May 2, 2023

Via email: Jean-Marc.Gionet@cic.gc.ca

Jean-Marc Gionet
Director General
Immigration, Refugees and Citizenship Canada
365 Laurier Avenue West
Ottawa ON K1A 1L1

Dear Jean-Marc Gionet:

**Re:     Innovative Solutions to Operational Challenges at IRCC**

I write on behalf of the Immigration Law Section of the Canadian Bar Association (CBA Section) to propose innovative solutions to three ongoing operational challenges at Immigration, Refugees and Citizenship Canada: (1) reducing the instances of flagpoling, (2) migrating portals towards a master portal and (3) updating the "Use of a Representative" IMM 5476 form.

The CBA Section wishes to thank you for the open and constructive dialogue over the past few months. Further to our meeting of March 6, 2023, we canvassed CBA Section members on the three issues listed above. We summarize the feedback below and complete reports are appended to this letter.

### 1.  Eliminating Flagpoling

We asked CBA Section members: *What creative solutions, including regulatory amendments, should IRCC adopt to move away from flagpoling and enable clients to conduct their business without having to exit and re-enter the country? Keep in mind maintaining program integrity.*

Key ideas from the survey include:

- Facilitate automatic Work Permit extensions for straightforward cases. This helps avoid individuals from flagpoling when they cannot wait for IRCC to process an extension.
- Meet the 10-day processing standard introduced during the pandemic. In-Canada Work Permit applications currently take approximately 140 days to process (initial applications and extensions).
- Allow rapid change of status from within Canada. To avoid unnecessary travel to the port of entry, IRCC should rapidly process applications for a change of a status within Canada. For

example, a student approved for graduation must wait approximately 140 days for their Post Graduation Work Permit (PGWP) to be processed. Although students can present an IRCC acknowledgement of receipt letter when submitting the PGWP application to a potential employer, some remain hesitant to hire individuals without a valid Work Permit. Some students who are visa exempt may be inclined instead to request their PGWP at the port of entry.

Considering the above, we recommend that IRCC review existing inventory of Work Permit extensions to determine which cases may be eligible for automatic approval – for example, cases where there is no indication of prior IRCC refusals or inadmissibility. Alternatively, IRCC could identify the categories of Work Permit extensions that are eligible for automatic processing and all other categories would follow regular processing.

IRCC has demonstrated innovation when developing the Interim Work Authorization measure to facilitate change of occupation or employment of applicants. This has been very popular among applicants and their employers as it reduces the need for flagpoling. We recommend enforcing the 10-day processing standard for these cases. We also recommend that the measure be made permanent, which requires regulatory amendment.

We recommend that IRCC prioritize web form requests to change status within Canada. Staggered implementation could be considered, starting, for example, with students seeking a status change to worker upon graduation. The PGWP application could be submitted online as usual. However, a web form to change status could be subject to a 10-day processing standard.

## 2. Master Portal

We asked CBA Section members: *If all IRCC portals were converged into one master portal or dashboard, how should it be developed to improve the user experience for clients and representatives?*

Key ideas from the survey include:

- Include all pre-existing portals in one place.
- Ensure that any master portal or dashboard allows representative access from its inception. Previous portals have launched without a representative option (e.g., the PR Representative portal) and access for representatives launched much later, hindering access to counsel.
- Allow missing documents to be submitted and create notifications where documents are missing. Currently, portals serve as a "mailbox" for IRCC and don't have a functionality for submitting missing documents – nor do they notify when a document is missing.
- Allow representatives to upload documents that were not requested via the Master Portal.
- Allow users to create a "client profile" – a single place where client information such as the Unique Client Identifier (UCI) is entered – and pre-fill forms and applications in the portal based on prior/existing applications. This would increase accuracy and consistency, as the chance of human error of data entry would be reduced.
- Consult immigration practitioners before and after the launch of new portals or functions, and ask members of stakeholder organizations to beta test new releases before they are made available to the public. In many cases, portals had to be developed quickly during the pandemic, and without much opportunity to consult.

