

IAP Office

From: [REDACTED]
To: Policy
Subject: Indigenous verification draft policy
Date: Thursday, May 1, 2025 4:55:25 PM

I am writing to offer my support for the draft policy. It addresses an important gap [REDACTED] at Memorial, and will play an important role in ensuring that opportunities that have been set aside for Indigenous scholars and students, or where Indigeneity is a qualification for particular roles, go to those they are intended for. As this recent report by the Yellowhead institute documents, such policies are more urgent than ever [REDACTED]
[REDACTED]

<https://yellowheadinstitute.org/wp-content/uploads/2025/03/Pretendian-April-Final.pdf>

I think the policy as drafted offers a judicious approach and a clear set of pathways for demonstrating citizenship/membership in an Indigenous collective.

I have just one suggestion for the consideration of the drafters. As this discussion paper from the CAUT's Aboriginal Post-Secondary Education Working Group suggests, it may make good sense to choose the term "substantiation" rather than "verification":

https://www.caut.ca/sites/default/files/indigenous_identity_substantiation_policies_april_2024.pdf

With thanks for the opportunity to comment,
[REDACTED]
[REDACTED]

From: [REDACTED]
To: President, The
Subject: Boycott of Memorial University
Date: Thursday, May 1, 2025 5:38:39 PM

Good evening,

I am writing to inform you that a boycott of Memorial University is imminent. [REDACTED]
[REDACTED] will be not enrolling at and/or withdrawing from Memorial if the discriminatory Indigenous verification policy passes. Many alumni are discussing either burning their diplomas publicly or returning them to The President. I urge you to act immediately.

Respectfully,
[REDACTED]

From: [REDACTED]
To: Policy
Subject: Indigenous Verification Policy
Date: Thursday, May 1, 2025 6:05:27 PM

Dear Committee,

I am writing to express my support for the proposed Indigenous Verification Policy. I think the proposed policy is thorough, clear, and fair. The committee has clearly put in an incredible amount of work, thought, and expertise into this document. I am particularly impressed as I think it does an excellent job of serving as a necessary tool for recognizing and supporting Indigenous scholars, colleagues, and students without granting the university the authority to determine anyone's identity or belonging, or targeting any specific groups or individuals. Having a clear, equitable policy is necessary as we work towards Indigenizing our programs and will allow us to responsibly conduct search committees for targeted hires. [REDACTED]

[REDACTED] I am so pleased to see this come to fruition and I hope that Memorial will be able to move quickly to adopt this policy.

I want to commend the committee on all of their work and appreciate the leadership from Vice President Andersen [REDACTED]

[REDACTED] I hope, will make Memorial a more supportive and enriching place for Indigenous faculty, staff, and students.

With kind regards,

[REDACTED]

[REDACTED]

From: [REDACTED]
To: Policy
Subject: RE: Draft Indigenous Verification Policy
Date: Friday, May 2, 2025 8:14:12 AM

Good morning.

I am writing to provide feedback regarding the draft Indigenous Verification Policy (2025).

[REDACTED]

[REDACTED] As you know, the current draft Indigenous Verification Policy makes it nearly impossible for NunatuKavut Community Council (NCC) members to obtain verification of their Indigeneity. Despite the strong engagement from members of this group throughout the policy consultation process, as evidenced in the "What We Heard (April 2024)" report about the consultation process for this policy, and their classification as an "Indigenous Nation, community and/or organization" in the context of that report, their feedback is not reflected in the resulting draft policy. I appreciate the complicated history of relationships among groups in Labrador

[REDACTED] However, from a purely public engagement perspective, not applying what was heard from NCC members during the consultation process in the resulting policy does not reflect my understanding of best practices, especially in the realm of meaningfully engaging with and applying learnings from groups that you include in your consultation plans [REDACTED]

[REDACTED]

[REDACTED] I appreciate the importance of ensuring that opportunities and positions meant for Indigenous peoples in an academic institution are not going to candidates who are not, in fact, members of an Indigenous group. However, creating a policy and procedures that result in an unfair burden to Indigenous academic community members compared to their non-Indigenous counter parts in order to prove their Indigeneity, and also excludes an entire group of people who self-identify as Indigenous, live, and work as an Indigenous community, does not seem like the right solution, [REDACTED]

[REDACTED]

[REDACTED] I urge you to please reconsider the processes set forth by this

policy and the exclusion of a group in our province

Thank you.

From: [REDACTED]
To: [Policy](#)
Subject: Indigenous Verification Policy
Date: Friday, May 2, 2025 9:07:32 AM
Attachments: [Letter to MUN.pdf](#)

Good Morning,

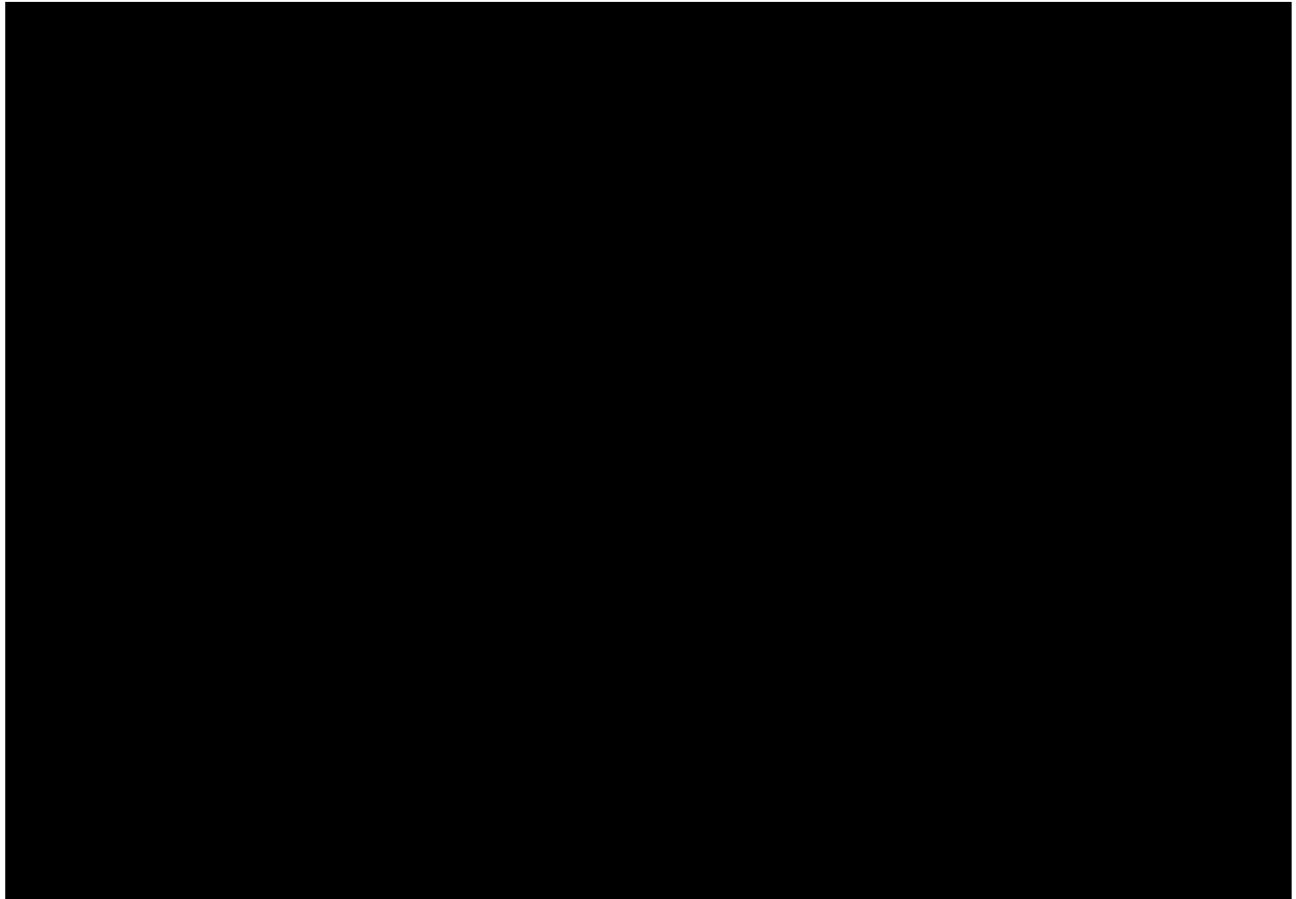
I have attached a letter with my feedback on the proposed Indigenous Verification Policy.

Thank You,

[REDACTED]

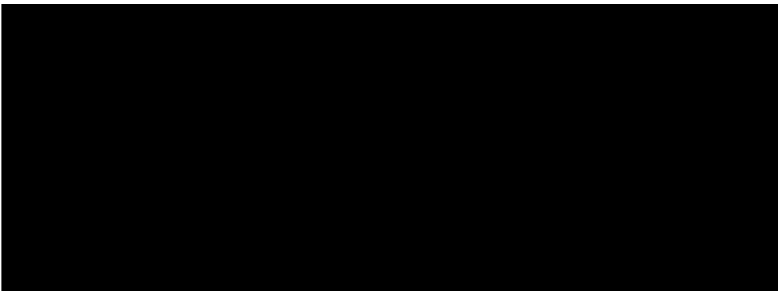
To Whom It May Concern:

I am writing to you in response to your Draft Policy for Consultation relating to your proposed Indigenous Verification Policy.



As your proposal noted that you are, “committed to Indigenization and reconciliation with Indigenous Peoples” I implore you to reconsider this proposed policy. As it stands your proposed policy will only continue the colonialist approach that continues to add to the intergenerational trauma of the Indigenous Peoples of Labrador. This policy continues to stoke the fire of the “divide and rule” tactic.

I thank you for your consideration in this matter.



From: [REDACTED]
To: Policy; President, The; Scott, Tina (Regents)
Subject: Feedback on Indigenous Verification Policy
Date: Friday, May 2, 2025 9:20:13 AM
Attachments: Indigenous verification policy draft feedback.pdf

Good morning,

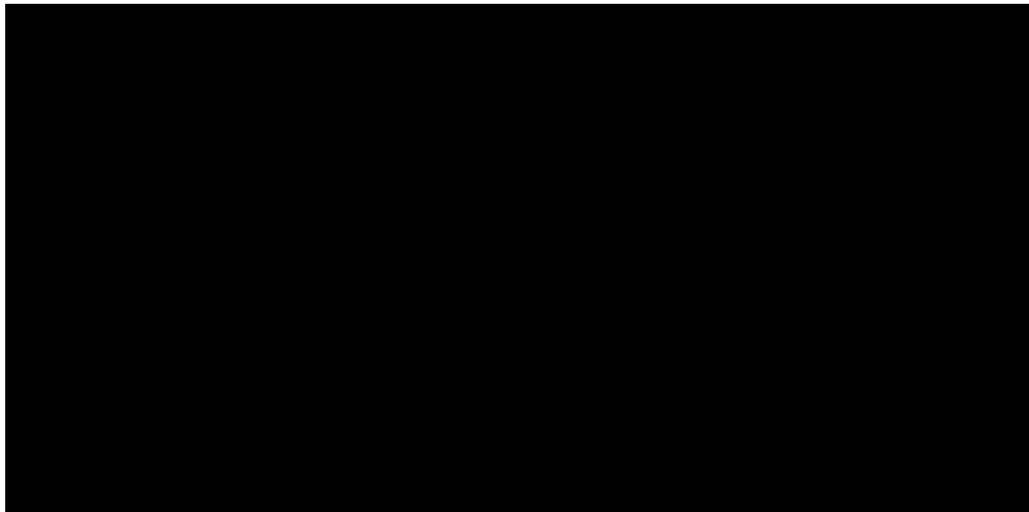
I've included my attached letter providing feedback on the Indigenous verification policy.

Thank you,

[REDACTED]

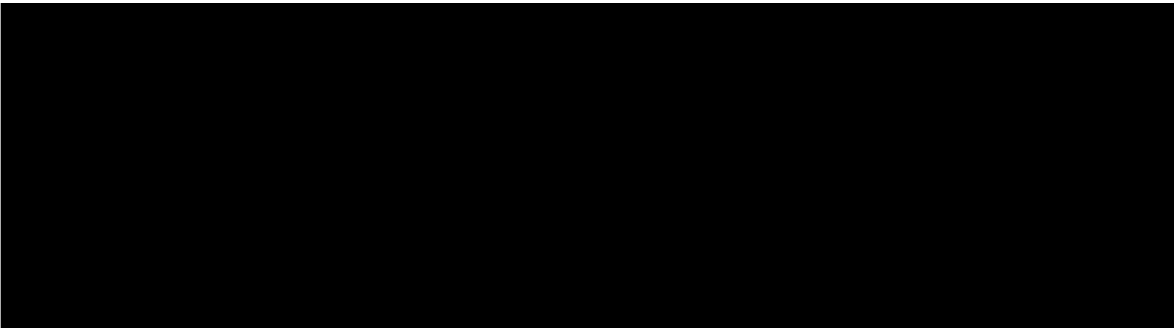
[REDACTED]

[REDACTED]



April 30, 2025

Dear Board of Regents,



I am writing to express my deep concern regarding the university's proposed Indigenous verification policy, which appears to exclude or delegitimize the identity and recognition of the NunatuKavut Community Council (NCC) in Newfoundland and Labrador.

While I understand and support the importance of developing responsible and respectful policies to ensure Indigenous programs and supports reach those they are intended to serve, the current policy risks marginalizing a legally recognized and culturally distinct Indigenous community. The exclusion of NCC from recognition in the university's policy contradicts federal recognition processes and undermines this province's complex and deeply rooted Indigenous identities. I urge the Board of Regents members to review President Russell's statement, which outlines how this exclusion was strategic and longstanding. As someone who values reconciliation, inclusion, and the rights of all Indigenous Peoples, I find it deeply troubling that the policy would dismiss or deny the Indigenous identity of members of NunatuKavut. The NCC is a longstanding Inuit community in southern Labrador with deep cultural, historical, and territorial roots. Its people have maintained their identity, governance, and connection to the land for generations. Moreover, the Government of Canada began formal Recognition of Indigenous Rights and Self-Determination (RIRSD) discussions with the NunatuKavut Community Council in 2019. This significant step affirms their status as an Indigenous rights-bearing people in Canada. For Memorial University to adopt a policy that disregards this recognition and fails to include NunatuKavut members as

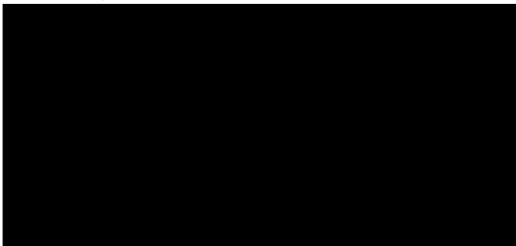
Indigenous peoples would not only be unjust but would also undermine the spirit of reconciliation and inclusive academic practice. Any Indigenous verification framework needs to be guided by the principles of inclusion, self-identification, community recognition, and respect for diverse Indigenous experiences, particularly in a province like Newfoundland and Labrador, where the impacts of colonization and historical erasure have created unique challenges in preserving and asserting Indigenous identity.

