

Human Rights Legal Support Centre

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1. Introduction

The Human Rights Legal Support Centre (“Centre”) has compiled these materials to assist members of the public who would like to participate in the Ontario Human Rights Review currently being conducted by Andrew Pinto. Mr. Pinto, an Ontario lawyer who has practiced human rights and employment law for 16 years, was appointed by the Attorney-General to undertake a review of “the implementation and effectiveness of the changes” to the *Human Rights Code* (“Code”) that came into full effect on June 30, 2008. Under the amendments to the *Code*, the Centre was created to provide legal and support services to individuals whose rights under the *Code* have been infringed.

This document will be available on our website in January 2012 at www.hrlsc.on.ca. Where supplementary materials are available, this is indicated in the document. We hope that this package will assist the public in evaluating the effectiveness of Ontario’s new human rights system, and the work of the Centre in particular.

First a note of caution: the statistical information available on our services is limited by the fact that the Centre is currently implementing its first full case management system. Our most reliable statistics are for the first six months of the current fiscal year (April 1, 2011 to September 30, 2011). A fuller picture of our work will become available after implementation of the final phase of our new system, early in 2012.

This information is available in different formats. Please contact Sophie Idsinga at sidsinga@hrlsc.on.ca if you have any difficulties in accessing this document.

2. What is the Centre’s mandate under the Code?

The Human Rights Legal Support Centre (HRLSC) opened its doors on June 30, 2008. The Centre is funded by the Government of Ontario to provide legal and support services to individuals whose rights under the *Code* have been infringed, including in particular “legal services in relation to applications and proceedings before the [Human Rights] Tribunal [of Ontario]”.

The Centre does not charge a fee for its legal services.

The other two human rights agencies in Ontario are the Human Rights Tribunal of Ontario (“Tribunal”) and the Ontario Human Rights Commission (“Commission”).

Please go to www.hrto.ca and www.ohrc.on.ca for information on the mandate and work of the Tribunal and the Commission.

3. How does the Centre provide legal services across the province?

The Centre is headquartered in Toronto and responds to inquiries from all regions of the province. Over 60% of inquiries to the Centre are from outside the Toronto area. The Centre's lawyers attend hearings and mediations in all regions of the province. The Centre has undertaken public outreach activities in communities in all regions of the province.

The Centre has 10 paralegal staff, 21 full time and 4 part-time lawyers on staff, including lawyers located in Guelph, Windsor, Thunder Bay, Ottawa and Sault Ste. Marie.

A complete listing of staff positions is attached to this document or available on request to the Centre at: ASt.John@hrlsc.on.ca.

4. What services does the Centre provide?

4.1 Human Rights Helpline: Immediate Legal Information and Assistance

The Centre operates a telephone helpline that provides immediate legal information and assistance to members of the public who have experienced discrimination. In its first three (3) years of operation, from June 20, 2008 to June 30, 2011, the Centre answered 72,200 inquiries from members of the public. This includes a small number of inquiries received by letter, email and in-person. The Centre has a staff unit comprised of 8 full time Human Rights Advisors who answer public inquiries, assisted by two (2) additional staff who act as Human Rights Advisors on a part time basis.

4.1.1 What legal information and assistance is provided by Human Rights Advisors?

Not all inquiries to our Helpline are about infringements of *Code* rights. The Centre gets regular inquiries from individuals who are seeking general information, not legal assistance. For example, Human Rights Advisors respond to questions about non-*Code*-related workplace harassment or about anti-discrimination policies on the Ontario Human Rights Commission website.

Significantly, approximately 30% of inquiries are seeking legal assistance in resolving an issue or dispute that falls *outside* the *Code*. Often, our Human Rights Advisors can assist the caller in identifying the nature of their legal problem and in directing them to

another service, such as the Office of the Worker Advisor, a community legal clinic or the Employment Standards Branch.

In the period covered by our last Annual Report (April 1, 2010 to March 31, 2011), the Centre responded to 25,793 inquiries, up from 24,905 inquiries the previous year. Below is the breakdown of our telephone inquiries for 2010/11.

The Centre responded to:

- 16,378 inquiries seeking legal advice or assistance relating to an experience of discrimination, including inquiries about a human rights application or proceeding before the Tribunal;
- Approximately 7,000 inquiries about legal disputes that fall *outside* the *Code*;
- Approximately 2,000 inquiries seeking general information about the human rights system or about discrimination;
- Approximately 400 inquiries were unrelated to human rights.

