance (EIA) requires applicants to provide ID. Applying for a job and filing taxes remains impossible without a SIN, which requires a birth certificate or other form of primary ID. Opening a bank account requires two pieces of ID.

ID is required to take advantage of asset building opportunities such as the Canada Learning Bond (CLB). CLB is a financial program introduced by the Canadian government to help lower-income families get a head start in saving for their child's post-secondary education. In order to take advantage of the CLB however, an RESP must be opened which requires ID. The CLB provides eligible families an initial payment of \$500 to children born on or after January 1 2004, plus an additional \$100 per year of eligibility until age 15 (to a maximum of \$2,000).⁵⁰ No personal contributions are required. The uptake for this program is still low however with an average

participation rate across provinces of 33.1 percent.⁵¹ SEED-Winnipeg indicated that they support program participants applying for the CLB, and that sometimes further support is required to get ID for their children. Lack of ID has the potential to affect the number of families that can afford to send their children to a secondary institution. Uptake on financial supports created for low-income earners will remain low if those who are applying are required to have ID but are unable to access it.

Not only do individuals experience lost opportunity caused by not having ID, but there is also a wider economic impact on governmental service providers. For example, if individuals cannot get a health care card they may resort to using emergency services over primary care, which can result in higher costs and present challenges for continuity of care.⁵² Lack of ID can impact homelessness as ID is required to apply for social housing. Homelessness is not only tragic for the individual that experiences it but also costly to Canadians. A 2013 report found that the emergency response to homelessness costs the Canadian taxpayer approximately \$7 billion annually.⁵³ This cost includes the cost of emergency shelters, social services, hospitals and corrections.

Promising Practices

The Province of Manitoba has made positive efforts in addressing some of the barriers low-income individuals face when trying to access ID. MPI and EIA have remained engaged on this issue and have worked to implement policy adjustments as noted above. Importantly, the Province of Manitoba has funded much of the programming at SEED and Citizens' Bridge which has had effective outcomes. This work should be applauded and it should continue. As with all policy and programming however, more can be done. This section briefly examines the programming of Citizens' Bridge and SEED-Winnipeg and also explore some promising practices in Alberta and Ontario which demonstrate how improvements could be made here in Manitoba.

Supports in Winnipeg

Currently, only two organizations in Winnipeg have multi-year funding dedicated to supporting clients in both applying for, and paying for, ID: SEED-Winnipeg and Citizens' Bridge.

Between September 1 2015 till August 31 2016, SEED's ID Fund helped 476 participants apply for 787 pieces of ID. Of those applications, 393 participants successfully obtained 657 pieces

of ID. Records were not kept as to how many of these pieces of ID constituted replacement ID versus new ID.

Citizens' Bridge supported 1,179 applications between Sept 2015 and Oct 2016 of which 584 were referred by EIA. Citizens' Bridge also held ID clinics in 12 different locations, supporting 536 ID applications, most of which took place in a criminal justice facility.

Practices Elsewhere

As a province, Alberta has done a tremendous amount of coordination amongst various agencies to reduce the barriers to ID for low-income, marginalized and homeless populations. A collaborative approach between Service Alberta, Alberta Health, Human Services and the Solicitor General has resulted in a multi-pronged approach to tackling this problem. An inter-agency approach has led to a collaborative effort, and the understanding that ID is part of a larger fight against poverty and homelessness.

One of these programming efforts is the Alberta Health Services (AHS) ID program for individuals seeking care at an AHS facility or with AHS community services and programs that don't

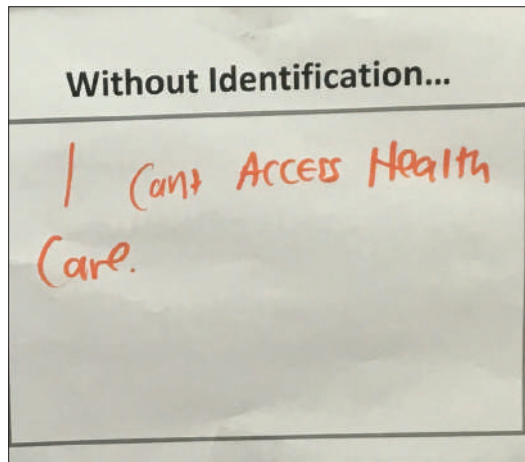
have government-issued ID and/or a health care card.⁵⁴ AHS designates an AHS ID specialist to help the patient obtain the documentation needed to prove their identity, residency and legal entitlement to remain in Canada. Because there is collaboration between departments the program is able to acquire IDs very quickly with most patients receiving their identification card and health card within two weeks from start to finish.⁵⁵

