



Privacy Act

Annual Report 2025-2026

Prepared as of August 24, 2026

College of Immigration and Citizenship Consultants
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College's Narrative Report For 2025-2026

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 period from April 1, 2025, to March 31, 2026, is prepared and submitted by the College of Immigration and Citizenship Consultants (the 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; and

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.

The College did not have any wholly owned subsidiaries during this reporting period.

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 Interim President & Chief Executive Officer, with support from the Interim 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 February 26, 2026, designates the Interim Director, Operations, to exercise certain powers and perform duties and functions of the Interim President & Chief Executive Officer under the Act and is attached hereto and forms part of this annual report (Appendix A).

Performance 2025-2026: Statistical Report and Interpretation

The College's statistical report for 2025-2026 is attached hereto and forms part of this annual report (Appendix B). During the period of this report, the College received thirteen (13) personal information requests under the provisions of the *Privacy Act*. Of these requests, 91% were closed within legislative timelines and two (2)



requests are being carried over to the next reporting period. These requests were received during the 2025-2026 reporting period and are both within the prescribed legislative timeframe for completion.

Over a three-year period, the number of personal information requests received by the College remained relatively stable. While 26 requests were recorded in 2023-2024, 21 of the 26 requests received were submitted to the College in error and were intended for a different organization.

	2023-2024	2024-2025	2025-2026
Number of requests received	26	14	13

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				
Disclosed in part		2	4	1
No records exist	3			
Request abandoned		1		
Total	3	3	4	1

The percentage of completed requests for which records were “disclosed in part” is 64%.

The College received one (1) consultation request from an organization outside the Government of Canada which was completed in 14 days.

During the reporting period, the College took five (5) extensions under paragraph 15(a)(i) of the Act. These extensions were required due to the substantial volume of records involved, the complexity of the requests, and limited internal resources available to support request processing. In the absence of a dedicated ATIP office, responding to increasingly complex requests necessitates significant staff involvement across business areas. The extensions were taken to ensure thorough and accurate processing of requests while maintaining the continuity of regular business operations.

The College did not receive any complaints from the Office of the Privacy Commissioner during the 2025-2026 reporting period.

Training and Awareness

During the reporting period, individualized onboarding and knowledge-transfer sessions were provided to a newly appointed Compliance Coordinator who has functional responsibility for the administration of the *Privacy Act*. These sessions covered the rights of individuals under the Act, the processing of personal information requests, the protection and safeguarding of personal information and privacy breach identification.

Additionally, the Policy Compliance Specialist and the Compliance Coordinator attended numerous privacy-related training sessions and community meetings hosted by the Information and Privacy Policy Division of the Treasury Board of Canada Secretariat. These sessions provided updates on legislative and policy requirements, best practices in privacy administration, and emerging privacy issues across the federal ATIP community.



During the reporting period, privacy training materials were developed and finalized to support mandatory employee training, strengthen privacy awareness and compliance.

Policies, Guidelines and Procedures

During the reporting period, the College implemented an internal Privacy Policy to support compliance with the *Privacy Act* and establish clear requirements for the collection, use, disclosure, retention, and safeguarding of personal information across the organization.

The College has a structured process for evaluating contracts and agreements with service providers that collect, use, disclose, store, or otherwise manage personal information on its behalf. This process includes a review of contractual privacy provisions to ensure that appropriate safeguards are in place to protect personal information.

As part of this process, the College also assesses service providers' privacy policies, terms of service, and other relevant publicly available information to gain a deeper understanding of their privacy practices and risk profile. Privacy reviews are conducted by the Policy Compliance Specialist, with final recommendations made by the Interim Director, Operations.

Where appropriate, the College works with service providers to address identified privacy risks and strengthen privacy protections before entering into an agreement.

Initiatives and Projects to Improve Privacy

In the 2025-2026 reporting period, the College implemented an online ticketing system for internal privacy-related inquiries, replacing the previous email-based intake process. The new system was introduced to enhance the tracking, management, and resolution of inquiries received from employees regarding privacy matters.

The implementation of the ticketing system has improved the College's ability to streamline internal workflows, enhance response efficiency, and provide greater visibility into recurring themes and trends. This supports the identification of common privacy concerns and opportunities for targeted awareness and training initiatives.

Summary of Key Issues and Actions Taken on Complaints

No complaints were received or concluded by the College during the reporting period.

Material Privacy Breaches

During the reporting period, there were no material privacy breaches reported to the Office of the Privacy Commissioner and to Treasury Board of Canada Secretariat (Privacy and Responsible Data Division).

