

International Education Strategy Renewal Consultations

Written Submission from World Education Services
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About WES

World Education Services (WES) is a non-profit social enterprise that supports the educational, economic, and social inclusion of immigrants, refugees, and international students. For nearly 50 years, WES has set the standard for international academic credential evaluation, supporting millions of people as they seek to achieve their academic and professional goals. Through decades of experience as a leader in global education, WES has developed a wide range of tools to pursue social impact at scale. From evaluating academic credentials to shaping policy, designing programs, and providing philanthropic funding, we partner with a diverse set of organizations, leaders, and networks to uplift individuals and drive systems change. Together with its partners, WES enables people to learn, work, and thrive in new places.

WES is pleased to provide input to **Global Affairs Canada (GAC)** on the renewal of the International Education Strategy (IES) to maintain Canada's competitive edge in the international education arena and to ensure that international students can make informed decisions about their future and receive ethical services.

WES also provided **recommendations** to **Immigration, Refugees and Citizenship Canada (IRCC)** on international students in April 2023, as part of the Future of Canada's Immigration System Consultations.

Core Recommendations from WES

- Ensure the provision of **clear, accessible, and transparent information** to international students before and after their arrival in Canada.
- Establish a **multi-stakeholder, interjurisdictional (federal/provincial/territorial), collaborative table** dedicated to designing and implementing accountability measures relevant to international student recruitment and the provision of services to international students by the post-secondary sector. Consider the neutral and consensus-based standards development model offered by the **Canadian Standards Association (CSA)** for the generation of these accountability measures.
- Mandate the table to jointly design an **accountability system** that:
 - has robust compliance, monitoring, and enforcement mechanisms

- holds the educational institutions and education agents jointly and severally liable
- outlines the expectations and obligations of governments, post-secondary institutions, education agent aggregators and their subcontracted agents, and students themselves
- ensures that recruitment practices are transparent and fair and that they adhere to an ethical framework
- Establish a **dedicated regulatory body** to provide oversight of education agent aggregators and their subcontracted agents and provide this body with the means to ensure adherence to an agreed-upon national regulatory standard.
- Develop **memorandums of understanding (MoU)** with the governments of top sending countries (or subnational-level governments) that clearly explain compliance, monitoring, and enforcement mechanisms that the sending country and the Canadian post-secondary sector jointly and severally agree to implement.

Context for Our Recommendations

Canada continues to be a **favoured choice** worldwide for international students because of the country's renowned education system and reputation for having an inclusive and safe society. That hard-earned reputation is at risk. The number of international students in Canada has **tripled** over the past decade. By the end of 2022, there were over **800,000** study permit holders, reflecting a 30 percent increase compared to the previous year.

We are now at a crisis point where growth is impacting quality, accountability, consistency, and basic human needs, including housing.

The international student market contributes significantly to the Canadian economy and the students are a valuable talent pool. International students account for approximately **18 percent** of post-secondary enrollment in Canada, making substantial contributions of over \$22 billion to the economy annually. Their pursuit of higher education in Canada also supports more than 170,000 jobs each year.

International students make a significant investment in their education in Canada. They are required to pay much **higher tuition fees**, with an average annual cost ranging from \$20,000 to \$30,000. This amount is nearly three times higher than the tuition fees domestic students are charged.

Decades of government underfunding of universities and colleges, coupled with economic and demographic pressures, have compelled the post-secondary sector to seek external revenue streams, leading to **differential tuition fees** for international students. **Statistics Canada** data between 2005 and 2019 show the number of international students increased by 223 percent. Such massive growth

and financial reliance have consequences and serious risks, as noted in reports from the **Royal Society of Canada** and the **Office of the Auditor General of Ontario**.

The growing international student market has enabled unethical recruitment practices that are difficult to regulate given extra-jurisdictional realities and given the financial vulnerabilities of universities and colleges.