Such a policy would be discriminatory and harmful and contradict Memorial University's foundational mandate as the public university of Newfoundland and Labrador. Memorial University was established as a living memorial to those lost in war, with a special obligation to all this province's people. That obligation includes respecting and supporting the diverse Indigenous communities who are the first peoples of this beautiful land.

I respectfully urge the university to engage in transparent, meaningful consultation with all Indigenous groups in the province, including those currently at risk of being excluded. While I appreciate the politics, it is not sufficient or respectful to call one Indigenous leader and tell them they will be excluded from the table. Memorial is responsible for ensuring that any policy relating to Indigenous identity is informed by respect, consultation, and an understanding of the region's complex Indigenous histories. Developing an Indigenous verification framework should and cannot become a tool for exclusion or delegitimization; to do so is further colonization.

I trust the university will consider these concerns seriously and work toward a policy honouring reconciliation, inclusion, and respect for all Indigenous communities in Newfoundland and Labrador and that it aligns with the university's stated commitments to equity, reconciliation, and its enduring duty to serve the people of this province.

Sincerely,



From: [President, The](#)
To: [Policy](#)
Cc: [vpindigenous](#); [Andersen, Catharyn](#)
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Friday, May 2, 2025 9:40:07 AM

Forwarding for your information and attention.
I have acknowledged receipt on behalf of the President's Office.

Best regards,

Rose

Rose M. Frew, Executive Assistant to the President (Correspondence)

President's Office, Room A-2028

Arts and Administration Building | 230 Elizabeth Avenue

Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7

t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From: [REDACTED]
Sent: Friday, May 2, 2025 9:27 AM
To: President, The <munpres@mun.ca>
Cc: [REDACTED]
Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,

I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED]
[REDACTED] This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]
[REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
[REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.



From: [REDACTED]
To: [Policy](#)
Subject: Support for Indigenous Verification Letter
Date: Friday, May 2, 2025 9:40:07 AM
Attachments: [Support for Indigenous Verification Policy .docx](#)

Hello,

Please find attached my letter of support towards the indigenous verification policy at Memorial.

Regards,

[REDACTED]

May 2, 2025

Re: Indigenous Verification Policy

To whom it may concern:

I am writing in support of the Indigenous Verification policy at Memorial University. Verify someone is who they say they are. [REDACTED]

I have seen that not verifying indigeneity has led to worse outcomes. It has led to people claiming indigenous ancestry but not being indigenous for years. It has taken seats from indigenous students that need and deserve them.

Not verifying indigeneity damages the university's credibility. It is painful to the actual indigenous students who expect the "indigenous students" coming in to be indigenous and then discover they are mostly with white people.

In closing I support indigenous verification.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Policy](#)
Subject: Draft Indigenous verification policy and procedures open for consultation
Date: Friday, May 2, 2025 10:30:24 AM

People want to identify as Indigenous to receive special treatment. Take those perks away and none of them would identify as Indigenous. These people dishonor their ancestors by begging for handouts. Their ancestors were not beggars. Also, favoring one race over another is racism. Indigenization is racism.

From: [REDACTED]
To: Policy
Cc: [REDACTED]
Subject: Indigenous Verification Policy: Feedback
Date: Friday, May 2, 2025 10:54:14 AM

To Whom it may concern,

[REDACTED] The draft policy for indigenous verification seems to be designed specifically to ensure that members of Nunatukavut are not considered to be indigenous in the eyes of Memorial University. I am sure you are aware of the many ways in which this is unusual so I will not reiterate them here. Instead I will refer you to the official Nunatukavut response to the draft policy that can be found here:

[Memorial University's draft Indigenous Verification Policy a huge failure in Indigenous reconciliation: policy designed to exclude NunatuKavut Inuit especially targets youth | Nunatukavut](#)

[REDACTED] What is the basis for this decision? Additionally, how does the MOU between Nunatukavut and the Federal Government mean nothing to Memorial? And last but not least, I understand that consultation with The Innu Nation and The Nunatsiavut Government is of the utmost importance and I support that fully. Respectfully, how have their stances been written into this draft policy? Please explain to me how that decision is logical.

I guess my main issue with the policy is that it appears to be weighing in on the ongoing journey of Nunatukavut with the Federal Government. It is not Memorial University's place to weigh in on that process. It is not something for the University to determine.

Thank you,
[REDACTED]

From: [REDACTED]
To: Policy
Subject: Feedback on Draft Indigenous Verification Policy
Date: Friday, May 2, 2025 11:37:21 AM

Dear Policy Committee:

I am writing with feedback on the draft Indigenous Verification Policy (IVP). [REDACTED]
[REDACTED] I appreciate this process has been (necessarily) Indigenous-led, and the care and consideration with which consultations appear to have been carried out. I also recognize [REDACTED] and institutions, like Memorial University) must proceed with care around these questions, at the risk of perpetuating colonial violence and influencing political processes beyond their mandate. [REDACTED]

[REDACTED] My comments and questions are directed towards the alignment and application of the policies, for which I see some potential problems and pitfalls.

1. **Definitions and purposes:** While the purposes of these policies may be different, there is a fundamental misalignment in that they define "Indigenous Peoples" differently. While the proposed IVP emphasizes Sec. 35 recognition and recognition by Indigenous "neighbours" as criteria, [REDACTED]

Questions arising from the misalignment of these policies include:

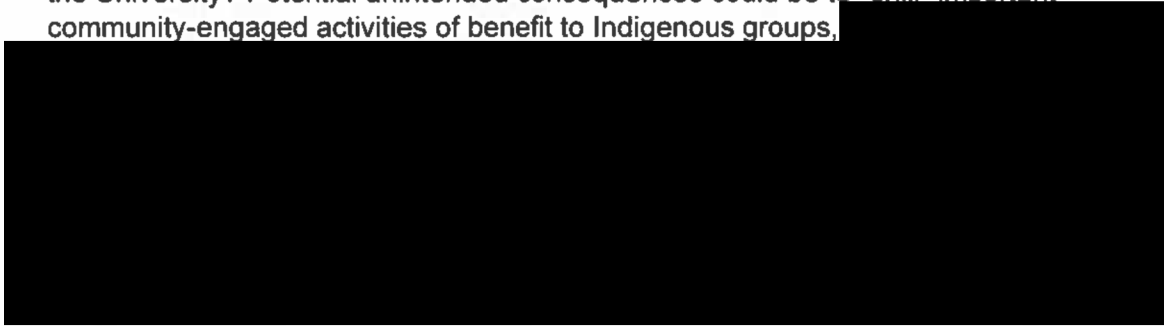
1. How will the IVP apply in processes of internal and external grant applications, [REDACTED]

2. In such cases, how will the IVP apply to student and community researcher hiring? [REDACTED]

[REDACTED] Would their participation and/or hiring be blocked by the IVP? Would students recruited from the community be blocked from Indigenous-focused

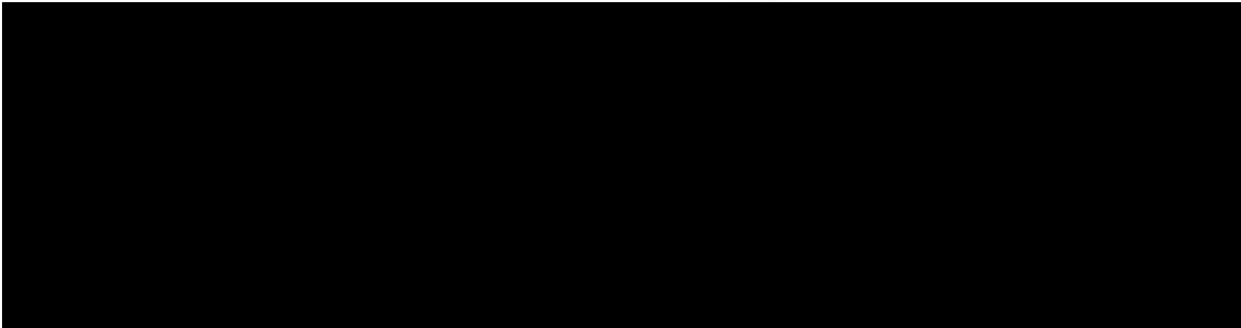
scholarships, awards, etc.?

3. More generally, what is the potential effect of having two clearly divergent definitions of "Indigenous Groups" on research, teaching, engagement, and partnership across the University? Potential unintended consequences could be to "chill" important community-engaged activities of benefit to Indigenous groups,



These questions and situations likely do not exhaust the potential confusion and contradiction arising from this policy misalignment. I would encourage the policy committee to carefully review the policies *together* with an eye to how they may interact, and potentially solicit further input from Indigenous Nations/Groups, researchers, and others in the University community to determine the potential pitfalls and how best to align these policies.

Cheers,



From: [REDACTED]
To: [Policy](#)
Subject: Feedback on Indigenous Verification Policy
Date: Friday, May 2, 2025 11:44:21 AM

Thanks for the opportunity to provide feedback on this important policy. In general, I support this initiative; however, the policy as is has shortcomings which I believe should be rectified.

Perhaps what gives me pause is the concept of "relationality" which the policy ascribes to Indigenous people. How is this a uniquely Indigenous quality? As described in the policy, relationality can extend to a variety of methods for knowing and understanding the world. Marxism and its language of social relations, for example, fits the description of relationality, as does materialism in general. Surely, however, the Policy isn't intended to verify the Indigenous membership of a bunch of social scientists who practice Marxist analysis and can confirm one another's conviction that they exist in relation to others and the world around them. So, of course, the policy has a mechanism to prevent this from happening: a list of recognized indigenous collectives who can verify individuals' membership. So why even include the section on relationality? At best, it fetishizes Indigenous people and is but a sentimental reproduction of the savage/civilized dichotomy. At worst, it opens the policy to criticism and weakens its mission. I recommend the discussion of relationality be scrapped from the policy.

Thank you for your time and consideration.

[REDACTED]

From: [REDACTED]
To: [Policy](#)
Subject: Opposition to Memorial University's Indigenous Verification Policy and its Misrepresentation of NunatuKavut Inuit
Date: Friday, May 2, 2025 12:32:48 PM

To Whom it may concern,

[REDACTED] I am concerned about Memorial University's Indigenous Verification Policy and the associated Indigenous Verification Report released in May 2024. [REDACTED]

I urge Memorial University to consider the impacts of this policy and engage directly with NunatuKavut Community Council (NCC) to address potential errors.

[REDACTED] The policy ignores legitimate history and fuels division among Indigenous peoples (Nunatsiavut Government and Innu Nation). [REDACTED]

I acknowledge Memorial University's intent to address fraudulent Indigenous identity claims such as the issue like that of [REDACTED]. The current policy fails to balance this goal with respect for legitimate Indigenous communities like NunatuKavut. Instead it risks harming Inuit students and faculty by demanding forms of proof that exclude those with unresolved land claims which is an all too common reality for many Indigenous groups in Canada.

I respectfully request that Memorial University engage directly with NunatuKavut Community Council and NCC members to correct errors and omissions. I request you listen to the NCC's offer to educate MUN further [REDACTED] rebuilding trust through meaningful dialogue. I request you to adopt an inclusive Verification Policy .

Memorial University has a responsibility to uphold reconciliation and foster an inclusive environment for all Indigenous peoples, including NunatuKavut Inuit. By addressing these errors, MUN can honor its partnerships [REDACTED]

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Vice-President \(Academic\)](#); [ViceProvostEDIAR](#); [AVPA Students](#); [Associate VP \(Academic\)](#); [Millan, Roxanne](#); [Batten, Jennifer](#); [Reid, Brad](#); [Elliott, Renee](#); [Pearcey, Krista Marie](#); [Foley, Tara](#); [REDACTED] [acadadminvp@memu.ca](#); [acadcoordinator](#); [Lokash, Jennifer](#); [President, The](#); [Registrar, Memorial University of Newfoundland](#); [Andersen, Cathryn](#); [White, April](#); [vpindigenous](#); [REDACTED] [tanyanoseworthy@gov.nl.ca](#); [susanlacey@gov.nl.ca](#); [Policy](#); [REDACTED]
Cc: [REDACTED]
Subject: Feedback on Memorial's draft Indigenous Verification Policy
Date: Friday, May 2, 2025 2:42:14 PM
Attachments: [Board of Regents letter - \[REDACTED\].pdf](#)

To Whom It May Concern:

Please see attached my letter providing feedback on Memorial University's Draft Indigenous Verification Policy. Thank you for your attention to this important issue that seriously affects thousands of Indigenous people in and from Newfoundland and Labrador. Please do not hesitate to reach out to me if you would like to further discuss the matters I raise in my letter.

Sincerely,

[REDACTED]

[REDACTED]

Board of Regents
Memorial University of Newfoundland
230 Elizabeth Avenue
St. John's, NL A1C 5S7

Dear Memorial University Board of Regents,

I am writing to provide feedback on Memorial University's Draft Indigenous Verification Policy.

[REDACTED]

With this proposed policy, Memorial has forfeited the scholarly principle of the pursuit of knowledge in favour of political manipulation and control of the academy. In doing so, it is creating an unsafe and repressive environment for students and scholars.

Universities are based on the principle of the free, open, and critical pursuit of knowledge. And yet, rather than being grounded in this principle, the draft policy is based on, first, federal recognition of Indigenous people, and second, the politically motivated views of Indigenous political organizations. It therefore excludes Inuit represented by NunatuKavut Community Council (NCC)

[REDACTED] In centering federal recognition, it ignores the Indigenous knowledge – which is local, traditional, shared, and largely oral – that is held by the Inuit community of south-eastern Labrador. It is now widely recognized in Indigenous studies that considering such community-based knowledge is essential for the ethical development of policies affecting Indigenous peoples. While Memorial University did carry out consultation prior to drafting this policy,

[REDACTED] Consultation without genuine engagement with and inclusion of Indigenous contributions is bad faith and meaningless.