We recommend that IRCC integrate the role of representatives in the Master Portal from the outset by conceiving a Master Portal (Representative Version). The CBA Section is readily available to

participate in consultations and test functionalities as they are developed and roll out. Given our members' daily use of the IRCC portals, we are well-placed to share constructive feedback. We recommend that the Master Portal not only serve as a "mailbox" for various immigration and citizenship applications or a place of triage, but rather a platform to send and receive communication with IRCC. This would also significantly reduce the flow of web forms.

### 3. "Use of a Representative" form update

We asked CBA Section members: *As a short-term measure, how can IRCC amend form 5476 (Use of a Representative) to best capture the different ways that clients receive advice or representation? As a long-term measure, what is the most efficient way to integrate information on the Use of a Representative form in an online portal?*

Key ideas from the survey include:

- For online e-apps, require the applicant to "sign" their Use of a Representative (IMM 5476) form electronically by typing their name before commencing the application. This could also serve as a mechanism to "link" the representative's portal to an Express Entry application.
- Authorize clients to name a representative for all applications (e.g. until further notice, for a fixed time, for a specific application or line of business). The portal should allow for scaled representation, which both the representative and the client should have to sign.
- Establish a simple, clear and unilateral way for clients or representatives to withdraw representation. Representation is not indefinite, and lawyers sometimes have an ethical obligation to withdraw quickly from files. The process is opaque and difficult to navigate, making it complicated for representatives to withdraw. Representatives can't obtain the applicant's signature to the IMM 5476 form unless they agree to end the representation.

We recommend that the IMM 5476 form (updated version) be integrated directly in e-apps so applicants can review and sign the form electronically. This will help "sync" IRCC's system and ensure that representatives are identified in the system. At times, CBA Section members submit web forms to communicate with IRCC regarding client applications and are informed that they are not the "authorized representative" although a signed IMM 5476 form was submitted with the application. Integrating the IMM 5476 in online portals would hopefully alleviate this issue.

There is a distinction between a lawyer providing legal advice to an applicant versus providing full representation, a distinction recognized by the law societies across Canada. We believe it would be helpful for IRCC to recognize this distinction to avoid lawyers who are only advising clients from receiving important correspondence intended for clients they are not mandated to represent. This could be achieved, for example, by adding a "legal advice only" box into the IMM 5746. Finally, we recommend that IRCC integrate a button in all online IMM 5476 forms for the representative and/or the applicant to "withdraw representation."

We thank you again for the opportunity to share our comments and to collaborate with your team. Should you wish to discuss this matter further, the CBA Section Officers will be in Ottawa from May 31 to June 4 and would welcome an opportunity to meet in person.

Kind regards,

*(original letter signed by Véronique Morissette for Lisa Middlemiss)*

Lisa Middlemiss
Chair, CBA Immigration Law Section

cc.     Marie-Josée Dorion (email: Marie-Josee.Dorion@cic.gc.ca)
        Melany Mercier (email: Melany.Mercier@cic.gc.ca)

**Appendix A:** Summary Report – Flagpoling (also available online)
**Appendix B:** Summary Report – Portals (also available online)
**Appendix C:** Summary Report – "Use of a Representative" form (also available online)

# TOP THOUGHTS - NEW SUMMARY REPORT 2023-04-14 15:32

## RESULTS

The Canadian Bar Association

What creative solutions, including regulatory amendments, should IRCC adopt to move away from flagpoling and enable clients to conduct their business without having to exit and re-enter the country? Keep in mind maintaining program integrity.

**Permit travel on maintained status (no loss of ability to work/study if they travel)** Issue permits in Canada for those who applied outside of Canada who advise they are now in Canada

4.1 ★★★★☆ (6 👤)
Ranked #1 of 16

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**Automatic WP extensions for straightforward cases** Helps avoid clients turning to the border for flagpoles when they cannot wait

4.0 ★★★★☆ (8 👤)
Ranked #2 of 16

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| 4 ★ | ▬▬▬ |
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**Allow change of status from within country.** Avoids unnecessary travel and meeting officers who may not be equipped with the area of law and send it back to IRCC.

