# Draft Policy for Consultation Indigenous Verification Policy Feedback can be sent to Policy@Mun.ca

Principle: Memorial University is committed to Indigenization and reconciliation with Indigenous Peoples. This commitment was formalized through the creation and ongoing implementation of the Strategic Framework for Indigenization 2021-2026. The Strategic Framework responds to the Truth and Reconciliation Commission (TRC) report in 2015 and the subsequent adoption of Universities Canada's Principles on Indigenous Education. Additionally, the University recognizes the right to self-determination of Indigenous communities, nations, and/or governments per Section 35 of the Canadian Constitution, the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), and the TRC. Memorial University recognizes the Indigenous right to determine their own membership/citizenship in accordance with their own governance, customs, traditions, and procedures. Consistent with Indigenous protocols of engagement and relationship building, one who identifies as Indigenous must share who they are and the living community to which they belong.

**Purpose**: To provide a framework for verifying Indigenous membership/citizenship at Memorial University, in a manner that respects Indigenous protocols and practices.

Scope: This policy governs the verification of Indigenous membership/citizenship at all Memorial campuses, across all units. All members of the university community share the responsibility for upholding the policy to protect Indigenous space (e.g. Indigenous specific positions, funding, scholarships, etc.) for Indigenous people at Memorial University. The policy is applicable to any opportunity within the University that is specifically set aside for, or takes into consideration, Indigenous membership. This includes but is not limited to: hiring for staff and faculty positions; designated seats for Indigenous students; awards, scholarships, fellowships, bursaries, and funding opportunities slated for Indigenous people; opportunities of advantage such as material gain or reputational benefit. The policy is applicable to all members of the University community, including but not limited to students, researchers, employees, members of governing bodies, Elders, Knowledge Keepers, cultural advisors, and persons entering into relationships with the University.

#### **Definitions:**

American Indian, Alaskan Native, Native Hawaiian: Under U.S. law and federal regulations, an 'American Indian' refers to "...any individual who is a member or a descendant of a member of a North American tribe, band, Pueblo or other organized group of native people who are indigenous to the Continental United States, or who otherwise have a special relationship with the United States or a State through treaty, agreement, or some other form of recognition. This includes any individual who claims to be an Indian and who is regarded as such by the Indian tribe, group, band, or community of which he or she claims to be a member" (Title 45 CFR § 1336.10 – Definitions).

'Alaskan Native' refers to a person who is an Alaskan Indian, Inuit, or Aleut, or any combination thereof. "The term also includes any person who is regarded as an Alaskan Native by the Alaskan Native Village or group of which he or she claims to be a member and whose father or mother is (or, if deceased, was) regarded as an Alaskan Native by an Alaskan Native Village or group" (Title 45 CFR § 1336.10 – Definitions).

'Native Hawaiian' refers to "an individual any of whose ancestors were natives of the area which consists of the Hawaiian Islands prior to 1778" (Title 45 CFR § 1336.10 – Definitions).

<u>Citizenship/Membership</u>: are used to describe an individual's relationship to a living community. Many Indigenous Peoples emphasize their existence as nations. Those who emphasize their nationhood, generally prefer to use the term citizenship. That said, the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) uses the term membership. This policy uses both terms interchangeably.

<u>First Nation:</u> refers to the Indigenous Peoples of Canada who are neither Inuit nor Métis. The term can be used to refer to a single band or the plural First Nations for many bands. The term is also used to refer to federally recognized communities in the place of the term reserve. This term came into common usage in the 1970s to replace the term 'Indian' and 'Indian band' which many find offensive.

<u>Frivolous, vexatious, or extraneous reporting</u>: 'Frivolous' reporting is the reporting of false claims that are devoid of merit.

'Vexatious' reporting is the reporting of false claims that seek to intentionally annoy, embarrass, harass or harm.

'Extraneous' reporting is the reporting of false claims that are irrelevant or unrelated to the purpose of this policy.

