

REPRESENTING THE PROBLEM OF (UN)ETHICAL PRACTICES IN CANADA'S POST-PANDEMIC INTERNATIONAL STUDENT POLICY LANDSCAPE

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Abstract

This study investigates how the Canadian policy landscape toward international students has changed since the pandemic. It uses a policy mapping of 97 announcements made between January of 2022 and March of 2024 by the federal government, the governments of Ontario and Quebec, and three organizations with expertise in international or higher education. Using the “What’s the Problem Represented to Be?” (WPR) approach, the article analyses the increasing attention being paid to (un)ethical practices as a lens through which policy bodies are constructing the role of international students in Canada. This highlights the differing representations of the “problem” of ethical practices, as well as the call-and-response nature of announcements between policy actors. The focus on ethical practices has created links between international students and national issues such as housing shortages and labour market needs, assigning responsibility to unscrupulous actors but also to students themselves for creating these challenges.

Keywords: international students, international education policy, Canada, ethical practices, What’s the Problem Represented to Be approach, Canadian higher education

Résumé

La présente étude porte sur les changements intervenus au Canada, depuis la pandémie, au chapitre des politiques concernant les étudiants étrangers. Elle repose sur une cartographie des politiques réalisée à partir de 97 annonces faites entre janvier 2022 et mars 2024 par les gouvernements fédéral, ontarien et québécois ainsi que par trois organisations spécialisées en enseignement international ou supérieur. Au moyen de l’approche par questionnement WPR (What’s the Problem Represented to Be), l’article s’intéresse à l’attention croissante portée aux pratiques éthiques (ou contraires à l’éthique) comme prisme à travers lequel les instances responsables des politiques construisent le rôle des étudiants étrangers au Canada. L’article met ainsi en lumière les diverses représentations du « problème » des pratiques éthiques ainsi que la dynamique action-réaction inhérente aux annonces des décideurs. L’accent mis sur les pratiques éthiques a eu pour effet d’établir des liens entre l’effectif étudiant étranger et des problèmes sévissant au pays, sur la scène du logement ou du marché du travail, par exemple, et d’en imputer la responsabilité à des acteurs sans scrupules, mais également aux étudiantes et étudiants eux-mêmes.

Mots-clés : étudiants étrangers; politique d’éducation internationale; Canada; pratiques éthiques; approche « What’s the Problem Represented to Be »; enseignement supérieur au Canada

INTRODUCTION

Canada has long positioned itself as a major player in the recruitment of international students (IS), deploying federal and provincial policies on immigration and education to attract and retain increasing numbers of IS (Sá & Sabzalieva, 2018; Sabzalieva et al., 2022). After rebounding from the peak pandemic years, the IS population reached a record high of over one million in 2023 (“Canada hosted,” 2024) and, in 2022–2023, IS made up 21.2% of the entire student body in Canadian post-secondary education programs (Statistics Canada, 2024). International education has become woven into Canada’s policy fabric, institutionalized by the publication of government international education strategies and the involvement of an ever-widening range of government and education policy actors (El Masri & Trilokekar, 2023; Tamtik et al., 2020). However, this policy framework appeared to unravel in January of 2024, when the federal government announced that, for the first time ever, caps would be placed on the number of IS coming into Canada. (Immigration, Refugees, Citizenship Canada [IRCC], 2024a)

The over-reliance on IS recruitment as an international education policy priority has always presented risks for Canada (and other high-IS recruiting countries), as demonstrated during the COVID-19 pandemic and in the current period of geopolitical volatility (El Masri & Trilokekar, 2023; Hutcheson, 2024). Moreover, in Canada—and beyond—a wave of anti-IS sentiment is being fueled by a combination of the lingering impact of the pandemic, political populism, geopolitical change, social challenges, and racism (Harden-Wolfson et al., 2024). In Ontario, where the highest number of IS in Canada are located, a domestic housing crisis has been erroneously attributed to the high number of IS in the province, even as accounts abound of the difficulties and abuses faced by under-housed or poorly housed students (Su et al., 2023). In neighbouring Quebec, the government’s oscillating culturally nationalist/fiscally conservative outlook (Béland et al., 2023; Graefe & Rioux, 2020) has led to proposals that will effectively penalize the province’s anglophone universities for recruiting

out-of-province undergraduates and IS (Usher, 2023). Across all provinces, growing financial dependence on IS fees is proving increasingly unsustainable (Patel, 2022).

