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## Canadian Bureau for International Education

### Submission to the Government of Canada's National Conversation on Immigration

#### August 2016

#### 1) Strengthening our Canadian fabric

- **How many newcomers should we welcome to Canada in 2017 and beyond?**
- **How can we best support newcomers to ensure they become successful members of our communities?**
- **Do we have the balance right among the immigration programs or streams? If not, what priorities should form the foundation of Canada's immigration planning?**

Since assuming his role as Minister of Immigration, Refugees and Citizenship Canada, the Honourable John McCallum has stated on many occasions that international students are at the top of the list to become permanent residents because of their language skills, education and age. They also have a proven desire to be here, with a level of familiarity and understanding of Canada. They can provide economic, social and political links to their home countries, and add to the multi-cultural fabric of our society.

As Canada's national international education organization, the [Canadian Bureau for International Education](#) (CBIE) wholeheartedly supports this position. However we must recognize that if international students are 'ideal' immigrants, they are not necessarily 'immediate' ones. Where some international students proceed directly to permanent residency, for most it is not a linear path and there are many barriers en route. First and foremost, more research - quantitative and qualitative - is needed to better understand the full breadth of these different pathways and challenges.

CBIE survey data (*CBIE World of Learning*, 2015) indicates that 50 percent of international students intend to seek permanent residence status in Canada following their studies. A recent federal report (Statistics Canada, *International students who become permanent residents*, 2015) found that, depending on the year of arrival between 1990 and 2013, between 20 percent and 27 percent of international students became permanent residents in the 10 years after their first study permit was issued. Although these two reports cannot be directly compared, it is clear that a significant number of international students who want to become permanent residents are not / cannot.

CBIE welcomes the proposed changes to Bill C-24 as an important first step to facilitate international students' transition to permanent residents and citizens. Yet, as elaborated upon below, more can and should be done to foster a more welcoming and straightforward pathways for students from around the world on their journeys to becoming Canadian permanent residents and citizens.



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Regarding international students in Canada, the Government of Canada has the stated goal of doubling the number to more than 450,000 by 2022 (Government of Canada, *Canada's International Education Strategy*, 2015). It is true that Canada's international student population has grown significantly, from 184,155 in 2008 to 357,762 in 2015, representing an overall increase of 94 percent. This is reflective of global trends and a highly competitive market where Canada consistently ranks 5<sup>th</sup>/6<sup>th</sup> globally along with our main competitors, the US, UK, Australia, Germany and France. In recent years, countries such as China, New Zealand and Malaysia have made a very strong showing in attracting international students. Moreover, while increases of international students were above 10 percent year over year between 2011 and 2014, the increase dipped to 6 percent between 2014 and 2015 showing that we cannot take Canada's reputation for excellence in education for granted. In response to question 4 below, CBIE provides concrete recommendation for how Canada can attract the best global talent and international students in a highly competitive international market.



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## 2) Unlocking Canada's diverse needs

- How can immigration play a role in supporting economic growth and innovation in Canada?
- Should there be more programs for businesses to permanently hire foreign workers if they can't find Canadians to fill the job?
- What is the right balance between attracting global talent for high-growth sectors, on the one hand, and ensuring affordable labour for businesses that have historically seen lower growth, on the other?
- How can immigration fill in the gaps in our demographics and economy?
- What Canadian values and traditions are important to share with newcomers to help them integrate into Canadian society?

In responding to this question, CBIE members were unequivocal about the importance of international students as drivers of business, industry and innovation - firstly as students and in the longer term as active members of, and contributing citizens to, Canadian society and the economy. Values cited included inclusiveness, respect, mindfulness, sense of possibility and opportunity, rule of law and humanitarianism.

Yet responses focused not so much on “what” to integrate but how to integrate. Again, although international students are considered a potential pool of prized immigrants, transitions are not instantaneous. Government-funded support for integration is essential for success. As one CBIE member stated, “... a national immigration strategy is only as good as the social infrastructure that supports it.” In this respect, it is also important to acknowledge the need to support the spouses and children of international students in integrating into Canada alongside the students themselves. On this point, the regulation imposing a maximum four-year work permit greatly impacts opportunities for spouses to accompany international students in the first place, especially those students who come to complete PhD programs.

Labour market integration support, directed both to international students and employers, is also important. On one level, international students need career advice just like domestic students, recognizing that sometimes additional supports are required vis-à-vis language nuances, soft-skills and interview techniques (supports provided to many newcomers which international students cannot access). A 2015 international report (The Expert Council of German Foundations on Integration and Migration, *Train and Retain – Career Support for International Students in Canada, Germany, the Netherlands and Sweden* 2015) underscores the need for career and job support to start early – and continue throughout – international students' academic careers. An important way the Government of Canada could be helpful in this regard is to reduce the processing times for coop work permits which, although at one point over the past year was at a low of one-month average processing, has again soared to a three-month average. Expediting coop work permits would not only allow international students to complete the necessary requirements



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of their programs for graduation, it would facilitate labour market exposure, professional networking opportunities, job skills etc.

