



Standing Committee on Citizenship and Immigration study: Recent Reforms to the International Student Program

Written brief from World Education Services

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International students bring fresh perspectives and global connections that enrich classrooms, communities, and businesses across Canada. But in the past year, Canada's environment of welcome for international students has been dismantled. Precarity has deepened for international students and recent graduates, as well as their families. In this time of policy turbulence, consideration should be given to those already in Canada who do not have time to prepare for the next phase in their academic and professional journeys. Students' voices must be heard in the policymaking process that will affect almost a million students and their families.

World Education Services Canada (WES), a non-profit social enterprise dedicated to helping international students, immigrants, and refugees, proposes ten policy recommendations that are motivated by two goals: to support the decision making of international students already in Canada and who came in good faith based on prior policies, and to ensure the sustainability of a world class international student system.

Recommendations

1. Convene a collaborative, multi-sector roundtable to **design and implement international student system accountability measures** coupled with robust monitoring, and enforcement mechanisms.
2. **Establish an International Student Advisory Council** to provide student feedback on international student conditions and policies.
3. **Develop a clear and stable pathway to permanent residence** specifically for international students who wish to remain in Canada
4. **Implement a one-time temporary work permit extension** for international students and graduates already in Canada.
5. **Expand eligibility criteria for federally funded settlement services** to include current and former international students.
6. **Set minimum standards for provision of key services** including academic, settlement, career, and immigration services, as well as health and mental health supports.
7. Create a **dedicated regulatory body to oversee education agents**.



8. Collaborate with top sending countries to enable **monitoring and enforcement of international student recruitment standards**.
9. Incentivize provinces and territories to **develop fiscal strategies to enable the sustainability and long-term financial health of the post-secondary sector**.
10. Incentivize provinces and territories to **prohibit exorbitant differences in tuition fees** between domestic students and international students.

Context

The post-secondary sector relies on international student dollars

Growth in international student enrollment has roots in the decline in provincial funding for public post-secondary institutions. Institutional budgets have risen, but **since the 2008 global financial crisis**, government funding has declined. Reductions in government funding are particularly stark in Ontario. According to the **Blue-Ribbon Panel on Postsecondary Education Financial Sustainability** in 2023, provincial funding in Ontario is only 44% of the per student funding level in the rest of Canada for college students and 57% of the per student funding for university students.

International students have been critical revenue growth for the post-secondary sector. According to **The State of Postsecondary Education in Canada, 2024** report by Higher Education Strategy Associates, “international student fees have accounted for 100% of all increased operating spending since about 2010.” Revenue from international student fees rose 554%, versus only 23% for domestic students in the same time frame.

International student recruitment encouraged by the federal government

Through successive international education strategies and other initiatives, Global Affairs Canada leveraged Canada’s brand to increase international student recruitment. For example, the **International Education Strategy 2014-2019** sought to further Canada’s brand as a leading destination for scholars and echoed calls for a “clear long-term strategy [...] to ensure that Canada maintains and increases its market share of the best and brightest international students and researchers.”

Recruitment via the promise of immigration

Canada differentiated itself from its competitors in the race to recruit international students by offering the possibility of permanent residence. This has become an important part of the marketing of Canada abroad, whether by **provincial governments**, the federal government, or by **post-secondary institutions and education agents**.



"Wouldn't it be nice to apply all of your Canadian educational credentials and work experience to pursuing a career and building a life in Canada? Express Entry, the Provincial Nominee Program or the Atlantic Immigration Pilot can be your path to permanent residency. After all this, maybe you too can become Canadian, eh?"

*- Immigration, Refugees, and Citizenship Canada (IRCC) **promotional video***

The **International Education Strategy 2019-2024** makes numerous references to permanent residence, as well as the study-work-stay continuum.

The message of study and stay appealed to the global market for education, and it spread effectively. As an **international student in Brampton** said, "Everything we heard—from word of mouth, from immigration consultants and in promotional material from the Canadian government itself—gave us the impression [Canada] was a heaven for international students, a place to study, work and become a citizen."

Unsustainable growth undermines Canada's offer as a study destination

International student recruitment and enrollment expanded without sufficient oversight or accountability mechanisms. Although IRCC only issues study permits to enroll at institutions recognized by provinces and territories as Designated Learning Institutions (DLIs), there is no evidence that the DLI process has the rigour in criteria or enforcement to ensure that those post-secondary institutions who abuse the system lose their DLI status.