Changes in the policy landscape and rhetoric around IS since the pandemic indicate that they are no longer being portrayed as the “ideal immigrants” they were once perceived to be (Sabzalieva et al., 2022). While IS continue to be valued economically for the revenue they generate for higher education and have become integral to Canada’s immigration strategy, they are simultaneously admonished due to their temporary status and country of origin, especially for IS who are racialized in/by Canada (Harden-Wolfson et al., 2024; Hutcheson, 2023; Waruru, 2023). These changes and contradictions led to our research questions, which ask: How has the Canadian policy landscape toward IS changed since 2022? And how do recent policies that have been proposed and/or implemented construct the role of IS in Canada?

Covering the period of January of 2022 to March of 2024¹, we mapped 97 policy announcements referring to IS made by the federal government, two high-IS recruiting provincial governments (Ontario and Quebec), and three organizations that have expertise in international or higher education in the Canadian context: the Canadian Bureau for International Education (CBIE), Universities Canada, and Colleges and Institutes Canada (CICan). As part of the policy mapping, we identified nine overarching themes into which the announcements were categorized: economic strategy, ethical practices, financing, Francisation², global commitment, immigration, recruitment, retention, and student well-being. An important finding of this

- 1 This study commenced in early 2024 and the original end date for data collection was December 31, 2023. However, following the major federal government announcement of an IS policy cap and the Quebec government’s announcement of new language requirements, the end date was extended to March 31, 2024.
- 2 The process of expanding the use of French language whether voluntarily or by mandate, and currently a policy priority in Quebec.

analysis was the increasing attention paid by policy bodies to the category we term ethical practices: announcements relating to perceived fraudulent behaviours by different actors in the international student recruitment process, plus announcements about the exploitation of immigration and of IS themselves. As a heuristic for analyzing how problems are represented in policies, we applied the “What’s the Problem Represented to Be” (WPR) approach (Bacchi, 2009; Bacchi & Goodwin, 2016) to better understand the emerging policy problem of (un) ethical practices in the post-pandemic terrain of IS policy making in Canada.

The next section summarizes federal and provincial policies towards IS, starting in 2002 with the launch of the federal International Student Program. Establishing this landscape contextualizes our study of the “post-pandemic” period from 2022 onward. We then outline the policy mapping methodology before explaining the WPR approach. This sets the scene for the subsequent analysis of policy announcements in the ethical practices category, which begins with a timeline of events before analyzing the six questions laid out in the WPR heuristic. In the Discussion section, we examine how the policy announcements relating to ethical practices both absolve and blame IS for fraudulent behaviour. In concluding, we touch on developments that have occurred following March of 2024 and address the limitations of this study with suggestions for future research.

CANADIAN POLICIES TOWARD INTERNATIONAL STUDENTS, 2002–2021

Policy discussions on international education in Canada gained momentum at the federal level from the late 1970s onward and have continually shifted in recent decades (McCartney, 2021; Sabzalieva et al., 2022). Federal immigration policies are particularly influential as they affect the legal status of IS in Canada, their ability to work while studying, and whether they can stay in the country post-graduation. The *Immigration and Refugee Protection Act* of 2002 signifi-

cantly influenced federal policy, informing the further development and implementation of the International Student Program (Citizenship and Immigration Canada [CIC], 2010; Sabzalieva et al., 2022). An evaluation of the International Student Program in 2010 indicates that it was driven by economic growth imperatives, leading to new policies on permanent residency transition (CIC, 2010; Sabzalieva et al., 2022). Aligning with rationales of economic and immigration growth, this evaluation also assessed the development of the federal Post-Graduation Work Permit program, which had been expanded in 2008 to allow IS from all provinces and territories to work in any job in Canada for a maximum of three years after their studies (Brunner, 2022; CIC, 2010). The evaluation also revealed a need for greater monitoring of international education, which led to provincial governments being given greater accountability for this domain (CIC, 2010). In 2014, federal regulatory changes transferred additional responsibilities for IS compliance reporting to “Designated Learning Institutions”³; that is, higher education institutions (HEIs) that were permitted to issue study permits (Brunner, 2023). These changes responded to federal immigration concerns that study permits were being used as a means to enter Canada for work rather than study, and to target HEIs of suspect quality (Brunner, 2023).

In the same year, the first federal International Education Strategy was released, emphasizing the economic rationale of IS recruitment and retention (Global Affairs Canada [GAC], 2014) and extending the connections between IS and Canadian immigration demands (McCartney, 2021; Sabzalieva et al., 2022). A second evaluation of the International Student Program in 2015 found that it was an important strategy for the federal government to achieve the targets in the International Education Strategy (CIC, 2015). However, there were some inconsistencies between the demands of the International Education Strategy and the International Student Program, such as the fact that visa pro-

3 Except Quebec, which has its own system of designating eligible institutions.

cessing times were not able to keep up with demand from an increasing IS population (CIC, 2015). The second iteration of the International Education Strategy (2019–2024) also centred global competitiveness and the importance of IS in supporting Canada’s educational sectors and socio-economic development, introducing the idea of diversifying IS recruitment source countries (GAC, 2019).

