



The Role of Education Agents in Canada's Education Systems

December 2013



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Council of
Ministers
of Education,
Canada

Conseil des
ministres
de l'Éducation
(Canada)

Acknowledgements

This report was written by Robert Coffey and Leanne M. Perry of Michigan State University, under contract to the Council of Ministers of Education, Canada (CMEC). The authors would like to thank Monica Kronfli at CMEC for her unflagging guidance and support. We would also like to thank the many educational administrators and government officials who participated in the survey and interview phases of the study. The information they provided was invaluable to us, and we hope that, in turn, this report is of use to them in their work. Lastly, we would like to thank Dr. Ann Austin of Michigan State University for her assistance in developing the survey instrument and navigating the institutional review process.

The opinions expressed herein are those of the authors and not necessarily those of CMEC.

All errors and/or omissions are those of the authors.

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Executive Summary

- Agent use is common across Canada's international education systems (which are defined here to mean Canada's public and private elementary, secondary, and postsecondary educational institutions over which the provinces and territories have jurisdiction). Use is concentrated in the postsecondary system and in jurisdictions that are top destinations for international students (Appendix A illustrates agent use by jurisdiction).
- A notable exception is Quebec: administrators surveyed for this report reported minimal use of agents. Participants there described a very different recruitment environment and noted that they were unable to tap into the global demand for English-language instruction. Instead, some institutions promote "solidarity" or cultural exchange with other countries in *la Francophonie* and arrange scholarships for many international students. This philosophy is reminiscent of an earlier era in Canadian internationalization, when the emphasis was on educational opportunity as aid, not trade.
- The multi-jurisdictional nature of the agent phenomenon, coupled with the competitive recruitment environment, has slowed efforts to develop regulatory frameworks in many destination countries. Not surprisingly, most efforts have involved persuading agents and jurisdictions to voluntarily comply with codes of practice and conduct. While concerns about immigration-agent misconduct initially preoccupied Canadian policy-makers, attention has pivoted to international student recruitment. Proposed new regulations at the federal and provincial/territorial levels would require educational institutions to obtain government approval in order to recruit and enrol international students. Manitoba is the first jurisdiction in Canada to have introduced regulations requiring institutions to make public which agents represent them and obliging agents to abide by a code of conduct and practice.
- Most interview participants outside Quebec described agents as indispensable partners in recruitment activities. They illustrated an intensely competitive recruitment environment and suggested that agents were necessary to expanding their reach and helping them achieve a scale that would be unattainable otherwise. Institutions often use agents to compensate for the lack of name recognition overseas that might otherwise have drawn students to them.
- Agent recruitment and management practices vary significantly within Canada's education systems. In most provinces and territories, educational institutions that employ agents are responsible for their oversight. Many make use of best practices and codes of conduct developed by educational organizations like the British Council and the Canadian Bureau for International Education (CBIE). Some institutions have developed robust agent-management protocols, including ongoing training opportunities and provisions for purging unproductive or non-compliant agents. Others do minimal screening and rely on complaints from students and parents or information from colleagues at other institutions. This range is interesting, given that a majority of survey respondents reported feeling confident that their agents provided accurate information. It may be that for some administrators, "no news is good news" — implying that a lack of complaints means that agents are performing well.

- While most interview participants said they would terminate an agent's contract if misconduct occurred, not all felt that this option was available to them. Institutions whose enrolment depends on students referred by agents may be reluctant to confront agent misconduct for fear of having them refer students elsewhere. Even for institutions with a "no tolerance" standard, providing effective oversight poses a logistical challenge and may make it harder to be aware of incidents of agent misconduct. Language barriers and the possibility that agents have contracted out to sub-agents further complicate monitoring agent conduct.
- Students and their parents use agents to help them choose a country, institution, credential, and course of study from a range of mostly unfamiliar options. This helps explain why an institution's reputation is a critical factor, why "super-league" institutions do not use agents, and why less-well-known institutions rely on them to help build brand awareness. Agents and students connect in a variety of ways — through education fairs, recommendations from family and friends, and in response to marketing and social media.
- Agent fees may reflect a local or regional "industry standard" or may vary based on the market in which the agent is located. In some markets, institutions bear the full cost of an agent's services, and this generally represents a proportion of the incoming student's tuition. In other markets, students pay a fee, and these fees may be double what the institution is charged by the agent. A few institutions included in our survey forbid their agents to charge students.
- One hundred and forty-five respondents completed a survey that was distributed in both French and English. Most respondents from the education sector — about 78 per cent — reported that their institution used agents. The top countries in which agents are working to recruit students to Canadian institutions are as follows (in descending order): China, South Korea, Japan, Mexico, Saudi Arabia, Hong Kong, India, France, Brazil, Pakistan, Nigeria, the United Kingdom, and Russia.
- Interviews with 12 education officials and government administrators provided additional means for data collection and offered richer detail than could be obtained through the survey alone.

Introduction

Canada has become a top destination for international students, drawn here by its quality of life, safe and vibrant communities, and world-class educational opportunities. In turn, international students make important contributions to their host communities. They serve as bridge builders between home and host countries, enrich the classroom-learning environment, generate significant revenue (\$6.9 billion to the Canadian economy in 2010) (Advisory Panel on Canada's International Education Strategy, 2012), and — if they choose to stay — can move into the skilled workforce with recognized educational credentials and established personal and professional networks (Kunin & Associates, 2012). Not surprisingly, the recruitment environment for international students has become intensely competitive, with educational institutions and destination countries vying to increase their share of this global flow of students. For all but the best-known and most elite institutions, successful recruitment involves marketing the institution's country to prospective students, providing information about course options and entrance requirements, and helping students navigate complex visa and application processes.

Education agents ("agents") have emerged as intermediaries in this process, and their use has become commonplace in Canada. Agents and agencies provide advice, counsel, and placement assistance to prospective students and their families. They are paid for their services by the educational institutions they represent, the students they assist, or both. When working on commission for an educational institution, agents generally receive a percentage of the matriculated student's tuition after a particular benchmark is reached (e.g., successful completion of the first semester of study). Agents working for students charge a fee for their assistance, often based on the number of applications with which they assist. Although institutions at every level of Canada's education systems employ agents, their use is particularly concentrated in the postsecondary sector.

Although the use of agents is standard practice in the United Kingdom and Australia, their involvement in North America is more recent and controversial. Proponents describe agents as cost-effective and trusted partners in a hyper-competitive recruitment environment. Detractors (particularly in the US, where domestic, commission-based postsecondary recruitment is illegal) argue that lack of transparency in agent work may lead to profit seeking trumping student welfare. Agents may collude with students and parents to submit falsified application materials. For example, a 2010 report estimated that 70 per cent of Chinese applicants to overseas institutions had submitted personal essays written by someone else, while 90 per cent had submitted false letters of recommendation (Wilhelm, 2010). Further, institutional brands can be damaged by unethical agent behaviour. As one US admissions official interviewed for a 2010 news article explained, "We still have...reservations about whether we need to [use agents] and whether that would result in students who really should be coming to [our institution] as opposed to being cajoled into it...There are concerns that bad agents would not understand [us], and would misrepresent what we are, and therefore it could tarnish the university name" (Redden, 2010).

While anecdotal incidents of bad agent behaviour overseas have received widespread attention, little is known about the role of agents in Canada's education systems, and this has made it difficult to assess both the positive and adverse impacts of agent involvement on Canadian educational institutions and their students. A lack of data has thus far not precluded Canadian governments from taking action to address the potential for agent misbehaviour. Legislation introduced at the federal and provincial/territorial levels would create new legal obligations for both educational institutions and education agents with respect to the welfare of students. The federal government has also introduced a voluntary on-line training course on Canada's education systems for agents. These initiatives dovetail with efforts outside Canada to develop both compulsory and voluntary regulatory and policy guidelines governing agent work.

Purpose

The main purpose of this report is to provide an environmental scan of agent use in Canada's education systems. Specifically discussed are: the scope of agent involvement within and across education sectors; the nature of agent transactions with key stakeholders (e.g., students, parents, and institutions); current regulatory frameworks in Canada and abroad regarding agent use; and the benefits and risks of agent involvement. This report draws upon a review and analysis of scholarly literature; government, industry, and policy-centre reports and policies; media coverage (industry, education, and news) of agent use; and the results of a Canada-wide survey of administrators with responsibilities for international student recruitment at all levels of the education system. Interviews with a subset of survey respondents provided additional context for deeper understanding of the role that agents play.

The report begins with a review of the results of our survey on agent use by Canadian education institutions. Regulatory frameworks for agent use in Canada and three top destination countries are also briefly reviewed. There follows a description of how, why, and which institutions use agents and a discussion of how institutions screen, hire, make contracts with, and remunerate them. Agent misconduct and institutional response strategies are also discussed. Drawing on scholarly literature, the motivations for students and their families to hire an agent — including how agents and students connect and what services agents provide, as well as agent fees to students — are explored.

