

Indigenous Substantiation – Final Recommendations Report

Introduction

Indigenous identity fraud is an increasingly significant issue in Canada, impacting Indigenous communities and institutions alike. This type of fraud occurs when individuals falsely claim Indigenous identity to gain access to scholarships, grants, jobs, or opportunities reserved for, or that give priority to, Indigenous People, or to gain social or political legitimacy. This rise has prompted widespread concern, particularly as Indigenous Peoples advocate for recognition, sovereignty, and equitable access to opportunities.

We are adopting the term Indigenous “substantiation” rather than “verification.” The term ‘substantiation’ reflects a respectful and contextually appropriate approach. The University of Toronto does not determine or verify Indigenous identity. Rather, it accepts claims that are supported by evidence, based on criteria developed through community engagement and guided by Indigenous-led oversight regarding their respective approaches to Membership, Citizenship, and Enrolment (M/C/E).

As institutions that hold significant power, privilege, and responsibility in shaping access to material opportunities, universities must take meaningful steps to protect the integrity of Indigenous spaces, resources, and sovereignty. When individuals seek to access material benefits based on Indigenous identity, whether through employment, advancement, or admissions, etc., the responsibility to substantiate those claims becomes critical. Upholding this responsibility helps ensure accountability and supports the fair allocation of opportunities intended for Indigenous Peoples.

Indigenous substantiation is a sensitive and complex process that intersects with questions of community, belonging, and self-identification. It requires careful consideration of Indigenous ways of knowing and doing and should be developed in close collaboration with Indigenous communities. The purpose of this report is to recommend a

framework for Indigenous substantiation at the University of Toronto that aligns with existing standards at other Canadian universities/institutions while respecting the unique identities and cultural nuances of Indigenous Peoples.

Indigenous Identity Substantiation Committee

The Indigenous Identity Substantiation Committee, established on March 14, 2023, is comprised of Indigenous senior leadership, staff, faculty members, and students from across the University. This committee plays an advisory and governance role in guiding the development, implementation, and ongoing evaluation of the Indigenous Substantiation process. Its composition ensures that diverse Indigenous perspectives are reflected in decision-making, and that the process remains grounded in community accountability, cultural integrity, and institutional responsibility. The committee supports alignment with broader goals of reconciliation, self-determination, and the protection of Indigenous-specific material benefit within the University.

Current Membership

Name	Nation	Community	Role
Shannon Simpson, Co-Chair	Anishinaabe	The Mississaugas of Alderville First Nation	Senior Director, Office of Indigenous Initiatives
Elder Bonnie Jane Maracle, Co-Chair	Haudenosaunee	Mohawks of the Bay of Quinte	Elder
Jessica Tabak, Project Lead (Oct. 2024-Present)	Anishinaabe	Chippewas of Nawash Unceded First Nation	Special Projects Officer, Indigenous Research
Susan Hill, Member	Haudenosaunee	Six Nations of the Grand River	Director, Centre for Indigenous Studies Associate Professor, Indigenous Studies/History
Tee Copenace, Member	Anishinaabe	Niisaachewan Anishinaabe First Nation	Director, Indigenous Initiatives, UTM
Carol Ducharme, Member	Saulteaux	Keeseekoosie First Nation	Assistant Director, Indigenous Initiatives, UTSC
Jennifer Brant, Member	Haudenosaunee	Six Nations of the Grand River, Mohawks of the Bay of Quinte	Associate Professor Ontario Institute for Studies in Education,

			Department of Curriculum, Teaching and Learning
Jenny Blackbird, Member	Nehiyaw	Kehewin Cree Nation	Resource Centre and Programs Coordinator, First Nations House
Chadwick Cowie, Member	Anishinaabe	Hiawatha First Nation	Assistant Professor, Political Science, UTSC
Michelle Daigle, Member	Mushkegowuk	Constance Lake First Nation	Assistant Professor, Canada Research Chair in Indigenous Geographies
Lindsey Fechtig, Member	Anishinaabe	Curve Lake First Nation	Manager, Office of Indigenous Health, Temerty Faculty of Medicine
Thomas Froh, Member	Métis	Métis Nation Ontario	Information & Change Consultant, Strategic Initiatives
Jonathan Hamilton-Diabo, External Member	Haudenosaunee	Mohawks of Kahnawake	Assistant Professor (Teaching Stream) Special Advisor, Indigenous Initiatives at Victoria University