<u>Indigenous</u>: is an umbrella term used by the United Nations Declaration on the Rights of Indigenous Peoples. Indigenous Peoples are inheritors and practitioners of unique cultures and ways of relating to people and the environment. They are living collectives that maintain social, cultural, economic, and political characteristics that are distinct from those of the dominant societies in which they live. Due to Indigenous being an umbrella term, whenever possible use the specific terms relevant to an individual or Recognized Indigenous Collective

<u>Inuit</u>: are a global group of culturally and historically similar Indigenous Peoples traditionally inhabiting the circumpolar north (Arctic and subarctic regions). In Canada, Inuit live primarily in Inuit Nunangat, the Inuit homeland. Inuit Nunangat is comprised of four regions in Canada: Nunatsiavut (Northern Labrador), Nunavik (Northern Quebec), Nunavut, and Inuvialuit Settlement Regions (Northwest Territories). The term Inuit translates to 'the people' in Inuktitut, the Inuit language.

<u>Material gain</u>: is a tangible advantage for students, faculty, and staff accessed through opportunities such as but not limited to staff and faculty positions; designated seats; awards, scholarships, fellowships, bursaries, funding, and other opportunities. See also reputational benefit.

<u>Métis:</u> refers to distinct Indigenous Peoples with a unique history, culture, language, and territory. They are descendants of individuals born of relations between First Nations People and European settlers that resulted in the creation of the Métis Nation.

Recognized Indigenous Collective: For the purposes of this policy, a 'Recognized Indigenous Collective' in Canada is either 1) an Indigenous collective that is federally recognized and hold Constitutional rights under section 35, or 2) is accepted as an Indigenous collective by their federally-recognized neighbours. Neighbours include those with whom a Recognized Indigenous Collective has historical relationships, with particular attention being paid to relationship within the three Indigenous groups under Section 35, specifically: First Nations to First Nations relations; Inuit to Inuit relations; and Métis to Métis relations.

Outside of Canada, a Recognized Indigenous Collective is defined by local Indigenous practices concerning citizenship/membership, and where applicable with consideration of the legal frameworks that may be present in the nation-states with which they co-exist.

<u>Relationality</u>: is a central concept within Indigenous worldviews; it is the concept that we all exist in relationship to one another, all living beings, and to the world around us. Relationships are the spiritual and cultural foundations of Indigenous Peoples. Relationality is how the world is known and understood, and how Indigenous Peoples know themselves and their responsibilities to one another.

<u>Reputational benefit</u>: is an advantage that is non-monetary in nature but promotes the reputation of the individual. A reputational benefit may best be understood as something an individual could use as indicative of merit. This may include, but is not limited to, non-monetary awards, honorary degrees, formal consultation, university communications, speaking engagements, designated Indigenous seats on boards or committees. See also Material gain.

<u>Section 35 of the Constitution Act</u>: Section 35 is the part of the Constitution Act that recognizes and affirms Indigenous/Aboriginal rights. This 1982 amendment to the Canadian Constitution was <u>led by Indigenous Peoples</u> for <u>Indigenous Peoples</u>, and is the basis on which the criteria for Recognized Indigenous Collectives in this policy is founded.

<u>Self-declare</u>: (sometimes also referred to as self-identification) is to state or announces something about oneself without external validation or confirmation. Self-declaration depends on the honour system, is individual and not relational, and does not rely on a verification process. Universities across Canada are moving away from self-declaration as the standard method used to identify Indigenous faculty, students, and staff. The exclusive reliance on self-declaration of

Indigenous citizenship/membership is no longer sufficient due to the number of fraudulent claims by individuals that have emerged in recent years.

<u>Self-determination</u>: Article 3 of the United Nations Declaration on the Rights of Indigenous Peoples recognizes Indigenous peoples' right to self-determination, which includes the right to freely determine their political status and freely pursue their economic, social and cultural development.

<u>UNDRIP</u>: The United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) is an international instrument adopted by the United Nations on September 13, 2007, to enshrine (according to Article 43) the rights that "constitute the minimum standards for the survival, dignity and well-being of the indigenous peoples of the world." The UNDRIP protects collective rights that may not be addressed in other human rights charters that emphasize individual rights, and it also safeguards the individual rights of Indigenous people.

