



Pre-Budget Consultations 2025 Federal Budget

Written Submission from World Education Services

August 2024

About WES

World Education Services (WES) is a non-profit social enterprise dedicated to helping international students, immigrants, and refugees achieve their educational and career goals in Canada and the United States. For more than 45 years, WES has set the standard of excellence in the field of international academic credential evaluation. Through WES Global Talent Bridge, the organization joins with institutional partners, community-based organizations, and policy makers to help immigrants and refugees who hold international credentials fully utilize their talents and education to achieve their academic and professional goals. Its philanthropic arm, the WES Mariam Assefa Fund, supports catalytic leaders and organizations working to build inclusive economies and to ensure that immigrants and refugees can achieve their aspirations and thrive. Since 2013, WES has been a designated provider of Educational Credential Assessments (ECAs) for Immigration, Refugees and Citizenship Canada (IRCC).



WES is pleased to contribute this policy submission as the committee prepares for the 2025 Budget. We share the Government of Canada's goal to build a nation that is economically, socially, and culturally prosperous. A transparent immigration system with clear objectives, robust systems for cross-partner engagement, and investments in infrastructure to support a growing population will be critical to Canada's future success.

Summary of Recommendations

1. Strengthen coordination across federal departments, levels of government, and civil society to create a whole-of-government and whole-of-society approach to immigration.
2. Ensure that international students have access to clear and accurate information.
3. Institute a case management approach to Category-Based Selection.
4. Support for temporary to permanent residence transition and infrastructure investments.

Recommendation 1: Strengthen coordination across federal departments, levels of government, and civil society to create a whole-of-government and whole-of-society approach to immigration.

The complex nature of the immigration system requires a strong mechanism for collaboration across a range of stakeholders, both governmental and non-governmental. IRCC's strategic plan, "An Immigration System for Canada's Future," articulated a vision to secure Canada's economic resilience and global competitiveness, led by a whole-of-government and whole-of-society approach. To achieve this vision, the Canadian government will need stronger mechanisms to communicate effectively and coordinate efforts.

A division in Privy Council should be established that includes representatives from Global Affairs Canada, Employment and Social Development Canada, and Immigration, Refugees and Citizenship Canada, as well as departments knowledgeable in addressing discrimination and xenophobia. In addition, Privy Council should convene a Ministers Task Force to ensure greater alignment and communication between key ministries and the provinces/territories.

Coordination within and beyond government is particularly important for category-based selection (CBS) draws from the Express Entry pool and for the international student system. Both of these programs affect a wide range of civil society actors, including post-secondary institutions, licensing bodies, employers, and settlement service providers. It is vital that both programs are guided by clear objectives and informed by good data on newcomer outcomes.



Recommendation 2: Ensure that international students have access to clear and accurate information.

International students bring 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.

Education agents play a crucial role in international student recruitment. Some education agents make false promises about Canadian employment and immigration opportunities for international students. Inaccurate or misleading information from education agents is a key vulnerability to Canada's international education sector. It is a common practice for education agents to work with subcontracted agents. 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 has left room for unscrupulous activities. The social cost of unscrupulous activities is high. For example, recently 700 international students were confronted with the possibility of deportation because of the fraudulent admission letters allegedly provided by their agents.

The prevalence of unethical practices and fraudulent activities of education agents and their subcontracted agents raise concerns about the credibility and accountability of the current system. Without robust monitoring and enforcement by a dedicated regulatory body, the existing problems in recruitment will persist. To counter recruitment misinformation and safeguard Canada's standing as a favoured education destination, policies are needed to ensure international students' access to clear, accurate, transparent information at every point along their higher education journey, from pre-arrival to time spent in Canada. This requires:

- Collaboration across post-secondary Institutions and relevant federal and provincial/territorial governments to ensure consistent and transparent information about international education opportunities in Canada.
- Establishment of a dedicated regulatory body to oversee education agents, as well as aggregators and their subcontracted agents. This body would enforce regulatory standards, maintain a registry, and require licensure for agents operating in Canada. Violations of standards of practice should result in removal from the registry and revocation of licensure.
- Collaboration with sending countries: Development of memorandums of understanding (MoU) with governments of top sending countries and Canadian post-secondary institutions can establish impactful compliance, monitoring, and enforcement mechanisms. These MoUs



would facilitate international cooperation and align regulatory efforts to address misconduct and maintain ethical standards.

Recommendation 3: Institute a case management approach to Category-Based Selection.

WES is concerned that the category-based selection (CBS) draws may not fulfill their intended purpose in the way that CBS has been conducted thus far. Many of the occupations in STEM, health, and trades sectors included in the 2024 priority occupations for CBS are licensed professions. A great deal of evidence documents the challenges that in the pathway to licensure and work for newcomers with a background in a regulated profession. It is essential that people selected for the purpose of filling labour market gaps are actually able to do so.

Unfortunately, to date CBS has not been complemented with an end-to-end plan to ensure that immigrants quickly find work commensurate to their education and experience. WES recommends that Canada invest in the creation of a case management approach to CBS. This means designing a process to allow IRCC, in cooperation with provinces/territories and regulatory bodies, to ensure prior to selection that there is a viable pathway to licensure for each candidate in regulated professions and trades (who are not already licensed in Canada) based on their specific circumstances. It also means providing applicants with the necessary information about their specific pathway and directly connect individuals to the appropriate bodies and supports to pursue licensure.

It is essential to work with provincial or territorial governments and regulatory bodies to create clear, fast pathways to licensure for each licensed occupation. These pathways are a necessary precursor to recruiting new workers in licensed occupations. Federal funding should be dedicated to modernize and accelerate licensure processes.

Finally, to ensure that CBS is meeting its objectives, WES recommends the creation of an independent oversight body to monitor category-based selections and report to parliament in a timely manner. Additional investment will be required to gather data on whether the program is meeting its objectives, i.e. whether those selected are in fact able to enter the workforce in their profession or trade.



Recommendation 4: Support for temporary to permanent residence transition and infrastructure investments.

Canada is home to a large number of temporary residents – an estimated 2.8 million individuals at the end of Q2 of 2024. Many people with temporary residence have been in Canada for a long period of time and work in industries that face labour shortages. This means that temporary residents are filling structural gaps in Canada’s economy, but without the same rights and protections as other members of the Canadian labour force. A priority should be to expand pathways for temporary residents to transition to permanent residence.

Canada should enhance oversight by allocating funds to improve the oversight and regulation of the Temporary Foreign Worker Program. This includes reducing the reliance on temporary permits for long-term vacancies and ensuring that temporary foreign workers have pathways to permanent residency.

Finally, Canada should expand the eligibility criteria for federally-funded settlement services, since most new permanent residents begin their life in Canada as temporary residents.