



Canada Border
Services Agency

Agence des services
frontaliers du Canada



Evaluation of travellers processing through a GBA+ lens

Evaluation Report

Internal Audit and Program
Evaluation Directorate

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Note: [*] An asterisk appears where sensitive information has been removed in accordance with the Access to Information Act and the Privacy Act.

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Acronyms and abbreviations

ACP	Agency Collaborative Platform	OGD	Other Government Department
API	Advance Passenger Information	ORA	Operational Reporting Application
BSO	Border Services Officer	PAXIS	Passenger Information System
CBSA	Canada Border Services Agency	PED	Program Evaluation Division
CDO	Chief Data Office	PIK	Primary Inspection Kiosk
EA	Enterprise Architecture	PIL	Primary Inspection Line
FCMB	Finance and Corporate Management Branch	PNR	Passenger Name Record
FLT	Flight List Targeting	SBT	Scenario Based Targeting
GBA+	Gender-Based Analysis Plus	SPB	Strategic Policy Branch
ICES	Integrated Customs Enforcement System	SPPH	Secondary Processing Passage History
IEB	Intelligence and Enforcement Branch	Supt	Superintendent
ISTB	Information, Science, and Technology Branch	TB	Travellers Branch
IT	Information Technology	VP	Vice-President
NTC	National Targeting Centre		

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1. Introduction

1.1 Evaluation purpose and scope

This report presents the results of the Evaluation of travellers processing through a Gender-Based Analysis Plus (GBA+) lens. In accordance with the 2016 Treasury Board Policy on Results, the evaluation examined how the Canada Border Services Agency (CBSA) travellers processing continuum and its activities and outcomes impact diverse groups of travellers. The evaluation also uses GBA+ to offer insights on the effectiveness of traveller processing in identifying and mitigating risk at the borders. Finally, it provides suggestions on how the Agency can strengthen GBA+ in the travellers stream in the future. The evaluation examined traveller processing between fiscal year (FY) 2014-2015 and FY 2019-2020.

1.2 Description of the travellers continuum

The travellers processing continuum, as described in this report, comprises the following responsibility areas within the CBSA:

- Travellers Branch
- National Targeting Centre (Intelligence and Enforcement Branch)
- Recourse Directorate (Finance and Corporate Management Branch)

While the Travellers Branch holds the primary responsibility of processing travellers at the border, its activities are supported by the National Targeting Centre (NTC) and the Resource Directorate (refer to Appendix C). This evaluation focused on the Travellers Branch and NTC activities due to their roles in making decisions before or upon the arrival of travellers to a Canadian port of entry.

The processing of travellers at the border, as a key program activity, supports the Government of Canada's commitment to provide greater security and opportunity for Canadians. The CBSA accomplishes this by facilitating legitimate travel across the border smoothly and efficiently, while identifying and mitigating safety and security threats. The CBSA protects the safety and security of Canadians by ensuring travellers are in compliance with applicable legislation and by managing non-compliance.

The screening and primary inspection activities are conducted before or upon arrival at a port of entry to determine whether travellers and their goods meet the requirements of relevant Other Government Departments (OGDs), as well as customs and immigration legislation. In the air mode, the processing of travellers is a continuum of activities that begins with the analysis of traveller information provided by commercial airlines. The National Targeting Centre (NTC)

conducts targeting activities to identify and intercept suspected high-risk travellers by analyzing Advance Passenger Information (API) and Passenger Name Record (PNR) data.¹

The NTC develops scenarios which, through query rules, are used to further assess the risks posed by incoming travellers before their arrival at an air port of entry in Canada. Scenarios are developed based on information from a variety of sources, such as recent significant interdictions, historical enforcement, and intelligence information. The CBSA has established a governance framework for the review of scenarios for effectiveness and for proportionality based on a commitment made to the Office of the Privacy Commissioner of Canada. Prior to activation, the Targeting Travellers Unit reviews scenarios for operational impacts and implementation, with the objective of minimizing traveller impacts. Scenarios are also reviewed every 12 months for considerations, such as human rights, civil liberties, and privacy.

The role of the Travellers Branch is to facilitate the free flow of legitimate travellers and goods at various ports of entry, ensure that they comply with applicable legislation, and manage non-compliance. At the primary inspection stage, an individual is granted entry or is referred for further processing (e.g. payment of duties and taxes, issuance of a document) and/or examination. Primary inspections are mainly conducted in person or at a kiosk in the air mode.

Referrals to secondary processing can be mandatory, selective, or random:

- **Mandatory referrals:** A referral that a Border Services Officer (BSO) must make for further documentation or examination, whether it is for CBSA purposes or for that of other government departments. [*]
- **Selective referrals:** A referral that a BSO makes to the secondary inspection area following the establishment of the point of finality because they suspect that additional examination or investigation is necessary to make a decision on release.
- **Random referrals:** Referrals based on a system, sometimes computer generated, which selects shipments and persons for examination in an indefinite pattern.

There are also many reasons why a traveller is referred to secondary examination. These include customs or OGD examinations, immigration investigation and regulatory duties, or fees and questions regarding the travellers' documentation.

¹ Targets are issued based on various indicators. When risk cannot be negated for a traveller, a target is issued. Gender, by itself, is not used by the NTC as an indicator for targeting.

If it is suspected that a traveller has concealed goods on or about their person that may contravene the *Customs Act*, a search may be conducted. Frontline personnel perform two types of searches that the Supreme Court of Canada does not view as part of routine processing: disrobing and cavity searches. Disrobing involves the removal of clothing, while a cavity search involves physical contact to examine the body. In instances where a cavity search is deemed necessary, persons are transported to medical facilities at which medical professionals conduct cavity searches. BSOs monitor, but do not perform, cavity searches. A Superintendent must authorize all personal searches, and these have to be supported by the appropriate justification and rationale before being conducted.

Overall, the evaluation found that caution is required when analyzing and reporting on the results of GBA+, particularly when using CBSA operational data. There are limitations associated with CBSA operational data, as a quantitative line of evidence. These challenges are outlined throughout the report. While an analysis of operational data can highlight certain trends, it can lack the important context provided by the Agency's policies, practices, and procedures when it is presented on its own. Further, it does not reflect the broader social contexts that may affect a traveller's experience at the border.

Additionally, referrals and targets are made or issued based on a combination of experience, enforcement trends, training, and other sources of information. This makes it difficult to isolate the specific reasons for issuing a target, referring a traveller to secondary, or conducting an examination or a personal search. This is an important consideration when reading through the results presented in this report.

While the evaluation does rely on CBSA operational data for certain analyses presented in this report, the results should be viewed as indicative only. At this time, due to the limitations discussed, it is not possible to draw any conclusions on GBA+ using the Agency's operational data. The quantitative results of this evaluation are used to show areas that may call for further exploration, by the Agency, once the proper mechanisms and resources are in place to support a more comprehensive GBA+ within the travellers stream in the future.

1.2.1 Overall trends in the travellers continuum

Between FY 2015-2016 and FY 2018-2019, the number of overall incoming passages in the traveller stream increased across all modes. This trend was also observed in the number of NTC targets (Air mode) and primary referrals (Air mode) issued.²

As a result of COVID-19 travel restrictions, volumes of incoming passages, targets, and primary referrals have all declined. This evaluation does not focus on traveller processing during the

² In addition to rising traveller volumes, this may also have been the result of refinements in targeting/referral practices and changes in risk.

COVID period. Trends in incoming traveller passages, including typical patterns of seasonal fluctuation, may also change post-pandemic.

1.3 Evaluation scope

The evaluation scope was approved by the Performance Measurement and Evaluation Committee (PMEC) in January 2020.

Table 1: Evaluation scope

In scope	Out of scope
<ul style="list-style-type: none"> To what extent does the scenario based targeting (SBT) approach consider impacts on travellers, through a GBA+ lens, when targeting travellers? To what extent GBA+ variables were considered in traveller inspections at ports of entry in Canada between FY2014-2015 and FY2019-2020? To what extent does the Travellers Program consider the development and achievement of its outputs and outcomes through the GBA+ lens? How does the Travellers Program consider GBA+ variables between and within target population groups? Are diverse groups treated equitably by the program? 	<ul style="list-style-type: none"> Travellers Program relevance and efficiency Effectiveness and efficiency of OGDs Mandatory immigration referrals to secondary examinations Overseas processing of travellers Trusted Traveller Programs (NEXUS and CANPASS) Biometric verification (the Traveller Policy Division is currently completing a GBA+ specific to the expanded use of facial verification under Traveller Modernization) Negotiated agreements and arrangements with partners, including agreements with airport authorities and airlines.

What did the evaluation focus on?

- **Activities:** NTC pre-arrival targeting, primary referrals (at-border), and secondary examinations and enforcement (excluding immigration enforcement under IRPA)
 - **Modes:** Air mode (exception: all modes when assessing personal searches)
 - **Referral areas:** Customs (exception: immigration and customs for calculating referral rates)
 - **Referrals types:** Selective referrals (exception: all referral types were included in the calculation of referral rates)
- Referral sources:** Primary Inspection Line, Point, and Roving officers. (exception: all sources for calculating referral rates)

The evaluation focused primarily on the Air mode, as there are more extensive and diverse quantitative data sets available to facilitate a more comprehensive GBA+ of the travellers continuum.

The evaluation scope was also further refined to focus specifically on customs selective referrals, when undertaking certain analysis.

- **Referral rates in the air mode:** The analysis of referral rates presented here include all possible referrals, including: referral areas (immigration and customs), referral types (mandatory, random, selective), and sources. For this reason, referral rates by citizenship did not include Canada (to control for immigration referrals).
- **Selective referrals in the air mode:** The analysis of selective referral proportions, by demographic factors, presented here focus on customs selective referrals made by Primary Inspection Line (PIL) Officers, Rovers, and Point Officers and excludes all mandatory referrals. This, in large part, removes the “mandatory” element of a referral (e.g. student visa) and compares “officer judgement” in issuing a selective referral.

It is important to note that the selective referral logic used at PIK is different than that used by frontline officers. Other than system matches, most PIK selective referrals are due to inconsistent information provided by travellers in their declarations. PIK issues a receipt that indicates declaration cues to inform a referral. However, a BSO makes the final decision to release or refer to secondary. In turn, this referral source was excluded from analyses of customs selective referrals.

The evaluation also calculated resultant rates for examining the effectiveness of the Agency’s risk identification and mitigation activities in the travellers stream. However, it is recognized that the resultant rate is only one metric that can be used to examine level of risk among multiple risk indicators. The value for duty (VFD) and/or quantity of each seizure, for example, were not the focus of this evaluation. For more information on the challenges and limitations associated with calculating resultant rates, refer to Appendix E.

1.4 Evaluation methodology

A GBA+ lens was used to assess how the travellers continuum and its activities and outcomes impact diverse groups of travellers. It was also used, as much as possible, to assess the Agency’s effectiveness in identifying and mitigating risk in the travellers stream. This evaluation identifies gaps in the information needed to further support the Agency’s efforts toward fully integrating GBA+ into its programs, policies, and operations.