<u>University Community</u>: is comprised of all people who teach, conduct research, study, or work at or under the auspices of the University and includes, without limitation, all employees, all students; and any other person(s) while they are acting on behalf or at the request of the University.

<u>Verification</u>: is the act of checking or proving that something is true. Verification is consistent with Indigenous practices around the globe; it is not a colonial practice but an adaptation of Indigenous ways of being and knowing. To share who we are and how we are connected to a community has always been an Indigenous practice.

#### **Policy:**

## 1.0 Rationale

Indigenous Peoples around the world are united by shared worldviews rooted in relationality – the concept that we all exist in relationship to one another and to every facet of the world around us. To share who we are and how we are connected to a community has always been an Indigenous practice.

This policy establishes a procedure for the verification of Indigenous citizenship/membership through documentation. Verification is consistent with Indigenous practices around the globe; it is not a colonial practice but an adaptation of Indigenous ways of being and knowing. This policy is not about determining or verifying a person's identity. Indigenous citizenship/membership is rooted in relationality, unlike identity which is personal, cultural, and multidimensional.

Memorial University does not have the authority to decide who is or is not Indigenous, but rather works to understand, respect, and reinstate Indigenous practices of citizenship/membership. Consistent with Indigenous practices, the questions that must be asked are "who do you belong to?" and "who are you accountable to?" and the responses provided must be verifiable. Verification will be required for assertions of Indigenous citizenship/membership to/in the

University, where that claim may result in material gain, reputational benefit, or where the absence of verification would be otherwise contrary to the principles of this policy.

Memorial University recognizes the persistent legacies of colonialism and their continued impacts on Indigenous Peoples, communities, and governments. This necessitates an approach that honours and supports the diversity of Indigenous realities and experiences that affect citizenship/membership, such as, but not limited to residential schools, the Sixties Scoop, Indian Act exclusions, and other assimilationist policies and practices of colonial institutions. This policy respects the specific experiences of the Indigenous Peoples in the province of Newfoundland and Labrador; First Nations, Inuit, and Métis in Canada; American Indians, Alaskan Natives, and Native Hawaiians in the United States; and global Indigenous Peoples around the world.

#### 1.1 Self-declare vs. Verification

A distinction must be made in all reporting to differentiate between verified Indigenous students and employees and self-declared Indigenous students and employees. There are reasons to continue to use self-declaration, particularly the collection of data on numbers of Indigenous students and employees for demographic purposes. Without proceeding through the verification process students will NOT be eligible for Indigenous specific scholarships, awards, etc. Self-declaration is also used for employment equity surveys.

## 2.0 Recognized Indigenous Collectives

Memorial University recognizes that an exclusive reliance on self-declaration of Indigenous citizenship/membership is no longer sufficient due to the number of fraudulent claims by individuals that have increased in recent years. This issue is further complicated by the growing number of collectives across Canada claiming to be Indigenous. Section 35 of the Constitution Act establishes, within Canada, legal definitions that define who is Indigenous, and recognizes and affirms Indigenous rights and protections. This 1982 amendment to the Canadian Constitution was fought for by Indigenous people for Indigenous people, and is the basis on which the criteria for Recognized Indigenous Collectives in this policy is established. Outside of Canada, Recognized Indigenous Collectives are defined by local Indigenous practices concerning citizenship/membership, with consideration of the legal frameworks that may be present in the nation-states with which they co-exist.

False claims of Indigenous citizenship/membership in university spaces emerge, in part, due to a lack of meaningful relationships with Recognized Indigenous Collectives. Strengthening Memorial University's meaningful relationships with Recognized Indigenous Collectives is, in part, accomplished through the implementation of a verification policy that respects the right of Recognized Indigenous Collectives to determine their own citizenship/membership in accordance with their own governance, customs, traditions, and procedures.

