Algorithmic Impact Assessment Results

Version: 0.9.1

Project Details

1. Name of Respondent
Various Stakeholders at IRCC

2. Job Title
n/a

3. Department
Citizenship and Immigration (Department of)

4. Branch
Various branches at IRCC

5. Project Title
Automation Tools to help process privately sponsored refugee applications

6. Project ID from IT Plan
n/a

7. Departmental Program (from Department Results Framework)
Refugees

8. Project Phase
Implementation [Points: 0]

9. Please provide a project description:
The automation system helps streamline the processing of both parts of Privately Sponsored Refugee applications – the sponsorship part and the refugee part. When reviewing an application, the system will first scan the sponsorship part to identify routine cases that can be automatically approved. All sponsorship parts that are not automatically approved by the system go through the existing manual officer review process. For the second part of the application that refers to the refugee applicant file, the system helps sort and assign applications to officers at migration offices overseas based on office capabilities and officer expertise. This better uses the network of visa officers and reduces differences in processing times across immigration offices. Decisions on the refugee part of the application are not automated. All decisions on this part of the application are made by an officer based on their assessment of the application.

Business Driver / Positive Impact

10. What is motivating your team to introduce automation into this decision-making process? (Check all that apply)
Existing backlog of work or cases
Use innovative approaches
Other (please specify)

11. Please describe
Facilitate more efficient use of IRCC resources in the processing of resettlement applications, assist in managing the growing volume of resettlement visa applications, and improve processing times

About The System

12. Please check which of the following capabilities apply to your system.
Process optimization and workflow automation: Analyzing large data sets to identify and anomalies, cluster patterns, predict outcomes or ways to optimize; and automate specific workflows

Section 1: Impact Level : 2

Current Score: 49

Raw Impact Score: 49

Mitigation Score: 35

Section 2: Requirements Specific to Impact Level 2

Peer Review

At least one of:

- Qualified expert from a federal, provincial, territorial or municipal government institution.
- Qualified members of faculty of a post-secondary institution.
- Qualified researchers from a relevant non-governmental organization.
- Contracted third-party vendor with a related specialization.
- Publishing specifications of the Automated Decision System in a peer-reviewed journal.
- A data and automation advisory board specified by Treasury Board Secretariat.

Notice

Plain language notice posted through all service delivery channels in use (Internet, in person, mail or telephone).

Human-in-the-loop for decisions

Decisions may be rendered without direct human involvement.

Explanation Requirement

In addition to any applicable legal requirement, ensuring that a meaningful explanation is provided with any decision that resulted in the denial of a benefit, a service, or other regulatory action.

Training

Documentation on the design and functionality of the system.

Contingency Planning

None

Approval for the system to operate

None

Other Requirements

The Directive on Automated Decision-Making also includes other requirements that must be met for all impact levels.

Link to the Directive on Automated Decision-Making

Contact your institution's ATIP office to discuss the requirement for a Privacy Impact Assessment as per the Directive on Privacy Impact Assessment.

Section 3: Questions and Answers

Section 3.1: Impact Questions and Answers

Risk Profile

1. Is the project within an area of intense public scrutiny (e.g. because of privacy concerns) and/ or frequent litigation?
Yes [Points: +3]

2. Are clients in this line of business particularly vulnerable?
Yes [Points: +3]

3. Are stakes of the decisions very high?
Yes [Points: +4]

4. Will this project have major impacts on staff, either in terms of their numbers or their roles?
No [Points: +0]

Project Authority

5. Will you require new policy authority for this project?
No [Points: +0]

About the Algorithm

6. The algorithm used will be a (trade) secret
No [Points: +0]

7. The algorithmic process will be difficult to interpret or to explain
No [Points: +0]

About the Decision

8. Does the decision pertain to any of the categories below (check all that apply):
Other (please specify) [Points: +1]

9. Please describe
Immigration services

Impact Assessment

10. Will the system only be used to assist a decision-maker?
No [Points: +0]

11. Will the system be replacing a decision that would otherwise be made by a human?
Yes [Points: +3]

12. Will the system be replacing human decisions that require judgement or discretion?
Yes [Points: +4]

13. Please describe the decision(s) that will be automated
The system will be automating approvals of the sponsorship part of the application for Permanent Residence in the PSR program for certain routine applications. Refusals will not be automated. Even for applications where the approval of the sponsorship part of the application is automated by the model, officers continue to make the final decision on each application.

