



Ontario Association of  
Children's Aid Societies

The voice of child welfare in Ontario

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July 30<sup>th</sup>, 2008

Growing Stronger Together  
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To Whom It May Concern:

The Ontario Association of Children's Aid Societies (OACAS) is pleased to have an opportunity to contribute to the Ontario government's consultation regarding the important matter of poverty.

Children's Aid Societies witness the devastating impact poverty has on families and children on a daily basis. OACAS and its members support all efforts to reduce poverty, with the ultimate goal of eliminating poverty in Ontario.

By eliminating poverty, we allow our communities to grow stronger, our children to flourish and all adults in this province to lead healthy, safe lives, in dignity. To succeed, it requires compassion and commitment.

OACAS welcomes the opportunity to share its experience and expertise by participating in further consultation with the Government of Ontario, in an effort to ensure that poverty does not impact Ontarians.

Sincerely,

A handwritten signature in black ink that reads "Donna Denny".

Donna Denny  
President

A handwritten signature in black ink that reads "Jeanette Lewis".

Jeanette Lewis  
Executive Director



## **Strong Families Creating a Strong Ontario**

*OACAS Submission to the Government of Ontario's  
Poverty Reduction Strategy*

July 30, 2008

The Ontario Association of Children's Aid Societies (OACAS) welcomes the opportunity to provide a submission to the provincial government's public consultation regarding the important matter of poverty in Ontario.

The Ontario Association of Children's Aid Societies (OACAS) is a membership organization representing 51 of 53 Children's Aid Societies (CASs) in Ontario. The OACAS, in support of its members, is:

*...the voice of child welfare in Ontario, dedicated to providing leadership for the achievement of excellence in the protection of children and in the promotion of their well-being within their families and communities.*

For the past ninety-six years, the OACAS has demonstrated a history of successful advocacy, member services, and public education on behalf of its member societies, and the children and families that are served by CASs in Ontario. The strength of the OACAS lies in both the extent of its membership and the commitment and participation of the 51 member agencies.

In 2007-08 Children's Aid Societies conducted over 78,000 investigations of child abuse and neglect, provided ongoing services to approximately 43,000 families to assist them to care for their children and provided substitute care to almost 18,000 children.

### Introduction

A large proportion of the clients referred to Children's Aid Societies by members of the community are touched by poverty. Children's Aid Societies witness the devastating impact poverty has on families and children, on a daily basis. OACAS supports all efforts to reduce poverty, with the ultimate goal of elimination of poverty in Ontario.

Poverty is one of the greatest barriers to opportunity, prosperity and the well being of many, many children and families in Ontario. Their situations are worse now than they were prior to 1995. For those on social assistance and the working poor, the cost of living continues to grow and their incomes have not kept pace. The gap between rich and poor is increasing. The downturn in the economy, felt in communities across Ontario, has a direct impact on family stress, coping and the ability of family members to care for their children and themselves.

The OACAS supports the government direction to address poverty. It must be done through comprehensive and integrated policy and supports across all ministries of government, and involve a broad range of stakeholders, including those most affected. In order to achieve any level of success, the government must state their principles, and it must develop and communicate an action plan with timeframes and measurable targets.

The six questions posed in the consultation document apply to the broader population in Ontario, and some are very relevant to child welfare service providers. In responding, OACAS has responded to the questions, and in some cases offers responses which reflect the experience and expertise of Children's Aid Societies.

**1. Given that our first priority is children and their families, how can we do a better job with existing resources to improve opportunities for children living in poverty?**

It is questionable that there are enough **existing resources** currently. Certainly, at the level of the individual family, living in poverty, there are fewer resources available to them now than there were fifteen years ago. Further, we hope that the goal of government is to move families and children **out of poverty** rather than improve their opportunities while **living in poverty**.

The Ontario government has taken steps to address poverty. These are to be commended. They include but are not limited to, increases to the minimum wage, the Ontario Child Benefit, dental services for the poor, employment and training programs, and specific measures for Children's Aid Societies' Crown wards.

