

Witness Panel: Germaine Benuen, Amanda Rich, Wendy White

Response to written interrogatories

Provided on January 26, 2026

Questions from Inquiry Counsel:

1. At p. 13 some staff have “*” next to their role, what does that indicate?

- A. The asterisk next to a position on p. 13 indicates that the position is shared between both communities, i.e. the person in that role serves both communities in the course of their work. The asterisk dated from an earlier version of this list, before the shared positions were split out with a separate heading, so technically the asterisks are no longer necessary.

2. At p. 18 - “We are Here” diagram: Can you describe in a more detail what was involved in the “Information Gathering” stage?

A. The Information Gathering stage involved:

- a. Conducting interviews with Innu Elders in both communities, and analyzing and as well as translating and transcribing those interviews;
- b. Identifying recorded interviews with Innu elders from past years, scanning for interviews that may have relevant content, and then translating, transcribing and analyzing those interviews;
- c. Analysis of Innu testimony to this Inquiry;
- d. Identifying relevant documents created by Innu or documenting Innu perspectives, and analysis of that material;
- e. Analysis of Innu legends/stories, usually using written records of such legends/stories;
- f. Analysis of other written material, such as anthropological sources;
- g. Meetings of the Innu Law Committee; and
- h. Meetings with staff working in Innu child and family services (ongoing) including use of questionnaires.

a. Can you speak to the models that are being considered?

- A. We are not entirely clear on the meaning of this question. We have shared at a recent Innu Round Table tripartite meeting that the intention now is to start with a prevention-focused law, and then add protection at a later date. The first stage law is in development now.

b. What steps or supports are needed for the “Law Building” stage to begin? And is there a timeline for that?

- 2 -

- A. The law building stage is underway, and the written law will be shared when ready. It is not yet available.
3. **At p.18 - Re: Future staffing: You've estimated 180-200 people are needed to operationalize Innu Laws.**
- a. **Can you share any more detail about these projections and what roles you envision these people playing?**
- A. As the report says, this is based on "research with other nations" and "our internal projections". The research with other nations included hearing about staff numbers used or projected by other First Nations who are taking on jurisdiction, depending on the size of the population served and number of children in care. The internal projections was an effort to work out a detailed list of positions that we anticipate having. This list has been shared with ISC for capital funding purposes, but given that our plans are still in development and subject to change, we would prefer not to share this document with the Inquiry or a detailed outline of specific roles.
- b. **Given the challenges identified for human resources in both communities, do you feel your organization is on track to achieve that level of staffing? Or are there resources or supports still needed to get there?**
- A. Significant resources and supports will be needed to get there. This includes significant additional funds to support the services being taken on, as well as continued investment in Innu training/education.

While some non-Innu will be part of the organization, as currently, it is important to us to ensure that most staff are Innu, as this makes a significant impact on the level of integration of Innu culture and language in our services. For example, we want to be able to continue to offer the NVIT educational program inclusive of the Indigenous Human Services Certificate, Indigenous Human Services Diploma, and Bachelor of Social Work.

It is important to bear in mind that the Province has experienced challenges in human resources as well. Their staffing model does not work. It has not succeeded in attracting sufficient staff to the roles (there are numerous vacancies), it does not serve Innu children on a full time basis (only half time coverage for each family, with half of each month being uncovered time for each family/child), and the amount of turnover, inconsistency, and lack of culture and language skills (both due to insufficient numbers of Innu in the roles as well as the turnover rates among non-Innu staff diminishing Innu-specific knowledge in that employee base too) all create serious problems in the quality of service provided, in our perspective. High caseloads and burnout are serious problems as well.

- 3 -

Innu families and children are not well-served by the Province's current staffing approach. Relationship building and trust are key to success in this work, and that requires consistent, high quality workers. In building a new staffing model, we want to overcome the serious problems we have witnessed and focus on having a skilled, stable team that can really do the hard work required with families to make change. That requires more staff overall (to have manageable caseloads that are served full time), strategies to train and recruit significantly more Innu staff, and thoughtful approaches to staff compensation, benefits and workplace systems to ensure reasonable rates of retention.

4. In your presentation you discussed the current phased approach to building the Innu Laws and services. Please provide the slide presentation or other summary of the new approach.