At the provincial level, the main focus of Ontario government policies between 2002–2018 was financing, which included the introduction of the Trillium Scholarship in 2010 and funding policies for HEIs to expand the IS population (El Masri, 2020; Trilokekar & El Masri, 2020). Ontario published its first international education strategy in 2018, which, like its federal counterpart, was driven by economic needs and soft power development (Trilokekar & El Masri, 2020). In Quebec, the provincial government has largely instituted its own international education policies since the 1960s rather than following federal initiatives (Barbarič, 2020). Francisation and cultural integration are important elements influencing Quebec’s IS policy. For example, the Quebec government has an active tuition exemption policy and mobility agreement that primarily targets IS from some francophone countries (Gouvernement du Québec, n.d.; Ministère de l’Enseignement supérieur, 2024).

The COVID-19 pandemic marked a shift in IS policy at the federal level (Brunner, 2022; El Masri & Sabzalieva, 2020; Hutcheson, 2024). Most immigration policy changes were coping strategies to relieve national economic stress, including exemption from travel bans for some foreigners, removing the working hour cap, updating the eligibility criteria for post-graduation work permits, and enhancing the previous Student Direct Stream program (Hutcheson, 2024; IRCC, 2020; Matsumoto & Viczko, 2023). In Ontario, international education policies released during 2020 did not sufficiently or specifically target IS (El Masri & Sabzalieva, 2020), whereas in Quebec, the pandemic revealed policy flaws such as the limited access of IS to health care in provincial public health policy (Hutcheson, 2024).

By the start of 2022, when data collection for this study began, economic reasoning was still at the forefront in justifying policy relating to IS, but against a more complex backdrop with the rise of other factors, such as ethical challenges and sociocultural issues that had been brought under the spotlight due to the pandemic.

MAPPING THE POST-PANDEMIC POLICY LANDSCAPE

To investigate the shifting IS policy landscape in the wake of pandemic-era changes, we conducted a policy mapping to systematically document and analyze government policies impacting IS. We carried out a first round of exploratory searches of all types of announcements (e.g., commentary, statements, media advisories, speeches, and news releases) published by four government agencies—our primary policy sources. Two were federal—Global Affairs Canada (GAC) and Immigration, Refugees and Citizenship Canada (IRCC)—and two were provincial—Ministry of Colleges and Universities in Ontario (MCU) and Quebec’s Ministry of Education (MoE). We used the search terms “international student” and “international education” as well as manually scanning through announcements for relevancy. In the second round, we selected three organizations as secondary policy sources: Canadian Bureau for International Education (CBIE), Universities Canada, and Colleges and Institutes Canada (CICan). We define primary policy sources as creators and enforcers of policy, whereas secondary policy sources are organizations with expertise in international or higher education in the Canadian context and which provide context for how the primary sources are understood from a semi-outsider perspective.

An initial yield of 131 policy announcements were reviewed for relevancy and selected if they met the following inclusion criteria:

- Published between January 1, 2022, and March 31, 2024.
- Contained a clear connection to international students (not tangential or requiring inference or implied connection).

- Had some relationship to a pre-existing and/or new policy, either by being explicitly mentioned in the policy announcement or using broader terms to identify specific policies.

After identifying announcements, they were recorded in an Excel spreadsheet that included policy source, announcement date and title, a brief description of the policy announcement, a list of related policies linked to the policy announcement, the government agencies related to the policy, the level involved in policy making (e.g., policy operating at the global, national, or federal level), and the issues addressed by the policy. This approach enabled us to understand the overall scope of the policy landscape, how the policies are described, and how they relate to each other, reinforce each other, and subsequently impact IS. During the mapping process, we also identified the main issues addressed by each announcement and categorized these using thematic keywords. Nine categories were developed: *economic strategy*, *ethical practices*, *financing*, *Francisation*, *global commitment*, *immigration processes*, *recruitment*, *retention*, and *student well-being*. In many cases, one policy tackled multiple issues and was listed in more than one category. The frequency of each category in total and by policy source, along with our definition of each category, is summarized in Table 1.

Iterative refinement of the data produced a final total of 97 announcements relating to IS across primary and secondary policy sources.⁴ The federal policy updates were predominantly developed by IRCC, which released 37 policy announcements, while GAC published four policy announcements. In Ontario, MCU published five policy announcements, and in Quebec, the

MoE issued 12 policy announcements. For the secondary policy sources, CBIE posted 13 policy announcements, CIGan published 10 announcements, and Universities Canada issued 16 policy announcements. The breakdown of policy announcements by time period is shown in Figure 1.

