

Canada's proposed Trusted Institution framework: Implications for Designated Learning Institutions

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Canada is planning to introduce a new Trusted Institution framework for its student visa programme by 2024, which will create a two-tiered structure among Designated Learning Institutions (DLIs). The proposed framework forms part of a larger strategy to modernize the International Student Program (ISP) and address various concerns, such as the vulnerability of international students, the high volume of applications, and the need for more diversity.

The Trusted Institution framework could have significant impacts for DLIs, depending on their type, size, location, and reputation. It is expected that the framework will impose more stringent and costly requirements on for-profit educational institutions than on not-for profit educational institutions, which generally face more scrutiny and regulation than the former. For-profit educational institutions may also be required to invest more resources to hire qualified staff, improve curriculum, ensure financial sustainability, and provide accurate and transparent information to international students. They may also be subject to more frequent and rigorous audits and inspections by both federal and provincial/territorial regulators, as well as more severe consequences for violating the code of practice and conduct for DLIs and education agents.

The Trusted Institution framework will assess DLIs based on specific criteria that demonstrates their reliability in areas such as sustainable intake, identification of genuine students, compliance monitoring and reporting, and ensuring a safe and enriching experience for international students. The framework will rely on two types of data: (i) IRCC's own data sources; and (ii) additional data shared by DLIs themselves. DLIs that meet the criteria will be designated as Trusted Institutions and will benefit from streamlined and expedited processing for prospective students. Immigration, Refugees and Citizenship Canada (IRCC) initiated a pilot data gathering project in August 2023, involving a limited number of Canadian institutions, and is expected to make the survey available to all DLIs later this Fall. The initial list of Trusted Institutions to be released by Spring 2024.

Engaging with agents and online agent services

The Trusted Institution framework is likely to impact how DLIs will engage with agents and/or online agent services in a number of ways. First, DLIs are required to demonstrate how they support the needs and interests of international students, which could include providing detailed plans on how they work with agents and ensure they provide accurate information to prospective students. DLIs will also have to comply with a code of practice and conduct, which may entail regular audits of agents and/or online agent platforms, as well as penalties for violations. DLIs may also be required to communicate directly with international students to inform them of their immigration prospects, such as their program's eligibility for a post-graduation work permit (PGWP), reducing the reliance on agents and online services as intermediaries, allowing international students to make better informed decisions. DLIs may be required to report their agent information to a centralized portal, as is done in Australia, which would allow stakeholders to access data on agent performance and immigration outcomes.

Impact on public-private partnerships

The Trusted Institution framework may have significant implications for the public-private partnership regime that has grown tremendously in Canada over the past ten years. This regime involves public colleges and universities entering into partnerships with private for-profit institutions, which recruit and educate international students under the name of and using the public institutions' program and with the public institutions granting them their educational credential. Several challenges and risks have been associated with the public-private regime as it relates to the ISP, including quality assurance, compliance, oversight, and even fraud. Depending on the criteria established for the Trusted Institution framework, it is possible that provincial and territorial regulators may consider only allowing Trusted Institutions to enter into agreements with public colleges and universities once the framework is in place, potentially limiting the number and scope of public-private partnerships. Alternatively, provincial and territorial regulators may require both partners in such agreements to meet the Trusted Institution requirements, potentially raising the bar for quality and integrity across the sector.

Key takeaways

With Canada on track to host approximately 900,000 international students this year, demand for international education is expected to grow in Canada. Recognizing that international students are a major source of revenue for post-secondary institutions and labour market outcomes for the Canadian economy more generally, any changes to the ISP should balance the need for financial sustainability, competitiveness, and diversity with the need for program integrity, student protection, and public confidence.

In light of these developments, DLIs need to be aware of the following key takeaways:

The infographic consists of five numbered callout boxes overlaid on a background image of a hand holding a laptop. The boxes are: 01 (light blue), 02 (green), 03 (teal), 04 (light blue), and 05 (purple).

- 01**

The Trusted Institution designation will become a competitive advantage for institutions wanting to attract and retain international students, as it will offer faster visa processing and provide a sense of quality and reliability to prospective students.
- 02**

The criteria for the Trusted Institution designation have not been fully defined, but they will likely include metrics such as retention rates, on-time program completion, percentage of revenue from international tuition, scholarships awarded to international students from less developed countries, funding for international student supports, availability of DLI-administered housing, and teacher-student ratio, among other things.
- 03**

DLIs will be required to report key data to IRCC to be accredited as a Trusted Institution, which may require additional resources and systems to collect and analyze relevant data.
- 04**

DLIs that do not meet the criteria for the Trusted Institution designation will not lose their status as DLIs; rather, they will be subject to existing visa processing times and may lose some of their appeal to international students.
- 05**

DLIs should monitor the developments of the Trusted Institution framework and the potential cap on international student arrivals and engage with IRCC and other stakeholders to provide feedback and input on the implementation and impact of these measures.

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