The evaluation employed a mixed-method approach, using four data collection methods to support the conduct of qualitative and quantitative data analyses. It also leveraged various groups of subject matter experts to validate data and findings. The data collection methods included:

- A review of internal documents
- An analysis of operational data from COGNOS, Secondary Processing and Passage History (SPPH),³ Integrated Customs Enforcement System (ICES), and NTC scenario-based targeting (SBT) and flight list targeting (FLT) tracking
- Multiple semi-structured interviews with internal stakeholders
- A survey of Border Services Officers (BSOs), Superintendents, and NTC Targeting Officers, working in the travellers stream within the last two years

The evaluation could not conduct comprehensive GBA+ of the travellers continuum due to inconsistency in the collection and management of operational data. It mitigated many challenges by focusing the analysis of operational data in the Air mode to ensure a complete analysis of travellers program activities. Discussions with subject matter experts helped facilitate accurate interpretations of operational data and to contextualize this information with known data challenges/quality issues.⁴

As a result of these challenges, the evaluation focused on certain GBA+ factors:

³ SPPH comprises two different applications: Secondary Processing, which is used to process referrals; and Passage History, which stores the passage history record including referral results.

⁴ Refer to Appendix E for more details on evaluation methodology and limitations.

Table 2: GBA+ indicators explored by the evaluation

What the evaluation could explore	What the evaluation could not explore (examples only)
<ul style="list-style-type: none"> • Gender⁵: Focused on male and female gender categories, as data does not fully account for non-binary gender identities • Socio-economic status: Classified travellers, based on their citizenship, into continent groups and World Bank income groupings, to facilitate socio-economic analyses • Race or ethnicity to a limited extent: Analysis based on travellers' race or ethnicity was limited due to lack of consistent, accurate, appropriate, and/or self-identified data on these two identity factors. • Departure country⁶: e.g. to measure effectiveness 	<ul style="list-style-type: none"> • Age: Comprehensive analysis could not be undertaken due to inconsistency and format of data on this factor across multiple databases • Country of birth: Not available consistently throughout continuum • Disability: No quantitative or qualitative data • Language: No quantitative data and limited qualitative data • Religion: No quantitative and minimal qualitative data

1.5 Background: GBA+ at the CBSA

What is GBA+?

GBA+ is an analytical process used to assess how diverse groups of people may experience policies, programs, and initiatives. It considers many identity factors, such as gender, race, ethnicity, religion, age, and mental or physical disability.

The Government of Canada has sustained its commitment to GBA+ in the development of policies, programs, and legislation since 1995. In the January 15, 2021 Letter to the Minister of Public Safety and Emergency Preparedness (PSEP), the Prime Minister of Canada discussed the importance of “evidence-based decision-making that takes into consideration the impacts of policies on all Canadians and fully defends the *Canadian Charter of Rights and Freedoms*.” It further directs the Minister of PSEP to “consider public policies through an intersectional lens in order to address systemic inequities including: systemic racism; unconscious bias; gender-based discrimination; barriers for persons with disabilities; discrimination against LGBTQ2+ communities; and inequities faced by all vulnerable populations.”

⁵ The evaluation refers to “gender,” in alignment with guidance on Modernizing the Government of Canada’s Sex and Gender Information Practices and the Treasury Board Policy Direction to Modernize the Government of Canada’s Sex and Gender Information Practices. A traveller’s lived gender may not always match their identity documents, such as their passport. Countries such as Canada have begun implementing travel and identity document standards, which include additional gender identifier options to reflect diverse gender identities and have processes in place through which a traveller can change the gender identifier on their identity documents.

⁶ Departure country refers to the first country from which an incoming traveller to Canada has departed.

The letter also outlined the need to:

- whenever possible, work to improve the quality and availability of disaggregated data to ensure that policy decisions benefit all communities;
- take action to address systemic inequities in law enforcement; and
- introduce and bring into force legislation to create a review body for the CBSA, including measures to ensure that complaints and reports are responded to promptly.

What are the benefits of GBA+ in the CBSA context?

Canadians, people living in Canada, and people visiting Canada may have different experiences when it comes to law enforcement and, by extension, border security and management. Biases and assumptions can affect law enforcement and national security organizations' relationships with diverse communities, which are fundamental to keeping Canadians safe.⁷

The CBSA, as a member of the Public Safety Portfolio, has engaged in sessions, which support Public Safety's ongoing work to enhance bias sensitivity, improve cultural competency, and better understand how intersecting identity factors can be considered in national security policies, programs, and operations. The Government of Canada's national security community has set objectives to increase its awareness and address potential biases. This includes understanding bias sensitivity, diversity, and identity considerations, and using GBA+ in all areas related to national security.

The rigorous and systematic application of intersectional analysis tools, such as GBA+, helps to identify, reduce, and prevent inequality. Bias-sensitive decision-making aims to:

- Enhance accountability to Canadians and the travelling public
- Enable the identification of risk
- Improve responses to security threats

How has GBA+ been integrated at the CBSA?

In FY 2018-2019, GBA+ became the subject of its own Supplementary Information Table in the CBSA's Departmental Plan. At that time, the CBSA committed to make GBA+ an integral part of its policies, programs, and initiatives to improve decision-making and achieve better results for clients, stakeholders, and all Canadians. To fulfill this objective, the Agency nominated a GBA+ Champion, and established a GBA+ Centre of Responsibility and GBA+ Internal Working Group.

From FY 2018-2019 to FY 2019-2021, the CBSA included several planned and ongoing GBA+ related initiatives in the Departmental Plan:

- Modernizing Sex and Gender Information Practices

⁷ Source: Public Safety Canada. "Enhancing Bias Sensitivity, Diversity and Identity in National Security" <https://www.publicsafety.gc.ca/cnt/ntnl-scr/dvrsty/index-en.aspx>.

- Identified 18 CBSA initiatives as requiring attention to comply with the Treasury Board Policy Direction (e.g. forms, applications, client interactions)
- Explore internal training needs and horizontal training opportunities
- Increased understanding of the value of GBA+ in decision-making, data collection, and reporting
- Challenge assumptions and increase sensitivity to existing and potential biases
- Established an Agency-wide Task Force on anti-racism that will develop training alongside the Customs and Immigration Union and HRB (including de-escalation training for frontline personnel)

Gender-disaggregated data and other socioeconomic data and indicators are a key component of GBA+. However, in the FY 2020-2021 CBSA Departmental Plan, the Agency reported that it does not maintain an inventory of programs that collect and keep individual recipient microdata information to undertake GBA+, and that it did not anticipate providing any GBA+ related data in public reports for FY 2020-2021. Further, it is difficult to extract and consistently record gender-disaggregated and other data contained in the CBSA's databases and reporting instruments.

1.6 Background: GBA+ in the travellers continuum

Based on public opinion research (focus groups and surveys) commissioned by the Communications Directorate, Canadian travellers are, in general, satisfied with border processing and their experience at the border. For example, 96% of respondents rate their experience with a BSO as very positive or somewhat positive. However, some concerns were raised.

Based on an analysis of complaints received from June 2016 to June 2018 by the air mode, references to certain identity factors included language, age, disability, physical or mental health, race, ethnicity, or ethnic/national origin. Complaints were largely related to disrespectful treatment by frontline personnel or inequities resulting from airport procedures (e.g. waiting in line for a kiosk or a BSO). These complaints were mirrored in a number of news media articles in 2020.⁸

2. Assessment of the travellers continuum through a GBA+ lens

According to the CBSA performance measurement framework, outcomes related to the travellers continuum activities and outputs can be divided into two main categories:

1. Travellers processing
2. Risk identification and mitigation

⁸ Refer to Appendix E for more information on this method.

2.1 Travellers processing through GBA+ lens

2.1.1 Gender

The evaluation examined the impact of traveller processing based on gender. Overall, the evaluation results did not indicate that [*] travellers were disproportionately referred or searched; [*] travellers were more likely to be selectively referred for a customs examination in the air mode.

Due to data limitations and system integration challenges, the Agency is currently not equipped to assess the impacts of these activities on smaller subpopulations.

A note on data disaggregated by gender: Across the travellers continuum, data is not consistently recorded to allow for a comprehensive GBA+ by travellers' gender through all stages of traveller processing. For example, the NTC does not actively record gender for the targets that are issued. Therefore, evaluators were unable to assess the impact of targeting on travellers based on gender.

Between FY 2014-2015 and FY 2020-2021,⁹ [*] of scenarios used by the NTC to risk assess incoming travellers specified a gender category of male [*], female [*], or male and female [*]. The majority of scenarios that specified a gender category were related to national security concerns, with [*] of all national security targets issued being based on a scenario specifying a [*] gender category. According to NTC subject matter experts, this trend may have been the result of increased risk of illicit migration, as well as the threats posed by serious transnational organized crime groups, [*].

However, in response to a survey conducted as part of the evaluation, [*] NTC Targeting Officer respondents reported that a traveller's gender was "not at all important," as a risk indicator when deciding to issue a target for contraband. Additionally, [*] targets issued for contraband were based on scenarios that did not specify a gender category. Furthermore, NTC officers generally do not input the gender variable contained in certain scenarios into the ICES when issuing a target. The intent is to improve the likelihood that the target will result in a match. However, this process makes it difficult to assess the impacts of scenarios by travellers' gender. As certain GBA+ factors, such as gender, are not recorded in the NTC's target tracking data set (for Scenario Based and Flight List targets), the Agency is unable to conduct a comprehensive GBA+ of the NTC's targeting activities.

⁹ Source: Scenario Performance data FY 2014-15 to FY 2020-21 (July 2020)

In addition to targeting, once a traveller arrives into Canada, a frontline officer may refer a traveller for secondary examination. The overall referral rate (for all referral subjects, types, and sources) in the air mode was [*] to the gender distribution of incoming travellers. However, this trend was not consistent across all continents. For example, while there was a higher proportion of [*] travellers coming to Canada by air from [*], the referral rate was [*] from these continents (refer to Table 3).

Table 3: Continents (based on citizenship) that have [*] of [*] and [*] for [*] travellers

Continent of citizenship	% Total air travel volume	Referral rate ¹⁰
[*]	[*]	[*]
Female	[*]	[*]
Male	[*]	[*]
[*]	[*]	[*]
Female	[*]	[*]
Male	[*]	[*]

Source: COGNOS Passages, FY 2015-16 to 2020-21.

When analyzing only selective referrals for customs examination, by referral source, [*] proportion of [*] travellers were also selectively referred for customs examination by PIL Officers. Customs referrals from other sources, such as Roving Officers, also presented [*] distribution of selective referrals of [*] travellers. For example, referrals by Roving Officers [*]. [*] travellers were also more likely to be the subject of a more intrusive search when compared to [*].

