



PRIVACY ACT
ANNUAL REPORT 2023-2024

Prepared as of March 31, 2024

College of Immigration and Citizenship Consultants
Collège des consultants en immigration et en citoyenneté

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COLLEGE'S NARRATIVE REPORT FOR 2023-2024

INTRODUCTION

The purpose of the *Privacy Act* (the Act) is to protect the privacy of individuals with respect to personal information about themselves held by a government institution and to provide individuals with a right of access to that information.

This annual report, covering the reporting year from April 1, 2023, to March 31, 2024, is prepared by the College of Immigration and Citizenship Consultants (the College) for tabling in Parliament in accordance with section 72 of the Act.

The College is the authority mandated by the Government of Canada to regulate the practice of Regulated Canadian Immigration Consultants (RCICs) and Regulated International Student Immigration Advisors (RISIAs). Its role, authority and powers are established in the *College of Immigration and Citizenship Consultants Act* (Canada). The College sets and enforces the licensing, education, and ethical standards of the profession.

The College regulates immigration and citizenship consultants in the public interest and protects the public by:

- Establishing and administering qualification standards, standards of practice, and continuing education requirements for licensees;
- Establishing and providing training and development programs for licensees;
- Ensuring compliance with the Code of Professional Conduct; and
- Undertaking public awareness activities.

Governance

The College's mandate is to regulate immigration and citizenship consultants in the public interest and protect the public. This federal mandate stems from:

- The *College of Immigration and Citizenship Consultants Act* (College Act)
- The *Immigration and Refugee Protection Act* (IRPA)
- The Immigration and Refugee Protection Regulations
- The *Citizenship Act*

The College Act, among other things:

- Creates a licensing regime for immigration and citizenship consultants;
- Requires that licensees comply with the Code of Professional Conduct;
- Authorizes the College's Complaints Committee to conduct investigations into a licensee's conduct and activities;
- Authorizes the College's Discipline Committee to take or require action if it determines that a licensee has committed professional misconduct or was incompetent;
- Prohibits non-licensees from using certain titles and representing themselves to be licensees;
- Empowers the College to seek an injunction to prevent unauthorized practitioners from contravening those prohibitions;
- Gives the responsible Minister the authority to determine the number of directors on the Board of Directors;

- Requires the Board to do anything that is advisable to carry out the purposes of the College Act; and
- Contains transitional provisions allowing the Immigration Consultants of Canada Regulatory Council to be continued as the College.

The College Act lays out the terms for the Board of Directors. A Leadership Team leads the College. The College did not have any non-operational (“paper”) subsidiaries during this reporting period.

ORGANIZATIONAL STRUCTURE

The College remains a relatively small organization consisting of a Board of Directors and fewer than 150 full-time employees. The College does not have a formalized Access to Information and Privacy (ATIP) office, but rather, the Chief Operating Officer, together with the support of the Associate Director, Operations and the Policy Compliance Specialist, assumes the responsibilities of an ATIP Coordinator.

The College works with a privacy consulting firm to support the development of the College’s Privacy Management Program (PMP) and to lead the College’s Privacy Impact Assessments (PIAs).

The College did not enter into any service agreements under section 73.1 of the Act.

DELEGATION ORDER

The Delegation Order dated January 19, 2023, designates the Chief Operating Officer to exercise certain powers and perform certain duties and functions of the President & Chief Executive Officer under the Act and is attached hereto and forms part of this annual report (Appendix A).

PERFORMANCE 2023-2024: STATISTICAL REPORT AND INTERPRETATION

The College’s statistical report for 2023-2024 is attached hereto and forms part of this annual report (Appendix B). During the period of this report, the College received 26 personal information requests under the provisions of the Act.

The chart below illustrates the number of requests the College has received since it became subject to the Act (November 23, 2021).

Reporting Year	2021-2022	2022-2023	2023-2024
# of personal information requests	0	0	26

The number of requests received by the College is inflated by individuals seeking information from Immigration, Refugees and Citizenship Canada (IRCC). Of the 26 requests, 21 were sent to the College in error, due to confusion between the two organizations as both contain the words “immigration” and “citizenship”.

The College completed 100% of requests within legislative timelines, and there were no active requests remaining as of the last day of the reporting period. The following chart illustrates the disposition of the requests and their completion times.