Context and Definition of Terms

Canada's elementary, secondary, and postsecondary educational institutions are referred to as "Canada's education systems." The plural "systems" is especially apt, as there is no federal ministry of education or unitary, centralized education system in Canada (Council of Ministers of Education, Canada, 2008; Jones, 1998). Rather, within the Canadian Confederation, the provision of education is a provincial and territorial responsibility. "[S]ignificant differences in curriculum, assessment, and accountability policies" from jurisdiction to jurisdiction "express the geography, history, language, culture, and corresponding specialized needs of the populations served" (CMEC, 2008). Provincial and territorial governments generally delegate operational and administrative responsibility for elementary and secondary educational institutions within a particular catchment area to school boards [sometimes called school districts, school divisions, or district education councils (CMEC, 2008)]. Postsecondary institutions also fall within the remit of provincial and territorial governments, although they operate with significant autonomy (Jones, 1998). Private institutions exist at all education levels. Funding and oversight of private institutions vary by jurisdiction and level (CMEC, 2008). The federal role in education provision primarily takes the form of indirect funding through fiscal transfers to provinces and territories, direct support of research in postsecondary institutions, and student financial assistance for postsecondary students.

The term "education agent" (sometimes referred to as an "education consultant") refers to an individual or organization offering "education advising services to students and their parents in exchange for a fee (paid by students and their families) and/or a commission (paid by an [educational] institution they represent...)" (Coffey, 2013). These individuals or organizations may also act as immigration agents (or immigration consultants). Immigration agents provide advice and assistance to individuals hoping to migrate, in exchange for a fee (paid by the individual) and/or a commission (paid by a prospective employer). While specific agents and agencies may provide both services, for the purposes of this study, the focus is entirely on the role that education agents play.

Data from the Pan-Canadian Survey on Agent Use

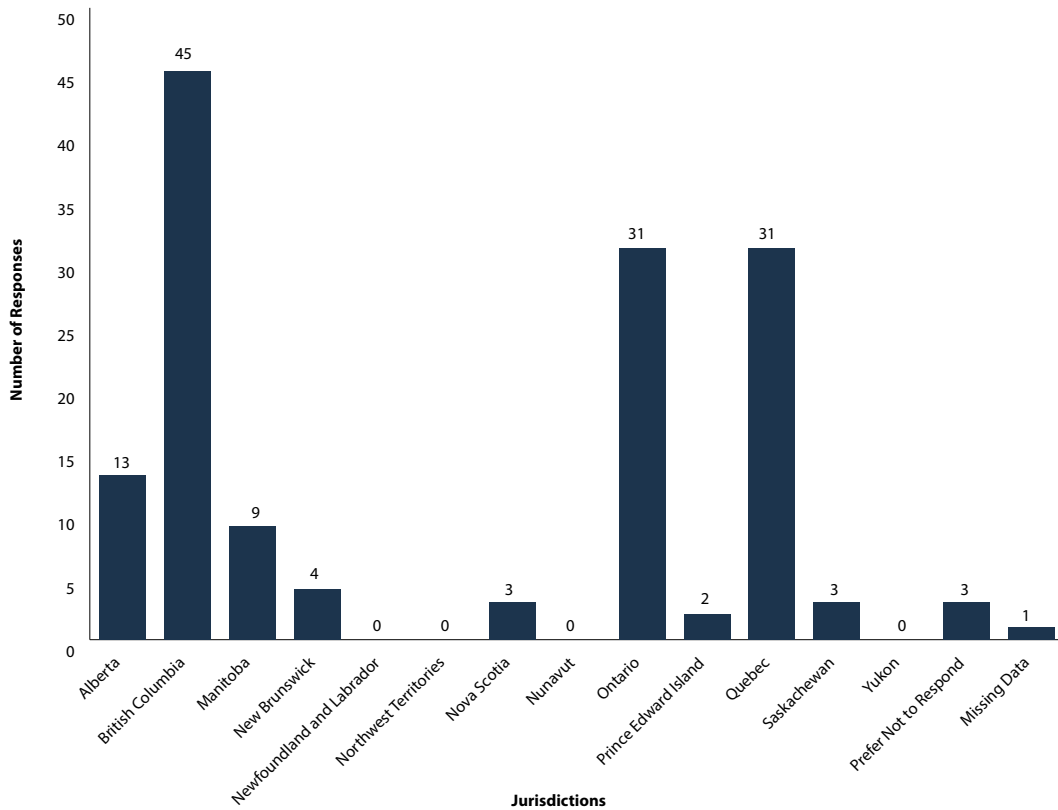
The following section describes findings from a survey on agent use in Canada's education systems. The survey was distributed widely to administrators in educational institutions across the country and to government officials who work in international education. Throughout the section, relevant tables and figures are provided to illustrate patterns of use by education level, type, and jurisdiction, as well as respondent occupation. Readers should note that each finding in this report does not necessarily correspond to the overall response rate of the survey ($n=145$). The survey employed skip logic whereby people working in different sectors answered slightly different questions. As such, low response numbers on questions should not be regarded as missing data. (See Appendix B for the survey instrument and skip-logic pattern.)

An e-mail invitation to participate in the study was sent to a contact list of educational administrators and government policy-makers. This list was compiled with the assistance of government officials participating in a working group struck by CMEC. Additionally, recipients of this e-mail frequently forwarded the invitation to colleagues who also (or better) fit the study criteria. As such, there is no way to know the total number of individuals who received this invitation, and consequently, an overall response rate percentage cannot be calculated.

Demographic data

Figure 1 illustrates the jurisdictions in which the 145 survey respondents work. Responses were received from all jurisdictions except Newfoundland and Labrador, Northwest Territories, Nunavut, and Yukon. About 87 per cent of respondents represented educational institutions, and about 10 per cent were from government agencies. Twelve respondents who represented government agencies work in provincial or territorial government. Other respondents who represented government agencies did not respond to the question. Given the exploratory nature of this study, the report makes use of descriptive rather than inferential statistics. As such, variation in participation rates from one jurisdiction to another did not negatively influence findings.

Figure 1. Survey Respondents’ Jurisdictions (n = 145)



Agent use

Figure 2 illustrates the prevalence of agent use reported by respondents. Most respondents from the education sector — about 78 per cent — reported that their institutions use agents. Of those using agents and who answered the question regarding the type of agents they use, the vast majority (90 per cent) reported that they use both independent agents and agencies. Six respondents said their institution uses agencies exclusively, while no one reported using independent agents exclusively.

Figure 2. Whether or Not Respondents' Organizations Use Agents (n = 125)

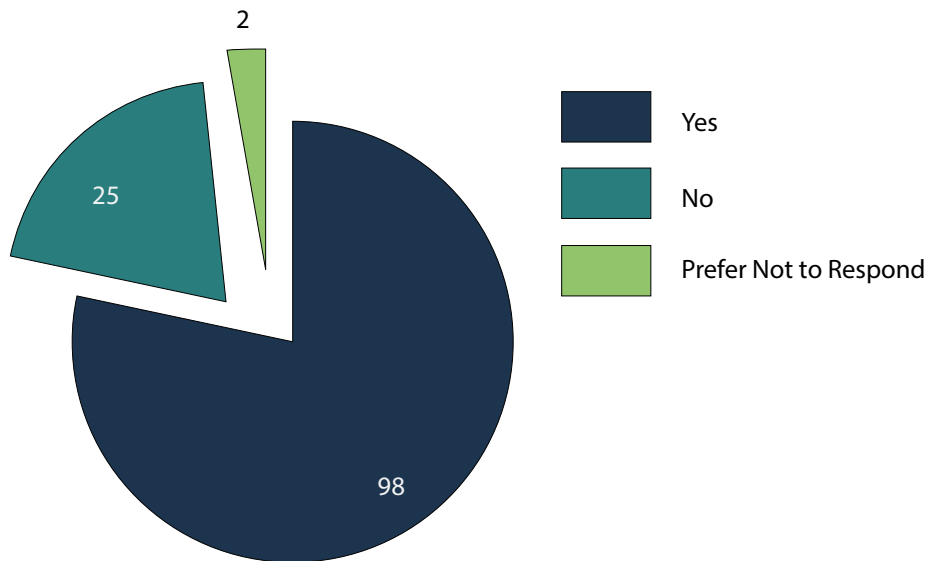
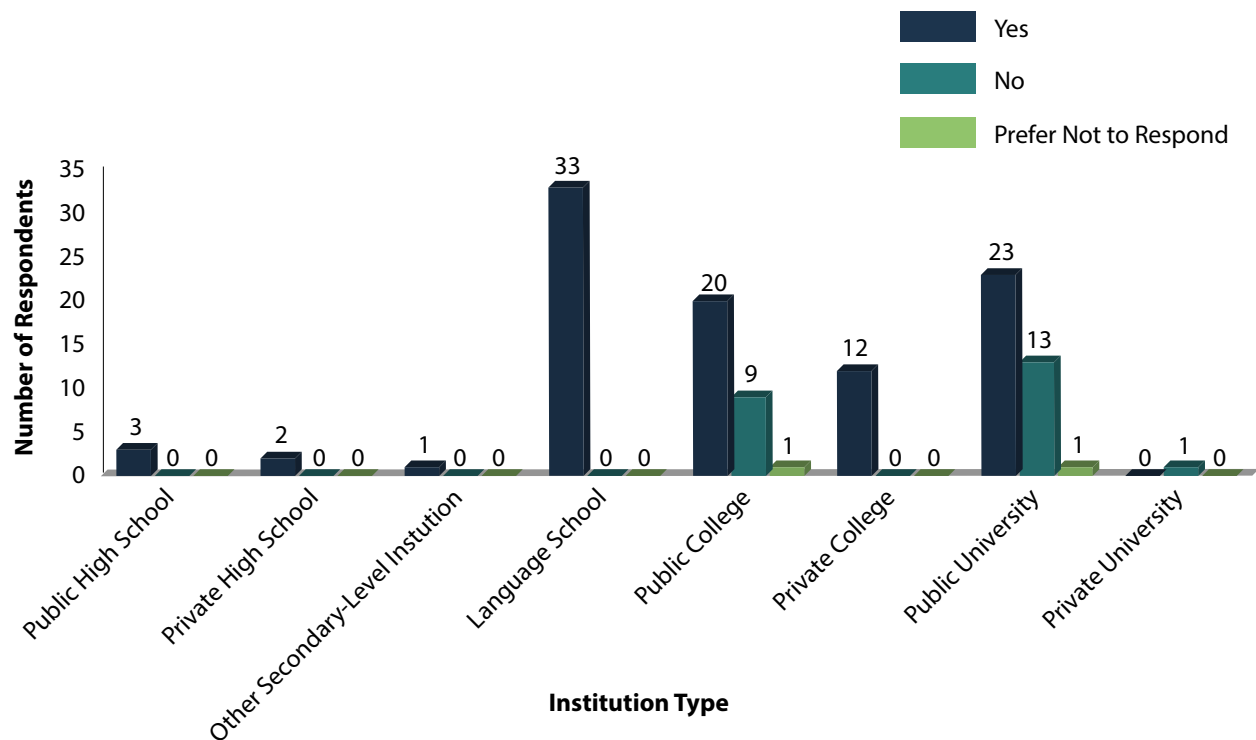