[*] of frontline evaluation survey respondents [*] indicated that gender identity or expression are not at all important as risk indicators when deciding to refer a traveller to secondary for customs-related concerns. However, interviews with program representatives revealed that [*] travellers are believed to be [*]. While decisions are based on a combination of experience, enforcement trends, training, and other sources of information, the trends presented here should be examined further, as the resultant rate of male and female travellers are [*]

[*] to the distribution of incoming passage volumes and the risk factors associated with [*] travellers being used by the NTC and BSOs to identify travellers for secondary examinations.

2.1.2 Socioeconomic status

The economic status of a traveller is not a data element that is tracked or recorded in CBSA databases. However, using the World Bank model for Income Groupings, the evaluation was able to broadly categorize travellers from countries of high, upper middle, lower middle, and

¹⁰ Referral rates include all referral subjects (immigration vs. customs), types (selective, mandatory, random), and sources.

low income groupings. For example, citizens from U.S and Canada would fall into the high income grouping. This enabled the comparative analysis of travellers from countries categorized by socioeconomic status. In general, travellers from [*] countries were [*].

However, these broad categories of socioeconomic status do not fully represent the characteristics of the travelling population of any given country. For example, a traveller coming from a country in the * socioeconomic grouping could still belong to a [*] income group. Therefore, without specific data on travellers' individual socioeconomic statuses, the analysis based on World Bank grouping is only indicative.

A note on data disaggregated by socioeconomic status (based on citizenship): The broad categories used to place travellers by citizenship into socioeconomic groupings do not fully represent the characteristics of the travelling population of any given country. For example, a traveller coming from a country in the [*] socioeconomic grouping could still belong to a [*] income group. Therefore, without specific data on travellers' individual socioeconomic statuses, the analysis based on World Bank grouping is only indicative.

Based on evaluation survey results, [*] of frontline respondents [*] reported that a traveller's perceived economic status is [*] as a risk indicator when deciding to refer a traveller for customs-related concerns. However, it is challenging to draw conclusions on whether respondents perceive the economic status of a traveller as a risk indicator. Based on open-text survey responses, the perceived economic status of a traveller may be considered in conjunction with other factors, [*].

When examining primary referral rates at the continent level, the evaluation results indicated that citizens of countries [*], which are in lower socioeconomic classifications, [*].

Table 4: Referral rate by continent (based on citizenship)

Citizenship by continent	% Total air travel volume	Referral rate ¹¹
Africa	[*]	[*]
Asia	[*]	[*]
South America	[*]	[*]
North America (excluding Canada from the % of total air travel volume and referral rate)	[*]	[*]
Europe	[*]	[*]
Oceania	[*]	[*]

Source: COGNOS Passages, FY 2015-16 to 2020-21.

¹¹ Referral rates include all referral subjects (immigration vs. customs), types (selective, mandatory, random), and sources.

Further assessment of the countries within these continents reinforced these trends. When exploring the primary and secondary processing activities of frontline personnel at the border, evaluation results revealed that citizens of countries in [*] socioeconomic classifications [*], when compared to incoming passage volumes. [*]

For example, between FY 2018-2019 and FY 2020-2021,¹² citizens of [*] had a resultant rate of less than one percent. However, the referral rate of citizens of [*]

One of the possible explanations for the [*] referral rate might be a [*] level of concern over the risk posed by travelling [*] citizens (e.g. immigration related issues, such as visa requirements and [*] concerns). However, when compared to [*] citizens, which account for a relatively similar percentage of total passages and may present a similar level of border-related risk, citizens of [*] were [*] referred for secondary examination. It is unclear why citizens of [*] were [*] referred for secondary examinations and to such a degree.

When assessing NTC practices, [*] listed in combination with other factors when the NTC issues a target. Between FY 2014-2015 and FY 2020-2021, [*] of NTC scenarios specified [*] while [*] specified [*], and [*]

In comparing NTC Scenario Based Targeting (SBT) and Flight List Targeting (FLT) practices between FY 2015-2016 and FY 2019-2020,¹³ both targeting activities demonstrated similar trends. Namely, citizens of certain countries are [*] targeted in comparison with incoming passage volumes.

[*] NTC targeting rates of citizens of specific countries appeared to be partly explained by the resultant rates generated by targets [*] As illustrated below, citizens of [*] (which fall into the [*] grouping) comprise [*] of the traveller volume in the air mode and they comprise [*]. This appeared to be [*] in comparison to high income countries such as Canada and the U.S. [*] which may be due to higher immigration and other border related risks.

Note: In [*] Canada lifted the visa requirement for all [*] citizens. This may have contributed to [*], which can be observed when examining trends in immigration enforcement actions year over year.

Table 5: Document origin countries with the three highest numbers of SBT targets issued (FY 2015-16 to FY 2019-20)

	Target	Examined	Resultant	Passage by citizenship
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¹² This is not representative of the COVID-19 pandemic period and related trends.

¹³ For definitions of SBT and FLT practices, refer to Appendix B.

Document origin country	n	%	n	%	n	%	% of all passage
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2015-16 to FY 2019-20; CBSA internal program documents; and COGNOS IAPI Self-Service Reporting (Departure location country and Document origin country) FY 2016-17 to 2020-21.

If a high resultant rate is an indicator of risk and partially explains a higher targeting rate, [*] population.¹⁴ This difference in targeting rate between [*] and [*] citizens may warrant further analysis to determine if the variances can be explained by the level of risk and other policy considerations.

The evaluation also compared NTC targets and primary referrals, based on the distribution of targets and referrals by World Bank socioeconomic grouping. To do so, the evaluation isolated NTC targets issued for contraband (using Scenario Based Targeting and Flight List Targeting) and selective referrals for customs examination, issued by Roving Officers and Point Officers.¹⁵ This was compared with the overall incoming traveller population, by socioeconomic grouping.

Reminder: The resultant rate is only one metric that can be used to examine level of risk among a multiplicity of risk indicators. The value for duty (VFD) and/or quantity of each seizure, for example, were not the focus of this evaluation. As with resultant rates, these are also imperfect measure of risk. Refer to Appendix E for more details.

Table 6: Distribution of NTC contraband targets and selective customs referrals by World Bank income grouping in the air mode from FY 2017-2018 to FY 2019-2020 (using document origin country or citizenship)

Referral source	High income (H)	Upper middle income (UM)	Lower middle income (LM)	Low income (L)
Total passage volume	[*]	[*]	[*]	[*]
NTC	[*]	[*]	[*]	[*]
Point	[*]	[*]	[*]	[*]
Rover	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2017-18 to FY 2019-20; and COGNOS IAPI Self-Service Reporting FY 2017-18 to 2019-20; and COGNOS Referral Data, FY 2017-18 to 2019-2020.

[*]

¹⁵ PIL Officer referrals in the air mode were not included as part of this analysis, as it is difficult to determine the population of travellers, by citizenship and document origin country, that may engage with a PIL officer, due to the functionality and requirements of the Primary Inspection Kiosk (PIK). For example: The travelling population that uses PIK may not represent certain travellers that do not meet the requirements of using the Kiosk (e.g. machine readable passport) or cannot use the Kiosk. Further, PIL officers will most often only engage with travellers that are unable to use the kiosk.

Based on this analysis, the distribution of NTC targets issued for contraband more closely mirrored incoming passage volumes between FY 2017-2018 and FY 2019-2020, in comparison to referrals by Point and Roving Officers. In the referrals of citizens of [*] and [*] countries, Point Officer referrals were the most [*] when compared to incoming passage volumes. While these trends are affected by the unique reporting regulations, operating procedures, and volumes, they also indicate that, frontline travellers processing and frontline personnel should be the focus of future efforts to integrate GBA+ related training and intersectional analyses (such as GBA+), in the travellers stream.

This analysis demonstrates that while there is no specific direction to refer travellers solely based on their income level, there is consistent evidence to suggest that, generally, travellers [*] were examined [*] at the border when compared to incoming passage volumes. The Agency could do further analysis to examine how risk analysis and assessment practices contribute to this trend.

2.1.3 Race or ethnicity

Based on document and literature review, it is widely recognized that conducting research on discrimination based on race or ethnicity is difficult. Many national statistical agencies do not collect information on race or ethnicity for social and statistical/research reasons (e.g. France, Denmark, and Germany prohibit collection of data on race or ethnicity). Only Canada, the UK, the U.S., and Colombia have official data collection mandates and legal definitions alluding to race or ethnicity. Further, Canada's definition of visible minority groups, under the *Employment Equity Act*, has come under scrutiny by the United Nations.

According to the Ontario Human Rights Commission, “the process of social construction of race is called racialization: ‘the process by which societies construct races as real, different and unequal in ways that matter to economic, political and social life.’ Recognizing that race is a social construct, the Commission describes people as ‘racialized person’ or ‘racialized group’ instead of the more outdated and inaccurate terms ‘racial minority,’ ‘visible minority,’ ‘person of colour,’ or ‘non-White’.”¹⁶

Literature that sought evidence of profiling practices in law enforcement was often based on surveys of the general population. These surveys asked respondents if they felt they had been the victims of profiling. While some studies used proxy measures, others explained why proxies (e.g. citizenship or country of birth) are problematic for determining ethnicity and race, as they do not account for the diversity of a country's population (e.g. as a result of global trends in

¹⁶ Source: Ontario Human Rights Commission, Racial discrimination, race and racism (fact sheet), <http://www.ohrc.on.ca/en/racial-discrimination-race-and-racism-fact-sheet>.

migration). For this reason, the use of this methodology was limited and citizenship was only viewed as a general indication of a traveller's race, ethnicity, or ethnic/cultural origin. Furthermore, it is important to note that the racial/ethnic/cultural composition of a country, based on its reported census data, may not always be a direct indication of the composition of those travelling to Canada in the air mode.

The CBSA's traveller processing activities, such as NTC targeting, do not intentionally set out to target travellers based on perceptions around their race or ethnicity. In its Scenario Based Targeting, for example, the NTC uses a combination of information sources, such as global trends and reports (e.g. World Customs Organization drug trend reports), in the development of scenarios, which are systematically reviewed for Human Rights and other considerations.

However, certain practices can have unintended consequences that result in the overrepresentation of racialized communities in the law enforcement context. For example, when targeting rates are higher for certain origin countries (largely representative of a traveller's citizenship), there could be unintended consequences for travellers of certain racial/ethnic groups when those groups make up a larger proportion of incoming travellers from those countries.

The examples used in this section were selected based on citizenship groups referenced and explored in other areas of the evaluation. A United Nations (UN) world census database¹⁷ that contains aggregated datasets of national, racial and/or ethnic groups in each country was also used to support the analysis. For example, according to the UN world census data, citizens of [*] may be considered as belonging to a racialized group.

When keeping target type and departure country constant, contraband targets¹⁸ issued on flights departing [*], by citizenship, were proportional to incoming passage volumes. This indicates that citizenship was not a defining factor in issuing contraband targets for travellers departing [*].