4.1.2 What is the breakdown of Code-related inquiries?

In 2010/11, of the 16,378 inquiries that sought assistance with respect to a human rights issue, the highest volume of inquiries – over 80% - were from individuals seeking help in figuring out if they had experienced discrimination. Many individuals called the Centre on more than one occasion to discuss their situation and legal options before deciding to file an application.

Here is the breakdown:

82% were inquiries from individuals wanting legal advice about an incident of discrimination, including information on the human rights process;

7% were inquiries from individuals seeking assistance or representation in completing and filing an application to the Tribunal;

5% were inquiries from individuals who wanted assistance or representation at an upcoming mediation before the Tribunal;

3% were inquiries from individuals who wanted assistance or representation at an upcoming hearing before the Tribunal;

2% were inquiries from individuals who wanted assistance in enforcing an order of the Tribunal or representation in a reconsideration or judicial review application challenging a decision of the Tribunal.

A breakdown of the grounds of discrimination cited in inquiries can be found at the end of this document.

4.2 Legal Services – maximizing the range and accessibility of services while prioritizing service for disadvantaged applicants

4.2.1. Legal Assistance or Full Representation

The Centre has adopted an “unbundled” service model that maximizes the number of applicants and potential applicants who receive our assistance before and during the Tribunal process. Legal services are provided on a stage-by-stage basis – in pre-application settlement negotiations, in filing an application, at mediation and hearings and in enforcement or judicial review proceedings.

This allows us to match the level and extent of service at each stage to a number of factors including the needs of the individual, the merits of the claim and the complexity of the evidentiary and legal issues.

In the typical situation, an individual is given legal assistance in filing their application and then full representation at mediation. The Centre has settled well over 80% of its mediations. At the hearing stage, we represent many new individuals who approach the Centre for the first time when their application is going to hearing.

In 2010/11, our lawyers provided legal services to 1,830 individuals at one or more stages of the Tribunal's process.

For more information about how the Centre makes determinations on the level and extent of legal services offered on a case-by-case basis, see our *Service Eligibility Guidelines* on our website. Also see SERVICE ELIGIBILITY QUESTIONS AND ANSWERS, an information sheet attached to this document or available by email request to the Centre at: ASt.John@hrlsc.on.ca.

4.2.2 Priority access for disadvantaged applicants

Under the *Code*, the Centre's services are not restricted to individuals who meet prescribed criteria. However, in keeping with our *Service Eligibility Guidelines* and our *Strategic Plan* (also posted on our website), the Centre has managed its limited resources to give priority service, including representation, to individuals and groups

who would face heightened barriers in navigating the human rights process without legal representation. In giving enhanced access on the basis of particular disadvantage, the Centre does not give priority to any ground of discrimination.

4.3 Stage-by-stage Services – the right legal service at the right time

4.3.1 Application Stage Legal Services

Human rights applications are now available on the Tribunal website and most individuals who contact the Centre are able to complete and file their application with the assistance of our legal staff. If the individual is unable to complete the form even with our assistance, the Centre will complete and file on the individual's behalf as counsel of record.

The Tribunal has rejected as incomplete only a very small number of the applications that are filed annually – we estimate that less than 2%, of the more than 10,000 applications filed to date, have been rejected. If an application is missing information, the Tribunal will correspond with the applicant to indicate what additional information needs to be provided. Our legal staff will assist applicants in providing the additional information required by the Tribunal.

In the first six (6) months of this fiscal year (April 1 to September 30, 2011), the Centre's lawyers provided legal services to 753 individuals, including an assessment of the strength of their claim; assistance in negotiating a settlement before filing an application, where appropriate; and assistance in drafting the application to the Tribunal.

During the same 6-month period, 56 individuals received assistance from our lawyers by attending one of our evening "application clinics".

In this six (6) month period, the Centre directly filed 60 applications as counsel on behalf of the applicant.

In 2011/12, based on our numbers to date, our lawyers will provide legal services to approximately 1,600 individuals in filing a human rights application or in seeking redress for discriminatory treatment before filing an application to the Tribunal.

