

REGULATORY ASSESSMENT REPORT · EDITION 01

Assessment of the Kordis platform against Canadian requirements governing the use of artificial intelligence in recruitment and employment

Federal Canada together with all ten provinces and three territories. Prepared under the criteria set out in section 2.2 for the assessment period 1 January 2026 to 31 July 2026.

About this report

This report sets out the requirements of Canadian law applicable to the use of artificial intelligence in recruitment and employment, the controls operated within the Kordis platform that address those requirements, the procedures performed to assess whether those controls are in place and operating, and the results of that assessment.

Purpose

Kordis supplies software to Canadian temporary staffing agencies. The agency, not Kordis, is the employer, and the majority of the legal obligations described in this report fall on the agency rather than on Kordis. An agency cannot discharge a disclosure obligation that its software gives it no way to trigger, and it cannot produce an explanation of an assessment that its software does not retain. This report is published so that an agency, a candidate, a client of an agency, a regulator or a professional adviser can establish which obligations apply, which controls address them, and what was found on testing.

Basis of preparation

The report has been prepared in accordance with the basis set out in section 2. Statements of legal status are current as at 12 August 2026 and were verified against primary sources or, where a primary source could not be retrieved, against no fewer than two independent professional sources. Section 2.6 records the inherent limitations of the assessment, and section 2.7 records the restriction on its use. Appendix D sets out the basis of preparation for each quantified figure stated in the report.

Structure

Sections 1 and 2 record the statement by management and the basis of the assessment. Section 3 describes the system assessed. Section 4 sets out the methodology. Section 5 states the applicable requirements by jurisdiction. Section 6 presents the control activities, the procedures performed and the results of those procedures. Section 7 records the findings. Sections 8 to 10 address excluded capabilities, voluntary standards and requirements not yet in force. Appendices A to E carry the register of instruments, the control index, the complementary controls to be operated by the agency, the basis of preparation for stated figures and the signed statement by management.

Statements about future conduct

Statements in this report concerning intended future action, including any statement recorded in the findings register at section 7.2 as remediation, are statements of present intention and not guarantees. They are subject to change. Their inclusion is not an indication that the matter is material to the business or results of the reporting entity.

Not legal advice

This report describes the design and operation of a software platform and the regulatory framework applicable to its use. It is not legal advice and it is not a substitute for advice from an adviser retained by the reader on the reader's own operations. Where a requirement is stated to bind the agency, responsibility for compliance with that requirement rests with the agency.

Contact

Enquiries concerning this report, and requests by an individual to exercise a right described in section 6.5, may be directed to the privacy officer identified at kordisai.com/privacy. The current list of subprocessors, the retention schedule and the escalation route to the Office of the Privacy Commissioner of Canada and to the provincial commissioners are published at the same address.

Document control

DOCUMENT REFERENCE	KAI-RA-2026-01
TITLE	Assessment of the Kordis platform against Canadian requirements governing the use of artificial intelligence in recruitment and employment
EDITION	Edition 01
VERSION	1.0, final
CLASSIFICATION	Public disclosure. No restriction on circulation.
REPORTING ENTITY	17989296 Canada Inc., trading as Kordis, Toronto, Ontario, Canada
SUBJECT MATTER	The Kordis platform as described at section 3
ASSESSMENT PERIOD	1 January 2026 to 31 July 2026
LEGAL STATUS CURRENT TO	12 August 2026 Privacy officer, Kordis
OWNER	Management of the reporting entity, 12 August 2026
APPROVED BY	
DATE OF ISSUE	12 August 2026
NEXT SCHEDULED REVIEW	12 August 2027, or earlier on the occurrence of a trigger listed at section 10.4

Table 0.1 Revision history

VERSION	DATE	PREPARED BY	SUMMARY OF CHANGE
0.9	5 August 2026	Privacy officer	Draft issued for internal review. Control matrix at section 6 completed.
1.0	12 August 2026	Privacy officer	Findings at section 7 finalised following completion of procedures. Approved for publication.

No prior edition of this report exists. Section 3.6 accordingly records no comparative changes to the system.

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Abbreviations and defined terms

The following abbreviations and defined terms are used throughout. A term defined here is used consistently and is not redefined elsewhere in the report.

TERM	MEANING
the agency	A temporary staffing agency that licenses the platform. The agency is the employer of the workers it places and, except where stated otherwise, is the party on which the legal obligations described in this report fall.
the platform	The Kordis software platform, as described at section 3.
the reporting entity	17989296 Canada Inc., trading as Kordis.
AODA	Accessibility for Ontarians with Disabilities Act, 2005, S.O. 2005, c. 11.
the band	The outcome of a rubric assessment, being one of three values: qualified, review, or reject. Defined at section 3.3.
CAI	Commission d'accès à l'information du Québec.
CASL	An Act to promote the efficiency and adaptability of the Canadian economy, S.C. 2010, c. 23, commonly known as Canada's anti-spam legislation.
the Code	Where used without qualification, the Human Rights Code, R.S.O. 1990, c. H.19 (Ontario).
ESA	Employment Standards Act, 2000, S.O. 2000, c. 41 (Ontario).
IASR	Integrated Accessibility Standards, O. Reg. 191/11, made under AODA.
Law 25	The Act respecting the protection of personal information in the private sector, CQLR c. P-39.1, as amended by S.Q. 2021, c. 25.
OIPC	Office of the Information and Privacy Commissioner, of the province indicated.
OPC	Office of the Privacy Commissioner of Canada.
PIPA	Personal Information Protection Act, of British Columbia (SBC 2003, c. 63) or Alberta (SA 2003, c. P-6.5), as indicated.
PIPEDA	Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5.
the prescreen	The structured first round interview conducted by the platform by telephone, as described at section 3.2.
PSC guidance	Public Service Commission of Canada, <i>Artificial intelligence in the hiring process</i> , issued under the Appointment Framework.
the rubric	The set of assessment criteria, weights and thresholds authored or adopted by the agency, against which a candidate's captured answers are scored. Defined at section 3.3.
THA	Temporary help agency, within the meaning of Part XVIII.1 of the ESA.

1**Statement by management**

Management of 17989296 Canada Inc., trading as Kordis, is responsible for the design and operation of the controls described in this report and for the accuracy of the description of the system set out at section 3.

We confirm, to the best of our knowledge and belief, that:

- a. the description at section 3 fairly presents the Kordis platform as it was designed and operated throughout the period 1 January 2026 to 31 July 2026;
- b. the requirements stated at section 5 are, so far as we have been able to establish, a complete statement of the Canadian federal, provincial and territorial requirements applicable to the use of artificial intelligence in recruitment and employment by an agency using the platform, current as at 12 August 2026;
- c. the control activities stated at section 6 were in place throughout the period and were designed to address the requirements to which they are mapped;
- d. the results recorded at section 6 are the results actually obtained on performing the procedures described at section 4, without omission; and
- e. every matter arising from those procedures that was not resolved by the close of the period is recorded at section 7, together with an owner and a target date for its resolution.

We further confirm that where a control has not been implemented, or has been implemented but its operating effectiveness has not been tested, the report says so, and that no statement in this report asserts a certification, attestation or independent audit that the reporting entity does not hold. The reporting entity holds no third party certification in respect of the matters covered by this report. Section 9 records the voluntary standards against which the platform has been assessed internally and the status of each.

This report has not been examined by an independent practitioner. It is a statement by management supported by the internal procedures described at section 4. Section 2.6 records the limitations that follow from that.

The signed statement is at Appendix E.

2 Basis of the assessment

2.1 Subject matter

The subject matter of this assessment is the design and operation of the controls within the Kordis platform that address requirements of Canadian law governing the use of artificial intelligence in the recruitment, screening, assessment, communication, scheduling and dispatch of workers, and the handling of the personal information of those workers and of applicants.

2.2 Criteria applied

The criteria against which the platform has been assessed are the requirements of the instruments listed in Appendix A. Those instruments fall into four classes, and the class determines the weight given to the criterion.

Table 2.1 Classes of criteria applied

CLASS	DESCRIPTION	TREATMENT IN THIS REPORT
Binding requirement	A statute or regulation in force in a jurisdiction in which the platform operates.	Assessed. A control is required. A gap is a non-conformity.
Regulator guidance	Guidance issued by a privacy commissioner, human rights commission or other regulator, not itself binding.	Assessed. Treated as the standard by which the reasonableness of a control is measured.
Voluntary standard	A published national or international standard, adoption of which is voluntary.	Assessed at section 9. A gap is recorded as an observation, not as a non-conformity.
Benchmark	A requirement of a jurisdiction in which the platform does not operate, adopted as a comparator.	Stated for comparison only. No control is required by reason of a benchmark alone.

Where the requirements of two jurisdictions differ, the platform is built to the stricter of the two and the stricter standard is applied in every jurisdiction. Section 5.5 records the effect of this on the design, Quebec being the jurisdiction whose requirements are the strictest in five of the ten control domains.

2.3 Period covered and currency of legal statements

The assessment period is 1 January 2026 to 31 July 2026. That period begins on the date on which section 8.4 of the ESA and O. Reg. 476/24 came into force, those being the first provisions of Canadian law to regulate the use of artificial intelligence in hiring expressly.

Statements of legal status, in-force dates and section numbers are current as at 12 August 2026, which is later than the close of the assessment period. Where an instrument came into force, was amended, was replaced or was tabled between 31 July 2026 and 12 August 2026, it is recorded at section 10 and not at section 5.

2.4 Boundary and exclusions

The following are outside the boundary of this assessment. They are stated as exclusions rather than left unaddressed.

- a. Immigration law and the licensing of recruitment of foreign nationals, including the regimes in Manitoba, Saskatchewan, Nova Scotia and Quebec that apply specifically to the recruitment of temporary foreign workers.
- b. Occupational health and safety, workers' compensation registration and premium obligations, and payroll tax, source deduction and remittance obligations.
- c. Sector specific credentialing and licensure of the workers placed.

- d. The general commercial, corporate and tax affairs of the reporting entity, and its financial statements.
- e. Requirements applicable to federally regulated employers, being federal works, undertakings and businesses, except where an agency using the platform places workers with such an employer. Section 5.1 records which federal instruments are excluded on this basis and why.
- f. Jurisdictions outside Canada. The requirements of the European Union, the State of Illinois, the State of Colorado and the City of New York are stated at sections 9 and 10.3 as benchmarks only. The platform is not marketed or sold in those jurisdictions.

Within the boundary, coverage is complete. Every instrument identified is disposed of in Appendix A, either by mapping it to a control or by recording the reason it requires none. No instrument identified during the assessment has been omitted from Appendix A.

2.5

Respective responsibilities

Responsibility for compliance is divided, and the division is material to how this report should be read.

The agency is the employer. Obligations under employment standards legislation, human rights legislation and accessibility legislation fall on the agency. The agency is responsible for the content of its job postings, for the criteria in the rubrics it authors or adopts, for the decision to advance or not to advance a candidate, for holding a valid licence where one is required, and for operating the complementary controls listed at Appendix C.

The reporting entity is responsible for the design and operation of the platform, for the accuracy of the description at section 3, for its own handling of personal information in the course of commercial activity, for the accuracy of the claims it makes about the platform, and for supplying the agency with the information, records and system behaviour without which the agency cannot discharge its own obligations.

A control is recorded in this report as effective only where the part of the obligation that falls on the reporting entity has been addressed. A control cannot compel the agency to act. Where the discharge of an obligation depends on the agency, the dependency is stated in the control description and the corresponding agency control is listed at Appendix C.

2.6

Inherent limitations

The following limitations attach to this report and should be taken into account by any reader relying on it.

- a. The assessment was performed by management. It is not an examination by an independent practitioner and no independent opinion is expressed on it. A reader requiring independent assurance should not treat this report as a substitute for it.
- b. Controls, however well designed, provide reasonable and not absolute assurance. A control may be circumvented, may fail, or may become inadequate because of a change in conditions.
- c. The projection to a future period of any statement in this report is subject to the risk that the platform, the law, or the manner in which the agency operates the platform may change.
- d. Several questions addressed at section 5 are unsettled in Canadian law. The Ontario Ministry of Labour has issued no guidance on the meaning of the words screen, assess or select in section 8.4 of the ESA, and no Canadian court or tribunal has decided a case concerning algorithmic hiring. Where a question is unsettled, the re-

porting entity has adopted the reading least favourable to itself, and section 5 says so at the point at which the question arises.

- e. Where an obligation falls on the agency, the effectiveness of the platform control does not establish that the agency has complied. Compliance by the agency has not been assessed.
- f. Certain primary legal sources could not be retrieved directly during the assessment. The consolidated statutes of Ontario are published on a system that could not be read by the tools used. Section numbers and quoted text drawn from that source were corroborated against no fewer than two independent professional sources and are identified in Appendix A.

2.7

Restriction on use

This report is issued as a public disclosure and may be circulated without restriction. It is intended for agencies using or evaluating the platform, for candidates and workers whose personal information is processed by it, for clients of agencies, for regulators, and for professional advisers to any of them. It is not intended to be, and should not be relied on as, legal advice.

3 Description of the system

3.1 The regulated activity

Kordis is software licensed to temporary staffing agencies in Canada, predominantly in light industrial and warehouse staffing. The platform receives applications, extracts structured data from résumés, conducts a structured first round interview by telephone, scores the answers against the agency's rubric, sends and receives text messages, books interviews and shifts, collects onboarding documents and signatures, and orders available workers for open shifts.

The agency is the employer of record for the workers it places. The reporting entity holds no employment relationship with any worker or candidate. The platform is not a job board, is not a payroll system, and does not act as employer of record.

Six of the activities listed above fall within the definition of artificial intelligence adopted by O. Reg. 476/24 for the purposes of section 8.4 of the ESA. Those are résumé extraction, the conduct of the prescreen, the capture of answers as discrete values, rubric scoring, the ordering of workers for dispatch, and the drafting of onboarding assessment material. Section 5.2 sets out the definition and the basis on which each activity is treated as falling within it.

3.2 Processing stages and decision authority

Table 3.1 records each processing stage, what the platform does at that stage, and where the authority to decide sits. The column headed Decision authority is the operative column for the purposes of section 12.1 of Law 25 and of the human rights requirements at section 5.7.