Certain institutions rapidly increased the proportion of international students on their campuses motivated by financial, rather than educational, goals. There have been numerous reports of **unethical recruitment practices**. And as the population of current and former international students grew, transition to permanent residence—a key driver of international student recruitment—became further out of reach for many international students.

Since 2023, the Study Landscape in Canada Has Shifted

Over the course of the last year, Minister of Immigration Marc Miller made a series of announcements that dramatically alter the international education landscape in Canada. The reforms have been primarily aimed at reducing the number of international students in Canada through annual caps on new study permits. They have also changed the value proposition of study in Canada, in terms of work and immigration opportunities. The reforms aligns with the government's aim to limit temporary permit holders to **5% of the population** by the end of **2026**.

Minister Miller has also introduced other changes that will affect international students and graduates, such as reforms to the **temporary foreign worker program** (TFWP) and revised immigration targets through an updated **Levels Plan**.

Collectively, the reforms to immigration and international student policies have eroded educational and career prospects for future international students, but also for those who are already in Canada.



Multi-permit reality means that policy changes affect those in Canada

For many international students, their visa and immigration journey in Canada can be characterized as multi-permit immigration. There are several reasons that international students may hold a series of temporary permits:

- Some international students obtain multiple degrees in Canada.
- International students with a longer course of study may need successive study permits to carry them to the end of their degree.
- International graduates may work after studies using successive work permits, for example first holding a post-graduate work permit (PGWP) and later a permit under the TFWP.

For example, a 2022 study found that **only 9% of international students** who were ultimately granted permanent residence (PR) got PR based on one level of study alone. The remainder either had study permits at multiple levels of study and/or one or more held work permits before getting PR.

Study permit caps, limited access to the PGWP, and restrictions on the TFWP will affect international students and graduates who had planned to apply for subsequent permits. It may shape their decisions about future fields of study, or it may make it impossible to transition from the PGWP to the TFWP while they wait to be invited to apply for permanent residence. And with lower targets for economic immigration, permanent residence may be even **farther out of reach** than before.

International students and graduates face dire choices

As current study permits and PGWPs expire, hundreds of thousands of international graduates will have to choose: either leave Canada without achieving what they set out to do, or stay in Canada without status. The policy changes, as announced, could lead to an unprecedented mass loss-of-status event. A large population losing immigration status is very poor outcome for Canada. But this event could be personally devastating for each international student affected.

It is no surprise, then, that current and former international students report a sense of deep **uncertainty and apprehension**. Study and career goals may reflect years of planning. The financial investment of international students into the Canadian post-secondary system is billions of dollars annually. But the personal and emotional investments students and their families have made to secure a future in Canada are beyond measure.

Increased incidents of anti-international student hate

The past year has seen public support falling for immigration, as well as an increase in hate directed at both **immigrants** broadly, as well as international students specifically. Harassment and hate speech, whether **online** or **in person**, exacerbate uncertainty and fear among international students in Canada. Statements, including those by politicians, that **blame international students for long-brewing economic woes** likely contributed to the rise of anti-international student and anti-South Asian hate, as well as further straining international student mental health.



Vulnerabilities in the International Student System Persist

The changes to the international student system were not designed with the intention of tackling systemic issues that have led to exploitation and vulnerability of international students. The current suite of changes will eliminate some fraudulent schools and programs, there is little evidence that the changes until now will substantially improve conditions for current and future international students or for international graduates. WES remains concerned about the lack of systems in place to ensure the well-being of international students and to ensure the well-being of the post-secondary sector more broadly. These concerns include:

- Unethical recruitment practices, for example as documented by CBC's *The Fifth Estate* episode "**Sold a Lie**"
- Disproportionate tuition fees paid by international students **compared to their domestic student peers**
- Inadequate access to services and social supports, including **mental health** supports
- Lack of student voices when decisions are made about international student policies and support systems
- Unsustainable funding model for the post-secondary sector

Recommendations

WES recommends that Immigration, Refugees, and Citizenship Canada (IRCC) implement measures that slow down the impacts of recent policy changes on international students and graduates currently in Canada. Furthermore, WES recommends that IRCC seize this moment of transition to significantly strengthen accountability within the international student system. Improving the conditions in which international students are recruited, study, and work will lead to better international student outcomes and strengthen Canada's reputation as a good place to study. Many of these recommendations could be implemented via a **Recognized Institution Framework**, a policy IRCC has proposed.

The below recommendations are the same as those on Page 1 of the brief, with further context and detail.