4.3.2 Mediation Stage Legal Services

The second highest demand for our legal services is at the mediation stage. In the 6-month period to September 30, 2011, our Human Rights Advisors provided advice in

response to 452 inquiries from 271 individuals about mediation at the Tribunal. Every individual who wanted legal assistance with an upcoming mediation was scheduled to meet with one of our lawyers. Our lawyers met with 215 applicants at the mediation stage.

When an individual with an upcoming mediation meets with one of our lawyers, they will receive a range of legal services including, at minimum, a legal assessment of merits; advice on range for settlement; relevant Tribunal decisions; procedural advice.

Many applicants who contact the Centre are highly educated and have access to legal and other resources in taking their case to mediation at the Tribunal. In keeping with our policy of giving priority to clients who are not able to self-represent, the Centre's lawyers provided legal services, but not full representation to about 70 applicants at the mediation stage in this 6-month period.

The Centre's lawyers attended over 145 mediations in the six (6) month period and were successful in settling over 80% of the mediations attended.

Although there is no way for the Centre to track the results achieved by self-representing applicants at mediation, we did receive reports back from many of the 70 individual who self-represented with our assistance. All our feedback to date has been positive.

We can give a projected picture of our mediation-stage services for 2011/12, based on our numbers to date:

- Our Human Rights Advisors will provide legal assistance to about 540 individuals who have questions about the Tribunal's mediation process.
- Our lawyers will provide legal services to approximately 430 individuals, including 290 applicants who will be fully represented at mediation.

4.3.3 Hearing Stage Legal Services

Many applicants call the Centre to request assistance for the first time when their application reaches the hearing stage at the Tribunal. In the six (6) month period from April 1, 2011 to September 30, 2011, our Human Rights Advisors provided assistance in response to 270 inquiries from 170 individuals seeking advice with respect to pre-hearing disclosure, pre-hearing motions and hearing preparation. The Centre has a detailed guide to the Tribunal's hearing process posted on its website.

The Centre's lawyer met with every applicant who requested legal assistance or representation at their hearing. At minimum, each individual was given a legal assessment of the merits of their case as well as advice on the disclosure, evidence and remedies. When our lawyers conclude that a case is straightforward and the applicant is well-able to self-represent, they provide detailed advice on presentation of evidence; what witnesses to call; scope of their own testimony; and the range of possible financial compensation. There is a comprehensive guide to the hearing process on our website.

A review of substantive Tribunal decisions released over a 10-month period in 2010 showed that in every case where the Centre supported a self-representing applicant, the applicant was successful at their hearing.

In this 6-month period, the Centre was retained in 96 applications at the hearing stage.

Each year, almost 70% of our hearings settle just before the hearing or on the first day of hearing.

The Centre's lawyers attended 18 hearings in the first six (6) months of this fiscal year.

By way of comparison, our lawyers completed 30 hearings on the merits in 2010/11.

4.4 Other Legal Services

The Centre also represents applicants in reconsideration applications, judicial review applications, enforcement proceedings and interventions before the Tribunal. For more information on this aspect of our work, see OTHER LEGAL SERVICES, an information sheet attached to this document or available by email request to the Centre at: ASt.John@hrlsc.on.ca.

5. Testing our record: analysis, feedback, complaints

5.1 How do self-represented applicants fare, with our legal assistance?

The Centre investigated its record in providing legal services, up to full representation, to applicants with a hearing before the Tribunal. We examined every final substantive decision on the merits by the Tribunal during a ten-month period in 2010. With each decision, we examined our records to determine if we had provided legal services to the applicant. Here is what we found:

- 67% of all applicants in the decisions had received legal services from the Centre before their hearing;

- 29% had never contacted the Centre for legal services before their hearing;
- 1% contacted the Centre for the first time after their hearing.

When we looked at the decisions where the applicants were **successful** in proving discrimination, we found that:

- 33% were represented by the Centre;
- Over 50% received legal services (but not full representation) from the Centre;
- Remaining applicants were represented by a lawyer or were themselves a lawyer.

When we looked at the decisions where the applicants were **unsuccessful** in proving discrimination, we found that:

- 10% were represented by the Centre
- 40% had never contacted the Centre
- Remaining applicants had received legal services from the Centre including, in every case, a negative assessment of the merits of their application.

This means that there were no applicants who lost at their hearing after we had provided them with self-help advice and a positive assessment of their case. Our staff did a good job of identifying applicants who were able to self-represent and then did a good job in providing them with the tools and information needed to win their case.