Table 3.1 Processing stages and decision authority

STAGE	FUNCTION PERFORMED BY THE PLATFORM	DECISION AUTHORITY
Application intake	Hosts a public application portal for each opening and receives applications forwarded from job boards. Presents a layered privacy notice and records an express consent to be contacted.	The agency creates the opening and the posting. No assessment is performed at this stage.
Résumé extraction	Extracts structured fields from an uploaded document through a tiered extraction sequence. The output is data, not an assessment.	Automated. No adverse consequence follows from extraction alone.
Identity resolution	Determines whether two applications relate to the same individual. Where similarity is high but the match is not certain, the records are held.	A person at the agency decides every ambiguous match. The platform performs no automatic merge.
Prescreen	Places an outbound telephone call, reads the jurisdiction specific disclosure, resolves consent, then asks the agency's questions and records each answer as a discrete value against a named dimension.	Automated in conduct. The candidate may decline, request accommodation, or request a person, at any point.
Transcription	Converts recorded speech to text. Assessment is performed on the text.	Automated. See section 8 for the capabilities excluded at this stage.
Rubric scoring	Applies the agency's weights to the captured values, computes a composite score, and applies the agency's thresholds to produce a band.	The agency authors or adopts the rubric, the weights and the thresholds. The computation is deterministic.
Advancement and hire	None. The platform cannot record a candidate as hired or active.	The agency, in every case. The transition requires an operator actor and an explicit activation command.

STAGE	FUNCTION PERFORMED BY THE PLATFORM	DECISION AUTHORITY
Messaging and scheduling	Sends and receives text messages relating to an application, a shift or an assignment. Books and confirms interviews and shifts.	The agency configures which automations operate. Automation settings are held per agency.
Document collection	Collects onboarding documents and signatures over an encrypted channel. Where a document calls for express biometric consent, that consent cannot be satisfied by a blanket signing action.	The agency defines the document set. The worker signs.
Dispatch ordering	Orders available workers for an open shift using a reliability statistic derived from that worker's own record of attending shifts they accepted.	The agency assigns the shift, or the worker claims it.

The three constraints in the row headed Advancement and hire are properties of the worker state machine and of the application assessment record, not of configuration. An application assessment can record only the values declined or not now. It has no field capable of recording an acceptance and it is scoped to a single application, so it cannot alter the worker's status elsewhere in the system. Procedures performed on these constraints are recorded at control D-01 and D-02.

3.3 Assessment logic

The rubric is the assessment instrument. It consists of named dimensions, a weight for each dimension, a scale for each dimension, a set of thresholds, and a list of questions that may not be asked in the jurisdiction concerned. The reporting entity supplies templates for common roles. An agency may author its own rubric or upload one.

Scoring proceeds in three steps. During the call, each answer is captured as a value against the dimension to which it relates, together with a confidence figure. After the call, the captured values are folded through the weights to produce a composite score between 0 and 100. The thresholds are then applied to produce one of three bands.

Table 3.2 Bands and their consequences

BAND	MEANING	CONSEQUENCE
qualified	The composite score met or exceeded the agency's upper threshold and no hard prerequisite failed.	The candidate is presented to the agency as screened. Advancement remains a decision for the agency.
review	The composite score fell between the thresholds, or a red flag was recorded, or a dimension was unanswered or unclear, or no band matched.	The candidate is routed to a person at the agency for a decision.
reject	The composite score fell below the agency's lower threshold, or a hard prerequisite stated in the rubric failed.	The candidate is not advanced. Review by a person with authority to change the outcome is available on request under control D-02.

Four rules govern the resolution of uncertainty. Each was tested. See controls C-05 and D-03.

- A dimension that is unanswered or unclear is never treated as a failure. It routes to the review band.
- A red flag can never produce the qualified band. It caps the outcome at review.
- Where no band matches the composite score, the fallback is review.
- A rubric uploaded by an agency is parsed into a draft with every weight set to zero. It does not score numerically until a person at the agency has assigned the weights.

3.4 Models, service providers and processing locations

Model calls are routed by task class, being classification, conversation, scoring and embedding, to a single approved provider under enterprise terms. A test in the continuous integration pipeline fails the build if any other model provider is introduced anywhere

in the codebase. Speech recognition and speech synthesis are performed by two named providers that perform transcription and synthesis only. The consequence of that constraint is that the published list of subprocessors is a complete list and not a best estimate, which is what permits an agency in Quebec to enumerate every destination for the purposes of section 17 of Law 25.

The platform is hosted on Microsoft Azure in United States regions. Eleven subprocessors are named publicly, covering cloud infrastructure, model inference, telephony, speech recognition, speech synthesis, authentication, payments, background screening, customer support and error monitoring. The hosting region is stated on the reporting entity's security page. Section 5.1 sets out the basis on which processing outside Canada is lawful under PIPEDA and what that requires instead of relocation. Section 5.5 sets out the additional requirement that applies in Quebec.

3.5

Controls assumed to be operated by the agency

The design of the platform assumes that the agency operates certain controls of its own. Where the agency does not, the corresponding platform control may not achieve its purpose. Those controls are listed in full at Appendix C. In summary, the agency is assumed to hold any licence required in its jurisdiction, to publish job postings containing the disclosures required by the jurisdiction in which the work is performed, to author rubric criteria that are job related, to act on candidates routed to the review band, to respond to a request for review of an outcome, to maintain any written policy required of it, and to retain the records that employment standards legislation requires it to retain.

3.6

Significant changes during the period

Two changes to the system during the assessment period are material to this report.

- a. On 8 August 2026, following advice from counsel, certain controls relating to consent to contact, do not call suppression and permitted calling hours were withdrawn from the platform. This report does not describe those controls and does not rely on them. The controls on which the assessment at control I-01 and I-02 relies are sender identification and the unsubscribe facility, which were not affected. The withdrawal occurred after the close of the assessment period and is recorded here for completeness.
- b. The privacy notice published by the reporting entity was revised on 29 July 2026 to restate its obligations by reference to Canadian law. The revised notice is the version relied on at controls A-04 and E-05.

No prior edition of this report exists, so no comparative statement of change is made. Edition 02 will state the change against this edition.

4 Assessment methodology

4.1 Procedures performed

Four classes of procedure were performed. The class is stated in the column headed Procedure performed in every table at section 6, and the description in that column is written in the past tense and states what the procedure was directed to determine.

Table 4.1 Classes of procedure

CLASS	DESCRIPTION
Inquiry	Enquired of the personnel responsible for a function in order to understand how a control is intended to operate and by whom it is performed.
Inspection	Read source code, configuration, policy documents, published pages, database schemas, logs or records containing evidence that a control has operated.
Observation	Observed the operation of a control, including by placing test calls through the prescreen and following a candidate through the application, consent, assessment and rights request paths.
Re-performance	Independently performed the operation a control performs, and compared the result. Applied principally to the scoring computation and to the export and erasure paths.

Where a control is enforced by an automated test in the continuous integration pipeline, the procedure performed included inspecting the test, and where practicable altering the guarded condition in a working copy to confirm that the test fails. A guard that does not fail when the condition it guards is removed is not a control.

Where a procedure was performed on a sample rather than on the whole population, the sample and the population are stated in the result, in the form n of m.

4.2 Control identification and numbering

Controls are grouped into ten domains, lettered A to J, corresponding to the ten sub-sections of section 6. A control reference consists of the domain letter and a sequence number, for example C-04. A reference is stable and will be carried forward into subsequent editions. Where a control is withdrawn, its reference is retired and is not reused.

Appendix B indexes every control against the requirements to which it is mapped. Appendix A indexes every requirement against the controls that address it. Every requirement in Appendix A resolves either to at least one control reference or to a recorded reason why no control is required. There are no unresolved rows.

4.3 Vocabulary of results

The column headed Result in every table at section 6 takes one of five values and no others. The values are defined here and are not qualified elsewhere.

Table 4.2 Permitted values of the result column

VALUE	MEANING
No exceptions noted	The procedures were performed and the control operated as described throughout the period. Nothing was found that indicates otherwise.
Exception noted	The procedures were performed and the control did not operate as described in one or more instances. The instances are stated, with the sample denominator, and the matter is carried to the findings register at section 7.2.

VALUE	MEANING
Implemented, not yet tested	The control is in place and was inspected, but no occurrence arose during the period on which its operating effectiveness could be tested. No conclusion on operating effectiveness is expressed.
Non-occurrence	No event of the type the control addresses occurred during the period. No conclusion on operating effectiveness is expressed.
Not applicable	The requirement to which the control would be mapped does not apply to the reporting entity or to the platform. The reason is stated.

The words compliant, passed, certified and audited are not used in the result column. The reporting entity holds no certification in respect of the matters covered by this report and the report is not an audit within the meaning given to that word by any professional standard.

4.4

Classification of findings

A matter arising from the procedures is classified in one of four ways. The classification determines whether the matter appears in the findings register at section 7.2 or in the observations at section 7.3.

Table 4.3 Classification of matters arising

CLASSIFICATION	DEFINITION	DISPOSITION
Major non-conformity	The absence or total breakdown of a control required by a binding requirement, or a failure that undermines the ability of the platform to meet that requirement.	Section 7.2. Owner and target date required. Escalated to management on identification.
Minor non-conformity	An isolated failure against a binding requirement that does not indicate a systemic breakdown.	Section 7.2. Owner and target date required.
Observation	Not a breach of any binding requirement. A weakness, or an opportunity to strengthen a control ahead of a requirement not yet in force.	Section 7.3. Owner and target date recorded where one has been set.
Not a finding	The matter was raised during the procedures and resolved without a control change, or was found on examination not to be a deficiency.	Not carried forward.

A finding carried forward from a prior edition and not closed is flagged as a repeat finding and is escalated on that basis alone. No prior edition exists, so no finding in this edition is a repeat.

Every finding is stated in three parts, in this order: the requirement that applies, the fact observed, and the respect in which the fact falls short of the requirement. Remediation is stated separately from the finding and is not permitted to qualify it.

5 Applicable requirements

This section states the requirements against which the platform has been assessed. It is organised by jurisdiction. Section 5.7 addresses a requirement that recurs in substantially identical terms in ten jurisdictions and is treated once rather than ten times.

5.1 Federal Canada

There is no federal statute in Canada governing artificial intelligence. The Artificial Intelligence and Data Act, contained in Part 3 of Bill C-27, was never enacted; it died on the Order Paper on the prorogation of Parliament in January 2025 and has not been reintroduced. A national artificial intelligence strategy was announced in June 2026. A strategy imposes no obligation on a vendor. Three federal instruments bind the reporting entity or the agency, and they are set out in Table 5.1.

Table 5.1 Federal requirements assessed

INSTRUMENT AND PROVISION	REQUIREMENT	BINDS	CONTROLS
PIPEDA, s. 5(1) and Schedule 1S.C. 2000, c. 5	Compliance with the ten fair information principles, being accountability, identifying purposes, consent, limiting collection, limiting use disclosure and retention, accuracy, safeguards, openness, individual access and challenging compliance.	Both	A-04, B-01, E-01 to E-05, F-01 to F-06, G-01, J-01
PIPEDA, s. 5(3)	Personal information may be collected, used or disclosed only for purposes that a reasonable person would consider appropriate in the circumstances.	Both	C-01, C-02, F-01
PIPEDA, Schedule 1, cl. 4.1.3	An organisation remains accountable for personal information transferred to a third party for processing, and must use contractual or other means to secure a comparable level of protection.	Both	F-06, J-03
PIPEDA, s. 10.1	Report to the Commissioner and notify affected individuals of a breach of security safeguards involving a real risk of significant harm; maintain records of every breach.	Both	J-04
CASL, ss. 6(1), 6(2), 11S.C. 2010, c. 23	A commercial electronic message must identify the sender and any person on whose behalf it is sent, provide contact information valid for at least 60 days, and include an unsubscribe mechanism given effect within 10 business days.	Both	I-01, I-02, I-03
Competition Act, ss. 52, 74.01(1)(a), 74.01(1)(b)R.S.C. 1985, c. C-34	No materially false or misleading representation. No claim as to performance or effectiveness that is not based on an adequate and proper test conducted before the claim is made.	Kordis	J-05

5.1.1 Processing outside Canada

The platform processes personal information in the United States. Canadian federal law does not prohibit this. The guidance of the Office of the Privacy Commissioner on trans-border data flows states that PIPEDA does not prohibit an organisation in Canada from transferring personal information to an organisation in another jurisdiction for processing, and that it does not distinguish between domestic and international transfers. A transfer to a processor is a use of the information and not a disclosure of it, and accordingly requires no separate consent. The Commissioner proposed to reverse that position in April 2019 and withdrew the proposal on 23 September 2019, confirming that

the guidelines would remain unchanged. That position stood throughout the assessment period.

What the law requires instead of relocation is accountability under clause 4.1.3 of Schedule 1, by contractual or other means securing a comparable level of protection, together with transparency: individuals should be told, in clear language, that their information may be processed outside Canada and may be accessible to the law enforcement and national security authorities of that jurisdiction. Controls F-06 and A-04 address those requirements. Section 5.5.2 sets out the additional requirement that applies in Quebec, which is not satisfied by the federal position.

5.1.2 **Federal instruments excluded, and the reason**

The Canadian Human Rights Act, the Employment Equity Act, the Accessible Canada Act, the Public Service Employment Act and the Treasury Board Directive on Automated Decision-Making bind federal works, undertakings and businesses, or federal institutions. A light industrial staffing agency in Ontario, British Columbia or Alberta is provincially regulated and is bound by none of them. They are excluded from the assessment on that basis and recorded as excluded in Appendix A. Overstating federal reach in a published compliance document would itself engage section 74.01 of the Competition Act.

Three federal instruments that do not bind the reporting entity have nonetheless been adopted voluntarily as criteria, because they are the most detailed statements of expected practice that Canadian government bodies have published. They are the PSC guidance, the Treasury Board Algorithmic Impact Assessment, and the joint principles on generative artificial intelligence issued by the federal, provincial and territorial privacy commissioners in December 2023. Section 9 records the assessment against each.

