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Director General   Directeur général
Integrity Risk   Orientation sur les
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Ottawa K1A 1L1

F- 07790719

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MEMORANDUM TO THE DIRECTOR GENERAL, OPERATIONAL PLANNING AND PERFORMANCE BRANCH AND THE DIRECTOR GENERAL, INTEGRITY RISK MANAGEMENT BRANCH

GOVERNANCE AND BUSINESS OWNERSHIP OF LIGHTHOUSE TOOL

FOR APPROVAL

SUMMARY

- This memorandum seeks your approval of the Lighthouse Governance Framework ('the Framework') to ensure agreement on shared ownership and responsibility.

- The Framework provides oversight on the management of the Lighthouse tool and outlines accountabilities, roles, and responsibilities for its development, implementation and use. Business ownership of Lighthouse will be shared between the Operational Planning and Performance Branch (OPPB) and Integrity Risk Management Branch (IRM).

- Lighthouse is an AI-based risk indicator solution that has been developed to automatically and comprehensively extract risk and fraud patterns from source data from the Global Case Management System for any applicable line of business. The tool does not involve automated decision-making.

- We recommend that you approve the Lighthouse Governance Framework and its business co-ownership by signing the approval page within the Framework as well signing this memorandum by August 18, 2021.

BACKGROUND:

- In recent years, the demand for artificial intelligence (AI) solutions to assist with the Department's program delivery has been steadily increasing, primarily to address challenges in volume management. In April 2020, the Treasury Board Secretariat's *Directive on Automated Decision-Making* came into force to outline high-level requirements for automated solutions in the Government of Canada. In June 2019, IRCC also developed its own internal *Policy Playbook* on Automated Support for Decision-Making.

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- Formerly known as Watchtower, Lighthouse is an AI-based risk indicator solution that has been developed to automatically and comprehensively extract risk and fraud patterns from source data from the Global Case Management System for any applicable line of business. It is a data-mining tool that identifies and presents fact-based information. The tool's findings can be configured to produce customized reports to satisfy various needs for Risk Assessment Units within the integrated processing network, allowing them to direct their resources to potential cases of concern. This will assist Risk Assessment Units with investigations and large-scale trend analysis, and lead to efficiencies in the identification and processing of higher-risk cases.

- Lighthouse does not make recommendations or render administrative decisions about clients or their applications. Since all eligibility and admissibility decisions will be made by decision makers and the tool would not be involved in making any decisions, an Officer of Record would not be required to act as the authority under the Instrument of Designation and Delegation. Measures have been taken to ensure that human intervention is part of every stage of the tool's application.

- In its initial pilot, which ran in summer 2020 on the caseload of global study permit applications, Lighthouse uncovered over 800 unique risk patterns, some of which led to identification of larger-scale fraud trends. By using the tool's full potential and focusing our risk management efforts where attention is needed most, the Operations Sector can potentially create processing efficiencies in cohorts that do not require as much effort.

- A governance framework (in annex) has been drafted to set priorities for Lighthouse's use, explain its processes, outline related roles and responsibilities, and ensure transparency in the usage of the tool.

CURRENT STATUS:

- Each usage of the tool that involves live applications requires a dedicated project charter to complement the Framework by addressing the specifics of the usage in question. By having a broader framework, the general principles of the tool on its usage and governance can be agreed upon in advance which, when supplemented by specific project charters, would facilitate procedures and expedite implementations.

- Business ownership of Lighthouse will be shared between OPPB and IRM, given each branch's mandate and the potentially broad scope of the Lighthouse project. The responsibility of development, implementation and maintenance of the tool will lie with the Advanced Analytics Solutions Centre team within OPPB. The team will focus on the tool's technical design and record-keeping as it relates to the design and configuration data of the tool, ensuring that the privacy and legal requirements and recommendations are followed. IRM will be responsible for operationalizing the program-level aspects of the tool's findings as well as maintaining administrative aspects of the tool, such as quality management and ensuring the governance framework remains evergreen. IRM will also lead working group meetings to bring forward any necessary changes, in order to respond to departmental priorities or changing risk management practices and develop a consistent approach for the department.

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- CDO will play a key role in overseeing the tool's data management. CDO will seek approval on data inputs specific to each implementation or pilot from the Data Executive Steering Committee (DESC), who will in turn inform Issues Management Committee (IMC).

- The processing networks (IN, CN, and DN) and their Risk Assessment Units will operationalize case specific aspects of the tool's findings, and work with IRM and OPPB to map out operational processes and to improve its effectiveness and usage. Case Management Branch will assess larger-scale fraud trends flagged by the tool and ensure resulting business intelligence is shared with all other stakeholders.

- Strategic and Program Policy Branch will be responsible for providing guidance on policies, including Algorithmic Impact Assessments, and for coordinating engagement with other stakeholders and the public.

- Stakeholders such as Migration Health Branch, Citizenship and Passport Programs Branch, and Transformation and Digital Solution Sector (TDSS) may participate in Lighthouse working groups in the future, should the tool's involvement become relevant to their respective mandates.

- This division of roles reflects the approach presented to the Issues Management Committee in December 2018, and aligns with the 2018-2023 Operations Sector Strategic Plan.

CONSULTATIONS:

- The Framework has been developed in close collaboration with key partners. Approval was obtained at the Director level from Operations Planning and Performance Branch, Integrity Risk Management Branch, Centralized Network, International Network, Domestic Network, Immigration Program Guidance Branch, ATIP Division, Legal Services Unit, Strategic Policy and Planning Branch, Case Management Branch, Admissibility Branch, Internal Audit and Accountability Branch, and Chief Data Officer.

RECOMMENDATION(S):

- We recommend that you approve the Framework and its business co-ownership by signing the approval page within the Framework document as well as in this memorandum.

NEXT STEP(S):

- Following your approval, the Framework will be applied to the operational environment starting in fall 2021.

- The second global study permit pilot, which was initially scheduled to run from March to September 2021, is currently in its early consultation phase. Representatives from IRM, OPPB,

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CN, DN, and IN are meeting weekly, reviewing patterns mined by the tool, and agreeing on procedures.

e-approved
Elizabeth Stronach
Director, Integrity Risk Management Branch

e-approved
Steven Gonzalez
Director, Operational Planning and Performance Branch

DG Signature
Alain Desruisseaux
Director General, Integrity Risk Management Branch

☐ I concur

☐ I do not concur

DG Signature
Marie-Josee Dorion
Director General, Operational Planning and Performance Branch

☐ I concur

☐ I do not concur

Annex: Governance Framework for Lighthouse