- A. We can provide a summary. We are now planning to create and pass a first phase Innu law that focuses on:
- Overall governance (the structure of the Innu services and their oversight)
 - Overall principles (that guide all services)
 - Prevention services
 - Post-majority services, i.e. services for older youth / young adults exiting care

This law could be passed within 2026. We aim to start Coordination Agreement negotiations in 2026, and to conduct them efficiently with the goal of having updated funding for this phase in place for the 2027-28 fiscal year.

Work on the second phase is already underway, in that many of the foundational principles, governance and so on will carry forward. Work on the second phase will continue once phase 1 is underway. When ready, hopefully within the next 5 years, the Innu would pass the phase 2 version of the law that includes protection functions. We would then negotiate the next iteration of funding under the Coordination Agreement to support the full exercise of Innu jurisdiction, including protection.

5. In the presentation you discussed Prevention Laws, will this include any particular provision for funding (i.e, a requirement to provide resources/funding)? Is such funding already secured and long-term or is this a future need that you foresee?

- A. As described above, this would require additional funding, and we hope to secure that funding under a Coordination Agreement. Coordination Agreements are referred in the federal *Act respecting First Nations, Inuit and Métis children, youth and families*, SC 2019, c 24. A federal website reports that 15 Coordination Agreements have been reached so far, as of November 26, 2025: "Indigenous child and family services legislation" <https://www.sac-isc.gc.ca/eng/1608565826510/1608565862367>.

Questions from Counsel for the Government of Canada:

- 1. On page 32 of the Innu Services Report, you write “Our funding streams through ISC were depleted even though we had reached out and applied for more.” Please identify the funding streams to which you refer.**
 - A. This is in the SIFN part of the report, in discussing the SIFN treatment centre, now known as Apenam’s Way, and the pre-treatment facility. The code, indicated by SIFN Finance, states that Apenam’s Way and the pre-treatment facility have received funding under “Health Canada Q21E Innu Capacity & Intgr”. We believe this is likely a source through the First Nations and Inuit Health Branch, at ISC, which was formerly part of Heath Canada.
- 2. On page 41 of the Innu Services Report, you write “However the construction of that project, while partially supported with CHRT 41, is being held up due to delays with Jordan’s Principle at the federal level”. Please describe the delays to which you refer.**
 - A. This is in the Placement Facilities part of the report, discussing the SIFN Office Complex project, which is planned to include office space for SIM (Shushepeshipan Ishpitentamun Mitshuap). The facility was also planned to include office space for SIFN’s Jordan’s Principle program. The CHRT 41 capital process includes a stage by stage process, and it includes both child and family services and Jordan’s Principle. The initial application for the Office Complex was made to ISC in July 2024. It has go to through a Needs Assessment, Feasibility Study and then Design stage before it can proceed to Construction. ISC assesses the child and family services (CFS) portion separately from the Jordan’s Principle portion, using different units within ISC.

The CFS capital unit within ISC was ready to proceed with this project, but Jordan’s Principle has, to this day, still not confirmed whether the project is eligible for Jordan’s Principle purposes and if so, for how much. It has given indications of what might be eligible, but it has given no final answer to allow any of it to proceed with Jordan’s Principle funding. This could have held up the entire project at the very initial stage.

Luckily, the CFS unit within ISC was able to agree to fund the full Needs Assessment and Feasibility Study, allowing those phases to go ahead despite a lack of confirmed response from Jordan’s Principle. However ISC CFS indicated that Design and Construction, which are more expensive, would require specific percentages to be approved from each unit.

The Feasibility Study was completed and sent to ISC in November 2024. ISC’s CFS unit provided comments December-January, and it was updated and finalized in February 2025. ISC CFS confirmed it could fund 53% of the project. At that point the project should have proceeded to Design, followed by Construction. However there was still no formal response from Jordan’s Principle; it did not approve the Feasibility Study or confirm any percentage of the project that it would cover (nor did it reject it). In calls, Jordan’s Principle personnel advised that they anticipated delays would continue.

- 5 -

In fall 2025, SIFN obtained another source of federal funds to cover the portion of the Design phase that is not covered by ISC CFS. SIFN also decided to pursue a bank loan to cover Construction costs for the remainder of the project not covered by ISC CFS. SIFN is now working on finalizing those plans and working with ISC CFS to move ahead.

All in all the delays from Jordan's Principle set back this project by about a year. The project is now proceeding without the participation of Jordan's Principle.