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

The College uses 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, actions taken, deadlines



and the status of each request. Oversight of all ATIP requests is the responsibility of the Policy Compliance Specialist, who provides regular updates to the Interim Director, Operations. Information on ATIP activities is also reported monthly to the Interim President & CEO, and quarterly to the Board of Directors.



Appendix A

College's *Privacy Act* Delegation Order

Access to Information Act and Privacy Act Delegation Order

The Interim President and Chief Executive Officer (CEO) 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 Interim President and 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 and Regulations</i>	<i>Privacy Act and Regulations</i>
Interim Director, Operations	Full authority	Full authority

Dated, at the City of Burlington, this 26th day of February 2026



Kate Lamb
Interim President and CEO, College of Immigration and Citizenship Consultants



Appendix B

College's Statistical Report on the *Privacy Act* for 2025-2026

Statistical Report on the *Privacy Act*

Name of institution: College of Immigration and Citizenship Consultants

Reporting period: 2025-04-01 to 2026-03-31

Section 1: Requests Under the *Privacy Act*

1.1 Number of requests received

		Number of Requests
Received during reporting period		13
Outstanding from previous reporting periods		0
• Outstanding from previous reporting period	0	
• Outstanding from more than one reporting period	0	
Total		13
Closed during reporting period		11
Carried over to next reporting period		2
• Carried over within legislated timeline	2	
• Carried over beyond legislated timeline	0	

1.2 Channels of requests

Source	Number of Requests
Online	5
E-mail	8
Mail	0
In person	0
Phone	0
Fax	0
Total	13

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 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

2.3 Pages released informally

Less Than 500 Pages Released		500-10000 Pages Released		More Than 10000 Pages Released	
Number of Requests	Pages Released	Number of Requests	Pages Released	Number of Requests	Pages Released
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	2	4	1	0	0	0	7
All exempted	0	0	0	0	0	0	0	0
All excluded	0	0	0	0	0	0	0	0
No records exist	3	0	0	0	0	0	0	3
Request abandoned	0	1	0	0	0	0	0	1
Neither confirmed nor denied	0	0	0	0	0	0	0	0
Total	3	3	4	1	0	0	0	11

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)	6	24(b)	0
19(1)(d)	0	22(1)(c)	0	25	0
19(1)(e)	0	22(2)	0	26	5
19(1)(f)	0	22.1	0	27	2
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	7	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
5212	2589	7

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

Disposition	Less Than 500 Pages Processed		500-10000 Pages Processed		More Than 10000 Pages Processed	
	Number of Requests	Pages Processed	Number of Requests	Pages Processed	Number of Requests	Pages Processed
All disclosed	0	0	0	0	0	0
Disclosed in part	1	2	6	5210	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	2	6	5210	0	0

3.5.3 Relevant minutes processed and disclosed for audio and video formats

Number of Minutes Processed	Number of Minutes Disclosed	Number of Requests
19	19	2

3.5.4 Relevant minutes processed per request disposition for audio and video formats ~~by size of requests~~

Disposition	Number of requests	Minutes Processed
All disclosed	0	0
Disclosed in part	2	19
All exempted	0	0
All excluded	0	0
Request abandoned	0	0
Neither confirmed nor denied	0	0
Total	2	19

3.5.5 Other complexities

Disposition	Consultation Required	Legal Advice Sought	Interwoven Information	Other	Total
All disclosed	0	0	0	0	0
Disclosed in part	0	7	0	0	7
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	7	0	0	7

3.6 Closed requests

3.6.1 Number of requests closed within legislated timelines

Number of requests closed within legislated timelines	10
Percentage of requests closed within legislated timelines (%)	90.90909091

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
1	1	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	1	1
121 to 180 days	0	0	0
181 to 365 days	0	0	0
More than 365 days	0	0	0
Total	0	1	1

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

Section 5: Requests for Correction of Personal Information and Notations

Disposition for Correction Requests Received	Number
Notations attached	0
Requests for correction accepted	0
Total	0

Section 6: Extensions

6.1 Reasons for extensions

	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence (Section 70)	External	Internal	
Number of extensions taken								
5	0	5	0	0	0	0	0	0

6.2 Length of extensions

	15(a)(i) Interference with operations				15 (a)(ii) Consultation			15(b) Translation purposes or conversion
	Further review required to determine exemptions	Large volume of pages	Large volume of requests	Documents are difficult to obtain	Cabinet Confidence (Section 70)	External	Internal	
Length of Extensions								
1 to 15 days	0	0	0	0	0	0	0	0
16 to 30 days	0	5	0	0	0	0	0	0
31 days or greater								0
Total	0	5	0	0	0	0	0	0

