

Laidlaw Policy Priorities 2019 & Beyond

A brief outline of the three priority areas we have and continue to explore from 2018 onwards based on research, analysis and grantee consultations. In order to make any substantial impact or policy change it is recommended that a focus on one area, specifically youth-in-care becomes the primary issue area.

Executive Summary

The Laidlaw Foundation is deeply committed to serving young people who are traditionally underserved by their communities and by the system. The following three policy areas outline some of the challenges faced by young people; particularly Black and Indigenous young people along with opportunities for Laidlaw to play a role through granting, convening or research. A common thread throughout all three policy areas is the overrepresentation of Indigenous youth particularly and a failure to adequately address their needs, lived experience and historical barriers under each system. There are opportunities for the Foundation to play a larger role in the youth-in-care system and other opportunities where the Foundation can continue to excel in backing the advocates, organizations and youth who are already engaged in advocacy through granting, convening and research.

Youth Justice

We have been deeply involved with grantees who focus on youth justice and pre-trial detention reform. We have been supporting Nikki Browne of Nikki Knows/Project LUCID in her collective impact activities and have directly involved her in the previous government's Correctional Services Transformation Act (Bill 6), including meetings with the Minister's staff and prepping her for a committee submission. We have also been working with Legal Aid Ontario, the John Howard Society and the Canadian Civil Liberties Association on addressing some of the challenges that exist for youth on remand. We have begun to build relationships with the new government but as of now, have not been made aware of any plans to implement the recommendations in Bill 6, they have however noted that reducing the remand population is a key priority.

Problem Definition (PLEASE SEE ISSUE NOTE ON PAGE 6 FOR FULL DETAILS):

- The living conditions within pre-trial detention facilities are inadequate for youth.
- Young people have limited access to services and programming while in detention.
- Holding people in detention causes disruption and threatens a young person's stability when they are eventually released.
- The existing culture risk of aversion within the justice system has led to a bail crisis in Ontario.
- Ontario disproportionately relies on restrictive bail conditions, such as sureties and cash bail, in comparison to other provinces.

- The over-reliance and misuse of restrictive bail conditions creates a 'revolving door', in which persons violate their bail conditions and are subsequently charged with additional offences.
- Not enough financial resources to adequately fund correctional institution operations.
- Despite an average decline in the youth incarceration rate across Canada¹, Indigenous youth continue to be overrepresented in the justice system in a majority of provinces according to a 2016-2017 study²³.

Laidlaw Opportunity:

1. As grantees and experts are already engaged in advocacy and reform efforts in this space, Laidlaw is well positioned to provide financial support to both youth-led but more so, youth-serving organizations as they are most active and well-resourced to bring about changes to any of the above issues noted and those in the accompanying briefing note.

Education Systems

Based on conversation with CBE grantees, in 2015 and 2016 it was noted that the issue of streaming and School Resource Officers (SROs) in public high schools, disproportionately targeted youth of color. Laidlaw funded research and supported the advocacy work of grantees in successfully addressing these challenges. We understand that there are many other challenges within the education system including outdated curriculums and classroom sizes, thus we are looking for areas that we can be the most impactful as a philanthropic foundation.

Problem Definition (AS INFORMED BY OUR CBE CONVENINGS):

- It has been noted by experts, community leaders and young people that there have been frequent instances in which educators at the high-school level feel the need to involve the

¹ <https://www150.statcan.gc.ca/n1/pub/85-002-x/2018001/article/54972/tbl/tbl08-eng.htm>

² <https://www150.statcan.gc.ca/n1/pub/85-002-x/2018001/article/54972/tbl/tbl12-eng.htm>

³ <https://www.theglobeandmail.com/canada/article-nearly-half-of-youth-incarcerated-across-canada-are-indigenous/>

police for issues that rarely require that level of escalation; this reinforces a 'school-to-prison pipeline' and disproportionately affects Indigenous-youth, youth-of-color and newcomer-youth.

- The School Resource Officer program in the TDSB, implemented shortly after the Jordan Manners shooting was noted by some high school students as problematic. Some high school students were in favor of the program.
- A coalition consisting of Black Lives Matter T.O, members of Toronto Food Share and other grantees came together to lobby the TDSB and Toronto Police to successfully suspend the program.
- The issue of streaming is statistically proven to disproportionately affect youth of color and newcomer youth¹.
- As a result of the lobbying of the government by People for Education, Social Planning Toronto and many others, the issue of streaming reform is currently tabled with the new Minister of Education.
- In 2017, the five-year graduation rate was 86.3 per cent, and the four-year graduation rate was 79.8 per cent², we continue to be concerned with the challenges faced by the young people who are not able to graduate.