In order to combat patients losing their ID once it was acquired, an ID Repository at the Chinook Regional Hospital was established. The program director for Alberta Health Services ID Certifiers program reported that since its launch in 2013, the repository has had 3,100 clients for whom they have stored ID.⁵⁶ In Edmonton, a community organization Boyle Street Community Services created ID storage for their clients and over the past six years they have stored 1,400 pieces of ID for their clients. Both Boyle Street and the AHS indicated that by engaging with clients to

help them acquire and store their ID, a sense of trust is developed between patient and agency which allows for greater connectivity between marginalized individuals and service providers.

In Ontario, Services Ontario is collaborating with partner community organizations to waive the fee associated with applying for a birth certificate for individuals who are homeless.⁵⁷ Additionally, partnering agencies are given a direct contact with Services Ontario to help reduce time spent navigating difficult applications.⁵⁸

Initiatives elsewhere indicate that provincial governments and community organizations are coming up with innovative solutions to reducing the barriers that low-income and marginalized individuals face when trying to access ID. Through conversations with both community organizations and government agencies it became clear that there remains a role for both sectors in reducing the barriers for low-income individuals in accessing ID.



Opportunities for Improvement

In consultation with community organizations and governmental agencies working on this project, the following opportunities for policy reform were identified.

Fee Waiver

1. A waiver system for fees associated with obtaining birth certificates for low-income earners.

Rationale

In Manitoba, birth certificates are administered through the Vital Statistics Agency, a Special Operating Agency. Vital Statistics is governed by the *Vital Statistics Act*, which establishes the fee structure for Manitoba Birth Certificates.⁵⁹ The Manitoba Photo ID card is administered via Manitoba Public Insurance, a Crown Corporation. Currently, the cost of applying for a Manitoba Birth Certificate is \$30 while the Manitoba Photo ID is \$20. Vital Statistics does not waive fees, while MPI has already established a fee waiver for those applying who are on social assistance and for those who self-declare low-income (fee waivers are approved on a case-by-case basis).⁶⁰

A significant number of Manitobans struggle to provide the basic necessities and the fees associated with obtaining ID are too expensive for the approximately 14.8 percent of Manitobans currently live below the poverty line.⁶¹

Opportunities for Improvement

During this research it was communicated by Vital Statistics Manitoba that Vital Statistics is designated as a Special Operating Agency (SOA) by regulation under the *Special Operating Agencies Financing Authority Act*, which means that the Agency must cover all operating costs and is not in a financial position to waive fees.⁶² Yet provisions for waiving fees exist within the current Vital Statistics Act, which indicates that in certain circumstances fees may be waived:

“For the purpose of carrying out the provisions of this Act according to their intent, the Lieutenant Governor in Council may make such regulations and orders as are ancillary thereto and are not inconsistent therewith; and every regulation or order made pursuant to, and in accordance with the authority granted by, this section has the force of law; and without restricting the generality of the foregoing, the

Lieutenant governor in Council may make regulations and order,

(i) prescribing the fees to be paid for searches, certificates, and anything done or permitted to be done under this Act and providing for the waiver of payment of any such fees favour of any person or class of persons; and providing that any one or more services shall be rendered without payment of any fee in such cases, or to such government departments, public officers, courts, societies, organizations or persons as may be specified in the regulations...⁶³

Precedence exists in other provinces for waiving fees in certain circumstances. For example, in Ontario, Vital Statistics works directly with community partner agencies who help vulnerable Ontarians apply for and get ID. Services Ontario will waive the fee associated with applying for the birth certificate when the ID is applied for through a partnering agency. In both Alberta and British Columbia fees will be waived in the circumstance that a natural disaster has occurred (for example during the 2013 flood in southern Alberta). Additionally, the fee waiver program in Ontario provides community partners with a direct contact at Services Ontario who can help community organization staff navigate difficult applications. Both the fee waiver and direct contact/support was noted by staff in Manitoba as holding promise to reduce barriers for the clients they work with.

Exiting Institutions and ID

2. Support for individuals leaving prison and youth exiting CFS to obtain two pieces of government-issued ID prior to leaving, preferably a birth certificate (or piece of primary ID for those born outside of Canada) and one piece of photo ID.

