



Privacy Act

Annual Report 2024-2025

Prepared as of August 22, 2025

College of Immigration and Citizenship Consultants
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College's Narrative Report For 2024-2025

Introduction

The purpose of the *Privacy Act* (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 period from April 1, 2024, to March 31, 2025, is prepared and submitted by the College of Immigration and Citizenship Consultants (College) for tabling in Parliament in accordance with section 72 of the *Privacy Act*.

About the College

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, in the public interest. It operates independently and is not publicly funded; its revenues are derived from fees paid by licensees, applicants, and candidates.

Vision

Every person who seeks Canadian immigration and citizenship advice has informed choice and access to a College licensee who consistently offers professional services.

Purpose

To regulate immigration and citizenship consultants in the public interest and protect the public, including 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

Values

- **Transparency** - Share decisions, policies, procedures and disciplinary outcomes with licensees and the public.
- **Integrity** - Maintain the highest moral and ethical standards.
- **Accountability** - Ensure that the Board of Directors, management and staff take full responsibility for actions and decisions.
- **Excellence** - Achieve excellence in all endeavours.
- **Fairness** - Ensure that policies, practices, procedures and decisions are justified and well understood.
- **Communication** - Welcome licensees, stakeholders and the public to contact the College on any matter relating to the regulation of the Canadian immigration and citizenship consulting profession.



Governance

The College's 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 creates a new self-regulatory regime that governs immigration and citizenship consultants. It also:

- 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.

The College is governed by a Board of Directors as defined by the College Act, and its operations are led by a dedicated Leadership Team.

Organizational Structure

The College operates as a relatively small organization, comprising a Board of Directors and fewer than 150 full-time employees. While it does not maintain a dedicated Access to Information and Privacy (ATIP) office, the responsibilities of the ATIP Coordinator are collectively managed by the Chief Operating Officer, with support from the Associate Director, Operations, the Policy Compliance Specialist, and the Compliance Coordinator.

The College was not a party to any service agreements under section 73.1 of the *Privacy 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 2024-2025: Statistical Report and Interpretation

The College's statistical report for 2024-2025 is attached hereto and forms part of this annual report (Appendix B). During the period of this report, the College received fourteen (14) personal information requests under the provisions of the *Privacy Act*. Of these fourteen (14) requests, 100% were closed within legislative timelines and no requests are being carried over to the next reporting period.

All requests, except for one received by email, were submitted online through the ATIP Online Request Service (AORS) portal.



The following chart outlines the completion time and disposition of the requests received during this reporting period:

Disposition of requests	Completion Time			
	0 to 15 days	16 to 30 days	31 to 60 days	61 to 120 days
All disclosed		2		
Disclosed in part		1	2	1
No records exist	7			
Request abandoned		1		
Total	7	4	2	1

The College took three (3) extensions under section 15(a)(i) of the Act as internal resource constraints related to staff workload and the extensive effort required to collect and review a substantial volume of documentation was required. These measures were necessary to ensure that regular business operations remained unaffected.

Consistent with the previous reporting period, a significant portion of requesters continue to erroneously direct their inquiries to the College, instead of Immigration, Refugees and Citizenship Canada. As a result, 50% of the requests received did not yield any records.

Of the completed requests, 14% resulted in full disclosure of records, while 29% were partially disclosed. Additionally, the College did not receive any requests for consultation during the reporting period.

The College received one complaint during the 2023-2024 reporting period. Pursuant to Section 35 of the *Privacy Act*, the Office of the Privacy Commissioner determined the complaint to be well-founded and resolved.

Training and Awareness

During the reporting period, the College continued to enhance its mandatory privacy training, ensuring effective delivery to both existing and new staff.

Additionally, informal privacy consultations remained ongoing, supporting a strong privacy culture across all College activities.

Policies, Guidelines and Procedures

The College has revised its Requester Identity Verification Procedure in response to a resolved complaint under the *Access to Information Act*. The updated procedure now extends to personal information requests under the *Privacy Act*. No additional policies, guidelines or procedures were implemented during the current reporting period.

Initiatives and Projects to Improve Privacy

The College does not utilize specialized ATIP software to process requests under the Act. Instead, it employs a carefully designed manual tracking system. To enhance efficiency and oversight, a detailed request task tracker was developed to document and monitor each step in the request-handling process.



The College has made significant strides in its records management project, working toward a more structured and compliant approach to information governance. As part of this initiative, the College is refining records retention and disposition schedules and policies to ensure consistency, efficiency, and alignment with regulatory requirements. The goal is to finalize and implement these frameworks by the end of the current reporting period, reinforcing best practices in data management and security.

Summary of Key Issues and Actions Taken on Complaints

During this reporting period, the College engaged in a collaborative effort with the Office of the Privacy Commissioner (OPC) to resolve a right of access complaint filed under the *Privacy Act*. Guided by the OPC's recommendations, the College applied the relevant exemptions under the Act and ensured that the access format provided was fully compliant with regulatory requirements. As a result, the OPC issued a Section 35 cessation of investigation notice, determining the complaint to be well-founded and resolved.

Material Privacy Breaches

During the reporting period, there were no material privacy breaches that occurred.

Privacy Impact Assessments

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 *Privacy Act* during the reporting period.