We support these changes and recommend that they, along with additional measures, be integrated into the action plan and become part of an annual "report card". Having noted this, OACAS suggests the following areas of priority and suggested action to improve opportunities:

**a) Eliminate disincentives and claw-backs in government income support programs, employment incentives, grants and loans:**

*General Comments:*

The government has taken some steps to introduce programs to support the poor. At present, claw-backs and disincentives exist which undermine the intent of some of these programs and remove the intended "opportunity" factor. The government of Ontario should undertake a review of all programs to ensure that those receiving services and benefits get the maximum impact intended and have incentives to move to greater self-sufficiency. Some examples include:

- Provide access to **full health, prescription and dental services** for those moving from welfare programs into low-income jobs.
- Remove **claw-back of Ontario Child Benefit** to mothers on Ontario Works.
- Provide some **incentives for the poor** to establish and maintain limited savings without loss of benefits.

*Comments specific to Child Welfare:*

- Reassess **rules for post-secondary loans** and grants to ensure that charitable contributions to students do not offset "forgivable loans". At present, when youth receive scholarships or bursaries from charitable donors, these funds are considered income for the purposes of OSAP, and they reduce the forgivable loan on a dollar-for-dollar basis. The effect of this rule results in the donation making no difference to the young person and the donor contribution is clawed back.

**b) Continue and enhance investment in a range of community prevention and intervention programs:**

*General Comments:*

OACAS supports the provincial government turning its attention to prevention programs in child welfare, which will decrease the number of children who come into care. Ensuring that children are protected is the first critical step. OACAS presents the following recommendations:

- Continue to support broad-based, community-anchored **prevention programs**, which are needed to increase the capacity and resiliency of families.
- Ensure adequate services to address **mental health** concerns and **addictions**.
- Provide related supports to assist young parents to graduate from high school, gain skilled employment and find affordable quality **daycare**.
- Rebuild Ontario's capacity to offer safe, affordable and, where warranted, supportive **housing** to those in need.
- Expand **recreational** programming, including community pools, after school programs and sports to help mitigate risk, improve self-esteem and provide broader, more enriching learning opportunities.

*Comments specific to Child Welfare:*

- Expand “Capacity Building” funding to Children’s Aid Societies to enable flexibility in development and/or enhancement of local supports to prevent the need for child protection services.
- Consider providing base funding to Positive Parenting and other prevention programs where they have demonstrated success in reducing admissions to more intrusive services.

**c) Act “as a good parent would” in supporting Crown wards to successful adulthood**

*Comments specific to Child Welfare:*

This province’s Crown wards often experience so many complex transitions in their young lives that many never fully recover, as adults. Crown wards in Ontario graduate high school at approximately half the provincial average of their peers. They are over-represented in our mental health systems, youth and adult justice systems, and social assistance. As older teens, they experience extremely high rates of homelessness and often go on to lead lives of poverty, as adults.

OACAS recognizes the important steps taken by the Government in support of Crown wards and former Crown wards, including post-secondary grants, the RESP initiative for those currently under six years of age, and the recently announced Ontario Child Benefit “equivalent”.

We encourage the government to continue this work to help children and youth bridge difficult transitions.

The OACAS recommends the following in support of being a better parent for our children and youth:

- Provide priority access to **Educational assessments in elementary school** for children who have just entered care of a children's aid society. Allowing these supports to transfer between school boards so a child's education is not disrupted.
- Ensure that **transportation** is made available for children and youth who are forced to move so that they can remain in their home school. School disruption and delays in re-registering are key factors contributing to children falling behind in school. This issue was the subject of a Private Member's Bill in an earlier session of this government. This draft Bill should be reintroduced and expedited through the legislative process.
- Ensure that all Crown wards benefit from assessments in secondary schools by **Student Success Teams**, who will then take responsibility for ensuring Crown wards graduate in their school.
- **Extend living allowances for Crown wards** (Extended Care and Maintenance) attending post-secondary school, until graduation. Of the youth who remain connected to the child welfare system until the age of 21, only 21% go on to a postsecondary education. Many of these youth are not able to graduate, or take much longer to graduate, due to financial concerns. Continuing financial support until they have completed their studies will help them stay in school until graduation. This support is provided in other provinces across Canada but is not available to Ontario's wards.
- Change OSAP policy to ensure that bursaries and scholarships are not clawed back (see Q 1a)
- **Revisit the ECM** living allowance (for 18 - 21 year olds) from the minimum of \$663 a month which was **set in 1994**. Increase the rate and include an annual cost of living adjustment to ensure the system does not "graduate" Crown wards into poverty.

