

Income Supports for Undocumented Immigrants, Migrant Workers & Students

Individual Tax Numbers and expired Social Insurance Numbers as Access Points to Canada Emergency Response Benefit

The scope of the crisis

In 2007, the RCMP estimated that there were 500,000 undocumented residents in Canada. In the following thirteen years, Canada has seen a near doubling of temporary migrant workers and international students - many of whom don't have access to permanent residency and may end up being forced to remain in Canada without immigration status. In addition, as the situation in the United States has deteriorated for refugees and immigrants, the numbers of people fleeing to Canada has increased. Thus, the total number of undocumented residents may well be significantly higher than 500,000. In addition, there were 874,770 new temporary work, study or humanitarian permits issued in 2019, and the total number of temporary immigrants in the country is much larger. While some of these migrants have valid Social Insurance Numbers, many don't.

According to the last census, 42.9% of non-permanent residents are low-income (as compared to 12.5% of non-immigrants, and 17.9% of immigrants). Non-permanent residents are extremely vulnerable to economic crises, and a single missed paycheque can cause irreversible harm to health, safety, and future life possibilities.

Like other low-wage workers, undocumented immigrants, and migrant workers and students with expired Social Insurance Numbers, spend the majority of their income on rent, basic necessities, food and transportation. As such, they play a critical role in sustaining and growing local economies. When income disappears for the poorest, the effects are amplified across the entire economy.

To enable undocumented workers to participate in public health strategies to self-isolate, protecting themselves and others, undocumented workers need economic support just like other low wage and precarious workers.

There is a solution

Currently, many migrants with expired Social Insurance Numbers (SIN) are unable to renew their SINs due to Service Canada closures. Many migrant workers and students need to renew their immigration permits first, and then apply for renewal of SIN. However, immigration permit renewal has slowed down substantially due to COVID-19. This includes difficulty in obtaining documents by applicants, closure of biometric facilities necessary for applications, and overall slow downs at government processing centres. There is a simple fix, **the federal government should allow applications for Canada Emergency Response Benefits (CERB) with expired SIN.**

For, undocumented residents, **the federal government must expedite the issuance of Individual Tax Numbers.**

Benefits of the Individual Tax Number

The Individual Tax Number (ITN) is a unique number that the Canada Revenue Agency (CRA) uses to identify workers for tax purposes if they aren't eligible for a SIN. Already workers with ITNs are eligible for benefits from CERB. This is the most pragmatic and swift solution to a complex problem. The ITN is a taxation mechanism that already exists and as such could be easily extended to workers who do not have access to SINs. This would be an efficient and cost effective mechanism for addressing the urgent need for income supports.

Furthermore, ITNs are already used by many immigrants, including undocumented migrants, to pay taxes. The expansion of the use of ITNs would allow more workers to contribute to Canada's tax base going forward and have a positive impact on the long-term health of the tax system.

The ITN mechanism would have the support of most migrant and undocumented groups in Canada, once the following changes are implemented.

Changes required to Individual Tax Number system to ensure protections for undocumented workers

The application process for an ITN as it currently exists would need to be modified to meet the needs of the current crisis. Specifically, the following changes need to be made:

1. **Broaden acceptable documentation requirements:** Currently, the ITN application process requires a valid certified copy of passport or driver license. An ITN should be provided to workers who have any valid **or** expired immigration documentation (work permit, study permit, tourist visa) or any valid or expired passport or copy of passport (non-certified). For people who don't have even these documents, a letter from a community organization attesting to their identity should be acceptable. Currently, many undocumented workers don't have access to valid documents. Fear, financial constraints, or government office closures due to COVID-19 have made it nearly impossible to renew documents.
2. **Allow applications by phone or online:** Currently, ITNs can only be applied for by mail. This process is simply too slow and inaccessible during the pandemic. ITN applications should be available by phone or online so that emergency economic support can reach families in need as quickly as possible. These applications must also be available in multiple languages.
3. **Guarantee no information sharing with immigration enforcement:** Information collected for tax purposes or for issuance of emergency economic support must not be shared with immigration enforcement. Without this guarantee, workers are unlikely to risk applying for income support, defeating the purpose of these emergency measures. The government has already instituted a temporary moratorium on deportations and has made efforts to release immigration detainees in recognition of the public health consequences of such actions during a pandemic. An information firewall around the ITN/emergency income relief process is essential for these same reasons. In addition, this firewall policy must be made publicly available, and specific mechanisms must be developed to ensure it remains in place past the duration of the current pandemic.

In addition, the **Canada Emergency Response Benefit cheques must be endorsable** so that undocumented workers without bank accounts can still get cheques cashed. This means either issuing cheques of \$1,000 each for CERB, or working with banks to ensure that \$2,000 endorsed government cheques can be cashed.

In the interests of finding an expedient and effective solution to the income crisis affecting hundreds of thousands of undocumented workers and support public health strategies on COVID-19, we would welcome the opportunity to discuss the implementation of this proposal at your earliest convenience. Please contact Karen Cocq at 647-970-8464 or karen@migrantworkersalliance.org to set up a meeting at your earliest convenience.

On behalf of the Migrant Rights Network, which includes:

1. Migrant Workers Alliance - Niagara, Ontario
2. Cooper Institute and the Prince Edward Island Action Team for Migrant Workers' Rights
3. Radical Action with Migrants in Agriculture (RAMA), Okanagan region, BC
4. Fuerza Migrante, Vancouver, BC
5. Migrant Workers Alliance for Change
6. Asian Community Aids Services
7. Butterfly (Asian and Migrant Sex Workers Support Network)
8. Caregivers' Action Centre
9. Chinese Canadian National Council Toronto
10. Centre des travailleuses et travailleurs immigrants
11. Collaborative Network to End Exploitation
12. Durham Region Migrant Solidarity Network
13. FCJ Refugee House
14. GABRIELA Ontario
15. Fuerza Migrante Vancouver
16. Income Security Advocacy Centre
17. IAVGO Community Legal Clinic
18. Migrant Worker Solidarity Network - Manitoba
19. Migrant Students United
20. Migrant Workers Alliance for Change
21. Migrante Alberta
22. Migrante BC
23. Migrante Canada
24. Migrante Manitoba
25. Migrante Ontario
26. No One Is Illegal – Halifax
27. No One Is Illegal – London
28. No One Is Illegal - Toronto
29. No One Is Illegal – Vancouver
30. Northumberland Community Legal Centre
31. OHIP For All
32. OCASI – Ontario Council of Agencies Serving Immigrants
33. PCLS Community Legal Clinic
34. S4 Collective
35. South Asian Legal Clinic of Ontario
36. Sanctuary Health
37. Solidarity Across Borders
38. UNIFOR
39. UFCW
40. Vancouver Committee for Domestic Worker and Caregiver Rights
41. Workers Action Centre.
42. Workers United