Section 7: Consultations Received From Other Institutions and Organizations

7.1 Consultations received from other Government of Canada institutions and other organizations

Consultations	Other Government of Canada Institutions	Number of Pages to Review	Other Organizations	Number of Pages to Review
Received during the reporting period	0	0	1	9
Outstanding from the previous reporting period	0	0	0	0
Total	0	0	1	9
Closed during the reporting period	0	0	1	9
Carried over within negotiated timelines	0	0	0	0
Carried over beyond negotiated timelines	0	0	0	0

7.2 Recommendations and completion time for consultations received from other Government of Canada institutions

Recommendation	Number of Days Required to Complete Consultation Requests							
	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
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	0	0	0	0	0	0	0
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	0	0	0	0	0	0	0

7.3 Recommendations and completion time for consultations received from other organizations outside the Government of Canada

Recommendation	Number of days required to complete consultation requests							
	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
Disclose entirely	0	0	0	0	0	0	0	0
Disclose in part	0	0	0	0	0	0	0	0
Exempt entirely	0	1	0	0	0	0	0	1
Exclude entirely	0	0	0	0	0	0	0	0
Consult other institution	0	0	0	0	0	0	0	0
Other	0	0	0	0	0	0	0	0
Total	0	1	0	0	0	0	0	1

Section 8: Completion Time of Consultations on Cabinet Confidences

8.1 Requests with Legal Services

Number of Days	Fewer Than 500 Pages Processed		500-10000 Pages Processed		More than 10000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0
More than 365	0	0	0	0	0	0
Total	0	0	0	0	0	0

8.2 Requests with Privy Council Office

Number of Days	Fewer Than 500 Pages Processed		500-10000 Pages Processed		More than 10000 Pages Processed	
	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed	Number of Requests	Pages Disclosed
1 to 15	0	0	0	0	0	0
16 to 30	0	0	0	0	0	0
31 to 60	0	0	0	0	0	0
61 to 120	0	0	0	0	0	0
121 to 180	0	0	0	0	0	0
181 to 365	0	0	0	0	0	0
More than 365	0	0	0	0	0	0
Total	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 Programs and activities

Number of existing programs or activities that use personal information that have been substantially modified during the reporting period	0
Number of new programs or new activities that use personal information established during the reporting period	0

10.2 Privacy Impact Assessments

Number of PIAs completed	0
Number of PIAs modified	0
Number of PIA summaries published during the reporting period	0
Number of PIAs for which the risk mitigation measures have been reviewed during the reporting period	0

10.3 Privacy Protocols

Number of privacy protocols completed to establish or modify Personal Information Banks	0
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10.4 Institution-specific and Central Personal Information Banks

Personal Information Banks	Active	Created	Terminated	Modified
Institution-specific	0	2	0	0
Central	0	1	0	0
Total	0	3	0	0

10.5 Info Source page

Date of the most recent major change to Personal Information Banks on the Info Source page	2025-12-17
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Section 11: Social Insurance Number

Number of new programs or activities that collect or use Social Insurance Number	0
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Section 12: Privacy Breaches

12.1 Material Privacy Breaches reported

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

12.2 Non-Material Privacy Breaches

Number of non-material privacy breaches	1
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Section 13: Privacy Training

Number of employees that have completed privacy training during the reporting period	2
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Section 14: Resources Related to the Privacy Act

14.1 Allocated Costs

Expenditures		Amount
Salaries		\$75,945
Overtime		\$0
Goods and Services		\$91,167
• Professional services contracts	\$91,167	
• Other	\$0	
Total		\$167,112

14.2 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
2025-2026 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: 2025-04-01 to 2026-03-31

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, 2026	Requests Carried Over that are <i>Beyond</i> Legislated Timelines as of March 31, 2026	Total
Received in 2025-26	2	1	3
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 or earlier	0	0	0
Total	2	1	3

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 2025-26	1
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 or earlier	0
Total	1

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

2.1 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, 2026	Requests Carried Over that are <i>Beyond</i> Legislated Timelines as of March 31, 2026	Total
Received in 2025-26	2	0	2
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 or earlier	0	0	0
Total	2	0	2

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 2025-26	0
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 or earlier	0
Total	0

Section 3: Universal Access under the *Privacy Act*

How many requests were received from foreign nationals outside of Canada in 2025-26?	4
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