14. Is the system used by a different part of the organization than the ones who developed it?
Yes [Points: +4]

15. Are the impacts resulting from the decision reversible?
Reversible [Points: +1]

16. How long will impacts from the decision last?
Most impacts are perpetual [Points: +4]

17. Please describe why the impacts resulting from the decision are as per selected option above.
The algorithm will be making a positive eligibility assessment that will only rarely be overturned.

18. The impacts that the decision will have on the rights or freedoms of individuals will likely be:
Little to no impact [Points: +1]

19. Please describe why the impacts resulting from the decision are (as per selected option above).
The system assesses data elements in applications submitted to IRCC to triage applications and to automate certain positive sponsorship determinations. The system rules only use data elements with a clear link to legislative and regulatory requirements for the program. The system never refuses applications nor does it recommend refusals. All refusals continue to be done by humans as per the current practice. All applications for which the sponsorship portion of the application cannot be approved by the system will receive a full individualized assessment by officers in accordance with standard practice. For applications where the positive sponsorship determination is automated by the system, the system determines only that

the sponsorship part of the application has been approved, before the refugee applicant part of the application is triaged through the system and sent to an officer to screen for eligibility and admissibility. Even in cases where the system approves the sponsorship part, officers continue to make the final decision on each application. The impact of the triage performed by the system on decision-making officers is limited because officers will not be aware of the rules used by the system for its triage or automated positive sponsorship determinations, nor will they receive fulsome information about the analysis that was performed by the system. Further, the system does not produce a recommendation to officers. Each assessment by an officer of an application will be individualized. System rules were reviewed by experienced officers, legal, policy, data science, and privacy experts, as well as senior decision-makers to ensure they were logical, understandable and aligned with established eligibility criteria. Regular monitoring and quality assurance measures will also help make sure the system continues to perform as intended and that any unforeseen negative impacts such as bias or discrimination can be identified early and mitigated.

20. The impacts that the decision will have on the health and well-being of individuals will likely be:
Little to no impact [Points: +1]

21. Please describe why the impacts resulting from the decision are (as per selected option above)
The system is expected to have little to no impact on the health and well-being of individuals as it will only automate certain positive sponsorship determinations , and triage the non-automated sponsorship and refugee parts of the application for decision by an officer.

22. The impacts that the decision will have on the economic interests of individuals will likely be:
Little to no impact [Points: +1]

23. Please describe why the impacts resulting from the decision are (as per selected option above)
The system is expected to have little to no impact on the economic interest of individuals as it will only automate certain positive sponsorship determinations , and triage the non-automated sponsorship and refugee parts of the application for decision by an officer.

24. The impacts that the decision will have on the ongoing sustainability of an environmental ecosystem, will likely be:
Little to no impact [Points: +1]

25. Please describe why the impacts resulting from the decision are (as per selected option above)
The system is expected to have little to no impact on the ongoing sustainability of an environmental ecosystem as it will only automate certain positive sponsorship determinations , and triage the non-automated sponsorship and refugee parts of the application for decision by an officer.

About the Data - A. Data Source

26. Will the Automated Decision System use personal information as input data?
Yes [Points: +4]

27. Have you verified that the use of personal information is limited to only what is directly related to delivering a program or service?
Yes [Points: +0]

28. Is the personal information of individuals being used in a decision-making process that directly affects those individuals?
Yes [Points: +2]

29. Have you verified if the system is using personal information in a way that is consistent with: (a) the current Personal Information Banks (PIBs) and Privacy Impact Assessments (PIAs) of your programs or (b) planned or implemented modifications to the PIBs or PIAs that take new uses and processes into account?
Yes [Points: +0]

30. What is the highest security classification of the input data used by the system? (Select one)
Protected B / Protected C [Points: +3]

31. Who controls the data?
Federal government [Points: +1]

32. Will the system use data from multiple different sources?
Yes [Points: +4]

33. Will the system require input data from an Internet- or telephony-connected device? (e.g. Internet of Things, sensor)
No [Points: +0]