Figure 2a disaggregates the data and represents agent use by institution type. For further information about data by institution type, refer to Appendices D through J, which break down responses for each jurisdiction by institution type. (Please note: Nova Scotia and Prince Edward Island had insufficient data to create tables specific to those jurisdictions.)

Figure 2a. Agent Use by Institution Type (n = 119)

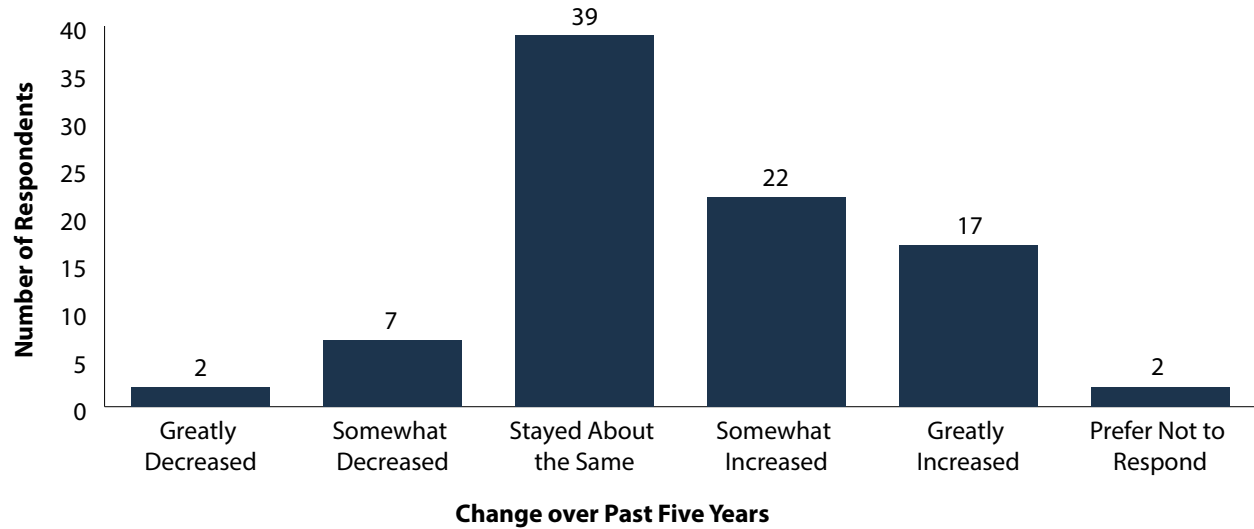


In terms of agents' location, about 96 per cent reported that agents/agencies they use are based both in and outside of Canada. Only one respondent reported using an agent/agency based exclusively outside Canada, and three respondents reported using agents/agencies based exclusively within Canada.

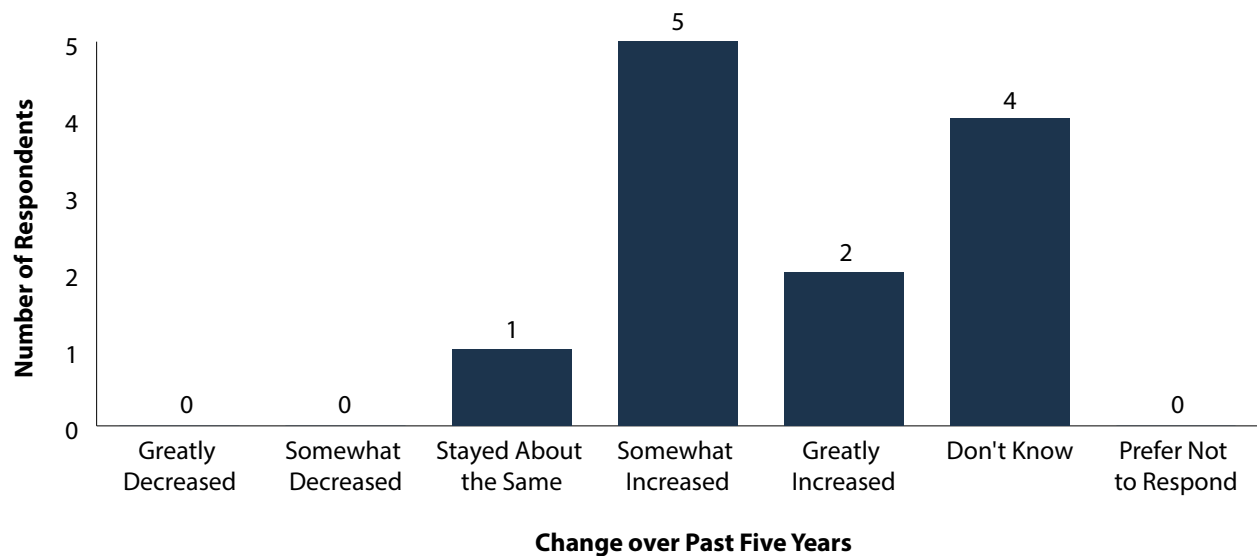
Understanding of agent activity

As Figures 3 and 4 illustrate, most respondents reported that agent use has either remained about the same or has increased over the past five years. Among respondents from the education sector (Figure 3), four in 10 said that the use of agents for recruitment has somewhat or greatly increased at their institution in the past five years. Another four in 10 said that it has remained largely the same at their institution.

Figure 3. Change in Agent Use over Past Five Years in Education Sector (n = 89)



**Figure 4. Change in Agent Use over Past Five Years in Government Sector
(n = 12)**

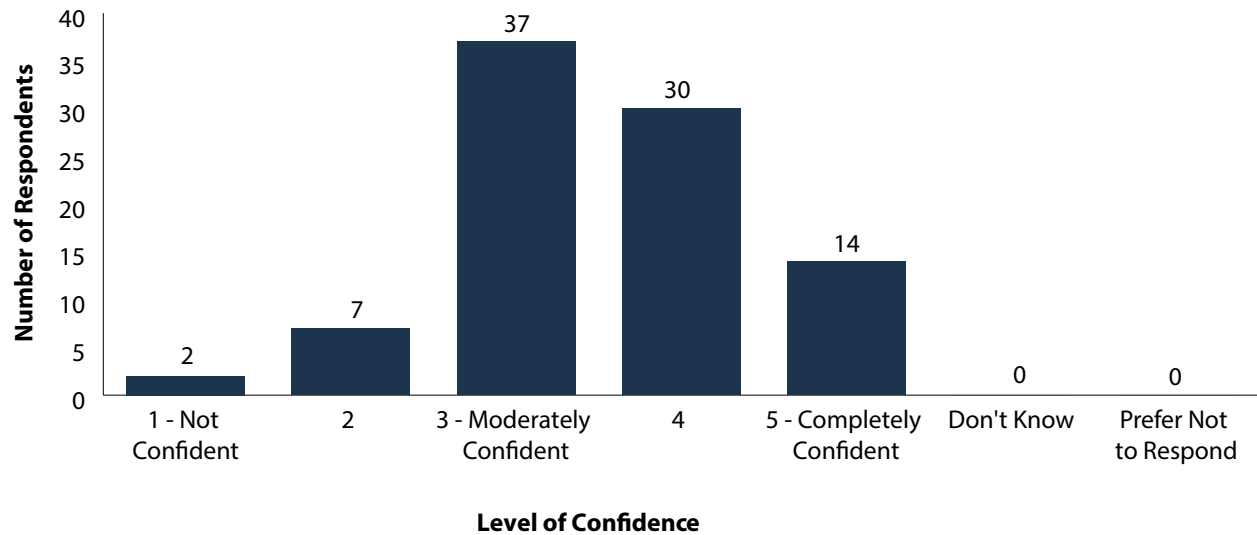


Confidence

Respondents were asked to rate their confidence about the behaviour of agents on several dimensions. Respondents were given a five-point scale on which to rate their level of confidence, with 1 being not confident and 5 being completely confident (respondents also had the option to say, “I don’t know”).

As demonstrated in Figure 5, the majority of respondents from educational institutions (90 per cent) reported that they are confident that agents provide accurate information to students. A significant portion (44 per cent) of respondents expressed a high degree of confidence in the accuracy of information agents provide to students.