As the federal agency that regularly interacts with IS by processing immigration requests and monitoring the International Student Program, it was unsurprising that IRCC released the most announcements overall. These tended to fall in our categories of immigration processes and recruitment. At the provincial level, Ontario's MCU also focused on recruitment, whereas Quebec's MoE mainly expressed concerns falling into the Francisation and economic strategy categories. Among the secondary policy sources, CBIE released several announcements related to ethical practices, CIGan's policy announcements emphasized economic strategy, and Universities Canada prioritized recruitment. However, we noticed these concerns shifting over time. Where policy announcements in 2022 tended to discuss IS and Canada's economic growth (falling into our economic strategy category), policy announcements after June of 2023 were more likely to link the immigration processes and recruitment with ethical issues (our ethical practices category). The trend continued in the 2024 policy announcements across all policy sources. We therefore decided to focus on ethical practices, having identified this as an emerging development in policy making.

4 The frequency of the policy in the mapping does not necessarily reflect its importance. For example, one policy change from IRCC would sometimes be delivered in three different announcements: a media advisory, then a news release, and then the Minister's speech memo. Additionally, secondary policy sources mainly addressed or advocated for federal-level policy changes/updates in their announcements.

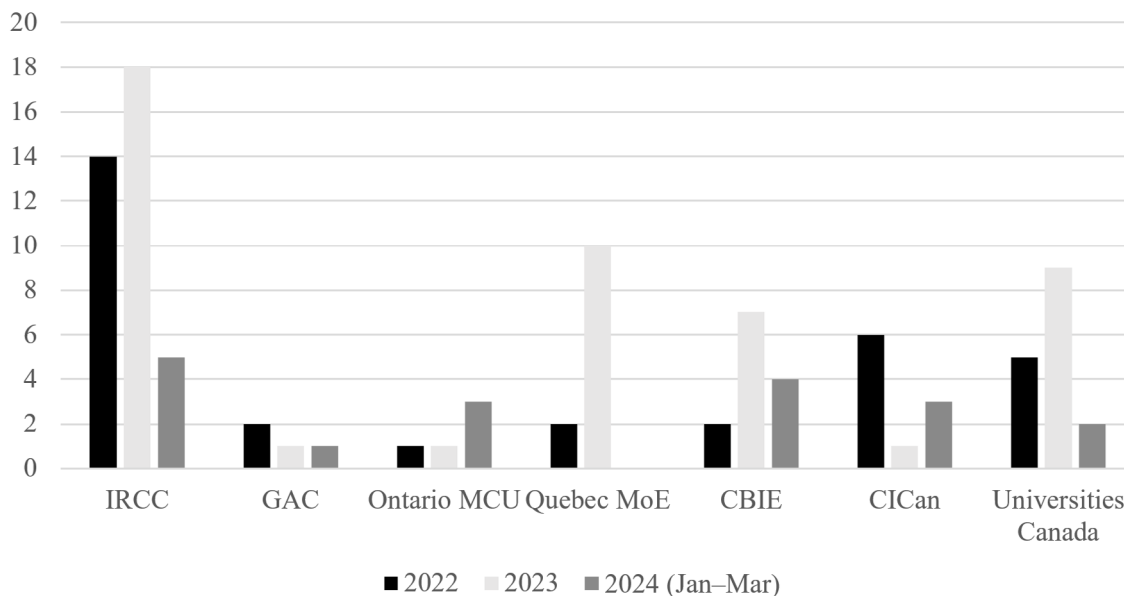
Table 1*Policy Announcements by Category and Frequency*

Category	Number of announcements	Frequency of announcements by source	Description
Economic strategy	43	IRCC (15) GAC (2) Ontario MCU (2) Quebec MoE (7) CBIE (5) CICan (8) Universities Canada (4)	How Canada or provinces can address labour shortages and economic development by recruiting international students for specific sectors and providing opportunities for them to work during/after their studies.
Ethical practices	25	IRCC (10) Ontario MCU (2) CBIE (8) CICan (2) Universities Canada (3)	Fraudulent activities/exploitation in international student recruitment, higher education accessibility, and equity/social justice issues.
Financing	20	IRCC (1) GAC (3) Ontario MCU (2) Quebec MoE (2) CBIE (2) CICan (4) Universities Canada (6)	Financing of higher education that pertains to international students and funding for international students (e.g., scholarships).
Francisation	8	Quebec MoE (8)	Policies and programs in Quebec to achieve the government's goal of expanding the use of French language.
Global commitment	37	IRCC (16) GAC (4) Ontario MCU (2) CBIE (5) CICan (3) Universities Canada (7)	The humanitarian, geopolitical, and development imperatives that relate to international students and are incentivized by Canada's perception of its role in the world.