Rationale

Individuals exiting correctional facilities face an array of complex challenges as they attempt to

re-integrate into the community.⁶⁴ Youth exiting care face similar challenges. ID is required for everything from accessing EIA to housing, to the food bank. If supports are not provided in a timely manner, it stands to reason that the likelihood of falling into (or back into) crime increases. The application for a birth certificate can take up to six weeks. Applying for ID prior to exiting reduces one of the barriers that both of these groups face.

At the federal level all inmates are released with a federal Prison Service card which, while it contains a name, birth date and other identifying information does not solve the dilemma of prisoners requiring ID once released. Firstly, this card is not recognized as government-issued ID and therefore does not prove helpful when trying to access services that require government-issued ID.⁶⁵ Secondly, even if it did constitute a form of government-issued ID, it opens up inmates to judgment and stigmatization, which reduces the likelihood that ex-inmates will want to use this type of ID.

Youth exiting care may face multiple barriers when applying for ID including a lack of family connections, lack of support in navigating the application process, and cost. At present, no programs specifically mandated to help youth exiting care access ID were identified during this research.

Citizens' Bridge currently operates ID support services in both federal and provincial correctional facilities in the province. In Stony Mountain (federal) Citizens' Bridge is brought in through the prison's re-integration program to help inmates apply for ID, however because Citizens' Bridge's funding comes from the province they are unable to pay for the application of the birth certificate or other ID costs. Inmates pay for their birth certificates themselves, and if they are unable to cover the costs they are not permitted to participate in the program.

Citizens' Bridge also operates in provincial facilities including Winding River and Winding

River II (within Headingly Provincial Jail), the Women's Correctional Centre, Agassiz Youth Centre, Brandon Correctional Centre as well as the Remand Centre in Winnipeg. With the exception of when an inmate is Released on own Recognizance (ROR), the applications are conducted at the facility by either Citizens' Bridge staff, or by a Program Officer at the jail. Citizens' Bridge has trained staff in Brandon CC as well as the Remand Centre on how to complete the applications. Citizens' Bridge can cover costs because the facilities are provincial and re-integration falls under the mandate of employment services (where the bulk of Citizens' Bridge's funding comes from). Manitoba Youth Justice sends referrals and Citizens' Bridge also works with both Probation and Parole Services to help individuals apply for ID and open bank accounts.

Between September 30th 2015 and October 31st 2016, Citizens' Bridge applied for 360 pieces of ID in both the federal and provincial correctional facilities, as well through Probation Services (Manitoba Justice).

Opportunity for Improvement

The initiative between Citizens' Bridge and the province's correctional facilities (and one federal institution) demonstrate promising collaboration towards reducing some of the barriers to re-integration faced by inmates upon their release. More can be done however.

Given that the identity of each individual incarcerated has been rigorously verified and as ID is a crucial part of re-integration, the correctional system represents an ideal location to provide ID to those who might otherwise face barriers to accessing it once they are released. Additionally, for those in Federal custody (which involves a minimum of two years in custody) guarantors would be readily available (Corrections Officer is a listed professional on the MPI Guarantor Declaration Form). Both the Federal and Provincial Correctional Facilities should ensure each prisoner released is provided with two

pieces of ID prior to leaving, and ideally both a primary ID and a piece of photo ID. Additionally, permanent funding for agencies like Citizens' Bridge would help support their on-going efforts in the correctional system.

While The Child and Family Services Division of the Province of Manitoba's Department of Families was asked to be interviewed for this report, no response was received. Therefore it remains difficult to assess what level of support children are given in accessing ID prior to exiting care. As CFS has verified the identity of the child that they are working with, CFS is well positioned to help that child apply for ID prior to exiting care. Additionally, CFS workers are much better equipped than those working outside the government to navigate the complexities of applying for ID and if they are a registered social worker can act as a guarantor for MPI photo ID. Partnerships with an ID Bank could be facilitated in order to ensure that youth do not lose their ID once they have acquired it.

ID Bank

3. Establish dedicated funding for an ID Bank in Winnipeg

Rationale

ID banks are found throughout various jurisdictions in Canada. Some are government-run while others have been established within community organizations. Generally, these storage facilities will hold onto ID for their clients who can then come and check it out when needed. In researching various locations, it was reported that this type of initiative demands a fairly high-level of trust between the client and the organization. It was also reported in interviews that certain groups of individuals would be less willing to use ID Storage. These groups included youth, for whom it was reported derive a sense of identity and 'adulthood' from having ID; Indigenous populations who have a distrust for government

(if the facility is government-run) due to colonial relations; as well as those who experience psychotic and paranoid delusions. Nonetheless, these storage facilities can be hugely beneficial to individuals who have difficulty securing their ID.