#### **d) First Nations**

Opportunities available to First Nations people in Ontario are more seriously compromised than any other sector of our population. OACAS recognizes the important step taken by the Ontario government in creating the Ministry of Aboriginal Affairs. The OACAS is optimistic that this ministry will work across government to develop a comprehensive strategy which addresses social, health, educational, economic and community development issues, as well as land and mineral rights which will enable the development of strong economies for First Nations communities.

The strategy to promote opportunities for First Nations people must address the needs and interests of people living on reserve and off reserve. It must apply to urban and remote populations.

*General Comments*

- Respect existing legal entitlements related to land, social and health services, including those set out in the 1965 Indian Welfare Agreement.
- Ensure that First Nations communities have access and control of their resources so that they can develop sustainable economies.

*Comments specific to Child Welfare:*

OACAS calls on the government to review and respond to the recent report of the Federal Auditor General of Canada report. In particular, Ontario needs to advocate with Indian and Northern Affairs Canada to address:

- **Appropriate, comparable and adequate** services for First Nations Services. This has long been a concern and was a key finding in the 2003 evaluation of Child Welfare Reform.
- Adequacy of funding for remote First Nations child welfare services, and **documented issues in its “Northern Remoteness – North of 50”** report to government in 2006.
- Concerns raised by Aboriginal CASs and emerging First Nations agencies; in particular, related to consultation, adequacy of funding to meet real needs of children, and the lack of funding to deal with the administration and additional standards for service that have been added over the years.
- Recognizing the Federal role, Ontario should:
  - Ensure that the transfers promised to support the development and ongoing operation of Aboriginal Child Welfare services is delivered.
  - Recognize that prevention services are legitimate and essential child protection services which serve to build capacity of individuals, families and communities, provide critical positive parenting skills needed by First Nations people. Prevention models such as Mamow Oshki Pimagihowin, which is being implemented by Tikinagan Child and Family Services, are the only resources in many of the remote fly-in communities. They must be supported in order to prevent further admissions to care and to support the healing in these communities.
  - Support the continuing devolution of child welfare services to Aboriginal communities, respecting the right to self government and working in partnership with all CASs and other stakeholders.

## **2. *What new ideas could we incorporate into our existing supports that would increase opportunities for children living in poverty?***

In addition to the recommendations above, OACAS recommends the following new ideas to increase opportunities:

### **Mental Health and Addictions Services**

While available for some people in some communities, levels of services for children, adolescents and adults are inadequate to meet their needs. This lack of services has a tremendous impact on individuals, their employability, their families, and society, as a whole.

### **OHIP numbers for all newborns**

Ontario should provide OHIP numbers immediately to all children born in this province, regardless of their parent's legal status. The newborns of illegal immigrants, born in Ontario, should receive a temporary OHIP number upon release from hospital. These newborns must be integrated into our community, mitigating the risk of not having access to health care following their birth.

### **Dental care for children, youth and those transitioning from support**

Ontario should provide free dental care for all children in need, across Ontario. Poor dental hygiene and care is an indicator of neglect. By helping families in need begin to proactively manage their health care needs before a crisis emerges, we help children develop self-care routines that they will take into adulthood and apply to their own children, thereby reducing these costs, in the future.

### **Neighbourhood report cards**

Ontario should introduce Neighbourhood Report Cards, which would capture availability of services, demand for those services, basic demographics and a poverty measure for neighborhoods across Ontario. This would allow for a basic comparative analysis between neighbourhoods in a format which is accessible and understandable to the public.

