**DEADLINE FOR WRITTEN SUBMISSION: 11:59PM FRIDAY, APRIL 6, 2018**

***By e-mail:*** [IRCC.COMMConsultations-ConsultationsCOMM.IRCC@cic.gc.ca](https://cicsmart.com/email/mailresponse_V4.asp?tid=2241&em=3684126&turl=mailto:IRCC.COMMConsultations-ConsultationsCOMM.IRCC@cic.gc.ca?subject=IRCC%20Caregiver%20Pilot%20Programs&body=Submission%20guidelines%0A%0APlease%20include%20your%20name%20and%20the%20name%20of%20your%20organization%20in%20your%20submission.%0APlease%20send%20your%20answers%20in%20TXT%2C%20RTF%2C%20DOC%20or%20PDF%20file%20formats.%0ALimit%20your%20submission%20to%20a%20maximum%20of%2010%20pages%20(12-point%20font)." \t "_blank).

**Submission to Immigration, Refugees and Citizenship Canada Caregiver Pilot Program Consultations**

[Introduce your organization (or yourself) and why Caregiver law reform is important to you / people you work with.]

A century of experience has demonstrated that caregiving labour is an ongoing permanent need in the economy. More than 60 years of caregivers’ experience with temporary labour migration to Canada has demonstrated consistent, well-documented, widespread problems of exploitation and abuse by employers and recruiters. Repeated reviews by Parliamentary Committees (most recently the 2016 HUMA Committee hearings), as well as academic and community-based research have demonstrated that this exploitation is rooted in the vulnerability that is created by the terms of Canada’s temporary labour migration program itself.

In addition, caregivers over the past four decades of the program have suffered from the ‘two-step’ immigration system that requires them to finish their employment contracts before being allowed to apply for permanent residency. This has led to profoundly damaging and lasting impacts on the physical and mental health of caregivers and their families. Years of family separation can cause intergenerational conflicts between caregivers and their children as well as family breakdown.

The time has come to make real, meaningful reforms that ensure decent work and security in this core area of the labour market. Caregivers are united in demanding:

1. A comprehensive and transparent consultation process to reform the Caregiver Program.
2. A new Federal Workers Program - Caregiver Stream that provides caregivers with permanent status on entry and family unity.
3. Reforms to protect caregivers who are already in Canada and in the backlog to ensure that no one is left behind.

These reforms will involve allowing caregivers to come to Canada with their families; eliminating the backlog in caregivers’ permanent residency applications; removing the ‘excessive demand’ provision in the *Immigration and Refugee Protection Act* (IRPA); regularizing the status of caregivers who have become undocumented; developing immigration criteria that are consistent with what is needed to do the job; and putting an end to the second medical and to excessive educational and language requirements re-introduced in 2014. We particularly urge the creation of an open work permit program.

[Our organization / I] fully support(s) the recommendations put forward in the submissions by: Caregivers Action Centre, Caregivers Action Centre, Caregiver Connections Education and Support Organization CCESO, Committee for Domestic Workers and Caregivers Rights, GABRIELA Ontario, Migrant Workers Alliance for Change and Migrante Ontario.

Sincerely,