The table below illustrates that citizens of [*], when targeted using SBT, were targeted proportionally when compared to incoming passage volumes. In contrast, citizens of the [*] on incoming flights from [*] were not issued targets proportionally when compared to their incoming passage volumes. However, this analysis does not account for the cultural diversity of [*] travellers on those flights, as there is no further demographic information available for these travellers.

¹⁷ Source: United Nations Data File, World Census Data, 2013 <http://data.un.org/Data.aspx?d=POP&f=tableCode:26>.

¹⁸ Targets issued may have indirect and direct resultants. For example, an indirect resultant might occur when a contraband target has a resulting enforcement action for illicit migration or national security.

Table 7: SBT contraband targets issued for flights departing [*] from FY 2015-2016 to FY 2019-2020 19

First country of departure	[*]						
Document origin	Targets	% of targets	Examined	Examination rate	Resultant	Resultant rate	% Incoming passages
Canada	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2015-16 to FY 2019-20; CBSA internal program documents; and COGNOS IAPI Self-Service Reporting (Departure location country and Document origin country) FY 2016-17 to 2020-21.

Similar to trends in SBT data, FLT contraband targets issued for travellers on flights departing [*] were generally proportionate to incoming passage volumes, when examining targets by travellers' citizenship (refer to Table 8). Similarly, this does not account for diverse sub-populations of travellers within and across these citizenship groups.

Table 8: FLT contraband targets issued for flights departing [*]

First country of departure	[*]						
Document origin	Target	% of contraband targets	Examined	Examination rate	Resultant	Resultant rate	% Incoming passages ²⁰
Canada	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2015-16 to FY 2019-20; CBSA internal program documents; and COGNOS IAPI Self-Service Reporting (Departure location country and Document origin country) FY 2016-17 to 2020-21.

Based on this preliminary analysis, on flights departing from [*] there is no indication that citizens of [*], who may belong to a racialized group, were disproportionately targeted by the CBSA's NTC for contraband.

¹⁹ According to NTC representatives, the NTC continues to refine its practices and has deactivated a number of scenarios that cite [*] as a departure country.

²⁰ Does not account for [*] (departure country: [*]) of "missing" document origin values in the data set.

With consideration for the associated limitations, the above methodology could be replicated for other citizenship groups, which may comprise larger proportions of persons belonging to racialized groups, to indicate if there are potential issues requiring further assessment.

It is also important to note that the CBSA currently collects data on travellers' perceived race for searches and arrests. This information is collected to identify individuals without access to and the use of biometric data. It is not collected for analytical or risk assessment purposes. In ICES, a description of a traveller's perceived race may be entered following a search, using a drop-down list. Further, Enterprise Information Data Architecture has not included racial descriptions as an attribute within the Agency Collaborative Platform (ACP), explaining that the lack of defined business requirements for capturing and using information on race could not be satisfied by other data attributes. Relevant branches within the CBSA are examining options to address the concerns raised over data accuracy, privacy, and consent.

Most frontline survey respondents were satisfied (to a very large extent or to a large extent) with the CBSA's efforts to prevent discrimination and eliminate barriers encountered by diverse groups of incoming travellers.²¹ However, in examining complaints information collected by the Agency's Recourse Directorate between June 2016 and June 2018, 11% (n=71) of complaints (633) in the air mode were related to reports of unfair or disrespectful treatment based on travellers' race, ethnicity, or ethnic/national origin. Additionally, a quarter (n=227) of frontline respondents (n=922) indicated that they had directly witnessed a colleague discriminate against a traveller in the past two years. Of these respondents, 71% (n=162) suggested the discrimination they witnessed was based, in full or in part, on the travellers' race and 76% (n=173) on the travellers' national or ethnic origin(s).

41% (n=94) of frontline survey respondents did not report what they observed

Based on open-text and close-ended survey responses, this was largely due to perceptions around Agency culture (e.g. fear of reprisal, perceptions that these instances can be defended through the use of a "multiplicity of risk indicators," and feeling uncomfortable). While 20% (n=11) of these respondents reported having spoken directly to the colleague involved in the incident, 31% (n=219) of all BSO respondents (n=720) indicated that they did not feel comfortable sharing their concerns with a person of authority.

16% (n=36) of frontline survey respondents reported what they observed

However, 39% of these respondents indicated that they faced challenges in doing so and, most commonly (n=9), their reports were not taken seriously or actioned.

At this time, the Agency can only conduct very limited analysis based on travellers' racial or ethnic identities when using operational data. If faced with public complaints or claims of racial

²¹ Of 922 frontline respondents, 32% (n=295) to a very large extent; 28% (n=258) to a large extent.

discrimination, the Agency can neither prove nor disprove with its data whether its policies or practices discriminate against travellers, due to the complexity of this issue. If the Agency were to attempt this type of analysis in the future, it would have to consider and develop new approaches on data collection, storage, and analysis.

2.1.4 Intersectional identities

Intersectionality refers to “the interconnected nature of social categorizations and identity factors...” as they apply to a given individual or group, which are “regarded as creating overlapping and interdependent systems of discrimination” or inequity.²² An intersectional lens is important for assessing the potential impacts of the Agency’s policies and practices on diverse subpopulations of travellers. Examining the CBSA’s operational data through travellers’ intersecting identity factors adds further complexity to GBA+. The following section examines the combination of citizenship, socioeconomic status, and gender identities within the context of travellers processing.

The evaluation results indicated that [*] travellers, particularly citizens of [*] income or [*] income countries, were [*] referred when compared to incoming passage volumes and [*] travellers of the same citizenship groups. [*] travellers from certain [*] countries were [*] to be referred when compared to [*] travellers from [*] countries. The Agency may need to further assess whether this degree of difference is considered within an “acceptable” range.

Table 9: Referral rates by income group (based on citizenship) and gender

Income group based on World Bank model	% Total air travel volume	Referral rate ²³
High income (H) female	[*]	[*]
High income (H) male	[*]	[*]
Upper middle income (UM) female	[*]	[*]
Upper middle income (UM) male	[*]	[*]
Lower middle income (LM) female	[*]	[*]
Lower middle income (LM) male	[*]	[*]
Low income (L) female	[*]	[*]
Low income (L) male	[*]	[*]

Source: COGNOS Passages, FY 2015-16 to 2020-21.

The availability of traveller demographic information across the travellers continuum limited the extent and depth of intersectional analysis that could be completed. For example, the Agency does not collect information on diverse gender identities. Operational data on the gender identities of travellers is categorized in four ways: male, female, unspecified, and

²² Source: Oxford English Dictionary, “Intersectionality,” <https://www.oed.com/view/Entry/429843>.

²³ Referral rates include all referral subjects (immigration vs. customs), types (selective, mandatory, random), and sources.

unknown.²⁴ A traveller with a gender neutral passport may be categorized as “gender unspecified,” but this category may not be unique to persons with gender neutral travel documentation. Nonetheless, it is recognized that border processing may be experienced differently, and may disadvantage those with diverse gender identities.

As part of its modernization efforts, the Agency has created a new resource responsible for developing an Agency-wide data analytics strategy. This includes foundational pieces aligned with all stakeholders and partners, as well as enhancing access to information for Canadians while protecting the personal information of Canadians. As this function matures, the CBSA anticipates being able to provide more consolidated data reports in the future.

In summary, GBA+ can require significant amounts of demographic data or an analysis that goes beyond the use of operational and quantitative data, particularly when attempting to assess the potential disproportionate impacts of programs, policies, and practices on smaller subpopulations of travellers.

2.2 Effectiveness: Risk identification and mitigation

GBA+ can be useful in providing information on the effectiveness of travellers processing, and can identify gaps and opportunities to improve risk identification and management through bias sensitive decision-making.

When examining targeting rates by departure countries (i.e. flights from certain countries), certain countries, such as [*], appeared to be supported by the high number of resultants generated. However, other countries like [*] had a disproportionately high number of targets issued, [*] (refer to Table 10).

Table 10: Overall SBT targets issued between FY 2015-2016 and FY 2019-2020 based on countries of departure

First country of departure	Target		Examined		Resultant		Passages by departure country
	n	%	n	%	n	%	% of all passages
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2015-16 to FY 2019-20; COGNOS IAPI Self-Service Reporting (Departure location country) FY 2016-17 to 2020-21.

²⁴ Due to data capture and data quality issues, it is unclear which travellers comprise these categories. However, persons with Gender X or gender neutral documentation may fall into these categories.

When exploring trends in targets issued for contraband (Table 11), the highest number of targets issued were for travellers departing [*] despite comprising approximately 1% of incoming passages by departure country and a resultant rate of 3% (compared with an overall contraband target resultant rate of 6%). Contraband targets issued for travellers departing [*] had the highest overall resultant rate (52%), while representing only 5% of targets issued.

Table 11: SBT contraband targets issued between FY 2015-2016 and FY 2019-2020 based on countries of departure

First country of departure	Target		Examined		Resultant		Passage by departure country
	n	%	n	%	n	%	% of all passages
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2015-16 to FY 2019-20; CBSA internal program documents; and COGNOS IAPI Self-Service Reporting (Departure location country and Document origin country) FY 2016-17 to 2020-21.

In summary, it appears that [*] flights were targeted more frequently in both overall targets and contraband targets, despite the lower resultant rates. The NTC should consider re-examining its current approach to shift its focus from [*] flights to other higher risk flights from other countries.

The analysis of targets issued for contraband using travellers' citizenship (document origin country) and departure country can also support efforts to improve the effectiveness of risk assessment and identification in the travellers stream. For example, while [*] citizens on flights from [*] had high resultant rates, targets issued for these travellers were disproportionately low (Table 12).²⁵ The NTC could examine why it maintains a higher resultant rate in issuing targets to [*] citizens on flights from [*], while the targets issued to other citizens from other countries on the same flights, particularly those issued to [*] yield fewer results.

Table 12: FLT contraband targets issued for U.S. citizens are disproportionately low for flights from [*] compared to other citizenships

First country of departure	[*]						
Document origin	Target	% of contraband targets	Examined	Examination rate	Resultant	Resultant rate	% Incoming passages ²⁶

²⁵ Note: The value for duty (VFD)/quantity of seizures, resulting from a target, was not the focus of this evaluation.

²⁶ Does not account for [*] (departure country: [*]) "missing" document origin values in the data set.

Canada	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]
[*]	[*]	[*]	[*]	[*]	[*]	[*]	[*]

Source: Accumulated Tracking Sheets FY 2015-16 to FY 2019-20; CBSA internal program documents; and COGNOS IAPI Self-Service Reporting (Departure location country and Document origin country) FY 2016-17 to 2020-21.

As demonstrated above, GBA+ can provide insights to program management on areas that warrant further assessment to improve overall program performance in the areas of risk assessment and identification.

3. Contributing factors

Seemingly neutral rules, standards, policies, practices or requirements are sometimes put in place without considering the unique needs or circumstances of diverse groups. This may have an adverse or discriminatory effect. The multiple risk indicators used to identify potential high-risk travellers could have unintended consequences on various diverse groups.