Figure 5. Education Sector Respondents' Confidence that Agents Give Accurate Information to Students (n = 90)



Participants from government agencies gave responses more evenly distributed across response categories than did their colleagues in the education sector, as seen in Figure 6. In addition, none of the respondents from government stated that they were completely confident that agents representing institutions in their jurisdiction give accurate information to students.

Figure 6. Government Sector Respondents' Confidence that Agents Give Accurate Information to Students (n = 12)



Figures 7 and 8 illustrate the results when respondents were asked if they were confident that agents' activities follow laws and policies regarding international recruitment. Once again, educators expressed confidence. The majority of respondents from educational institutions (85.5 per cent) reported that they were moderately to completely confident that agents adhere to laws and policies (see Figure 7). Responses to this question by participants representing government agencies were again more evenly dispersed across categories, as Figure 8 illustrates.

Figure 7. Education Sector Respondents' Confidence that Agents' Activities Adhere to Laws/ Policies re: International Recruitment (n = 90)

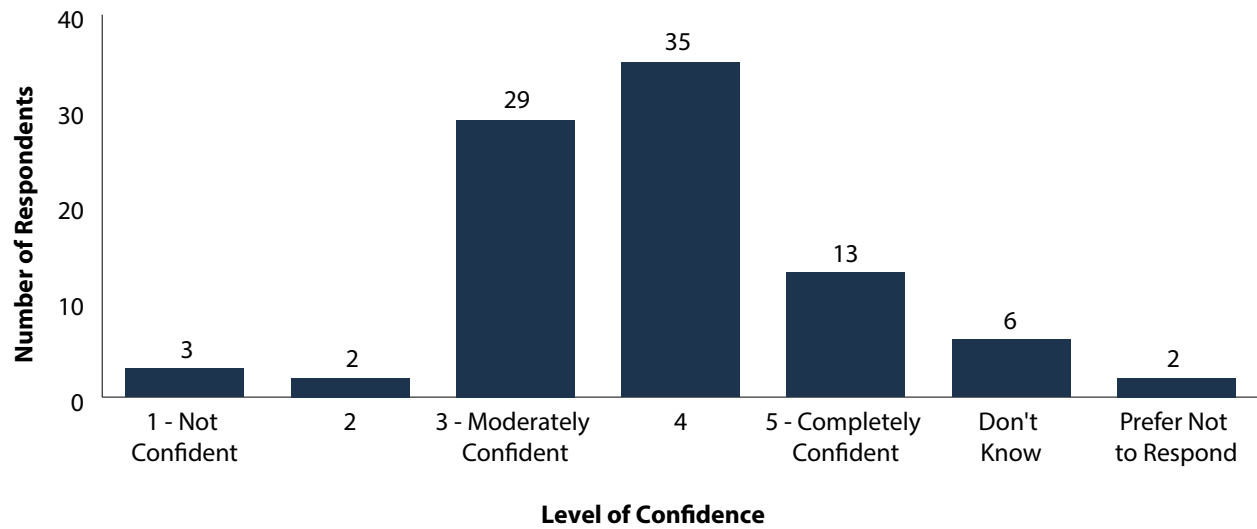
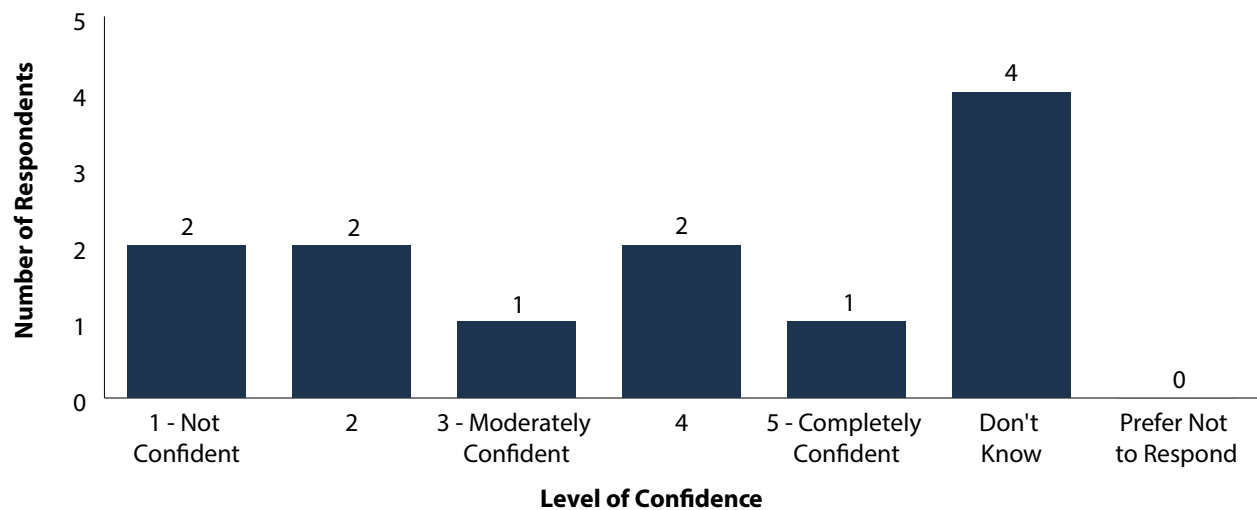


Figure 8. Government Sector Respondents' Confidence That Agent Activities Adhere to Laws/ Policies re: International Recruitment (n = 12)



Agent numbers and activity centres

Figure 9 illustrates the number of agents recruiting for institutions whose designates responded to the survey. One respondent reported 41,404 agents working for the institution, and this number is certainly an outlier. There was some uncertainty as to the accuracy of this comparatively large number, but it is nonetheless reported here for the sake of transparency.

Figure 9. Numbers of Agents Recruiting for Institutions (n= 83)

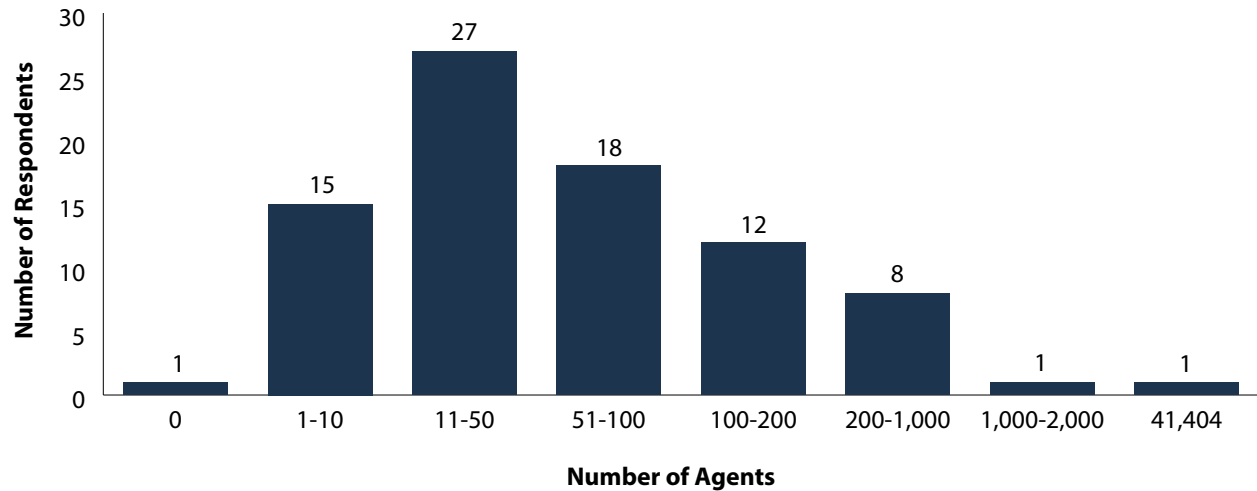


Figure 10 shows the top 10 countries in which agents are actively recruiting on behalf of Canadian institutions. Respondents reported agent activity in over 70 regions; most reported specific countries, but a few participants indicated they recruited in “Latin America,” “North Africa,” or “Eurasia,” for example. Appendix C provides a complete listing of countries in which agents are active on behalf of Canadian institutions.