Disposition of requests	Completion time		
	1 to 15 days	16 to 30 days	31 to 60 days
Disclosed in part		1	1
No records exist	22		
Requests abandoned		2	

The College required an extension of 30 days for one of its requests due to the high volume of pages that required review. Meeting the original time limit would have unreasonably interfered with the College’s operations and necessary consultations could not reasonably be completed within the original time limit. The College did not receive any consultation requests from another institution during the reporting period.

TRAINING AND AWARENESS

During the reporting period, the College’s Policy Compliance Specialist attended various informative training sessions (InfoBlitz, Deep Dive Series, etc.) delivered by the Treasury Board of Canada Secretariat (TBS). The Policy Compliance Specialist also received over 20 hours of one-on-one ATIP and privacy instruction from senior trainers at Immigration, Refugees, and Citizenship Canada (IRCC). Select College staff were invited to participate in ATIP training sessions that IRCC regularly delivers to its own staff. Session topics included: ATIP 101 — Appropriate Use and Access of Personal Information; Protect, Secure and Manage Information; and Understanding and Managing ATIP Requests.

During the reporting period, the College developed its own privacy training module and plans to deliver this mandatory training to all existing staff. The training will form part of the new employee onboarding process.

POLICIES, GUIDELINES AND PROCEDURES

The College has made significant progress in the development of its PMP. It has revised its internal privacy policy, which is applicable to anyone employed by the College. The College’s website contains two new [privacy statements](#) and four new [privacy notices](#), which have been posted in areas where personal information is collected. The College has also added the following procedures to its PMP library: PIA Management procedure, Privacy Breach Protocol, and Privacy Complaints Handling procedure.

INITIATIVES AND PROJECTS TO IMPROVE PRIVACY

The College has initiated two large-scale, multi-year projects that have a direct impact on privacy and the protection of personal information under the control of the College. Due to the scope of these projects, they are not expected to be completed in this reporting period. They are as follows:

1. A records management project, which will enable the College to define its classes of records and personal information banks, as well as determine appropriate record retention schedules and policies.

2. An Enterprise Risk Management project, which will impact how the College identifies and manages risks, including its privacy risks.

The College is also exploring leveraging its Enterprise Management System to automate the processing of ATIP requests.

SUMMARY OF KEY ISSUES AND ACTIONS TAKEN ON COMPLAINTS

There were no complaints of relevance to the Act received or concluded by the College during the reporting period.

MATERIAL PRIVACY BREACHES

No material privacy breaches occurred during the reporting period.

PRIVACY IMPACT ASSESSMENTS (PIAs)

The College did not complete any privacy impact assessments during the reporting period.

PUBLIC INTEREST DISCLOSURES

There were no disclosures made under paragraph 8(2)(m) of the Act during the reporting period.

MONITORING COMPLIANCE

Processing Time

The College utilizes an internal tracking log for personal information requests. The log reflects key dates and activities for all requests, including deadlines. The Policy Compliance Specialist updates and monitors the tracking log regularly. When requests are received, automated calendar reminders are created to assist with the timely completion of tasks. The Policy Compliance Specialist provides updates to the Associate Director, Operations and to the Chief Operating Officer throughout the lifecycle of a request.

Inter-institutional Consultations

The College did not consult with other institutions during this reporting period.

Frequently Requested Information

As mentioned earlier in this annual report, the College frequently receives requests that are intended for another government institution. In actuality, the College did not receive a high volume of personal information requests, but it will continue to monitor the types of requests it receives. If it is determined that certain information is frequently requested, the College will

assess the feasibility of making that information available by other means without compromising the privacy of individuals.

Appropriate Privacy Protections

The College has a formal process for reviewing contracts/agreements with service providers that handle personal information. Not only does the College review contracts to assess appropriateness of the privacy provisions, but it also reviews the service providers' privacy policies, terms of service, and other relevant information on their website, to better understand their privacy practices. The Policy Compliance Specialist conducts the privacy review and the Chief Operating Officer, and/or the Associate Director, Operations make their final recommendations.