#### 2.1 Recognized Indigenous Collectives in Canada

To determine the Recognized Indigenous Collectives within this policy, the University will utilize a dual approach which includes Indigenous and federal recognition practices. One approach is federal recognition under <u>Section 35 of the Constitution Act, 1982</u>. The other approach is

recognition as an Indigenous collective by their federally-recognized neighbours. Neighbours include those with whom a Recognized Indigenous Collective has historical relationships, with particular attention being paid to relationship within the three Indigenous groups under Section 35, specifically: First Nations to First Nations relations; Inuit to Inuit relations; and Métis to Métis relations.

## 2.2 Recognized Indigenous Collectives outside of Canada

When verification is necessary for citizenship/membership with a Recognized Indigenous Collective, outside of Canada, an equally consistent standard of rigor will be applied in a manner respectful of the community's local practices, protocols, and traditions. Where applicable, local legislation, legal definitions, and/or frameworks will also inform the verification process. These situations will be addressed by the Committee as needed, and may include interview(s) with the applicant, research, and communication with the community/group.

#### 3.0 Verification Pathways

Verification pathways are provided for Recognized Indigenous Collectives in Canada (section 3.1); American Indians, Alaskan Natives, and Native Hawaiians (section 3.2); and global Indigenous Peoples (section 3.3).

#### 3.1 Verification Pathways for Recognized Indigenous Collectives in Canada

Under the policy, an applicant will follow one of the three verification pathways for membership/citizenship with a Recognized Indigenous Collective in Canada: Pathway A requires the applicant to confirm their connection to a Recognized Indigenous Collective through the submission of primary documentation; Pathway B requires the applicant to confirm their connection to a Recognized Indigenous Collective through the submission of secondary documentation; Pathway C is reserved for specific incidents of displacement resulting from assimilationist policies and practices of colonial institutions.

- **3.1.1 Pathway A: Primary Documentation from a Recognized Indigenous Collective in Canada** For the purpose of verification under Pathway A, the documentation that must be provided is a copy of official membership with a Recognized Indigenous Collective that is current and unexpired. Please see the Verification Procedure for Applicants.
- **3.1.2** Pathway B: Secondary Documentation from a Recognized Indigenous Collective in Canada Where the provision of the documents under 3.1.1 cannot be provided, verification under Pathway B is contingent on approval from the Recognized Indigenous Collective to which the applicant claims connection. For verification, the applicant must submit a statement of relationality with a Recognized Indigenous Collective and a letter from an official representative. Please see the Verification Procedure for Applicants.

#### 3.1.3 Pathway C: Displacement and Disconnect

Where the provision of the documents under 3.1.1 or 3.1.2 cannot be provided, Pathway C may be applicable. This pathway responds to instances of displacement in which the individual is attempting to reconnect with community and cannot demonstrate membership/citizenship with

a Recognized Indigenous Collective. This may include, but is not limited to, assimilationist policies and practices of colonial institutions such as residential schools, the Sixties Scoop, Indian Act exclusions, and the foster care system or adoption. Please see the Verification Procedure for Applicants.

#### 3.2 Verification Pathway for Indigenous Peoples in the United States

In the case of American Indians/Native Americans, Alaskan Natives, or Native Hawaiians, documentation from tribal nations that are federally recognized should be provided for verification. Please see the Verification Procedure for Applicants.

## 3.3 Verification Pathway for Global Indigenous Peoples

Memorial University recognizes that the diversity of Indigenous Peoples extends far beyond the designation of First Nation, Inuit, and Métis. This policy will also apply to global Indigenous people who are being considered for Indigenous-specific opportunities under this policy. UNDRIP defines the right of Indigenous communities to determine their own membership in accordance with their customs and traditions. Please see the Verification Procedure for Applicants.

## 4.0 Responsibilities and Duties

#### 4.1 Verification Committee

The Verification Committee has the primary responsibility of verifying the submission of documentation under the policy. Duties involved in this process include review of the documentation provided, research, interview(s), and communication with external communities/groups, where necessary. The Verification Committee also functions to confer with the Vice-President (Indigenous) (VPI) on matters specific to the policy and its University-wide implementation. Please see the Verification Committee Terms of Reference.