Figure 10. Top 10 Countries in which Agents are Active on Behalf of Canadian Institutions

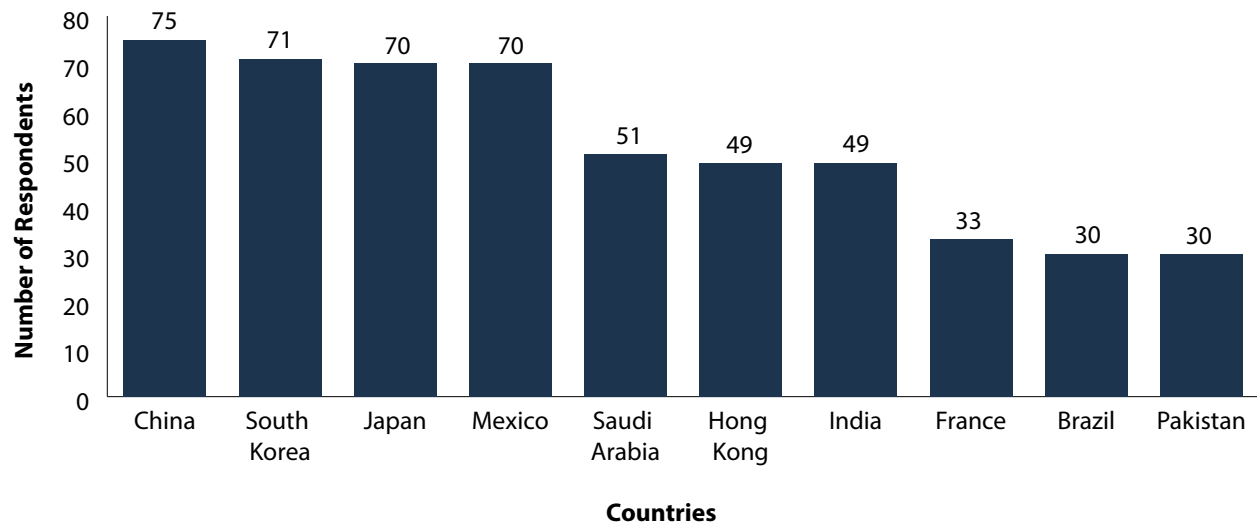
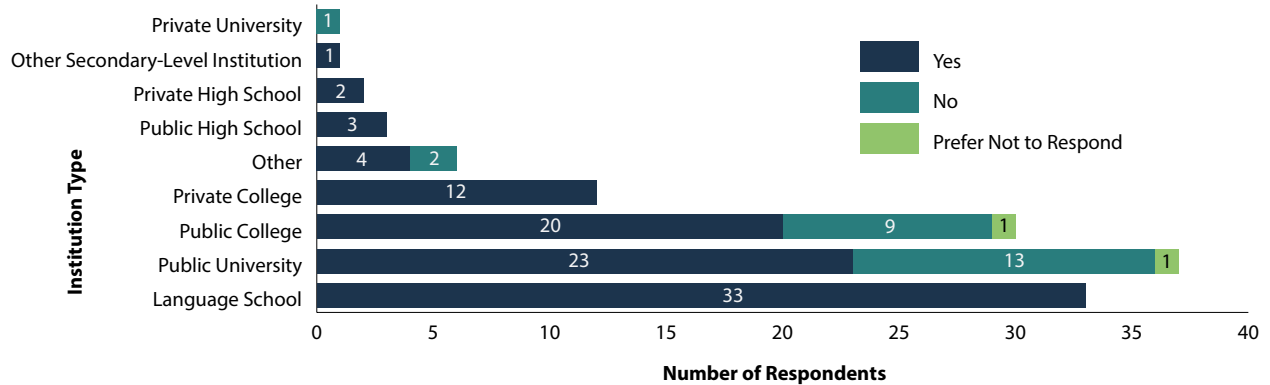


Figure 11 provides a breakdown of agent use by institution type, and it might be useful to consider these data before moving on to discuss how agents are used. Six respondents indicated “Other” when asked their institution type. Of those six, four said that their institutions did use agents, and those respondents represented a private, for-profit language school, a private trade school, and two public-school districts. The remaining two respondents from the “Other” category reported that their institutions (a private career-training institute and a cégep) did not use agents.

Figure 11. Agent Use by Institution Type (n = 125)



The Regulatory Environment for Agent Use

Both jurisdictions and professional associations have developed policies regarding agent use. Most of these are advisory in nature: codes of ethical conduct for agents and institutions, or guidelines for best practice. The non-compulsory nature of this approach is hardly surprising. The international recruitment industry has multiple stakeholders — sending and destination countries, sub-national jurisdictions, educational institutions, students and families, agents and agencies, employers, and professional associations. In some areas, their interests overlap; in others, they diverge. Policies intended to regulate agent use would likely produce both intended and unintended outcomes. For example:

- Greater constraints on agent use might both alleviate concerns about misconduct and limit the reach of recruitment efforts.
- Policies designed to curb misuse of the student-visa pathway might introduce delays that deter legitimate students from coming to Canada.
- Laws seeking to exclude bad actors from recruitment activities may also constrain legitimate business activity.
- An outright ban of agent use might both safeguard student welfare and put educational opportunities in Canada out of their reach.

These tensions are nothing new for policy analysts, but they do help explain resistance to the imposition of mandatory regulations. In this section, policy approaches to agent use both internationally and in Canada are briefly reviewed.

Australia

Australia has a vigorously entrepreneurial approach to growing its international enrolment. It has been described as “the leader in international student recruitment” (Adams, Levanthal & Connelly, 2012). Provision of educational services currently ranks as one of the country's top five exports, contributing AUD\$18.3 billion to the Australian economy in 2010 (Adams, Levanthal & Connelly, 2012). More than one in four Australian university students are international students, and Australian educational institutions enrol as many Chinese students as do their comparators in the US (Marginson, 2011). Australia was also an early adopter of the agent-recruitment model. Agents have been recruiting for all levels of the Australian education system since the late 1960s, when Australian universities collectively established one of the first recruitment agencies (Moodie, 2011).

While agent use is a long-settled practice in Australia, incidents of mistreatment of students (by agents and institutions) led to the passage of the *Education Services for Overseas Students (ESOS) Act*. The *ESOS Act* is currently considered the most comprehensive regulatory framework in the world with respect to international recruitment and enrolment. It describes very specific,

concrete obligations intended to safeguard international student welfare that institutions must meet. It also provides guidelines that govern the relationship that institutions have with agents and holds them accountable for agent misconduct. Under the terms of the *ESOS Act*, institutions must:

- use agents that are knowledgeable about the Australian education system;
- when hiring agents, always use written contracts that include a process for institutional monitoring of agent activities;
- provide agents with current, accurate information about the institution;
- not contract with or accept students from agents they believe are engaging in dishonest practices;
- terminate their contract with any agent who they suspect is engaging in dishonest practices;
- take immediate action if they become aware of any agent engaging in activities that are false, misleading, or unethical.

Australian law also requires agents operating in Australia that provide migration advice to register with a government agency. The *ESOS Act* mandates that educational institutions must not accept students from an agent they believe to be operating in violation of this law. In 2003, Australian Education International (a government agency) partnered with International Education Services (IES) and Professional International Education Resources (PIER) (a subsidiary of IES) to develop a free on-line agent-training course, which debuted in 2006. Agents who complete the course can pay AUD\$400 to take an assessment test, also offered on-line but only at specific testing centres worldwide. If they pass, they receive a Certificate of Completion, attain the rank of "Qualified Education Agent Counsellor," and can be listed in the Qualified Education Agent Counsellors Database (QEACD), a searchable on-line database (Australian Education International, 2012). The Australian government does not endorse agents, so being named to this list means only that the agent has successfully completed the course and attained this ranking. Agents are encouraged to include mention of their certification in their marketing materials. There is currently no evidence suggesting that agents who have completed this course make more money than agents who have not, or the extent to which certification influences student or institutional decisions to hire and use a particular agent.

The United Kingdom

The UK is a top destination country for international students, although a 2013 study by Universities UK (Universities UK, 2013) found that recent tightening of student-visa requirements has contributed to a recent decline in international enrolment (Adams, 2013). While government agencies have published guidelines recommending best practices (Quality Assurance Agency for Higher Education, 2012), there are currently no laws in place specifically regarding agent use. The British Council has developed a well-regarded code of practice and an

on-line agent-training course. Agents who complete the course can pay to take a written test. If they pass, they are awarded a certificate indicating their successful completion of the course. The UK requires educational institutions to obtain a licence in order to enrol or "sponsor" international students. Institutions that fail to meet the terms of their licensure risk suspension of the right to enrol international students. In 2012, the British Council joined with their counterparts in Australia, New Zealand, and Ireland to develop a common standard of practice (Jaschik, 2012). The *Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants* (widely known as the *London Statement*) is a code that establishes seven principles:

1. Agents and consultants practise responsible business ethics.
2. Agents and consultants provide current, accurate, and honest information in an ethical manner.
3. Agents and consultants develop transparent business relationships with students and providers through the use of written agreements.
4. Agents and consultants protect the interests of minors.
5. Agents and consultants provide current and up-to-date information that enables international students to make informed choices when selecting which agent or consultant to employ.
6. Agents and consultants act professionally.
7. Agents and consultants work with destination countries and providers to raise ethical standards and best practice (British Council, 2012).

Efforts are currently under way to enlist agencies in top sending countries to agree to abide by these principles. Representatives from Canada and the US participated in preliminary discussions but ultimately did not sign on (Baker, 2012).

The United States

Agent use continues to generate significant controversy in the US. Professional norms oblige admissions "counsellors" to privilege student welfare, even if it means directing them to another institution that better matches their needs and interests. Commission-based domestic student recruitment is illegal under US law, prompting critics to question the appropriateness of agent use by US institutions abroad (Altbach, 2011). Further, some critics allege that incentive-based recruitment risks putting agent profit ahead of the needs of their student clients. Proponents of agent use in international recruitment point both to the ubiquity of agent use and the presence of new competitors in a market the US has traditionally dominated. It is fair to say that the question of how best to respond to this ongoing controversy has roiled the National Association for College Admission Counseling (NACAC).

Until recently, NACAC policy proscribed agent use by institutional members. A committee struck to review this policy deliberated for nearly two years before recommending that the policy be reworded to “discourage” rather than “forbid” the practice (Fischer, 2013). This recommended policy change was adopted at NACAC’s annual conference in September 2013. It has been suggested that a softer approach to agent use is inevitable as agent use by US institutions becomes ever more commonplace (Fischer, 2013). This is evidenced by the growth of the American International Recruitment Council (AIRC), an organization created by US admissions officials to certify agents and develop a code of ethical practice.