4.0 ★★★★☆ (7 👤)
Ranked #3 of 16

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**Allow workers to keep working upon returning to Canada if they left the country while on maintained status - CPC delays should not penalize workers** Many TFWs flagpole because they lose their maintained status upon departure, no matter how proactive in filing WPX 4-6 months out

3.9 ★★★★☆ (4 👤)
Ranked #4 of 16

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**Persons who apply to renew/change terms of employment should be able to work pending approval and eliminate the need for flagpoling.** Eliminate the delay in waiting for IRCC

3.9 ★★★★☆ (4 👤)
Ranked #5 of 16

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processing of work permits. These persons have already been approved for a work permit and are low risk.

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**Expand the process for pre-authorization of changes of employment within 10 days that was introduced during the pandemic and maintain quick turnaround** People flagpole because there is no other way to obtain a quick work permit if they change employers, occupation or location and can't wait 150+ days

3.8 ★★★★☆ (7 👤)
Ranked #6 of 16

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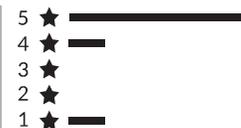
**Flagpoling is not consistent as between Ports of entry. Some ports allow it, others turn people away. Hours posted on the websites are not correct.** This affects the legitimacy of CBSA towards clients and lawyers.

3.7 ★★★★☆ (7 👤)
Ranked #7 of 16

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**Allow maintained status to remain even if applicant exits Canada** Regulations were enacted when processing times were 28 days. Standard is now 4 months. Cannot expect applicant to be stuck in country this long

3.6 ★★★☆☆ (2 👤)
Ranked #8 of 16

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**What is the formal legal reason that requires a person who already had permission to enter Canada to have to leave and re-enter again to change status** Obviously, since exceptions were carved out during COVID, there is no reason it cannot be done away with altogether.

3.5 ★★★☆☆ (6 👤)
Ranked #9 of 16

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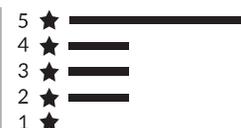
**CBSA already reduced flag poling availability with no legal justification for doing so other than staffing considerations.** May require more inland staff, but fewer border personnel.

3.3 ★★★☆☆ (6 👤)
Ranked #10 of 16

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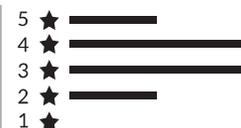
**With almost everything online now, it seems a bit pointless to not allow applications from anywhere?** Flag-poling is at the least inconvenient, and can be extremely stressful. Right now I have to tell clients - I'm not sure this will work, but try it

3.3 ★★★☆☆ (6 👤)
Ranked #11 of 16

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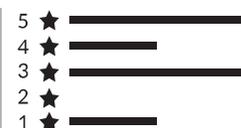
**Open IRCC in-person offices fo with 1st-come 1st-served options for full processing of certain lines of applications, possibly with a triage agent.** Processing times for in-canada online applications and frequency of errors with no real way to address them highlights need for in-person processing.

3.3 ★★★☆☆ (3 👤)
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**Creating a Service Canada style office where it can be done inside of Canada** Change implied status to mean that either old

3.3 ★★★☆☆ (1 👤)
Ranked #13 of 16

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or the new work conditions will apply. Limiting to continuing old
work conditions is a hindrance.

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**Use of AI in processing of Work Permit extensions** AI is used in
Study Permit extensions - it could help reduce the WP backlog
and improve WP processing timelines for EXT to avoid flagpoles

3.2 ★★★☆☆ ( 8 👤 )

Ranked #14 of 16

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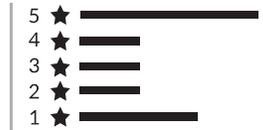
**Create a new portal designed for Canada - USA applicants.
Nexus can be linked there too.** This will help cross-border trade,
reduce CBSA workload, and is justified given the frequent
worker travel to and from USA

3.1 ★★★☆☆ ( 7 👤 )

Ranked #15 of 16

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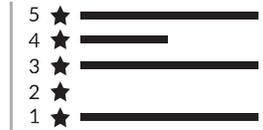
**Create a virtual flag poling mechanism, with built in security
features** With the prevalence of AI in Immigration it would seem
to be the most organic approach to physical flag poling at a POE
to virtual flag poling.