As a striking example of the way that the policy ignores local Inuit knowledge, consider this line from the policy: "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." This assertion ignores the historical fact that the then Labrador Metis Association (LMA, now NunatuKavut Community Council) was fully engaged in the fight for constitutional Indigenous rights in the early 1980s as a member organization in the then Congress of Aboriginal Peoples (CAP), which successfully negotiated for Métis constitutional rights. At that time, CAP included the Red

River Métis, non-status First Nations people from across the country, and Inuit of south-eastern Labrador. In fact, members of the LMA were physically present as representatives at the constitutional negotiations in Ottawa.

[REDACTED] To say that the 1982 amendment is the “basis” of Memorial’s policy, and yet to simultaneously ignore and erase NunatuKavut’s predecessor organization’s full participation in the creation of that amendment shows how deeply flawed, illogical, and discriminatory this policy is.

In addition to ignoring knowledge from the southern Labrador Inuit community, this policy ignores a widespread scholarly critique of what has been called the “politics of recognition.”ⁱⁱ Many scholars have critiqued federal structures of recognition as a colonial effort to control, categorize and eventually eliminate Indigenous people. For example, in her landmark book, *Decolonizing Methodologies*, Māori scholar Linda Tuhiwai Smith critiques attempts to determine who is a “real” Indigenous person as fragmenting and marginalizing those who speak for Indigenous issues while also “silencing and making invisible the presence of [less recognized] groups within the Indigenous society.”ⁱⁱⁱ In basing its policy on federal government recognition, Memorial’s draft policy is also not in keeping with constitutional law or with domestic and international human rights.^{iv} Moreover, policies and categories of recognition are ever-changing (as seen in Bill C-31 in 1985, Bill C3 in 2011, and Bill S3 in 2019, all of which radically altered who is recognized as Indigenous in Canada), showing that they have no stable relationship to Indigeneity. This instability is especially apparent in Newfoundland and Labrador, where the erasure of *all* Indigenous people at Confederation has led to a very recent and ongoing struggle for Indigenous recognition across the province. There is, shockingly, no recognition of our province’s unique historical, political, and legal context in Memorial’s draft policy. This lack of a critical, local, and historically informed perspective on a policy that will deeply impact Indigenous people is unacceptable.

In excluding Inuit of south-eastern Labrador from recognition, Memorial’s draft policy also blatantly ignores a very large body of scholarly and peer-reviewed research that recognizes and supports the historical and on-going presence of Inuit in southern Labrador, including research from some of Memorial’s most accomplished researchers such as archaeologist Dr. Lisa Rankin and religious studies scholar Dr. Hans Rollmann, as well as books published by Memorial University Press such as *A Long Journey: The History of Residential Schools in Labrador* by Dr. Andrea Procter and *History and Renewal of Labrador’s Inuit-Métis*, edited by Dr. John Kennedy.

Memorial University is choosing to ignore a rich and extensive body of Indigenous knowledge and academic knowledge. Further, despite the policy’s reliance of government recognition, it is nonetheless choosing to ignore the facts that: the federal government has an MOU with NunatuKavut Community Council which states that “Canada has recognized NCC as an Indigenous collective”; that the Province of Newfoundland and Labrador recognizes NCC as the government of an Indigenous community; and that

the Newfoundland and Labrador Court of Appeal has recognized the Indigenous rights of NunatuKavut Inuit. Why then is Memorial choosing to act against this large body of knowledge and recognition?

Sadly, the answer is to be found in political interference and over-reach. The Vice-President Indigenous at Memorial, who led the process resulting in the draft policy, is a member of Nunatsiavut Government (NG). NG leadership, supported by Inuit Tapiriit Kanatami (ITK), a national political organization, has challenged the legitimacy of NCC and its membership. The roots of this inter-Indigenous conflict are historical, going back to the efforts of Moravian missionaries to separate “their” northern Inuit communities from the influence of southern Inuit, and have been exacerbated by conflicts over land and by provincial and federal politics of recognition which have served to further divide the Inuit of Labrador. Yet rather than looking to history and knowledge to better understand and overcome this division, the President of ITK has falsely stated that “the archaeological and historical evidence suggests that the territory claimed by NCC has never been permanently occupied by Inuit.” This is a demonstrably fraudulent claim that should not be accepted by a university. However, Memorial’s draft policy states that to be “recognized” by Memorial, a community must be “accepted as an Indigenous collective by their federally-recognized neighbours.” With this claim, Memorial unquestioningly accepts Nunatsiavut and ITK’s claims about *another Indigenous community*, and aligns itself with false claims from these organizations, an approach that has no basis in law or ethics. Indigenous peoples have always had conflict, going back to before contact and being exacerbated by the politics of recognition. There are examples of such conflicts across Canada. As one of many examples, the Manitoba Metis Federation (MMF) does not accept the Indigeneity of their neighbours, the Metis Nation - Ontario. And yet, Memorial University accepts without question Indigenous verification from the Metis Nation - Ontario, despite the fact they are not accepted by their neighbour the MMF. This contradiction suggests that Memorial’s draft policy is not actually concerned with neighbourly recognition but with responding to political demands from Nunatsiavut and ITK that Memorial exclude NunatuKavut Inuit.

I am extremely concerned about the effect that this policy will have on NunatuKavut youth who attend or are considering attending Memorial University. NunatuKavut students will be denied access to Indigenous opportunities, resources and services. This will have profound social and financial impacts on students coming from remote communities in southern Labrador, where under 60% of the community have a high school diploma, unemployment is at 44%, and the median after-tax income is only \$36,278.^v But I am equally concerned with what this will mean for the educational experiences of NunatuKavut students at Memorial. How will they confidently explore their own identity, history, and community if their university says that that community and identity do not exist?

While the draft policy does not directly address academic freedom, if passed, it will no doubt harm academic freedom at Memorial by determining who is eligible to be hired, whose research is supported, and who feels free to speak. The policy will have the effect of cutting off student and faculty research into southern Labrador Inuit by denying funding and recognition for such work.

If this policy is passed, Memorial University will no longer be a safe and inclusive place for NunatuKavut Inuit students. It will no longer be able to call itself the university of Newfoundland and Labrador, while openly excluding and discriminating against a large portion of the province’s youth. Indeed, it will no longer be a university, except in name only, as it will be prioritizing political control over the pursuit of

knowledge. If this policy is passed, I will recommend [REDACTED] that they not attend Memorial University as it is an unsafe and repressive place for Indigenous people. It would deeply sadden me to have to say this about a university of which I have always been so proud.

This is not only an issue for NunatuKavut Inuit. This draft policy should be opposed by all students, scholars, and members of the public who value universities as places where knowledge can be freely and openly pursued, without political repression. As we look to universities in the US, where political overreach and an atmosphere of fear currently prevail, we can see the results of the path that Memorial is on. Whether or not this policy directly affects you right now, I call on all supporters of the role of a free university in society to actively and vocally oppose this draft policy.

Sincerely,

[REDACTED]

ⁱⁱ Coulthard, Glen. *Red Skin, White Masks: Rejecting the Colonial Politics of Recognition*. U Minnesota P, 2014.

ⁱⁱⁱ Smith, Linda Tuhiwai. *Decolonizing Methodologies: Research and Indigenous Peoples* [1999]. 3rd Edition. Bloomsbury, 2021. pp. 116.

^{iv} Metallic, Naiomi, and Cheryl Simon. "A Human Rights and Legal Analysis of the Understanding Our Roots Report," December 2023, digitalcommons.schulichlaw.dal.ca/cgi/viewcontent.cgi?article=1085&context=reports.

^v Martin, Debbie. *WE HAVE ALWAYS BEEN HERE: Rebuttal to the 2021 Nunatsiavut Government report entitled "Examining the NunatuKavut Community Council's Land Claim*. Online document. May 2022.

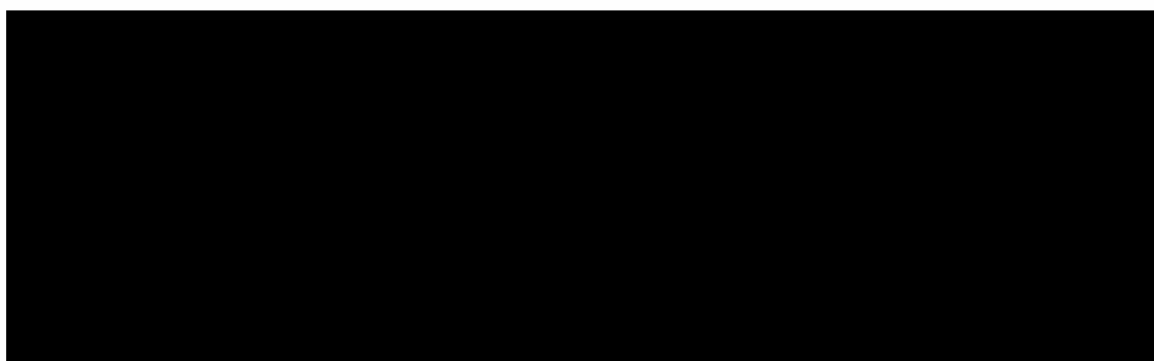
From: [REDACTED]
To: [Policy](#)
Subject: Indigenous Verification policy and procedures
Date: Friday, May 2, 2025 2:57:41 PM
Attachments: [Indigenous Verification Policy.pdf](#)

Hi,

I've added some comments to the attached pdf of the policy and procedures. I'm happy to discuss if more clarification is needed.

Cheers,

[REDACTED]



**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).

Citizenship/Membership: 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.

First Nation: 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.

Frivolous, vexatious, or extraneous reporting: ‘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.

Indigenous: 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

Inuit: 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.

Material gain: 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.

Métis: 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.

Relationality: 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.

Reputational benefit: 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.

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

Self-declare: (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.

Self-determination: 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.

UNDRIP: 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.

University Community: 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.

Verification: 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 Section 35 of the *Constitution Act, 1982*. 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

Summary of Comments on Indigenous Verification Policy.pdf

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T Number: 1 Author: [REDACTED] Subject: Highlight Date: 5/2/2025 1:51:25 PM -02'30'

It is hazardous to put such authority in the hands of a single individual. A committee should consider the allegation.

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 Memorial's Privacy policy. 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 Information and Privacy Access Office website. Questions on the collection of personal information to support the Indigenous Verification Policy may be addressed to iap@mun.ca

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

Information Management policy

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.

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T Number: 1 Author: [REDACTED] Subject: Highlight Date: 4/7/2025 2:29:48 PM -02'30'

This requires clarification. Consider a Faculty/School committee awarding scholarships where there may be multiple scholarships defined for Indigenous students. Is the committee required to submit a separate request for each scholarship even if the same student(s) are under consideration? How about during the following semester, do they need to ask again? If no, then when?

For such scholarships, should the committee first ask students to self-identify and then the committee will follow the verification process?

- 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.

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T Number: 1 Author: [REDACTED] Subject: Highlight Date: 5/2/2025 1:55:29 PM -02'30'

It seems under this Pathway that it is the Committee that is making the verification decision, which seems to be contradictory to the right to self-determination and the policy.

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.

From: [REDACTED]
To: Policy
Subject: Feedback re: Indigenous Verification Policy Draft
Date: Friday, May 2, 2025 3:12:20 PM

Hello,

I'd like to offer some feedback on the draft Indigenous verification policy.

[REDACTED]
 [REDACTED]
 [REDACTED] this policy is likely to affect student discourse at MUN, especially in courses where identity, colonialism, and/or Indigenous topics are discussed, [REDACTED]
 [REDACTED]

For the most part, I restrict my feedback to the implementation of the policy.

1. Verification Committee – the draft policy refers to the “Terms of Reference for the Verification Committee” but there are no terms of reference within the document. Is the make-up and functioning of the committee part of the policy?
 - a. For example, who will comprise the committee and how long will they serve for? Will they be appointed, or selected another way? Will there be a number of people on the committee, with a certain number of them who rotate in for a specific verification request, or will the whole committee be involved in each verification? Will the committee be made up of a diversity of Indigenous (and potentially non-Indigenous) people from diverse places?
 - b. Verification work also has the potential to create additional burdens on Indigenous faculty members (presuming they will be involved) – will they be provided with course remissions or an alternative form of support/compensation? How will the university ensure that the demands of the committee are balanced with the teaching and supervision needs of their departments, as well as their own research?
 - c. There should also be considerations re: the need for transparency and accountability re: this form of decision-making, while also recognizing that committee members may face potential backlash and consequences within their research and teaching – both at MUN, and beyond. How will this be navigated?

2. Verification Process (1.0 A and B, pg 10):
 - a. Language related to this policy, making the expectations and procedures clear and accessible, should be included in every Indigenous-specific opportunity, such as in job postings and scholarships. It's important to make what is expected clear from the start so that people are aware of what they are committing to when they apply for these opportunities.
 - b. While I believe that it makes sense for the administering body for the opportunity to liaise between the applicant and the committee to request materials and follow-up with the committee's decision, the university/committee should develop some sort of template or language that is thoughtful and sensitive for the administering body to use and draw on. Your average dept head/scholarship officer/admin staff may not have the requisite knowledge or language. Since the policy emphasizes that all members of the university are responsible for upholding the policy, there needs to be resources to assist with doing so in an ethical and responsible manner for all those involved.
3. How will the privacy of applicants be ensured in communications with external bodies? For example, for an Indigenous scholar who is part of a hiring process – if they are seeking a new position at MUN and are unsuccessful or the hire is delayed, but word gets back to their uni/dept because of the verification process, this may create the potential for them to be negatively impacted. While this is hypothetical, it must be very clear to any external body contacted that confidentiality may be preferred/required – not because of the verification process itself (which may need to be destigmatized) but for professional or personal reasons.
4. In terms of the “recognized Indigenous collective” criteria, I want to flag a few points, though I know there's a strong chance they have been raised and considered already.
 - a. Re: acceptance as an Indigenous collective by federally-recognized neighbours (pg 3) – what is the threshold for this? If a situation were to occur where one of the Inuit groups recognized the NCC, while the others continue not to, how would the university navigate that? This does raise the question that some scholars have flagged re: institutions getting involved in political disputes between Indigenous communities. While it's purely hypothetical at the moment, I wanted to flag it as something that remains unclear, since it may also have implications for people from Indigenous communities in other places who are in political disputes with some of their Indigenous neighbours. (Though to be fair, in the other 2-3 contexts I can think of, those involved would likely still have access via “Pathway A” since their Indigeneity itself isn't in question, but either their distinct collective and/or their rights are not federally recognized).
 - b. Re: 2.2 Section 3.1.2 of the Policy (pg 11-12, particularly the “letter from an official representative” - there can be disputes within Indigenous nations, whose members form a diverse civil society with disagreements and conflicts like any other “community” or “collective.” For example, conflicts may relate to differential access to status or band membership, the ability to live on reserve, or strained relationships with elected leaders. I think that the pathways may be flexible enough to allow for this,

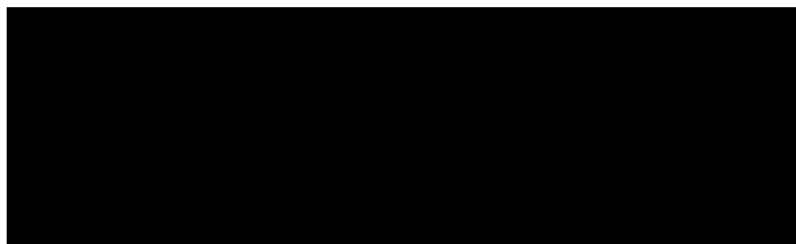


The policy's pathways and the committee's considerations must have principles that are careful to avoid replicating gendered and/or sexualized oppression.