Further, the federal government should continue to support initiatives such as COSTI's International Student Connect (a pilot co-funded by the Government of Canada and Province of Ontario), a program which supported collaboration among post-secondary institutions and immigrant/settlement organizations to provide post-graduation services to international students in innovative and resourceful ways.

Government-funded labor market integration efforts need to also focus on employers. A report out of York University (Desai-Trilokekar, Thomson, El Masri, *International Students as "ideal" immigrants: Ontario employers' perspectives*, 2016) explains that employers see international students as "risky hires" due to complicated immigration policies and lengthy procedures, and delineates a number of other perceived and real issues among employers, all of which underscore the need for immigration-specific information/training, and promotion of diversity, particularly for Canadian small and medium-sized enterprises.



### 3) Modernizing our immigration system

- What modernization techniques should Canada invest in for processing of applications?
- What should Canada do to ensure its immigration system is modern and efficient?
- Is there any rationale for providing options to those willing to pay higher fees for an expedited process?

No amount of modernizing Canada's immigration system will have the intended effects unless it results in a reduction of processing times. The importance of processing times for the recruitment of international students is detailed in section 4. It is important here to state that any new frameworks and mechanisms developed must be adequately resourced in their implementation, as modernized services are only as effective as the availability of timely, case-specific information for applicants.

CBIE members made a number of process recommendations, including:

- The ability to make minor changes / revisions / clarifications to existing applications would avoid unnecessary delays and/or applications not being processed / rejected outright.
- Improvements to the call centre are urged so that applicants can connect to an agent in a more timely matter and with greater confidence in the consistency of the responses. Similar points of service should be provided to applicants abroad, as visa offices often do not provide phone contact numbers for quick and efficient service.
- Increased intra-ministry cooperation (IRCC, CBSA, Services Canada, Global Affairs Canada) would also help ensure better coordination and systems efficiencies.

#### *Visiting Students / Research Interns*

Another issue that surfaced among CBIE's members in regards to improving our immigration system is in regards to visiting students and research interns. International students who seek to come to Canada on a temporary basis as visiting students and research interns face hurdles to obtaining necessary work permits. While some fit into the already established guidelines for Labour Market Impact Assessment exemptions, there is much inconsistency. It is important for Canada's competitiveness in international education and efficiency for a modernized system to have clear processes for these students and, ideally, one broad exemption category.

#### *Post Graduate Work Program (PGWP)*

After completion of studies, one pathway for international students seeking permanent residency is the post-graduate work program (PGWP). As indicated above, 50 percent of international students surveyed by CBIE in 2015 intended to apply for permanent residency. Although government data indicate that half of international students are approved for PGWP permits and uptake in the PGWP has grown substantially in the past decade (from 3,417 in 2004 to 73,091 in 2014) there has not been a corresponding conversion to permanent residency. The proportion of



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PGWP holders who obtain permanent residency as a percentage of the overall total remains minuscule: 1.7 percent in 2011 and 3.8 percent in 2015. Although there have been refinements to the program over the years, including expanding the permit length and eligible professions, more needs to be done. For instance, many undergraduate students apply for their PGWP and then decide to pursue graduate studies soon thereafter, and there is no way for them to relinquish the unused portion later on as PGWP permits are issued for a one-time use only.

Another example is that many international student graduates from foundation and apprenticeship programs in the trades do not qualify for the PGWP and as a result Canada is losing out on a source of labour/manpower for many in-demand professions such as electricians, millwrights/ machinists and heavy duty mechanics. Regarding such professions, it is important to further note that the fact that there are few work permit opportunities to support them in completing apprenticeships might be the key reason why there are few international students studying in the trades.

Further, the transition from international students to PGWP holders can be undermined by lack of employer-facing information to potential employers about the ability for PGWP applicants to work while awaiting a decision, and by the lack of a mechanism for an online applicant to prove they have submitted their application.

#### *Express Entry*

In pursuit of permanent residency, international students, as with all Canadian Experience Class, Provincial Nominees Programs, Federal Skilled Worker Program and the Federal Skilled Trades Program applications, must apply through the Express Entry electronic application management system launched in January 2015. As CBIE noted in its 2015 *World of Learning* report, this process created an additional step for international students, and one that is more competitive, as they are placed in a pool alongside all other applicants. Although the Government of Canada's Express Entry Year-End Report 2015 notes that active candidates in the pool, who have ever possessed a study permit, have a higher median Comprehensive Ranking System (CRS) than others in the pool at a score of 408, only 707 (9 percent of total applicants who had ever possessed a study permit) scored above 451. This is important because in the 23 invitation rounds in 2015 the CRS cut-off ranged between 456 and 886. CBIE, its members and partners would welcome the opportunity to work with government officials to explore ways to enhance the CRS to better recognize international students, including how and when to recognize Canadian credentials and Canadian work experience that falls outside of the current prescribed National Occupation Codes.

#### *Expedited Fees*

CBIE does not advocate for higher fees for an expedited process, however if such fees are ever garnered they should be directly invested in supporting permit processing to support peak times and reducing other bottlenecks.



#### 4) Leadership in global migration and immigration

- Is it important for Canada to continue to show leadership in global migration? If so, how can we best do that?
- How can Canada attract the best global talent and international students?
- In what ways can Canada be a model to the world on refugees, migration and immigration?