## 4.2 Members of the University Community

The implementation of the Indigenous Verification policy is a shared responsibility of all members of the University Community. All members of the community are expected to: a. familiarize themselves with and comply with this policy and its related procedures; b. where and when appropriate, direct others to the policy and its related procedures; c. consult with the VPI or delegated authority regarding opportunities under the policy that require verification of Indigenous citizenship/membership, and refer persons to the VPI.

## 4.3 Members of the University Community with Academic or Administrative Authority

Those Members of the University Community with academic or administrative authority, including any individuals in positions relevant to Indigenous-specific opportunities, bear the responsibility to maintain working and learning environments that support Indigenous verification for Indigenous-specific opportunities. This includes but is not limited to: a. participating in, and supporting participation in, education about this policy and its related procedures;

b. adhering to the policy and procedures in order to facilitate informed and efficient implementation of the policy;

c. responding to instances of Indigenous citizenship/membership verification that occur in the unit in a timely and confidential manner

## 4.3 Office of the Vice-President (Indigenous)

The VPI or delegated authority has the primary responsibility for the implementation of the Indigenous Verification policy and procedures. Additionally, the VPI or delegated authority will provide related educational initiatives and resources to the University Community.

#### **5.0 Student Supports**

Resources will be made available to students who are navigating the policy. Please see section CCC of the procedures for more information about these resources.

#### 6.0 Compliance/Non-Compliance

The Indigenous Verification Policy applies to all members of the Memorial University community. Individuals who are found to have falsified or enabled the falsification of information or documents provided to the Verification Committee may be subject to disciplinary action within the University's applicable jurisdiction. Such disciplinary action shall follow the appropriate procedures as outlined in the relevant University policy, collective agreement, or legislation, as applicable.

#### 6.1. Confidential Disclosure

University employees who believe they have specific, verifiable evidence of false claims to Indigenous citizenship/membership as defined in this policy may disclose such concerns by bringing the matter to the attention of the VPI or delegated authority. Frivolous, vexatious, or extraneous reporting under this policy may be subject to disciplinary action for such reporting.

The VPI or the delegated authority is responsible for ensuring that reports of false claims of Indigenous citizenship/membership are brought to the attention of the Verification Committee. The VPI will determine whether and how to proceed with an investigation of false claims.

All disclosures made under the policy and all investigations arising out of such disclosure will be handled in a timely, confidential, and sensitive manner and will not be disclosed or discussed with anyone other than those individuals with a legitimate need to know. All individuals involved in investigations arising from such disclosure shall keep the details and results confidential and not disclose any information without authorization

The University prohibits reprisals for good-faith reporting of false claims and will respond promptly to any concerns regarding retaliation linked to this type of disclosure.

#### 7.0 Review

If an applicant is unable to verify their citizenship/membership with a Recognized Indigenous Collective, the opportunity for a review can be implemented if new documentation is provided. For more information, see procedure YYY

## 8.0 Information Management

Information collected pursuant to this policy will be retained in accordance with the records retention policy of Memorial University and any associated schedules as applicable.

## 9.0 Confidentiality and Privacy

Memorial University recognizes the history of misuse of Indigenous information in academia. The safeguarding of all personal information for Indigenous verification is of utmost importance. All information and documentation collected in the verification process will be used only for the purpose for which it was gathered. Information may be shared for the purpose of verification with the Recognized Indigenous Collective if necessary.

The University recognizes that the privacy of the individuals affected by this policy is of the utmost importance. Confidentiality is to be ensured and information is to be managed as prescribed under the *Access to Information and Protection of Privacy Act, 2015* (ATIPPA 2015).

Personal information collected to support Indigenous citizenship/membership verification is managed in compliance with ATIPPA 2015 and <u>Memorial's Privacy policy</u>. Access to personal information is restricted to university employees whose duties require such access to process verification requests.