2.9 ★★★☆☆ ( 9 👤 )

Ranked #16 of 16

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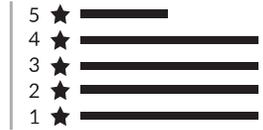
# TOP THOUGHTS - SUMMARY REPORT PORTALS 2

## RESULTS

### The Canadian Bar Association

🔍 Search    ❓    **Search**

If all IRCC portals were converged into one master portal or dashboard, how should it be developed to improve the user experience for clients and representatives?

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**Ensure that any master portal or dashboard allows for representative access from its inception** In the past new portals launched without a representative option and access by representatives was launched much later impacting access to counsel

4.4 ★★★★☆ ( 14 👤 )

Ranked #1 of 32

5 ★ ▬▬▬▬▬
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**1. the ability to add documents or forms in case of errors. 2. notifications to add a missing document** 1. No one is perfect and like agents, users are allowed to make mistakes. 2. instead of deleting a request notify of what is missing

translated by Google ⇄

4.4 ★★★★☆ ( 12 👤 )

Ranked #2 of 32

5 ★ ▬▬▬▬▬
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**Portal should allow for applications/information to be updated at any time and for documents to be uploaded without waiting for request for upload** It is often difficult to update information/upload new documents when circumstances change

4.3 ★★★★☆ ( 14 👤 )

Ranked #3 of 32

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**The master portal should not only be a submission tool but also a tool for receiving communication from IRCC** Existing portals with the exception of APR only permit submission of applications. Correspondence is still being sent by email for others

4.3 ★★★★☆ ( 14 👤 )

Ranked #4 of 32

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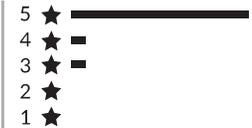
**It should ensure that ALL pre-existing IRCC portals can be identified** To avoid a situation where the master dashboard still doesn't include all portals that Authorized Representatives use

4.3 ★★★★☆ ( 13 👤 )

Ranked #5 of 32

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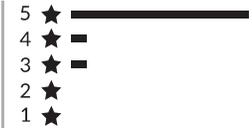
**Ability to create 'client profile' - single place where client info entered, then able to be 'filled' to various forms/applications within the portal.** One time entry, only needing to be updated. Increase consistency, as human error of data entry expected to be minimized.

4.3 ★★★★☆ ( 11 👤 )

Ranked #6 of 32

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**Talking to the people who use the portals would be a good start.** Very clear portals were designed by people who did not have experience filling out immigration forms with some of the unique problems therein

4.3 ★★★★☆ ( 11 👤 )

Ranked #7 of 32

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**A priority should be some way to view the information you have filed after the appl. has been submitted. Or a simple way to download a pdf with all.** We obviously need to know what we've filed, and screenshotting every page before filing is a lot of busy work.

4.3 ★★★★☆ ( 10 👤 )

Ranked #8 of 32

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**Information should only have to be entered once: once for name, address, etc. Abandon forms and ask the questions that need to be asked for the app.** Completing multiple forms that cover the same information is confusing and repetitive.

4.3 ★★★★☆ ( 10 👤 )

Ranked #9 of 32

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**Must be an ability to easily print or save all answers. Should allow access to at least view what was in an application after it is filed.** So labour intensive and awkward to print screen dozens of pages to send to client to review.

4.2 ★★★★☆ ( 7 👤 )

Ranked #10 of 32

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**good software with no to minimal glitches, user-friendly, grey boxes to hint clearly on any issues or glitches.** the glitches before and after submitting the application impacts the faith and trust of users on the application process and IRCC.

4.1 ★★★★☆ ( 14 👤 )

Ranked #11 of 32

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**Invite a team of reps to pilot the portal using real cases. The testers should come from different practice types - large firm, small, clinics** Glitches confuse clients and slow down reps. different types of reps file different types of apps and will identify different glitches.

4.1 ★★★★☆ ( 10 👤 )

Ranked #12 of 32

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**The portal should automatically identify gaps in time when histories are required and warn clients/reps** The current set-up makes it difficult to identify gaps in time.