Several factors can contribute to how travellers are processed at the border, including the Agency's policies, procedures, and guidance for frontline personnel and NTC targeting officers, their awareness of these materials and the training that they receive. The Agency's culture may also affect the overall acceptance, appreciation, and adoption of GBA+ in everyday work practices, according to a survey of frontline personnel (i.e. BSOs and Superintendents) and NTC Targeting Officers.

The viewpoints of evaluation survey respondents on the future direction of GBA+ at the CBSA were largely polarized in end-of-survey, open-text responses (n=97). For example, 41% (n=40) of respondents emphasized the need for more Agency support and emphasis on issues, such as equity, diversity, and inclusion (including: mandatory, in-person training). This was viewed as an important measure to ensure a common understanding of the importance of putting into context the behaviours of travellers for negating risk and treating travellers equitably. In contrast, 31% (n=30) of respondents expressed the opinion that this focus is not valuable or needed (e.g. that it is too political) and may, in fact, hinder their performance of the Agency's law enforcement functions.

The following section focuses on evidence from the survey and document review, and suggests areas of concern that the Agency should investigate further.

3.1 GBA+ related training and awareness

In 2019, the Training and Learning Solutions Division launched the GBA+ Strategy, which included:

- Efforts to increase awareness amongst CBSA employees of Women and Gender Equality Canada (WAGE) GBA+ training; and
- The development of tools to facilitate integration of GBA+ in future training and learning solutions.

The Agency also launched the CBSA Positive Space course in 2019, to familiarise officer trainees with gender identity issues as they deliver services to the public. However, this course is not yet mandatory. Of the relevant mandatory courses, no course is specifically related to GBA+, gender diversity, or cultural awareness. The only exception is the Akwesasne Cultural Awareness Training, which is mandatory for all CBSA staff at the Cornwall port of entry.

Overall, frontline personnel reported positive outcomes from the GBA+ related training²⁷ that they completed. For example, 60% (n=553) of frontline respondents (922) reported that as a result of their GBA+ related training, they felt more comfortable performing their duties when interacting with travellers from diverse backgrounds. However, only 11% of respondents reported having completed the “Introduction to GBA+” course provided by WAGE. On average, participation in non-mandatory GBA+ related courses was noticeably lower (19%) than in the three mandatory courses (68%). When explaining why they did not complete certain training courses, 80% (n=727) of respondents indicated that they were “not aware of the course(s).”

Overall, survey respondents were satisfied with coverage on GBA+ related subject areas.²⁸ However, 46% (n=430) of frontline respondents (n=922) were not at all satisfied or satisfied to a small extent with coverage on engaging with travellers experiencing mental illness or displaying mental health concerns. The self-guided, online format of many courses was viewed unfavourably. Some of the comments suggested that it is not suited to the seriousness of the subject matter. Others considered that the format was not accessible or suitable to all learners and learning styles.

²⁷ Herein, GBA+ related training refers to courses, offered internally and externally, that are related to implicit bias and bias sensitivity, diversity and identity, anti-racism, or engaging with travellers experiencing mental illness or displaying mental health concerns. A full list of the training courses referenced in the evaluation survey can be found in Appendix F.

²⁸ Of 942 survey respondents, 39% (n=371) were satisfied with coverage on implicit bias and bias sensitivity; 49% (n=461) were satisfied with coverage on diversity and identity; and 50% (n=469) were satisfied with coverage on anti-racism.

3.2 Policy awareness and communication

55% of frontline survey respondents (n=922) reported that they had not observed any adverse or discriminatory effects on travellers resulting from the Agency's rules, standards, policies, practices, or requirements. However, many key guidance documents (e.g. CBSA Enforcement Manual, People Processing Manual) contain few or no GBA+ considerations and have not been recently or consistently updated.

Interview and survey data, as well as document review, suggested that CBSA policies related to personal searches may not provide sufficient or appropriate guidance to BSOs for conducting searches of travellers with diverse gender identities.

Example: Challenges can arise for transgender travellers when the gender recorded on certain travel or legal documents do not match. Permanent Residents (PR) of Canada, from countries that do not acknowledge transgender, non-binary, or intersex persons (e.g. Mexico, Jamaica, Uganda), may have discrepancies between the gender recorded on their PR card and their passport. A lack of guidance for frontline personnel on how to appropriately and respectfully respond to these scenarios may lead to confusion and misunderstanding and may negatively impact travellers.

The CBSA Enforcement Manual has not been revised with updated guidance and procedures regarding personal searches of transgender, non-binary, and/or intersex travellers. While Operational Bulletins on personal searches were issued in 2011 and 2020 as appendices to the CBSA Enforcement Manual, the bulletin issued in 2011 used terms which may be considered outdated and inappropriate.²⁹

Some updates have been made to policy guidance in the travellers stream. The CBSA People Processing Manual provides frontline personnel with unique considerations that require them to adopt a process of communication and interaction adapted to the situation:

- Awareness considerations (e.g. a person's culture)
- Directive that prohibits all forms of discrimination under the *Canadian Human Rights Act*, including racial profiling
- Guidelines on effective communication
- Regulations and requirements regarding the services that are provided to travellers with disabilities

90% (n=851) of all survey respondents (n=942) reported that they agreed or somewhat agreed that in order to do their jobs effectively, they need to recognize their personal and implicit biases (i.e. biases which can operate outside of a person's awareness and can be in direct contradiction to a person's beliefs and values, unconsciously affecting their behaviour). This may suggest that the Agency's efforts to integrate GBA+ into its guidance materials contributed

²⁹ The term "transsexual" is considered to be outdated and inappropriate.

to respondents' awareness of the importance of understanding one's own biases when engaging with travellers.

The Agency may need to further explore the effectiveness and potential impacts of frontline personnel relying on non-verbal indicators, given the importance of risk negation with an understanding of travellers' diverse socio-cultural backgrounds. Despite the guidance in the People Processing Manual referenced above, 64% (n=593) of frontline respondents (n=922) agreed or somewhat agreed that observing non-verbal cues can be used to determine if someone is lying, regardless of their background. Further, 40% (n=140) of open-text survey responses indicated that using non-verbal indicators such as [*] are "extremely important" or "moderately important" as risk indicators when deciding to refer a traveller to customs secondary.

4. Data challenges

The Agency does not currently have a comprehensive integration of data across the travellers continuum, which limited the evaluation in conducting a complete GBA+ assessment. The Agency collects operational data at various points in the continuum, e.g. API/PNR pre-arrival data, passage data when travellers arrive at the port of entry, and (when applicable) secondary and enforcement data. [*] because the demographic data of travellers is kept separately in various operational systems and databases.³⁰

Example: There is [*] (where a traveller is referred and examined) and data on enforcement actions (e.g. results, search and arrests and AAMPS). This makes it difficult to calculate a resultant rate based on demographic GBA+ factors.

Performance of risk identification activities in the travellers program are partially measurable with existing performance indicators set by the Travellers Branch and Intelligence and Enforcement Branch. However, there are currently several challenges associated with using these metrics as part of a GBA+. For example, risk identification based on a resultant rate cannot be disaggregated by the demographic characteristics of the incoming traveller population.

The Agency has initiatives, which will address existing data challenges in the future, including the introduction of Information Business Architecture as a cornerstone for new IT and system development projects. Also, wider deployment of Master Data Management (MDM), currently being used in the Entry and Exit program, will be able to assign a unique identifier for each traveller [*]. Once these have been widely adopted and implemented, GBA+ can be conducted on an ongoing basis with relative ease. The Agency will be able to optimize its travellers processing activities to balance facilitation and compliance.

³⁰ Though not within the scope of this evaluation, subject matter experts suggests that similar data challenges may be encountered in the immigration context.

5. Conclusion

The CBSA has undertaken efforts to integrate GBA+ considerations within the travellers stream, in support of Government of Canada policy initiatives and commitments.

However, as stated in the 2020-21 Departmental Plan, the CBSA does not maintain an inventory of its programs that collect and keep individual client microdata information to undertake GBA+. The CBSA does not currently measure any travellers stream performance metrics through a GBA+ lens and does not have the reporting or data capacity to do so. This leads to challenges in verifying how travellers are impacted, and in assessing program effectiveness, along the GBA+ lines.

Note: While a number of GBA+ identity factors could not be explored by this evaluation, it is important that the CBSA consider these identity factors when addressing the evaluation recommendations to account for the diversity of the travelling public.

This evaluation experienced challenges associated with operational data collection and entry, retention, availability, consistency, and traceability. The evaluation's attempt to complete a GBA+ of the travellers stream demonstrated the complexities associated with GBA+ as an intersectional analysis tool. In the absence of complete and comprehensive datasets, this evaluation attempted to identify areas of potential concern, through GBA+, in travellers processing.

At the national level, [*] travellers are more likely to be referred and examined than [*] travellers. This is consistent with the belief (based on a combination of experience, training, enforcement trends, and other information sources) [*]. This belief and practice should be further reviewed, through the use of random examinations and analysis of examination results, to determine whether certain improvements are needed.

Travellers from lower socioeconomic countries are [*] referred and examined when compared to incoming passage volumes. While the CBSA does not rely on a single factor to risk assess incoming travellers, this observation suggests that the Agency should further examine if this is an unintended consequence of current policy and practice, and whether changes are required.

As for racial and ethnicity considerations, when using citizenship as a proxy, this evaluation's operational data did not indicate that citizens of [*] (who may belong to a racialized community) were targeted for secondary examination more frequently than other citizenship groups. However, the use of proxy measures can be problematic for determining ethnicity and race, as they do not account for the diversity of a country's population (e.g. as a result of global trends in migration). Broader policy and privacy considerations are required to determine how and if the Agency should attempt to identify (e.g. self identification), record, and retain data on a traveller's race of ethnicity.

Finally, this evaluation reveals that GBA+ can support program management to improve program effectiveness by analyzing program performance through the GBA+ lens.

To further explore GBA+ in the travellers stream, the Agency needs to:

- Explore opportunities for GBA+ by reconciling existing demographic data within the Agency’s operational systems (e.g. PAXIS, SPPH, ICES)
- Reduce reliance on manually-collected data sources (e.g. ORA and NTC target tracking³¹) for long-term reporting needs
- Assess the benefit and need (e.g. operational versus analytical) for collecting or retaining (e.g. API/PNR data) new or additional demographic information on incoming travellers, with cognizance of data principles and privacy concerns

Based on the evaluation findings, four recommendations have been made in the following key areas:

1. Travellers Data Management (Recommendation 1 and 2)
2. GBA+ Related Training (Recommendation 3)
3. Travellers Policies, Practices, and Guidance (Recommendation 4)

5.1 Travellers data management

While the CBSA continues to strive to normalize GBA+ and integrate it in everyday work practices, the Agency does not currently measure travellers stream performance through a GBA+ lens. Data collection, management, and reporting challenges currently limit the Agency’s ability to undertake innovative and complex GBA+ using operational data. As a result, the evaluation team could not complete a comprehensive GBA+ of the travellers continuum, across all modes.