Enhanced coordination

The **IRCC Strategic Review** called for a whole-of-government and whole-of-society approach to immigration. WES agrees that success depends on actively engaging a wide range of stakeholders from all provinces, regions, and sectors of Canadian life. This is true for the immigration system as whole, and it also applies to international education. A coordinating body allows players within and beyond government to collaborate on objectives and implementation in a way that will ensure a more responsive and aligned system.



WES recommends creation of a collaborative, multi-sector roundtable to design and implement international student system accountability measures. Robust compliance, monitoring, and enforcement mechanisms must be a central priority of the roundtable.

Input from current and former international students

Without input from international students, there is a risk that decision making processes overlook the vulnerabilities faced by international students. The recent policy changes have not directly intervened in the systemic issues that enable such vulnerability and may in fact have deepened that vulnerability. International students have few formal channels to raise their concerns. Policymakers should seek feedback from international students who have been directly impacted by these policy changes. The Canadian Bureau of International Education recently called for an International Student Advisory Council to ensure more frequent and systematic engagement with international students on an ongoing basis.

WES recommends the establishment of an International Student Advisory Council to provide student feedback on the conditions faced by international students, as well as policy proposals that affect international students.

Pathways to permanent residence

Even before the policy changes of the last year, international students and graduates faced challenges navigating Canada's immigration system. Canada has over 50 permanent residence (PR) programs. Each has distinct eligibility criteria, and each is potentially subject to change. This makes it difficult for international students to predict their likelihood of achieving PR. The last year has been particularly volatile for immigration policy. Changes announced in 2024 affect the likelihood and timeline of transitioning to permanent residence. A longer timeline for PR, then, necessitates that an international student who wants to stay in Canada hold more consecutive temporary permits, but the TFWP rules have been changed as well. International students on a permit about to expire, especially a PGWP, have little time to ascertain what the new rules mean for them. No policy has been put in place to mitigate or delay the risk of loss of status for this group.

WES recommends that IRCC develop a stable pathway to permanent residence designed for international students, with clear eligibility criteria. IRCC should provide regular updates about applicant volumes and selection levels.

WES recommends that IRCC create a one-time temporary work permit for international students and graduates already in Canada. This will enable international students and graduates to navigate the immigration system changes announced in 2024 and plan for their future.

Support services

Moving to a new country and commencing a degree entails transition. And with transition comes challenges. Canada should ensure that supports are available to support the education, health, and well-being of international students. Support for international students varies widely across institutions and



jurisdictions, leading to inconsistencies in the quality of services provided. For example, international students may be eligible for settlement services in Quebec, and some municipalities offer assistance to international students. However, many provinces and municipalities offer no such services. Similarly, post-secondary institutions differ in the level of support they provide to international students and graduates.

WES recommends the creation of minimum standards, either at the provincial/territorial or the institution level, for essential services including academic, settlement, career, and immigration services, as well as health and mental health supports.

WES recommends that IRCC expand eligibility criteria for federally funded settlement services to allow provision of services to current and former international students.

Regulation of recruitment

The global reputation of Canada's education and immigration systems depends upon fair practices in recruiting international students. The complexity of Canada's systems—the post-secondary sector, as well as visa and immigration—means that international students are reliant on agents and legal representatives and vulnerable to misinformation. International students should be able to expect that information provided by the Canadian government, Canadian institutions, and any agents thereof is accurate and complete.

WES recommends the establishment of a dedicated regulatory body to oversee education agents, including aggregators and their subcontracted agents. This body would institute and enforce a standard of practice, as well as license agents and maintain a registry of licensed agents. Violations of regulatory standards would result in removal from the registry and revocation of licensure.

WES recommends that IRCC and Global Affairs collaborate with top sending countries to enable monitoring and enforcement of recruitment standards.

Financial health and tuition fees at the post-secondary level

The post-secondary sector is a public good. Canada cannot deliver on its goals without being able to provide educational excellence at the post-secondary level. Educational excellence requires more than funding, but educational excellence cannot be delivered in the absence of appropriate funding.

Budgetary pressures have contributed to the ambitious, and sometimes unscrupulous, recruitment of international students. This has been enabled by a regulatory gap, with no rules governing how much post-secondary institutions can charge international students.



WES recommends that the Canadian government incentivize provinces and territories to develop a funding strategy that ensures the long-term fiscal health of the post-secondary sector without financial dependence upon international students.

WES recommends that the Canadian government incentivize provinces and territories to prohibit exorbitant differences in tuition fees between domestic students and international students. WES advocates for a consultation process involving stakeholders, such as post-secondary institutions, student representatives, and policymakers, to establish fair tuition fee structures for international students.

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 Canada Programs team, 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).