### **Recognizing credentials of new immigrants**

Ontario needs to get serious about taking advantage of the pre-existing skill set and education of immigrants to Ontario. New immigrants should not be underemployed in low-skilled jobs when we could be taking advantage of their advanced skill sets and education. By allowing new immigrants to maximize their potential, we lift their whole family from poverty, drive our economy forward and send a clear signal that Ontario wants the same for all Ontarians.

**3. We know that communities are best positioned to understand and respond to the local realities of poverty and opportunity. What is already working in your community to support children, youth and their families living in poverty to achieve their potential?**

*General Comments*

**Pre-natal care**

OACAS acknowledges the benefit of some of the community programs in place; for example Healthy Babies, Healthy Children, and Best Start programs. OACAS recommends full access to comprehensive, flexible pre-natal care for all pregnant mothers and that these services include screening, counseling and support related to health, nutrition, lifestyle, and parenting skills.

**High quality early childhood programs for all children**

OACAS commends the provincial government's direction to move to full day junior and senior kindergarten. OACAS suggests that introducing full day public education for children a year before junior kindergarten could also further help to limit childhood poverty by increasing their parent's ability to provide for their needs through work and through reduction of child care payments. This, along with the expansion of breakfast and lunch programs, will help to support those families in the greatest of need and allow children to maximize their academic potential.

**Services to children and youth in conflict with the law**

The government should review the approach to prevention and intervention service for children and youth in conflict with the law, or those at risk. This would include increased investments in:

- prevention strategies in high risk neighborhoods;
- anti-bullying programs;
- mentoring programs which provide long-lasting role models for at-risk youth;
- positive parenting programs (which are being demonstrated in Eastern Ontario Children's Aid Societies);
- domestic violence prevention and intervention (including structured programs for abusive males);
- diversion programs which provide intensive supports to youth who have come into conflict with the law.

In general, OACAS recommends a more focused approach to providing individualized services and supports to the families, which may be through children's mental health, child welfare, domestic violence programs, and which have the flexibility to wrap these programs around children and families.

*Comments specific to Child Welfare*

The provincial government has responded to the needs of children's safety and protection through the *Child and Family Services Act* (CFSA), which ensures that children's safety is its

primary duty. Through the “Transformation Agenda” government has broadened children’s permanency options by making it easier to place children in adoptive homes, in customary care and with kith or kin. While this is a positive move, it needs adequate funding for these efforts, so that families have the true supports they need to care for their own children. This includes:

- Counselling and support to kin families as they take on the responsibility of caring for children who have been exposed to abuse and neglect.
- A standardized set of services and subsidies for grandparents, ending the disparity between those who receive foster care allowances and services from CASs and those who receive only minimal financial support from Ontario Works.<sup>1</sup>
- Prevention programming for children and families who come in contact with the child welfare system, allowing families to remain intact.

The “Transformation Agenda” included other service changes that are built on best practice research from Ontario and other jurisdictions. “Community Capacity Building”, including flexible funding to enhance local service systems, was integral to the success of the system redesign. This aspect requires assured adequate and on-going funding in order to support families and prevent the need for children to be admitted into protective care.

Many youth are being served by their CASs with services such as extended foster care (to 21 years), specialized agency-based counseling and crisis services, volunteer mentoring programs, drop-in meal and laundry programs. There are a myriad of supports across the province, with unique services in every community. Youth tell us they want to stay connected to their agency beyond 18 years and beyond 21 years. A flexible approach is needed to allow youth to receive the supports from those who know and understand them. While much of this is not mandated or funded, it should be encouraged and supported.

