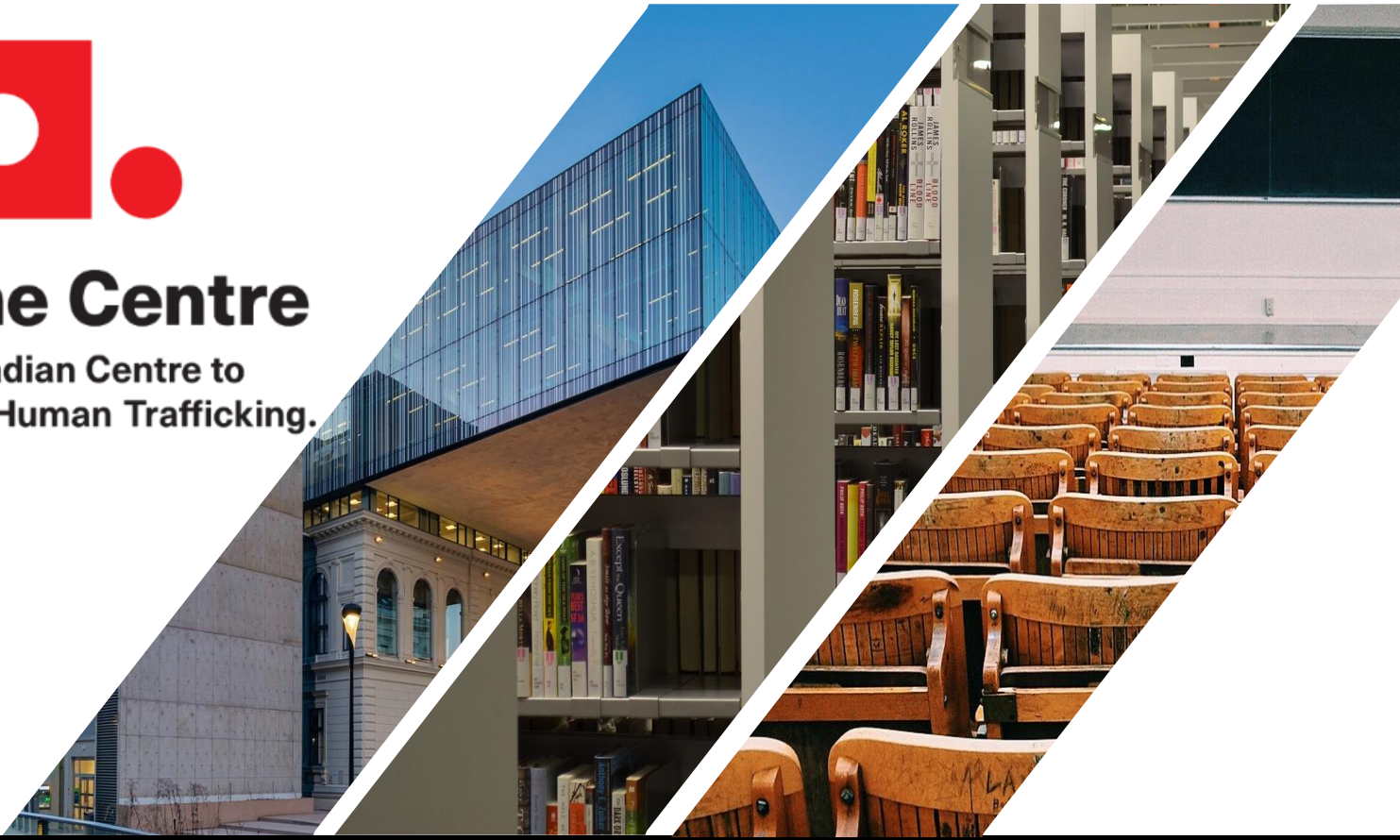




# The Centre

Canadian Centre to  
End Human Trafficking.



