

November 25, 2025

Drivers of Change in a Digital Era: AI, Information Flows and Immigration

Pathways to Prosperity 2025 National Conference



Mario D. Bellissimo, LL.B., C.S.
Bellissimo Immigration Law Group PC



Introduction

A. IRCC Uses of Automation

B. Digital Distrust and Automated Assumptions?

C. How to Best Leverage the Technology Moving Forward

PART A

IRCC Uses of Automation



What is Automation at IRCC?

- “Automation” = use of business rules that are derived directly from the *Act* and *Regulations* and/or created by officers based on their experience and expertise; some tools use advanced analytics, some officer-devised rules, some both.
- IRCC uses automation, machine learning, and triaging tools for visas, refugee claims, and risk assessments.
- Tools mainly handle routine administrative or clerical steps in application processing and can also support decisions involving officer discretion.



Where Is Automation & Analytics Used?

- Triage & distribution (e.g., Spousal, TRVs, Study Permits)
- Positive eligibility automation (Watchtower, Lighthouse, Chinook, etc.)
- Detecting incomplete files
- Summarizing case info (annotations)
- Responding to inquiries (Quaid)
- Supporting biometric assessment



Types of Automated Tools at IRCC

1. Decision Tools: Approve eligibility (eTAs, TRVs, PSR parts)
2. Triage Tools: Sort applications by complexity (spousal, study, work)
3. Processing Aids: Support officers' workflow (e.g., Chinook, Integrity Trends Tool)

All systems undergo Algorithmic Impact Assessments for bias, fairness, and oversight



Integrity Trends Analysis Tool

The ITAT automates the detection of risk and fraud patterns within applications containing adverse outcomes, such as inadmissibility findings and other administrative enforcement actions.



The patterns are then used to flag applications to Risk Assessment Units, which allows them to decide whether to perform additional verification on the case and decide how to prioritize verification activities.



The results of the verifications are then provided to processing officers who make the final decision. Officers do not know of ITAT's use on a particular case.

IRCC: Digital Platform Modernization (DPM) and AI Integration

- Launched in 2024, DPM expands through 2025–26 to create a single digital client window for all programs. Overhaul IRCC's service model, focus client experience.
- Expanded Online Account (June 2025) now supports visitor visas and adult passport renewals (51,000 visas, 6,700 renewals). Single digital window.
- Client Enquiry Management System (2025) introduces AI-assisted support for faster response times. Designed to reduce delays and streamline client communication.