Media reports of international students being victims of **misinformation and fraud**, having **poor and limited housing options**, and committing suicide at **alarming rates**, among other challenges, endanger Canada's reputation as a favoured destination for higher education.

The interconnected dynamics of international education require Canada's IES to engage all stakeholders, including both provincial/territorial and federal governments as well as educational institutions and, increasingly, private sector players.

We believe that a thorough comprehension of the international student journey will greatly contribute to the renewal of the Canada's IES. This includes pre-arrival preparation, in-Canada educational and community experiences, and entry into the workforce either in Canada or a student's home country, or a third country.

WES has consulted with several international student groups to better understand their challenges, and their input has informed our policy recommendations.

Below, WES offers observations and recommendations regarding the specific consultation questions outlined in GAC's planning papers. They will be presented in three parts:

- Ensuring that clear, accessible, and transparent information is provided to international students before and after their arrival in Canada
- Improving accountability to both promote and protect Canada's reputation
- Regulating education agents

1. The need for clear, accessible, and transparent information

- Consultation question: How can we better align our digital marketing efforts with those of the provinces and territories, as well as institutions and education associations?
- Consultation question: Are there any other ethical considerations in international education that should be addressed in the next IES?

GAC plays a crucial role in marketing Canada’s international education opportunities to prospective students around the world. To maintain a compelling reputation, attract top talent, and ensure the satisfaction of international students, GAC must ensure that clear, accessible, and transparent information is provided to international students before and after their arrival in Canada by all levels of government and non-governmental bodies.

Media reports have highlighted instances when international students have fallen victim to misinformation and fraudulent practices. These students, often unfamiliar with the local landscape and regulations, are susceptible to scams and deceitful practices that can lead to financial losses and shattered dreams. Such incidents not only impact individual students but also erode the trust and confidence that prospective international students place in Canada's education system.

To safeguard Canada’s standing as a favoured educational destination, it is imperative to prioritize the provision of clear, accessible, and transparent information to international students throughout their journey—from pre-arrival to their time spent studying in Canada.

One crucial step toward mitigating misinformation is to ensure collaboration between GAC and other stakeholders, including IRCC, educational institutions, education agents, provincial governments, and non-governmental organizations. Regular communication and coordination will help maintain updated resources and provide a cohesive and reliable information network for international students.

Furthermore, the benefits of higher education in Canada are noteworthy. They include academic excellence, innovative research, and a diverse range of programs. Equally important is providing transparent information to international students about the challenges they may face during their studies in Canada. These **challenges** may include adjusting to a new academic system, language barriers, cultural differences, finding employment and accommodations, and managing the financial aspects of studying abroad.

By prioritizing clear, accessible, and transparent information provision, GAC can empower international students to make informed decisions and take responsibility for their choice to pursue education opportunities in Canada. Enhancing information dissemination strategies, addressing challenges faced by international students, and collaborating with stakeholders will increase international students’ trust in the Canadian education system and solidify Canada’s position as a global leader in providing quality education to students from countries around the world.

Recommendations to ensure clear, accessible, and transparent information provision to international students

Intradepartmental recommendations

- GAC should work closely with IRCC and Employment and Social Development Canada (ESDC) to ensure **information consistency and transparency** regarding international education opportunities in Canada.
- The federal departments must align their efforts to provide **clear, accessible, and transparent information** to international students regarding applying to Canadian academic programs, relevant immigration policies, and pathways to permanent residency.
- Non-governmental bodies, including post-secondary institutions and education agents, should be required to use **government-approved information** to ensure accuracy and consistency in the information provided.