Previous Members

Name	Nation	Community	Role	End of Term
Sadie May	Anishinaabe	Nipissing First Nation	Undergraduate Student, UTM	September 2024
Sandi Wemigwase	Anishinaabe	Little Traverse Bay Bands of Odawa Indians	Doctoral Student, OISE	September 2024
Kelly Crawford	Anishinaabe	M'Chigeeng First Nation	Assistant Director, Indigenous Initiatives, UTSC	November 2024

Guiding Principles

The recommendations in this report have been developed through a process of engagement with Indigenous communities within and beyond the University of Toronto. This work has actively involved Indigenous staff, faculty members, librarians, Elders, institutional leaders, and Indigenous Nations. Engagement took place through committee meetings, community sessions, an online portal, and anonymous feedback channels. The following groups and communities contributed to this process:

- The Elder's Circle
- Indigenous Identity Substantiation Committee
- The Office of Indigenous Initiatives
- Council of Indigenous Initiatives
- The Indigenous Research Network
- Indigenous Student Advisory Circle
- UofT Indigenous Community Consultation Sessions (January 27 & January 31, 2025)
- UofT Online Consultation Portal (Open from January 10 to March 7, 2025)
- Anonymous Feedback Form (Google Forms)
- UofT Institutional Leadership
- The Office of University Counsel
- Mississauga First Nation
- The Mississaugas of Alderville First Nation
- The Mississaugas of the Credit First Nation
- Hiawatha First Nation
- Mississaugas of Scugog Island First Nation
- Six Nations of the Grand River
- The Manitoba Métis Federation
- The Métis Nation of Ontario
- Inuit Tapiriit Kanatami

Disclaimer

The Indigenous communities and representatives engaged by the University of Toronto in the Indigenous Substantiation process have participated for the purpose of assisting the University in developing a framework to substantiate Indigenous claims in its programs, policies, practices, etc. Their participation does not constitute political or collective endorsement of the inclusion, recognition, or representation of all communities referenced in the report or in the University's process. Each community retains its own governance, rights, and decision-making authority, and engagement in this process should not be interpreted as endorsement of other communities or positions included herein.

This process reflects a university-wide commitment to reconciliation and accountability, consistent with the principles outlined in the [*Final Report of the Steering Committee on the University of Toronto Response to the Truth and Reconciliation Commission of Canada*](#) (2017). Central to this commitment is the recognition that Indigenous M/C/E is complex and shaped by specific histories, kinship systems, and community connection among First Nations, Métis, and Inuit Peoples. As the University continues to advance its commitments to increase the representation of Indigenous staff, faculty, librarians, and students, the objective of this process is to ensure that individuals who are recruited, employed, celebrated or receiving material benefit in opportunities where M/C/E is preferred or a determining factor for access or eligibility can substantiate their claims to Indigenous M/C/E.

Scope of Impact

The Indigenous Substantiation process outlined in this Recommendations Report is designed to uphold the integrity of material benefit and opportunities designated for Indigenous Peoples. This process applies to both prospective and current members of the university community, including students, staff, faculty members, and librarians, who identify as Indigenous in contexts where M/C/E is preferred or a determining factor for access or eligibility.

It is proposed that the substantiation process be implemented in, but not be limited to, the following contexts:

- Student admission pathways
- Employment opportunities (including internal promotions, transitions, short-term, or contractual employment)
- Research funding
- Scholarships, awards, grants, and financial aid
- Distinctions and other recognitions (e.g., Eagle Feather Bearing)
- Procurement or commissioned projects (e.g., design, writing, facilitation)
- Honoraria for guest lectures, panels, teaching engagements, and other participatory contributions
- External services (Catering, food service arrangements, vendors, etc.) involving Indigenous identity as a factor
- Other contexts where Indigenous M/C/E is a determining factor for material benefit

