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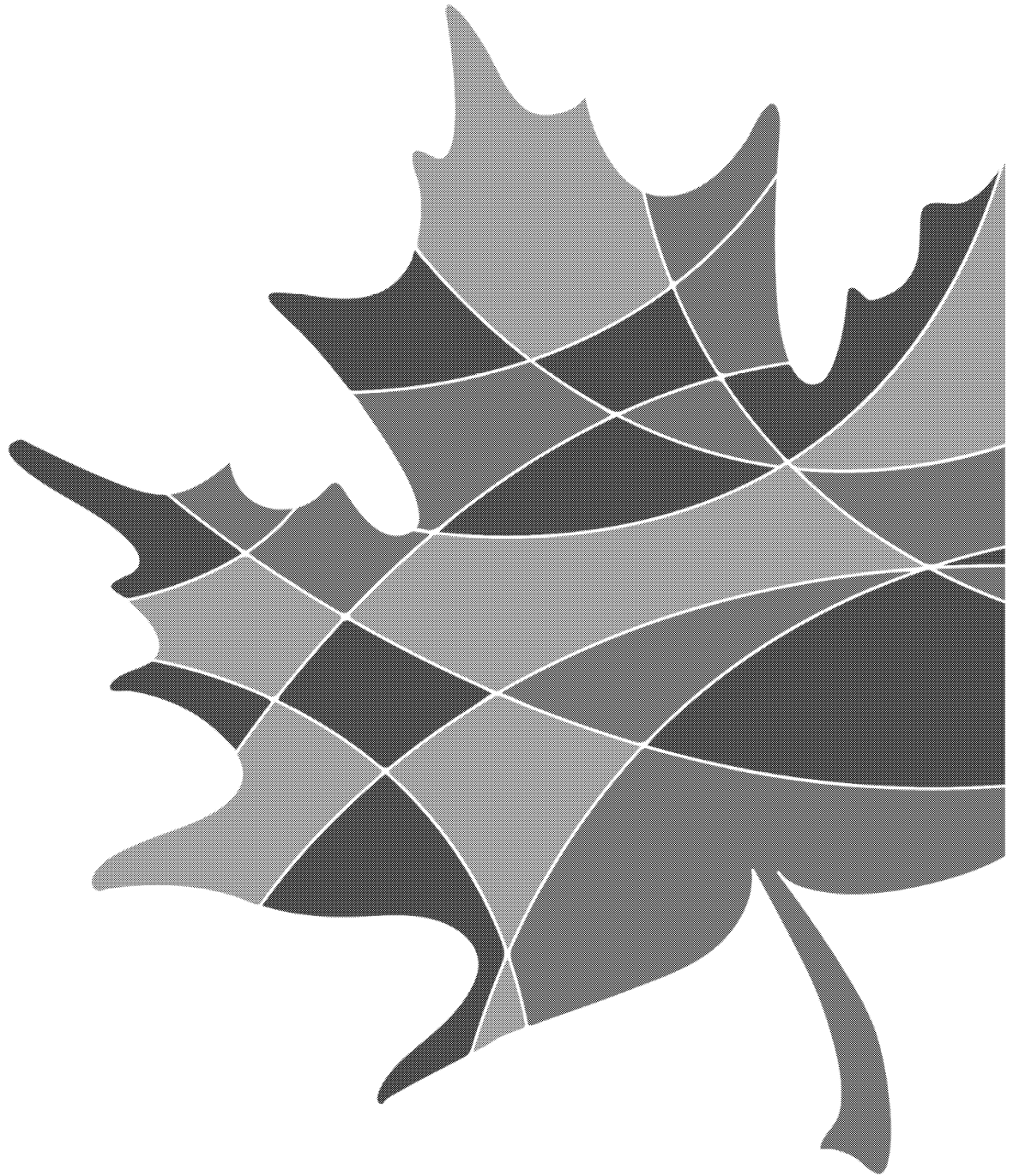L'information divulguée en vertu de la loi sur l'accès à l'information

The Automation Tools on Privately Sponsored Refugee Applications:

Peer review completed by Global Affairs Canada

January 5, 2023

Executive Summary

The following document outlines the results of the peer review conducted by Global Affairs Canada (GAC) on Immigration, Refugees, and Citizenship Canada's (IRCC's) use of automation to assist in processing privately sponsored refugee applications.