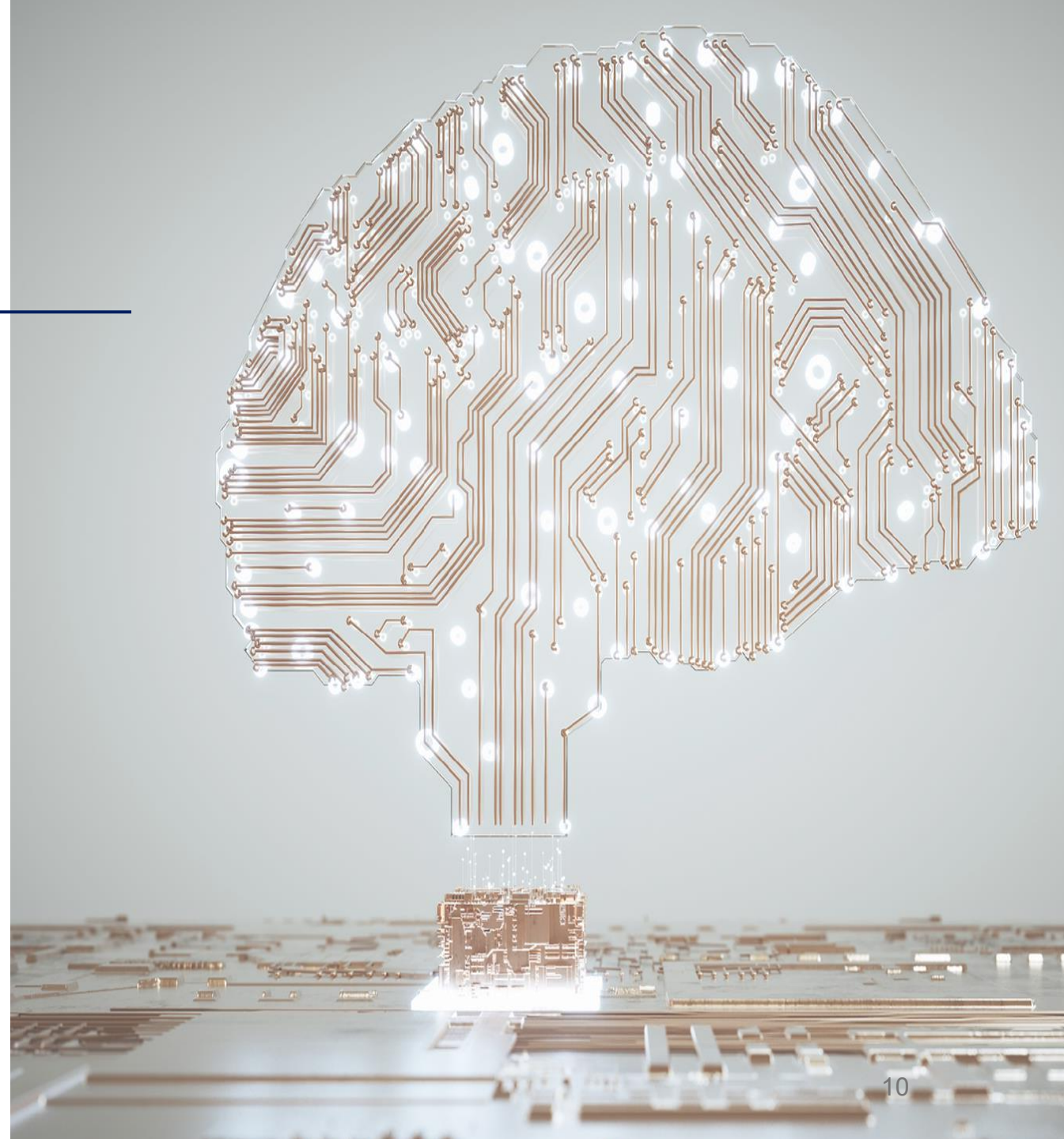
IRCC: Digital Platform Modernization (DPM) and AI Integration



- Digital Visa Pilot (2025–26) will issue visas electronically, eliminating mailing delays. Testing to inform expansion across permit/visa lines.
- AI in Back-Office Operations (Planned Rollout 2025-26): AI assists Express Entry, visitor visa, and eTA programs - human officers retain final decision authority.

PART B

Digital Distrust and Automated Assumptions



Digital Distrust & Automated Assumptions

- From a privacy standpoint, IRCC follows “*privacy by design*” principles.
- **From applicants’ perspectives:**
 1. There was little/no notice, consultation, and disclosure on automated uses or AI supported uses like *Hyria Chinook*, *ROW*, *ITAT* and others like *Quaid*, *Lighthouse*, *Watchtower*, *Quantum*.
 2. Only after ATIP requests, legal challenges, and public pressure, did IRCC begin releasing details.
 3. Transparency was not prioritized.
 4. Issue now framed as operational secrecy versus legal accountability.
- IRCC maintains these systems are internal tools that help officers. Do not make final decisions, so they do not require legal review.

Defining Human in the Loop?

	General	Indicator: N/A Processing	XX	2024/07/17	
		Priority Word Flag: N/A		17:07	

N	General	File processed with the	XX	2024/07/17	
		assistance of Chinook 3+ /		17:07	

Evolution of Reasons

Reasons for the refusal of your application

To help you understand why your application was refused, below are the **Officer Decision Notes (ODN)** specific to your application as they are displayed in IRCC's system. These notes were entered by the officer who assessed and made the final decision on your application.

- I have reviewed the application. The applicant does not have significant family ties outside Canada. The purpose of the applicant's visit to Canada is not consistent with a temporary stay given the details provided in the application. The applicant's assets and financial situation are insufficient to support the stated purpose of travel for themselves (and any accompanying family member(s), if applicable). Weighing the factors in this application, I am not satisfied that the applicant will depart Canada at the end of the period authorized for their stay. For the reasons above, I have refused this application.