Monitoring Compliance

Processing Time

The College employs an internal tracking log to monitor the processing timelines for access to information requests. This log is regularly updated and captures key milestones, including submission dates, activities undertaken, deadlines and completion status for each request. Oversight of all ATIP requests is managed by the Policy Compliance Specialist, who provides ongoing updates to the Associate Director, Operations and the Chief Operating Officer (COO), throughout the lifecycle of a request. Additionally, the COO receives quarterly reports summarizing the volume and types of requests received, their processing times, and final dispositions.

Appropriate Privacy Protections

The College has a structured process for evaluating contracts and agreements with service providers that manage personal information. This process includes a comprehensive review of contractual privacy provisions to ensure their adequacy, as well as an assessment of the service providers' privacy policies, terms of service, and other relevant publicly available information to gain a deeper understanding of their privacy practices. The privacy review is conducted by the Policy Compliance Specialist, with final recommendations made by the Chief Operating Officer and/or the Associate Director, Operations.



Appendix A
College's *Privacy Act* Delegation Order

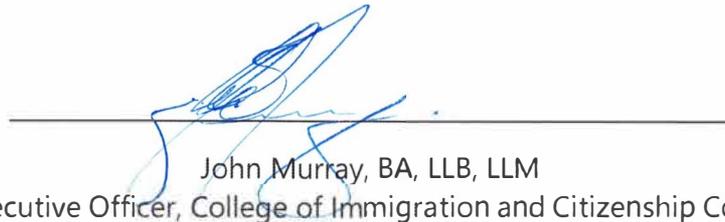
Access to Information Act and Privacy Act Delegation Order

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 2024-2025



Statistical Report on the *Privacy Act*

Name of institution: College of Immigration and Citizenship Consultants

Reporting period: 2024-04-01 to 2025-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		14
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		14
Closed during reporting period		14
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	13
E-mail	1
Mail	0
In person	0
Phone	0
Fax	0
Total	14

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	2	0	0	0	0	0	2
Disclosed in part	0	1	2	1	0	0	0	4
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	7	0	0	0	0	0	0	7
Request abandoned	0	1	0	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	7	4	2	1	0	0	0	14

3.2 Exemptions

Section	Number of Requests	Section	Number of Requests	Section	Number of Requests
18(2)	0	22(1)(a)(i)	0	23(a)	0
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)	2	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	3
19(1)(f)	0	22.1	0	27	0
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	6	0	0	1	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
1573	967	7

3.5.2 Relevant pages processed per request disposition for paper, e-record and dataset formats by size of requests

Disposition	Less 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 Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	2	21	0	0	0	0	0	0	0	0
Disclosed in part	1	24	2	684	1	844	0	0	0	0
All exempted	0	0	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0	0	0
Request abandoned	1	0	0	0	0	0	0	0	0	0
Neither confirmed nor denied	0	0	0	0	0	0	0	0	0	0
Total	4	45	2	684	1	844	0	0	0	0

3.5.3 Relevant minutes processed and disclosed for audio formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
13	13	1

3.5.4 Relevant minutes processed per request disposition for audio 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	1	13	0	0	0	0
Disclosed in part	0	0	0	0	0	0
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	1	13	0	0	0	0

3.5.5 Relevant minutes processed and disclosed for video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
0	0	0

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	0	0
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	0	0

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	3	0	0	3
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	3	0	0	3

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	14
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	1	0	1

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		\$45,000
Overtime		\$0
Goods and Services		\$39,478
• Professional services contracts	\$39,478	
• Other	\$0	
Total		\$84,478

12.2 Human Resources

Resources	Person Years Dedicated to Privacy Activities
Full-time employees	0.300
Part-time and casual employees	0.000
Regional staff	0.000
Consultants and agency personnel	0.200
Students	0.000
Total	0.500

Note: Enter values to three decimal places.



Appendix C
**2024-2025 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: 2024-04-01 to 2025-03-31

Section 1: Requests Carried Over and Active Complaints Under the *Access to Information Act*

1.1 Requests carried over to next reporting period, broken down by reporting period received

Reporting Period Requests Carried Over Were Received	Requests Carried Over that are <i>Within</i> Legislated Timelines as of March 31, 2025	Requests Carried Over that are <i>Beyond</i> Legislated Timelines as of March 31, 2025	Total
Received in 2024-25	0	0	0
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 or earlier	0	0	0
Total	0	0	0

1.2 Active complaints with the Information Commissioner of Canada, broken down by reporting period received

Reporting Period Active Complaints Were Received by Institution	Number of Active Complaints
Received in 2024-25	0
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 or earlier	0
Total	0

Section 2: Requests Carried Over and Active Complaints Under the *Privacy Act*

2.1 Requests carried over to the next reporting period, broken down by reporting period received

Reporting Period Requests Carried Over Were Received	Requests Carried Over that are <i>Within</i> Legislated Timelines as of March 31, 2025	Requests Carried Over that are <i>Beyond</i> Legislated Timelines as of March 31, 2025	Total
Received in 2024-25	0	0	0
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 or earlier	0	0	0
Total	0	0	0

2.2 Active complaints with the Privacy Commissioner of Canada, broken down by reporting period received

Reporting Period Active Complaints Were Received by Institution	Number of Active Complaints
Received in 2024-25	0
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 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 2024-25?	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 2024-25?	9
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Canada