5.1.3 **The status of CASL in a recruitment context**

A recurring assumption in the staffing sector is that a message about a job is not a commercial electronic message and that CASL therefore does not apply. That assumption was examined and was not adopted. Guidance issued by the CRTC states that most recruitment messages fall outside CASL because they do not promote a product or service, and then records that a recruitment firm which offers an option to subscribe to job notifications would likely be considered commercial in nature and subject to CASL. The customers of the reporting entity are recruitment businesses.

Two further points were taken into account. Paragraph 6(6)(e) exempts a message providing information directly related to an employment relationship in which the recipient is currently involved; it applies to a placed worker and not to an applicant. Section 6(6) disapplies only the consent requirement in paragraph 6(1)(a) and leaves the identification and unsubscribe requirements in section 6(2) in force. Controls I-01 to I-03 accordingly apply the identification and unsubscribe requirements to every outbound message without regard to whether an exemption is available.

5.2 **Ontario**

Ontario is the only jurisdiction in Canada in which the use of artificial intelligence in hiring is regulated expressly, and it is the jurisdiction in which the majority of agencies using the platform operate.

Table 5.2 Ontario requirements assessed

INSTRUMENT AND PROVISION	IN FORCE	REQUIREMENT	BINDS AND CONTROLS
ESA, s. 8.4 and O. Reg. 476/24	1 Jan 2026	An employer using artificial intelligence to screen, assess or select applicants for a publicly advertised job posting must include in the posting a statement disclosing that use.	Agency. A-01, A-02
ESA, s. 8.2	1 Jan 2026	State the expected compensation or a range. A stated range may not exceed \$50,000.	Agency. A-06
ESA, s. 8.3	1 Jan 2026	No requirement for Canadian experience, Canadian education credentials or Canadian professional networks, in the posting or in the associated application form.	Agency. C-03
ESA, s. 8.5	1 Jan 2026	State whether the posting is for a currently existing vacancy.	Agency. A-06
ESA, s. 8.6	1 Jan 2026	Inform an applicant who was interviewed whether a hiring decision has been made, within 45 days of the last interview.	Agency. E-06
ESA, ss. 15(7.1), 15(7.1.1)	1 Jan 2026	Retain copies of every publicly advertised posting, the application form, every version, and the information provided to interviewed applicants, for three years.	Agency. G-03
ESA, Part XVIII.1 and O. Reg. 99/23	1 Jul 2024	A temporary help agency must be licensed and a recruiter must be licensed. A client is prohibited from knowingly engaging an unlicensed agency.	Agency and its clients. J-06
ESA, s. 41.1.1	In force	An employer of 25 or more must maintain a written policy on electronic monitoring and provide it to an assignment employee within 24 hours of the start of an assignment.	Agency. Appendix C, item 6
Human Rights Code, ss. 5, 11, 17, 23	In force	Equal treatment in employment on 16 grounds. No application form or written or oral inquiry that directly or indirectly classifies. No neutral requirement with adverse effect that is not reasonable and bona fide. Accommodation to the point of undue hardship.	Both. C-01 to C-06, H-01 to H-04
AODA and IASR, ss. 22, 23, 24	In force	Notify the public and applicants that accommodation is available in recruitment, and notify an applicant selected for an assessment process that accommodation is available on request.	Agency. H-01, H-02
AODA and IASR, s. 14	1 Jan 2021	Internet websites and web content of a large organisation to conform to WCAG 2.0 Level AA.	Agency. H-05
Workplace Safety and Insurance Act, s. 83	In force	No reprisal against a worker by reason of a claim. Relevant to the exclusion of injury and compensation history as an assessment criterion.	Both. C-02

5.2.1

The definition of artificial intelligence and its consequences

Section 8.4 turns on the definition adopted by O. Reg. 476/24. It is set out in full because the scope of the obligation depends on it.

"a machine-based system that, for explicit or implicit objectives, infers from the input it receives in order to generate outputs such as predictions, content, recommendations or decisions that can influence physical or virtual environments."

O. Reg. 476/24, Rules and Exemptions re Job Postings

The definition contains no materiality threshold, no autonomy threshold and no exception. It is not confined to machine learning and it is not confined to systems whose reasoning is opaque. A deterministic computation applied to values inferred from a transcript is a machine-based system generating a recommendation and falls within it. The words screen, assess and select are not defined in the ESA or in the regulation, and the Ministry of Labour has published no guidance on them.

The reporting entity has resolved that ambiguity against itself. It does not contend that résumé extraction is mere extraction, or that a recommendation is not a selection. The platform is designed on the basis that its résumé extraction, its prescreen, its rubric scoring and its dispatch ordering are all within the definition, and the disclosure controls at domain A are applied to all four. Section 8.4 binds the employer publishing the posting. Control A-02 addresses the dependency by recording, for each posting, which functions of the platform are enabled, so that the agency discloses what is in fact used rather than an estimate of it.

5.2.2

Section 23 of the Code

Section 23(2) prohibits the use of any application form or written or oral inquiry that directly or indirectly classifies an applicant as a member of a protected group. A scripted automated interview is an oral inquiry. Section 11 makes a neutral requirement unlawful where it excludes a protected group and is not shown to be reasonable and bona fide, importing the accommodation standard. Section 17 provides that no person may be found incapable by reason of disability unless their needs cannot be accommodated without undue hardship.

Three consequences follow, and they are addressed at domain C rather than at the scoring layer. First, liability attaches at the moment the inquiry is made, whether or not the answer is scored and whether or not the candidate is refused. Second, the word indirectly reaches criteria that correlate with a protected ground irrespective of intent. Third, because an agency may author its own rubric, an agency may author a criterion that offends the Code, so the constraint is enforced against the agency's rubric and not only against the templates supplied by the reporting entity.

5.3

British Columbia

British Columbia has no statute governing artificial intelligence. Its private sector privacy statute covers employee personal information, which federal law does not for a provincially regulated employer, and its human rights statute attaches liability to an employment agency for a refusal to refer.

Table 5.3 British Columbia requirements assessed

INSTRUMENT AND PROVISION	REQUIREMENT	BINDS AND CONTROLS
PIPA, ss. 13(3), 16(3), 19(3)SBC 2003, c. 63	Notify the individual that employment personal information will be collected, used or disclosed, and of the purposes, before doing so.	Both. A-03, B-01
PIPA, s. 35	Where personal information has been used to make a decision that directly affects an individual, retain it for at least one year so that the individual has a reasonable opportunity to obtain access.	Both. G-02
PIPA, s. 23	On request, provide the individual with the personal information, an account of the use made of it, and the names of those to whom it was disclosed.	Both. E-01, E-02
PIPA, ss. 4, 34	Designate a person responsible for compliance and adopt policies. Protect personal information by making reasonable security arrangements.	Both. F-01 to F-06, J-01

INSTRUMENT AND PROVISION	REQUIREMENT	BINDS AND CONTROLS
Human Rights Code, s. 11RSBC 1996, c. 210	No employment advertisement expressing a limitation, specification or preference on a protected ground absent a bona fide occupational requirement.	Agency. A-06, C-03
Human Rights Code, s. 13(2)	An employment agency must not refuse to refer a person for employment for any reason mentioned in subsection 13(1).	Agency. C-06
Employment Standards Act, s. 12 and BC Reg 396/95, Part 2	An employment agency must be licensed.	Agency. J-06
Pay Transparency Act, SBC 2023, c. 18	State the expected pay or pay range in every publicly advertised job opportunity. Do not ask an applicant about pay history.	Agency. A-06, C-04

5.3.1

Refusal to refer

Section 13(2) does not require a hiring decision. It attaches liability to an employment agency for a refusal to refer a person for employment on a protected ground. A dispatch ordering that systematically places a class of workers at the bottom of every list is, in substance, a series of refusals to refer, and it produces no posting and no interview against which the question can be raised. Dispatch ordering is accordingly treated as an assessment surface for the purposes of this report and is within the scope of domain C. The reliability statistic on which the ordering is computed is derived from the individual worker's own record of attending shifts they accepted, with time decay and a credibility adjustment for a short history. It takes no demographic input.

Section 5.3 also produces two product constraints specific to British Columbia. Because the Pay Transparency Act prohibits asking an applicant about pay history, prior compensation is not surfaced or extracted for a British Columbia posting. Because section 11 governs advertisements rather than conversations, a generated posting is checked separately from a rubric.

5.4

Alberta**Table 5.4** Alberta requirements assessed

INSTRUMENT AND PROVISION	REQUIREMENT	BINDS AND CONTROLS
Human Rights Act, s. 8(1)RSA 2000, c. A-25.5	No application form, advertisement or written or oral inquiry of an applicant that expresses directly or indirectly a limitation on a protected ground, or that requires an applicant to furnish information concerning one.	Both. C-01, C-02, C-05
Human Rights Act, ss. 7, 11	No discrimination in employment or in any term or condition of employment. Bona fide occupational requirement preserved.	Agency. C-03, C-06
PIPA, ss. 15, 18, 21SA 2003, c. P-6.5	Personal employee information may be collected, used and disclosed without consent where reasonable for the employment relationship, but only after notice of the fact and the purposes. Recruitment is within the contemplated purposes.	Both. A-03, B-01
PIPA, s. 34.1	Report to the Commissioner, without unreasonable delay, an incident involving loss of or unauthorised access to or disclosure of personal information where a reasonable person would consider that a real risk of significant harm exists.	Both. J-04
PIPA, ss. 5, 13, 24, 34, 35	Accountability for information handled by a service provider. Notice of purposes. Access. Reasonable security arrangements. Retention and destruction.	Both. E-01, F-01 to F-06, G-01, J-03
Employment Agency Business Licensing Regulation, Alta Reg 45/2012	An employment agency business must be licensed. No fee may be charged to the person seeking employment.	Agency. J-06

5.4.1

Section 8(1) and the point at which liability attaches

"No person shall use or circulate any form of application for employment or publish any advertisement in connection with employment or prospective employment or make any written or oral inquiry of an applicant (a) that expresses either directly or indirectly any limitation, specification or preference indicating discrimination on the basis of [a protected ground] of that person, or (b) that requires an applicant to furnish any information concerning [a protected ground]."

Alberta Human Rights Act, s. 8(1)

Section 8(1) is not confined to advertisements. It reaches any written or oral inquiry of an applicant. An automated interview is an oral inquiry and a text message is a written one. The contravention is complete when the question is asked. It does not depend on the answer being scored, and it does not depend on the candidate being refused. This is the provision that determines where the human rights controls sit in the architecture, and it is the reason they sit at the question layer at domain C rather than at the scoring layer.

Alberta protects source of income as a ground. Manitoba protects social disadvantage. New Brunswick and Quebec protect social condition. These are the grounds a rubric most readily offends without intending to, through criteria touching address, income stability, benefits history or gaps in employment. They are treated as protected characteristics by control C-01.

5.5

Quebec

Quebec imposes the strictest requirements in Canada in respect of automated decisions, cross-border processing and biometric information, and imposes language obligations that reach every message an automated recruiter sends. It is accordingly the jurisdiction to which the platform is designed.

Table 5.5 Quebec requirements assessed

INSTRUMENT AND PROVISION	REQUIREMENT	BINDS AND CONTROLS
Law 25, s. 12.1CQLR c. P-39.1	Inform the individual, no later than at the time the decision is communicated, that it is based exclusively on automated processing. On request, disclose the personal information used, the reasons and the principal factors and parameters, and the right to correction. Afford the opportunity to submit observations to a member of personnel in a position to review the decision.	Both. A-05, D-02, E-03, E-04
Law 25, s. 17	Conduct a privacy impact assessment before communicating personal information outside Quebec, including where processing is entrusted to a person outside Quebec, and record the arrangement in a written agreement.	Both. F-06
Law 25, ss. 3.1, 3.3, 3.5, 8.2, 14, 27	Publish the privacy officer's title and contact details. Conduct an assessment for a new information system. Notify the CAI and affected individuals of a confidentiality incident presenting a risk of serious injury. Publish a clear policy. Obtain clear, free and informed consent for specific purposes. Provide portability.	Both. A-04, B-01, E-02, J-01, J-04
Act to establish a legal framework for information technology, ss. 44, 45CQLR c. C-1.1	Express consent and prior disclosure to the CAI for biometric verification. A database of biometric characteristics must be declared to the CAI not later than 60 days before it is brought into service.	Both. Section 8, exclusions 1 and 2.
Charter of human rights and freedoms, ss. 10, 16, 18.1, 20CQLR c. C-12	No requiring information regarding a section 10 ground in an employment application form or employment interview. Grounds include social condition and language. Section 16 reaches the establishment of categories or classes of employment.	Both. C-01, C-02, C-06

INSTRUMENT AND PROVISION	REQUIREMENT	BINDS AND CONTROLS
Regulation respecting personnel placement agencies, CQLR c. N-1.1, r. 0.1	A CNESST licence is required. The licence number must appear on all business documents and advertising. A client may not retain an unlicensed agency.	Agency. J-06
Charter of the French Language, ss. 41, 42, 46CQLR c. C-11	French in written communications with staff and in offers of employment. A posting published in another language must be published in French simultaneously by means of the same nature. A requirement for another language must be justified.	Both. A-07

5.5.1

Section 12.1 and the meaning of exclusively

Section 12.1 is engaged where a decision is based exclusively on automated processing. A decision routed through a person before it is communicated is not exclusively automated, but the provision sets its own standard for what counts as a person: one who is in a position to review the decision. A reviewer without the authority or the information to alter the outcome does not take the decision outside the section.

Three features of the platform are directed to this provision. The review band is fed generously, by the four rules at section 3.3, so that uncertainty produces a person rather than an outcome. The notice under the first limb is proactive, not on request, and accordingly travels in the message that communicates the outcome where the platform is the channel. The explanation under the second limb is producible because the computation is retained rather than reconstructed: the rubric version, each dimension, the captured value, the weight applied, the composite, the threshold and the band are held per candidate.

5.5.2

Section 17 and outsourced processing

Section 17 requires an assessment before personal information is communicated outside Quebec, taking into account the sensitivity of the information, the purposes, the protective measures including contractual ones, and the legal framework of the destination state. The final paragraph extends the section to entrusting a person outside Quebec with collecting, using, communicating or keeping the information, which captures outsourced processing directly. A single prescreen call involves four such destinations, being telephony, speech recognition, model inference and storage. Control F-06 addresses this by maintaining a standing assessment package enumerating every subprocessor, every destination and the safeguards applied, refreshed on any change to the subprocessor list.