5. One final thing - I noticed that the report "Who are you responsible to?" from April 2024 talks about Indigenous knowledges, and the difference between having citizenship/membership in an Indigenous nation and having substantial connections to community and culture (pg. 40, 59). The latter, as it describes, is particularly important if the role/opportunity in question is meant to be grounded in expertise with "Indigenous knowledge" (40). I understand "Indigenous knowledge" as potentially referring to personal experiences of colonialism, racism, sexism, etc., and/or to collectively-held and intergenerational land-based knowledge, oral traditions, Indigenous legal orders, traditional governance, etc. I think that this issue is important, especially since it was raised in the report, but I don't think that it can be addressed through this policy. It may need to be assessed on a case-by-case basis within the descriptions of Indigenous-specific opportunities, and then on the other end, through the materials that verified applicants submit (whether for scholarships, faculty positions, etc.). I wanted to note this as something to recognize as related to, but which goes beyond, this particular policy.

I hope that the feedback above is helpful. While I am happy to be contacted for further information or clarification if needed, I would prefer this feedback to remain confidential, unless asked for my permission.

Thank you and best of luck with this difficult work,



From: [President, The](#)
To: [Policy](#)
Cc: [ypindigenous](#)
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Friday, May 2, 2025 3:31:11 PM

Please see below.

I have acknowledged receipt on behalf of the President's Office.

Best regards,

Rose

Rose M. Frew, Executive Assistant to the President (Correspondence)

President's Office, Room A-2028

Arts and Administration Building | 230 Elizabeth Avenue

Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7

t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From: [REDACTED]

Sent: Friday, May 2, 2025 3:16 PM

To: President, The <munpres@mun.ca>

Cc: [REDACTED]

Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,

I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED]
[REDACTED] This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]
[REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
[REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

[REDACTED]

From: [REDACTED]
To: Andersen, Cathryn
Cc: [REDACTED] Policy
Subject: [REDACTED] response to Draft Indigenous Verification Policy
Date: Friday, May 2, 2025 3:36:30 PM
Attachments: [REDACTED] Re Verification Policy.pdf

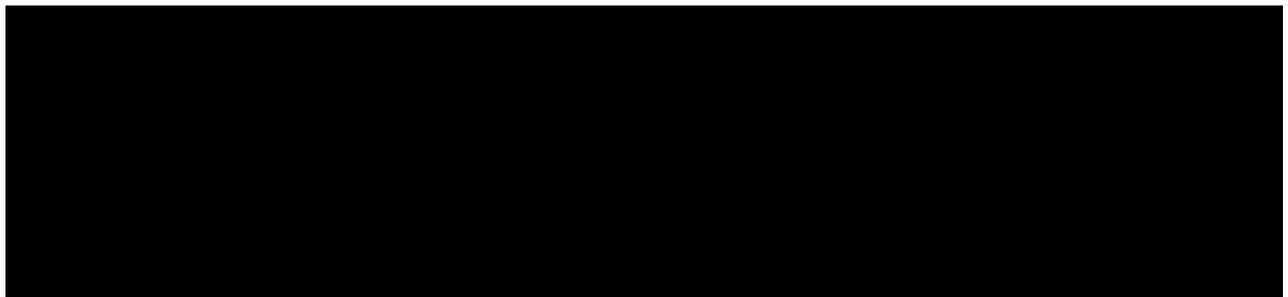
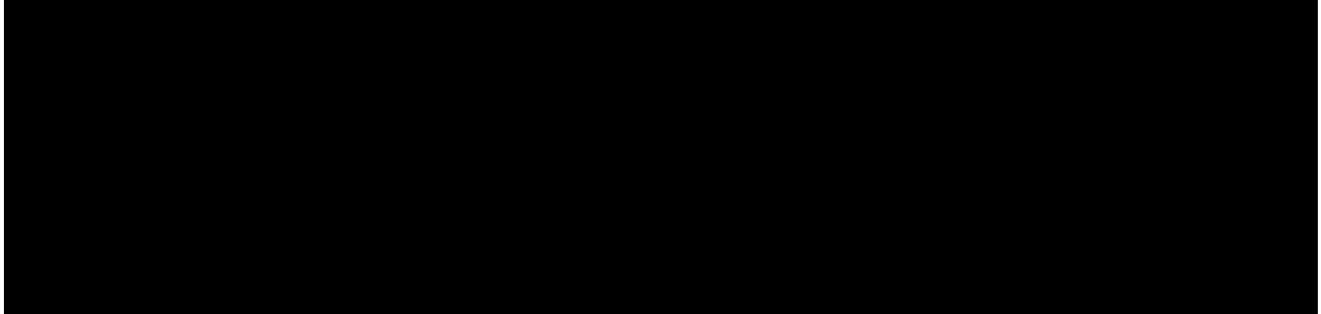
Good afternoon,

Please see the attached letter [REDACTED]

Kind regards,

[REDACTED]

[REDACTED]



██████████ there was much effort, and care taken, to create this document and that the policy encompasses a sensitive issue within the university, as well as with some external communities. ██████ also observed that the commitment to engagement of multiple levels of interested parties by your team was demonstrated clearly.

In ██████ discussions ██████ noted that there are several places in the document that could benefit from clearer language. Suggested revisions could clarify or better explicate contentious themes and possibly alleviate potential concerns of this committee and perhaps other members of Memorial. In order to improve the document, ██████ suggest the following:

- 1) On p.1 in describing the purpose, it could be emphasized that the verification process is for use for internal purposes only. Also, the reason for having such a policy could be mentioned here (and not waiting until the bottom of p.3, and on p.5, in doing so).
- 2) In section 3.0 Verification Pathways, specifically regarding 3.1.3 Pathway C, the way it currently reads, it is easy to conject that the Verification Committee would have to make a distinction on who can call themselves Indigenous and who cannot. In this pathway, individuals do not have membership/citizenship with a Recognized Indigenous Collective and thus cannot “prove” they are Indigenous. It is quite possible that the Verification Committee would have to determine if that individual can be considered Indigenous. If so, then this would contradict one of the fundamental tenets of the policy – “Memorial University does not have the authority to decide who is or is not Indigenous..”. ██████ concerned that this section is irreconcilable with the rest of the policy.
- 3) ██████ suggests omitting the first paragraph of Section 6.1. It is likely unnecessary and such behaviour would be covered by other University policies which are concerned with fraudulence.

- 4) Also in Section 6.1, [REDACTED] the VPI should not be the sole individual who “will determine whether and how to proceed with an investigation of false claims.” Such a responsibility should be handled by a committee, for the protection of all parties, especially for the VPI.
- 5) [REDACTED] noticed that there was no membership of the Verification Committee provided. Who will be represented on this committee? Should this be mentioned in the policy?
- 6) Finally, [REDACTED] suggests there is clarification on how often verification procedures on an individual be performed. Is this a one-time or annual event? If annual, what is the purpose of an annual verification?

Sincerely,

cc:

[REDACTED]
Policy@mun.ca

From: [REDACTED]
To: [Policy](#)
Subject: Support for Memorial University's Indigenous Verification Policy
Date: Friday, May 2, 2025 4:05:31 PM
Attachments: [Memorial University support letter IVP .pdf](#)

Good day,
Please find attached a letter of support for the Indigenous Verification Policy.
Kind regards,

[REDACTED]



May 2nd, 2025

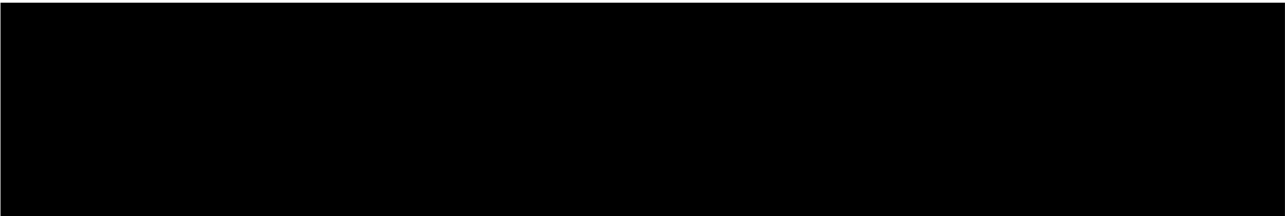
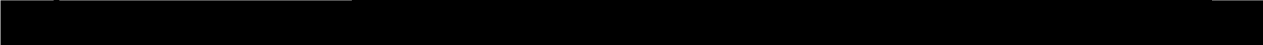
To Whom It May Concern,

I am writing in full support of Memorial University's Indigenous Verification Policy. 

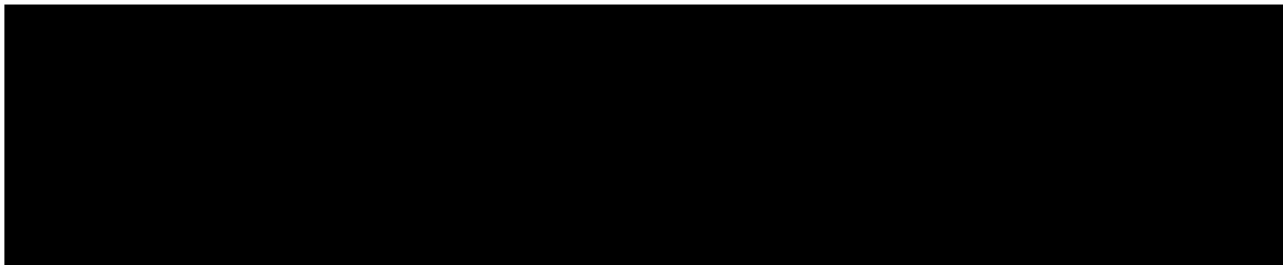
 I want to express my deep gratitude for the development of this important policy, especially at Newfoundland and Labrador's only university. I believe this is a meaningful and necessary step toward genuine reconciliation with Indigenous peoples who choose to study at this institution.



 It ensures that the rights, resources, and support systems intended for Indigenous people are actually accessed by those who are Indigenous, not by individuals who adopt the identity only when it's convenient. 



implementation of this Indigenous Verification Policy is both moving and commendable. This progress must be applauded.



I understand that this policy is not about questioning someone's identity but rather creating a fair and respectful process of verification through recognized Indigenous organizations such as the Nunatsiavut Government or Inuit Tapiriit Kanatami. A policy like this helps ensure safe, culturally respectful spaces for current and future Indigenous students and staff at Memorial University.

Thank you, Memorial University, for taking this crucial step. You are not only supporting Indigenous students and faculty today but also setting a precedent for those who will come after

■ This policy is a strong act of reconciliation, and I sincerely appreciate the time, effort, and commitment that has gone into making it a reality.



Kind regards,



From: [REDACTED]
To: [Policy](#); [REDACTED]
Subject: Response to Memorial University Draft Indigenous Verification Policy
Date: Friday, May 2, 2025 4:06:50 PM
Attachments: [IVP Feedback \[REDACTED\].pdf](#)

Good Afternoon,

I have attached a letter regarding some of my concerns with the draft Indigenous Verification Policy proposed by Memorial University. I understand the deadline for feedback is today and I trust that this has arrived in time.

Please let me know if you have any questions regarding this feedback.

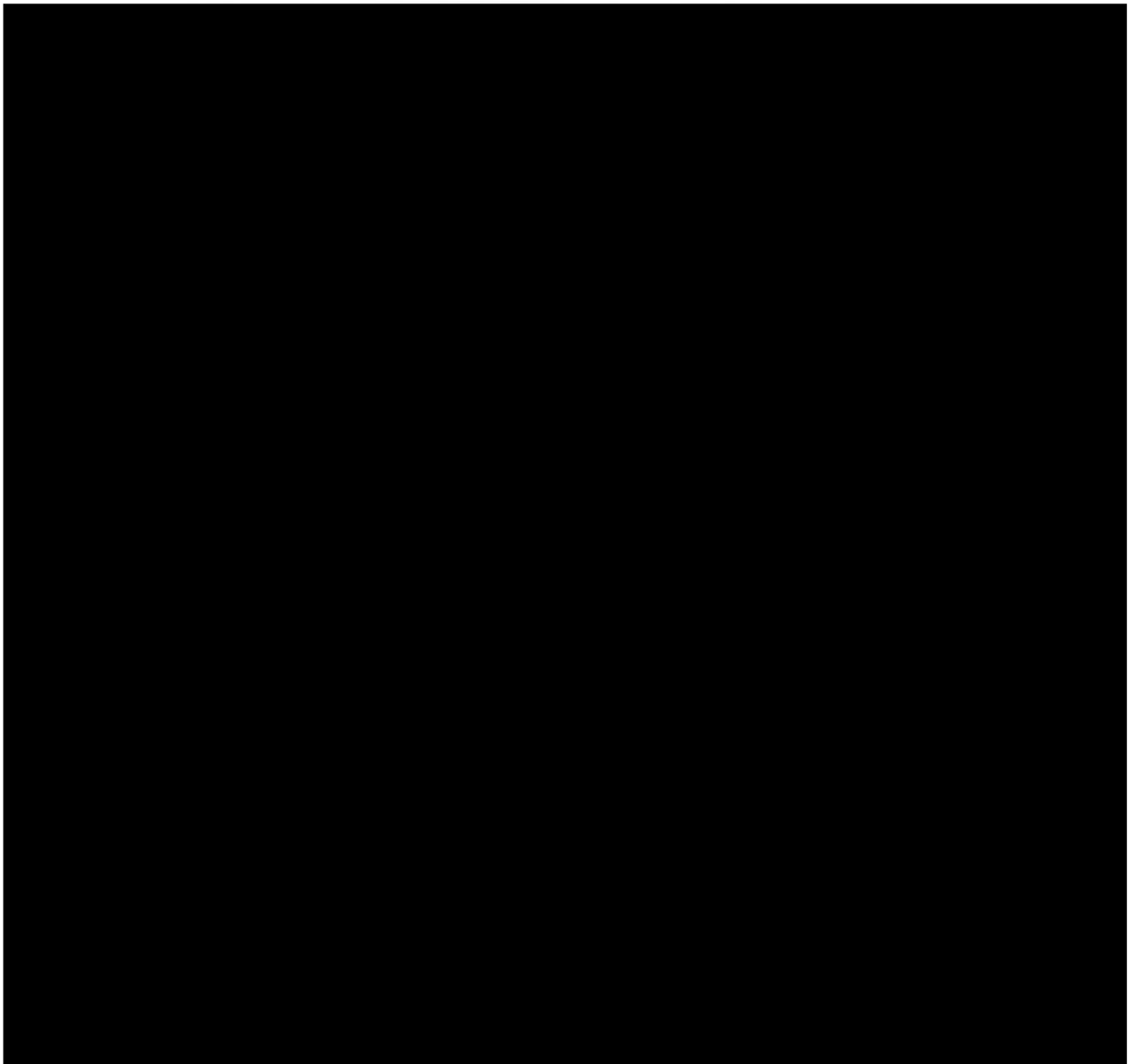
Thank-you,

[REDACTED]