These challenges can be divided into two main categories:

1. Data collection
2. Data management and reporting

Data collection

- Manual data collection, entry, and monitoring requires high level of effort to capture the desired elements and can result in data quality issues
- The Agency does not always capture the “right” data in a consistent way
- Lack of standardization in how certain data elements are defined (business versus IT definitions)

³¹ The NTC has identified deficiencies in tracking and reporting and, while not yet implemented, have made attempts to develop plans to introduce more automated tracking and reporting processes.

Data management and reporting

- Lack of fully integrated Agency and Travellers Program data
- CBSA IT systems designed in silos and, as a result, it is difficult to reconcile and draw linkages between the information collected
- Agency has not yet adopted a systems-wide, unique identifier that can be used to link traveller data across all relevant IT systems

The Travellers Branch is working with the Enterprise Architecture Division (EAD) to identify and map business and information requirements through the Agency Collaboration Platform. According to the EAD, the TB is at an advanced stage in identifying their business requirements. The Intelligence and Enforcement Branch (IEB), in contrast, would benefit from adopting a similar approach to business requirement definition and mapping to support future efforts.

Recommendation 1: The Vice-President (VP) of Strategic Policy Branch should, in collaboration with the VP of Travellers Branch, VP of Intelligence and Enforcement Branch, VP of Commercial and Trade Branch (i.e. Indigenous Affairs Secretariat), VP of Chief Transformation Officer Branch, and VP of Finance and Corporate Management Branch (i.e. Recourse Directorate, CBSA Complaints), formally define the objectives, methodology, and priority areas for data collection, retention, management, and analysis to better support GBA+ in the travellers stream.

Recommendation 2: The VP of Travellers Branch should, in consultation with key branches, develop and seek Executive Committee-level approval of a plan, with implementation timelines and change management strategies, to support the future use and integration of GBA+ in the travellers stream and to leverage the results for improvements in travellers processing.

5.2 GBA+ related training and awareness

There is a need to address gaps in current mandatory training for personnel in the travellers stream and to increase participation in GBA+ related courses, to ensure a common awareness and understanding of the value of GBA+ amongst those responsible for the development of policy and guidance materials, as well as those responsible for frontline operations.³²

This is also critical in addressing concerns regarding Agency culture and in identifying ways to support frontline personnel in the performance of their duties, while improving communication on the role of GBA+, diversity and identity, and anti-racism in an operational, law enforcement context.

³² For example, the Indigenous Training Program, under the Human Resources Branch, is currently planning the integration of related indigenous content into the Officer Induction Training Program.

Recommendation 3: The VP of the Travellers Branch should, in collaboration with key branches, make the “Processing of Indigenous Travellers and their Sacred Goods” and the “Positive Space at the CBSA” courses, as well as Unconscious Bias training, mandatory for frontline employees in the travellers stream and create a plan to raise awareness of GBA+ related courses (mandatory and non-mandatory) and resources within the public service among all travellers stream employees.

5.3 Travellers policies, practices and guidance

The Agency’s policies, practices, and guidance can have unintended consequences for diverse groups of travellers, particularly if they have not been developed and/or have not been reviewed through a GBA+ lens.

There is a need to include GBA+ considerations in the development of policy guidance.³³ Further, given concerns around a lack of reporting of incidents of discrimination toward travellers, there is a need to increase support for frontline personnel and management, and to increase awareness among travellers stream personnel of the potential inequities and barriers that may be encountered by diverse groups of travellers within the travellers continuum.³⁴

Recommendation 4: The VP of Travellers Branch should, in collaboration with the VP of Human Resources Branch and the VP of Chief Transformation Officer Branch, develop and implement a plan to improve the awareness and reporting of mistreatment and discrimination of travellers witnessed by CBSA personnel, without fear of reprisal.

³³ Following the conclusion of data collection for this evaluation, the CBSA has launched the CBSA Policy on the Agency’s Relationship with Indigenous Peoples. The CBSA Indigenous Affairs Secretariat has undertaken a policy review to apply an Indigenous lens and suggest changes in order to facilitate the Government of Canada’s promise of reconciliation with Indigenous Peoples in Canada and to implement the new CBSA policy.

³⁴ For example, how cultural awareness in behaviour, demeanour, facial expressions, and body language may influence traveller/BSO interactions.

Appendix A: Management response and action plan

RECOMMENDATION 1

The Vice-President (VP) of Strategic Policy Branch should, in collaboration with the VP of Travellers Branch, VP of Intelligence and Enforcement Branch, VP of Commercial and Trade Branch (i.e. Indigenous Affairs Secretariat), VP of Chief Transformation Officer Branch, and VP of Finance and Corporate Management Branch (i.e. Recourse Directorate, CBSA Complaints), formally define the objectives, methodology, and priority areas for data collection, retention, management, and analysis to better support GBA+ in the travellers stream.

Management response

The VP of Strategic Policy Branch (SPB) agrees with this recommendation and will work with all VPs mentioned to define the objectives, methodology, and priority areas for data collection, retention, management, and analysis to better support GBA+ in the travellers stream. Given that each of the recommendations in the evaluation are mutually supportive, it will be essential for all branches to collaborate on both the overarching guidance in this recommendation, as well as the specific activities to advance GBA+. For example, guidance on the collection of GBA+ data has implications for the future use and implementation of GBA+ in the travellers process as well as review and recourse. In addition, mandatory and non-mandatory training to raise awareness of GBA+ enables better data collection and GBA+ implementation.

Work is already underway by SPB on a series of work items, tools, resources, processes and approaches that will contribute to the improvement of data collection, retention, and management, and analysis to better support GBA+ in the travellers stream. Furthermore, it is working to ensure that data systems and processes of the future do not replicate the data issues of the past and that analytics drive a data driven modern border with GBA+ considerations. For example, the Chief Data Office (CDO) is working on a data reference, data catalogue and a data stewardship approach, which will improve the oversight of data quality and integrity, and ensure stewardship. It is promoting data literacy and developing tools, such as data principles and the data frame, to help incentivize data considerations throughout the entire data lifecycle. It is also leading CBSA's data and analytics enterprise visions through data strategies, policies, and processes. In addition, the GBA+ Centre of Responsibility (CoR) continues to promote increased senior management engagement and decision making in GBA+, strengthen policy advice to support GBA+ implementation, and expand stakeholder and partnership engagement. To this end, the CoR is working to implement a GBA+ governance structure to align GBA+ work across the Agency, including a GBA+ strategy to identify the Agency's priorities to guide annual plans. Guided by those overarching strategies related to GBA+ and data, the VPs identified will be responsible for implementing data

collection, retention, management, and analysis in support of GBA+ in each of their respective branches.

It is recognized that due to their complexities, the reference data, systems, and processes to support GBA+ require a long-term strategy and solutions. By establishing a clear vision and aligning and coordinating roles and responsibilities of data across the Agency, it will be possible to harness data as a strategic asset and make better decisions informed by GBA+.

Management action plan	Completion date
1.1 Engage relevant branches and seek strategic direction from the Executive Committee (EC) on a long-term vision for GBA+ analysis.	March 31, 2022
1.2 Develop a plan to operationalize EC direction, including objectives, methodology, and priority areas for data collection, retention, management, and analysis.	June 30, 2022

RECOMMENDATION 2

The VP of Travellers Branch should, in consultation with key branches, develop and seek Executive Committee-level approval of a plan, with implementation timelines and change management strategies, to support the future use and integration of GBA+ in the travellers stream and to leverage the results for improvements in travellers processing.

Management response

The VP of Travellers Branch agrees with this recommendation and will work with all VPs mentioned to approve a plan, with implementation timelines and change management strategies, to support the future use and integration of GBA+ in the travellers stream and to leverage the results for improvements in travellers processing. Given that each of the recommendations in the evaluation are mutually supportive, it will be essential for all branches to collaborate on both the overarching guidance in this recommendation, as well as the specific activities to advance GBA+.

It is recognized that due to their complexities, the reference data, systems, and processes to support GBA+ require a long-term strategy and solutions. By establishing a clear vision and aligning and coordinating roles and responsibilities of data across the Agency, it will be possible to harness data as a strategic asset and make better decisions informed by GBA+.

Management action plan	Completion date
2.1 Engage IEB, FCMB (Recourse Directorate, CBSA Complaints), SPB, CTOB, HRB, CTB, and ISTB to develop an operationalization plan in support of the future use, integration, and tracking of GBA+ data in the travellers stream, which includes: <ul style="list-style-type: none"> a. Consultation plan b. Change management options c. Analysis of data tracking and current SOPs to identify gaps and areas of improvement 	September 30, 2022
2.2 Seek Executive Committee-level approval of the operationalization plan developed in action item 2.1.	December 31, 2022

RECOMMENDATION 3

The VP of Travellers Branch should, in collaboration with key branches, make the “Processing of Indigenous Travellers and their Sacred Goods” and the “Positive Space at the CBSA” courses, as well as Unconscious Bias Training, mandatory for frontline employees in the travellers stream and create a plan to raise awareness of GBA+ related courses (mandatory and non-mandatory) and resources within the Public Service among all travellers stream employees.

Management response

The VP of the Travellers Branch agrees with this recommendation and will work with all VPs mentioned to convert existing, non-mandatory training to mandatory training, and create new mandatory training to address gaps in current GBA+ knowledge bases. Given that each of the recommendations in the evaluation are mutually supportive, it will be essential for all branches to collaborate on both the overarching guidance in this recommendation, as well as the specific activities to advance GBA+. Mandatory training will result in raised awareness of GBA+ which will enable better data collection and GBA+ implementation across CBSA business lines.

HRB has already begun work in the development of content for the new anti-racism training, for all CBSA employees. This training will include content on unconscious bias and other subjects related to race. The target is to launch a pilot this fall 2021, with a wider launch in Q4 2021-2022.

The recommendation indicates this mandatory training should be for “frontline employees in the travellers stream.” However, this mandatory training may not apply equally to all frontline operations groups. Consideration will be given to separating the training requirements as follows:

- Training applicable only for Border Services Officers (BSO), Superintendents (Supt), Chiefs (POE), Criminal Investigators (CI), Enforcement Case Officers (ECO), Intelligence Officers (IO), Inland Enforcement Officers (IEO)
 - a. Processing of Indigenous Travellers and their Sacred Goods (S7189-P) for frontline
- Training for all frontline groups:
 - a. Positive Space at the CBSA (H1016-P)
 - b. Preventing Racial Profiling Frontline (H1015-P)

Management action plan	Completion date
<p>3.1 Seek agreement for training policy changes from HRB, IEB, SPB, CTOB, and CTB to:</p> <ul style="list-style-type: none"> ○ Identify relevant travellers stream personnel to receive new mandatory and/or function-specific or professional development training; ○ Add the “Processing of Indigenous Travellers and their Sacred Goods”, the “Positive Space at the CBSA” and “Introduction to Gender Based Analysis Plus” courses, as well as “Unconscious Bias” training to relevant mandatory training curricula; ○ Expand the target audience to the “Preventing Racial Profiling at the Frontline” mandatory course to include other groups with indirect communication with the public. 	September 30, 2021
<p>3.2 Request that the Training and Development Directorate (TDD) amend applicable National Training Standards (NTS) with the new mandatory and function-specific or professional development training course information.</p>	November 30, 2021
<p>3.3 Communicate new mandatory and function-specific training requirements to implicated operational travellers stream staff and begin training implementation.</p>	January 31, 2022
<p>3.4 Create a plan to raise awareness of GBA+ related courses (mandatory and non-mandatory) and resources within the Public Service among all travellers stream employees.</p>	February 28, 2022

RECOMMENDATION 4

The VP of Travellers Branch should, in collaboration with the VP of Human Resources Branch and the VP of Chief Transformation Officer Branch, develop and implement a plan to improve the awareness and reporting of mistreatment and discrimination of travellers witnessed by CBSA personnel, without fear of reprisal.