External recommendations

- GAC should collaborate closely with Canadian educational institutions to ensure the **accuracy and consistency of the information presented in their marketing materials**. In this regard, alternatively, GAC can engage national organizations like the Canadian Bureau for International Education (CBIE) and regional entities like the British Columbia Council for International Education (BCCIE) and EduNova to accomplish this goal.
- GAC should establish **regular communication and feedback mechanisms with post-secondary institutions** to facilitate the sharing of timely data and updates on program offerings, admission requirements, and support services.
- GAC should engage in **partnerships and collaborations** and where possible also establish MoU with other countries and international organizations to share best practices and align information provision standards. By working together, countries can collectively enhance the credibility and reliability of information in international education marketing, benefiting students and the sector overall.

2. The need for greater accountability in the sector

- Consultation question: Can federal and provincial governments agree on a national Code of Conduct for Education Agents?
- Consultation question: Should institutions be held accountable for the conduct of agents who recruit on their behalf? Should sanctions for non-compliance include removal from the designated learning institution (DLI) list?

International student recruitment is an interjurisdictional issue requiring collaboration between and among federal and provincial/territorial governments and other relevant stakeholders, including post-secondary institutions and student organizations.

However, diverse and distinct policies and initiatives across jurisdictions create gaps and loopholes that may be exploited by unscrupulous actors.

As the federal government is responsible for the issuance of study permits, it should play a leading role in convening the stakeholders and jointly designing an accountability system. This system should encompass the expectations and obligations of various entities involved, including governments, post-secondary institutions, education agent aggregators, subcontracted agents, and students themselves. It should also emphasize the adherence to ethical guidelines throughout the recruitment process.

To effectively implement this accountability system, the government should consider the standards development model offered by the **Canadian Standards Association (CSA)**. CSA has a proven track record in developing neutral, consensus-based standards across various economic sectors, making it a strong candidate to develop standards tailored to the international education sector in Canada.

By working with CSA, the government can have confidence that these standards will be impartial and reflective of the best interests of stakeholders across the sector. CSA's expertise in establishing accredited standards that are widely recognized and respected will add credibility to the accountability framework, increasing its acceptance and adoption.

CSA's process would involve collaborating with a diverse and balanced group of stakeholders such as government representatives, educational institutions, education agent aggregators, and student advocacy groups. Through an inclusive approach, CSA would convene a representative committee of stakeholders to gather insights, best practices, and diverse perspectives. This committee would use this information to develop a standard that addresses the specific needs of the international education sector.

Once these practices are established, it will be crucial to ensure their effective implementation and enforcement. The provincial governments, being responsible for overseeing the operations of educational institutions within their jurisdictions, are well-positioned to play a pivotal role in enforcing the standards. Through the creation of a regulatory framework that ensures compliance with the established standards, the accountability system can be effectively implemented and enforced.

This approach combines the expertise and oversight of provincial authorities with nationally recognized standards, creating a comprehensive and consistent regulatory environment for the international education sector across Canada. Moreover, a collaborative approach involving provincial governments fosters effective communication and sharing of best practices, enabling provinces to learn from one another's experiences and continuously improve the regulatory framework.

To ensure accountability and maintain the integrity of Canada's education system, it is crucial to have a regulatory framework that includes the potential for revocation of a DLI status. Such a framework would come into play in situations where education agents, subcontracted agents, or educational aggregators have breached agreed-upon standards of practice or engaged in misconduct. It would compel institutions to invest in recruitment systems that ensure their own integrity.

By implementing such a framework, Canada can effectively address instances where these entities fail to uphold ethical practices or where they compromise the quality of education provided to international students. It would create a mechanism to investigate allegations of misconduct, evaluate evidence, and take appropriate action against the responsible parties.

Under such a regulatory framework, specific criteria and guidelines would be established to identify the types of violations or misconduct that would warrant the removal of a DLI status. This could include operational failures or oversight measures to prevent fraudulent practices, misrepresentation of information, or other actions by education agents that significantly impact the welfare and educational experience of international students.

A firm policy position obligates post-secondary institutions and education agent aggregators to take student recruitment seriously and to diligently monitor their activities.