For more information on how Memorial University manages personal information, please see the <u>Information and Privacy Access Office</u> website. Questions on the collection of personal information to support the Indigenous Verification Policy may be addressed to <u>iap@mun.ca</u>

#### 9.1 Third Party Requests for Verification

University employees or students may seek Indigenous-focused opportunities (i.e. research funding, scholarships, bursaries, awards, special seats, employment, committee appointments or admissions) from organizations that are external to the Memorial University. Memorial University upholds the principle that identifying or acknowledging who is and who is not a citizen/member of an Indigenous community must be done and communicated directly by the Indigenous community, and not by the University. As such, the University will not vouch, affirm, attest to, or deny the citizenship/membership of a former or current employee or student when requested by individuals or organizations that are external to the Memorial University.

The Indigenous Verification policy serves the sole purpose of determining eligibility instances applicable to this document. It does not extend to verification processes external to the University. Verification may not be requested by external parties.

Memorial University does not have the authority or the capacity to assist individuals in obtaining citizenship/membership with a Recognized Indigenous Collective.

#### **10.0 Related Documents**

This policy does not preclude the existence and use of other policies. Memorial University's Vision, Mission, and Values Strategic Framework for Indigenization

Respectful Workplace

Student Code of Rights and Responsibilities

Recruitment and Selection of Non-Academic Employees

<u>Information Management policy</u>

Equity, Diversity and Inclusion in Employment policy

**Employing and Hosting Foreign Nationals policy** 

**Retention and Disposal Schedules** 

Canadian Human Rights Act (R.S.C., 1985, c. H-6)

Employment Equity Act (S.C. 1995, c. 44)

The United Nations Declaration on the Rights of Indigenous Peoples

#### **PROCEDURES**

#### **Verification Procedure for Applicants**

#### 1.0 Verification Process

- A. When an applicant applies to an opportunity requiring the verification of Indigenous citizenship/membership with a Recognized Indigenous Collective, the administering unit/body must submit the applicant's name to the Verification Committee.
  - This process must be followed regardless of prior successful verification.
- B. If the applicant has already been verified by the Committee and all documentation is current and unexpired, confirmation will be provided to the administering unit/body. If the Committee determines the applicant has not yet been verified or if previous documentation has expired, the administering unit/body must direct the applicant to submit documentation directly to the Verification Committee.
  - Unless otherwise directed by the administering unit/body, under no circumstances should an individual submit documentation directly to the Verification Committee.
- C. The applicant submits current and unexpired documentation to the Verification Committee. The applicant must:
  - Indicate the Pathway under which they are applying;
  - Provide the documentation required under the indicated pathway. See section
    2.0 of procedures;
  - Indicate the Recognized Indigenous Collective of which they are a citizen/member.
- D. Documentation will be reviewed and verified by the Verification Committee and the outcome of the verification process will be communicated to the administering unit/body that requested verification.

- The Verification Committee may request additional evidence from the applicant and/or consult with internal or external resources, as appropriate in order to complete their assessment.
- E. The Committee will provide notification to the administering unit/body.

## 2.0 PATHWAY CRITERIA/VERIFICATION DOCUMENTATION

#### 2.1 Section 3.1.1 of the Policy:

## Pathway A: Primary Documentation from a Recognized Indigenous Collective in Canada

All documentation submitted must be current and unexpired. One of the following will be accepted as supporting documentation, for the purpose of Indigenous verification:

#### **First Nations**

First Nations applicants may submit a copy of one of the following to meet the criteria for verification:

- Secure Certificate of Indian Status (Status Card);
- Temporary Confirmation of Registration;
- Official First Nations-issued identification document

#### Inuit

Inuit applicants may submit a copy of one of the following to meet the criteria for verification:

- Inuit Enrollment card associated with one of the Land Claim Agreements in the claim regions of Nunatsiavut, Nunavik, Nunavut, and Inuvialuit;
- Proof of a Nunavut Trust Certificate Card;

#### Métis

Métis applicants may submit a copy of one of the following to meet the criteria for verification:

- A membership or citizenship card from one of the following Métis organizations
  - Manitoba Métis Federation
  - Métis Nation of Saskatchewan
  - Métis Nation of Alberta
  - Métis Nation of Ontario
  - Métis Nation of British Columbia