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<sup>1</sup> The Transformation Agenda included increased focus on “kinship care”, which encourages the child protection system to look at the extended family as an alternative to traditional foster care. Two streams of service and subsidies have emerged. “**Kinship in care**”, in which the child is admitted to protective care and the family home meets government set regulations for care providers, has routine contact with the CAS and receives services. In these cases, the kin receive approximately \$900 per child each month. The second stream is “**Kin service**, or “Kin out of care”, where the intervention of the family has prevented the child from formally being taken into protection care. In these cases, the CAS may or may not have a relationship with the kin, and the kin family may apply to Ontario Works for a subsidy, which is \$231 for the first child and \$188 for subsequent children. Grandparents in care giving roles have raised concerns about the discrepancy and have asked for a review of this policy.

**4. We know that to be successful we must all work together. How can we better integrate the roles that we all play — individuals, not-for-profits, the private sector, volunteers and all levels of government — in increasing opportunity for Ontarians living in poverty?**

*General comments:*

OACAS believes that we, as community, must recognize that those living in poverty often touch many systems. Fragmenting their various needs across these systems increases their dependency and reliance on a multitude of “access points.” Removing and reducing these “silos” should be considered a priority for the provincial government. “Wrap around” models of care, or continuity of care, which consider a person’s needs, as a whole, are more respectful of that person and has a greater likelihood of supporting them to move themselves out of poverty.

**Increase the use of technology to link people with resources**

The introduction of a website which matches needs of an individual to services available, both provincially and in their community, would be of tremendous value in Ontario. This could bring together information about a variety of services, which are currently fragmented across “silos,” ensuring all consumers have access to the same information, increasing their opportunity to access existing services. While not everyone living in poverty will be able to take advantage of this system, it would still provide added-value for those who can access the internet through community libraries and community centres.

**Support the development a “single identifier” for Ontarians**

For many years, service providers and government have considered the development of a single client identifier that would eliminate the need for clients to repeat “tombstone” data and tell and re-tell their stories. It would also provide a means to link services and outcomes across government departments. OACAS supports this concept as a means to reduce the bureaucracy to the people seeking and receiving services, and as a way to break down the silos between service systems. However, any work to examine feasibility must ensure complete protection of the privacy of all Ontarians.

**Reinstate a provincial social housing program**

A provincial plan for social housing is essential to ensure that Ontario can build a unified, cohesive, equitable social housing infrastructure. Municipal control of social housing provides communities with the ability to opt-out of their responsibility in providing for those in need, while other communities struggle, in good faith, to provide for all members of its community. In order to level the playing field, the provincial government must take a strong leadership role in social housing.

Greater participation by developers in integrating social housing into their new communities must also become a priority. New communities which mix a small percentage of unidentifiable social housing in to their offerings will help Ontario build sustainability, over time. Social housing is a responsibility of both the public and private sector.

### **Expand Public Transportation**

The provincial government should be commended for beginning integration of public transportation in the GTA. This should be expanded, deepened and supported by an ongoing infrastructure expansion program. For public transportation to become the first option for individuals, the provincial government must see it as its first option. A strong public transportation system across Ontario helps facilitate people moving from poverty to economic sustainability.

*Comments specific to Child Welfare*

### **Recognize Crown Wards as OUR children**

Crown wards may live in one community their entire lives but when they attempt to access services, such as mental health supports, they are told their wardship was signed in another jurisdiction and they must apply for services in that jurisdiction. When they change school boards, their special education supports do not follow them and they must re-start the process of assessment, often delaying acceptance of their school registration.

As Crown wards transition out of care, they often have difficulty obtaining adult supports, such as ODSP or adult housing. The result is often homelessness. Ontario has a responsibility to ensure these multiple transitions are managed. In the case of Crown wards transitioning from care, all parties should be required to come to the table to plan for and ensure appropriate adult services are in place, in anticipation of them leaving the child welfare system. As parents, this is our responsibility. We share this responsibility with all departments of government, with child welfare service providers, with community partners and volunteers, and with charitable donors.