In section 1 data was provided on the international student population in Canada. CBIE has three key recommendations to ensure that Canada remains competitive in attracting global talent and international students:

##### 1) *Reduce visa processing times:*

In the 2015 CBIE international student survey, 9 percent of respondents indicated that acquiring their Canadian study permit was a significant hurdle for them when there were applying to study here. Although off-shore processing times of study permits declined slightly between 2001 and 2014, they increased 30 percent between 2014 and 2015. CBIE advocates for the expansion of innovative programs such as the Canadian Express Study Program (Vietnam), Student Direct Stream (China) and Student Partner Program (China/India) not only to more priority regions/countries but across the education spectrum to include K-12 and all PSE students.

In 2015 in-Canada study permit renewals and work permit processing reached high levels, and have not diminished through 2016. Where Australia's service standards for in-country international student study visas are between 14 and 30 days and 7 days for work visas, in-Canada processing times, as of July 11, 2016, ranged between 3 and 17 weeks for new/renewed study permits and between 4 and 16 weeks for new/renewed work permits. CBIE is also worried that new regulations, such as the one requiring international students to re-apply for study permits after they complete their pre-requisite requirements, will only increase in-Canada processing times further.

##### 2) *Increase scholarship funding for international students:*

In CBIE's 2015 international student survey, 52 percent of respondents indicated that availability of financial support to study in Canada was "essential" or "very important" to their decision to study in Canada. As [The Advisory Panel Report](#) for Canada's *International Education Strategy* (2012) noted:

“Attracting top talent also requires a competitive scholarship environment. Although Canada has invested substantially in graduate and post-doctoral scholarships, not enough of them support international students. Only 25 percent of the Vanier Canada Graduate Scholarships (Vanier CGS) and 31 percent of the Banting Postdoctoral Fellowships were awarded to



international students in 2011–2012. Many of the awards funded under the Canada Graduate Scholarships Program are not open to international students. In comparison, Australia has just increased its graduate scholarships to 10,000, and the United States is estimated to have 100,000 scholarships. In both cases, the majority are available to international students.” (page ix)

The Advisory Panel proceeded to recommend branding Canada through scholarships for international undergraduate students, with federal government co-funding 8,000 new Canada scholarships for top international undergraduate students and regroup grants and scholarships available to international graduate students and post-doctoral fellows under one label/brand with a focus on priority areas aligned with Canada’s innovation and prosperity agenda. CBIE supports both of these recommendations as a way of ensuring Canada continues to attract high quality international students into universities and colleges a highly competitive global environment.

Further, in supporting the expansion of scholarships for international students, CBIE includes international refugee students. Additional financial aid, combined with provisions for an immigration framework which allows refugee students to come to Canada to take up their studies (with the possibility of eventually settling), should be a central consideration in Canada’s response to current and future international refugees crisis.

3) *Ensure clarity in the International Student Program (ISP) and consistent pathways to permanent residency and citizenship for international students post-graduation:*

Through CBIE's consultation process, the collective answer of a number of institutions was that resolving unclear areas within the International Student Program (ISP) would be one of the best ways to put Canada in a better position to recruit and retain students. Although CBIE's Immigration Advisory Committee continues to work with IRCC representatives on a number of "gray areas" in ISP regulation and policy, we would welcome deeper and wider consultations with the Ministry leading to authoritative answers and communications on policy and procedural changes.

Clarity is needed not only about studying in Canada, but also on the pathways for remaining in Canada upon completion of studies. In CBIE's 2015 international student survey 59 percent of respondents indicated the opportunities for permanent residence in Canada was "essential" or "very important" to their decision to study in Canada. In addition to the many qualities of Canadian society and education, government representatives, schools, organization and recruiters alike promote the possibilities post-graduation for international students as a benefit of studying in Canada. However, when international students have to clearly demonstrate their intention to return





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home as a condition of being accepted to study in Canada, this creates an impression that they are not necessarily welcome for the longer term.

Although Canada's framework for transitioning from international student to permanent resident is considered generous in comparison to many countries it is complicated, especially when one factors in Provincial Nominee Programs. In the past decade there has been a multitude of changes in regulations in all jurisdictions, which further confounds the process for students, employers, institutions and stakeholders, even when changes are beneficial. Moreover, it should be noted that other countries such as Australia are improving their post-graduation pathways for international students, understanding that these pathways give a competitive advantage.

If the federal government wants to integrate international students for the value-added assets that they bring to our economy and society, it needs - in conjunction with its provincial and territorial counterparts- to ensure that clear-cut and consistent policies, procedures and pathways are in place to help facilitate both students coming to Canada and the transition of these students to permanent residents and citizens. A good practice that was cited in that came forward through CBIE's consultation with member institutions was that found in Quebec, wherein the Ministry of Immigration, Diversity and Inclusion offers information sessions on campus and online (in collaboration with institutions) to promote the Quebec Experience Program (PEQ) and answer questions from students who wish to apply for permanent residency. This service is popular with students and sends a clear message of commitment to retention of international students.