5.2 Does the Centre get complaints from individuals if they are not fully represented by the Centre at their hearing or mediation?

If an individual is unhappy with the service provided by the Centre, including a decision to not provide further legal assistance or representation, he or she is informed of the right to make a complaint to the Centre in accordance with the *Public Complaints Policy* on our website: <http://www.hrlsc.on.ca/en/policies.htm>. Complaints can be made in writing or orally. A member of staff has been designated as a “Complaints Officer” to assist individuals who want to complain about service and need assistance to do so.

In 2010/11, the Centre received 8 complaints; all but one complaint were resolved at the staff level. In the past 3½ years, only 2 individuals have decided to take a complaint to our Board of Directors.

The Centre has received hundreds of thank you messages from applicants, many of whom received legal services but not full representation. Excerpts from those thank you notes are included in our Annual Reports.

For more information on our complaints policy, see INFORMATION ON PUBLIC COMPLAINTS, an information sheet attached to this document or available by email request to the Centre at: ASt.John@hrlsc.on.ca.

5.3 Feedback from clients and community stakeholders

In September 2010, the Centre conducted two surveys as part of its strategic planning process: a client satisfaction survey of all closed representation files during a defined period and a survey of sixty-one (61) stakeholder organizations across the province (2 of the 61 stakeholder organizations were umbrella bodies representing member agencies).

Our client satisfaction results showed that 88% rated our service as “very good” and 8% as “good”. 94% of responding clients reported satisfaction with the service received from their lawyer. 89% reported satisfaction with the outcome of their hearing or mediation.

Forty-five (45) stakeholder organizations responded to our survey. 91% of responding organizations were aware of the Centre and 77% were satisfied or very satisfied with our services, while 3% were not satisfied. The responses identified “knowledgeable staff” as a strong point, as well as the willingness of our staff to be accessible for consultations with community organizations. The difficulty in accessing our telephone inquiries line was identified as a key weakness in our service.

6. Taking a broad lens: public interest remedies and systemic discrimination claims

Ontario’s human rights system can only be considered effective if it can deliver public interest remedies that will provide protection to the broader community affected by discrimination, not just the few who are willing to start a legal action. This is tied to the capacity of the system to deal effectively with applications that raise issues of systemic discrimination.

The Centre seeks public interest remedies in all its cases and has taken up several systemic discrimination cases that are currently working their way through the Tribunal process.

6.1 Public Interest Remedies

Under the *Code*, when the Tribunal finds that discrimination has occurred in a workplace or service setting, it can order the employer or service provider to take steps to eliminate the circumstances, practices or policies that led to the discrimination or allowed it to continue. This is called a public interest remedy.

The 2006 amendments gave the Commission the right to launch an application for a public interest remedy in its own name. As well, the Tribunal gained the authority to order a public interest remedy whether or not it was requested by the applicant. Most importantly, the higher volume of claims now filed each year, and the increased number of hearings under the new system, have together produced a very significant increase in public interest remedies, either negotiated at mediation or ordered by the Tribunal.

Notably, the Tribunal is currently receiving over 3000 new applications per year, as compared to an average of 2400 new complaints filed at the Commission each year, with less than 150 complaints referred to the Tribunal for mediation and hearing in a typical year. The Tribunal issued 107 final substantive decisions in 2010/11, as compared to an average of about 10 final decisions per year before the reforms. A review of decisions on CanLii shows that public interest remedies are very frequently ordered by the Tribunal. Public information is not available on the frequency of public interest remedies in settlement agreements, but see below for information on the Centre's success in negotiating public interest remedies at Tribunal mediations.

For more information on the increase in human rights claims and decisions under the new system, see BEFORE AND AFTER: MORE HUMAN RIGHTS CLAIMS; MORE DECISIONS, attached to this document or available by email request to the Centre at: ASt.John@hrlsc.on.ca.

The Centre has been asked if we are achieving broad public interest remedies at mediations and hearings. We are. The Centre always advises applicants to seek a public interest remedy in filing, settling and litigating their human rights application. Examples of the public interest remedies that the Centre achieved at litigation or in settlement negotiations are included in our Annual Report each year. A summary of our work in this area is set out below.