### **5. *We are focusing on children first, but we will develop a comprehensive, long-term poverty reduction strategy for all people living in poverty. What are the key long-term goals for improving opportunity with respect to groups other than children.***

The long-term goals would be measurable improvement in economic, health, social, educational and employment opportunities for all Ontarians. For example:

- economic – first an accepted definition of poverty, and then measureable, targeted steps to elimination of poverty;
- health – improved health outcomes, as suggested by experts (such as longevity, activity, reduced incidence of life-compromising diseases), facilitated by timely access to high quality universal health care;
- social – reduced incidences of crime, violence against women, children, reduction of child abuse and neglect, reduced incarceration and recidivism;

- educational – increased graduation rates and retention rates, increased matching of people who are skilled and trained with current and emerging employment opportunities;
- employment – decreased unemployment and under employment.

These goals would be described as targets, with clear steps and ambitious implementation timelines. In support of this, there must be:

- **Collective ownership**, so that all Ontarians recognize the impact of poverty. The poor are not “others,” they are us, living in a different set of circumstances.
- **Civic engagement** as a strategy to engage all Ontarians with their community as participants and contributors, including children, youth and adults. Through volunteerism, political engagement and efforts to enhance their sense of ownership of their own community, we build individual and family resiliency.

**6. *We need to be able to measure our progress on poverty reduction. What measures do you think will best show our progress in improving opportunity for Ontarians living in poverty?***

In order to measure progress on eradicating poverty, there must be a **baseline**, a **plan** and **targets**. The government has created targets for high school graduation. It should do the same for poverty in Ontario. Suggested targets would relate to:

**Poverty, starting with an accepted definition**

Consideration of a new Ontario poverty measure, partly anchored by LICO (Low Income Cut Off), MBM (Market Basket Measure) and LIM (Low Income Measure), which would provide a good foundation.

**Minimum wage**

The government has already begun to take steps to address minimum wage; the end goal is “adequate” and indexed to cost of living. A person working full-time and who still lives in poverty represents a significant failing of our province. This is a critical measure of progress.

**Employment**

Ontario needs to measure the number of high skilled jobs. Ontario will not succeed if it continues to replace high skilled jobs with low-skilled jobs. Ontario needs a greater focus on skills-based training to ensure that Ontarians can fill those high skilled jobs which we have difficulty filling.

**Child Care**

The government must move beyond counting the number of available child care spaces. It must also measure the number of people on waiting lists for spaces, the cost of child care in local communities and then compare it to the income of those applying for a child care space.

## **Health, including mental health**

Ontario needs to measure supports and services available for those suffering from mental illness and addiction. Mental illness and addictions cut across families of all income levels. The long-term effects often result in individual suffering, family disintegration and eventual poverty. Ontario must recommit to caring for people's mental health in the way it has recommitted to health promotion. The province must address the lack of capacity of our current mental health sector and addiction systems to meet the needs of all Ontarians. This is essential to reduce, and hopefully eliminate poverty in Ontario.

## **Graduation Rates**

The Ontario government needs to begin to measure the high school graduation rates and post-secondary enrollment and retention rates of Crown wards, and other marginalized populations, transitioning to adulthood. By tracking these youth and comparing them with the broader population, we can identify the problem, set clear goals and introduce change to improve the opportunities for Ontario's wards.

## **Child Welfare Services**

We know that an Ontario with a strong social safety net will be an Ontario which refers fewer children to the child welfare system.

Ontario measures should be made available in an annual Provincial Report Card, with targets and progress toward those targets described each year. This is the responsibility of the Ontario government.

## **Conclusion**

The Ontario government should be commended for prioritizing children and families in its poverty strategy. Children's Aid Societies see the impact of poverty on children and family on a daily basis, across Ontario. We recognize that a child who grows up in poverty is more likely to experience poverty, as an adult. By erasing childhood poverty, we create the opportunity to eliminate adult poverty for future generations.

By eliminating poverty, we allow our communities to grow stronger, our children to flourish and all adults in this province to lead healthy, safe lives, in dignity. To succeed, it requires compassion and commitment.

OACAS welcomes the opportunity to share its experience and expertise by participating in further consultation with the Government of Ontario, in an effort to ensure that poverty does not impact Ontarians.

