



JAN 17 2018

The Honourable Kevin Sorenson  
Chair  
Standing Committee on Public Accounts  
House of Commons  
Ottawa, Ontario  
K1A 0A6

Dear Mr. Sorenson,

On behalf of the Government of Canada, we are pleased to present the Government's Response to the Standing Committee on Public Accounts' Thirty-First report, "*Report 3, Preventing Corruption in Immigration and Border Services of the Spring 2017 Reports of the Auditor General of Canada.*"

We would like to extend our sincere thanks to you and to the Committee for its report and recommendations, which provide us with an excellent opportunity to think critically about the way in which the Government of Canada ensures that it addresses the risk of corruption in its delivery of the immigration program, both at home and abroad.

The Response agrees with the recommendations and provides the Committee with the reports and plans that were requested. The integrity of immigration and border services remains a focus of the Government of Canada and the delivery of services free of corruption is of paramount importance in ensuring this integrity. It is our hope that the Response highlights Canada's global leadership in delivering secure, effective, and innovative border management.

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Should the Committee desire future updates on our progress with implementation and results achieved, we would be happy to provide them.

Once again, we thank the Committee members for their work in preparing this report.

Sincerely,

A handwritten signature in blue ink, appearing to read 'R. Goodale', is written over a horizontal line.

The Honourable Ralph Goodale, P.C., M.P.  
Minister of Public Safety and Emergency Preparedness

The Honourable Ahmed Hussen, P.C., M.P.  
Minister of Immigration, Refugees and Citizenship

Enclosure : (1)



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**GOVERNMENT RESPONSE TO  
THE THIRTY-FIRST REPORT OF THE STANDING COMMITTEE  
ON PUBLIC ACCOUNTS, ENTITLED: *REPORT 3, PREVENTING  
CORRUPTION IN IMMIGRATION AND BORDER SERVICES, OF  
THE SPRING 2017 REPORTS OF THE AUDITOR GENERAL OF CANADA***

**Introduction**

The Government of Canada has carefully considered the Standing Committee on Public Accounts' Thirty-First report, "*Report 3, Preventing Corruption in Immigration and Border Services of the Spring 2017 Reports of the Auditor General of Canada*," which was tabled in the House of Commons on September 26, 2017.

The Government of Canada has risk controls in place – including policies, procedures and activities – to prevent and detect corruption in immigration and border security. While the audit yielded no evidence of corruption, the Government agrees with the recommendations of the Committee and has provided the requested details below.

**Recommendation 1:** The CBSA needs to present a report to the Committee outlining the results of A) the integration of key controls on corruption into the Management Practices Assessment framework and Port Program Assessments; and B) changes designed to ensure that Regional Frontline Management meets these responsibilities.

The Canada Border Services Agency (CBSA) agrees to integrate the assessment of key corruption controls into existing assessment programs; develop targeted training programs for frontline managers to improve their oversight skills; and to raise employee awareness of both the CBSA *Code of Conduct* and the consequences of misconduct. The CBSA will also review and confirm that Regional Frontline Management profiles, responsibilities, and accountabilities are in place regarding corruption controls and will enhance its assessment tools to ensure that Regional Frontline Management meets these responsibilities.

To mitigate corruption and bolster monitoring controls, the CBSA:

- Developed guided questions and integrated them into its Management Practices Assessment (MPA) framework;
- Developed local assessment criteria for monitoring controls, which are currently being used in the Port Program Assessment program that commenced in September 2017; and
- Communicated mandatory training requirements to frontline staff and superintendents.

Each of these activities was completed by July 2017. To assess compliance, the CBSA will monitor its use of operational monitoring controls twice each year over a two-year period. Progress and results achieved will be communicated to CBSA senior management on an annual basis, beginning in April 2018.

In order to ensure that Regional Frontline Management undertakes appropriate monitoring to prevent corruption, the CBSA:

- Reviewed Regional Frontline Management profiles and added key controls as performance indicators to Performance Management Agreements (PMA) for supervisors and executives, which re-enforces the importance of having management fulfill its control function at land border crossings. More specifically, effective for fiscal year 2018-2019, performance indicators relevant to control functions and monitoring will be in place to help further strengthen the CBSA's culture of integrity, operational effectiveness and excellence; and

- Will amend, by April 2018, training requirements to make it mandatory to complete Values, Ethics and Disclosure of Wrongdoing training every two years, consistent with mandatory training for Security Awareness and for Insider Threat.