6.1.2 Public interest remedies at hearings

In litigating applications before the Tribunal in 2010/11, the Centre achieved a public interest remedy in 70% of its successful decisions, including orders:

- requiring an employer to take human rights training provided by the Commission;
- requiring a service provider to retain at their own expense a qualified consultant to review practices and make recommendations concerning accommodation of children with disabilities in all the respondent's programs;
- requiring a police service to develop training materials for the investigation of harassment, discrimination and reprisal complaints in consultation with a human rights expert; and
- requiring an employer to retain an independent human rights expert to develop a human rights policy and a procedure for harassment complaints.

In addition, the Centre has won, at hearings, financial compensation for applicants totalling in excess of \$346,000.

6.1.3. Public interest remedies in settlements

Examples of public interest remedies negotiated by the Centre in settlement agreements over the past three years include:

- In response to allegations of disability-based discrimination in employment, a national retailer agreed to develop a country-wide accommodation policy and to train its human resources and management staff in all Canadian locations;
- In response to allegations of discrimination in employment based on race and ethnic origin, a telemarketing company agreed to distribute a memo to all existing employees clarifying that discriminatory or harassing statements by customers on the basis of race, place of origin, ethnic origin or any other prohibited grounds of discrimination will not be tolerated by the company. Also agreed to conduct a training program and establish an internal process for employees to use when subjected to discriminatory or harassing conduct;
- In response to allegations of discrimination in housing on the basis of disability, a non-profit housing provider agreed to remove mobility barriers in common areas of a multi-unit building and to implement and train staff on a new accommodation policy (with complaint forms posted on its website and 30 day deadline for response) within 6 months;
- In response to allegations of sexual harassment in a workplace staffed by new immigrants, a company agreed to implement and train all staff on a human rights policy (including complaint mechanism). Also agreed to conduct information sessions for employees about the new policy in their own languages;

- In response to allegations of discrimination in services based on disability, a police service agreed to deliver regular staff training on meeting the needs of the deaf community, as well as a new monitoring system in which all occurrences involving deaf persons are reviewed;
- In response to allegations of discrimination in services based on place of origin and ethnic origin, a store agreed to develop a human rights policy to include issues specific to immigrants. Agreed to post notice of the policy and the complaints process in the store;
- In response to allegations of harassment based on sexual orientation, a call centre agreed to retain an external consultant to provide human rights training for supervisory employees relating to harassment in the workplace. Agreed to deliver training in-house annually.

In 2010/11, an estimated 75% of our settlements achieved a public interest remedy; negotiated financial compensation exceeded \$300,000. A more complete picture of our negotiated settlements will be available in 2012 when our new case management system is fully implemented.

6.2. More systemic discrimination cases

The term “systemic discrimination” is used to describe a pattern of discriminatory behaviour, policies or practices that are part of the structure of an organization or system, and which create or perpetuate disadvantage for individuals.

The Centre has provided representation on many applications that raise issues of systemic discrimination. Examples include:

- Applications to challenge the absence of accommodation measures in services for persons in the deaf community;
- Applications to challenge discriminatory zoning;
- Applications to challenge police practices and racial profiling by police;
- Applications to challenge structural bias, based on race, in promotion policies of large employers;
- Applications to challenge school board policies affecting transgendered students;
- Applications to challenge employment policies affecting the responsibilities of families with children;
- Applications to challenge employment policies affecting immigrant workers, migrant workers and older workers.

Because systemic cases often require expert evidence, the Centre has been asked whether it has the ability to retain expert witnesses where necessary to prove discrimination. An expert witness is a person who is recognized by the Tribunal to have expertise in a special area at issue in a hearing, including scientific, social science or technical areas of evidence. For example, actuarial evidence might be required in a hearing about a discriminatory provision in an insurance policy. Expert witnesses generally charge a fee for preparing a report and for testifying at a hearing.

The Centre has a budget for expert evidence and has retained experts in every case in which expert evidence was required. In 2009/10, we used expert evidence in 14 cases. In 2010/11, we retained experts in 9 cases. In one instance, we asked a client with significant financial means to share the cost of the expert's fee.

7. Is the Centre able to respond to all the inquiries on its telephone advice line?

Since commencing operation, the Centre has faced a high volume of calls to its telephone inquiries helpline that has exceeded our capacity. In the past three years, many callers have abandoned their calls before the Centre is able to answer.