A similar policy conflict exists within the US government. The Department of Commerce’s Gold Key Matching Services program helps US educational institutions network with agents in a particular market (U.S. Department of Commerce, 2013), while the Department of State refuses to engage with agents or support agent activities. Instead, it operates a network of advising centres around the world intended to provide international students with information about postsecondary opportunities in the US. Advising-centre staff also partner with US postsecondary administrators to promote recruitment activities (U.S. Department of State, 2013).

Canada

Agent use by Canadian educational institutions has not triggered the kind of controversy seen in the US. Both federal and provincial/territorial governments actively support international student recruitment. In 2011, the Council of the Federation proposed an international education marketing action plan (Council of the Federation, 2011) that focuses on the actions provinces and territories can undertake individually, collectively, and in collaboration with the federal government to support objectives of international education. The expected outcomes of the action plan include:

- a greater number of international students studying in Canada;
- an increased share for Canada of the international student market;
- a greater number of international students choosing to remain in Canada as permanent residents after graduation.

In 2013, the federal government announced a new international education strategic plan that included additional funding for marketing and faster processing of temporary-resident visa applications. Canadian embassies, high commissions, and consulates routinely broker meetings between agents and educational administrators. Recently, the Department of Foreign Affairs, Trade, and Development (DFATD) spearheaded the development of an on-line agent-training course, similar to programs in the UK and Australia. The course was developed in collaboration with PIER (which helped build the Australian agent course), ICEF, and the Canadian Consortium for Education Marketing (CCIEM). Its purpose is to provide agents with an introduction to Canada as a destination country for educational opportunities. Topics include a survey of Canada’s education systems; information on scholarships, study permits, student work permits, and post-graduation work permits; and how best to prepare students for life and study in

Canada. Once agents complete the course, they can choose to pay \$350 to take an examination on the course content. Agents who pass the exam are eligible to be included in an on-line directory of "Canada Course Graduates" (CCGs) on the ICEF Web site (<https://www.icef.com/agent-training/canada-course/canada-course-graduates.html>). The first examinations were held in Toronto in May 2013.

Previously, the federal government funded a network of advising centres, albeit on a much a smaller scale than that of the United States. The network was called the Canadian Education Centre (CEC) Network and was operated by a private organization. The plan was that educational institutions would collectively fund the CEC Network after federal funding ended, but institutions did not participate in numbers sufficient to maintain operations. The CEC Network closed in 2009 (Keller, 2009).

Neither the federal nor provincial/territorial governments accredit agents, nor has a regulatory framework like Australia's regarding the use of agents been created. The question of whether and how to regulate education-agent use has been subsumed by a larger debate over the role that agents play in the immigration process. Current and projected labour shortages in key occupations and in specific regions drive Canadian efforts to stimulate skilled-worker migration. Incidents of unscrupulous behaviour by immigration agents have prompted governments to regulate the industry. Manitoba has been a pacesetter in this regard. In 2008, the province introduced the *Worker Recruitment and Protection Act (WRAPA)*. Under this law, employers must register their intentions to recruit with the government and use a licensed recruiter. Recruiters must hold membership in a Canadian credentialing organization for immigration consultants and are prohibited from charging workers for recruitment (Allan, 2009).

Of late, the federal government has proposed greater regulation of international recruitment activities. In 2011, Bill C-35 amended the *Immigration and Refugee Protection Act (IRPA)*, making it "an offence for anyone other than an authorized representative to conduct business, for a fee or other consideration, at any stage of an [immigration] application or proceeding" (Citizenship and Immigration Canada, 2011). The bill also requires anyone providing paid immigration advice to be authorized in accordance with the provisions of the act. This has legal implications for education agents who also provide immigration-consulting services, both in and outside of Canada. Citizenship and Immigration Canada (CIC) maintains that education agents who have previously provided advice to students on immigration-related topics "such as applying for a study permit, re-entry visa, or status extension...will need to either become authorized or refer relevant cases to an authorized representative" (Citizenship and Immigration Canada, 2012). While the penalties if found in violation are potentially steep (a maximum fine of \$100,000 and/or imprisonment for up to two years), CIC has acknowledged that any prosecution of alleged offences would have to occur in Canada (ICEF, 2012). The Immigration Consultants of Canada Regulatory Council (ICCRC) — the regulatory body authorized by the federal government — issued an open letter to Canadian educational institutions asking them to help "protect international students by encouraging their recruiters to operate within Canadian laws" (Immigration Consultants of Canada Regulatory Council, 2012). Given the challenge in enforcing the law outside Canada, it is unclear what effect Bill C-35 will have on agents

operating outside Canada.

Though tangential to the issue of international recruitment, a brief discussion of recent policy developments in Canada regarding international enrolment may be useful here. The federal government has also proposed new regulatory changes regarding international enrolment (Citizenship and Immigration Canada, 2013). In December 2012, the Hon. Jason Kenney, Canada's Minister of Employment and Social Development and Minister for Multiculturalism, proposed changes in the International Student Program (ISP) that would, as in the UK, "limit... study permits to students attending institutions designated by provinces and territories" (Citizenship and Immigration Canada, 2012). The changes would also require study-permit holders (who currently must only demonstrate "intent to study") to enrol and actively pursue a course of study in order to maintain legal status. One administrator interviewed for this report predicted a "shakeout" in the education sector as a result, as "some institutions that would have expected to be designated may not be."

With regard to ISP, provinces and territories have begun to develop responses to the federal government's proposed policy changes. For example, earlier in 2013, Nova Scotia enacted new legislation that requires language schools to receive government approval to enrol international students (Thomas, 2013). All jurisdictions will develop their own framework to meet the requirements of the changes to ISP and determine which of their institutions will be eligible to host international students.

Most provinces and territories have left the issue of education-agent oversight and management unaddressed. A notable exception is Manitoba, which introduced legislation in May 2013 intended to regulate all educational institutions (or "providers") that enrol international students, as well as agent ("recruiter") activities (Government of Manitoba, 2013a). Provisions of Manitoba's *International Education Act* include:

- the requirement that only designated education providers can enrol international students (universities, colleges, school divisions, private schools, and accredited language schools receive automatic designation);
- the establishment of a code of practice and conduct to which all education providers and recruiters are obliged to adhere;
- the requirement that education providers maintain a list of all recruiters and recruitment agencies on their Web sites;
- the stipulation that education providers "must not knowingly permit the recruiter to contravene a provision of this Act or the code of practice and conduct";
- the requirement that recruiters "must not engage in misleading or deceptive conduct in connection with the recruitment of prospective international students" (Government of

Manitoba, 2013b).

This bill aligns Manitoba much more closely with the Australian approach to regulating international education activities.

Why, Which, and How Educational Institutions Work with Agents

Canadian educational institutions use agents for three primary reasons. First, agents can provide an efficient, cost-effective way for institutions to recruit in circumstances where and when they lack the time, resources, or acumen to do it themselves. As one college administrator stated, "it's essentially impossible to operate at the scale we do without using a network of people in other countries to support the work.... In certain markets, to reach students, you have to use agents. They're just not accessible otherwise, in any great number." A university official agreed that agents "have location and...knowledge of the customs and traditions of the local community, and so they can do things that you can't."

Second, institutions believe that not using agents would put them at a significant competitive disadvantage vis-à-vis other top destination countries like the United States: "American institutions don't need to pay the agents. The students will pay the agents themselves, and they can still yield students. That's not necessarily the case for a country like Canada." This same administrator believed that ceasing agent use would also harm his college's competitive standing with peer Canadian institutions. He saw his college as competing with peer institutions for attention from both students and agents. "I would say you have to compete with Canadian peers in terms of your agent relations as well as the students."

Lastly, institutions use agents as a response to student preference. "There's a comfort level in working with somebody who is local, has good knowledge, and can guide you through the process in your own language...in ways that are culturally appropriate," explained an administrator interviewed for this report. Another official suggested that students and their families were more likely to trust a local intermediary than an institutional representative: "They prefer to put their trust in someone that speaks their own language and understands them and their needs."

As discussed earlier, most Quebec education officials surveyed for this report described a vastly different landscape for recruitment. While international students come from everywhere and travel everywhere in pursuit of educational opportunity, Quebec's historical, linguistic, and cultural ties to *la Francophonie* differentiate it from most other jurisdictions in Canada. Noting the global demand for English-language instruction, one Quebec official suggested that this explained the disinclination to use agents. "The main reason why students want to study in Canada is to learn English, and very few of our institutions offer instruction in English.... If you look at our institutions, there are very few...represented in China or Asia. Their activities...take place within the francophone world."

Those activities include the development of partnerships with other educational institutions and organizations in francophone countries. These agreements often include provisions for non-Quebec students to attend Quebec institutions with full tuition waivers. "For us," one administrator explained, "recruiting international students is really not a profit-making venture." Instead, institutions may pursue these exchanges in "solidarity" with other francophone

jurisdictions. When asked to explain what she meant by “solidarity,” one official said, “International solidarity means that we create partnerships with countries that have higher needs, a higher need for training.... We don’t just cherry-pick the best students in Africa or Haiti and keep them here.... We target countries that...aren’t managing to train all their students.... We have an ethical approach when we choose the number of students we want to recruit.... We want to create [sustainable] partnerships with institutions [that have] students who have the potential to complete their studies but don’t necessarily have the resources to do so.” This philosophy echoes an earlier era of Canadian internationalization, when government and institutions saw international enrolment in terms of capacity building in developing countries and often permitted international students to pay domestic rates (Rizvi, 2011).

