

IMMIGRATION, REFUGEES AND CITIZENSHIP CANADA DETAILED ACTION PLAN

to the recommendations of the Report 3, Preventing Corruption in Immigration and Border Services of the Spring 2017 Reports of the Auditor General of Canada

Report Ref. No.	OAG Recommendation	Departmental Response	Description of Final Expected Outcome/Result	Expected Final Completion Date	Key Interim Milestones (Description/Dates)	Responsible Organization/ Point of Contact (Name, Position, Tel #)	<i>Indicator of Achievement</i> (For Committee Use Only)
3	Immigration, Refugees and Citizenship Canada should develop a comprehensive internal fraud risk assessment based on analysis of the effectiveness of its controls.	IRCC agrees with this recommendation. The Department has developed the International Network Professional Conduct Standard (INPCS), which focusses on the comprehensive management of risks related to internal fraud in the international context of program delivery. The standard, which is based on a continuous cycle of awareness, prevention, detection, assessment, response and reporting, has already been incorporated into the International Network Integrated Management Plan and will be fully operational on a continuous basis beginning in the 2017-2018 fiscal year.	With implementation of the INPCS, IRCC will create a responsive and effective source of fraud management and professional conduct information in the international context 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.	March 31, 2018	<p>1) Establish an internal office-based risk profile as a component of the International Network Integrated Management Plan (INIMP). Immigration Program Managers will assign risk ratings associated with overseas operating environments and caseloads. Completion date: Completed - component integrated into the INIMP for 2017/2018.</p> <p>2) Develop a plan to address implementing the key elements of the International Network Professional Conduct Standard. Completion date: Completed – INPCS released to International Network managers on May 10, 2017, with effect from April 1, 2017</p> <p>3) Collect and analyze baseline data on allegations of misconduct, fact-finding activities, mandated investigations and results, single processer cases and unauthorized access in GCMS. Completion date: September 30, 2017</p> <p>4) Establish an internal risk review process incorporating analysis of roll-up information collected through the INIMP, Managerial Checklists and baseline data collection. The review will include an analysis of the effectiveness of existing controls and identify mitigation actions to address key residual and newly identified risks. Completion date: March 31, 2018</p> <p>5) Prepare the International Network Annual Report on Professional Conduct based on the results of the internal risk review. The report will include a trend analysis and mechanisms of monitoring risks and effectiveness controls and will provide a basis for reporting to the ADM Operations on professional conduct in the IN.</p>	Robert Orr, ADM, Operations	

3	<p>Immigration, Refugees and Citizenship Canada should conduct systematic monitoring exercises to detect improper actions that can alert the Department to potential corruption.</p>	<p>IRCC agrees with the recommendation. The International Network Professional Conduct Standard which has been developed by the Department, is based on a continuous cycle of awareness, prevention, detection, assessment, response and reporting. Mechanisms are in place to capture baseline and ongoing data related to activities associated with internal fraud. Establishing baseline data provides information to not only report against, but also to track progress and identify trends or anomalies. Full Implementation of the standard will be effective in 2017-2018 fiscal year.</p>	<p>With implementation of the INPCS, IRCC will create a responsive and effective source of fraud management and professional conduct information in the international context 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 will establish mechanisms in IN to capture baseline data with respect to allegations of misconduct, fact-finding activities, mandated investigations and results on an annual basis.</p>	<p>March 31, 2018</p>	<p>Completion date: March 31, 2018</p> <p>1) Establish a process for the collection of baseline data on allegations of misconduct, fact-finding activities, mandated investigations and results, single processor cases and unauthorized access in GCMS. Completion date: September 30, 2017</p> <p>2) Collect and analyze baseline data and implement mechanisms to track the progress of activities associated with internal fraud. Completion date: September 30, 2017</p> <p>3) Prepare the International Network Annual Report on Professional Conduct based on the results of the risk review. The report will include a trend analysis and mechanisms of monitoring risks and effectiveness controls and will provide a basis for reporting to the ADM Operations on professional conduct in the IN. Completion date: March 31, 2018</p>	<p>Robert Orr, ADM, Operations</p>	
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