The Centre increased the number of answered calls by more than 21% in its first two (2) years of operation without increased resources. However, over the same period, the overall number of calls increased by 14%, reducing the impact of our improved efficiency.

In 2008/9, the Centre was able to answer 52% of incoming calls; in 2009/10, the Centre answered 57% of incoming calls; in 2010/11, the Centre answered 60% of incoming calls. The current response rate is 72%.

Two recent developments enhanced our ability to answer a higher volume of calls:

- Effective September 2011, a new partnership with Osgoode Hall Faculty of Law has provided the Centre with 6 law students per term, 4 days per week, as part of a new intensive clinical legal education programme:
- Effective November 16, 2011, a new telephone system was implemented with special funding from the Ministry of the Attorney-General. The new system gives callers more options and provides ongoing information on the caller's place in the waiting queue.

In the first month after introduction of the new phone system - November 16 to December 16, 2011 - the call response rate increased to 72%. This is a significant improvement and compares with the rate at which the Commission was able to answer

its inquiries in the years prior to the 2006 amendments. For example, the Commission's 2005/6 Annual Report states that the response rate was 77%.

Call volumes and wait times have varied very significantly from day to day, week to week and month to month throughout the past three years. In November 2011, the average wait time was 10.44 minutes.

8. How does the Centre make the public aware of its services?

The mandate of the Centre does not include public education or community outreach – this is now the responsibility of the Ontario Human Rights Commission. However, in order to bring our services to the attention of communities that experience discrimination, the Centre has undertaken outreach activities in communities that appear to be underutilizing our legal services. The Centre does outreach through collaboration with partner organizations, including community, labour and legal or advocacy organizations, that provide human rights advice and referrals to the Centre.

Some of the organizations that the Centre has worked with to promote human rights are:

- Anishnawbe Skills Development Program (Thunder Bay)
- Arab Community Centre
- ARCH Disability Law Centre
- Conservatorio de Mujeres
- Community Living Toronto
- COSTI settlement services
- Elizabeth Fry Society
- Health Fair for Immigrant Workers (Harriston)
- HIV and Aids Legal Clinic of Ontario (HALCO)
- Job Opportunity Information Network (JOIN) for Persons with Disabilities
- Justice for Migrant Workers
- Metropolitan Action Committee on Violence Against Women and Children (METRAC)
- Newcomer Centre of Peel
- Ontario Native Women's Association
- Ontario Network of Injured Workers
- Thunder Bay People United for Self Help
- Workers Action Centre.

As well, the Centre has undertaken a proactive media strategy to bring our services to the attention of the public. Publicity generally leads to an immediate increase in demand for services and a greater awareness among respondents about their legal obligations under the *Code*.

In 2010/11, the Centre issued 4 media releases and 1 media advisory as follows:

- October 12, 2010: Toronto Police failed to protect officer from sexual and racial harassment and conducted flawed investigation
- July 13, 2010: Tribunal awards \$20,000 to employee fired after cancer diagnosis
- April 25, 2010: Ontario Athletic Association revises gender equity policy
- April 13, 2010: Unanimous Council decision wards off legal action - Mayor urges province-wide action (joint media release with City of Sarnia)
- April 8, 2010: City of Sarnia revokes anachronistic by-laws targeting disabled

In 2010/11, legal cases handled by the Centre received 71 media hits. One story that got considerable attention on television news programs concerned the firing of a woman because she wore a hijab.

The Centre is also taking its stories to community media. This year, the Centre's work has received substantial attention in Aboriginal community media as a result of a successful application brought by an Aboriginal woman against the Ontario Government. Publications reporting on this case included:

- Thunder Bay Chronicle
- Wataway News
- Anishinabek Nation News
- Aboriginal Television Network
- Aboriginal Voices Radio
- Turtle Island News
- Tekawennake News
- The First Perspective.

9. Has the Centre prepared Annual Reports?

The Centre has been asked if it has prepared Annual Reports each year as required by the *Code*.

Yes, the Centre has provided the Attorney-General with an Annual Report each year. To date, our Annual Reports have not been released by the Government of Ontario.

10. Audit of Financial Statements

The Centre has been asked if it has been the subject of a Minister's audit as provided for in the *Code*.

The Centre's financial statements are subject to an annual audit and are attached to our Annual Report submitted to the Attorney-General each year. The Centre has not been subject to any other audit by the government.