May 2, 2025

To whom it may concern:



[REDACTED]

The additional barriers proposed through the draft Indigenous Verification Policy are both discriminatory and unwarranted. This policy states that Memorial University “does not have the authority to decide who is or is not Indigenous” but is doing exactly that by attempting to put in place a politically based recognition system that aims to empower advocacy groups such as the Inuit Tapiriit Kanatami (ITK) as decision makers where, as an advocacy group, they have no expertise or authority in Indigenous law or validation processes. Were this policy in existence when the Labrador Inuit Association (LIA) was undertaking their own recognition status and claim process. The current policy, would have prevented students of the LIA, which is governed by the Nunatsiavut Government (NG), from accessing opportunities if they were in place prior to the signing of the Labrador Inuit Land Claims Agreement (LILCA) as the Nunatsiavut Government was not established and the associate members accepted at the time by “their federally-recognized neighbours”.

Decisions regarding Indigeneity rest with the federal government and with self-identifying collectives for good reason. Relying on the appropriate decision makers is also important in not perpetuating lateral violence or encouraging political maneuvering of the kind that NunatuKavut Inuit have had to endure [REDACTED]

The Indigenous Verification Policy draft should be immediately withdrawn. There has been a clear misstep here by the Office of the Vice President–Indigenous and a performance review should be conducted. Going forward the NunatuKavut Community Council and any other affected Indigenous organizations should be involved from the outset in an integral and meaningful way if any other Indigenous policy work is conducted at Memorial University.

I could not be more disappointed in Memorial University for supporting this intentional provocation [REDACTED] in support of a political agenda biased clearly against NunatuKavut Inuit.

Sincerely,

[REDACTED]

From: [REDACTED]
To: [Policy](#)
Cc: [REDACTED]
Subject: Policing Identity
Date: Friday, May 2, 2025 4:29:51 PM

Good day,

I am utterly disgusted and heartbroken [REDACTED]
[REDACTED]

Colonial harm has been perpetuated to all Indigenous peoples in this province [REDACTED]
[REDACTED]

[REDACTED] the urban Indigenous community in St. John's continue to be divided, triggered and harmed by this blatant discrimination and lateral violence.

[REDACTED]
In peace and friendship,
[REDACTED]

Sent from my iPhone

From: [REDACTED]
To: [Policy](#)
Cc: [REDACTED]
Subject: Indigenous Verification Policy Feedback
Date: Friday, May 2, 2025 4:47:44 PM
Attachments: [REDACTED]

Hello,

Thank you for providing the opportunity for the university community to review and provide feedback on the draft Indigenous Verification Policy. I have two points I would like to put forward for consideration:

1. [REDACTED]
[REDACTED] what is the anticipated decision timeline for the Verification Committee [REDACTED]
[REDACTED] Is it possible to have that timeline published as either part of the policy or on the website once it is available [REDACTED]
[REDACTED]
2. Under '**Verification Procedure for Applicants 1.0 Verification Process**' the first paragraph refers to the 'administering unit/body' regarding the submission of the applicant's name to the Verification Committee. Is it possible to have the administering unit/body defined so it is clear who should be initiating this process when multiple units are involved? [REDACTED]

Once again, thank you for providing the opportunity for feedback.

Regards,

[REDACTED]



From: [REDACTED]
To: [Policy](#)
Subject: IVP question
Date: Friday, May 2, 2025 4:56:39 PM

Hello, I've been reviewing the policy, in section 4.1 it refers the reader to the ToR for the verification committee. Is this ToR available for the Memorial community to review?

Thanks,

[REDACTED]
Get [Outlook for iOS](#)

From: [REDACTED]
To: Scott, Tina (Regents); voinindigenous; President. The; Policy
Subject: Indigenous verification at MUNL
Date: Friday, May 2, 2025 5:01:53 PM

Good Day,

I'm writing to provide feedback on MUNL's Indigenous verification policy. [REDACTED]

[REDACTED] people who are satisfied with what they read or hear are less likely to take the time to tell someone compared to people who are upset, so I'm taking the time to tell someone.

I've read the policy and I'm really impressed with what MUNL has put together. I've been following the past few years of activity in this area in Canada and the United States and I've read some similar policies at other universities. MUNL is in line with most other existing policies in terms of looking at section 35 rights as a threshold, but MUNL's policy is more inclusive in how it respects Indigenous protocols [REDACTED]

It also recognizes the history of this province as distinct from others, including the part in the policy about being recognized by recognized neighbours. This is inclusive and thoughtful and informed by and respectful of Indigenous histories.

I'm also impressed with the pathways for global Indigenous Peoples. I don't know of other policies that codify this, but if you're engaging with Indigenous ways of being, doing, and knowing, then it would be artificial to draw a line around Canada or North America and exclude everyone else. I'm sure MUNL has hiring policies already that protect the prioritizing of Canadians so there shouldn't be any issue of needing to protect Indigenous people in Canada. This global Indigenous acknowledgement is a piece of the MUNL policy that can really help educate other universities. Universities already have global Indigenous people in their community, even if they don't know it.

I have a couple specific notes that could be considered further. One is your definition of Indigenous. Consider adding something about how Canada uses the term. After the current definition you could add "In Canada" and then explain how it refers to First Nation, Inuit, and Métis.

Second, in 2.1 it's excellent that you include the qualification of First Nation to First Nation, Inuit to Inuit, and Métis to Métis.

Third, in the definition of self-determination you might want to include membership as part of what is determined in self-determination. Groups who want to circumvent parts of your policy are going to try to misuse self-determination to their advantage, so you could say "self-determination with respect to..." instead of "self-determination, which includes..."

I'm going to add more perspective here because I know from watching social media [REDACTED] that you're getting pummeled by some who don't like the policy, one being the group that refers to themselves as Nunatukavut Community Council or NCC. I've

read their public statements, watched their videos on their pages and in the media, and they are really twisting what words and terms mean. They also mis-present their status in Canada.

One thing I've seen and heard multiple times from people associated with NCC is their claim that their current MOU acknowledges they've been determined "capable of holding section 35" rights. They're seriously misleading people with that statement. They leave out the rest of the sentence which is the key part: "...for the purpose of entering into discussions regarding rights recognition and self-determination." The MOU is saying they're only deemed "capable" within a narrow context of being able to sit down and talk, nothing else. It's a hypothetical.

Important to note is that in the MOU where objectives and goals are listed the MOU states that a goal is to "Identify the nature of the rights that NCC may hold" and to "identify the beneficiaries of those rights." The rights they MAY hold. This means not only have no rights been determined yet, but they haven't even identified who would be the beneficiaries if the collective was ever granted any rights under section 35.

Throughout the MOU, you'll notice the repeated use of qualifiers like "may" and "where established" which means nothing's been decided and the government doesn't commit to anything. Another important clause includes "this MOU is not legally binding, is intended only as an expression of good will and political commitment, and does not create, amend, recognize, or deny any legal or constitutional right or obligation on the part of either Party." This means the MOU doesn't recognize any constitutional rights. It would be really irresponsible for any university to consider these MOUs as evidence of recognition as it would effectively mean the university is attempting to go against both Indigenous and federal protocols and make determinations on their own, which is the opposite of what these policies are intended to do.

Lastly the Government of Canada doesn't mention NCC in the same manner as it does with Inuit, Inuit regions, and so on. Where the Government of Canada website mentions Inuit, NCC is not listed, but the four regions are. Where the Government of Canada website mentions CIRNAC partnerships with Inuit, there's a robust list that includes land claims regions and cultural groups but NCC is not in the list. The ICPC also did not include NCC.

I hope you'll be careful with this and not cave to pressure. The MUNL policy is clear, thoughtful, well-written, and as inclusive as it could possibly be.

Wishing you all positive steps forward with this policy.



From: [REDACTED]
To: [President, The](#)
Cc: [Policy; vpinigenous; Dyke, Paula; \[REDACTED\]](#)
Subject: Congress of Aboriginal Peoples - Memorial Universities draft Indigenous Verification Policy
Date: Friday, May 2, 2025 5:37:35 PM
Attachments: [CAP MUN Indigenous Verification Policy draft - CAP Response .pdf](#)

Dear President Lokash,

On behalf of the National Chief [REDACTED] please find attached a letter regarding Memorial Universities draft Indigenous Verification Policy from the Congress of Aboriginal Peoples.

Kind regards,

[REDACTED]
Director of Governance Support | Directrice du soutien À la gouvernance
www.abo-peoples.org/ | [@CongAboPeoples](#) | [CongressAboPeoples](#)

Dr. Jennifer Lokash
President and Vice-Chancellor pro tempore
Office of the President
Memorial University of Newfoundland
St. John's, NL A1C 5S7

May 1, 2025

Dear President Lokash,

On behalf of the Congress of Aboriginal Peoples (CAP), I write to express our deep concern with Memorial University's Draft Indigenous Verification Policy. The proposed draft policy is underinclusive, discriminatory, and harmful. It disregards the legitimate identity of Indigenous populations—such as members of the Newfoundland Indigenous Peoples Alliance (NIPA), the NunatuKavut Community Council (NCC), among others across the country. The exclusion of these Indigenous organizations and their peoples ignores established legal precedents and undermines both constitutional and human rights.

The Congress of Aboriginal Peoples is one of five National Indigenous Representative Organizations (NIO's) recognized by the Government of Canada. Founded in 1971 as the Native Council of Canada, CAP's constituency includes off-reserve status and non-status Indians, Métis and Southern Inuit, and serves as the national voice of 11 Provincial Territorial affiliate Indigenous Organizations (PTO) across Canada. As a national voice, we protect the inherent rights and support the advancement of our community members. We view education as an essential element to erasing the barriers and gaps that have marginalized our community members for so long.

As a matter of brief context, the 2016 CAP-Daniels decision of the Supreme Court of Canada confirmed that Non-Status Indians and Métis are Indigenous peoples and fall within federal jurisdiction, included in Section 91(24) of the Constitution Act. This landmark ruling—together with the principles enshrined in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)—affirms the right to self-determination, recognition of identity, and meaningful inclusion in policy-making processes to all those we represent, which includes Indigenous peoples from NunatuKavut, the Newfoundland Indigenous Peoples Alliance (NIPA) and other provincial affiliate members.

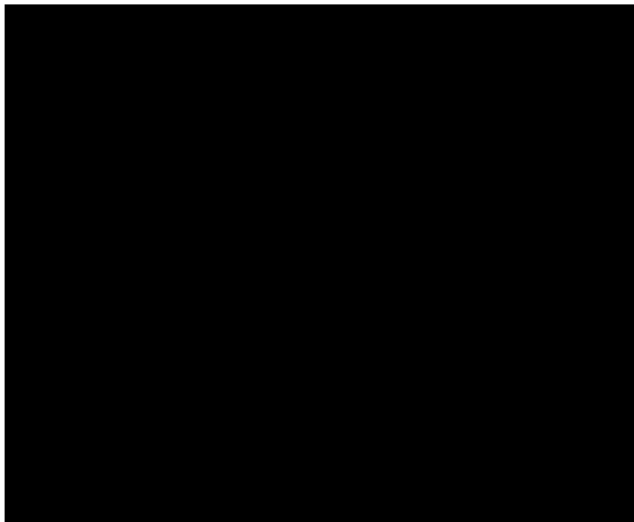
We are alarmed by Memorial University's draft policy, which appears to be intentionally designed to exclude off-reserve status and non-status Indians, unaffiliated Metis and especially, NunatuKavut Inuit, from inclusion and participation in the university as Indigenous peoples. This policy stands in direct contradiction to Canadian law, including UNDRIP and federal legislation such as the *UN Declaration Act, 2021*. It marginalizes entire Indigenous communities whose people have occupied their traditional lands pre-contact and before assertions of Canadian

sovereignty. Furthermore, this draft policy apparently denies and fails to appreciate Indigenous oral histories from the region, academic research and evidence, Canadian court decisions relating the duty to consult, and a myriad of ways in which our Newfoundland and Labrador affiliates have been engaged and included as Indigenous peoples provincially, federally and internationally. It is unconscionable and inexcusable that Memorial has published this draft policy, knowing full well the impact to Indigenous peoples on their own lands and in their own province.

Moreover, while the policy claims to respect self-determination and the principles of UNDRIP, its implementation does the opposite. By conditioning Indigenous identity on federal recognition or acceptance by "Recognized Indigenous Collectives," the policy perpetuates colonial frameworks that have historically served to erase, assimilate, and disempower Indigenous peoples. By this logic, even Inuit in Northern Labrador or others on the island of Newfoundland would not be seen as Indigenous by Memorial's draft policy, prior to their land claims agreements—a notion that is legally, historically and culturally indefensible.

Most alarmingly and practically, the policy in draft form is already inflicting harm on Indigenous students, faculty, staff, elders and the broader community. If left as it currently reads, it will fracture relationships with Indigenous communities, erode trust, and promote lateral violence within the university community. It privileges political gatekeeping over lived identity, and institutional control over reconciliation. This cannot stand.