In Edmonton, Boyle Street Community Services has had significant success in creating ID storage for their clients. Over the past six years this community organization has expanded to store 1,400 pieces of ID for their clients. ID is stored in locked filing cabinets in a room that is double-bolted and fire-proof.

In Alberta, there are various ID repositories throughout the province that are run by the Alberta Health Services (see *Promising Practices* for more detail on the AHS's collaborative approach to reducing barriers in accessing ID). Both Boyle Street and Alberta Health Services reported that ID Storage can act as a service that facilitates greater engagement in existing programming and services for individuals who may otherwise remain marginalized.

In Montreal, social service agencies are taking a different approach to storing ID for at-risk clients. *Reconnect* is a virtual platform to which identification documents can be uploaded by a social or community worker for their client.⁶⁶ The client holds the password, and can access their information anytime from any computer. Such a model proves beneficial in that the documents can be accessed from any computer with internet access. Possible concerns about this model were noted by key informants that copies of government ID (as opposed to the original document) are not particularly useful except when working with a specific agency or in facilitating getting replacement ID. Additionally, concerns about the ability of clients who experience cognitive impairment and mental health issues to remember their password were also raised.

Opportunities for Improvement

No ID bank currently exists in Winnipeg, although some organizations will informally hold

onto their client's ID when asked. Citizens' Bridge is well positioned to start an ID bank given that they already work with clientele that struggle with getting and holding onto ID. In researching other models of ID banks it was noted by staff at Boyle Street in Edmonton that a sense of trust between staff at the ID bank and the clients is important, as well as close proximity to the areas that clients are most likely to frequent, both of which Citizens' Bridge has already established.

Guarantor

4. Expand the guarantor list for MPI photo-ID to include professionals that low-income and/or marginalized populations are more likely to have contact with such as EIA caseworkers.

Rationale

Frequently noted in consultation with community organizations working on the issue of access to ID was that many of the clientele that they work with struggle to find a Guarantor listed on the Guarantor form (see *Appendix: Declaration of Guarantor for Proof of Identity*).

The responsibility of agencies issuing ID to authenticate the identity of the applicant is of utmost importance. It was noted however that many low-income individuals do not have contact with many of the professionals on the list for the minimum duration of two years. It was stated in conversation with MPI that they make it a priority to work with applicants who struggle to fulfil this requirement on a case-by-case basis. Community staff working on this issue noted that if the listed professionals on the guarantor form were to include EIA caseworkers, this would alleviate a tremendous amount of work undertaken by staff at SEED and Citizens' Bridge.

Opportunities for Improvement

The list of guarantors was initially taken from other Canadian jurisdictions and Passport Can-

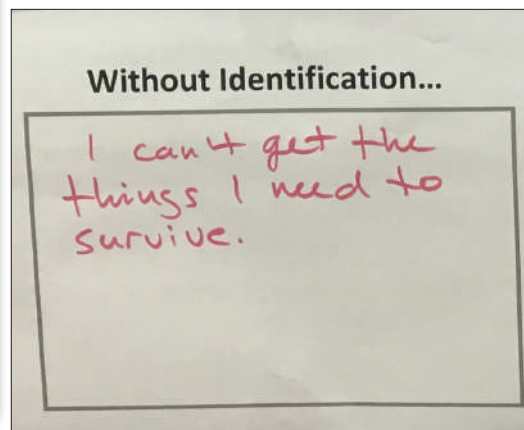
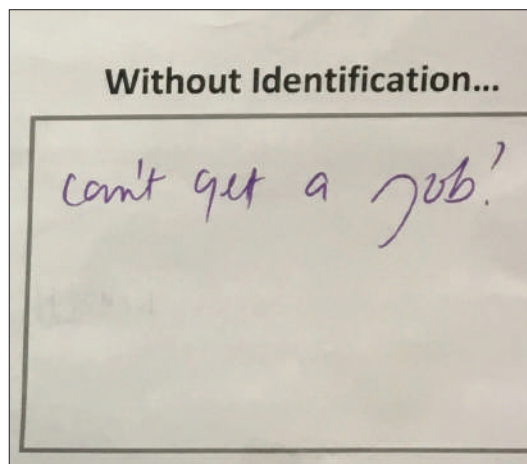
ada.⁶⁷ The list of eligible guarantors is contained within the regulations of the legislation that governs MPI photo ID, and any changes to that list must come from government.⁶⁸ Encouragingly, MPI noted that it strives to keep the list of guarantors relevant and is open to making recommendations to government regarding expanding or changing the list of guarantors. Further investigation into the best way forward on this issue requires meaningful consultation and collaboration between community organizations dedicated to this issue alongside government.