**Recommendation 2:** IRCC needs to provide the Committee with a report detailing what progress has been made with regard to the implementation of the International Network Professional Conduct Standard.

IRCC agrees with this recommendation. As the OAG noted, the audit did not find any corruption and found that IRCC had an effective regime of controls. However, the department was not monitoring nor effectively communicating to ensure our controls were working as intended. As such, IRCC has implemented the International Network Professional Conduct Standard (INPCS).

The INPCS aims to be a responsive and effective source of fraud management and professional conduct information that creates and sustains continuous improvement, identifies and disseminates best practices, and identifies and resolves gaps and risks by incorporating findings into management practices on an annual basis.

The INPCS was distributed in May 2017 to all International Network offices. All managers are expected to incorporate the INPCS into the management of their offices and to provide leadership on professional conduct to their staff. All Migration Program Managers are expected to discuss the INPCS with their staff by March 31, 2018. In 2017-18, Performance Management Agreements for all IRCC International Network Migration Program Managers include measures to ensure that they are fostering a culture of values and ethics that respects the IRCC Code of Conduct and the Code of Values and Ethics for the Public Sector.

In addition, an International Network Calendar of Activities has been put in place. The calendar includes key dates for the Performance Management Cycle, mandatory annual training and various themed activities throughout the year related to topics such as values and ethics, fraud prevention and security awareness. Every June, during Public Service Week, it is suggested that a Migration Program Manager Award is presented to an employee who has demonstrated exemplary professional conduct to reward model behaviour.

In order to maintain the momentum and high profile status of promoting the importance of superior professional conduct, the following regular communications are planned throughout each annual reporting cycle:

- Formal messaging throughout the year reminds all International Network staff, in Canada and overseas, of values and ethics expectations and employee responsibilities;
- That staff model ethical behaviour by acting with integrity and respect;
- Every office displays the INPCS awareness poster in a highly visible location; and
- Managers are regularly provided with tools and reference materials to facilitate discussions regarding professional conduct with staff.

A critical component of fraud awareness and prevention at visa offices is outreach and learning activities. Mandatory fraud prevention training ensures that staff have sufficient information about what constitutes fraud, what to do in the event fraud is detected, and what behaviour is expected of employees in terms of professional conduct, as well as departmental and Government of Canada norms. International Network ensures that this is done through mandatory training sessions, reinforcing lessons during on-the-job training and ad-hoc training.

The first International Network Annual Report on Professional Conduct will be available in May of 2018, and will report on the first full fiscal year of the implementation of the INPCS. This newly established annual report will be used to raise awareness, form a basis for trend analysis, identify anomalies and risks, demonstrate the effectiveness of controls, and provide a basis for reporting on professional conduct in the International Network.

**Recommendation 3:** IRCC needs to provide the Committee with a report detailing what progress has been made with regard to the International Network Professional Conduct Standard's mechanisms for the systematic monitoring of improper actions related to potential corruption.

The INPCS aims to establish mechanisms to capture baseline data with respect to allegations of misconduct, fact-finding activities, mandated investigations and results on an annual basis. Establishing a baseline will allow International Network not only to report against baseline data but also to track progress and identify trends. The baseline will be used to track, analyze and report on the following annual variances:

- allegations with respect to misconduct;
- fact-finding activities related to allegations;
- mandated investigations in response to allegations;
- single-processor Temporary Resident Visa cases; and
- incidents of unauthorized information access in Global Case Management System.

Through implementation of the INPCS, and to address the OAG finding that IRCC did not have a comprehensive risk assessment in place for corruption, IRCC has put into operation the principles of its Fraud Management Policy Framework (FMPF).

In line with the FMPF, the INPCS focuses on internal fraud prevention through a continuous cycle of awareness/prevention, detection, assessment/response, and reporting. Specifically, this approach aims to:

- ensure that controls in place to prevent malfeasance are working;
- identify and rectify any deficiencies in the existing controls with respect to professional conduct on an annual basis;
- create a framework for annual reporting on the effectiveness of controls, thereby establishing a risk tolerance baseline for future assessments of IN's controls on professional conduct;
- set out systematic tracking and reporting mechanisms to promote continuous improvement; and
- ensure senior management is fully briefed on an annual basis on operational and program risk ratings and on professional conduct performance in IRCC offices outside Canada.