## Protect International Students Now

Written submission for the 2024 federal pre-budget consultation

September 2023

September 13, 2023

The Honourable Marc Miller, P.C., M.P.  
Minister of Immigration, Refugees and Citizenship  
House of Commons  
Ottawa, ON  
K1A 0A6

Dear Minister:

On behalf of the Canadian Centre to End Human Trafficking, I want to congratulate you on your new role as Minister of Immigration, Refugees and Citizenship!

As you may know, the Canadian Centre to End Human Trafficking (“The Centre”) is a national charity dedicated to ending all types of human trafficking in Canada. The Centre works with diverse stakeholders, including survivor leaders, governments, businesses, and frontline service providers to advance best practices and eliminate duplicate efforts across Canada. In 2019, The Centre launched the Canadian Human Trafficking Hotline, providing a free, confidential, multilingual service, operating 24/7 to connect victims and survivors, Canada-wide, with a variety of services and supports.

As you know, Canada has seen dramatic growth in the number of international students that have entered the country over the past decade. At the end of 2022, the international student population in Canada was over 800,000. This represents a 31% increase from 2021, and an astounding three hundred percent increase since 2012.<sup>1</sup>

International students’ contributions to the Canadian economy have grown considerably over this period. By paying higher tuition costs than domestic students, this cohort provides a significant source of revenue for colleges and universities.<sup>2</sup> Canadian employers are also benefitting from the large pool of young, skilled labour. Between 2000 and 2018, the number of international students with paid employment grew from 21,800 to 277,400.<sup>3</sup> The impact that international education has on the economy now exceeds Canadian exports of auto parts, lumber, or aircraft.<sup>4</sup>

Unfortunately, international students continue to face challenges that make them vulnerable to exploitation, abuse and trafficking. These challenges include:

- **Misinformation on their rights and entitlements in Canada.** Many students rely on education recruiters and immigration consultants for information about programs, studies, and life in Canada. The College of Immigration and Citizenship Consultants oversees and licenses Regulated International Student Immigration Advisors (RISIAs) to reduce the chance of fraud and exploitation,<sup>5</sup> regardless of whether they operate in Canada or internationally. Unfortunately, some recruiters still mislead students and downplay barriers related to finding employment and affordable housing, and obtaining permanent residency.
- **Lack of access to social and settlement services.** International students are not eligible for federally-funded settlement services or provincially-funded income assistance and housing supports. Colleges and universities are not equipped to manage settlement programs for students, and on-campus services are not always sensitive to the intricacies of students' cultural backgrounds and language needs.<sup>6</sup> The lack of access to Canada's social safety net leaves international students vulnerable to poverty, abuse, and trafficking.
- **Limited access to work opportunities.** Many international students must work to pay for tuition, housing, and living expenses. Despite perceptions that international students are wealthy, many come from families with modest incomes.<sup>7</sup> It is not uncommon for these families to take out loans to support their children, placing an added layer of financial stress on students. Until last year, international students could only work a maximum of 20 hours per week and many turned to the underground economy to cover their expenses. This left many vulnerable to exploitation and human trafficking. In September 2022, the Government of Canada established a pilot program that temporarily removed the 20-hour-per-week restriction on working during full-time studies<sup>8</sup>. The Canadian Centre to End Human Trafficking supports this policy change. However, the expiry of this pilot program at the end of 2023 has created uncertainty and concern among students. Reverting back to the 20-hour work restriction after 2023 would place students in a more vulnerable position.

**In response to these challenges, the Canadian Centre to End Human Trafficking calls on the Government of Canada to:**

1. Launch a process to renew and strengthen Canada's International Education Strategy, which is set to expire in 2024. Among other things, the evaluation should:
  - a. Assess the effectiveness of the study permit program in ensuring that students are protected from abuse and exploitation; and

- b.** Engage international students, post-secondary institutions, provincial governments, front-line service agencies, and other stakeholders to identify the process challenges students face when trying to study, work, and remain in Canada.

The new strategy must include a requirement for post-secondary institutions to build dormitories and housing that meet the needs of the international students they enroll.