Additional Concerns

In addition to these above reforms, areas of concerns were identified in three other instances relating to ID access and provision in Manitoba.

Given the constraints on the scope of this report, these areas of concern were not explored to full potential but rather have been identified as next steps. These areas of concern include: greater support for those experiencing difficulties navigating ID systems including training for front line staff in a trauma-informed care lens; and providing greater support to new parents during the registration process when children are born.

One final concern raised by community organizations was that the burden to reduce barriers to ID for low-income Manitobans not be placed solely at their feet. Many of the organizations interviewed operate on a tight budget with limited staff, and noted that increased funding alongside collaboration with government would be helpful in moving forward.



Conclusion

The need to provide proof of identity when accessing services is ever increasing. ID is required to access a range of government entitlements, commercial services, economic opportunities and financial systems. Yet the provision of ID can be complex. There is no one overseeing authority that governs all forms of ID therefore inter-agency and bureaucratic difficulties are bound to arise. A comprehensive and collaborative approach to addressing the barriers to accessing ID should be understood as one part of the broader effort to address poverty and homelessness. Reducing barriers to accessing ID has long-term and cost-saving benefits by ensuring that everyone can participate fully, both socially and economically.

Provincial departments and agencies have made positive efforts in addressing some of

the barriers that low-income individuals face when accessing ID. This report however, demonstrates that as the need to prove our identity is ever-increasing, effective supports and programming must be created and maintained to ensure that all citizens can access ID so that they can fully and actively participate in society.

Recognizing that for some, the barriers to ID result from the ongoing impacts of colonialization, government has a responsibility to proactively address these historical wrongs. Further, the effort to reducing barriers can also be understood in line with the spirit of the Truth and Reconciliation Commission's calls to action to "redress the legacy of residential schools and advance the process of reconciliation".⁶⁹

Appendix A: Declaration of Guarantor for Proof of Identity



Box 6300
 Winnipeg, MB R3C 4A4
 Phone: (204) 985-7000
 Toll-free: 1 800-665-2410
 Hearing Impaired Line: (204) 985-8832

Driver's Licence
 Identification Card

Declaration of Guarantor for Proof of Identity

Please print in black or blue ink and print this form single-sided.

Applicant's Information (must be completed in the presence of the guarantor)	
Legal Surname: _____	Legal Given Name(s): _____
Physical Address (no PO Box #s): _____	Apt. #: _____
City, Town or Village: _____	Postal Code: _____
Date of Birth: (mm/dd/yyyy) _____ / _____ / _____	
I certify that I am the individual named above, and that my date of birth and residential address are as stated above, and the signature below is my signature.	
I consent to Manitoba Public Insurance collecting the information about me set out under the Applicant's Information section from my guarantor and such other personal information about me from my guarantor or other third parties as necessary to verify my eligibility for the driver's licence or identification card.	
Applicant's Signature _____	<i>If Applicant under 18 years of age</i> Legal Guardian(s) Signature: _____
Choosing an Eligible Guarantor	
Your guarantor must :	
<ol style="list-style-type: none"> 1. Be a Canadian citizen residing in Canada 2. Have known you for at least two years 3. Meet the occupation or offices criteria exactly as described 4. Fully complete the Declaration of Guarantor section on the reverse side of this document 	
WARNING to all applicants and guarantors – Any false statement, misrepresentation or concealment of any material fact on this form, or on any other document presented in support of this application, may be grounds for criminal prosecution.	
The personal information contained in this form is collected under the authority of section 12 or 150.5 of <i>The Drivers and Vehicles Act</i> and under the authority of section 36(b) (information relates directly and is necessary for a program operated by Manitoba Public Insurance) of <i>The Freedom of Information and Protection of Privacy Act</i> . The personal information is used to administer the driver's licence or identification card records.	
If you have any questions about the collection of your personal information, please contact the Manitoba Public Insurance Contact Centre at (204) 985-7000.	
Declaration of Guarantor (must be fully completed)	
Surname: _____	Given Name: _____
Name of Firm/Organization: _____	Official Title: _____
Business Telephone: _____	Home Telephone: _____
Business Address: _____	
Knowledge of Applicant (# of Years): _____	
IMPORTANT You must have at least TWO years knowledge of the applicant to be an eligible guarantor.	

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