5.6

Saskatchewan, Manitoba, Atlantic Canada and the territories

In the remaining ten jurisdictions there is no private sector privacy statute and no statute governing artificial intelligence. PIPEDA governs the data. Human rights legislation governs the questions, in terms addressed at section 5.7. Four jurisdictions impose obligations on the content of a job posting.

Table 5.6 Remaining provinces and territories

JURISDICTION	PRIVACY	PRE-EMPLOYMENT INQUIRY PROVISION	OTHER REQUIREMENT ASSESSED
Saskatchewan	PIPEDA	Human Rights Code, 2018, s. 19; s. 16 employment	Employment Act, s. 2-5, no fee to a job seeker.
Manitoba	PIPEDA	Human Rights Code, s. 14(4); s. 14(3) advertising; s. 18 statements	Grounds include social disadvantage and political belief. No pay transparency statute is in force.
Nova Scotia	PIPEDA	Human Rights Act, s. 8(2); s. 8(1) binds employment agencies directly	Pay history inquiry prohibited under the Labour Standards Code. No posting pay requirement.

JURISDICTION	PRIVACY	PRE-EMPLOYMENT INQUIRY PROVISION	OTHER REQUIREMENT ASSESSED
New Brunswick	PIPEDA	Human Rights Act, s. 4(4)	Sixteen grounds including social condition.
Prince Edward Island	PIPEDA	Human Rights Act, s. 6(1); s. 6(3) advertisements	Employment Standards Act, ss. 5.8 to 5.10, in force 1 June 2022: pay or range in any external posting advertised to the public in any manner, and no pay history inquiry. No employee count threshold.
Newfoundland and Labrador	PIPEDA	Human Rights Act, 2010, s. 14(5)	Pay Equity and Pay Transparency Act passed 2022. Transparency provisions not proclaimed. Recorded at section 10.2.
Northwest Territories	PIPEDA	Human Rights Act, s. 8; s. 7 employment	No agency licensing regime identified.
Nunavut	PIPEDA	Human Rights Act, s. 10(1); s. 9(1) employment	No agency licensing regime identified.
Yukon	PIPEDA	No dedicated inquiry provision. Human Rights Act, s. 9(b), prohibits discrimination in connection with any aspect of employment or application for employment.	A compliance matrix keyed to the presence of an inquiry provision will record Yukon as unregulated. It is not. The broader wording carries the requirement.

PIPEDA applies to employee personal information only in respect of a federal work, undertaking or business. A provincially regulated staffing agency in these jurisdictions, and in Ontario, is accordingly subject to no private sector privacy statute in respect of the records of its own employees. That gap has not been treated as a reduction in the applicable standard. The controls at domains E, F and G are operated uniformly in every jurisdiction, at the level required by the strictest of them.

5.7

The pre-employment inquiry: a requirement common to ten jurisdictions

Ontario, Alberta, Saskatchewan, Manitoba, Nova Scotia, New Brunswick, Newfoundland and Labrador, the Northwest Territories, Nunavut and Quebec each prohibit, in substantially the same words, the use of an application form, an advertisement, or a written or oral inquiry that expresses a limitation based on a protected ground or requires an applicant to furnish information about one. British Columbia reaches the same result through section 11 for advertisements and section 13 for the conduct of an employment agency. Yukon reaches it through the broader wording of section 9(b).

These provisions were drafted for a recruiter with an application form. They are drafted widely enough to reach a recruiter implemented in software, and they require no amendment to do so. Three features of the drafting determine the design of the controls at domain C.

- The contravention is the inquiry, not the outcome. A system that excludes protected grounds from its scoring but permits a prohibited question to reach a candidate has already contravened the provision.
- The words directly or indirectly, and the adverse effect doctrine settled in *Ontario (Human Rights Commission) v. Simpsons-Sears Ltd.*, [1985] 2 S.C.R. 536, mean that intent is irrelevant. A criterion that correlates with a protected ground is exposed however it was authored.
- A candidate volunteers protected ground information in free text. A transcript records it. A scoring pass that reads the raw transcript has therefore classified the applicant indirectly even though no question was asked. This is addressed by control C-05 and by observation OBS-2026-01 at section 7.3.

6 Control activities, procedures performed and results

This section states, for each of fifty-two controls, the control activity, the procedure performed to assess it, and the result of that procedure. The vocabulary of the result column is fixed by section 4.3 and takes no other values.

A control activity is stated in the present tense, with the responsible actor and, where the control operates periodically, the frequency. A procedure is stated in the past tense and records what it was directed to determine. Where a matter is carried to the findings register, the result names the finding.

6.1 Domain A. Disclosure and notice

Domain A addresses section 8.4 of the ESA, section 12.1 of Law 25 in its first limb, the notice requirements of British Columbia PIPA sections 13(3), 16(3) and 19(3) and Alberta PIPA sections 15, 18 and 21, the openness principle in Schedule 1 of PIPEDA, section 8.2 of Law 25, the posting content requirements of five provinces, and sections 41, 42 and 46 of the Charter of the French Language.

Table 6.1 Domain A. Disclosure and notice

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
A-01	Before any question is put to a candidate, the platform reads a disclosure selected for the jurisdiction of the posting. The disclosure states that the interview is conducted by an artificial intelligence recruiter, that the call is recorded and transcribed, the purpose for which it is recorded, and that accommodation is available on request. The wording is fixed per jurisdiction and is not generated.	Inspected the jurisdiction configuration files and the disclosure text for each jurisdiction. Inspected the automated test that asserts the wording and altered the wording in a working copy to confirm that the test fails. Observed the disclosure being read in full on eight test calls across four jurisdiction settings.	No exceptions noted
A-02	Disclosure wording drawn from the statutory language of section 8.4 of the ESA is supplied to the agency for inclusion in a publicly advertised job posting, together with a record of which assessment functions of the platform are enabled for that agency.	Inquired of product personnel as to the manner in which the wording is supplied. Inspected the automation settings held per agency and confirmed that each assessment function is separately recorded and readable.	No exceptions noted
A-03	Notice of the collection of personal information and of the purposes of that collection is given before the information is collected, and not afterwards.	Inspected the order of operations in the call handler to determine whether the disclosure precedes the commencement of recording. Re-performed the sequence on a test call and inspected the resulting record to determine the time at which recording began relative to the disclosure.	No exceptions noted
A-04	A privacy notice is published stating the categories of personal information collected, the purposes, the retention periods, the named subprocessors, the fact that information is processed in the United States, and that it may be accessible to the authorities of that jurisdiction. The notice states the right to ask about automated processing and the escalation route to the privacy commissioners.	Inspected the published notice as at the close of the period. Compared the subprocessor list in the notice against the model, telephony, speech and infrastructure providers configured in the platform to determine whether the published list was complete.	No exceptions noted

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
A-05	Where the platform is the channel by which an outcome is communicated to a candidate in Quebec, the message states that the outcome was produced by automated processing and how to request the information described at section 12.1 of Law 25.	Inspected the message templates configured for the Quebec jurisdiction setting.	Implemented, not yet tested
A-06	Where the platform generates or distributes a job posting, the fields required by the jurisdiction in which the work is performed are treated as required fields. These include expected compensation or a range, whether the vacancy currently exists, and, in Quebec, the licence number of the agency.	Inspected the posting record schema and the jurisdiction rules applied to it. Inquired of product personnel as to the treatment of a posting for which a required field is not supplied.	No exceptions noted
A-07	For a Quebec deployment, French is the default language of the spoken disclosure, the consent turn, the interview, voicemail and text message templates. Another language is used only on a recorded request.	Inspected the language configuration for the Quebec jurisdiction setting and the template set associated with it.	Implemented, not yet tested
A-08	At the point of application, the candidate is informed that artificial intelligence is used in screening and assessment, before any personal information is submitted.	Inspected the application portal review step and the notices presented within it.	Exception noted. The portal presents a layered privacy notice and records an express consent to be contacted. It does not state that artificial intelligence is used in screening or assessment. See finding F-2026-01.

Controls A-05 and A-07 are recorded as implemented and not yet tested because no Quebec deployment was live during the assessment period. No conclusion on their operating effectiveness is expressed.

6.2 Domain B. Consent

Domain B addresses the consent principle in Schedule 1 of PIPEDA, the guidance of the Office of the Privacy Commissioner on meaningful consent, section 14 of Law 25, and the recording consent position applicable in each jurisdiction.

Table 6.2 Domain B. Consent

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
B-01	Consent to the recording of the call and to the conduct of the interview by artificial intelligence is requested, and the request is separate from any other consent. The recording consent model applied is that of the jurisdiction, two party consent being applied in Ontario and British Columbia.	Inspected the consent turn and the jurisdiction configuration governing the recording consent model. Observed the consent request being put on eight test calls.	No exceptions noted
B-02	The speech recognition stream is buffered and withheld from the interview model until the consent turn resolves, so that the interview cannot be conducted before consent is given.	Inspected the consent gate and the point at which the transcription stream is released to the interview model. Re-performed the sequence with the gate disabled in a working copy to confirm that the guard is load bearing and that the automated test covering it fails when it is removed.	No exceptions noted

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
B-03	Consent is resolved by a deterministic phrase table in the first instance. Where the phrase table does not resolve the answer, a model is used, subject to a confidence floor below which the answer is treated as unclear rather than as consent. Keypad entry is offered as an alternative to speech. Silence produces one re-prompt and is then treated as a decline.	Inspected the phrase table, the confidence floor and the fallback sequence. Observed each of the four paths on test calls, being a spoken yes, a spoken no, silence, and keypad entry.	No exceptions noted
B-04	Each step of the consent turn is logged with the utterance, the resolved intent, the confidence, the source of the resolution and the time. Consent to recording and the giving of the artificial intelligence disclosure are timestamped onto the candidate record.	Inspected the log written by the consent state machine and the fields written to the candidate record. Inspected the records produced by the eight test calls to determine whether each step was recorded.	No exceptions noted

6.3 Domain C. Assessment criteria and non-discrimination

Domain C addresses the requirement common to ten jurisdictions described at section 5.7, together with section 11 of the Ontario Code, section 13(2) of the British Columbia Code, section 16 of the Quebec Charter, section 8.3 of the ESA and the pay history prohibitions in British Columbia, Prince Edward Island and Nova Scotia.

Table 6.3 Domain C. Assessment criteria and non-discrimination

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
C-01	Every rubric carries a list of questions that may not be asked in the jurisdiction concerned. The list covers criminal record, age, family status, religion, and injury and workers' compensation history, with jurisdiction specific additions including pre-offer criminal record inquiry in Ontario and Alberta. The list applies to a rubric authored by an agency and not only to a template supplied by the reporting entity.	Inspected the disallowed question lists held on each packaged rubric and on the custom rubric path. Inquired of engineering personnel as to the point at which the list is applied. Inspected a rubric uploaded by an agency to determine whether the list attached to it.	No exceptions noted
C-02	Prior injury and workers' compensation history are excluded from adverse treatment by name, on the authority of the Ontario Human Rights Code and section 83 of the Workplace Safety and Insurance Act.	Inspected the red flag definitions and the exclusion recorded against them, together with the authority cited in the source.	No exceptions noted
C-03	Where a model drafts or adapts a question, the instruction forbids any question concerning a protected characteristic, criminal history, age, or Canadian experience. The instruction is covered by an automated test.	Inspected the instructions given to the model in each application that generates a question. Inspected the tests covering those instructions and removed the constraint in a working copy to confirm that the tests fail.	No exceptions noted
C-04	Prior compensation is not extracted from a résumé and is not surfaced, for a posting in a jurisdiction in which a pay history inquiry is prohibited.	Inspected the résumé extraction field set and the posting jurisdiction rules applied to it.	No exceptions noted

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
C-05	A verifier reads the completed transcript after the call and identifies any question that was put notwithstanding controls C-01 and C-03.	Inspected the verifier and the categories it detects. Re-performed the verifier against a constructed transcript containing three prohibited questions to determine whether each was identified.	No exceptions noted
C-06	Dispatch ordering is computed from a reliability statistic derived from the individual worker's own record of attending shifts they accepted, with time decay and a credibility adjustment for a short history. No demographic attribute, and no attribute identified as a proxy for one, is an input.	Inspected the ranking computation and the complete set of its inputs. Re-performed the computation against a constructed population and compared the result.	No exceptions noted
C-07	A periodic statistical review is performed of banding outcomes and dispatch ordering outcomes for disparate effect on a protected group, and the result is reported.	Inquired of the privacy officer as to the performance of the review. Inspected the codebase and the internal documentation for a fairness measurement, adverse impact analysis or subgroup evaluation.	Exception noted. No such review was performed during the period and no mechanism to perform it exists. The controls at C-01 to C-06 operate on the inputs to an assessment and not on the distribution of its outputs. See finding F-2026-03.

No Canadian statute presently requires a bias audit of an employment screening tool. Local Law 144 of the City of New York requires one, and is stated as a benchmark at section 10.3. The matter is recorded as a minor non-conformity rather than as an observation because the joint principles issued by the Canadian privacy commissioners in December 2023 include accuracy as a principle, and because the Human Rights AI Impact Assessment published by the Ontario Human Rights Commission and the Law Commission of Ontario, which the reporting entity has adopted as a criterion, requires testing.

6.4 Domain D. Decision authority

Domain D addresses section 12.1 of Law 25, the four part explainability requirement in the PSC guidance, and the human oversight expectation stated in the joint principles of the Canadian privacy commissioners and in the ISSED Voluntary Code of Conduct.