Laidlaw Opportunity:

1. Grantees and experts are currently engaged in reform efforts and Laidlaw is best strategically positioned to provide funding to youth-led and youth-serving groups. Such groups are difficult to identify and find in respect to remedying the above issues and it is recommended that the Foundation focuses on youth-in-care as there is greater need, less support and much clearer problem definitions (see below).

Youth In Care

The Foundation has begun to convene two separate roundtables involving frontline and expert service providers to youth in and transitioning out of the care system. It has become immediately apparent that while there has been much discussion from previous tables, little action has followed in the way of reforms, services, improvements and supports.

Problem Definition (PLEASE SEE ISSUE NOTE ON PAGE 12 FOR FULL DETAILS):

- Black and Indigenous children and youth are over-represented in Ontario’s child welfare system⁴
- A lack of funding inhibits care services providers from carrying out their duties effectively and lessens the quality of service children and youth receive.
- There is a lack of comprehensive data and knowledge sharing between organizations that work in the youth in care sector. Communication and coordination between organizations is limited.
- There are not enough opportunities for children and youth to develop life and social skills while in care.
- There is not enough focus on prevention and community supports for families in the youth-in-care system.
- Standards and quality of care in out-of-home placements are inconsistent and generally inadequate. This creates unhealthy and unsupportive environment that inhibits the healthy growth and development of young persons.
- There is a difference between what youth-in-care legislation mandates and what is happening on the ground and in practice.

Laidlaw Opportunity:

1. Laidlaw is currently convening two round-tables consisting of expert service providers to move forward with policy recommendations that can assist youth in and transitioning out of care.
2. Through careful research we have identified that one potential solution that can address multiple issues noted above would be for a centralized accountability framework that governs all of Ontario’s fragmented Children’s Aid Societies.
3. As there are not many organizations leading the charge for policy change on this topic, Laidlaw can be positioned to do so as it affects the lives of Ontario’s young people.
4. Ontario is one of the few jurisdictions without a provincial youth-in-care network, there may be an opportunity for Laidlaw to lead the charge and support the viability of this.
5. Continued and generous support of grantees and leading organizations in this space would provide for greater progress.
6. Potentially leading advocacy initiatives for policy change and oversight now that the Office of the Provincial Advocate has been dismantled would benefit the sector and Ontario’s youth.

⁴ http://www.ohrc.on.ca/sites/default/files/Interrupted%20childhoods_Over-representation%20of%20Indigenous%20and%20Black%20children%20in%20Ontario%20child%20welfare_accessible.pdf

Issue Note: Youth Justice

Issue Statement

What challenges do young people in Ontario's bail system face and what barriers and gaps in service are there for young people^[i] (18-29) who are remanded to pre-trial detention?

Background

Since the 1980s, the share of inmates on remand held in custody (rather than granted bail) across Canada has tripled. Inmates awaiting trial in provincial prisons outnumber prisoners who have been formally convicted and sentenced. In 2015/2016, 62% of the 75,319 people in adult custody in Ontario were on remand.^[ii]

Remanded individuals have been accused of a crime, but not convicted, and are thus presumed innocent until proven guilty. Many people who are held on remand will never be convicted of a crime as charges are stayed, withdrawn, or dismissed in about a third of cases in Ontario.^{[iii][iv]}

The increase in the number of people held on remand has led to delays in bail hearings and a growing backlog in the criminal justice system. As a result, an accused often waits longer for bail hearings and consequently spends longer periods of time in detention.

Within provincial prisons in Ontario and across the country, youth are grossly overrepresented. In 2016/2017, 18-29-year-olds accounted for 40% of admissions to Ontario provincial prisons, despite only representing roughly only 15% of the Ontarian population.^{[v][vi]}

The 18-29-year-old population within prisons and detention centres are not recognized by corrections services as a distinct age group with unique needs.

Because of this lack of recognition, youth in the adult system have very limited access to programs, services, and supports, particularly when compared with the accessibility of programs for sentenced prisoners in adult prisons and incarcerated youth (12-17).

Black and Indigenous young people continue to be overrepresented in admissions to custody in both youth and adult prisons. In October 2017, the Ontario Ministry of the Attorney General released a bail directive, "Judicial Interim Release", which aims to reduce pre-trial custody by emphasizing and reinforcing existing legislation. The effects of the directive, if any, are not yet clear.