34. Will the system interface with other IT systems?
No [Points: +0]

35. Who collected the data used for training the system?
Your institution [Points: +1]

36. Who collected the input data used by the system?
Your institution [Points: +1]

About the Data - B. Type of Data

37. Will the system require the analysis of unstructured data to render a recommendation or a decision?
Yes [Points: 0]

38. What types of unstructured data? (Check all that apply)
Audio and text files [Points: +2]

Section 3.2: Mitigation Questions and Answers

Consultations

1. Internal Stakeholders (Strategic policy and planning, Data Governance, Program Policy, etc.)

Yes [Points: +1]

2. Which Internal Stakeholders have you engaged?
Strategic Policy and Planning
Program Policy
Legal Services
Access to Information and Privacy Office
Communications
Data Governance
Client Experience / Client Relationship Management
Other (describe)

3. Please describe
Resettlement Strategic Operations Division
International Network
Operations Planning and Performance Division
etc

4. External Stakeholders (Civil Society, Academia, Industry, etc.)
Yes [Points: +1]

5. Which External Stakeholders have you engaged?
Office of the Privacy Commissioner
Civil Society

De-Risking and Mitigation Measures - Data Quality

6. Do you have documented processes in place to test datasets against biases and other unexpected outcomes? This could include experience in applying frameworks, methods, guidelines or other assessment tools.
Yes [Points: +2]

7. Is this information publicly available?
No [Points: +0]

8. Have you developed a process to document how data quality issues were resolved during the design process?
Yes [Points: +1]

9. Is this information publicly available?
No [Points: +0]

10. Have you undertaken a Gender Based Analysis Plus of the data?
Yes [Points: +1]

11. Is this information publicly available?
No [Points: +0]

12. Have you assigned accountability in your institution for the design, development, maintenance, and improvement of the system?
Yes [Points: +2]

13. Do you have a documented process to manage the risk that outdated or unreliable data is

used to make an automated decision?
Yes [Points: +2]

14. Is this information publicly available?
No [Points: +0]

15. Is the data used for this system posted on the Open Government Portal?
No [Points: +0]

De-Risking and Mitigation Measures - Procedural Fairness

16. Does the audit trail identify the authority or delegated authority identified in legislation?
Yes [Points: +1]

17. Does the system provide an audit trail that records all the recommendations or decisions made by the system?
Yes [Points: +2]

18. Are all key decision points identifiable in the audit trail?
Yes [Points: +2]

19. Are all key decision points within the automated system's logic linked to the relevant legislation, policy or procedures?
Yes [Points: +1]

20. Do you maintain a current and up to date log detailing all of the changes made to the model and the system?
Yes [Points: +2]

21. Does the system's audit trail indicate all of the decision points made by the system?
Yes [Points: +1]

22. Can the audit trail generated by the system be used to help generate a notification of the decision (including a statement of reasons or other notifications) where required?
Yes [Points: +1]

23. Does the audit trail identify precisely which version of the system was used for each decision it supports?
Yes [Points: +2]

24. Does the audit trail show who an authorized decision-maker is?
Yes [Points: +1]

25. Is the system able to produce reasons for its decisions or recommendations when required?
Yes [Points: +2]

26. Is there a process in place to grant, monitor, and revoke access permission to the system?
Yes [Points: +1]

27. Is there a mechanism to capture feedback by users of the system?
Yes [Points: +1]

28. Is there a recourse process established for clients that wish to challenge the decision?
Yes [Points: +2]

29. Does the system enable human override of system decisions?
Yes [Points: +2]

30. Is there a process in place to log the instances when overrides were performed?
Yes [Points: +1]

31. Does the system's audit trail include change control processes to record modifications to the system's operation or performance?
Yes [Points: +2]

32. Have you prepared a concept case to the Government of Canada Enterprise Architecture Review Board?
No [Points: +0]

De-Risking and Mitigation Measures - Privacy

33. If your system involves the use of personal information, have you undertaken a Privacy Impact Assessment, or updated an existing one?
No [Points: +0]

34. Have you designed and built security and privacy into your systems from the concept stage of the project?
Yes [Points: +1]

35. Is the information used within a closed system (i.e. no connections to the Internet, Intranet or any other system)?
No [Points: +0]

36. If the sharing of personal information is involved, has an agreement or arrangement with appropriate safeguards been established?
No [Points: +0]