4.1 ★★★★☆ ( 10 👤 )

Ranked #13 of 32

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**Representatives should be consulted throughout the development and prior to the launch.** Representatives should test the portal and their feedback should be incorporated prior to launch. The ability to print easy to read summaries of app

4.1 ★★★★☆ ( 9 👤 )

Ranked #14 of 32

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**Facilitate printing or extracting pdf copy of information submitted, for clients and representatives to have copies of submission.** Will avoid multiple screenshots - time saving and format faciliative - and ATIP request as info becomes no longer available on portal after submission

4.1 ★★★★☆ ( 6 👤 )

Ranked #15 of 32

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**Representatives should be able to edit information, clients should be able to view** It's important for clients to have visibility as well for their applications

4.0 ★★★★☆ ( 14 👤 )

Ranked #16 of 32

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**1) Do not make it live without testing by professionals 2) do not make it mandatory before massive successful use and feedback by all lines of users.** So much time has been lost on unecessary bugs that are easily detectible (if not fixeable) as soon as you start actually using the portal.

4.0 ★★★★☆ ( 7 👤 )

Ranked #17 of 32

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**An absolute criteria for any portal functionality should be parity between represented and unrepresented applicants. Otherwise we are attacking A91(2)** Department has sidelined reps on citizenship, trv, and other portals at the expense of quality of applications. Reps know this field & are partners.

4.0 ★★★★☆ ( 7 👤 )

Ranked #18 of 32

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**Client and repres should access 1 portal for their needs with single sign on associated with UCI for foreign workers and licensing number for reps** Too many glitches + errors resulting from various portals on both IRCC and client ends; very confusing to keep up with multiple logins

4.0 ★★★★☆ (7 👤)

Ranked #19 of 32

5 ★ ▬▬▬▬
4 ★
3 ★ ▬
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**Have ability to go back and review information once submitted** Record keeping

4.0 ★★★★☆ (5 👤)

Ranked #20 of 32

5 ★ ▬▬▬▬
4 ★
3 ★
2 ★
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**Create pdf copies of all applications - Automatic download** This is so important for non attorney users, they never have a copy of their files.

3.9 ★★★★☆ (4 👤)

Ranked #21 of 32

5 ★ ▬▬▬▬
4 ★
3 ★
2 ★
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**The portal should combine all the info needed so we don't need to re-enter info repeatedly into different 'forms'. There should be no need for forms.** Requiring us to re-enter addresses, family members' names, etc etc in different forms is a waste of time when the portal should be able to streamline

3.8 ★★★★☆ (3 👤)

Ranked #22 of 32

5 ★ ▬▬▬▬
4 ★
3 ★
2 ★
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**They have to get lawyers to help with the development, as the current portals are clearly not developed by people who know how the system works**

3.8 ★★★★☆ (3 👤)

Ranked #23 of 32

5 ★ ▬▬▬▬
4 ★
3 ★
2 ★
1 ★

**They should not even consider this until they have fixed all the problems with the current portals.**

3.8 ★★★★☆ (3 👤)

Ranked #24 of 32

5 ★ ▬▬▬
4 ★
3 ★
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**What would be great is if we could be able to: - search easily by file number, - can see all messages/notifications without having to search for them.** It would save time to be able to find application more easily. It would help to avoid missing out on new messages.

3.6 ★★★★☆ (2 👤)

Ranked #25 of 32

5 ★ ▬▬▬▬
4 ★
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1 ★

**On the client portal, advise them about where they can find advice to help with the app. Include links to legal clinics, law society, ICRCC.** These portals are confusing and difficult for

3.5 ★★★☆☆ (10 👤)

5 ★ ▬▬▬▬
4 ★
3 ★ ▬▬▬

clients, esp those with vulnerabilities who are most at risk from unauthorized reps. They need help.