Table 6.4 Domain D. Decision authority

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
D-01	The platform cannot record a candidate as hired or as active. The transitions into those states are restricted to an operator actor and additionally require an explicit activation command. An application assessment record can express only the values declined or not now, has no field capable of recording an acceptance, and is scoped to a single application.	Inspected the worker state machine, the permitted actors on each transition, and the application assessment schema. Attempted, in a working copy, to effect the transition as an automated actor and confirmed that the attempt is refused. Searched the codebase for any path that writes the hired or active state otherwise than through the state machine.	No exceptions noted
D-02	A candidate who is not advanced may request that the outcome be reviewed by a person at the agency with the authority to change it. On such a request the platform presents the rubric version, the captured answers, the weights applied, the composite score, the threshold and the band, so that the reviewer is equipped to alter the outcome.	Inquired of the privacy officer as to the operation of the review path. Inspected the record presented to the reviewer to determine whether it contains each element required by section 12.1 of Law 25. Inspected the published notice to determine whether the right is stated.	No exceptions noted

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
D-03	Uncertainty resolves to the review band. An unanswered or unclear dimension routes to review. A red flag caps the outcome at review and can never produce the qualified band. Where no band matches, the fallback is review.	Re-performed the scoring computation against four constructed cases, being an unanswered dimension, an unclear dimension, a red flag with a high composite score, and a composite score falling outside every configured band. Compared the band produced in each case against the rule stated.	No exceptions noted
D-04	An identity match that is high in similarity but not certain is held and routed to a person at the agency. The platform performs no automatic merge of candidate records.	Inspected the identity resolution threshold and the review queue to which an ambiguous match is routed. Re-performed the resolution against a constructed pair above and below the threshold.	No exceptions noted

6.5 Domain E. Rights of the individual

Domain E addresses the individual access and challenging compliance principles in Schedule 1 of PIPEDA, section 23 of British Columbia PIPA, section 24 of Alberta PIPA, sections 12.1 and 27 of Law 25, and section 8.6 of the ESA.

Table 6.5 Domain E. Rights of the individual

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
E-01	Every category of personal information held by the platform is entered in a registry, and each entry carries a paired export adapter and erasure adapter. Both the export path and the erasure path iterate the same registry.	Inspected the registry and confirmed that each entry carries both adapters. Compared the registry against the database schema to determine whether any table holding personal information was absent from it.	No exceptions noted
E-02	A test in the continuous integration pipeline fails the build where a table holding personal information is introduced without a corresponding registry entry.	Inspected the completeness test. Introduced an unregistered table holding personal information in a working copy and confirmed that the build fails.	No exceptions noted
E-03	The receipt issued on a request does not silently omit. A record retained under a statutory payroll or employment standards obligation is stated on the receipt as a recorded lawful exception together with the obligation relied on. A deletion requested of a subprocessor but not yet confirmed is stated as pending and not as completed. A social insurance number is exported as the last four digits only.	Re-performed an export and an erasure against a constructed candidate record containing a retained payroll record and a recording held by a subprocessor. Inspected the receipts produced.	No exceptions noted
E-04	For each assessment, the platform retains the rubric version, each dimension, the value captured for it and the confidence recorded, the weight applied, the composite score, the threshold and the band, so that the reasons and the principal factors and parameters can be produced on request without reconstruction.	Inspected the assessment record schema and the fields written by the scoring path. Re-performed the computation from the retained record for three candidates and compared the result against the band recorded at the time.	No exceptions noted
E-05	A published response commitment of 30 days applies to a request, and the escalation route to the Office of the Privacy Commissioner of Canada and to the provincial commissioners is stated in the published notice.	Inspected the published notice. Inquired of the privacy officer as to requests received during the period and the time taken to respond to each.	Non-occurrence

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
E-06	The platform records the date of the last interview for each candidate and makes the interviewed population and that date available to the agency, for the purpose of the notification required by section 8.6 of the ESA within 45 days.	Inspected the interview record and the fields available to the agency. Inquired of product personnel as to the manner in which the population is presented.	No exceptions noted

Control E-05 is recorded as a non-occurrence. No request by an individual to exercise a right was received during the assessment period. The mechanism was tested at E-01, E-03 and E-04 by re-performance against constructed records. No conclusion is expressed on the operating effectiveness of the response commitment itself. The obligation on the agency to notify an interviewed applicant within 45 days is recorded at Appendix C, item 5.

6.6 Domain F. Safeguarding of personal information

Domain F addresses the safeguards principle in Schedule 1 of PIPEDA, section 34 of British Columbia PIPA, section 34 of Alberta PIPA, and section 17 of Law 25.

Table 6.6 Domain F. Safeguarding of personal information

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
F-01	Sensitive fields, being the social insurance number reference, date of birth and address, are encrypted at rest under AES-256-GCM envelope encryption. Each value carries its own nonce. The data key is wrapped by a key held in a managed key vault and the envelope pins the key version.	Inspected the encryption implementation, the fields to which it is applied and the key wrapping arrangement. Inspected stored values to confirm that the plaintext is not present.	No exceptions noted
F-02	The envelope binds the tenant, table, row and field as additional authenticated data, so that an envelope taken from one row cannot be decrypted in another.	Re-performed a decryption after transposing an envelope between two rows in a working copy and confirmed that the decryption fails.	No exceptions noted
F-03	Separation between agencies is enforced by row level security in the database, armed for each request from the authenticated context. The tenant identifier is included in cache keys. Scheduled processes operate under the same armed session and not under a privileged bypass.	Inspected the row level security policies and the point at which the session is armed. Attempted, under an armed session, to read a record belonging to another agency and confirmed that the attempt returns nothing.	No exceptions noted
F-04	Authorisation is governed by a declarative policy covering eleven roles, with read and write access separated by method. The policy is verified by an exhaustive matrix test in the continuous integration pipeline.	Inspected the policy and the matrix test. Widened a permission in a working copy and confirmed that the test fails.	No exceptions noted
F-05	A read of a worker record writes an append only audit entry carrying the actor and a stated purpose. Every gateway route capable of reaching personal information declares the purpose for which it reads.	Inspected the audit writer and the routes that read personal information. Performed a read of a worker record and inspected the resulting audit entry. Searched for a route reaching personal information without a declared purpose.	No exceptions noted
F-06	An assessment package is maintained enumerating every subprocessor, the destination of the processing, the safeguards applied and the contractual terms in place, for the purposes of clause 4.1.3 of Schedule 1 to PIPEDA and section 17 of Law 25. The package is refreshed on any change to the subprocessor list.	Inspected the package as at the close of the period. Compared the subprocessors listed against those configured in the platform. Inquired of the privacy officer as to the process on a change.	No exceptions noted

6.7 Domain G. Retention and disposal

Table 6.7 Domain G. Retention and disposal

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
G-01	Retention is enforced by scheduled deletion. Abandoned application drafts are cleared at 30 days, sealed applications at one year, and raw inbound channel payloads and internal event records on their own shorter schedules. Deletion cascades to quarantined documents and to the stored bytes and not only to the record referring to them.	Inspected the schedules configured in the production environment and the processes that enforce them. Re-performed a deletion against a constructed record and confirmed that the underlying stored object was removed.	No exceptions noted
G-02	Where personal information has been used to produce a band, it is retained for not less than one year, so that the individual has a reasonable opportunity to obtain access as required by section 35 of British Columbia PIPA and so that the explanation at control E-04 remains producible.	Inspected the retention schedule applied to a sealed application and to the assessment record associated with it, and compared it against the statutory minimum.	No exceptions noted
G-03	Records of a publicly advertised job posting, including each version, the associated application form and the notifications sent to interviewed applicants, are retained for not less than three years as required by sections 15(7.1) and 15(7.1.1) of the ESA.	Inspected the retention schedule applied to posting records and compared it against the statutory minimum.	Exception noted. Posting records are governed by the general application retention schedule and are not separately configured to the three year period. See finding F-2026-04.

6.8 Domain H. Accessibility and accommodation

Domain H addresses sections 22, 23 and 14 of the IASR, section 17 of the Ontario Code, and the duty to accommodate to the point of undue hardship as it applies in every jurisdiction.

Table 6.8 Domain H. Accessibility and accommodation

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
H-01	The offer of accommodation is made in the spoken disclosure, before any question is put, and is expressed in terms rather than by reference to a policy.	Inspected the disclosure wording for each jurisdiction to determine whether the accommodation sentence is present. Observed the sentence being read on eight test calls.	No exceptions noted
H-02	A candidate who requests accommodation, or who requests a person in place of the automated interview, is routed to the agency. The request does not produce an adverse band and does not otherwise count against the candidate.	Observed the accommodation path on a test call. Inspected the record produced to determine whether any adverse value was written.	No exceptions noted
H-03	Keypad entry is available as an alternative to speech at the consent turn, for a candidate who cannot or does not wish to answer by voice.	Observed keypad entry on a test call for each of the two available values.	No exceptions noted
H-04	Non-response is not treated as failure. Silence produces a re-prompt and then a decline. An unclear answer routes to the review band and not to an adverse band.	Re-performed the silence path and the unclear answer path and inspected the outcome recorded in each case.	No exceptions noted

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
H-05	The candidate facing surfaces supplied by the platform, being the application portal, the document collection and onboarding flow and the worker portal, conform to WCAG 2.0 Level AA, and conformance is evidenced.	Inspected the internal interface specification, which states WCAG 2.2 Level AA as the design standard. Inspected the test suite for automated accessibility testing. Inquired of engineering personnel as to any external conformance assessment.	Exception noted. The design standard is stated but conformance is not evidenced. One automated accessibility test was found in the web application and no external assessment has been obtained. See finding F-2026-02.

6.9 Domain I. Electronic messaging

Table 6.9 Domain I. Electronic messaging

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
I-01	Every outbound message identifies the sender and the person on whose behalf it is sent, and provides contact information, without regard to whether an exemption under section 6(6) of CASL is available.	Inspected the message templates and the composition path. Sent a message on each of the four outbound paths and inspected the message as received.	No exceptions noted
I-02	Every outbound message carries an unsubscribe facility, and an unsubscribe is given effect within the 10 business days required by section 11 of CASL.	Inspected the unsubscribe handling. Re-performed an unsubscribe and confirmed that no further message was composed to that recipient.	No exceptions noted
I-03	Messages relating to an application, a shift or an assignment are held separately from any message promoting a service or offering a subscription to job notifications, the latter being the category the CRTC identifies as commercial in a recruitment context.	Inspected the message categories configured in the platform and the paths on which each is composed.	No exceptions noted

6.10 Domain J. Governance and oversight

Table 6.10 Domain J. Governance and oversight

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
J-01	A privacy officer is designated and the role and contact details are published, as required by section 3.1 of Law 25 and by section 4 of British Columbia PIPA.	Inspected the published page and the internal designation.	No exceptions noted
J-02	Model inference is routed by task class to a single approved provider under enterprise terms. A test in the continuous integration pipeline fails the build if any other model provider is introduced anywhere in the codebase.	Inspected the routing and the provider lock test. Introduced a second provider in a working copy and confirmed that the build fails.	No exceptions noted
J-03	Customer and candidate data is not used to train or fine-tune a model, is not sold, and is not disclosed for the commercial purposes of another party. The position is stated in the published notice and in the terms with each model provider.	Inspected the published notice and the terms in force with the model, speech recognition and speech synthesis providers to determine whether each excludes training on the data supplied.	No exceptions noted

REF	CONTROL ACTIVITY	PROCEDURE PERFORMED	RESULT
J-04	An incident is assessed against the real risk of significant harm threshold in section 10.1 of PIPEDA and section 34.1 of Alberta PIPA, and the risk of serious injury threshold in section 3.5 of Law 25. Where the threshold is met, the agency is provided with the facts required for its own report without unreasonable delay.	Inspected the incident procedure and the record of incidents arising during the period.	Non-occurrence
J-05	No representation as to the performance or effectiveness of the platform is published unless supported by an adequate and proper test conducted before the representation is made. No accuracy figure, bias reduction figure or time to fill figure is published.	Inspected the public marketing pages, the security page and this report for a performance representation. Inquired of management as to the substantiation held for any such representation.	No exceptions noted
J-06	The licence held by the agency, where its jurisdiction requires one, is recorded as a field on the agency record at onboarding.	Inspected the agency record schema and the onboarding sequence.	No exceptions noted

Control J-04 is recorded as a non-occurrence. No confidentiality incident meeting any of the three thresholds occurred during the assessment period. The procedure was inspected but its operating effectiveness was not tested. Control J-05 was applied to this report during its preparation, which is why the report contains no percentage and no comparative performance figure.

7 Findings

7.1 Summary of results

Fifty-two controls were assessed. The results are set out in Table 7.1. Four matters were carried to the findings register. None is classified as a major non-conformity. No control in domains B, D, F or I gave rise to an exception, those being the domains addressing consent, decision authority, safeguarding of personal information and electronic messaging.

Table 7.1 Results by domain

DOMAIN	CONTROLS	NO EXCEPTIONS	EXCEPTION NOTED	NOT TESTED	NON-OCCURRENCE
A. Disclosure and notice	8	5	1	2	0
B. Consent	4	4	0	0	0
C. Assessment criteria and non-discrimination	7	6	1	0	0
D. Decision authority	4	4	0	0	0
E. Rights of the individual	6	5	0	0	1
F. Safeguarding of personal information	6	6	0	0	0
G. Retention and disposal	3	2	1	0	0
H. Accessibility and accommodation	5	4	1	0	0
I. Electronic messaging	3	3	0	0	0
J. Governance and oversight	6	5	0	0	1
Total	52	44	4	2	2

A result of not tested or non-occurrence is not a pass. It records that no occurrence arose on which operating effectiveness could be tested, and no conclusion on operating effectiveness is expressed for those four controls. The reasons are stated in the notes to Tables 6.1, 6.5 and 6.10.

Table 7.2 Classification of matters arising

CLASSIFICATION	COUNT	REFERENCE
Major non-conformity	0	None arising.
Minor non-conformity	4	F-2026-01 to F-2026-04, section 7.2.
Observation	4	OBS-2026-01 to OBS-2026-04, section 7.3.
Repeat finding	0	No prior edition exists.

7.2 Findings register

Each finding is stated in three parts: the requirement that applies, the fact observed, and the respect in which the fact falls short of the requirement. Remediation is stated separately and does not qualify the finding. Each finding carries an owner and a target date.

F-2026-01 Disclosure of the use of artificial intelligence is not made at the point of application.

Requirement. Section 8.4 of the ESA requires an employer to disclose in a publicly advertised job posting that artificial intelligence is used to screen, assess or select applicants.

The PSC guidance, adopted as a criterion at section 5.1.2, requires that candidates be told when and how artificial intelligence will be used during a hiring process.

Fact observed. The application portal presents a layered privacy notice and records an express consent to be contacted. It does not state that artificial intelligence is used in screening or assessment. The first statement to that effect reaches the candidate at the commencement of the prescreen call, under control A-01.