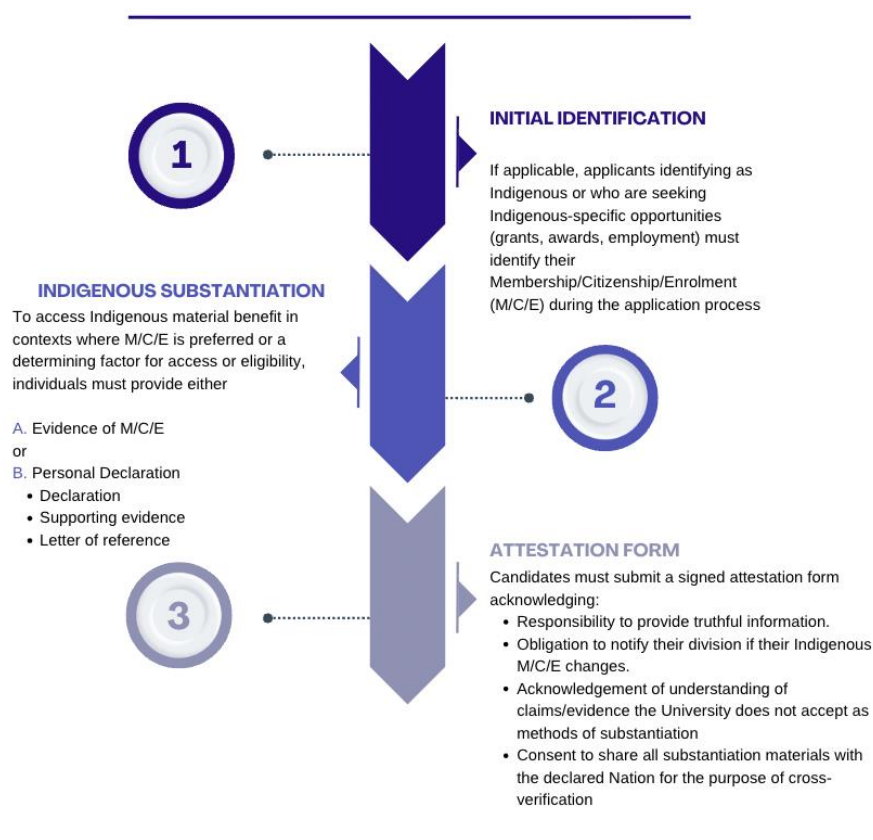
Given the range of areas where Indigenous M/C/E may be a consideration, the Office of Indigenous Initiatives will work collaboratively with academic divisions, administrative units, and student services to ensure the process remains context-specific, culturally grounded, and responsive to the evolving needs of the University community.

We recommend that all hiring panels for positions designated for Indigenous Peoples, or where candidates identify as Indigenous, include at least two Indigenous employees. In the context of student admissions, we also recommend that student-facing staff and support offices be appropriately prepared to assist applicants who are required to substantiate their M/C/E or who may be impacted by the process. This includes providing culturally appropriate guidance, care, and administrative support to ensure students are treated with respect and supported throughout.

To promote transparency and consistency, we recommend that a link to the Indigenous Substantiation process be included in all postings, advertisements, or notices for positions, opportunities, or material benefit where the process may be applicable. In support of these measures, we further recommend that the University allocate appropriate resources to facilitate implementation, including staffing, training, and infrastructure to ensure the substantiation process is delivered consistently, respectfully, and in alignment with the principles outlined in this report.

By applying the substantiation process equitably across employment, academic, contractual, and funding pathways, the University of Toronto affirms its commitment to respectful engagement with Indigenous Peoples and the responsible implementation of its institutional goals.

Recommended Framework



1. Initial Identification

Applicants identifying as Indigenous or who are seeking material benefit specifically designated for Indigenous individuals including grants, awards, employment, or other funding programs, must identify their Indigenous M/C/E during the initial application process. While this practice has been consistently applied within the institution, it is now being formally documented to reinforce transparency, accountability, and procedural clarity.

2. Indigenous Substantiation

The point of initiation for the Indigenous Substantiation process will be defined through the implementation process. Candidates can submit either A) evidence of M/C/E, or B) a personal declaration.

Recognizing that Indigenous substantiation from communities outside of Canada and the continental United States (including, for example, Indigenous Peoples of Mexico, Hawaii, Aotearoa [Māori], and Australia) varies from Nation to Nation, candidates from these communities must submit a Personal Declaration as outlined in Option B. These submissions will be reviewed on a case-by-case basis, with care and consideration for the diverse contexts of international Indigenous communities.