Ranked #26 of 32

2 ★
1 ★

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**A master portal makes very good sense as it is extremely frustrating to have so many different portals.**

3.5 ★★★⯨☆ ( 3 👤 )

Ranked #27 of 32

5 ★
4 ★
3 ★
2 ★
1 ★

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**I am against a master protal** IRCC 's history in Portal developments. In particular, do not agree with refugee stream mixing with immigration streams. Forcing generalities not good

3.4 ★★★⯨☆ ( 13 👤 )

Ranked #28 of 32

5 ★
4 ★
3 ★
2 ★
1 ★

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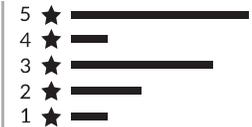
**Add something like "bookmarks"** So that users can go back and forth as needed.

3.3 ★★★☆☆ ( 1 👤 )

Ranked #29 of 32

5 ★
4 ★
3 ★
2 ★
1 ★

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**Eliminate the hidden fields (sub-questions)** So that users can see everything plainly, without having to go back and forth into sub-questions.

3.3 ★★★⯨☆ ( 1 👤 )

Ranked #30 of 32

5 ★
4 ★
3 ★
2 ★
1 ★

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**Make instructions about address history, personal history and travel history clear** So that users don't have to put down repetitive information

3.3 ★★★☆☆ ( 1 👤 )

Ranked #31 of 32

5 ★
4 ★
3 ★
2 ★
1 ★

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**IRCC should fund legal clinics to do public legal information sessions and videos that help people learn to use the portals.** IRCC has reduced front-line staff and closed offices. Very few sources of help that do not charge money, especially in rural and remote areas.

3.2 ★★★☆☆ ( 10 👤 )

Ranked #32 of 32

5 ★
4 ★
3 ★
2 ★
1 ★
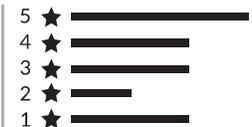
# TOP THOUGHTS - SUMMARY REPORT FORM 5476

## RESULTS

The Canadian Bar Association

🔍 Search ⓘ **Search**

As a short-term measure, how can IRCC amend form 5476 ("Use of a Representative") to best capture the different ways that clients receive advice or representation? As a long-term measure, what is the most efficient way to integrate information on the Use of a Representative form in an online portal?

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**Consulted with but am not represented by. Representation is ongoing unless revoked. No need to add office processing (unknown).** Put Name of Rep and Rep contact on one page. Allow electronic signature or validation through acceptance in portal and no need Use of Rep like OINP

4.1 ★★★★☆ (8 👤)

Ranked #1 of 17

5 ★
4 ★
3 ★
2 ★
1 ★

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**There should be a streamlined mechanism to withdraw representation** This would be important too if the IMM 5476 is integrated in the online portals

4.1 ★★★★☆ (8 👤)

Ranked #2 of 17

5 ★
4 ★
3 ★
2 ★
1 ★

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**For an online e-app, IRCC could require the client to "sign" the IMM 5476 before the representative starts the application** Ensures representation from the outsset

4.0 ★★★★☆ (9 👤)

Ranked #3 of 17

5 ★
4 ★
3 ★
2 ★
1 ★

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**The IMM5476 should be simplified, it also should refer specifically to the term "Lawyer" vs. other immigration representatives.**

4.0 ★★★★☆ (9 👤)

Ranked #4 of 17

5 ★
4 ★
3 ★
2 ★
1 ★

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**Allow clients to indicate on the IMM 5476 whether they are mandating the representative or only seeking legal advice** The current form does not make this distinction

3.9 ★★★★☆ (9 👤)

Ranked #5 of 17

5 ★
4 ★
3 ★
2 ★
1 ★
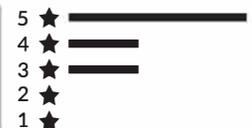
**Completely separate form for advice vs representation.** I don't want to receive communication for a client to whom I only gave advice. Trying to fix this is slow, frustrating, & should be unnecessary

3.9 ★★★★☆ ( 9 👤 )

Ranked #6 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬▬▬▬▬
3 ★ ▬
2 ★
1 ★

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**Integrate the IMM 5476 form in the online e-applications** Avoids uploading a stand alone form and ensure client reviews

3.9 ★★★★☆ ( 9 👤 )

Ranked #7 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬
3 ★ ▬▬▬
2 ★
1 ★

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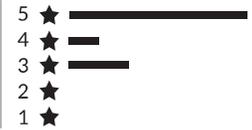
**have check boxes - advice received (doesn't need to be signed by rep), allow IRCC to communicate with rep (does need to be approved by rep), etc.** Need to distinguish from giving advice vs full representation

3.8 ★★★★☆ ( 8 👤 )

Ranked #8 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬▬▬▬▬
3 ★ ▬▬
2 ★
1 ★

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**Explicit instructions for how they want reps to appear on these forms.** Far too many webforms are rejected for "issues" with the 5476. Never know what issues are.