#### 2.2 Section 3.1.2 of the Policy:

## Pathway B: Secondary Documentation from a Recognized Indigenous Collective in Canada

Where the provision of the documents outlined in section 3.1.1 of the policy cannot be provided, verification under Pathway B, section 3.1.2 of the policy, is contingent on approval from the Recognized Indigenous Collective to which the applicant claims connection. For verification the applicant must submit:

A statement of relationality with a Recognized Indigenous Collective. The statement must provide specific, verifiable information about:

- The applicant's lineage and connection as an Indigenous person (personal narrative);
- The living First Nations, Inuit, or Métis community to which they claim connection including information about their applicable treaty, scrip, land claim, settlement agreement and territory or region;
- Familial relationships to that community;
- The circumstances that explain why they are not able to access and provide documentation from 3.1.1.

#### AND

A letter from an official representative (e.g. elected or hereditary chief, elected government leader, band councilor, councilor, assembly member, or a senior non-elected official within a First Nation, Inuit or Métis government body). The letter must clearly indicate whether the applicant has been acknowledged or accepted by the community to which they claim a connection

The Verification Committee may request additional evidence and/or consult with internal or external resources, as appropriate.

## 2.3 Section 3.1.3 of the Policy:

## Pathway C: Displacement and Disconnect

Where the provision of the documents outlined in sections 3.1.1 or 3.1.2 of the policy cannot be provided, Pathway C may be applicable. This pathway responds to instances of displacement in which the applicant is attempting to reconnect with community and cannot demonstrate membership/citizenship with a Recognized Indigenous Collective. This may include, but is not limited to, assimilationist policies and practices of colonial institutions such as residential schools, the Sixties Scoop, Indian Act exclusions, and the foster care system or adoption. Verification under Pathway C will be addressed by the Verification Committee on a case-by-case basis; the applicant must provide a written statement of the circumstances that explain why they are not able to access and provide documentation per sections 3.1.1 and 3.1.2, and any relevant documentation to support their statement.

The Verification Committee may request an interview with the applicant, and may request additional evidence and/or consult with internal or external resources, as appropriate.

## 2.4 Section 3.2 of the Policy:

## Verification Pathway for Indigenous Peoples in the United States

In the case of American Indians, Alaskan Natives, or Native Hawaiians, documentation from tribal nations that are federally recognized should be provided for verification:

- Tribal enrollment cards with Bureau of Indian Affairs assigned numbers.
- Hawaiian Registry Program.

The Verification Committee may request additional evidence and/or consult with internal or external resources, as appropriate.

#### 2.5 Section 3.3 of the Policy

## Verification Pathway for Global Indigenous Peoples

In the case of global Indigenous Peoples, verification will be addressed as needed by the Verification Committee, with appropriate consideration of the rich diversity of global Indigenous groups and their unique protocols, practices, and traditions concerning citizenship/membership, which may vary from region to region. Where applicable, local legislation, legal definitions, and/or frameworks will also inform the verification pathway for global Indigenous Peoples.

The Verification Committee may request an interview with the applicant, and may request additional evidence and/or consult with internal or external resources, as appropriate.

#### 3.0 VERIFICATION COMMITTEE

The Verification Committee has the primary responsibility of verifying documentation submitted under the policy. Duties involved in this process include but are not limited to review of the documentation provided, research, interview(s), and communication with internal and external resources, where necessary. The Verification Committee also functions to advise the Vice-President (Indigenous) on matters specific to the policy and its University-wide implementation. Please see the Terms of Reference for the Verification Committee.

The Verification Committee will provide confirmation of verification of Indigenous citizenship/membership to the administering unit/body, but is not involved in any selection process.

## **Reconsideration Procedure for Applicants**

If an applicant is unable to verify their citizenship/membership with a Recognized Indigenous Collective, the opportunity for a reconsideration by the Verification Committee can only be implemented if new documentation is provided.

New documentation may include documentation that is current and unexpired, and documentation that was previously unavailable to the applicant.