Institutions that work with agents draw frequently upon publications, reports, best practices, and material produced by other organizations involved in international recruitment (e.g., CBIE). Administrators frequently mentioned finding this material helpful in developing a contract, code of practice, or other documents governing their relationships with agents. Institutions or individuals who belong to professional associations may also be obliged to follow a code of ethical practice as a condition of membership. As to individual institutions, responsibility for policy development regarding international recruitment often sits entirely within an admissions office. One administrator interviewed suggested that this practice might create a blind spot in terms of the impact of agent misconduct on other institutional interests. In contrast, at his campus, “it’s centred in the middle of the internationalization file, and so I think about it terms of how...this impacts my partnerships to get research grants....Whoever is signing these [agent] contracts has got to be thinking about brand...because everything affects everything.”

Agent Use across and within Education Sectors in Canada

In this section, patterns of agent use across education sectors within Canada are identified. How institutions screen and hire agents, how contracts and remuneration are determined, current practice with regard to oversight, agent misbehaviour, and institutional detection and response is also discussed.

Agent use by K–12 institutions

While agent use is highly concentrated in the postsecondary sector, the K–12 sector is engaging agents at an increasing rate. The 88 school districts represented by the Canadian Association of Public Schools - International (CAPS-I) currently enrol approximately 20,000 international students (Thomas, 2012). Several factors appear to be driving this growth. First, the reputation for quality that education in Canada enjoys overseas has helped position Canadian public schools as a cost-effective, high-value alternative to more expensive private institutions. Second, local demand in regions with large immigrant communities may also stimulate international enrolment. As one official explained, “Local relatives or friends of families of children who lived overseas...approached our school district and said, ‘we’d like to...have our niece or nephew or someone come and live with us and attend public school here.’”

Finally, for parents of younger students, an agent can be a helpful local contact and intermediary even after their son or daughter has started school. “We recognize that parents would prefer somebody local to...ask follow-up questions...and to go to if there’s some kind of issue that arises,” explained one school-board official. This is particularly useful when a language barrier prevents parents and school officials from communicating directly. “If an issue arises, we can have the agent speak with the parents about it. We know we have somebody who’s representing the issue well to the parents and [who is then] communicating...the parents’ wishes [to us].” Although the district had multilingual staff members available to assist, this official indicated that using the agent as a go-between was often preferable. “[We know they’re] trusted partner[s] that...[are] going to help solve any issues that arise. That is the very best situation for us. They really do become true partners.”

Even though some parallels were found between the experiences of K–12 administrators and postsecondary administrators, very few K–12 administrators participated in the study. As such, evidence regarding the use of agents by K–12 institutions in Canada’s education systems remains very limited. This may be an important area for future research.

Agent use by postsecondary institutions

More than 70 per cent of all international students in Canada in 2010 were enrolled in postsecondary institutions (Department of Foreign Affairs and International Trade, 2012), which helps explain the concentration of agent use in this sector. That said, not all postsecondary institutions use agents. Perceived institutional reputation overseas (or the lack thereof) is a powerful influence on this decision. As discussed, the recruitment environment for international students is intensely competitive. Because many students and their families are unfamiliar

with postsecondary systems in other countries, an institution's reputation can play a significant role in driving decision making. The growing proliferation, influence, and use of postsecondary "league tables" (i.e., rankings) such as the *Times Higher Education World University Rankings*, the *Academic Ranking of World Universities* (compiled by researchers at Shanghai Jiao Tong University), or the *QS World University Rankings*, has partially been driven by students and parents seeking information about overseas institutions.

An emphasis on reputation privileges what Marginson (2007; 2009) has termed "super-league" institutions. These elite universities "have gained unprecedented visibility and immediacy in the global era.... Their degrees and research carry exceptional credibility, and the leading group are household names" (2007, p. 10). Super-league institutions (e.g., Harvard, Oxford) maintain their exclusivity in part through extraordinarily high admission standards, and because their reputations make them "global demand magnets" (Marginson, 2007, p. 10), they engage in little direct international recruitment activity.

For institutions outside this super league, lack of name recognition internationally requires them to invest in recruitment and marketing campaigns to help build brand awareness. The less well-known an institution (or institution type), the more likely it is to use agents. As one administrator explained, "The college sector...has used agents extensively.... [They] are not well understood internationally [and thus] explanation is needed. I would say the vast majority of...colleges use agents. And then, of course, the...smaller, lesser-known universities [are] in the same position of needing...people who can explain their value-add. The large, researcher-intensive universities...that appear in the ranking systems have...less [need] of agents." Similarly, institutions in regions that are less well-known abroad may turn to agents to better compete with comparator schools in "MTV" (Montreal, Toronto, and Vancouver).

To be effective, international recruitment requires time, money, and staff sufficiently familiar with language and customs; institutions outside the super-league tier, particularly those without a history of international recruitment, often lack all three. Institutions that contract with agents are not simply purchasing a local presence in a particular market; they are buying access to the agents' local networks, their language skills and status as cultural insiders, and their familiarity with the needs of students and parents. "[With agents], you can operate at a scale, a breadth that you could never get to otherwise," said one college administrator. "[You get] really quick access to local markets. [It's] naïve...[to think] that you're going to stand at a college fair and that they'll just come and you'll be able to enrol them. You don't have enough staff [and] you don't understand the local culture and expectations. You could be there at the wrong time. You have to be in multiple places at the same time. [Agents are] essential to manage scale." Because they work on commission and are in situ, agents are a cost-effective alternative to sending institutional staff to recruit: "I could put you on the road to recruit for the university, and you might come back with nobody, [and] I still have to pay you.... I don't pay agents for anything unless they bring me students."

Institutions that enjoy some degree of name recognition overseas and do not mostly or exclusively enrol international students may be in the best position to maximize the benefits of

agent use while limiting their exposure to agent misbehaviour. Institutions in this position can be more discerning in hiring agents, insist they conform to higher standards of practice, and demand transparency from them. Over time, such institutions end up retaining a fairly stable pool of trusted agents, only occasionally hiring on the margins to fill a vacancy or explore a new market. In contrast, smaller, often private institutions like language schools and career colleges may be the most dependent on agents and thus the most vulnerable to bad actors (examples are provided during our discussion of agent misconduct later in this report).

Many private institutions are entrepreneurial ventures, established with international students as their primary market. Through targeted interviews, it was apparent that some of these institutions were founded by individuals with prior experience in international recruitment who expected to rely on agents to send them students. Institutions with long-established local and domestic catchment areas may view international recruitment and agent use as optional, whereas for some small, private institutions, their existence may depend on agents. As one language-school administrator recalled, "we knew of a school [that] tried to set [itself] up only dealing directly with students. It was a very bad business decision for them. They essentially ended up folding. Agents are absolutely essential for getting the numbers of students that are needed."

Agent hiring and contracts

Both students and educational institutions hire and use agents. Transactions involving these groups of actors occur in three different configurations:

1. An institution may hire an agent to represent it. The agent in turn offers his or her assistance to prospective students for free, provided they choose to apply to the institution the agent represents. In these circumstances, the institution bears the total cost of the agent's services and pays the agent a commission.
2. A student may hire an agent to help identify a suitable educational destination and help him or her apply to the institution. The institution itself may not use agents, or may not use this particular agent, and thus may be completely unaware that the student has hired an agent. In these circumstances, the student bears the total cost of the agent's services.
3. Students and institutions may hire and use the same agent to assist them. The institution hires the agent to recruit, while the student hires the agent to assist with the application process. The students, who pay a fee to the agent, may not always be aware that the agent is receiving a commission from the institution.

Beyond requiring that an agent be trained or certified through a recognized entity like the British Council, International Consultants for Education and Fairs (ICEF), or AIRC (itself no guarantee of good behaviour), institutions must rely on references and word of mouth when weighing the decision to hire an agent (Krasocki, 2002).

Institutional practice in Canada with regard to the screening and hiring of agents varies significantly. One university worked with a consulting firm to help design what one administrator described as a “quality assurance framework” for vetting prospective agents. In this process, prospective agents had to be certified by completing an ICEF, British Council, or AIRC agent course in order to be considered. Next steps included a meeting (face-to-face or technology-assisted) with the administrator, review by a selection committee (whose members included faculty members and international centre staff), and reference checks. Agents who were ultimately hired got a one-year, renewable contract that included specific language about enrolment goals, performance expectations, standards of conduct, and the commission. Failure to recruit during the period of the contract would result in contract termination with no possibility of renewal. As this administrator explained, using one-year contracts allows the university “to sign a lot of people, then figure out who...gets to stay. It’s always better to work with less than more.” One school district official described her organization’s vetting process: “We have a basic [set of] criteria that we give to...people that we are interested in signing up. [Prospective agents] have to provide a business licence...a brochure, their promotional information... information about their agency...who owns [the agency]...and how many cities they have a presence in.... We also ask them for three references and we call [the references].”

Other institutions’ screening processes are much less extensive. One university administrator described putting agent candidates through what one official called a “trial period.” “[When] an agent first requests to send us students, if they send us five students within...one year, then we will consider [the agent]. Once they’ve done that, then [we ask the agent for] references... preferably from Canadian institutions...and preferably university-based.... If they do pass, we would pay them retroactively.”