A. Evidence of M/C/E

To substantiate M/C/E, candidates must provide at least one form of evidence that aligns with culturally appropriate practices. Confirmation of M/C/E can be supported in the following ways:

- A Certificate of Indian Status.
- Written confirmation of Membership/Citizenship/Enrolment from a Canadian rights-bearing nation.
- A copy of a Métis Nation Citizenship card from one of the following groups: Métis Nation-Saskatchewan, The Otipemisiwak Métis Government, the Métis Nation British Columbia, Metis Settlements of Alberta, the Northwest Territory Métis Nation, the Métis Nation of Ontario or a Manitoba Métis Federation Citizenship card.
- A copy of an Inuit Enrolment card issued by any one of the four Inuit modern treaty bodies— Nunavut Tunngavik Incorporated, Makiivik, Nunatsiavut Government, and Inuvialuit Regional Corporation
- A copy of an Enrolment card or written confirmation of Membership/Enrolment from a United States federally recognized Tribal Nation or Alaska Native entity/Villages.

The Office of Indigenous Initiatives will be working directly with the following Indigenous Nations to respectfully and collaboratively confirm M/C/E:

- Mississauga First Nation
- The Mississaugas of Alderville First Nation
- The Mississaugas of the Credit First Nation
- Hiawatha First Nation
- The Mississaugas of Scugog Island First Nation
- Six Nations of the Grand River
- The Métis Nation of Ontario
- The Manitoba Métis Federation
- Inuit Tapiriit Kanatami

B. Personal Declaration

Alternatively, to support those impacted by colonialism that led to disconnection from their communities, candidates without evidence listed in “Option A: Evidence of M/C/E” must submit a Personal Declaration.

This declaration, with supporting evidence and references outlined in this section, can attest to their lived experience being a claimed member of an Indigenous rights-bearing Nation.

To complete the Option B: Personal Declaration requirements, candidates must submit the following three components:

1. Declaration
2. Supporting Evidence
3. Letter of Reference

Declaration

Candidates must provide a detailed statement outlining their individual circumstances and include evidence related to their First Nation, Métis, or Inuit M/C/E. The statement must explain their lived experience, kinship, and connection to a rights-bearing Nation that claims them. The Office of Indigenous Initiatives may request clarification if the declaration is insufficient.

Supporting Evidence

The declaration must be supported by at least one of the following:

- Proof for a First Nation individual born after 1985 affected by the Indian Act's second-generation cut-off rule. (Certificate of legal adoption, family records, historical band lists, etc.)
- Evidence of direct and lineal family ties to an Indigenous rights-bearing Nation (Proof of parent or grandparent with recognized Status/Citizenship/Enrollment or band membership, birth certificate with parental information, genealogy results, etc.)

Letter of Reference

A supporting letter must be provided from an Indigenous Elder, Knowledge Holder, community, or government confirming the candidate's connection to an Indigenous rights-bearing Nation. The letter must include the affiliation and contact details of the referee. The referee must be from the same community as the candidate and able to articulate the candidate's Indigenous M/C/E. The University will contact referees to verify the authenticity of the letter and the candidate's connection to the stated community.

3. Attestation Form

Successful candidates for any material benefit must complete and submit an attestation form. This attestation form will include:

- Attestation that they have provided truthful information in the course of the substantiation process, with an acknowledgement that: (i) this is a fundamental term of the agreement with the University, (ii) the University has placed reliance on this attestation, and (iii) a misrepresentation in the information provided may be treated as grounds for rescission of the agreement providing for the material benefit and/or other corrective actions, including termination of the material benefit.
- An acknowledgment of the responsibility to inform their division if the applicant is no longer a member/Citizen of their declared Nation.
- An acknowledgement of the understanding that claims must reflect genuine connections to an Indigenous rights-bearing Nation through M/C/E, ancestry, culture, kinship, and lived experience. The University will not accept claims/evidence such as the following:
 - Claims based on self-identification or family lore
 - Claims based on marital affiliation - where an individual asserts Indigenous M/C/E through a partner or spouse
 - Claims based on "cultural adoption." This refers to embracing Indigenous cultural practices and kinship without undergoing a legal adoption process by a caregiver into an Indigenous family or Nation and despite otherwise having no Indigenous ancestry
 - Claims that are tied to Memberships/Citizenships/Enrollment that are not rights-bearing. **Rights-bearing** Indigenous Nations hold recognized Indigenous rights, affirmed through treaties, constitutional provisions, or legal rulings. In contrast, **rights-seeking** groups are in the process of seeking

formal recognition of their Indigenous M/C/E or rights through legal, political, or advocacy efforts