Addressing the bail crisis and gaps in service provision for incarcerated young adults in Ontario will require the undertaking of both preventative and reactive measures to adequately mitigate the potential harms to young adults caused by pre-trial detention.

Key Considerations

The living conditions within pre-trial detention facilities are inadequate.

- Due to the increase in numbers of remanded persons and resulting bail hearing delays and backlogs, pre-trial detention facilities are often overcrowded, with up to 2-3 people residing to a cell designed to hold one person.
- Individuals on remand are often held in maximum-security prisons, subjected to the most severe restrictions, regardless of the crime they are accused of. They often have access to fresh air for only 20 minutes per day. Prisoners held in segregation can spend up to 23 hours per day isolated in their cells.[vii]
- Many people held in remand also suffer from mental health issues. The uncertainty of being in detention for an indeterminate amount of time can cause distress. Further, many people in provincial jails are not provided with proper, timely medical or psychiatric assessments and treatment.[viii]
- Anecdotal evidence suggests that young people may accept a plea bargain or plead guilty simply to be released, due to the uncertainty and conditions of being on remand. Many young people may not be aware of the potential cascading impact having a criminal record can have on their lives.

Young people have limited access to services and programming while in detention.

- Youth ages 18-29 are not recognized as a distinct age group within the justice system. Thus, they do not receive the specialized programming that their age group would have access to if they were in the community.[ix]
- Many remanded individuals only have access to programs and services such as medical care, urgent psychiatric care, and spiritual and religious reading materials and services.
- Because pre-trial detention is considered to be temporary and short-term, there is limited incentive to invest in programs and services such as education, recreational activities, or work programs for accused persons. The reality is that because of backlogs and delays, many young people spend months, if not years, in pre-trial detention.
- Some education-focused, community-based programming exists in detention centres in Toronto, demonstrating that programming is possible and has the ability to bring about positive outcomes for program participants.

Holding people in detention causes disruption and threatens a young person's stability when they are eventually released.

- Statistics Canada found that more than half of people on remand across Canada were held for one week or less and three-quarters were held for one month or less. These short disruptions can have devastating consequences in the lives of young people.
- When a young person is held in detention, their housing, employment, education, and childcare arrangements can be threatened. These disruptions can cause people to lose their homes or jobs, which poses significant challenges when they are released.
- A report on young adult incarceration articulated that "Involvement in the criminal justice system can disrupt a young person's progression into adult roles that are generally associated with abstaining from crime, particularly for those serving long prison sentences during young adulthood."^[x]
- The Youth Criminal Justice Act encourages the use of extrajudicial measures as an alternative to laying charges in order to limit youth involvement in the criminal justice system.^[xii]
- The justice system is, however, not required to provide extra-judicial measures or pre-charge diversion for young adults (18+) despite the fact that people continue to develop neurologically until their mid-20s.
- Additionally, correctional services are not mandated by policy to assist remanded individuals with discharge planning to help them smoothly and successfully reintegrate into the community.

The existing culture risk of aversion within the justice system has led to a bail crisis in Ontario.

- Fewer people are being released at various points of interaction with the justice system, increasing rates of incarceration. A growing body of literature suggests that the increasing remand population is partially a result of a growing culture of risk aversion.^[xiii]
- The culture of risk aversion extends from the police to the courts in Ontario. Fewer people are being released by police on a summons or promise to appear.^[xiv]
- It is worth noting is that justices of the peace, as opposed to judges, oversee effectively all bail hearings in the province of Ontario, unlike in any other province in Canada. The majority of justices of the peace in Ontario do not have a law degree or legal background. Lawyers have expressed concern about the quality of adjudication by justices of the peace.^[xv]

Ontario disproportionately relies on restrictive bail conditions, such as sureties and cash bail, in comparison to other provinces.

- During the period of observation, a study conducted by the Canadian Civil Liberties Association (CCLA) found that while B.C. and Manitoba required 0% of persons released to pay a cash bail

or secure a surety, Ontario required 4.7% of people to pay cash bail and 53.1% of people to secure a surety^[xvi] as a pre-condition for release from detention.^[xvii]

- Requiring a surety as a condition for release disproportionately disadvantages low-income accused persons. A surety (often a family member) must be financially able and willing to forego a sum of money should the accused not abide by their bail conditions. Accused persons with lower-income backgrounds stay longer in remand custody while trying to find a suitable surety.