Real-World Examples

1. Is judging an applicant's intention to visit based on a sibling who made a refugee claim that has no connection to the present applicant a fair indicator? Officers and, by extension, the AI solution may be stymied by expertise bias as being a reliable indicator of overstaying or making a refugee claim.
2. Where a variable in the algorithm is on the quantitative i.e., number of marriages, as opposed to the qualitative, why did the previous marriages fail. When the focus is on the quantitative, in this case all applicants with more than one marriage will be streamed together for potential fraud.

Human Consequences of Opaque Systems

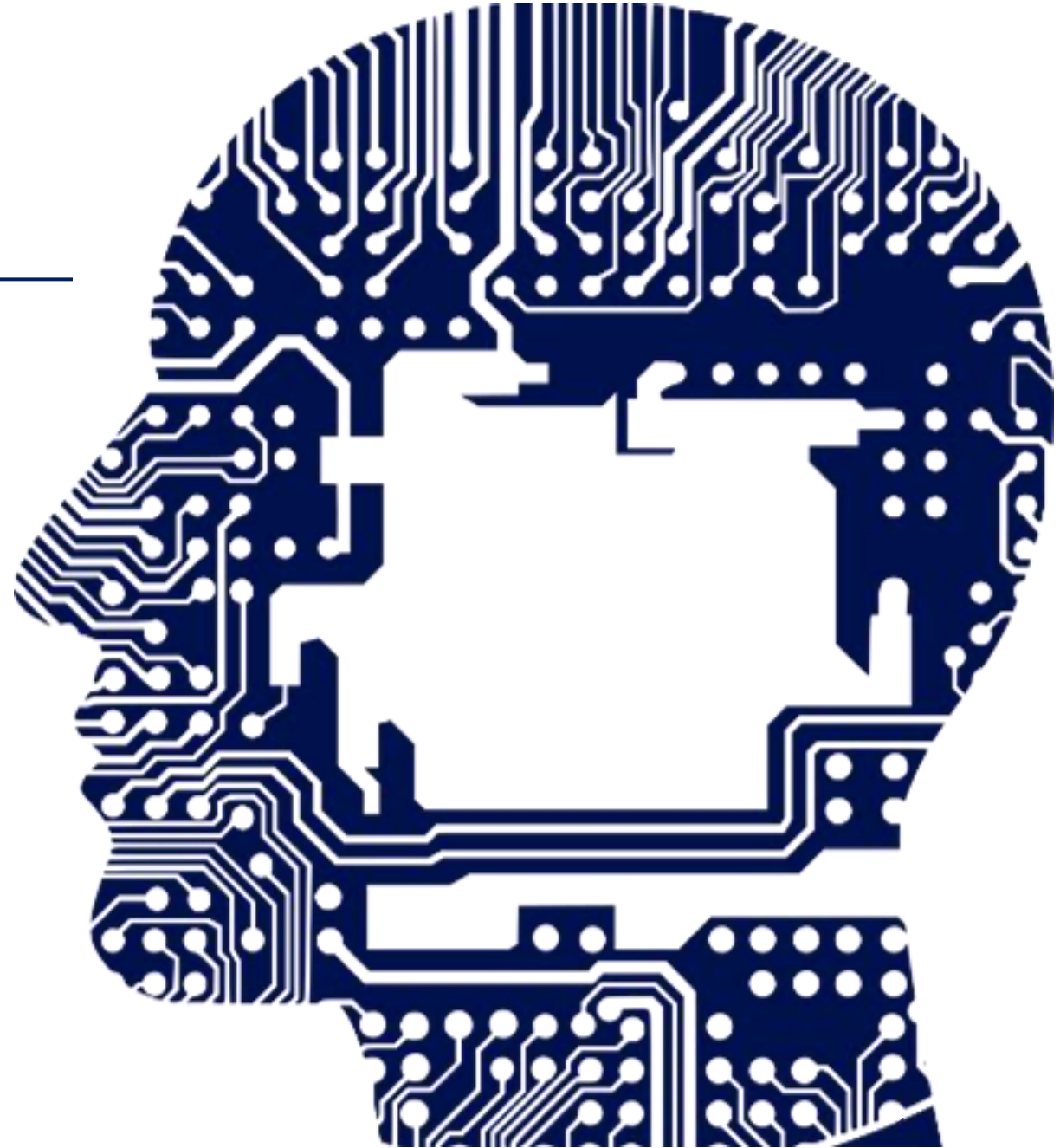
- OCASI (2025): Racialized and Francophone applicants disproportionately refused due to algorithmic proxies (e.g. country of origin, language).
- COSTI (2025): “Access deserts” — refugees, seniors, and low-income families face exclusion from digital-only portals.
- OpenMedia & Canadian Civil Liberties Association warn that new surveillance powers risk algorithmic profiling without judicial oversight.
- Refugee Law Lab (2025): Tech-driven exclusion could erode *Charter* protections.
- BLG PC’s Order, Fairness, and Effectiveness of Canada’s Immigration System Brief (2025) proposed ten recommendations including AI Oversight Unit. BLG PC’s Bill C-12 Brief (2025) reiterated this recommendation and nine others.