Management response

The VP of Travellers Branch agrees with this recommendation and will work with HRB and CTOB, and will consult with the Internal Audit and Program Evaluation Directorate (i.e. Senior Officer for Internal Disclosure) and others, in the development and implementation of a plan that improves the awareness and reporting of mistreatment and discrimination of travellers witnessed by CBSA personnel, without fear of reprisal. Given that each of the recommendations in the evaluation are mutually supportive, it will be essential for all branches to collaborate on both the overarching guidance in this recommendation, as well as the specific activities to advance GBA+.

Management action plan	Completion date
4.1 Identify representatives from TB, HRB, CTOB, FCMB, IAPED (i.e. SOID) and CIU stewards/staff and establish a working group to identify causes for reporting hesitancy.	January 31, 2022
4.2 Create and launch a travellers stream staff survey.	February 28, 2022
4.3 Develop a plan to improve awareness and reporting of mistreatment and discrimination of travellers.	April 1, 2022
4.4 Seek executive committee-level approval of the plan developed in action item 4.3.	June 30, 2022
4.5 Develop informational materials and tools, and begin the execution of the approved plan.	July 31, 2022

Appendix B: Evaluation Definitions

Advance Passenger Information (API): Information submitted electronically pre-arrival by Commercial airlines. Contains basic information about passengers and crew members, including name, date of birth, gender, citizenship, and travel document data (e.g. passport number), used by the NTC to perform risk assessments.

Departure country: Herein, departure country refers to the first country of departure of a traveller entering Canada by air.

Enforcement: Enforcement is the act of compelling adherence to the law. Enforcement represents an essential tool in ensuring that the CBSA meets its goal of compliance. It includes a wide range of activities (examination, audit, investigation, seizure prosecution, etc.) designed to detect, correct and deter non-compliance.

Examination: An examination is an inspection applied to goods, baggage, and conveyances for the purpose of appraisal or classification, to confirm a declaration made concerning goods, baggage, and conveyances, or to search for contraband or unreported or improperly reported goods.

Flight List Targeting: API/PNR data elements are used by the National Targeting Centre to risk assess incoming travellers on flights categorized as “high-risk.” In contrast with Scenario Based Targeting, Targeting Officers sort and assess these data elements, based on a comprehensive flight manifest.

Indicator (i.e. within a release request): A single piece of information, trend, abnormality, or inconsistency that, when added to other information or data, raises a concern to a targeting officer about the threat presented by a traveller or shipment. Indicators may be based on current or historical data, API/PNR information, ACI data, supplementary database information or other information.

Passenger Name Record (PNR): Information that comes from commercial airline’s departure control and reservations systems. PNR data can include ticket type, date of travel, number of bags, and seating information and can be used by the NTC to perform risk assessments.

Referral: A referral is the result of designating selected persons, conveyances, and/or goods for further customs processing, most commonly from primary to secondary for activities, such as payment of duties and taxes, examination, etc. There are three types of referrals:

- **Mandatory Referral** – A referral that a Border Service Officer must make for further documentation or examination, whether it is for CBSA purposes or for that of other

government departments. Mandatory referrals can be based on a [*] a computer-generated “hit”.

- Random Referral – A referral based on a system, sometimes computer generated, which selects shipments and persons for examination in an indefinite pattern.
- Selective Referral – A referral that a Border Services Officer makes to the secondary inspection area following the establishment of a point of finality because they suspect that an additional examination or investigation is necessary to make a decision on release.

Resultant: A “resultant” examination is a situation whereby the CBSA has identified, during the examination process, a contravention to the *Customs Act* and/or any other act of Parliament administered or enforced by the CBSA on behalf of other government organizations. An examination is resultant if any one or more of the following actions occur during an examination:

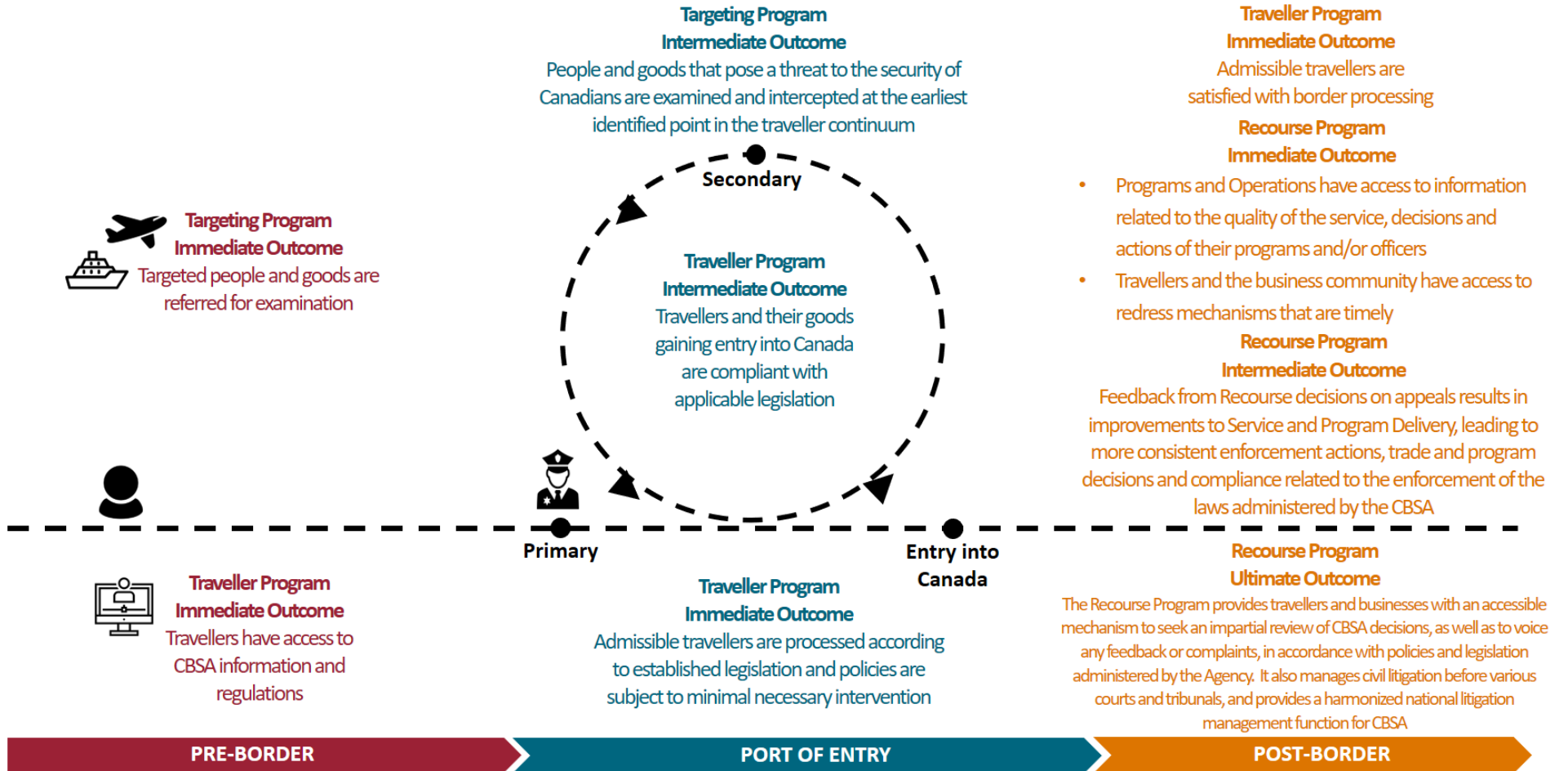
- Seizure
- Administrative and Monetary Penalty System
- Ascertained Forfeiture
- Notice of Determination
- Inadmissible goods, by the CBSA’s or OGDs’ determination, that are ordered removed from Canada or sent for destruction

Scenario-based targeting: Query rules are used by the National Targeting Centre to match Advanced Passenger Information (API) and Passenger Name Record (PNR), submitted to the CBSA by commercial air carriers, with scenarios for further risk assessment of incoming travellers. Targeting officers review all scenario matches and decide whether to issue a target.

Appendix C: Travellers continuum outcomes

CBSA Strategic Outcome

International trade and travel is facilitated across Canada's border and Canada's population is protected from border-related risks



Appendix D: Travellers Branch performance indicators

Departmental Plan result	Departmental Plan result indicator	Departmental Plan target	EA ACP Description
Travellers and their goods are compliant with applicable legislation	Percentage of traveller examinations that produced a result (enforcement or facilitation action)	At least 35%	This indicator calculates the percentage of traveller examinations that produce an immigration result (enforcement or facilitation action) out of total immigration examinations (all modes)
	Traveller goods selective examination resultant rate is "X" times higher than random examination resultant rate in the air mode	At least 10 times higher	The new proposed key performance indicator measures the effectiveness of the selective referral program in the air mode

Appendix E: Evaluation methodology and data limitations

The CBSA Risk-Based Audit and Evaluation Plan for Fiscal Year (FY) 2018-2023 identified the Traveller Facilitation and Compliance Program as a priority for evaluation. The original evaluation scope included:

- an assessment on the extent to which gender and other intersecting identity factors were considered in the design; and
- the development and implementation of traveller processing and enforcement activities and how those activities may impact diverse groups of travellers' border experience across all four modes (marine, air, land [highway], and rail), over the course of five fiscal years (FY 2014-2015 to FY 2019-2020).

This scope was endorsed by the Performance Measurement and Evaluation Committee (PMEC) on January 29, 2020.

The evaluation plan, which included the evaluation questions, was developed based on the evaluation scope and the model of the travellers continuum, in consultation with two groups:

- the Evaluation Working Group comprising a number of headquarters program stakeholders; and
- the Evaluation Advisory Committee comprising Directors General from all relevant CBSA branches.