The over-reliance and misuse of restrictive bail conditions creates a 'revolving door', in which persons violate their bail conditions and are subsequently charged with additional offences.

- As established by R v. Antic and consistent with the presumption of innocence, bail conditions must start with the least restrictive form and conditions of release. In reality, however, imposed bail conditions are often inconsistent with existing legislation.
- Evidence shows that many of the bail conditions prescribed in Ontario are not related to the initial offence, but rather are an attempt to modify undesirable character or behaviours.
- Research findings highlight that the majority of breaches while under bail supervision were related to failures to comply with release conditions, rather than committing a new offence or missing a court appearance.^[xviii]^[xix]
- Restrictive bail conditions, particularly as they relate to alcohol and drug abstinence, often lead to failure to comply charges.^[xx]

[i] For the purpose of this briefing note, "youth", "young adults" and "young persons" refer to individuals 18-29 and does not address persons 17 and under who have been accused of a crime; these youths are governed under the Youth Criminal Justice Act and are subject to different treatment under the law, while incarcerated. 18-29 year olds are not currently recognized as a distinct age group by the justice system.

[ii] Statistics Canada, "Admissions to adult correctional services, by type of supervision and jurisdiction, 2015/2016," Statistics Canada. March 3, 2017, <https://www150.statcan.gc.ca/n1/pub/85-002-x/2017001/article/14700/tbl/tbl04-eng.htm>, (accessed June 28, 2018).

[iii]Independent Review of Ontario Corrections, "Corrections in Ontario – Directions for Reform," Ministry of Community Safety and Correctional Services. September 2017, [https://www.mcscs.jus.gov.on.ca/sites/default/files/content/mcscs/docs/Corrections in Ontario, Directions for Reform.pdf](https://www.mcscs.jus.gov.on.ca/sites/default/files/content/mcscs/docs/Corrections%20in%20Ontario,%20Directions%20for%20Reform.pdf). (accessed July 2, 2018), 91.

[iv] About a third of those people have five or more bail appearances before this occurs.

[v]Statistics Canada, "Adult custody admissions to correctional services by age group," Statistics Canada. July 18, 2018, <https://www150.statcan.gc.ca/t1/tbl1/en/tv.action?pid=3510001701&pickMembers%5B0%5D=1.7&pickMembers%5B1%5D=2.1> (accessed July 20, 2018).

[vi] Ontario Ministry of Finance, "Ontario Population Projections Update, 2017-2041 – Table 9: Total Population of Ontario by five-year age group," Ontario Ministry of Finance. July 1, 2017, <https://fin.gov.on.ca/en/economy/demographics/projections/table9.html>, (accessed July 12, 2018).

[vii] Independent Review of Ontario Corrections, "Segregation in Ontario," Ministry of Community Safety and Correctional Services. March 2017, https://www.mcscs.jus.gov.on.ca/sites/default/files/content/mcscs/docs/IROC%20Segregation%20Report%20ENGLISH%20FINAL_0.pdf, 35 (access July 10, 2018).

[viii] John Howard Society of Ontario, "Unlocking Change: Decriminalizing Mental Health Issues in Ontario," John Howard Society. August 2015, <http://www.johnhoward.on.ca/wp-content/uploads/2015/07/Unlocking-Change-Final-August-2015.pdf>, (accessed May 30, 2018), 13.

[ix] Statscan (2017) reports that 18-34-year-olds make up 59% of the incarcerated population in provincial prisons, despite accounting for only 23% of the general adult population. Provincial youth programming and services in Ontario are often offered until a person turns 30, which provides justification and precedent as to why 18-29-year-olds should be recognized as a distinct age group within the justice system.

[x] The Correctional Investigator Canada and the Provincial Advocate for Children and Youth, "Missed Opportunities," Provincial Advocate. August 31, 2017, 12.

[xi] Department of Justice, "The Youth Criminal Justice Act Summary and Background," Government of Canada. August 8, 2017, <http://www.justice.gc.ca/eng/cj-jp/yj-jj/tools-outils/back-hist.html> (accessed June 30, 2018).

[xii] Youth Criminal Justice Act, Part I, Section 10.

[xiii] Police and courts try to limit the risk of an accused committing a crime while out on bail by opting to hold them in detention.

[xiv] Once arrested, an accused person should be released at the scene or police station unless police have reason to believe that doing so poses a risk to the public.

[xv] Canadian Civil Liberties Association, "Set Up to Fail: Bail the Revolving Door of Pre-trial Detention," CCLA. July 2014, https://ccla.org/dev/v5/_doc/CCLA_set_up_to_fail.pdf (accessed June 20, 2018), 20.