APPENDIX A

COLLEGE'S *PRIVACY ACT* DELEGATION ORDER

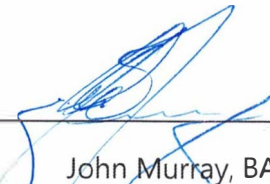
Access to Information Act and Privacy Act Delegation Order

The President & Chief Executive Officer of the College of Immigration and Citizenship Consultants (CICC), pursuant to section 95(1) of the *Access to Information Act* and section 73(1) of the *Privacy Act*, hereby designates the persons holding the positions set out in the schedule hereto, or the persons occupying on an acting basis those positions, to exercise the powers, duties and functions of the President & CEO as the head of the CICC, under the provisions of the Act and related regulations set out in the schedule opposite each position. This designation replaces all previous delegation orders.

Schedule

Position	<i>Access to Information Act</i> and Regulations	<i>Privacy Act</i> and Regulations
Chief Operating Officer (COO)	Full authority	Full authority

Dated, at the Town of Oakville, this 19th day of January, 2023



 John Murray, BA, LLB, LLM

 Chief Executive Officer, College of Immigration and Citizenship Consultants

APPENDIX B
COLLEGE'S STATISTICAL REPORT ON THE
***PRIVACY ACT* FOR 2023-2024**



Statistical Report on the *Privacy Act*

Name of institution: College of Immigration and Citizenship Consultants

Reporting period: 2023-04-01 to 2024-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		26
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		26
Closed during reporting period		26
Carried over to next reporting period		0
• Carried over within legislated timeline	0	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	24
E-mail	1
Mail	1
In person	0
Phone	0
Fax	0
Total	26

Section 2: Informal requests

2.1 Number of informal requests

		Number of Requests
Received during reporting period		0
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		0
Closed during reporting period		0
Carried over to next reporting period		0

2.2 Channels of informal requests

Source	Number of Requests
Online	0
E-mail	0
Mail	0
In person	0
Phone	0
Fax	0
Total	0

2.3 Completion time of informal requests

Completion Time							
0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
0	0	0	0	0	0	0	0

2.4 Pages released informally

Less Than 100 Pages Released		100-500 Pages Released		501-1000 Pages Released		1001-5000 Pages Released		More Than 5000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
0	0	0	0	0	0	0	0	0	0

Section 3: Requests Closed During the Reporting Period

3.1 Disposition and completion time

Disposition of Requests	Completion Time							
	0 to 15 Days	16 to 30 Days	31 to 60 Days	61 to 120 Days	121 to 180 Days	181 to 365 Days	More Than 365 Days	Total
All disclosed	0	0	0	0	0	0	0	0
Disclosed in part	0	1	1	0	0	0	0	2
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	22	0	0	0	0	0	0	22
Request abandoned	0	2	0	0	0	0	0	2
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	22	3	1	0	0	0	0	26

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	1	23(a)	1
19(1)(a)	0	22(1)(a)(ii)	0	23(b)	0
19(1)(b)	0	22(1)(a)(iii)	0	24(a)	0
19(1)(c)	0	22(1)(b)	0	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	2
19(1)(f)	0	22.1	0	27	1
20	0	22.2	0	27.1	0
21	0	22.3	0	28	0
		22.4	0		

3.3 Exclusions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
69(1)(a)	0	70(1)	0	70(1)(d)	0
69(1)(b)	0	70(1)(a)	0	70(1)(e)	0
69.1	0	70(1)(b)	0	70(1)(f)	0
		70(1)(c)	0	70.1	0

3.4 Format of information released

Paper	Electronic				Other
	E-record	Data set	Video	Audio	
0	2	0	0	0	0

3.5 Complexity

3.5.1 Relevant pages processed and disclosed for paper, e-record and dataset formats

Number of Pages Processed	Number of Pages Disclosed	Number of Requests
2929	1962	4

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
230	0	1

3.5.6 Relevant minutes processed per request disposition for video formats by size of requests

Disposition	Less than 60 Minutes processed		60-120 Minutes processed		More than 120 Minutes processed	
	Number of requests	Minutes Processed	Number of requests	Minutes Processed	Number of requests	Minutes Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	0	0	0	0	1	230
All exempted	0	0	0	0	0	0
All excluded	0	0	0	0	0	0
Request abandoned	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0
Total	0	0	0	0	1	230

3.5.7 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	2	0	0	2
All exempted	0	0	0	0	0
All excluded	0	0	0	0	0
Request abandoned	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0
Total	0	2	0	0	2