A demonstration, as well as documentation of the models, and copies of the Gender Based Analysis + (GBA+), and the Algorithmic Impact Assessment (AIA) were provided to the reviewer.

After analysis of the documentation provided, the reviewer concludes that IRCC's rationale to adopt automation tools to aid in processing Privately Sponsored Refugees is sound, and justified. The methodology used to develop these automation tools have taken potential adverse outcomes into consideration and mitigation strategies are well thought out.

The reviewer recommends that the current mechanisms for quality assurance be maintained and for a Privacy Impact assessment to be completed to help ensure that the processes comply with relevant privacy and legal frameworks.

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1. Objectives

Immigration, Refugees, and Citizenship Canada (IRCC) requested that Global Affairs Canada (GAC) conduct a methodological review on the use of automation to assist in processing privately sponsored refugee applications.

The rationale behind the undertaking of a review by a third independent party is to ensure the integrity, robustness and quality of the work that has been accomplished thus far. GAC reviewed the framework for PSR applications to determine whether the methodology was appropriate, whether the business rules are robust and complete, and whether there are any key gaps in the system.

2. Background

IRCC has automated the processing of PSR applications as of December 2022. The purpose is to automate certain assessments based on specified business rules, as well as administrative steps so that they do not require human intervention.

<u>Two Automation tools</u> for privately sponsored refugees were developed:

1. **Sponsorship Tool**
   For the sponsorship portion of the application, the tool **automatically approves** the sponsors for routine cases, allowing officers to focus on more complex cases requiring increased analysis and discretion.
   - The tool does not refuse or recommend refusing applications.
   - Applications that do not meet the criteria for automated processing go through standard processing by an officer.
2. **Refugee Application Triage Tool**
   For the principal applicant's portion of the application, the tool **triages** applications based on criteria currently used by offices to ensure inventories are organized and the right resource processes the right application.
   - All refugee applications are still assessed by an officer for decision.
   - This tool will only automate a portion of the clerical, repetitive task (sorting the work) that currently occurs before an officer reviews the application and makes a decision. For example, vulnerable cases are sorted into processing bins for urgent processing.

An Algorithmic Impact Assessment has been completed per the Directive on Automated Decision-Making, and can be found here.

Additionally, detailed bug reports are maintained, alongside clear records of automation rules being applied at any given time from launch onwards.

3. Requirement

Methodological review is essentially a "peer" review process of applying expert knowledge of acceptable criteria to determine whether the tools and protocol are adequate.

This report describes what was accomplished so far, including an assessment of the overall merits and identification of the tools and protocols that have been put in place. The intent of the review is to assist IRCC to meet a minimally adequate set of criteria for the work that have been accomplished.

4. Scope of Work

The requirement is to engage the services of GAC to advise whether the following components of PSR automation are robust and maintain integrity:

1. Business applicability
2. Deployment
3. Evaluation and monitoring

While the automation components of the system are being reviewed, the following are considered out of scope:
1. Implementing activity-based (rather than application-based) processing or work sharing on applications
2. Change management activities as part of the roll-out strategy

Guiding questions

Business applicability
- Are the selected business rules appropriate for the program?
- Do the business rules adequately support the program mandate, as listed in the 2022-2023 IRCC Departmental Plan?
- Can the business rules be applied uniformly given the application data provided?

Deployment
- Is the automated system operating in a secure technical environment?
- Does the automated system ensure that client information is handled appropriately?

Evaluation and monitoring
- Can the audit trail clearly identify the system rules in place at a given time?
- Does the quality assurance process adequately allow the identification of gaps or bugs?
- Is there a mechanism in place to identify bugs in the system and report them in a timely manner?

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5. Peer Review Activities

Within IRCC and GAC, the following teams were implicated.

