

# TRANSPARENCY POLICY



**icccrc**  
IMMIGRATION CONSULTANTS OF  
CANADA REGULATORY COUNCIL  
**crcic**  
CONSEIL DE RÉGLEMENTATION DES  
CONSULTANTS EN IMMIGRATION DU CANADA

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## Table of Contents

- 1. PURPOSE ..... 4
- 2. PRINCIPLES ..... 4
- 3. SCOPE ..... 4
- 4. DEFINITIONS ..... 5
  - 4.1. Transparency ..... 5
  - 4.2. Stakeholder ..... 5
  - 4.3. Council ..... 5
- 5. OBLIGATIONS AND PRACTICES ..... 5
  - 5.1. Legal obligations of ICCRC regarding the disclosure of information ..... 5
  - 5.2. Disclosure of Scheduled Information ..... 6
  - 5.3. Disclosure of Unscheduled Information ..... 6
  - 5.4. Confidential Information ..... 6
- 6. COMMUNICATIONS VEHICLES ..... 7
- 7. COMPLIANCE WITH CANADA’S ANTI-SPAM LEGISLATION ..... 7

## 1. PURPOSE

The Immigration Consultants of Canada Regulatory Council (ICCRC) recognizes that transparency and accountability are important values that will help achieve its mission to protect consumers through the regulation of immigration consultants. In addition, ICCRC's commitment to openness is driven not only by a desire to show good governance, but also to instill and maintain confidence among its stakeholders and promote their active engagement.

## 2. PRINCIPLES

ICCRC balances its commitment to transparency with its obligation to protect the privacy of its staff and Regulated Canadian Immigration Consultants (RCICs), and to comply with the law, the undertakings ICCRC makes, and the rights of third parties. In seeking a balance which determines the terms of this Transparency Policy, ICCRC abides by the following principles:

- 2.1 The mandate of ICCRC is consumer protection. Stakeholders need access to appropriate information in order to trust that ICCRC is fulfilling its mandate.
- 2.2 By providing information, ICCRC helps stakeholders make informed choices while increasing its own accountability.
- 2.3 By applying best practices in outreach communications, ICCRC provides relevant and timely information regarding its mandate, mission, values, strategies, decision-making processes, By-law, regulations and policies, and resource management.
- 2.4 In order for information to be helpful to stakeholders, it must:
  - be timely, easy to find and understand
  - include context
  - improve stakeholders' ability to make informed decisions
- 2.5 Transparency should balance the principles of accountability with those of confidentiality, privacy, and fairness. Consistent with best practices in transparency, the access to information may be limited or denied if it can harm ICCRC, its business relationships, or an individual.

This policy sets forth the obligations and practices of ICCRC regarding the disclosure of information, the vehicles used for disclosure, and the procedure to respond to enquiries and feedback.

## 3. SCOPE

This policy is intended for Directors, Officers, and staff of ICCRC and should serve as a guide for them with respect to the disclosure of information. This policy covers all information which is released by ICCRC to internal and external stakeholders.

## 4. DEFINITIONS

### 4.1. Transparency

Transparency is the voluntary disclosure of information to stakeholders, based on the five principles outlined above, that demonstrate ICCRC's commitment to open communications, good governance, and efficient management of resources and operations.

### 4.2. Stakeholder

A person, group or organization that has a direct or indirect interest in ICCRC. This includes all parties that impact ICCRC or are impacted by ICCRC's mandate, mission, objectives, policies, and overall sustainability. ICCRC defines its stakeholder groups as *internal* and *external*.

Internal stakeholders are:

- Board of Directors and Committees
- Staff
- Members

External stakeholders are:

- Consumers and the general public
- Government
- Not-for-Profit Organizations

Businesses Students of an Immigration Practitioner Program (IPP) can be considered both *internal* and *external* stakeholders, depending on circumstances.

### 4.3. Council

Members of the Board of Directors, committee volunteers, and staff of ICCRC.

## 5. OBLIGATIONS AND PRACTICES

### 5.1. Legal obligations of ICCRC regarding the disclosure of information

ICCRC is committed to governing its member RCICs in a manner that is in the public interest so that RCICs can provide professional and ethical representation and advice. ICCRC is further committed to being accountable to all RCICs.

ICCRC complies with private sector privacy legislation, which governs how ICCRC handles personal information. ICCRC is committed to the principle of access, and upon request will inform individuals about the existence, use, and disclosure of his or her personal information, and provide access to such information, subject to some limited exceptions.

## 5.2. Disclosure of Scheduled Information

ICCRC discloses information to allow stakeholders to make informed decisions. The following outlines the dates that scheduled information is available to stakeholders:

Date	Information
February	<ul style="list-style-type: none"> <li>Registrar's report</li> </ul>
March/April	<ul style="list-style-type: none"> <li>ICCRC newsletter</li> </ul>
May	<ul style="list-style-type: none"> <li>Registrar's report</li> </ul>
July/August	<ul style="list-style-type: none"> <li>ICCRC newsletter</li> </ul>
August	<ul style="list-style-type: none"> <li>Registrar's report</li> <li>CEO Summer report</li> </ul>
September/October	<ul style="list-style-type: none"> <li>ICCRC newsletter</li> <li>Report to Citizenship &amp; Immigration Canada</li> </ul>
October	<ul style="list-style-type: none"> <li>Annual Report with audited financial statements</li> </ul>
December/January	<ul style="list-style-type: none"> <li>ICCRC newsletter</li> </ul>

## 5.3. Disclosure of Unscheduled Information

- Board of Directors meeting minutes
- Board of Directors
- Complaints and discipline statistics
- Referrals to the Discipline Committee and their decisions
- Policies and regulations

## 5.4. Confidential Information

Notwithstanding Sections 5.2 and 5.3, ICCRC does not disclose certain material, including any documents that contain confidential information. For the purposes hereof, the following information may be considered confidential:

- Personal information about third party staff, directors or officers.
- Information that could reasonably be expected to threaten the life or security of another individual.
- Information that is protected by solicitor---client privilege.
- Information that ICCRC's legal counsel advises it not to disclose.
- Information that contains confidential commercial information.
- Information that was generated in the course of a formal dispute resolution process.
- Information that can harm the conduct of an investigation, legal proceedings, or negotiation.
- Information which ICCRC has agreed with a third party to keep confidential.

- Information that must otherwise be refused in accordance with law.

## 6. COMMUNICATIONS VEHICLES

ICCRC will disclose its information to stakeholders using the following:

- ICCRC website ([www.iccrc-crcic.ca](http://www.iccrc-crcic.ca))
- Social media (Facebook, Twitter, LinkedIn)
- Targeted E-blasts (RCICs only)
- Newsletters
- Reports
- Press releases

ICCRC discloses information to RCICs through Annual Reports, e-blasts, direct emails and the Members section of its website. Other stakeholders are privy to information published in annual reports, social media, and the website.

## 7. COMPLIANCE WITH CANADA'S ANTI-SPAM LEGISLATION

ICCRC complies with Canadian anti-spam legislation which governs the sending of commercial electronic messages and the installation of computer programs. Where appropriate, ICCRC seeks express consent to send commercial electronic messages or to install computer programs.