We urge Memorial University to reconsider this approach and instead work in collaboration with all Indigenous peoples to create a safe, inclusive, and supportive academic environment. This is your opportunity to lead with integrity—by recognizing the full diversity of Indigenous experiences and ensuring that Memorial is a place of true reconciliation, not exclusion. We welcome the opportunity to discuss this further, and together, ensure our communities have a safe and supported space at your university.



From: [REDACTED]
To: [Policy](#)
Subject: Commentary on MUN Draft Policy on Indigenous Verification
Date: Friday, May 2, 2025 5:53:08 PM
Attachments: [REDACTED] [COMMENTS ON INDIGENOUS VERIFICATION DRAFT POLICY AT MUN.pdf](#)

To whom it may concern,
Please find attached for my commentary [REDACTED]
[REDACTED] on the Draft Policy on Indigenous Verification at MUN.

Thanks.

[REDACTED]

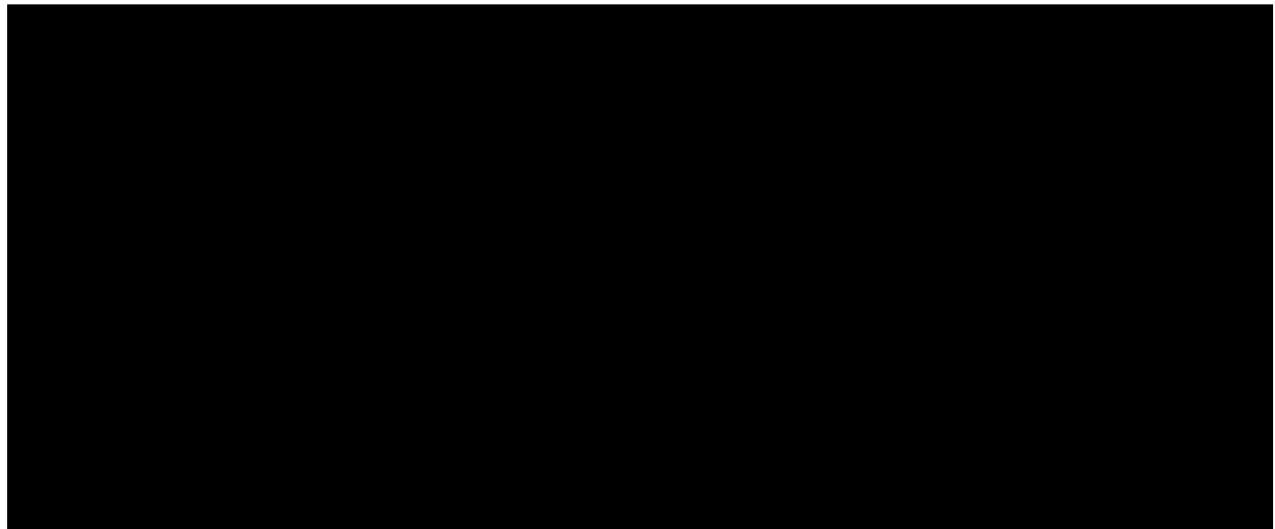
[REDACTED]

May 2nd, 2025

To the Office of the V-P Indigenous

RE: Draft Policy on Indigenous Verification at Memorial University

To whom it may concern,



After reading the draft policy on Indigenous Verification at Memorial University, I have concluded that there are areas of concern that should be addressed prior to moving forward.

Issue #1: Verification Committee. The Draft Policy for Indigenous Verification relies heavily on a ‘Verification Committee’ who have significant influence on the decisions that will be made for individuals applying for verification. The Draft Policy repeatedly refers to the Terms of Reference for the Verification Committee and states that for more information readers should see those terms. At the time of review of this Draft Policy, those terms of reference do not appear to be publicly accessible to the broader public. If they are available somewhere then it certainly hasn’t been made clear where this document is located. Given a significant portion of the implementation of this policy relies on this committee, this information should be readily available to the public.

For example, there is no information about who appoints the committee nor how they are appointed. There is no information on how Conflicts of Interest are handled by the committee nor how applicants can learn about disclosures or discussions relating to their case. There is also no information about how individuals involved in the committee will be protected against retribution for decisions not agreed upon by a Recognized Indigenous Collective. It’s not entirely clear whether this committee will be arms length from political processes nor how it will protect applicants against ideological motivated exclusionary processes.

Given the importance of this Verification Committee for the implementation of the Draft Policy – the lack of answers to the above questions at the time of public consultation is a fatal flaw for the

Draft Policy. I cannot possibly understand why this policy was released without this information being easily accessible to readers.

Issue #2: Pathway A (Primary Documentation from a Recognized Indigenous Collective in Canada). This pathway requires that applicants provide official documentation demonstrating current and unexpired membership in a Recognized Indigenous Collective that has been recognized as holding Section 35 rights. Those not meeting this criterion are directed to Pathway B (Secondary Documentation from Recognized Indigenous Collective in Canada) or Pathway C (Displacement and Disconnect).

My initial read is that *Pathway B* is unclear in its implementation in terms of who constitutes a 'official representative'. Does this mean a community leader? A government representative or a membership committee member? This ambiguity creates potential for abuse by applicants and/or wrongful exclusion.

Pathway C appears to apply in a small subset of circumstances where colonial systems have led to displacement or disconnect, and there is an ongoing effort to connect. While it is noted that other circumstances could be considered, there is inadequate information on what this constitutes, and the arbitrary nature of this explanation creates the potential for the committee to excessively apply its discretion. The description currently provided for *Pathway C* provides too much decision-making power to the Verification Committee without providing enough information about situations applicable to individuals. Coupled with the lack of information about how the Verification Committee is appointed – this is a major problem as there needs to be clear guidelines on which situations apply.

Issue #3: Familial and former recognition. Neither of *Pathway B* nor *Pathway C* considers situations where applicants were formerly members of a Recognized Indigenous Collective but are no longer members. Further, neither Pathway B nor Pathway C considers situations where parents and grandparents are members of a Recognized Indigenous Collective but children are not. While this situation may seem specific and uncommon, keen observers of Indigenous Geopolitics in Newfoundland and Labrador would be aware that this is in fact an incredibly common situation for Labrador Inuit.

These issues will also become increasingly common in the future as nearly 2,000 Labrador Inuit live in the Upper Lake Melville region which is just outside of the Land Claim Boundary. The next generation in most of these families would not qualify for membership in Nunatsiavut based on geographic rather than necessarily cultural or ancestral reasons. This has already become an issue that has led to younger generations being ineligible for membership and subsequently joining the NunatuKavut Community Council while parents and grandparents are members of Nunatsiavut.

The proposed Draft Policy, as it currently is written, provides no context of this reality and no pathway for individuals in these families to have access to Indigenous specific opportunities. Those reviewing this feedback should strongly consider whether they wish to find themselves in a situation where they are furthering colonial exclusion practices for individuals coming from families who have Section 35 rights.

Issue #4: Disenfranchisement. Neither of *Pathway B* nor *Pathway C* considers the situation where applicants have been disenfranchised by membership review practices inappropriately applied by a Recognized Indigenous Collective. There are many examples from across Canada where membership practices by various Recognized Indigenous Collectives have led to a wrongful loss of membership/citizenship for individuals. Often courts or other costly formal proceedings are required to restore membership/citizenship but this is a time consuming and costly process that presents numerous barriers for those from certain socio-economic backgrounds. There is no consideration of the above context in the Indigenous Verification Policy. I will provide several specific examples that the office of **V-P Indigenous** would undoubtedly be aware of but these contexts have not been reflected in the Draft Policy verification pathways.

Example One: In 2013, the Nunatsiavut Assembly introduced an Amendment to the Beneficiary Enrolment Act. This amendment did two things. First, it required that all members must reapply for membership when they reach 19 years old. Second, it allowed for membership reviews and challenges to be undertaken to remove individuals on a case-by-case basis who may have been wrongly enrolled on the registrar.

The Nunatsiavut Assembly Hansard from the debate around this Amendment shows that the reapplication at 19 policy was intended to be low risk process for applicants and that the membership review procedure was intended to be used sparingly as a mechanism for dealing with specific individual cases. For the first several years following this Amendment, it was largely used appropriately on a case-by-case basis.

However, contrary to its original intention, beginning in 2018 the membership ‘review’ policy started to not be used sparingly and has been used to remove nearly 300 members from Nunatsiavut’s registrar, many of whom are youth reaching 19 and attending University (information sourced from Nunatsiavut Hansards). This reduction constitutes a loss of nearly 4% of the total membership in Nunatsiavut from 2018 to 2024 with nearly all of these changes occurring in Upper Lake Melville and the Canadian Constituency.

This process has been led by the First Minister of Nunatsiavut in concert with the Nunatsiavut Executive Council who have provided guidance, workshops and legal advice to the regional membership committees and the Inuit Membership Appeals Board. It also coincided with the appointment of a Chair of the Inuit Membership Appeal Board who had become a vocal opponent of members outside of Nunatsiavut having membership, especially those in the Upper Lake Melville region.

Members of the Nunatsiavut Assembly were only recently made aware of this apparently coordinated membership cull and were given no vote or opportunity to question the systematic rather than individual nature of these processes.



Example Two: The Labrador Inuit Land Claims Agreement provides multiple pathways towards membership. One such pathway allows for any individual with 25% or more Labrador Inuit ancestry to automatically qualify for membership/citizenship regardless of other criteria. According to Hansards for the Provincial House of Assembly, the Minister of Justice at the time of the introduction of this legislation ratifying the Land Claims Agreement stated that this clause would allow individuals with 25% or more Inuit ancestry who were within the Labrador Métis Nation to join Nunatsiavut. This clause was critical to allowing the agreement to state that it would be the only Inuit land claim in Labrador.

This was clearly the understanding of the legislation at the time of its introduction and correspondingly Nunatsiavut memberships were extended to many families in southern Labrador including many who were part of the Labrador Inuit Association for many years [REDACTED] who met this criterion.

However, over the past 15 years, at the direction of the Nunatsiavut Executive Council and legal services, membership committees have been directed to apply an interpretation different than the original understanding of the legislation. In this new interpretation only Inuit ancestry directly from within the Labrador Inuit Land Claim Area would be included in ancestral calculations. This new legal interpretation has been used to justify removal of individuals who would otherwise exceed 25% Inuit ancestry but who had some of that Inuit ancestry from residents outside Nunatsiavut. Countless individuals, many of whom have been members of LIA/Nunatsiavut for decades have been purposefully disenfranchised due to this policy.

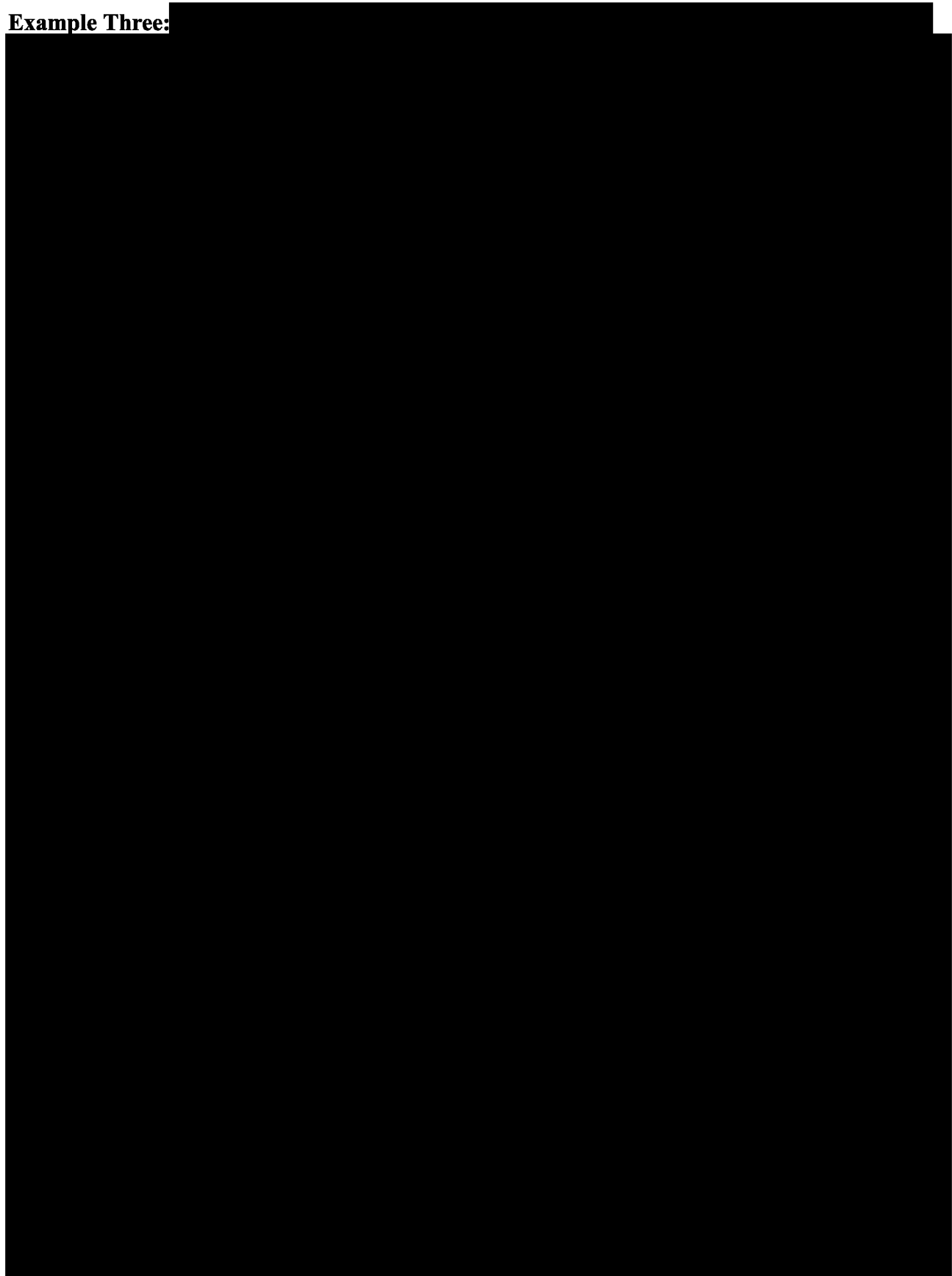
The courts have twice ruled against this practice including in *Blake v. Nunatsiavut (First Minister)*, 2012 FC 1464 where Justice Zinn stated

“In any event, if it was determined that an ancestor’s blood quantum only counted towards an applicant’s Inuit ancestral blood quantum if that ancestor was born in the Labrador Settlement Area, that too is unreasonable. Absent clear and unambiguous language to the contrary, one does not lose one’s ancestry simply because of where one is born... it appears that the Appeal Board discounted the blood quantum of most ancestors based its interpretation that birth in the Labrador Settlement Area was a requirement of being “Inuit” as defined by the Agreement. However, as was noted by Justice Kelen at para 29 of Mugford, the definition of “Inuit” in the Agreement makes no reference to having been born in the Labrador Settlement Area”.