Category	Number of announcements	Frequency of announcements by source	Description
Immigration processes	55	IRCC (33) GAC (2) Ontario MCU (2) Quebec MoE (5) CBIE (6) CICan (2) Universities Canada (5)	The technical aspects of immigration processes for international students before, during, and after their studies. For example, the introduction of digital systems in the application process.
Recruitment	48	IRCC (9) GAC (2) Ontario MCU (3) Quebec MoE (6) CBIE (11) CICan (7) Universities Canada (10)	Policies and plans that affect international student recruitment including setting out the maximum number that may be in Canada and where they can study (types of institutions and geographic location).
Retention	26	IRCC (10) GAC (1) Ontario MCU (1) Quebec MoE (3) CBIE (2) CICan (5) Universities Canada (4)	Changes in federal/provincial immigration programs related to international students' short-term/long-term employment/settlement in Canada.
Student well-being	30	IRCC (10) GAC (1) Ontario MCU (3) CBIE (6) CICan (5) Universities Canada (5)	Relating to international students' experiences, health care, mental health, housing issues, and financial well-being.

Figure 1

Number of IS Policy Announcements by Source and Time Period



WHAT'S THE PROBLEM REPRESENTED TO BE?

To operationalize the analysis of the policy announcements in the ethical practices category, we used the “What’s the Problem Represented to Be?” (WPR) approach (Bacchi, 2009; Bacchi & Goodwin, 2016), which asks how problems are represented in policies. The WPR approach considers how governmental practices—which can be broadly construed, and which in our study are represented by the policy announcements—produce “problems.” The emphasis is on the production (or problematization) of these “problems” rather than the problem *per se* or the intent behind a particular policy or program (Bacchi & Goodwin, 2016). These “problems” are not always explicit in policies: “most government policies do not officially declare that there is a problem that the policy will address and remedy” (Bacchi, 2009, p. ix). Through six questions and a seventh call to action (see Figure 2), the WPR approach offers a step-by-step heuristic to critically analyze the formation and representation of “problems” in public policy. This approach enables a focus on “how the policy’s responses themselves have a performative effect of constituting problems in particular ways and, by way

of extension, constituting people as subjects” (Matsumoto & Viczko, 2023, p. 1122).

The application of the WPR approach in related studies demonstrates its legitimacy and utility for our study of IS policy making. In the Canadian context, WPR has been used to analyze the mismatch between graduates’ skills and the needs of the labour market (Viczko et al., 2019), Ontario’s universities’ responses to federal government initiatives on crises in Syria, Afghanistan, and Ukraine (Viczko & Matsumoto, 2022), how students are constituted as policy subjects in policy responses to the COVID-19 pandemic, and the displacement of Ukrainian nationals due to war (Matsumoto & Viczko, 2023). International studies have applied WPR to critique policy discourses on IS mobility in the United Kingdom (Lomer, 2017), to examine the internationalization of Chinese higher education (Zhou et al., 2022), and to assess progress on South Africa’s free higher education policy (Masutha & Motala, 2023). The critical lens that WPR facilitated in these studies was similarly useful to our analysis of the finding that the category of ethical practices has become an important theme in shaping IS policy in Canada.

Figure 2

The “What’s the Problem Represented to Be?” (WPR) Approach to Policy Analysis

Question 1: What’s the problem (e.g., of “gender inequality”, “drug use/abuse”, “economic development”, “global warming”, “childhood obesity”, “irregular migration”, etc.) represented to be in a specific policy or policies?

Question 2: What deep-seated presuppositions or assumptions underlie this representation of the “problem” (problem representation)?

Question 3: How has this representation of the “problem” come about?

Question 4: What is left unproblematic in this problem representation? Where are the silences? Can the “problem” be conceptualized differently?

Question 5: What effects (discursive, subjectification, lived) are produced by this representation of the “problem”?

Question 6: How and where has this representation of the “problem” been produced, disseminated and defended? How has it been and/or how can it be disrupted and replaced?

Step 7: Apply this list of questions to your own problem representations.

(Bacchi & Goodwin, 2016, p. 20)

ETHICAL PRACTICES AS AN EMERGING POLICY PROBLEM

We identified 25 announcements expressing concerns about ethical practices relating to fraud in IS immigration (from recruitment agents, IS, and other actors), exploitation (of the immigration system and of IS), the accessibility of higher education, and questions of social justice and equity in other countries. In this article, we focus on the problematization of activities relating to integrity and fraud. In the WPR framework, there is utility in understanding problems chronologically to map how events unfold over time, which was helpful for our study because the 2022–2024 period was marked by rapid change and policy reform. Thus, following a narrative presentation of a timeline of events (which also partially responds to WPR’s third question), this section is organized in response to the questions in the WPR framework. Although it is not essential to answer all six questions (Bacchi & Goodwin, 2016), we found them all relevant to our inquiry.