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	26
Percentage of requests closed within legislated timelines (%)	100

3.7 Deemed refusals

3.7.1 Reasons for not meeting legislated timelines

Number of requests closed past the legislated timelines	Principal Reason			
	Interference with operations / Workload	External Consultation	Internal Consultation	Other
0	0	0	0	0

3.7.2 Request closed beyond legislated timelines (including any extension taken)

Number of days past legislated timelines	Number of requests past legislated timeline where no extension was taken	Number of requests past legislated timeline where an extension was taken	Total
1 to 15 days	0	0	0
16 to 30 days	0	0	0
31 to 60 days	0	0	0
61 to 120 days	0	0	0
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	0	0

3.8 Requests for translation

Translation Requests	Accepted	Refused	Total
English to French	0	0	0
French to English	0	0	0
Total	0	0	0

Section 4: Disclosures Under Subsections 8(2) and 8(5)

Paragraph 8(2)(e)	Paragraph 8(2)(m)	Subsection 8(5)	Total
0	0	0	0

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 100 Pages Processed		100–500 Pages Processed		501-1000 Pages Processed		1001-5000 Pages Processed		More than 5000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0	0	0	0	0
More than 365	0	0	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0	0	0

Section 9: Complaints and Investigations Notices Received

Section 31	Section 33	Section 35	Court action	Total
0	0	0	0	0

Section 10: Privacy Impact Assessments (PIAs) and Personal Information Banks (PIBs)

10.1 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0

10.2 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	0	0	0
Central	0	0	0	0
Total	0	0	0	0

Section 11: Privacy Breaches

11.1 Material Privacy Breaches reported

Number of material privacy breaches reported to TBS	0
Number of material privacy breaches reported to OPC	0

11.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	0
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Section 12: Resources Related to the Privacy Act

12.1 Allocated Costs

Expenditures		Amount
Salaries		\$43,125
Overtime		\$0
Goods and Services		\$79,421
• Professional services contracts	\$79,421	
• Other	\$0	
Total		\$122,546

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.500
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.500
Students	0.000
Total	1.000

Note: Enter values to three decimal places.

APPENDIX C
2023-2024 SUPPLEMENTAL STATISTICAL
REPORT ON THE *ACCESS TO INFORMATION*
ACT AND THE PRIVACY ACT



Supplemental Statistical Report on the *Access to Information Act* and the *Privacy Act*

Name of institution: College of Immigration and Citizenship Consultants

Reporting period: 2023-04-01 to 2024-03-31

Section 1: Open Requests and Complaints Under the *Access to Information Act*

1.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	0	0	0

1.2 Enter the number of open complaints with the Information Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	1
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	1

Section 2: Open Requests and Complaints Under the *Privacy Act*

2.1 Enter the number of open requests that are outstanding from previous reporting periods.

Fiscal Year Open Requests Were Received	Open Requests that are <i>Within</i> Legislated Timelines as of March 31, 2024	Open Requests that are <i>Beyond</i> Legislated Timelines as of March 31, 2024	Total
Received in 2023-24	0	0	0
Received in 2022-23	0	0	0
Received in 2021-22	0	0	0
Received in 2020-21	0	0	0
Received in 2019-20	0	0	0
Received in 2018-19	0	0	0
Received in 2017-18	0	0	0
Received in 2016-17	0	0	0
Received in 2015-16	0	0	0
Received in 2014-15 or earlier	0	0	0
Total	0	0	0

2.2 Enter the number of open complaints with the Privacy Commissioner of Canada that are outstanding from previous reporting periods.

Fiscal Year Open Complaints Were Received by Institution	Number of Open Complaints
Received in 2023-24	0
Received in 2022-23	0
Received in 2021-22	0
Received in 2020-21	0
Received in 2019-20	0
Received in 2018-19	0
Received in 2017-18	0
Received in 2016-17	0
Received in 2015-16	0
Received in 2014-15 or earlier	0
Total	0

Section 3: Social Insurance Number

Has your institution begun a new collection or a new consistent use of the SIN in 2023-24?	No
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Section 4: Universal Access under the Privacy Act

How many requests were received from foreign nationals outside of Canada in 2023-24?	13
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Canada