[xvi] There is no evidence that this increased reliance on sureties results in greater compliance with bail conditions. Indeed, despite dramatic differences in the use of sureties in British Columbia and Ontario, the two provinces have almost identical charge and conviction rates for failing to comply with a bail order. (Ibid, 37.)

[xvii] Ibid, 100.

[xviii] John Howard Society of Ontario, "Reasonable Bail?" John Howard Society. September 2013, <https://johnhoward.on.ca/wp-content/uploads/2014/07/JHSO-Reasonable-Bail-report-final.pdf>, (accessed June 20, 2018), 12.

[xix] Administration of justice offences continued to represent more than 1 in 5 cases (23%) completed in adult criminal court in 2013/2014, (Statistics Canada, "Adult criminal court statistics in Canada, 2013/2014," Statistics Canada. November 30, 2015, <https://www150.statcan.gc.ca/n1/pub/85-002-x/2015001/article/14226-eng.htm> (accessed June 20, 2018).

[xx] Of clients reporting to have issues with drugs or alcohol, 81% of them were ordered to abstain from consuming alcohol or drugs. (John Howard Society of Ontario, "Reasonable Bail?" John Howard Society. September 2013, <https://johnhoward.on.ca/wp-content/uploads/2014/07/JHSO-Reasonable-Bail-report-final.pdf>, (accessed June 20, 2018), 12.)

Glossary

Remand: the process of holding a person accused of a crime in detention until their trial (also referred to as pre-trial detention). Persons on remand are innocent until proven guilty. Many held on remand will never be convicted of a crime as charges are stayed, withdrawn, or dismissed in about a third of cases.

Surety: A surety is someone who agrees to supervise an accused person while they're released into the community on bail waiting for their criminal matter to be resolved in court. Usually this is a friend or relative.

Issue Note: Youth in Care

Background

On June 1, 2017, the Ontario government passed Bill 89, The Child, Youth and Family Services Act (CYFSA). Its overarching purpose is to "promote best interests, protection and well-being of children." For the first time, the bill places children at the centre of services and decision-making.

The Bill came into effect on April 30, 2018 and thus, it may be challenging to immediately assess how and to what extent changes in legislation will positively or negatively affect youth in care.

Bill 89, which replaced the existing Child and Family Services Act, 1990, enacted four significant changes:

- **The age of protection was changed from age 16 to age 18 to increase protection services for vulnerable youth in unsafe living conditions.**
- **There was an added emphasis on making services more inclusive and culturally appropriate for all children and youth, including Indigenous and Black children and youth.**
- **The Act puts a greater focus on early intervention, in the hopes of preventing children and youth from experiencing crisis situations.**
- **The act improves accountability and oversight practices of services providers, including CASs and other local, licensed service providers.**

While the introduction of Bill 89 makes some important strides in addressing gaps resulting from the previous legislation, there are still several issues of concern for Ontario's youth in care. The following considerations could identify specific areas in which further advocacy and action is needed and Laidlaw could play a leading role.

Key Considerations

Black and Indigenous children and youth are over-represented in Ontario's care system.

- In February 2018, the Ontario Human Rights Commission (OHRC) reported that Indigenous children and Black children were admitted into care at a rate 2.6 and 2.2 times higher than their proportion of the child population, respectively.
- Current race-based data collection measures are inconsistent and inadequate, which suggests that the scale of the problem has likely been underestimated.
- Due to a lack of cultural sensitivity, poverty and cultural differences have sometimes been conflated with neglect, which has led to the unnecessary referrals to CAS.
- The new CYFSA introduced requirements that service providers "take into account" and provide training on the unique identities of children and youth in care that must be in effect by January 1, 2019. As of yet, it is unclear what specific procedures service providers will have to comply with and how they will be held accountable. Also unknown is whether the provincial government has enhanced the capacities of service providers to comply with the new requirements.

A lack of funding inhibits youth-in-care service providers from carrying out their duties effectively and lessens the quality of service children and youth receive.

- In the 2017 budget, the Ontario government committed an additional \$134 million over four years to support new initiatives in the child welfare sector, grounded in the new CYFSA.