Timeline of Events

Our first understanding of what constitutes fraudulent behaviours came on June 7, 2022, with IRCC and the Quebec government emphasizing the need to protect the integrity of immigration processes (IRCC, 2022). Critiquing the misuse of the International Student Program/post-study immigration by some IS in private HEIs and highlighting the threat to Francisation initiatives, the federal and Quebec provincial governments jointly announced stricter requirements on immigration pathways in Quebec. By the following year, the focus on integrity had been complemented with concerns around fraud. On June 14, 2023, then-federal Minister of Immigration Sean Fraser called out “unscrupulous actors” (e.g., nefarious consultants, or IS who knowingly participated in fraudulent activities) who gave out fraudulent acceptance letters to HEIs, as well as dishonest immigration agents targeting students wanting to study in Canada (IRCC, 2023a). While condemning these bad actors, Fraser also critiqued IS who willingly “used fraudulent acceptance letters to take advantage of Canada’s immigration system” (IRCC, 2023a, para. 2), noting links to organized crime. The an-

nouncement hinted at future actions to support the integrity of IS immigration.

The federal government's announcement followed an April 2023 consultation brief on immigration by the Canadian Bureau for International Education (CBIE, 2023a), which, among suggestions for creating a more efficient immigration system, called for improvements to the wider ecosystem of immigration and the creation of better pathways from student status to worker and permanent resident. In addition, CBIE advocated for creating a code of ethical practice, revisited in the July 2023 publication of a later consultation brief on the proposed International Education Strategy for 2024–2029 (CBIE, 2023b) that envisions the next strategy being ethical to ultimately protect Canada's global brand.

On October 26, 2023, the new federal Minister of Immigration Marc Miller revealed his intention to strengthen the International Student Program and “protect genuine students from fraud” (IRCC, 2023b, para. 1). The official announcement the following day introduced new measures, including that IS acceptance letters would be confirmed at the provincial level, the reassessment of the post-graduation work permit (a specified open work permit only for IS), and a new “recognized institutions” designation under which select HEIs would benefit from priority processing of study permit applications (IRCC, 2023c). Miller indicated that further changes would follow.

Following this precursor, IRCC announced an unprecedented enrolment cap on IS numbers coming into Canada on January 22, 2024 (IRCC, 2024a), with the stated aim to decrease student numbers as a necessary action for the sustainability of immigration. On the same day, CBIE responded with a statement acknowledging that international education policies “need to be recalibrated and that bad behaviour on the part of a minority of actors needs to be penalized” (CBIE, 2024b, para. 1), agreeing that untrammelled and “in some cases, unethical” (para. 1) growth in IS numbers had to be addressed. Relatedly, on January 26, 2024, Minister of Colleges and Universities Jill Dunlop of Ontario's MCU called out “the challenges stemming from the recent spike

in students coming to Canada, including predatory practices by bad-actor recruiters, misinformation regarding citizenship and permanent residency, false promises of guaranteed employment, and inadequate housing for students” (MCU, 2024, para. 1).

The major federal announcement prompted a joint response from Universities Canada and CICan on January 30, 2024, that focused on the impact of study permit processing delays and damage to Canada's role as a top study destination (Universities Canada & CICan, 2024). It does not mention fraud but does refer to “program integrity.” On March 1, 2024, CBIE announced a national policy dialogue that would focus on “ethical and sustainable international education in Canada” (CBIE, 2024c, para. 3), a clear response to what it saw as the “fluid and uncertain policy environment” (para. 1).

Whether by chance or design, March is designated fraud prevention month by the federal government. As a result, on the same day as the CBIE announcement, Minister Miller also released a statement “to highlight the risks of immigration-related fraud” (IRCC, 2024b, para. 2), which cited IRCC's work to inform future IS about fraud so “they can recognize scams and protect themselves” (para. 3). This announcement records that “we are also taking action against nefarious actors who have preyed on genuine students for financial gain” (para. 3). The final event within our data collection timeframe was another announcement by Minister Miller. On March 21, 2024, he announced that the government would become more strategic about the number of IS and other temporary workers admitted, recalling again “exponential growth” in IS caused by “the chronic underfunding of post-secondary education and unscrupulous actors looking to profit off of vulnerable individuals” (IRCC, 2024c, para. 14). The narrative painted by Miller combines the recurring theme of the economic rationale for IS recruitment with the emerging challenge of ethical practices.

Having provided the context through this chronological understanding of how this particular policy problem has unfolded, we turn to the questions used in the WPR approach.

Question 1: What's the "Problem" Represented to be in a Specific Policy or Policy Proposal?