- DNA test results (e.g., 23andMe, AncestryDNA, MyHeritage, etc.)
- Genealogy results that are conducted by a genealogist who is not certified by the Board for Certification of Genealogists or who are not members of the Association of Professional Genealogists
- Affidavits
- Expired documentation

By signing the attestation, individuals will also indicate their consent to the University sharing relevant identifying information, including their Evidence of M/C/E or Personal Declaration with supporting evidence and references, with their declared Nation for the purpose of verifying Membership, Citizenship, or Enrollment in the declared Nation. Individuals may withdraw their consent at any time; however, withdrawal of consent may impact eligibility for the material benefit.

Implementation

The implementation of the Indigenous Substantiation process must be Indigenous led to ensure it reflects the values, perspectives, and lived experiences of Indigenous Peoples. Oversight and administration of all M/C/E-related claims will be the responsibility of the Office of Indigenous Initiatives (OII). As a central and trusted Indigenous-led body within the University, OII will play a critical role in ensuring that the process is conducted with cultural integrity, confidentiality, and care.

To support consistent and secure implementation, the University will develop a centralized digital portal for receiving and managing substantiation materials. This portal will be designed with robust data security measures to safeguard sensitive, personal, and community-based information. The use of a centralized system will eliminate the need for substantiation evidence to be circulated by email or through informal channels, thereby reducing risk and ensuring a streamlined, respectful process.

This approach will uphold Indigenous data sovereignty, protect the dignity of applicants, and reinforce the University's accountability to Indigenous communities. As implementation proceeds, the Office of Indigenous Initiatives will collaborate with

institutional partners to ensure all procedures remain responsive, culturally grounded, and aligned with evolving best practices

Indigenous Substantiation Panel

Operating alongside the Office of Indigenous Initiatives, the Indigenous Substantiation Panel (ISP) will be comprised of Indigenous Elders, community leaders, Knowledge Holders, staff, faculty members, and/or librarians. The ISP's role is to review claims that fall outside the scope of Options A and B, as well as claims submitted under either option that are unclear or require further consideration. All reviews will be approached with cultural sensitivity and an understanding of the historical and cultural complexities surrounding Indigenous M/C/E.

The panel will draw from a broader network of Indigenous staff, faculty, and librarians across the University, with members selected in relation to the specific claim under review. This ensures that reviews are informed, contextual, and not limited to a fixed group of individuals. On a case-by-case basis, the panel will include representatives from the Nation to which the applicant claims M/C/E, supporting a more nuanced and respectful assessment.

Summary and Conclusion

This recommended framework for Indigenous substantiation at the University of Toronto is grounded in respect, cultural sensitivity, and meaningful community engagement. Through transparent consultations and collaboration with Indigenous communities, the University can ensure fairness, accountability, and alignment with Indigenous ways of knowing and doing.

The Office of Indigenous Initiatives will continue to seek meaningful collaboration and engagement with the following communities as the Indigenous Substantiation policy is developed: Mohawks of the Bay of Quinte, Curve Lake First Nation, Huron-Wendat, Métis Nation-Saskatchewan, The Otipemisiwak Métis Government, the Métis Nation British Columbia, Metis Settlements of Alberta, and the Northwest Territory Métis Nation. The Office will also prioritize engagement with Indigenous students and student committees at the University of Toronto.

In parallel, OII will expand engagement to rights-bearing First Nations communities. This work will include the development of memoranda of understanding so that those communities can directly verify M/C/E. These agreements will be grounded in respectful relationships, community-defined protocols, and shared commitments to integrity and accountability.

Evaluation of this process will be relational, rooted in continued dialogue with Indigenous communities rather than fixed metrics alone. The Office of Indigenous Initiatives will remain responsible for ongoing engagement to assess how the substantiation process is working in practice and commits to revising and adapting the framework as needed. To support accountability and continuous improvement, OII will undertake a fulsome review of the process and its implementation after two years of implementation. This ensures the process remains responsive, culturally appropriate, and reflective of the diverse realities of Indigenous Peoples.

By following these recommendations, the University strengthens its commitment to reconciliation and builds more equitable and respectful relationships with Indigenous students, staff, faculty members, librarians, and communities.