



Canada Border  
Services Agency

President

Ottawa, Canada  
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Agence des services  
frontaliers du Canada

Présidente

PROTECTED B

Ms. Caroline Maynard  
Information Commissioner of Canada  
Office of the Information Commissioner of Canada 30  
Victoria Street  
Gatineau, Quebec K1A 1H3 Dear

Ms. Maynard:

Thank you for providing your findings with respect to the investigation of a complaint regarding the ArriveCAN platform (your file no. 5823-04465). I appreciate the opportunity to respond to the recommendations outlined in the initial report.

I agree with your recommendations, and the Canada Border Services Agency (CBSA) has already taken steps to strengthen its information management practices accordingly. In June 2025, a CBSA Internal Audit of Information Management identified a number of recommendations, which closely align with your recommendations to strengthen the CBSA's information management framework.

Building on this progress, the CBSA is enhancing its information management policies and procedures, reinforcing oversight of record-keeping processes, and clarifying direction regarding the use of non-government personal accounts. In response to the Internal Audit of Information Management, the CBSA has already implemented 20% of the measures outlined in the Management Response and Action Plan (MRAP) and will fully complete the remainder by the end of 2026. The actions outlined in this letter reflect both progress to date and our commitment to further mature the CBSA's information- management practices. The [two documents cited throughout the response](#) are enclosed.

### **Response to the Office of the Information Commissioner of Canada's recommendations**

#### Recommendation 1:

Implement formal, documented policies governing the use of third-party collaboration tools.

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Response:

I agree with the recommendation and acknowledge the importance of ensuring that formal, documented policies must be implemented for the use of third-party collaboration tools. The CBSA has begun to clarify roles and responsibilities for information management and to identify and pursue opportunities to better integrate information management practices into business processes. The CBSA will use your recommendations to further strengthen these practices.

Additionally, the CBSA will establish a formal documented policy governing the use of third-party collaboration tools and other workplace systems to ensure consistent and rationalized information management.

Recommendation 2:

Enhance oversight of record-keeping for major projects and require documented review and retention procedures before decommissioning any system.

Response:

I concur with your recommendation that enhanced oversight of record-keeping and retention procedures are essential. The CBSA recognizes that limited oversight and accountability can result in unidentified and unaddressed issues and acknowledges the importance of strengthening these functions. As a result, information management checkpoints have been embedded at each step of project gating. Documentation, including decisions and all project artifacts, is now required prior to all project approvals. To further address your findings, the CBSA will establish a formal compliance framework to support ongoing monitoring and quality assurance by the end of 2026. The CBSA has recently reviewed and improved policies such as the Project Management Framework.

Your findings highlight risks associated with gaps in awareness and compliance. To address these issues, the CBSA has implemented targeted engagement of business owners and will update or create new policy instruments to close identified gaps while embedding compliance requirements into business process workflows by 2027.

Recommendation 3:

Prohibit or strictly regulate the use of non-government email accounts for CBSA business.

Response:

I recognize that the use of personal email accounts to access Slack and mobile application stores creates risks and hinders transparency in records retrieval. I accept your

recommendation that the CBSA should strictly regulate the use of non-government email accounts for work purposes. To that end, the CBSA will establish a formal policy in this regard. If exceptions are necessary, the CBSA will document the justification, ensure that all records of business value generated through these accounts are transferred to official repositories, ensure that all records in these accounts are searched when an access request relating to these records is received, and maintain oversight to ensure compliance with stated policy.

Recommendation 4:

Reduce reliance on personal storage practices.

Response:

I accept your recommendation. The CBSA is committed to reducing its reliance on personal storage practices. As highlighted in the June 2025 Audit of Information Management, there is a clear need to ensure that all employees are equipped with the appropriate training and tools to consistently apply sound information management practices. The CBSA will focus employee training on the proper storage and maintenance of historical records. At the same time, the CBSA will implement a phased strategy to reduce the usage of personal storage practices by 2027. This will ensure that CBSA information is only stored in approved repositories. As a result, governance, compliance, and discoverability will be significantly improved.

Recommendation 5:

Conduct periodic audits of information management practices.

Response:

I agree with your recommendation that periodic audits or compliance checks of information management practices are essential to ensuring accountability and the establishment of effective processes and procedures. I recognize that regular reviews play a critical role in identifying issues early and help to prevent their reoccurrence. To that end, the CBSA created the Recourse, Standards and Program Integrity Branch in 2025. This new branch is responsible for identifying best practices, addressing gaps before they become systemic issues, and working closely with colleagues across the CBSA to strengthen internal management and controls, processes and practices. This group recently reviewed the CBSA's use of access controls for information in Apollo, CBSA's corporate records repository, which led to a number of actions to address their findings. The CBSA's June 2025 Audit of Information Management confirms the importance of such oversight in identifying gaps and opportunities for continuous improvement. The CBSA is committed to using the Audit's findings, the new branch, and your recommendations to further strengthen its practices and enhance compliance.

Recommendation 6:

Strengthen the ATIP unit's challenge function.

Response:

I agree with your recommendation that the Access to Information and Privacy unit's challenge function should be enhanced. The CBSA is committed to strengthening this function and will implement the necessary improvements before the end of the fiscal year. These enhancements will include the introduction of further direction within routing slips on search expectations and requirements, which will support a more consistent and effective Access to Information and Privacy challenge process. In addition, the Agency will provide more targeted training to Access to Information and Privacy analysts to better identify and address gaps in search efforts. To date, the CBSA has released over 124,500 pages for ArriveCAN, reflecting our commitment to transparency.

**Conclusion**

I value your observations and recommendations, and the CBSA is committed to maintaining the highest possible standards of information management and oversight of our processes. The Agency will continue to collaborate with your office to strengthen our practices.

Thank you again for the opportunity to respond.

Yours sincerely,



2026-04-29

Erin O'Gorman

Enclosures: (2)