In the ethical practices category, fraudulent activity is flagged as a major problem, particularly by the IRCC. While the IRCC frames this as the result of "unscrupulous actors" and cites the need to curb immigration to meet market demands, secondary policy bodies highlight the importance of developing ethical practices, including a code of conduct, to support, rather than punish, students. In Quebec, the government represents the problem as wanting to boost the integrity of immigration, effectively protecting the province from immigration misuse. In general, nefarious actors are centred as the problem. These actors include recruitment agents falsely promising an immigration backdoor into Canada through the International Student Program, the IS who seek out these immigration routes, and those operating in concert with organized crime. With their focus on supporting students, CBIE and C/Can also emphasize potential reputational damage to Canada as an important problem.

Question 2: What Presuppositions or Assumptions Underpin This Representation of the "Problem"?

Fraud is largely framed as dishonest behaviours within IS recruitment and immigration. This includes the fraudulent activities of "unscrupulous actors" who are primarily characterized as recruitment agents who recruit students for HEIs at a profit. Dishonest behaviour is also assumed to be performed by IS themselves, who are perceived as taking advantage of the Canadian immigration system for subsequent work. A major policy change put forth in January of 2024 by IRCC assumes that capping IS enrolment will address their representation of the problem. The perception of fraudulent activities has been interpreted differently by Ontario's MCU and secondary policy bodies, who focus on other issues inherent in Canada's International Student Program and argue that the cap will be harmful to international education. Higher education institutions are positioned differently by primary and

secondary policy sources: IRCC and Ontario's MCU view HEIs as stakeholders who must follow government guidelines, whereas secondary policy sources advocate for HEIs to unite as sectors and to build communication with government agencies regarding ethical practices.

Question 3: How Has This Representation of the "Problem" Come About?

This question encourages unpacking the historical context of the problem, but also how the problem unfolded as seen through the above chronological timeline of events. Canada's aggressive internationalization strategy led to a boom in IS with nearly 200% growth in the past decade (CBIE, 2024a). However, a largely unregulated strategy has left pathways for fraudulent actors and contributed to precarity for students, including limited housing. More context for how the problems are represented and how they have unfolded across time can be seen in the timeline. The timeline also reveals a number of warning signs of international education policy reform and restrictions subsequently followed by calls and responses as federal agencies make dramatic policy changes and other bodies respond to the implications.

Question 4: What Is Left Unproblematic in This Problem Representation? Where Are the Silences? Can the "Problem" be Thought About Differently?

By and large, federal responses blame unscrupulous actors for the problems in the International Student Program. A silence in this representation is the absence of systemic self-examination, with no formal acknowledgement of the role the government has had in perpetuating this issue, such as limited ethical oversight. Yet the now-defunct International Education Strategy created the conditions for dramatic growth in student numbers, with a focus on profit and, in some cases, meeting market needs for workers. Rhetoric around the impact on IS is a more

recent development and remains muted in the problem representation from the federal perspective, whereas secondary policy bodies and provincial governments were more inclined to focus on IS well-being. However, there was no discussion around the equity implications for IS; for example, seeking to address the racism underpinning high study permit rejection rates for students from African countries is a clear omission (Waruru, 2023).

Question 5: What Effects Are Produced by This Representation of the “Problem”?

Secondary policy bodies expressed concerns that the focus on recruitment, enrolment, and more complicated immigration pathways could damage the Canadian brand. They also want to see clearer guidelines for ethical practices. Though IRCC has said that policy changes will ensure that new regulations create better circumstances for students, understanding how these policies will impact future IS and those already settled in Canada was not clear from the announcements. With evidence of increasing public hostility toward IS (Harden-Wolfson et al., 2024), it is important to consider whether the government’s messaging has the potential to contribute to an anti-IS sentiment. Furthermore, if the government continues to blame nefarious actors but does not have a comprehensive audit of how processes within the International Student Program may contribute to unethical practices, ethical concerns are likely to persist in spite of new policies.

Question 6: How and Where Has This Representation of the “Problem” Been Produced, Disseminated, and Defended?

The timeline of events demonstrates a pattern of calls and responses between all the policy bodies we studied. For example, the secondary policy bodies used “IRCC/federal announcement,” “student/study permits,” or “(international student) caps” as the keywords in their announce-

ment headlines after IRCC hinted or released policy changes in IS recruitment. Secondary policy bodies appear to represent international education stakeholders on the ground and, to amplify their message, two (Universities Canada and CICan) chose to present a united front to respond to policy changes. Most policy bodies agree on the need for sustainability; however, this sustainability has different interpretations and motivations. The Quebec government is clear about linking immigration to language competency and meeting its goals around promoting the French language. The IRCC is firm that an IS enrolment cap is the answer to a strained international education and immigration system and that further regulation, including acceptance letter verification, is the solution. Secondary policy bodies, particularly CBIE, have been clear about asking for student support and clear ethical guidelines.