The Framework outlines a series of required risk mitigation activities, such as:

- tracking key document loss incidents;
- recording privacy breaches; and
- reporting on misconduct investigations, including status and results.

It should be noted, however, that the FMPF deals with both internal fraud issues (employee malfeasance) and external fraud (program fraud committed by persons not employed in IRCC offices), while the INPCS focuses on internal fraud in the context of conduct in the International Network.

International Network is establishing an internal risk review process including the Management team and Area Directors. The panel will meet annually to review reporting on the results of risk-related activities for the previous fiscal year.

IRCC will compile results, analyze the findings, and report on both outcomes and trends. Depending on the results of each situation, appropriate corrective actions will be taken. Tracking and detecting possible misconduct form the basis of IRCC's commitment to transparent reporting to Canadians and Parliamentarians on professional conduct.

As previously mentioned, the first International Network Annual Report on Professional Conduct will be available in May of 2018, and will report on the first full fiscal year of implementation. This newly established annual report will be used to raise awareness, form a basis for trend analysis, identify anomalies and risks, demonstrate the effectiveness of controls, and provide a basis for reporting on professional conduct in the International Network.

**Recommendation 4:** The CBSA needs to provide the Committee with a plan to ensure that all employees complete mandatory training, as well as a report detailing what progress has been made with regard to A) completion rates of mandatory employee training; and B) the collection of this information.

The CBSA will continue to provide required mandatory training (on Values, Ethics, and Disclosure of Wrongdoing; Security Awareness; and Insider Threat) to frontline staff and superintendents, ensure that employees are aware of these requirements, and monitor completion rates. The CBSA will also launch a renewed Integrity Awareness Campaign to support a culture of integrity and remind employees of training requirements.

More specifically, to increase the completion rates for mandatory training, the CBSA:

- Developed additional communication tools to increase employees' awareness of training requirements (such as greater use of the Agency intranet website, internal newsletters and bulletins, and outreach from senior CBSA management, for example);
- Made explicit reference to mandatory training in communications regarding the development of Personal Learning Plans that accompany employee Performance Management Agreements; and
- Increased the frequency with which it collects and reports on training completion statistics – monthly reports are now provided to training co-ordinators and management.

These initiatives were completed in September 2017. In addition, the CBSA will:

- Add to the Performance Management Agreements of Regional Frontline Management in 2018-19 the requirement that they ensure that officers are provided with the necessary operational flexibility to complete mandatory training; and
- Revise the CBSA's *Training and Learning Policy* to include a statement that employees are responsible for completing mandatory training and that managers are responsible for ensuring that employees do so; the revision took effect in December 2017.

As of September 30, 2017, the CBSA has achieved the following completion rates for mandatory training to address the risk of corruption:

- **Values, Ethics, and Disclosure of Wrongdoing:** 91.87% (frontline staff) and 95.50% (superintendents);
- **Insider Threat:** 78.13% (frontline staff) and 77.91% (superintendents); and
- **Security Awareness:** 52.51% (frontline staff) and 48.06% (superintendents).

Lower completion rates for the Security Awareness course reflect its status as a refresher requirement, one that must be completed once every two years.



**Recommendation 5:** Global Affairs Canada (GAC) needs to provide the Committee with a plan to ensure that all locally engaged staff working in IRCC's visa program complete mandatory training, as well as a report detailing what progress has been made with regard to A) completion rates of mandatory employee training; and B) the collection of this information.

GAC has completed all management actions in response to the AG's recommendation regarding Values and Ethics training for locally engaged staff. More specifically, GAC:

- Ran monthly training reports on mandatory training and followed up with both employees and managers;
- Sent quarterly broadcasts to all employees to remind them of mandatory training, including on Values and Ethics; and
- Ensured that letters of offer of employment for locally engaged staff indicate that they must read and comply with the Code of Values and Ethics, and modified them to highlight mandatory training requirements, including on Values and Ethics.

These actions were completed in July 2017.

Furthermore, and in order to ensure that locally engaged staff who work in IRCC's visa program complete mandatory training on Values and Ethics, GAC verified that they have a valid account to access on-line courses in November 2017. Ongoing communications efforts will include formal messages to Heads of Mission and locally engaged staff on the importance of completing mandatory training. Moving forward, GAC will continue to produce monthly reports on course completion rates and capture training data in its human resources IT system to monitor and report on the completion of training among locally engaged staff.