The benefits of this regulatory framework are twofold. Firstly, it safeguards the reputation of Canadian educational institutions by ensuring that those acting in violation of agreed-upon standards are held accountable. This strengthens the trust and confidence that international students and their families have in the Canadian education system.

Secondly, it protects the interests and well-being of international students themselves. By swiftly addressing misconduct and removing the status of institutions involved, the framework creates a safer and more secure environment for students pursuing their education in Canada. It sends a strong message that Canada prioritizes the welfare of its international student population and will act to uphold its reputation in an increasingly competitive market.

Recommendations to improve accountability in the sector

- Establish a **multi-stakeholder, interjurisdictional (federal/provincial/territorial), collaborative table** dedicated to designing and implementing accountability measures relevant to international student recruitment and the provision of services to international students by the post-secondary sector. Consider the neutral and consensus-based standards development model offered by the **Canadian Standards Association** (CSA) for the generation of these accountability measures.
- Mandate the table to jointly design an **accountability system** that:
 - has robust compliance, monitoring, and enforcement mechanisms
 - holds the educational institutions and education agents jointly and severally liable
 - outlines the expectations and obligations of governments, post-secondary institutions, education agent aggregators and their subcontracted agents, and students themselves
 - ensures that recruitment practices are transparent and fair and that they adhere to an ethical framework
- Encourage the provincial governments to develop a **regulatory framework** that ensures the compliance, monitoring, and enforcement action of practices of educational institutions, education agents, and other entities within the accountability system.

3. The need to regulate education agents

- Consultation question: Is this an issue that can be self-regulated by the sector itself? Should education agent aggregators be held accountable for the conduct of their subcontracted agents?
- Consultation question: Can the College of Immigration and Citizenship Consultants of Canada be tasked with the regulation of education agents?

As **intermediaries** in the international student recruitment process, education agents have become an important part of the post-secondary institution landscape. Agents offer guidance, counsel, and placement assistance to prospective students and their families. Educational institutions typically remunerate agents who represent them and provide these services.

According to a report published in November 2021 by International Consultants for Education and Fairs (ICEF) Monitor, a global organization dedicated to facilitating global student mobility, nearly **50 percent** of international students studying in Canada are referred to their institutions through education agents.

The recruitment of international students brings immense opportunities and benefits to both students and host countries. However, incidents of unethical practices and fraudulent activities within the international student recruitment process have raised concerns about the credibility and accountability of the system.

Some **education agents** make false promises about Canadian employment and immigration opportunities for international students. Inaccurate or misleading information from education agents presents many challenges and is a “**key vulnerability to Canada’s international education sector.**”

It is a common practice for education agents to work with **subcontracted agents**, which makes the recruitment business even more complex and contributes to an increase in unethical practices in the sector. Through these complex business relationships, post-secondary institutions transfer their recruitment responsibility to education agents, who then transfer their responsibility to subcontracted agents. This recruitment supply chain model leads to unscrupulous activities and comes with a social cost. The most recent example is over 700 international students being confronted with the **possibility of deportation** because of the fraudulent admission letters allegedly provided by their agents.

These challenges are not new. They have been **documented** for many years and necessitate stronger and more proactive measures from federal and provincial governments to prevent unethical practices and hold the relevant stakeholders accountable.

Both **Australia** and **New Zealand** have implemented regulatory frameworks that govern education agents, which provide valuable insights for examination. **Manitoba** has also taken steps toward implementing similar measures. However, it is advisable for the federal government to prevent the development of a fragmented system of subnational solutions concerning agents and standards of practice.

Instead, as discussed above, it is recommended that the federal government, in consultation with relevant stakeholders, establish a comprehensive national framework with strong enforcement measures. This national framework would serve as a unified approach that all provinces and territories must adhere to.

Although many regulated professions in Canada are **self-regulated**, their regulatory bodies are established by federal or provincial legislation and include enforcement measures in cases of misconduct.