<u>GAC</u>
Consular Program Management and Analytics Division (CNA),
Consular, Security and Emergency Management Branch (CFM)

<u>IRCC</u>
International Network, Operations Sector
Optimization and Modernization (business owners)
Refugee Operations Centre Ottawa (users)
International Network (users):

• Bogota	• Accra	• Dakar	• Colombo
• London	• Dar es Salaam	• Cairo	• New Delhi
• Vienna	• Abu Dhabi	• Amman	• Hong Kong
• Warsaw	• Pretoria	• Ankara	• Manila
• Rome	• Nairobi	• Tel Aviv	• Singapore
• Paris	• Beirut	• Islamabad	• Sydney

Operational Planning and Performance Branch
Advanced Analytics Solutions Center (technical leads)

IRCC tasks were to:
1. Provide key documentation to GAC leads
2. Present the workflow and process details for PSR automation

GAC tasks were to:
1. Meet Subject Matter Experts from IRCC, as listed above, to obtain an overview of automation
2. Review PSR automation documents to complete required analysis, including:
    a. The Algorithmic Impact Assessment
    b. Business rules applied to PSR automation
    c. PSR automation process flow
    d. Gender Based Analysis +
    e. Legal Opinion provided by IRCC Counsel

s.21(1)(b)

6. Analysis

Based on a review of the documentation provided, and an in-depth review of the process with subject matter experts from IRCC, the two automation processes appear to be well thought-out, carefully planned and executed, and addresses key business needs. The rationale for implementing these processes is clear: the target for privately-sponsored refugees has been increased (a ministerial priority) and there is a need to examine business processes to facilitate processing of these higher numbers. Adverse outcomes have been considered, legal risks were carefully reviewed, and a GBA+ analysis was undertaken to ensure that equity-seeking groups were not disproportionately disadvantaged by the automation process. An algorithmic impact assessment (AIA) was completed, and the analysis contained in that document appeared to be clearly justified and accurate. The AIA outlined potential risks, as well as mitigation measures for those risks, which were well outlined and logical.

6.1 Business applicability

For the sponsor applications, the selected business rules are appropriate for the program, and were developed keeping in mind the existing categories of sponsor applications received. The logic of limiting the automation process to Sponsorship Agreement Holders (SAH) is sound given the additional complexity required of applications categories. The fact that the process does not automate refusals is appropriate. For the principal applicant applications, the selected business rules are also appropriate for the program. Given the fact that the automation process is focused on how files are managed internally as opposed to the automation of the decision-making process itself, the process can be expected to produce efficiencies without creating adverse impacts. The potential impact of fettering has been considered and adequately addressed.

For both the sponsor model and the principal applicant model, each of the business rules in the automation process has a clear and well-substantiated rationale for inclusion. The annex outlining the business rules is well documented, with clear rationales for each of the criteria.

The business rules can be applied uniformly, as the application data would include all of the relevant information for each one of the criteria.

6.2 Deployment

The deployment of the automation processes appears to have been well considered, with extensive consultation with subject matter experts to develop the business rules, solicitation of input from internal and external stakeholders to consider legal risks and GBA+ implications, and consideration of communications implications given the high-profile nature of the refugee resettlement program.

The automation process occurs in a secure technical environment (pulled from GCMS and then automatically re-entered with the results of the automation). Client information is protected in

accordance with the legal requirements of the Privacy Act. The fact that the automation model relies on input from officers as opposed to use of historical data ensures that client information during the automation process occurs in a very similar way to the way the information would be treated during a manual process.

6.3 Evaluation and monitoring

The automation process establishes an audit trail in GCMS that allows for scrutiny of every individual application, with the system indicating whether the sponsor application decision was an automated one or not. For the principal applicant process, there is no decision making being automated, so the triaging is simply for more efficient workload management. The two processes are therefore transparent from an audit trail perspective.

The implementation plan included rigorous quality assurance processes that did not reveal any concerns with the automation processes, and an ongoing monitoring mechanism on a weekly basis that tracks applications to ensure that there are no unintended outcomes. This ongoing monitoring adequately allows the identification of any gaps or bugs in the process. The fact that the GBA+ analysis is going to be conducted again 12 months after implementation helps to ensure that adverse effects or unintended outcomes, should any arise, be quickly addressed and mitigated.

7. Recommendations

It is recommended that the current mechanisms for quality assurance on a weekly basis be maintained, and that reviews of the processes as a whole are conducted periodically to ensure that they are functioning as intended. It is noted in the documentation that a complete Privacy Impact Assessment was recommended by internal IRCC stakeholders, and this would help ensure that the processes comply with relevant privacy and legal frameworks.

8. Future Collaborations

GAC is IRCC's service delivery partner for the delivery of passport services to Canadian citizens abroad, and