- 2.** Expand eligibility to federally-funded settlement services to include international students.
- 3.** Immediately and permanently eliminate the rule that restricts international students from working more than 20 hours per week. Permanently lifting the 20 hour cap will provide students with the assurance that they will be able to continue to support themselves while living in Canada. It also means that students will be less vulnerable to a “boyfriend” trafficker, and less likely to choose risky work to cover tuition and basic needs.
- 4.** Standardize oversight mechanisms for education recruiters, including those operating outside the country, by:
  - a.** Signing the *Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants* (known as the “London Statement”).<sup>9</sup> The agreement - which has been signed by the United Kingdom, Australia, New Zealand and Ireland - provides an ethical framework and seven principles to “promote best practice among the education agents and consultant professions that support international students.” Once signed, countries implement training, regulation, and oversight to ensure recruitment agencies abide by the terms of the London Statement.
  - b.** Encouraging all provinces to implement standards that post-secondary institutions must follow when admitting international students. The standards should include informing students of their rights in Canada, providing access to social services, monitoring and evaluating relationships with education recruiters, and informing students how they can access support if they are being exploited.<sup>10</sup>

5. Work with countries of origin and international institutions, such as the International Organization for Migration (IOM), to monitor and combat misinformation that misleads international students about education and citizenship opportunities in Canada.

We believe that implementing these recommendations will help reduce international students' vulnerability to trafficking so they may continue to thrive in Canada.

Congratulations, again, on being appointed Canada's Minister of Immigration, Refugees and Citizenship! We look forward to working closely with you and your staff to make Canada's immigration safer for migrants, international students, and refugees. I would welcome the opportunity to speak with you about our recommendations – and how we might support your vital work – at your earliest convenience.

Yours sincerely,



**Julia Drydyk**

Executive Director

Canadian Centre to End Human Trafficking

**cc.**

The Honourable Dominic LeBlanc, P.C., M.P., Minister of Public Safety, Democratic Institutions and Intergovernmental Affairs

The Honourable Mary Ng, P.C., M.P., Minister of Export Promotion, International Trade, and Economic Development

The Honourable Seamus O'Regan, P.C., M.P., Minister of Labour and Seniors

## Endnotes

<sup>1</sup> Immigration, Refugees, and Citizenship Canada. (2023). [Study Permit Holders on December 31<sup>st</sup> by province/territory and study level](#). Retrieved June 19, 2023.

<sup>2</sup> International students are responsible for almost 40% of all tuition fees across Canada. Hune-Brown, N. (August 18, 2021). [The Shadowy Business of International Education](#), The Walrus. However, they make up only 17% of the post-secondary student population. Statistics Canada. (2022). [Table 37-10-0086-01 Postsecondary enrolments, by status of student in Canada, country of citizenship and gender](#). Retrieved June 19, 2023.

<sup>3</sup> Crossman, E., Youjin, C., and Hou, F. (November 24, 2021). [International students as a source of labour supply: Engagement in the labour market during the period of study](#). Statistics Canada Economic and Social Supports

<sup>4</sup> Government of Canada. (2019). [Building on Success: International Student Strategy \(2019-2024\)](#).

<sup>5</sup> College of Immigration and Citizenship Consultants (CICC). [Who We Are](#). Retrieved September 6, 2023.

<sup>6</sup> Keung, N. (December 4, 2021). [‘No parents should have to bury their child’: How a Canadian funeral homeowner is trying to stop suicides among international students](#). Toronto Star. Retrieved June 19, 2023.

<sup>7</sup> One Voice Canada. (2021). [Report on the realities for international students: evidenced challenges](#), p. 6.

<sup>8</sup> Government of Canada. (October 7, 2022). [International students to help address Canada’s labour shortage](#). News Release. Retrieved June 19, 2023.

<sup>9</sup> British Council (2012). [Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants](#). Retrieved September 6, 2023.

<sup>10</sup> An example of this is Colleges Ontario’s [Standards of practice for international education](#) released in March 2023. To date, 23 public colleges have signed on. Retrieved September 6, 2023.