In the context of international student recruitment, the current self-regulation practices are dispersed and unable to produce effective results. The CBIE has its own **Code of Ethical Practice (2013)** for its members, which includes an emphasis on transparency in student recruitment and conducting thorough due diligence when collaborating with agents. Similarly, ICEF administers the **Canada Course for Education Agents (CCEA)** and provides a qualification badge for all candidates who complete the course and pass the exam.

Unless the self-regulation of education agent aggregators and their subcontracted agents is monitored by a dedicated regulatory body established by legislation, the existing problems in the recruitment field will persist.

In addition, there are challenges in cases where education agents operate outside of Canada's jurisdictional authority. However, lessons learned from **regulating labour brokers**, who similarly operate outside of Canadian jurisdiction, could be applied to regulating education agents. There is also a relevant precedent from the **2014 Overhaul of Canada's Temporary Foreign Worker Program** which established a compliance framework and an administrative monetary penalty pyramid that applied to labour brokers. Similar measures could be applied to education agents, including those operating outside of Canada's jurisdiction.

To effectively address the persistent issues in the recruitment field, it is imperative to establish a dedicated regulatory body responsible solely for monitoring the regulation of education agent aggregators and their subcontracted agents.

The role of the new regulatory body would encompass several key functions, including:

- **Monitoring compliance:** The regulatory body would monitor the compliance of education agent aggregators and their subcontracted agents with the established standards and guidelines. Regular assessments, audits, and inspections would be conducted to ensure adherence to ethical practices, transparency, and fair treatment of international students.
- **Enforcing regulations:** The regulatory body would have the power to enforce regulations and impose appropriate sanctions on education agent aggregators and subcontracted agents found to be in violation of the established standards. This can include issuing warnings, fines, probationary periods, or even revoking licenses or certifications in severe cases.
- **Investigating complaints and grievances:** The regulatory body would be responsible for investigating and addressing complaints and grievances filed by international students or other stakeholders. It would provide a platform for individuals to report misconduct and seek resolution and would ensure that appropriate actions are taken against offending agents.
- **Providing guidance and resources:** The regulatory body would offer guidance, resources, and training programs to education agent aggregators and subcontracted agents to assist them in

understanding and meeting the regulatory requirements. This support would aim to promote awareness, education, and continuous improvement in the recruitment practices of these entities.

- **Collaborating with stakeholders:** The regulatory body would collaborate closely with stakeholders such as government agencies, educational institutions, student associations, and industry experts. This collaboration would facilitate the exchange of information, best practices, and insights to enhance the effectiveness of regulatory oversight.

Mandating responsibility to a competent, dedicated regulatory body enables the government to enhance oversight and regulation of education agents, which will be contributing to the integrity, quality, and reputation of Canada's international education brand.

Recommendations regarding education agents

- Establish a **dedicated regulatory body** to provide oversight of education agent aggregators and their subcontracted agents and provide this body with the means to ensure adherence to an agreed-upon national regulatory standard. This oversight could operationally include:
 - Establishing a **registry** for education agent aggregators and their subcontracted agents and require licensure to operate in Canada
 - Ensuring **removal from the registry and revocation of licensure** to operate in Canada for violations of standards of practice
 - Creating guidelines on **appropriate fees**
 - Obligating senior management representatives of education agent aggregators and their subcontracted agents to participate in **annual orientation courses** regarding standards of practice, compliance protocols, and enforcement mechanisms to facilitate the sectors' understanding and liabilities
 - Requiring education agent aggregators to post a **non-refundable, forfeitable financial bond** in cases of a violation of a standard of practice
 - Obligating education agent aggregators and their subcontracted agents to provide clients with **government-approved written information** (multilingual) detailing their services and accurate information regarding visa application and immigration processes.
- Develop **memorandums of understanding (MoU)** with the governments of top sending countries (or subnational-level governments) that clearly explain compliance, monitoring, and enforcement mechanisms that the sending country and the Canadian post-secondary sector jointly and severally agree to implement.