Deficiency. A candidate submits personal information before being informed that it will be assessed by an automated system. Where the agency has met its own obligation under section 8.4 in the posting, the platform does not repeat the disclosure at the point at which the information is collected. Where the agency has not, the platform does not compensate.

Classification. Minor non-conformity. The obligation under section 8.4 binds the agency and attaches to the posting rather than to the portal, and control A-02 supplies the agency with the wording. The deficiency is in the platform's own notice.

Remediation. A statement that artificial intelligence is used in screening and assessment, and a short description of the categories of personal information passed to it, to be added to the application portal ahead of the consent step. Owner: Head of Product. Target date: 31 October 2026.

F-2026-02

Conformance of candidate facing surfaces to WCAG 2.0 Level AA is not evidenced.

Requirement. Section 14 of the IASR required the internet websites and web content of a large organisation to conform to WCAG 2.0 Level AA by 1 January 2021. The candidate facing surfaces supplied by the platform are the agency's web content for that purpose. Accessibility compliance reports for organisations of twenty or more employees are due on 31 December 2026.

Fact observed. WCAG 2.2 Level AA is stated as the design standard in the internal interface specification. One automated accessibility test was found in the web application. No external conformance assessment has been obtained, and the internal specification itself records that responsive and accessibility evidence is outstanding.

Deficiency. A design standard that is stated but not measured does not establish conformance. The agency cannot evidence conformance of the surfaces it does not control.

Classification. Minor non-conformity. No instance of a candidate being unable to complete an application was identified during the period, and the accommodation controls at H-01 to H-04 operate independently of this finding.

Remediation. An external accessibility assessment of the application portal, the onboarding flow and the worker portal, and automated conformance testing wired into the continuous integration pipeline so that a regression fails the build. Owner: Head of Engineering. Target date: 31 December 2026.

F-2026-03

No review of assessment outcomes for disparate effect has been performed.

Requirement. Section 11 of the Ontario Code, and its equivalent in every other Canadian jurisdiction, makes a facially neutral requirement unlawful where it has an adverse effect on a protected group and is not shown to be reasonable and bona fide. Intent is irrelevant. The Human Rights AI Impact Assessment published by the Ontario Human Rights Commission and the Law Commission of Ontario, adopted as a criterion, requires testing at design, before external deployment, within 90 days of a material change, and annually.

Fact observed. No statistical review of banding outcomes or dispatch ordering outcomes for disparate effect was performed during the assessment period. No fairness measurement, adverse impact analysis or subgroup evaluation exists in the platform. No demo-

graphic information is collected, which is itself a constraint on performing such a review.

Deficiency. The controls at C-01 to C-06 operate on the inputs to an assessment. They constrain what may be asked and what may be scored. They do not measure the distribution of outcomes, and a criterion that is neutral on its face and lawful in what it asks may still produce an adverse effect that only measurement would reveal.

Classification. Minor non-conformity. No Canadian statute presently requires such a review, and no adverse effect has been identified. The classification reflects the criterion adopted rather than a statutory breach.

Remediation. A methodology for periodic review of banding and dispatch ordering outcomes, designed so that it does not require the collection of demographic information from candidates, followed by a first review and publication of its result. Owner: Privacy officer. Target date: 30 April 2027, with the result published in Edition 02 of this report.

F-2026-04

Retention of job posting records is not separately configured to the statutory period.

Requirement. Sections 15(7.1) and 15(7.1.1) of the ESA require an employer to retain copies of every publicly advertised job posting, the associated application form, every version of the posting, and the information provided to interviewed applicants, for three years after public access to the posting is removed.

Fact observed. Posting records held in the platform are governed by the general application retention schedule described at control G-01. No separate three year schedule is configured for posting records, versions or applicant notifications.

Deficiency. The obligation binds the agency, and the records are held by the platform. A retention schedule shorter than the statutory period would place the agency in breach of an obligation it cannot discharge by its own act.

Classification. Minor non-conformity. The requirement came into force on 1 January 2026, so the earliest date on which a record could be deleted below the statutory floor is 1 January 2029. No record has been lost.

Remediation. A separate retention schedule for posting records, versions, application forms and applicant notifications, set to three years from the removal of public access, taking precedence over the general schedule. Owner: Head of Engineering. Target date: 31 January 2027.

7.3

Matters recorded as observations

The following are not breaches of any binding requirement. Each is recorded because it would strengthen a control, or because it addresses a requirement recorded at section 10 as not yet in force.

Table 7.3 Observations

REF	MATTER	BASIS	OWNER AND TARGET
OBS-2026-01	The scoring pass reads the transcript. Information volunteered by a candidate that relates to a protected ground is therefore present to the scorer even though no question was asked.	Section 5.7, third feature. The words directly or indirectly in the pre-employment inquiry provisions reach indirect classification. Narrowing what the scoring pass sees to the captured dimension values and the answer spans relevant to them would remove the exposure at source.	Head of Engineering. 31 January 2027.

REF	MATTER	BASIS	OWNER AND TARGET
OBS-2026-02	An outcome in the reject band is communicated without a confirming step by a person at the agency. Review is available on request under control D-02 but is not a precondition.	No Canadian statute presently requires a confirming step. Section 12.1 of Law 25 attaches obligations to a decision based exclusively on automated processing, and the report of the Alberta Information and Privacy Commissioner of 28 August 2025 recommends a right to human review. Introducing a confirming step before communication would place the outcome outside section 12.1 altogether.	Head of Product. 31 December 2026.
OBS-2026-03	Retention floors are applied uniformly rather than by jurisdiction. Control G-02 is satisfied in British Columbia because the general one year schedule happens to meet section 35 of PIPA, and not because the jurisdiction is evaluated.	A control that meets a requirement by coincidence will cease to meet it when the general schedule changes for an unrelated reason. Related to finding F-2026-04.	Head of Engineering. 31 January 2027.
OBS-2026-04	The reporting entity holds no third party certification in respect of the matters covered by this report, and no certification pathway has been commenced.	Section 9. CAN/DGSI 101:2025 is a National Standard of Canada scoped to organisations of fewer than 500 employees and is certifiable through a Canadian body. ISO/IEC 42001:2023 is the international equivalent. Certification would replace management assessment with independent assessment.	Privacy officer. Pathway decision by 31 March 2027.

The status of every finding and observation will be restated in Edition 02, and any matter not closed by its target date will be flagged as a repeat and escalated on that basis alone.

8 Capabilities excluded by design

Six capabilities are excluded from the platform as a matter of architecture. Each exclusion removes a category of legal exposure rather than mitigating it. Each was verified by searching the codebase for an implementation, on the basis that an absence which has not been looked for is not a control.

Table 8.1 Excluded capabilities and the exposure each exclusion removes

REF	CAPABILITY EXCLUDED	EXPOSURE REMOVED	VERIFICATION
X-01	Voiceprint, speaker embedding, speaker recognition, or any biometric template.	Sections 44 and 45 of the Act to establish a legal framework for information technology require express consent and prior disclosure to the CAI for biometric verification, and require that a database of biometric characteristics be declared to the CAI not later than 60 days before it is brought into service. The guidance of the Office of the Privacy Commissioner on the processing of biometrics, issued in final form on 11 August 2025, treats biometric information as sensitive and expects express consent, a necessity and proportionality assessment and strict retention limits.	Searched the codebase for an implementation of speaker recognition, voice matching or biometric templating. None found. Speech is converted to text and the text is assessed.
X-02	Inference of emotion, affect, sentiment, stress, enthusiasm, confidence or personality from voice.	Article 5(1)(f) of Regulation (EU) 2024/1689 has prohibited the use of artificial intelligence systems to infer the emotions of a natural person in the workplace since 2 February 2025, and was not affected by the subsequent deferral of the high risk regime. In Canada the exposure is under the duty to accommodate and the disability and place of origin grounds, because what such a system measures is frequently a speech condition, neurodivergence or a first language.	Searched the codebase for affect, sentiment, prosody, emotion and tone analysis. One fixed literal value was found on the shift confirmation path. It is a constant and not a measurement, and it does not operate on the screening path.
X-03	Video capture, facial expression scoring, gaze tracking and appearance assessment.	The PSC guidance gives, as its published example of an inappropriate use of artificial intelligence in hiring, a video interview that scores verbal answers, non-verbal communication and appearance on criteria the candidate is not shown. The Illinois Artificial Intelligence Video Interview Act imposes notice, explanation, consent, sharing and deletion obligations on the analysis of a video interview.	Searched the codebase for video capture and for any facial analysis implementation. None found. The platform has no video path.
X-04	Derivation, estimation or storage of a protected characteristic, and the use of a proxy for one.	The pre-employment inquiry provisions described at section 5.7, and the adverse effect doctrine. Illinois made the use of a postal code as a proxy for a protected class a civil rights violation in its own right with effect from 1 January 2026.	Searched the codebase for the derivation of race, ethnicity, national origin, religion, age, sex, gender identity, disability, family status, marital status and immigration status beyond the work authorisation the role requires. None found. Postal code, name and accent are not inputs to an assessment.
X-05	Use of customer or candidate data to train or fine-tune a model, sale of that data, and disclosure of it for the commercial purposes of another party.	The limiting use, disclosure and retention principle in Schedule 1 of PIPEDA, section 14 of Law 25, and the accountability obligation in respect of a processor under clause 4.1.3.	Control J-03. Inspected the terms in force with each model, speech recognition and speech synthesis provider. Model routing is locked to a single provider by a test that fails the build if another is introduced, which is what makes the published subprocessor list complete.

REF	CAPABILITY EXCLUDED	EXPOSURE REMOVED	VERIFICATION
X-06	Publication of a certification the reporting entity does not hold, or of a performance figure not supported by a prior test.	Section 74.01(1)(b) of the Competition Act, under which the burden of substantiation rests on the advertiser and the test must precede the claim. Civil penalties for a corporation reach the greater of \$10 million, three times the benefit derived, or 3 per cent of annual worldwide gross revenues.	Control J-05. Certification badges and unverifiable assurances were removed from the public security page. This report states at section 1 that no certification is held and contains no percentage or comparative performance figure.

A change to any of exclusions X-01 to X-04 would alter the legal position described in this report materially. Any such change will be recorded in the edition of this report published before the capability is released, and not afterwards.

9 Conformance with voluntary standards

The standards in Table 9.1 are not binding. They are the instruments against which a purchaser, an insurer or a regulator is most likely to measure a system of this kind, and the reporting entity has assessed the platform against each internally. The column headed Status states the position without qualification. Where certification exists and is not held, the table says so.

Table 9.1 Voluntary standards and frameworks

STANDARD	CERTIFIABLE	APPLICATION TO THE PLATFORM	STATUS
CAN/DGSI 101:2025 Ethical design and use of artificial intelligence by small and medium organizations. National Standard of Canada. Supersedes CAN/CIOSC 101:2019.	Yes, through the Digital Governance Council validation and verification programme	The primary Canadian benchmark. Scoped to organisations of fewer than 500 employees, which describes both the reporting entity and the agencies using the platform, and expressly covers artificial intelligence procured from a third party, so that part of an agency's conformance follows from its supplier's position.	Assessed internally against the standard. Not certified. See OBS-2026-04.
ISO/IEC 42001:2023 Artificial intelligence management systems	Yes	Thirty-eight Annex A controls covering policy, impact assessment, lifecycle, data governance, information to interested parties, responsible use and third party relationships. The governance arrangements at section 10.4 are structured to it.	Assessed internally. Not certified.
ISO/IEC 42005:2025 Artificial intelligence system impact assessment	No, guidance	The operational companion to the impact assessment control in ISO/IEC 42001, and the closest international analogue to the Human Rights AI Impact Assessment adopted at section 5.2.	Applied as guidance.
NIST AI Risk Management Framework 1.0, with the Generative AI Profile (NIST AI 600-1)	No, voluntary	The four functions, being govern, map, measure and manage, and the seven characteristics of trustworthy artificial intelligence. Finding F-2026-03 is a gap against the measure function.	Applied as a framework. Gap recorded at F-2026-03.
Joint principles for responsible, trustworthy and privacy-protective generative artificial intelligence technologies Federal, provincial and territorial privacy commissioners, December 2023	No, guidance	Nine principles, being legal authority and consent, appropriate purposes, necessity and proportionality, openness, accountability, individual access, limiting collection, accuracy and safeguards. Signed by every Canadian privacy regulator and accordingly the most authoritative statement of regulatory expectation in Canada.	Adopted as a criterion. Domains B, E and F are structured to it.
Treasury Board Algorithmic Impact Assessment	No, government instrument	A questionnaire of 106 items producing an impact level from I to IV. Binding on federal institutions only. Adopted voluntarily as an internal design instrument.	Adopted as an internal instrument.
Public Service Commission of Canada, <i>Artificial intelligence in the hiring process</i>	No, guidance	Requires that a hiring manager be able to explain the role the tool played, the criteria data or mechanisms it used, the assessment performed for each candidate, and how the output was interpreted. Section 9.1 addresses each.	Adopted as a criterion. Addressed at section 9.1.
ISED Voluntary Code of Conduct on the Responsible Development and Management of Advanced Generative AI Systems	No, voluntary	Six principles, being accountability, safety, fairness and equity, transparency, human oversight and monitoring, and validity and robustness. The reporting entity is a deployer rather than a developer of frontier systems.	Not a signatory. Deployer measures applied.

STANDARD	CERTIFIABLE	APPLICATION TO THE PLATFORM	STATUS
OECD AI Principles, 2019, updated 2024	No, adherent state	Definitional as much as substantive. The OECD definition of an artificial intelligence system is the definition tracked by both O. Reg. 476/24 and Regulation (EU) 2024/1689, so a single scoping vocabulary serves three regimes.	Applied as the scoping definition.

9.1

The explainability requirement in the PSC guidance

The PSC guidance permits the use of an artificial intelligence tool to assess candidates only if the hiring manager can explain four matters. Each is addressed below by reference to the control that produces the explanation. The guidance binds federal hiring managers and not the agencies using the platform; it is adopted because it is the most specific published statement by a Canadian government body of what an explanation must contain.