Despite these rulings, Nunatsiavut’s Membership Committees have continued to employ this practice of not counting Labrador Inuit ancestry from outside the Labrador Inuit Land Claim Area in its ancestry calculations. [REDACTED]

[REDACTED] The ongoing use of this practice means they have continued to completely disregarded the previous court findings and continue to disenfranchise members with this change in interpretation. Most individuals removed via these practices have since joined the NunatuKavut Community Council.

Example Three:



While one can accept that every situation cannot be covered by a given policy, the V-P Indigenous Office are undoubtedly aware of these situations of disenfranchisement but have chosen to not present any pathway applicable for individuals who find themselves in these difficult circumstances.

In its current form, it is hard to not see that the Draft Policy could be viewed as a codification of disenfranchisement of hundreds of individuals in Labrador who have spent periods of their life as Section 35 Rightsholders.

Issue #5: Pathway A allows for individuals to be eligible for opportunities without requiring any Indigenous ancestry, only citizenship. Many Indigenous nations will allow non-Indigenous individuals to receive membership and associated benefits per customary practices. For example, the Labrador Inuit Land Claims Agreement allows some multigenerational residents of Nunatsiavut to be eligible for membership in Nunatsiavut without having any Inuit ancestry. These types of practices should not be confused with 'being' Indigenous, especially as it relates to Indigenous specific opportunities such as scholarships or academic positions. The draft policy as it is currently proposed does not place any ancestry requirements and could facilitate individuals without Indigenous ancestry being selected above individuals with Indigenous ancestry.

confusing to see how this requirement has not made its way into the policy.

Issue #6: Pathway A provided a list of organizations from which an active membership card or other formal documentation would be sufficient for being a part of a Recognized Indigenous Collective. This list of organizations includes the Métis Nation of Ontario (MNO). MNO has been formally recognized as a Section 35 rights holding organization by the Government of Canada. However, representatives of the crown including the Minister of Northern Affairs have stated that the MNO have additional work to do to prove their legitimacy, and most regional First Nations and other Métis Organizations oppose their recognition. This issue has resulted in the withdrawal of Bill C-53 and the collapse of the Métis National Council. Much of this dispute is in relation to the MNO recently accepting additional communities into their organization beyond those covered under the frameworks following the Powley case. According to submissions to the Senate Subcommittee on Bill C-53, this included admitting over 10,000 new individuals prior to even determining whether historic Métis communities existed in their connected regions.

While I do not believe it would be useful for me to offer an opinion on the decision for including (or excluding) various Recognized Indigenous Collectives, it is difficult to not compare the situation here with the approach taken towards the NunatuKavut Community Council (NCC). Currently the Draft Policy recognizes the entirety of the MNO membership, including those recently added with questionable claims, while not recognizing any membership from within NCC including those who have formerly held Section 35 rights or who have been disenfranchised by Nunatsiavut membership practices. Institutions of higher learning are certainly capable of recognizing that there are grey areas and the Draft Policy should reflect that.

Possible remedies:

Issue #1: Release the terms of reference for the verification committee and request public commentary on the terms before adopting. Do not move forward with any final policy until this has been completed.

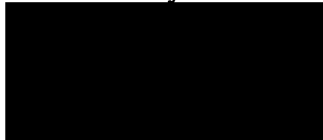
Issue #2: Provide clarification on Pathway B and more information on Pathway C.

Issue #3 & #4: Alter Pathway C to include a mechanism for individuals who have a legitimate case for recognition but have been disenfranchised through membership processes. Past evidence of long-term recognition as a Section 35 rightsholder should be considered adequate. I.e. individuals with Indigenous ancestry who can prove that they have been members of a recognized Indigenous collected for 10 years or more should be considered Indigenous for the purposes of this policy. There is no circumstance where MUN should be involved in denying rights for individuals who lose their membership at 19 in Nunatsiavut.

Issue #5: Require an attestation of Indigenous ancestry and a rightsholding card for specific types of positions or awards.

Issue #6: This is a challenging issue. Addressing Issues #3 and #4 would help alleviate some of the contrast in approaches. Acceptance of MNO including the new communities is hard to square with its policy on NCC.

Thanks for your consideration.



From: [REDACTED]
To: [Policy](#)
Subject: FW: Indigenous Verification Policy
Date: Friday, May 2, 2025 5:54:31 PM
Attachments: [2025 05 02 final response to MUNs draft IVP.docx](#)

Apologies I forgot to attach the document!

Thanks!

[REDACTED]

From: [REDACTED]
Sent: May 2, 2025 3:24 PM
To: Policy@Mun.ca
Subject: Indigenous Verification Policy

Good day –

I note the policy is open for consultation to members of the University community: would it be possible for Inuit Tapiriit Kanatami to provide a submission? We have already prepared one, which is broadly supportive of the Policy.

Thank you!

[REDACTED]

Friday, May 2, 2025

Dr. Jennifer Lokash
President and Vice-Chancellor Pro Tempore
Memorial University of Newfoundland
P.O Box 4200
St. John's, NL
A1C 5S7

By email: president@mun.ca

Ms. Catharyn Andersen
Vice-President (Indigenous)
P.O Box 4200
St. John's, NL
A1C 5S7

By email: vpindigenous@mun.ca

Re: Inuit Tapiriit Kanatami recommends revisions to Memorial University of Newfoundland's draft Indigenous Verification Policy

On behalf of Inuit Tapiriit Kanatami ("ITK"), the national organization that represents Inuit in Canada, I want to express support for the Memorial University of Newfoundland ("MUN") draft Indigenous Verification Policy ("IVP").

ITK's members are the Inuit Treaty Organizations of Canada: the Nunatsiavut Government (*Labrador Inuit Land Claims Agreement*); Makivik (*James Bay and Northern Quebec Agreement, Nunavik Land Claim Agreement*); Nunavut Tunngavik Incorporated (*Nunavut Land Claim Agreement*); and the Inuvialuit Regional Corporation (*Inuvialuit Final Agreement*).

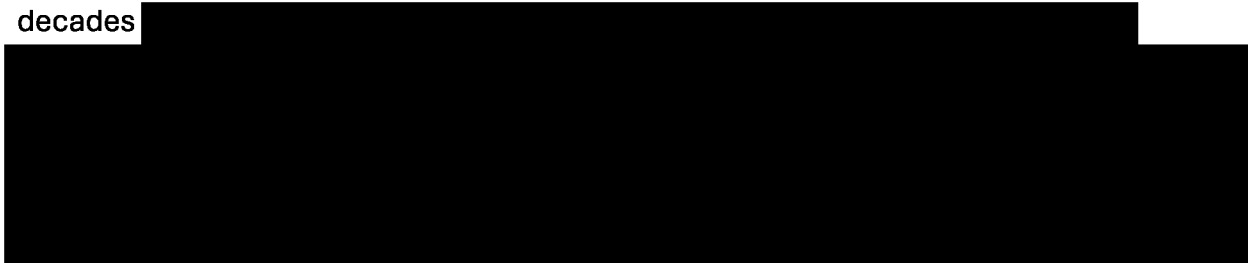
ITK was formed as Inuit Tapirisat of Canada from shared concern among Inuit leaders about the status of land and resource ownership and development in Inuit Nunangat (the Inuit homeland). ITK's early leadership envisioned a blanket land claim to Inuit lands in the Northwest Territories and Nunavik given the immediate pressures facing these territories. Nunatsiavut in northern Labrador would negotiate their land claim later into the 21st century.

The pace of negotiations with the Crown meant that it took Inuit across Canada over three decades to achieve constitutionally protected treaty rights. During that period, Inuit contributed to the development of the Canadian Constitutional protections for treaties, demonstrating the extreme and protracted efforts of Inuit to secure recognition of Inuit

rights through modern treaties. The recognition and identification of Inuit rights-holders was a hard-fought struggle for Canadian Inuit.

The Inuit experience with achieving recognition of our rights means ITK strongly supports efforts by governments, educational institutions and civil society to ensure that material benefits designed to support Inuit serve Inuit, as opposed to supporting those who may only claim to be Inuit.

Inuit identity fraud is on the rise in recent years, a concrete example is a 2024 Nunavut Court of Justice decision where Karima Manji was convicted of Inuit identity fraud for fraudulently claiming Inuit ancestry within Nunavut and accessing material gain for decades



When Inuit Identity Fraud is identified through the IVP Committee

The draft IVP identifies Compliance processes in the abstract, identifying several potential procedures to deal with situations of non-compliance. ITK recommends that the Memorial University Office of the Vice President (Indigenous) be tasked to identify and specify the various existing procedures to deal with non-compliance. These procedures should be reviewed by the Indigenous Verification Committee to identify any gaps within policies or collective agreements, as well as to identify recommendations to the Office of the Vice President (Indigenous) to improve compliance with the IVP.

Definition of Recognized Indigenous Collective

The four Inuit-Crown Treaties within Canada are constitutionally recognized and affirmed through section 35 of the *Constitution Act, 1982*. Each of these treaties was negotiated between Inuit rights-holders and the Crown and recognizes and affirms the Inuit rights holding collectives and is accompanied by federal legislation.¹ Further, these Inuit regions are also federally recognized within the Inuit Nunangat Policy and the federal Cabinet Directive on the implementation of the Inuit Nunangat Policy. I have attached both of these documents for your reference in Appendix A.

¹ *James Bay and Northern Quebec Native Claims Settlement Act*, S.C. 1976-77, c. 32 and the *Nunavik Inuit Land Claims Agreement Act* S.C. 2008, c. 2, *Western Arctic (Inuvialuit) Claims Settlement Act*, S.C. 1984, c. 24, *Nunavut Land Claims Agreement Act* S.C. 1993, c. 29, *Labrador Inuit Land Claims Agreement Act* S.C. 2005, c. 27

The federal Inuit Nunangat Policy defines individuals as “Inuit” based on their enrollment with an Inuit Treaty Organization, based on the enrollment criteria negotiated and implemented between each Inuit Treaty Organization and the Crown. For Inuit in Canada, the concept of self-identification undermines the treaty relationship between the Crown and Inuit by ignoring the importance of the Inuit-Crown treaties and disregarding enrollment provisions, criteria and processes negotiated between Inuit and Canada.

For this reason, ITK welcomes the definition of a “Recognized Indigenous Collective” in the IVP which currently reads:

“Recognized Indigenous Collective: For the purposes of this policy, a “Recognized Indigenous Collective” in Canada is either 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 neighbour. Neighbours include those with whom Recognized Indigenous Collective has historical relationships, with particular attention being paid to relationship within the three Indigenous groups under Section 35. First Nations to First Nations relations; Inuit to Inuit relations; and Metis to Metis relations.”

The second criteria within the definition strikes a reasonable balance between those that have established rights through negotiation of treaties or court decisions, and those that are still in the process of negotiating their treaties. The Inuit experience in negotiating modern treaties resulted in some Inuit Treaty Organizations with concluded treaties and established rights while other regions were negotiating. Inuit worked in unity to support one another, to learn from one and to work together to advance our common issues for the benefit of all Inuit.

Whether Canada has recognized and affirmed rights, and whether rights are ‘established’ or ‘claimed’, Inuit Treaty Organizations have always known, worked with and supported other Inuit Treaty Organizations. For this reason, the second definition strikes a reasonable balance by requiring recognition from other indigenous peoples within the same or adjacent territory as well as other indigenous peoples from the same distinctions-based people (First Nation, Inuit or Metis).

Third Party requests for verification

ITK strongly recommends that Memorial consider revisions to its guidance on ‘Third Party requests for verification’. At the current time, practices related to indigenous identity verification are both novel and emerging. Various institutions use different criteria or processes for indigenous identity verification, and some use none at all.

Anyone using Memorial University resources, including affiliations to Memorial University, office space or infrastructure resources of Memorial University or other resources should adhere to Memorial University's policies related to indigenous identity verification. This includes situations where employees or students seek indigenous-focused opportunities from organizations external to Memorial University but requiring access to Memorial University resources.

Adopting such an approach would reduce any confusing situations where an individual may be identified as an 'indigenous' award winner for the purposes of an external award but would not be considered 'indigenous' consistent with the IVP.

At minimum, Memorial University should take measures to ensure that external actors are aware of the Memorial University IVP to provide an opportunity for other institutions to align with the IVP.

Further, Memorial University should consider allowing University employees or students to identify themselves to external actors, referencing the Memorial University IVP and to consider working with others to develop shared resources for indigenous identity verification. This could reduce the administrative burden on Memorial University, other actors and Inuit employees and students by reducing duplicative requests for identity or enrollment documents.

Inuit Involvement in Policy Application

Throughout the draft policy there is reference to the Verification Committee that is tasked with verifying the identity of Memorial staff, instructor, students or others who claim to be Indigenous and want to apply for opportunities throughout Memorial. ITK recognizes that policies evolve and that the Indigenous Verification Policy will be reviewed on a regular basis. Memorial should consult with Inuit on such reviews as they are designed, developed and implemented.

Appendix A:

Inuit Nunangat Policy

Cabinet Directive on the Implementation of the Inuit Nunangat Policy

NOTE TO APPLICANT: The attachment has been removed as it is already found above in the responsive records.

IAP Office

From: [REDACTED]
To: [Policy](#)
Subject: Sent on behalf of Inuit Tapiriit Kanatami: Memorial University of Newfoundland Draft Indigenous Verification Policy ("IVP")
Date: Friday, May 2, 2025 7:26:49 PM
Attachments: [20250502-Final Response to MUNs Draft IVP.doc](#)

Attached is ITK's response to MUNs Draft Indigenous Verification Policy.



From: [REDACTED]
To: [Policy](#)
Subject: Indigenous Verification Policy; Comments
Date: Friday, May 2, 2025 6:07:17 PM

Hello Policy Office;

Please accept the following feedback, related to the proposed Indigenous Verification policy. I've read through both the April 2024 report and the subsequent draft policy, and carefully reflected [REDACTED]

[REDACTED] this has raised concerns related to i) uncertainty in when this verification process would be initiated, and ii) unintended consequences.