Human Consequences of Opaque Systems

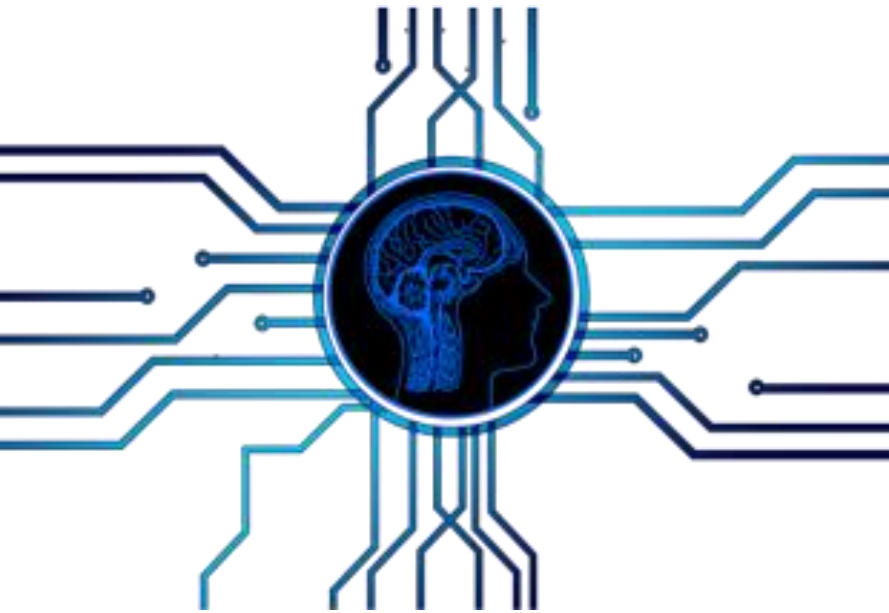
- C.D. Howe Institute (2025): Opaque digital processes → delayed labour-market integration, economic costs.
- BLG PC's Backlogs Brief (2022): Rigid portals & narrow digital windows drive litigation & applicant frustration.
- Canadian Bar Association urged Parliament to legislate for a dedicated AI Oversight Unit, algorithmic-impact assessments, independent audits, human-in-the-loop reviews, transparent reporting.
- BLG PC's AI Brief (2022) proposed ten guardrails including statutory authority, algorithmic transparency, judicial reviewability, accountability for outcomes.

PART C

How To Best Leverage the Technology



Recognizing the Future and Leveraging the Benefits of Smart Analysis and Integration



1. Modernize forms, plain language and plain-language explanations of AI/ADM tools
2. Applicant centric technology
3. Eliminate the digital stampede
4. Guarantee right to meaningful human review
5. Publish full Privacy and Algorithmic Impact Assessments (not just summaries)

Recognizing the Future and Leveraging the Benefits of Smart Analysis and Integration

6. Use “model cards” to explain and demonstrate each AI tool’s function, limits, and oversight
7. Develop Model Card-Style Documentation for Each Tool
8. Allow anonymized research access
9. Communicate officer review times & training
10. Scale individualization and precision at IRCC and in our offices



Questions?



Bellissimo Law Group PC
www.bellissimolawgroup.com
info@bellissimolawgroup.com