- Ontario's 2018 budget made commitments to make significant investments in vulnerable children and youth, but not necessarily pertaining to youth-in-care. There is concern that a lack of funding limits the capacity of organizations (including CAS) to carry out their work effectively.
- There is, however, additional concern from several organizations that the existing funding structures may not be addressing the core issues (poverty, food insecurity, etc.) that lead children and youth to become involved in the care system in the first place. Many of these organizations advocate that more funding and resources should be used to invest in prevention and supporting families.
- Regardless of where the funding is directed, there is a dearth of funding for both care services and prevention, community, and family services. Limited resources and capacity impede the ability of people in the sector to carry out their responsibilities effectively and successfully.

There is a lack of comprehensive data and knowledge sharing between organizations that work in the youth in care sector. Communication and coordination between organizations is limited.

- Supports for youth in care (and their families) are provided by a patchwork of organizations. As such, limited coordination between organizations leads to both overlaps and gaps in services.
- There is currently limited ability to follow a child or youth as they move in and out of care, or between sectors, and no way of looking at this journey holistically to facilitate service coordination, flag issues or take their full experience into context when understanding needs and making decisions.
- The Ministry of Child and Youth Services (MCYS) has developed a Child Protection Information Network (CPIN), which allows for better information-sharing between CASs, but it has yet to be fully implemented and has been inundated with problems and unanticipated costs.
- A lack of data has resulted in a deficiency of oversight and understanding about some of the larger systemic issues within CASs across the province. It has limited the ability of the sector to track outcomes.
- Despite the existence of over 600 residential care providers in the province, there is currently no online directory of services available to children and youth in care or service providers.
- Increased coordination between organizations that work in the sector could allow for sharing of knowledge regarding systemic barriers and gaps in the system and allow organizations to work collaboratively to either a) address those gaps themselves, or b) collectively put pressure on the appropriate levels of government to address systemic barriers with funding and legislation.

There are not enough opportunities for children and youth to develop life and social skills while in care.

- Children need both a sense of community and opportunities to build healthy, long-lasting relationships. There is a lack of mentorship, particularly for children transitioning or ageing out of care.
- The Residential Services Review Panel Report, “Because Young People Matter” heard that young people do not feel as though they acquire life and social skills in residential care that enable them to function independently when they eventually transition out of care.
- Additionally, residential care currently includes few programs and services targeted specifically at young people with diverse cultural and gender identities.

There is not enough focus on prevention and community supports for families in the youth-in-care system.

- Several organizations involved in the youth-in-care sector have expressed concern that there is not enough focus on prevention and family services.
- This leads to children being apprehended for reasons often stemming from poverty. Had there been earlier intervention, the situation may not have resulted in apprehension.

Standards and quality of care in out-of-home placements are inconsistent and generally inadequate. This creates unhealthy and unsupportive environment that inhibits the healthy growth and development of young persons.

- Many children and youth placed in out-of-home care are dealing with the effects of trauma and separation from their families. A high quality of care is essential for children’s healthy development. Healthy relationships with caregivers have positive effects on young people and their outcomes.
- Residential staff and standards of care are largely unregulated in Ontario. Foster and group home caregivers are required to have limited training. MCYS currently only requires training in crisis management, First Aid, Workplace and Hazardous Materials Information Systems, residential policy and procedure, and training in the use of fire extinguishers.
- Eligibility requirements for who can be a caregiver are inconsistent across the sector, varying from organization to organization. There is also no educational attainment level required to become a residential care-giver.
- There is no standardized training for caregivers on the topics of unconscious bias, cultural sensitivity, or providing care for LGBTQ2S youth.
- Enhanced mental health training for service providers and frontline is needed.

- MCYS noted that staff are limited in their knowledge and understanding of the child welfare system as a whole, which makes it difficult for them to assist young people in navigating the system. (Safe and Caring Places for Children and Youth – Ontario’s Blueprint)
- New policies regarding expectations of licensees’ residences and required training are expected to be released by MCYS on January 1, 2019.

There is a difference between what care legislation mandates and what is happening on the ground and in practice.

- The CYFSA introduced a statutory requirement that every society enter into an accountability agreement with the Minister as a condition of receiving funding.
- Though the government has implemented new accountability measures, there has historically been stark differences between legislative mandates and what happens on the frontlines and in practice in care service provision.
- This may, in part, be due to the operational organization of CASs in Ontario. Unlike most other provinces in which child protective services fall directly under the responsibility of the Ministry, CASs are individually-operated, non-profit organizations, each with their own Board of Directors.
- All CASs are governed under the CYFSA, but due to the operational structure, each CAS may interpret mandates and legislation differently, creating variation in the quality of services provided between CASs. There is little standardization of service provision across CASs.