The draft policy explicitly addresses Indigenous citizenship/membership, and is 'not about determining or verifying a person's identity'. I appreciate the distinction;

[REDACTED]
[REDACTED] It's unclear to me whether this new policy is intended only to influence [REDACTED] decisions, or if it would supersede all areas where (self-declared) identity was previously sufficient. I have relatively minor concerns if the former is true, but the latter could inadvertently impede the success of Indigenous members of the MUNL community.

[REDACTED]
[REDACTED] How long will verification take (from requesting documentation through to internal MUNL review)? I'm concerned that search committees may be dissuaded from considering Indigenous applicants in the interests of streamlining decisions; or that Indigenous scholars may be dissuaded from applying when faced with an extra layer of scrutiny relative to other groups.

I'll add that the criteria for defining a legitimate Indigenous collective are subject to change: while Section 35 status is likely robust, recognition by neighbouring collectives could be more changeable/less stable. Conflicts between any neighbouring 'collectives' (whether Indigenous or otherwise) are common; what happens if recognition changes as conflicts arise/resolve? It seems that Nunatukavut Community Council (previously recognized explicitly by MUNL policies) will not be recognized as an Indigenous collective under the new policy; putting aside any personal considerations of NCC's recognition, it's clear that this shift in MUNL's position is going to be extremely difficult to navigate. Is it possible that changes in inter-collective relationships will trigger similar shifts in verification status in the future? And, should an 'unrecognized' collective subsequently attain sufficient federal recognition, what are the implications for MUNL and MUNL policy?

I appreciate that a good deal of work has gone into this draft policy, and that a system for addressing fraudulent claims has become necessary. I'm hopeful that this draft policy will serve as useful starting point for such a system, even if I have reservations about the current formulation.

Many thanks,

A solid black rectangular box used to redact a signature.

From: [REDACTED]
To: [Policy](#)
Subject: Feedback re Indigenous Policy for Memorial University
Date: Friday, May 2, 2025 11:58:17 PM

I wish to respectfully submit some queries I have regarding the proposed policy for Memorial University.

[REDACTED] I am concerned. Such a short time frame for input concerning such a blanket policy that would affect a group of youth at our only University. If proven over time to be in error, there will be no opportunity for redress for the individuals affected. If there ever was a need for a "think tank", this is one for sure. Could not proof be looked at first and then formulate policy? The heavy handed approach seems colonial at best and with evidence of political lateral violence.

There is talk of trauma not suffered by Southern Labrador Inuit as was so in the North. This is not so. Poverty, residential schools, resettlement, TB and families broken up by being sent away to the Sanitarium, the Spanish Flu with huge numbers dead.... All these were experienced in Southern Labrador as well. Should this policy be built on erroneous thinking?

When is an Inuk not an Inuk? NG Membership disallows Southern Labrador Inuit based on geography using phrases such as "your ancestor is not a "Nunatsiavut Inuk". The Federal government is responsible for all Inuit in the long run. DNA tests through Ancestry .com have shown numerous individuals to have more than 25% Arctic Indigenous background after being rejected.

Decisions at Memorial will supposedly be based on Section 35 rights. To receive that final designation, a particular collective must complete a Land Claims process. It took NG thirty years to complete theirs in 2005. NunatuKavut has only been in negotiations 10-15 years to date. Signs point to future verification of identity. A court case in late 2024 was awarded to NunatuKavut. Would that have happened with no facts for verification behind it?

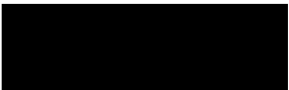
[REDACTED]

[REDACTED]

I have questions, Many more, I have concerns, but since this has arisen, I mostly feel sad.

I hope that time will be allowed for deeper evaluation.

Sincerely,



From: [REDACTED]
To: [Policy](#)
Subject: MUN verification policy
Date: Saturday, May 3, 2025 12:21:14 AM
Attachments: [MUN indigenous verification policy.docx](#)



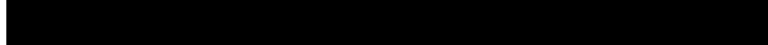
May 2nd, 2025

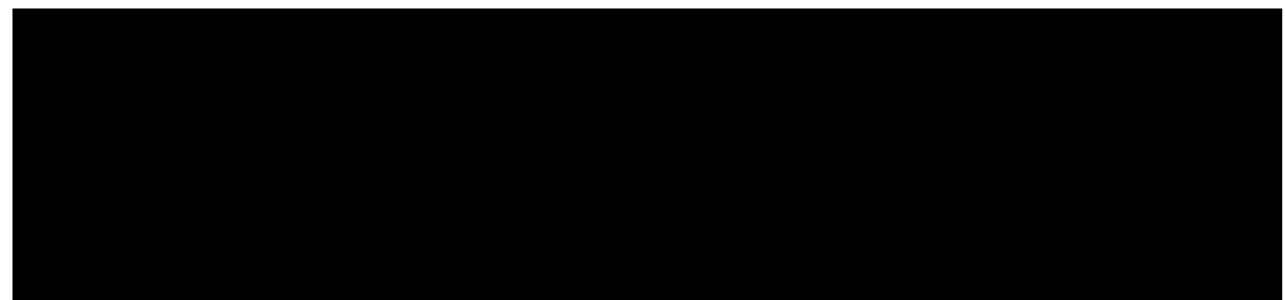
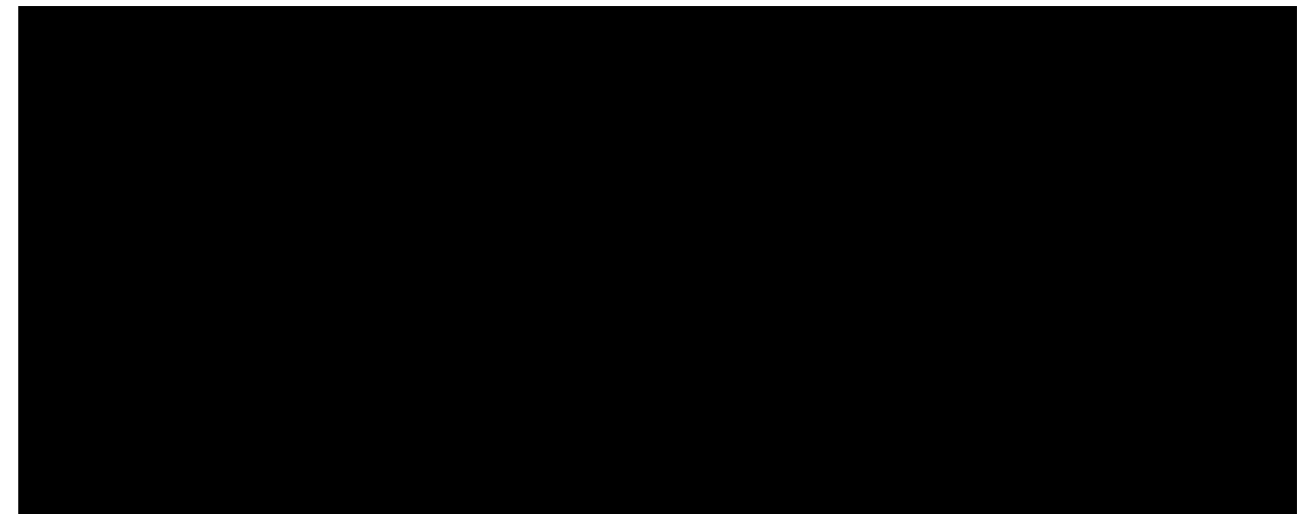
To Whom it may Conern,

 Good day

I write this letter in full support or MUN's Indigenous Verification Policy. 



 I feel this is very big positive step forward for all indigenous students, that actually have more obstacles to overcome then other students within the province.



[REDACTED]

To all indigenous people, the Verification Policy will turn the tide. [REDACTED]

[REDACTED]

[REDACTED] There could be 100 self identifiers who can be upset with this policy but I hope it takes one legitimate rights holding Indigenous person to outweigh those that are opposed to the policy. To quote the Innu nation "There is a difference between Rights-Bearing peoples and Rights-Seeking peoples, policies are needed to distinguish between the two. Making the distinction is important to ensuring that Rights-Bearing people are not having their rights or opportunities lessened by those who are seeking rights but do not have them... Rights seeking people are occupying space in discussions meant for Indigenous people".

[REDACTED]

From: [REDACTED]
To: [REDACTED]
Cc: [Policy](#)
Subject: Re: Indigenous Verification Policy
Date: Saturday, May 3, 2025 5:00:22 PM

Thank you! [REDACTED]

On Tue, Apr 29, 2025 at 7:51 AM [REDACTED] wrote:

Please see the attached letter.

Thank you,

[REDACTED]

From: [REDACTED]
To: [Policy](#)
Subject: Nunatukavut Representation
Date: Saturday, May 3, 2025 11:46:50 PM

Hi there,

Are you able to clarify your policy to include Nunatukavut Inuit people? [REDACTED]
[REDACTED] Details can be found at
standwithnukatukavut.ca.

Thank you,
[REDACTED]

From: [President, The](#)
To: [Policy](#)
Cc: [voindigenous](#)
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Monday, May 5, 2025 9:37:44 AM

Please see below.

I have acknowledged receipt on behalf of the President's Office and also advised I would be forwarding to policy@mun.ca.

Best regards,

Rose

Rose M. Frew, Executive Assistant to the President (Correspondence)

President's Office, Room A-2028

Arts and Administration Building | 230 Elizabeth Avenue

Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7

t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From:

Sent: Friday, May 2, 2025 4:44 PM

To: President, The <munpres@mun.ca>

Cc:

Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,

I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED]
[REDACTED] This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]
[REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial

University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
[REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

[REDACTED]

From: [President, The](#)
To: [Policy](#)
Cc: [vpindigenous](#)
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Monday, May 5, 2025 9:53:46 AM

Forwarding for your attention.
 I have acknowledged receipt on behalf of the President's Office.

Best regards,
 Rose
 Rose M. Frew, Executive Assistant to the President (Correspondence)
 President's Office, Room A-2028
 Arts and Administration Building | 230 Elizabeth Avenue
 Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7
 t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From: [REDACTED]
Sent: Friday, May 2, 2025 6:50 PM
To: President, The <munpres@mun.ca>
Cc: [REDACTED]
Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,
 I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED] This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
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3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
 [REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

From: [President, The](#)
To: [Policy](#)
Cc: [vpindigenous](#)
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Monday, May 5, 2025 9:57:38 AM

Please see below for your attention.
 I have acknowledged receipt on behalf of the President's Office.

Best regards,
 Rose
 Rose M. Frew, Executive Assistant to the President (Correspondence)
 President's Office, Room A-2028
 Arts and Administration Building | 230 Elizabeth Avenue
 Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7
 t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From: [REDACTED]
Sent: Friday, May 2, 2025 10:28 PM
To: President, The <munpres@mun.ca>
Cc: Russell, Lisa <lisar@mun.ca>; Scott, Tina (Regents) <tinas@mun.ca>
Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,
 I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED] This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
 [REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.



Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

Sincerely,



From: President, The
To: Policy
Cc: vpindigenous
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Monday, May 5, 2025 9:59:34 AM

Please see below.

I have acknowledged receipt.

Best regards,

Rose

Rose M. Frew, Executive Assistant to the President (Correspondence)

President's Office, Room A-2028

Arts and Administration Building | 230 Elizabeth Avenue

Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7

t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From [REDACTED]

Sent: Saturday, May 3, 2025 9:20 AM

To: President, The <munpres@mun.ca>

Cc: [REDACTED]

Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,

I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED]. This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]

[REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

Sent from my iPhone

From: [President, The](#)
To: [Policy](#)
Cc: [vpindigenous](#)
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Monday, May 5, 2025 10:00:57 AM

Please see below.
 I have acknowledged receipt.

Best regards,
 Rose
 Rose M. Frew, Executive Assistant to the President (Correspondence)
 President's Office, Room A-2028
 Arts and Administration Building | 230 Elizabeth Avenue
 Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7
 t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From: [REDACTED]
Sent: Saturday, May 3, 2025 9:35 AM
To: President, The <munpres@mun.ca>
Cc: [REDACTED]
Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,
 I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED] This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]
 [REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
 [REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

Sent from my iPhone

From: President, The
To: Policy
Cc: vpindigenous
Subject: FW: Memorial University's Discriminatory Indigenous Verification Policy
Date: Monday, May 5, 2025 10:02:28 AM

Please see below.
 I have acknowledged receipt.

Best regards,
 Rose
 Rose M. Frew, Executive Assistant to the President (Correspondence)
 President's Office, Room A-2028
 Arts and Administration Building | 230 Elizabeth Avenue
 Memorial University | St. John's | Newfoundland and Labrador | A1C 5S7
 t: 709.864.8212 | f: 709.864.2059 | email: president@mun.ca

We acknowledge that the lands on which Memorial University's campuses are situated are in the traditional territories of diverse Indigenous groups, and we acknowledge with respect the diverse histories and cultures of the Beothuk, Mi'kmaq, Innu, and Inuit of this province.

-----Original Message-----

From: [REDACTED]
Sent: Sunday, May 4, 2025 11:24 AM
To: President, The <munpres@mun.ca>
Cc: [REDACTED]
Subject: Memorial University's Discriminatory Indigenous Verification Policy

Dear President Lokash,
 I am writing to express my strong opposition to Memorial University's proposed Indigenous verification policy, which, as it stands, excludes the voices and rights of the NunatuKavut Inuit community.

[REDACTED]
 This policy, relying on colonial definitions and a flawed external report, is not only misleading but also harmful [REDACTED]
 [REDACTED]

The exclusionary nature of this policy undermines the principles of inclusion and reconciliation that Memorial University purports to uphold. It devalues Indigenous identity and perpetuates harm by excluding thousands of NunatuKavut Inuit from Indigenous spaces within the university.

I urge Memorial University to take the following actions:

1. Immediately withdraw the proposed policy in its current form.
2. Begin meaningful, respectful, and rights-based engagement with the NunatuKavut Community Council (NCC) and other impacted Indigenous organizations in the province.
3. Introduce a policy based on recognition of rights, respect, and shared priorities, one that reflects Memorial University's commitment to true reconciliation.

As it stands, this policy does not reflect the values of Memorial University or the spirit of reconciliation [REDACTED]
 [REDACTED] I stand in solidarity with the NunatuKavut Inuit students, staff, faculty, and alumni and call for Memorial University to immediately correct this injustice.

Thank you for your attention to this urgent matter. I look forward to your prompt action in ensuring that Memorial University is a space that truly welcomes all Indigenous peoples.