WHO’S TO BLAME FOR (UN)ETHICAL PRACTICES?

Over the last two years, the Canadian IS policy landscape has dramatically shifted at the federal and provincial levels. The pre-pandemic policy strategy was largely driven by recruiting IS, improving overall student numbers, and bolstering the Canadian economy. However, approaching the end of 2023, this strategy shifted as policy announcements connected IS recruitment with broader issues in Canadian society, including immigration, housing, and labour market shortages. The IS policy landscape has tightened in the post-pandemic era, subsequently focusing on controlling and regulating international education. This change occurred in tandem with increased discussions of ethical practices in IS policy announcements. A key takeaway is that while ethical practices is an increasingly important policy domain, the timeline of events from the last two years alone revealed a number of precursors, warning signs, and “wish lists” that demonstrate how this policy problem has evolved and not simply appeared. This aligns with previous research showing how concerns about fraudulent applications to study in Cana-

da and bogus HEIs have been moving onto the policy radar since the 2010s (Brunner, 2023).

Our analysis strategically focused on the ethical practices category as it appeared as an escalating policy concern during the data collection timeframe. Some of the announcements apportioned blame to HEIs for unethical practices, which in turn was seen to negatively influence IS experiences and was also associated with the social issues in Canada. Higher education institutions were seen to passively participate in fraudulent activities, with some announcements requiring them to take more active roles in mitigating the negative consequences of their (in)action. However, most of the attention in the announcements focused on IS themselves, representing them in ways that extend—but do not replace—the previous dominance of economic arguments.

Within the shifting policy landscape, IS are overwhelmingly constructed as passive agents in policy announcements. This passivity indicates that IS are those to whom policies happen, versus being active agents involved in the co-construction of policy narratives. For the most part, they are seen as victims who have been taken advantage of by fraudulent recruitment agents who generate sham acceptance letters and make false promises about post-study immigration. When, at times, IS are portrayed more actively, this most often occurs when students are identified as wrong-doers. For example, it is implied that would-be IS initiate or are involved in the fraudulent recruitment activities, are opportunistic in wishing to exploit the Canadian higher education and immigration system, and may even have links to organized crime. And, in announcing the enrolment cap in January of 2024, the federal government connected growing IS numbers and broader socio-economic issues, stating that this “puts pressure on housing, health care and other services” (IRCC, 2024a, para. 1). This appears to blame IS for problems that are not of their own making, emboldening the greater public to do the same.

CONCLUSION

This study examined the changing Canadian policy landscape toward IS by mapping policy announcements made by federal and provincial government agencies and secondary policy sources with a major stake in (international) higher education in Canada. Through our analysis, we created nine categories into which the announcements could be classified, indicating the dynamism of IS policy in the post-pandemic period. Generating these categories is a novel approach for understanding these policies within a larger WPR framework, as well as the central themes driving these policies. We focused on the ethical practices category as it has become a major vehicle through which policy bodies are constructing the role of IS in Canada. However, we also showed how this “problem” has developed since 2022—it did not manifest out of nowhere.

The WPR approach enabled a critical analysis of how policy agencies identify and view issues relating to ethical practices. By presenting a timeline of events and reviewing policy announcements using the WPR framework, we demonstrated differing representations of the “problem” of ethical practices as well as the call and response nature of announcements among primary and secondary policy sources. Notably, this focus showed how links between IS and national issues, such as housing shortages and labour market needs, have been created. In turn, this showed how responsibility for these issues has been assigned both to unscrupulous actors and IS themselves.

While data collection for this study ended in March of 2024, wind continues to fill the sails of IS policy change; in particular in Quebec, where the focus on ethical practices is layered with Francisation demands (Cabinet du premier ministre & Cabinet de la ministre de l’Immigration, de la Francisation et de l’Intégration, 2024; IRCC, 2024d). And Canada is not alone in changing tack in its IS policy. At the time of writing this article (mid-to-late 2024), recent directives from direct competitors Australia and the United Kingdom indicated similar patterns of greater regulation of international education, whether by tightening

student visa rules (“Australia plans to,” 2023) or by restricting students’ ability to travel with their dependents (Ouaguira, 2024).

Given the ongoing nature of these changes, it would be valuable for future studies to continue mapping policies toward IS, both in Canadian jurisdictions as well as in international and comparative contexts. Furthermore, while this article focused on the category of ethical practices, more attention is needed on other emerging policy domains. We suggest that the categories of Francisation and Canada’s global commitments would be of particular interest for future study given their political salience. The focus of this study on policy announcements could be addressed by research with IS and/or student advocacy groups, aiming to understand the relationships between policies and lived experiences, such as the implications of fraud prevention policies on students’ academic and living conditions.

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