3.8 ★★★★☆ ( 7 👤 )

Ranked #9 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬▬▬▬▬
3 ★ ▬▬
2 ★
1 ★

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**A 'legal advice only' box can be added for check mark, in addition to the box for adding a representative.** Ensures legislative compliance on a form recognized by IRCC.

3.7 ★★★★☆ ( 9 👤 )

Ranked #10 of 17

5 ★ ▬▬▬▬▬
4 ★ ▬▬▬▬▬
3 ★ ▬▬
2 ★ ▬▬
1 ★

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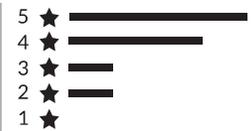
**There should be a completely separate form to capture advice vs representation. And a 3rd form for withdrawing representation.** It can't all be done in the 5476 as there are already too many errors with how that form is processed by IRCC.

3.7 ★★★★☆ ( 7 👤 )

Ranked #11 of 17

5 ★ ▬▬▬▬▬
4 ★ ▬▬▬▬▬
3 ★ ▬▬▬▬▬
2 ★
1 ★

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**My question is whether a form 5476 is needed, if a representative only provided advice or review services to an application, but not a representation** If even advice or review makes 5476 necessary, isn't that overbreathing?

3.7 ★★★★☆ ( 4 👤 )

Ranked #12 of 17

5 ★ ▬▬▬▬▬
4 ★ ▬▬▬▬▬
3 ★
2 ★
1 ★

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**Long: Quebec Immigration who has done well on this front: Rep initiates madate - Client gets email to confirm - Clear document generated confirming.** Will reduce delays in IRCC acknowledging rep status. Uses similar level of security as current PRportal signing process.

3.5 ★★★⯪☆ ( 6 👤 )

Ranked #13 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬▬▬▬
3 ★ ▬▬▬
2 ★ ▬▬▬
1 ★

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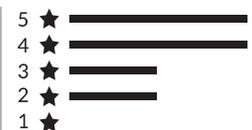
**Allow for representation only limited to a certain act** Counsel should not be on the file for longer then agreed or obtain information not relevant to the scope of their limited retainer

3.5 ★★★⯪☆ ( 3 👤 )

Ranked #14 of 17

5 ★ ▬▬▬▬
4 ★ ▬▬▬▬▬▬
3 ★
2 ★
1 ★

**Have authorization automatically expire once an application is completed and any further application would require a new 5476** Reduce privacy breaches caused when IRCC erroneously directs correspondence on a matter to counsel who had represented individual with previous matter

3.4 ★★★⯪☆ (7 👤)

Ranked #15 of 17

5 ★ ▬▬▬▬▬▬
4 ★
3 ★ ▬▬
2 ★ ▬▬
1 ★ ▬▬

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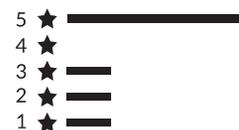
**Short: include checkbox with 3 options: 1) I am declaring that I consulted a rep 2) I am naming a representative for this app 3) I am cancelling rep** Because currently there is a regulatory obligation to disclose when you consulted a rep and no way to do so without accidentally naming them rep.

3.4 ★★★⯪☆ (6 👤)

Ranked #16 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬▬▬▬▬▬
3 ★ ▬▬▬▬
2 ★
1 ★ ▬▬▬

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**Where is the issue?** I think there are a lot more important things to be focusing on.

3.4 ★★★⯪☆ (2 👤)

Ranked #17 of 17

5 ★ ▬▬▬▬▬▬
4 ★ ▬▬▬▬▬▬
3 ★
2 ★
1 ★