Table 9.2 The four matters that must be explicable

MATTER	BASIS ON WHICH IT CAN BE EXPLAINED	CONTROLS
The role the tool played in the decision process	The platform conducts the structured first round screen and computes a band against the agency's rubric. It cannot record a hire, cannot express an acceptance and cannot set pay. The boundary is a property of the worker state machine and of the application assessment schema.	D-01, section 3.2
The criteria, data or mechanisms used to assess the answers	The criteria are the agency's rubric. The data are the candidate's own answers, captured as discrete values. The mechanism is a weighted sum against thresholds stated by the agency. A rubric uploaded by an agency does not score until a person has assigned the weights.	C-01, E-04, section 3.3
The assessment performed for each candidate	Retained per candidate, not reconstructed: rubric version, each dimension, the captured value and its confidence, the weight applied, the composite score, the threshold and the band.	E-04
How the output was interpreted and used	This matter belongs to the agency. The platform produces three bands rather than a ranked list of individuals, routes uncertainty to a person, records an actor against every action, and records an actor and a stated purpose against every read of a worker record.	D-03, F-05, Appendix C

The guidance also gives two examples of inappropriate use. The first is a résumé ranker applying non-transparent criteria in which each candidate receives a score based on unknown parameters and recruiters interpret those scores without understanding the mechanism. The second is the video interview described at exclusion X-03. The platform is designed against both. The residual risk under the first example is that the agency does not read the rubric it has adopted, which is addressed at Appendix C, item 3.

10

Requirements not yet in force, and review

No requirement in this section was in force during the assessment period. None is assessed and no control is claimed against any of them. Each is recorded because it is reasonably likely to affect the platform, and because a reader is entitled to know what the reporting entity is tracking.

10.1

Federal

Table 10.1 Federal instruments not in force

INSTRUMENT	STATUS	EFFECT IF ENACTED	PRESENT POSITION
Bill C-36, Protecting Privacy and Consumer Data Act	First reading, 15 June 2026. Not in force.	Would repeal and replace the privacy provisions of PIPEDA. An organisation using an automated decision system would be required to provide, on request, an explanation of the prediction, recommendation or decision, and to disclose publicly that it uses one. A privacy impact assessment would become mandatory before any transfer of personal information outside Canada. Administrative monetary penalties would rise to the greater of \$10 million or 3 per cent of gross global revenue.	The explanation is producible under control E-04. The transfer assessment is maintained under control F-06. Two previous attempts at this reform were not enacted.
Artificial Intelligence and Data Act, Bill C-27, Part 3	Died on the Order Paper, January 2025. Not reintroduced.	Would have imposed risk assessment, record keeping, public disclosure and human oversight obligations on high impact systems. Employment was the first class named in the proposed schedule.	No obligation arises. Recorded because it is frequently cited as though it were law.
Employment Equity Act reform	Recommended December 2023. No amending bill introduced.	187 task force recommendations including two additional designated groups. Would bring an artificial intelligence screening tool within an employment systems review.	Relevant only where an agency places workers with a federally regulated employer. Outside the boundary at section 2.4(e).

10.2

Provincial

Table 10.2 Provincial instruments not in force

INSTRUMENT	STATUS	EFFECT IF ENACTED	PRESENT POSITION
Nova Scotia Bill 234, Helping Working People Get Ahead Act	First reading, 6 March 2026. A private member's bill.	Would go further than section 8.4 of the ESA. Where artificial intelligence screens or ranks candidates, the employer would be required to state that in the posting, explain the purpose, and specify what personal information is passed to the artificial intelligence system, together with posting pay and a 45 day candidate notification.	The specification of what personal information is passed is the clearest indication of the direction of disclosure obligations and is the target of the remediation at finding F-2026-01.
Alberta Information and Privacy Commissioner, report on responsible artificial intelligence governance	Report published 28 August 2025. No bill.	Recommends a standalone Alberta artificial intelligence statute and amendments to PIPA requiring advance notice of automated decision-making, transparent algorithmic policies, a right to contest a decision and obtain human review, algorithmic impact assessments for high risk systems, and audit powers for the Commissioner.	Notice is given under controls A-01 and A-03. Human review is available under control D-02. Observation OBS-2026-02 addresses the confirming step. Finding F-2026-03 is the gap against impact assessment.
Alberta PIPA reform	Statutory review completed February 2025. Consultation continuing. No bill.	Twelve recommendations. Scope and timing unknown.	Tracked. No action.

INSTRUMENT	STATUS	EFFECT IF ENACTED	PRESENT POSITION
Manitoba Bill 51, Public Sector Artificial Intelligence and Cybersecurity Governance Act	Royal Assent 1 June 2026. Awaiting proclamation.	Binds public sector entities only. Requires transparency about the use of artificial intelligence, an accountability framework, risk mitigation, and human oversight by an individual.	Does not bind an agency or the reporting entity. The first Canadian statutory articulation of a human oversight duty, and a public sector client would be expected to pass it down.
Ontario Ministry of Labour guidance on section 8.4	Not issued.	Would settle the meaning of screen, assess and select, and the level of detail a disclosure requires.	The conservative reading is applied. See section 5.2.1.
New Brunswick pay transparency legislation; Newfoundland and Labrador Pay Equity and Pay Transparency Act	Introduced 18 March 2026; passed 2022 but transparency provisions not proclaimed.	Would require pay or a range in a public posting and prohibit a pay history inquiry, in two further provinces.	Control A-06 treats posting fields as jurisdiction specific and required. Extension is configuration rather than development.

10.3 International benchmarks

The platform is not marketed or sold outside Canada, and no obligation arises under any of the following. They are recorded because they are the instruments a purchaser is most likely to raise, and because two of them are the reason for exclusions X-02 and X-04.

Table 10.3 International benchmarks

INSTRUMENT	STATUS	RELEVANCE
Regulation (EU) 2024/1689, Article 5(1)(f)	In force since 2 February 2025	Prohibits the use of artificial intelligence systems to infer the emotions of a natural person in the workplace. Not deferred by the subsequent postponement of the high risk regime. Exclusion X-02.
Regulation (EU) 2024/1689, Article 50	Applied from 2 August 2026	Requires that a person be informed that they are interacting with an artificial intelligence system. Control A-01 has operated to that standard since before the article applied.
Regulation (EU) 2024/1689, Annex III point 4 and Chapter III	Deferred to 2 December 2027, subject to formal adoption of the amending instrument	Recruitment and selection are a high risk classification. Obligations would include risk management, data governance and bias examination, technical documentation, logging, transparency to deployers and human oversight. The date should be re-verified before it is relied on.
Local Law 144 of the City of New York	In force since 1 January 2023	The only law in North America that requires a bias audit of an automated employment decision tool by name, together with publication of a summary of the results and ten business days' notice to candidates. The template against which finding F-2026-03 should be read.
Illinois, HB 3773 amending the Human Rights Act, and the Artificial Intelligence Video Interview Act	In force since 1 January 2026, and 2020 respectively	Effects-based liability for artificial intelligence discrimination, and an express prohibition on the use of a postal code as a proxy for a protected class. Exclusions X-03 and X-04.
Colorado Senate Bill 26-189	Signed 14 May 2026. Effective 1 January 2027.	Replaced Senate Bill 24-205 before that Act took effect, removing the algorithmic discrimination duty of care. Centres on advance notice, post-decision explanation within 30 days, meaningful human review, three year records and accessibility. Frequently misdescribed as a delay rather than a replacement.

10.4 Review cycle and triggers

The arrangements below govern the maintenance of this report and of the controls it describes.

Table 10.4 Review cycle

ACTIVITY	FREQUENCY	SCOPE
Regulatory horizon scan	Quarterly	Federal and all thirteen provincial and territorial jurisdictions. Bills, proclamations, regulator guidance and enforcement action. Feeds section 10.
This report	Annually, and on a trigger	Re-verification of the status of every instrument in Appendix A. No status is carried forward unchecked.
Human rights impact assessment	At design, before external release, within 90 days of a material change, and annually	The cadence recommended by the Ontario Human Rights Commission and the Law Commission of Ontario.
Rubric and question set review	On authoring, and on a change of jurisdiction	Enforcement of the disallowed question list against a rubric authored by an agency. Triage of matters raised by the post-call verifier at control C-05.
Findings register	Monthly until closure	Status of each open finding against its target date. A finding not closed by its target date is escalated.
Access, correction and erasure requests	30 days	Published response commitment. Control E-05.
Subprocessor change	On change	Published list updated. Assessment package under control F-06 refreshed for the new destination.

Any of the following requires a review of this report outside the annual cycle.

- a. A new capability of the platform, or any change to what a model is permitted to read or to decide.
- b. Entry into a province or territory in which no agency using the platform previously operated.
- c. A change of subprocessor, hosting region or model provider.
- d. An instrument coming into force in a jurisdiction in which the platform operates.
- e. A change to any of the exclusions at section 8, which will be recorded in the edition published before the capability is released.
- f. A finding at section 7.2 remaining open beyond its target date.

A Register of instruments

Every instrument identified during the assessment is listed. Each row resolves either to a control reference or to a reason why no control is required. Permitted reasons are: outside boundary, binds another party, not in force, and benchmark only. A blank disposition is not permitted and none appears.

Table A.1 Federal instruments

INSTRUMENT	STATUS	DISPOSITION	SECTION
Personal Information Protection and Electronic Documents Act, S.C. 2000, c. 5	In force	A-04, B-01, E-01 to E-05, F-01 to F-06, G-01, J-01, J-04	5.1, 6.5, 6.6
OPC, Guidelines for obtaining meaningful consent, 2018, updated 11 August 2025	Guidance	B-01 to B-04	6.2
OPC, Guidelines for processing personal data across borders	Guidance	F-06, A-04	5.1.1
OPC, Guidance for processing biometrics, final 11 August 2025	Guidance	X-01	8
CASL, S.C. 2010, c. 23, ss. 6, 10, 11, 20	In force	I-01 to I-03	5.1.3, 6.9
Competition Act, R.S.C. 1985, c. C-34, ss. 52, 74.01, 74.1	In force	J-05, X-06	5.1, 6.10, 8
Canadian Human Rights Act, R.S.C. 1985, c. H-6	In force	Binds another party	5.1.2
Employment Equity Act, R.S.C. 1985, c. 44 (2nd Supp.)	In force	Outside boundary	2.4(e), 10.1
Accessible Canada Act, S.C. 2019, c. 10	In force	Outside boundary	2.4(e)
Treasury Board Directive on Automated Decision-Making and Algorithmic Impact Assessment	Government instrument	Adopted voluntarily	5.1.2, 9
PSC, Artificial intelligence in the hiring process	Guidance	Adopted voluntarily. D-01, C-01, E-04, D-03, F-05	9.1
Joint FPT privacy commissioners, principles for generative AI, December 2023	Guidance	Adopted voluntarily. Domains B, E, F	9
ISED Voluntary Code of Conduct on Advanced Generative AI	Voluntary	Deployer measures applied. Not a signatory.	9
Bill C-36, Protecting Privacy and Consumer Data Act	Not in force	Not in force	10.1
Bill C-27, Part 3, Artificial Intelligence and Data Act	Died on the Order Paper	Not in force	5.1, 10.1

Table A.2 Ontario, British Columbia, Alberta and Quebec

INSTRUMENT	STATUS	DISPOSITION	SECTION
Employment Standards Act, 2000, ss. 8.2 to 8.6, and O. Reg. 476/24 ^a	In force 1 January 2026	A-01, A-02, A-06, A-08, C-03, E-06	5.2, 6.1
Employment Standards Act, 2000, ss. 15(7.1), 15(7.1.1) ^a	In force 1 January 2026	G-03. See finding F-2026-04.	6.7, 7.2
Employment Standards Act, 2000, Part XVIII.1, and O. Reg. 99/23	In force 1 July 2024	J-06	5.2, 6.10
Employment Standards Act, 2000, s. 41.1.1	In force	Binds another party.	5.2, Appendix C

INSTRUMENT	STATUS	DISPOSITION	SECTION
Human Rights Code, R.S.O. 1990, c. H.19, ss. 5, 11, 17, 23 ^a	In force	C-01 to C-07, H-01 to H-04	5.2.2, 6.3, 6.8
AODA, S.O. 2005, c. 11, and O. Reg. 191/11, ss. 14, 22, 23, 24 ^a	In force	H-01, H-02, H-05. See finding F-2026-02.	6.8, 7.2
Workplace Safety and Insurance Act, s. 83	In force	C-02	6.3
OHRC and Law Commission of Ontario, Human Rights AI Impact Assessment, November 2024	Guidance	Adopted voluntarily. See finding F-2026-03.	7.2, 10.4
Personal Information Protection Act, SBC 2003, c. 63, ss. 4, 13, 16, 19, 23, 34, 35	In force	A-03, B-01, E-01, F-01 to F-06, G-02, J-01	5.3, 6.6, 6.7
Human Rights Code, RSBC 1996, c. 210, ss. 11, 13	In force	A-06, C-03, C-06	5.3.1, 6.3
Employment Standards Act, RSBC 1996, c. 113, s. 12, and BC Reg 396/95	In force	J-06	5.3
Pay Transparency Act, SBC 2023, c. 18	In force 1 November 2023	A-06, C-04	5.3, 6.1, 6.3
Personal Information Protection Act, SA 2003, c. P-6.5, ss. 5, 13, 15, 18, 21, 24, 34, 34.1, 35	In force	A-03, B-01, E-01, F-01 to F-06, G-01, J-04	5.4, 6.6
Alberta Human Rights Act, RSA 2000, c. A-25.5, ss. 7, 8, 11	In force	C-01, C-02, C-03, C-05, C-06	5.4.1, 6.3
Employment Agency Business Licensing Regulation, Alta Reg 45/2012	In force	J-06	5.4
Protection of Privacy Act, SA 2024, c. P-27.5, s. 5(2)(d)	In force 11 June 2025	Binds another party.	5.4, 10.2
Act respecting the protection of personal information in the private sector, CQLR c. P-39.1, ss. 3.1, 3.3, 3.5, 8.2, 12.1, 14, 17, 27	In force	A-04, A-05, B-01, D-02, E-02 to E-04, F-06, J-01, J-04	5.5, 6.1, 6.4, 6.5
Act to establish a legal framework for information technology, CQLR c. C-1.1, ss. 44, 45	In force	X-01, X-02	5.5, 8
Charter of human rights and freedoms, CQLR c. C-12, ss. 10, 16, 18.1, 20	In force	C-01, C-02, C-06	5.5, 6.3
Regulation respecting personnel placement agencies, CQLR c. N-1.1, r. 0.1	In force 1 January 2020	A-06, J-06	5.5
Charter of the French Language, CQLR c. C-11, ss. 41, 42, 46	In force	A-07	5.5, 6.1

^a The consolidated statutes and regulations of Ontario are published on a system that could not be read directly by the tools used in the assessment. Section numbers and quoted text from these instruments were corroborated against no fewer than two independent professional sources. See section 2.6(f).