Evaluation questions

Consultations with key stakeholders and a review of key documents during the planning stage assisted in refining the evaluation questions. This ensured that the evaluation would provide useful information for decision-making. The following evaluation questions focused on an assessment of how the Agency and its activities and outcomes impact diverse groups of Travellers:

1. To what extent does the scenario based targeting (SBT) approach consider impacts on travellers, through a GBA+ lens, when targeting travellers?
2. To what extent GBA+ variables were considered in traveller inspections at ports of entry in Canada between FY2014-2015 and FY2019-2020?
3. To what extent does the Traveller Program consider the development and achievement of its outputs and outcomes through the GBA+ lens?
 - a. To what extent is the Traveller Program developing communication products/delivering outreach from a GBA+ perspective?
 - b. To what extent are admissible travellers satisfied with border processing (i.e., professionalism, courteousness, timeliness, and quality and services standards) from a GBA+ perspective?

- c. To what extent is the Traveller Program effective in processing admissible travellers according to established legislation and policies? Are admissible travellers subjected to minimal necessary intervention?
4. How does the Traveller Program consider GBA+ variables between and within target population groups? Are diverse groups treated equitably by the Program?

Data collection methods/sources

Multiple data collection methods and sources were used, including:

- document review
- HR and operational data
- semi-structured interviews with internal program stakeholders
- survey data

The evidence that was collected based on the above-mentioned methods and sources was compiled and analyzed as a whole. The common themes that emerged from multiple lines of evidence contributed to the development of preliminary evaluation findings. These findings, alongside the evidence that informed them, were presented to the Working Group and the Evaluation Advisory Committee for review and input. The feedback from these consultations was incorporated, where relevant, into the final evaluation report and recommendations.

Document review

The document review took place throughout the evaluation project, from the planning to the reporting phases. It was used to inform the evaluation scope, plan, and questions. Over 100 documents were reviewed, including internal CBSA program documents. Documents were reviewed systematically and, where appropriate, evidence was compiled.

Operational data

The CBSA Program Evaluation Division (PED) collected and analyzed operational data from a variety of internal IT systems.

HR data

The analysis of HR data included information on Diversity and Race Relations and Preventing Racial Profiling at the Frontline training participation data from the Human Resources Branch, as of March 31, 2020.

Operational data

The analysis of operational data included data from the tracking sheets from the NTC, and the following CBSA IT systems:

- COGNOS (CMRS)
- SPPH
- ICES

The operational data was provided to the CBSA PED by the CBSA’s Strategic Policy Branch (SPB), the National Targeting Centre (NTC), and Information, Science and Technology Branch (ISTB). The time period for the data originating from the CBSA’s IT Systems and the NTC varied due to availability and reliability. The time period for each data source are as follows:

Table 13: Time periods for the operational data received

Operational data	Time period
NTC – Scenario performance data	FY 2014-15 to FY 2020-21 (July 2020)
NTC – Accumulated tracking sheets	FY 2015-16 to FY 2019-20
COGNOS (CMRS)	FY 2015-16 to FY 2020-21
SPPH	FY 2014-15 to FY 2020-21
ICES – Seizures	FY 2018-19 to FY 2020-21
ICES – Personal searches	FY 2015-16 to FY 2019-20

A note on calculating the resultant rate for customs examinations

Calculating an accurate resultant rate is challenging due to the lack of data integration between IT systems, which capture whether a customs exam has occurred (i.e. Secondary Processing Passage History) and whether enforcement actions such as seizures are recorded in ICES. Each customs exam in SPPH could have one or more “resultant” records in ICES. Currently, this issue cannot be resolved.

When conducting a GBA+, the resultant rate can be extremely inflated for small subpopulations, which might give a false indication of the level of risk from these groups, for example, gender categories that are not male or female, or countries with a low percentage of travel volumes or customs exams, such as [*]. There could be more than one resultant enforcement action for a passage with a customs exam. In particular, this is highlighted by the examples of an unknown or unspecified gender category, or in the case of citizens of [*] who have a resultant rate greater than 100%.

Table 14: Resultant rates by gender

Gender	Customs exam	Total resultant (Seizures, AAMPS, searches and arrests)	Resultant rate
Female	[*]	[*]	[*]
Male	[*]	[*]	[*]
Unknown or unspecified	[*]	[*]	[*]

Source: SPPH, ICES Data, FY 2018-19 to 2020-21.

Table 15: Resultant rates by citizenship

Citizenship	Customs exam	Total resultant (Seizures, AAMPS, searches and arrests)	Resultant rate
[*]	[*]	[*]	[*]

[*]	[*]	[*]	[*]
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Source: SPPH, ICES Data, FY 2018-19 to 2020-21.

Semi-structured interviews with Government of Canada stakeholders

Interviews were conducted via teleconference with 15 internal program representatives.

Interviewees received in advance semi-structured interview guides that included an outline of key issues and questions for discussion. Most interviews took place in October 2020. The interview data was then compiled and analyzed, and emerging themes were established.

Survey

CBSA PED administered a survey to BSOs, superintendents and NTC targeting officers who have worked in the travellers stream within the last two years. The survey was launched on March 2, 2020 and concluded on March 22, 2020. Survey responses were received from 922 frontline officers³⁵ (with a 20% response rate) and 20 targeting officers (with a 38% response rate). The structure and design of the survey ensured that respondents answered only the questions that were relevant to their roles and responsibilities with respect to the Traveller Continuum. The survey was designed in consultation with representatives of the Travellers Branch, the Intelligence and Enforcement Branch, the GBA+ Centre of Responsibility, the Indigenous Affairs Secretariat, the LGBTQ2+ Advisory Committee, and with Regional Directors General.

Key limitations identified during data collection and analysis

Some limitations and challenges were identified during the data collection and analysis process.

Table 16: Limitations and mitigation strategies

Limitation	Mitigation strategy
<p>Operational data</p> <ul style="list-style-type: none"> • Inability to conduct a comprehensive GBA+ of the entire traveller continuum. • Level of time, effort, and expertise required to obtain certain data, for which there are no sufficient reporting tools in place. • There were a number of evaluation indicators for which data were not available. As a result, the evaluation was unable to comment on these areas. • Prior to August 2019, referral data for the highway mode did not distinguish 	<p>The evaluation continued to seek feedback on evaluation preliminary findings from stakeholders. Through this process, more data became available to the evaluators. However, there were several evaluation indicators for which data were not available. As a result, the evaluation was unable to comment on these areas.</p> <p>Throughout the report there are suggestions of areas where stakeholders could conduct further investigation. Evaluation Recommendation 3 addresses this concern</p>

³⁵ Included BSOs and Superintendents.

Limitation	Mitigation strategy
<p>between referral types. Data was only available for referral and release decisions.</p> <ul style="list-style-type: none"> • DSO request for only three years of ICES data in the air mode. • Travellers Branch monitored rover referrals and results for about a year, after the issuance of the PIK roving note in March 2018. Data for rover referral improved after June 2018. • Lack of standard definition of certain data elements and/or data dictionaries. 	<p>by recommending the creation of an action plan, which includes options to:</p> <ul style="list-style-type: none"> • increase standardization and accessibility in data dictionaries, business definition, and mapping; and • assess the Agency’s current resource capacity for data analytics in the commercial stream (e.g. subject matter expertise, data fluency, and analytical and technical competency).
<p>Evaluation survey</p> <ul style="list-style-type: none"> • Small population of NTC targeting officers • Survey excludes any respondents that are not currently BSOs, Superintendents, or NTC Targeting Officers, even if they were recently in those positions • Low response rate for certain subpopulations • Response biases / non-response biases 	<p>The evaluation presented results on the national level, and did not disaggregate responses by region, mode, or demographic characteristics. At the national level, a response rate of 20% was achieved. In recognition of potential response biases, and an 80% non-response bias, the evaluation team used survey data in conjunction with other lines of evidence and clearly indicate the proportions and absolute numbers of respondents specific to the results presented. The evaluation team was aware of possible over-represented and under-represented groups among those that responded or did not respond to the survey.</p>
<p>Interviews</p> <ul style="list-style-type: none"> • Only 15 formal interviews were conducted with internal program representatives. 	<p>Interview data is only presented alongside other lines of evidence. The evaluation team also mitigated this issue through regular and frequent consultations with program subject matter experts.</p>
<p>Complaints data</p> <ul style="list-style-type: none"> • Complaints from three airports between July 1 2016 and July 1 2018, only in the Air mode 	<p>Complaints data is only presented alongside other lines of evidence and absolute numbers. Proportions are clearly identified when these data are presented.</p>

Limitation	Mitigation strategy
<p>COVID-19</p> <ul style="list-style-type: none"> • Evaluation was put on hold for two months, as a result of the pandemic • Prevented the evaluation team from conducting field observations at ports of entry • travellers stream trends changed dramatically following the implementation of COVID-19 travel restrictions (March 2020 to present) 	<p>The evaluation has identified the overall impact of COVID-19 on volumes and enforcement activities.</p> <p>The lack of field research was supplemented with open-text and close-ended survey response data from 942 respondents (BSOs, Supts, and NTC Targeting Officers), and with regional representatives, have been included on the evaluation working group and EAC.</p>

Appendix F: Survey respondents – Participation in GBA+ related training

Table 17: Survey respondents' participation in mandatory and non-mandatory GBA+ related training

	Yes		No		I don't know		Not applicable	
	n	%	n	%	n	%	n	%
Training provider: Canada Border Services Agency								
Diversity and Race Relations <i>(Mandatory for all CBSA)</i>	767	81%	108	11%	63	7%	4	0%
Preventing Racial Profiling at the Frontline <i>(Mandatory for frontline employees)</i>	667	72%	161	17%	84	9%	10	1%
Processing Indigenous Travellers and their Sacred Goods <i>(Mandatory for frontline employees working at Cornwall port of entry)</i>	475	50%	377	40%	78	8%	12	1%
KAIROS Blanket Exercise <i>(Non-mandatory)</i>	127	13%	624	66%	160	17%	31	3%
Positive Space at the CBSA <i>(Non-mandatory)</i>	258	27%	497	53%	162	17%	25	3%
Training provider: Canada School of Public Service	n	%	n	%	n	%	n	%
Gender-based Analysis Plus: A Strong Foundation <i>(Non-mandatory)</i>	152	16%	600	64%	160	17%	30	3%
Gender-based Analysis Plus (GBA+): Applying Your Knowledge <i>(Non-mandatory)</i>	134	14%	612	65%	170	18%	26	3%
Understanding Unconscious Bias <i>(Non-mandatory)</i>	237	25%	518	55%	160	17%	27	3%
Overcoming Your Own Unconscious Biases <i>(Non-mandatory)</i>	204	22%	548	58%	161	17%	29	3%
Positive Space Initiative: LGBTQ2+ Awareness <i>(Non-mandatory)</i>	186	20%	583	62%	147	16%	26	3%
Indigenous Learning Series <i>(Non-mandatory)</i>	173	18%	595	63%	143	15%	31	3%
Training provider: Women and Gender Equality Canada	n	%	n	%	n	%	n	%
Introduction to GBA+ <i>(Non-mandatory)</i>	104	11%	647	69%	159	17%	32	3%