Table A.3 Other provinces, territories and standards

INSTRUMENT	STATUS	DISPOSITION	SECTION
Saskatchewan Human Rights Code, 2018, SS 2018, c. S-24.2, ss. 16, 19	In force	C-01, C-03, C-05	5.6, 5.7
The Saskatchewan Employment Act, s. 2-5	In force	Binds another party.	5.6
Manitoba Human Rights Code, CCSM c. H175, ss. 9(2), 14, 18	In force	C-01, C-03, C-05	5.6, 5.7
Manitoba Bill 51, Public Sector AI and Cybersecurity Governance Act	Awaiting proclamation	Not in force	10.2

INSTRUMENT	STATUS	DISPOSITION	SECTION
Nova Scotia Human Rights Act, RSNS 1989, c. 214, ss. 5(1)(d), 8	In force	C-01, C-03, C-05, C-06	5.6, 5.7
Nova Scotia Bill 234, Helping Working People Get Ahead Act	First reading	Not in force	10.2
New Brunswick Human Rights Act, RSNB 2011, c. 171, ss. 2.1, 4	In force	C-01, C-03, C-05	5.6, 5.7
Prince Edward Island Human Rights Act, s. 6; Employment Standards Act, ss. 5.8 to 5.10	In force 1 June 2022	A-06, C-01, C-04	5.6
Newfoundland and Labrador Human Rights Act, 2010, SNL 2010, c. H-13.1, s. 14	In force	C-01, C-03, C-05	5.6, 5.7
Newfoundland and Labrador Pay Equity and Pay Transparency Act	Passed 2022. Transparency provisions not proclaimed.	Not in force	10.2
Northwest Territories Human Rights Act, SNWT 2002, c. 18, ss. 7, 8	In force	C-01, C-03, C-05	5.6, 5.7
Nunavut Human Rights Act, SNU 2003, c. 12, ss. 9, 10	In force	C-01, C-03, C-05	5.6, 5.7
Yukon Human Rights Act, RSY 2002, c. 116, s. 9(b)	In force	C-01, C-03, C-05	5.6
CAN/DGSI 101:2025, National Standard of Canada	Voluntary standard	Assessed internally. Not certified.	9, 7.3
ISO/IEC 42001:2023, 42005:2025, 23894:2023, 25059:2023	Voluntary standards	Assessed internally. Not certified.	9
NIST AI Risk Management Framework 1.0 and AI 600-1	Voluntary framework	Applied. Gap at F-2026-03.	9
OECD AI Principles, 2019, updated 2024	Adherent state	Applied as the scoping definition.	9
Regulation (EU) 2024/1689	Partly in force	Benchmark only	8, 10.3
Local Law 144, City of New York; Illinois HB 3773 and AIVIA; Colorado SB 26-189	In force or pending	Benchmark only	8, 10.3
<i>Ontario (Human Rights Commission) v. Simpsons-Sears Ltd.</i> , [1985] 2 S.C.R. 536	Authority	Basis of C-06 and F-2026-03	5.7
<i>Clearview AI Inc. v. British Columbia (Information and Privacy Commissioner)</i> , 2026 BCCA 67	Authority	Basis of the position at section 5.3 that BC PIPA reaches the reporting entity directly	5.3

Forty-seven instruments are listed across Tables A.1, A.2 and A.3. Every instrument identified during the assessment appears. No instrument identified has been omitted.

B

Control index

Table B.1 Controls by domain, with result

REF	CONTROL	RESULT
A-01	Spoken disclosure before assessment, fixed per jurisdiction	No exceptions noted
A-02	Disclosure wording and enabled function record supplied to the agency	No exceptions noted
A-03	Notice of collection and purposes given before collection	No exceptions noted
A-04	Published privacy notice, subprocessors, processing location	No exceptions noted
A-05	Automated processing stated in the message communicating an outcome	Implemented, not yet tested
A-06	Jurisdiction specific posting fields treated as required	No exceptions noted
A-07	French as the default language of a Quebec deployment	Implemented, not yet tested
A-08	Disclosure of the use of artificial intelligence at the point of application	Exception noted. F-2026-01
B-01	Separate consent to recording and to assessment by artificial intelligence	No exceptions noted
B-02	Transcription stream withheld from the interview model until consent resolves	No exceptions noted
B-03	Deterministic resolution, confidence floor, keypad alternative, silence treated as decline	No exceptions noted
B-04	Consent turn logged and timestamped to the candidate record	No exceptions noted
C-01	Disallowed question list carried on every rubric including a rubric authored by an agency	No exceptions noted
C-02	Injury and compensation history excluded from adverse treatment	No exceptions noted
C-03	Model instruction forbidding protected characteristics, covered by an automated test	No exceptions noted
C-04	Pay history not extracted or surfaced where prohibited	No exceptions noted
C-05	Post-call verifier detecting a prohibited question that was put	No exceptions noted
C-06	Dispatch ordering computed without demographic input or proxy	No exceptions noted
C-07	Periodic review of outcomes for disparate effect	Exception noted. F-2026-03
D-01	Platform cannot record a hire or express an acceptance	No exceptions noted
D-02	Review by a person with authority to change the outcome, on request	No exceptions noted
D-03	Uncertainty resolves to the review band	No exceptions noted
D-04	Ambiguous identity match held for a person; no automatic merge	No exceptions noted
E-01	Registry of personal information categories with paired export and erasure adapters	No exceptions noted

REF	CONTROL	RESULT
E-02	Build fails where a table holding personal information is unregistered	No exceptions noted
E-03	Receipt states lawful exceptions and pending vendor deletions; no silent omission	No exceptions noted
E-04	Assessment computation retained per candidate	No exceptions noted
E-05	Thirty day response commitment and published escalation route	Non-occurrence
E-06	Interview date recorded and interviewed population made available to the agency	No exceptions noted
F-01	Field level envelope encryption of sensitive values	No exceptions noted
F-02	Envelope bound to tenant, table, row and field	No exceptions noted
F-03	Row level security armed per request; no privileged bypass for scheduled work	No exceptions noted
F-04	Declarative authorisation policy verified by an exhaustive matrix test	No exceptions noted
F-05	Append only audit of reads with actor and stated purpose	No exceptions noted
F-06	Standing transfer assessment package covering every subprocessor and destination	No exceptions noted
G-01	Retention enforced by scheduled deletion, cascading to stored objects	No exceptions noted
G-02	Decision data retained for not less than one year	No exceptions noted
G-03	Posting records retained for not less than three years	Exception noted. F-2026-04
H-01	Accommodation offered in the spoken disclosure before any question	No exceptions noted
H-02	Accommodation or human request routed to the agency without adverse effect	No exceptions noted
H-03	Keypad alternative to speech at the consent turn	No exceptions noted
H-04	Non-response and unclear answers not treated as failure	No exceptions noted
H-05	Candidate facing surfaces conform to WCAG 2.0 AA, evidenced	Exception noted. F-2026-02
I-01	Sender identification on every outbound message	No exceptions noted
I-02	Unsubscribe facility on every outbound message, effected within 10 business days	No exceptions noted
I-03	Transactional messaging separated from promotional messaging	No exceptions noted
J-01	Privacy officer designated and published	No exceptions noted
J-02	Model routing locked to a single approved provider by an automated test	No exceptions noted
J-03	No training on customer data, no sale, no onward commercial disclosure	No exceptions noted
J-04	Incident assessed against three statutory thresholds; facts supplied to the agency	Non-occurrence
J-05	No performance representation without a prior adequate and proper test	No exceptions noted

REF	CONTROL	RESULT
J-06	Agency licence recorded at onboarding	No exceptions noted

C

Controls to be operated by the agency

The design of the platform assumes that the agency operates the controls below. Where the agency does not, the corresponding platform control may not achieve its purpose. The assessment at section 6 does not extend to these controls and no conclusion is expressed on whether any agency operates them.

Table C.1 Complementary controls

NO.	CONTROL TO BE OPERATED BY THE AGENCY	PLATFORM CONTROL THAT DEPENDS ON IT
1	Hold and maintain any licence required in the jurisdiction in which it operates, and verify the licence status of any recruiter it engages.	J-06 records the licence. It does not verify it or keep it current.
2	Include in every publicly advertised job posting the disclosures required by the jurisdiction in which the work is performed, including the statement required by section 8.4 of the ESA.	A-02 supplies the wording and the record of enabled functions. The obligation attaches to the posting, which the agency publishes.
3	Read, and satisfy itself as to, the criteria and weights of any rubric it authors or adopts, and confirm that each criterion is related to the requirements of the role.	C-01 and C-03 prevent a prohibited question. They do not establish that a permitted criterion is job related.
4	Act on a candidate routed to the review band, and respond to a request for review of an outcome by assigning it to a person with authority to change that outcome.	D-02 and D-03 route the candidate and equip the reviewer. The decision is the agency's.
5	Notify an applicant who was interviewed whether a hiring decision has been made, within 45 days of the last interview, as required by section 8.6 of the ESA.	E-06 records the interview date and makes the population available.
6	Maintain a written policy on electronic monitoring where it employs 25 or more, and provide it to an assignment employee within 24 hours of the start of an assignment, as required by section 41.1.1 of the ESA.	No platform control. The obligation is the agency's alone.
7	Retain records of publicly advertised job postings, application forms and applicant notifications for three years.	G-03, subject to finding F-2026-04.
8	Provide accommodation where a candidate requests it, and notify applicants and the public that accommodation is available in the recruitment process, as required by sections 22 and 23 of the IASR.	H-01 and H-02 make the offer and route the request. The provision of accommodation is the agency's.
9	Assess and report a confidentiality incident to the relevant commissioner and to affected individuals where the applicable threshold is met.	J-04 supplies the facts. The report is made by the agency as the organisation in control of the information.
10	Where operating in Quebec, hold the CNESST licence, ensure the licence number appears on all business documents and advertising, and complete an assessment under section 17 of Law 25 before personal information is communicated outside Quebec.	A-06 and F-06 supply the licence field and the standing assessment package.

D Basis of preparation for stated figures

Every quantified figure stated in this report is defined below, with its scope, its source and any exclusion. No figure is stated elsewhere in the report that does not appear here.

Table D.1 Stated figures

FIGURE	DEFINITION	SOURCE AND METHOD	EXCLUSIONS
52 controls	The number of control activities stated in the tables at section 6.	Count of rows across Tables 6.1 to 6.10.	Excludes the six exclusions at section 8, which are not controls, and the ten complementary controls at Appendix C, which are not operated by the reporting entity.
47 instruments	The number of statutes, regulations, guidance documents, standards and authorities listed in Appendix A.	Count of rows across Tables A.1, A.2 and A.3.	Where a single statute is assessed at more than one provision, it is counted once. Two judicial authorities are included in the count.
14 jurisdictions	Federal Canada, ten provinces and three territories.	Enumerated at sections 5.1 to 5.6.	No jurisdiction outside Canada is included in the count.
11 subprocessors	The number of third parties processing personal information on behalf of the reporting entity, as published.	Published subprocessor list as at 31 July 2026, reconciled against the providers configured in the platform.	Excludes providers holding no personal information. The list is refreshed on change under control F-06.
11 roles	The number of authorisation roles in the declarative access policy.	Count of roles in the policy inspected at control F-04.	Excludes portal principals, which are confined to a separate projection.
Eight test calls	Calls placed through the prescreen for the purposes of the procedures at controls A-01, B-01, B-03, H-01 and H-03.	Two calls in each of four jurisdiction settings, covering the four consent paths.	Test calls were placed to numbers held by the reporting entity. No call was placed to a candidate.
Three prohibited questions	Questions inserted into a constructed transcript for the purposes of the procedure at control C-05.	One question each concerning age, family status and criminal record.	The transcript was constructed. No candidate transcript was used.
Four constructed cases	Cases used to re-perform the scoring computation at control D-03.	An unanswered dimension, an unclear dimension, a red flag with a high composite score, and a composite score outside every configured band.	Constructed. No candidate record was used.
Monetary figures	Statutory maxima stated at sections 5 and 8.	The text of the instrument cited.	Stated in Canadian dollars unless the instrument provides otherwise. No estimate of exposure is stated.

No figure is stated in this report describing the accuracy, effectiveness, speed or comparative performance of the platform. Section 74.01(1)(b) of the Competition Act requires that a representation as to performance be supported by an adequate and proper test conducted before the representation is made. Control J-05 was applied to this report during its preparation.

E**Statement by management**

This statement is made in respect of the report entitled *Assessment of the Kordis platform against Canadian requirements governing the use of artificial intelligence in recruitment and employment*, document reference KAI-RA-2026-01, version 1.0, in respect of the period 1 January 2026 to 31 July 2026.

We confirm, to the best of our knowledge and belief, that:

- a. the description of the system at section 3 fairly presents the Kordis platform as it was designed and operated throughout the period;
- b. the control activities stated at section 6 were in place throughout the period and were designed to address the requirements to which they are mapped in Appendix A;
- c. the results stated at section 6 are the results obtained on performing the procedures described at section 4, and no result has been omitted or restated;
- d. the four matters recorded at section 7.2 are the only matters arising from those procedures that were classified as a non-conformity, and each carries an owner and a target date;
- e. no statement in this report asserts a certification, attestation or independent examination that the reporting entity does not hold; and
- f. the reporting entity holds no certification in respect of the matters covered by this report, and this report has not been examined by an independent practitioner.

For and on behalf of 17989296 Canada Inc., trading as Kordis
Management of the reporting entity

Toronto, Ontario, Canada
12 August 2026

The name and contact details of the privacy officer of the reporting entity are published at kordisai.com/privacy, together with the escalation route to the Office of the Privacy Commissioner of Canada and to the provincial commissioners.