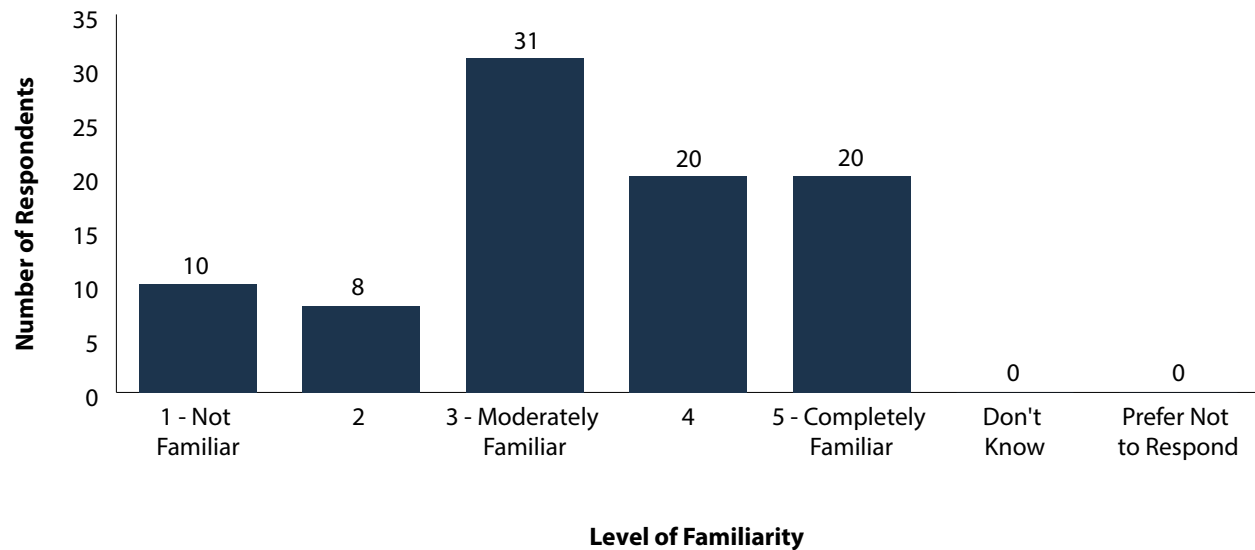
Many other institutions sign open-ended or multi-year contracts and do not purge unproductive agents from their rolls, which sometimes makes it difficult for them to identify how many agents work for them. One administrator at an institution using this practice answered, “100, but...of those, there [are] probably 20 that are really active.” When asked to explain further, she said that “passive” agents had “probably applied to be [agents] officially.... However, we have yet to receive students from them. Or [else] because of visa issues, it’s extremely difficult for them to send students to us, so...we don’t expect very much from them.” Another administrator at a college with the same practices estimated having a total of 1,000 agents under contract, even as the vast majority of them were inactive. A college official elsewhere described the same phenomenon: “The problem is, a lot of these agents are not *real*. They’re looking into getting [a] contract [with our college] to show students, ‘Look, I have this many agreements with this many institutions.’...They [try] to get a letter (contract) with us, and [then] they disappear.”

One university administrator suggested that the bare-minimum screening of agents is not uncommon: “What you should never do — never, ever, ever — is just take an e-mail and then send them a contract. And I believe that’s done more [often] than not.”

Agent remuneration

Figure 12 illustrates how familiar educational institution respondents are with fees that agents charge their students. Respondents were given a five-point scale on which to rate their familiarity, with 1 being not familiar and 5 being completely familiar. It is worth noting that over 25 per cent of participants are not particularly familiar with what students are charged by agents.

Figure 12. Familiarity of Education Sector Respondents re: Fees Charged to Students by Agents (n = 89)



Although the amount and how it is calculated varies markedly across Canada, institutions generally offer successful agents some percentage of the student's first-year tuition. Institutions may set different commission rates for agents in different markets or for different courses of study. As one college administrator explained, "[our compensation] is almost entirely standard. There's one [rate] set for India, which is low, but because of our geography and our expat community,¹ that's not a problem. And there's another one for pretty much everybody else, and then there's one for ESL that's slightly more than that." Similarly, a school-district official described a two-rate system: 10 per cent generally and 15 per cent in markets where "we feel we have to pay a higher rate to be competitive."

In some cases, in more competitive local markets, an "industry standard" may emerge — an informal consensus on the part of competitor institutions. Changes in the status quo can have a dramatic effect. One career-college administrator described a recent incident in which a rival college offered agents a 40 per cent commission (well over the local industry standard at the time) in a bid to increase its market share. "They say, 'OK, you give me 40 per cent, [and]

1 The presence of a nearby expatriate community (with its resources, restaurants and shops) is generally an attractor for prospective students from that country (Pablo, 2012). This also makes it more likely that people in that country have heard of the recruiting institution, making agents less essential.

I'll push all the students to you,' so that's what they do," she recalled. In turn, some agents refunded a portion back to their student clients as an incentive to work with them. Students whose agents opted not to do so learned about the practice and bitterly protested to their agents that they had been "cheated." Feeling burned by the whole affair, agents in this market decided, "OK, we're not going to send students to [Canadian city] anymore," which led to significant declines in enrolment at career colleges in the region. In essence, the overambitious college and its agents had "killed the market," explained the administrator.

Another postsecondary administrator likened the competition over commission packages to an "arms race, big time, more so than anything I've ever seen in Canada in enrolment management, and I've worked in this capacity for the past 25 years." He described an environment in which educational institutions competed with one another to sweeten the pot for agents: "College X is paying this, College Y is incenting [sic] them this way, College Z is, you know, paying for the second year, and College ABC there, well, if you graduate, they're giving an incentive."

Agent oversight and training

Institutional practice with regard to agent oversight and training varies considerably. While some institutions have developed robust mechanisms for ensuring that agents receive ongoing training and supervision, other institutions provide little to no training or supervision. In this section, both approaches are discussed, and specific examples of agent-management protocols are provided.

Many professional and industry-related associations have developed best-practice guides or principles with regard to agent oversight and training. The interviews with institutional administrators suggest that it is common for institutions to reference these guides when developing their agent-management practices. Some administrators interviewed for this study mentioned the *Code of Ethical Practice*, developed by the CBIE, as a helpful guide. The code stipulates that institutional members should "appoint advisers, counsellors, and other representatives who have the requisite competencies, training and experience to offer support services, and provide them with appropriate resources and opportunities for professional activities" (Canadian Bureau for International Education, 2013). One administrator, whose institution is currently developing its agent-management protocols, mentioned referencing similar codes developed in the UK, Australia, the Netherlands, and the US.

This same administrator described his institution's agent-oversight and -training efforts: "What we're developing right now is really a QA (quality assurance) process for agents and a review process to...stiffen it up a little bit in terms of [regular] evaluation, to make sure that they're upholding...the kind of...principles that we expect our partners to uphold." Five managers employed by the college provide ongoing support to their agent network, assisting with a student and his or her family, answering questions, and leading training seminars. This official estimated that managers spent 10 to 14 weeks a year in-country. "It's a model where we're in constant, constant contact." This college also involved its internal marketing team to

develop training and promotional materials specifically for agent use. "We're bolstering our print materials for agents and equipping them with the right tools to make sure they're giving students the right answers."

Another official interviewed explained that his institution offered both in-country and campus-based training for its recruiters in the past and is currently developing a series of asynchronous, on-line training modules that recruiters can review and complete at their discretion. On the horizon is an annual agent conference organized by the institution, where agents will receive training, take tours of the campus, and participate in an awards ceremony where agent excellence will be recognized. More broadly, agents also have access to training opportunities (both in-country and at conferences) sponsored by the federal government as part of its promotional activities.

In contrast to the practices described above, some institutions provide almost no oversight or training. One administrator said that her institution provided agents with promotional material to share with students and a manual that provided general information. It occasionally offers webinars for agents, but she admitted they were typically "very poorly attended." A university official interviewed said his institution was in the process of developing a training program but had not yet implemented these plans. In the meantime, newsletters are occasionally sent out to agents to apprise them of new program offerings.

With regard to oversight, some institutions rely entirely on self-reporting from students, parents, or colleagues to pinpoint areas of concern. One language-school administrator said, "If something's brought to our attention, then we [can] act on it, but it's rarely brought to our attention. And because of language issues, it's very difficult for us to assess compliance in the agent's home country. So it tends to come down to students telling us, 'Well, the agent told me this' ...That's more how we would recognize a good agent versus a bad agent." One official suggested that her school district will learn about agent misconduct "because we'll find out from parents...or colleagues in other school districts."

Complicating oversight further is the possibility that an agent has hired sub-agents. As one school-district official explained, "There's a whole infrastructure of sub-agents attached to bigger agencies [in large sending countries].... The agents will give incentives to their sub-agents to promote programs in that particular community, and then use the main agency as a kind of clearinghouse [for] the referrals that the agent's getting." It is not clear that institutions are always aware when a secondary network of representatives is operating on their behalf at even more of a remove than the agents they've hired.

Despite this significant variance in reported agent-oversight and training practices, a majority of administrators interviewed reported feeling confident that their agents provide accurate information. This finding aligns with the results of our survey, which found that a significant majority of institutional respondents (90 per cent) reported being moderately or completely confident that their agents provide accurate information. No relationship between administrator confidence and the degree to which their institutions engage in agent oversight and training was found in the interview data. It may be that, for some respondents, their confidence is rooted in

the assumption that “no news is good news.” In other words, if no student or parent complains, then administrators infer that the agent is providing accurate information.

Not all administrators interviewed expressed confidence in their agents' work. One administrator encountered poor agent work so frequently that she had resorted to meeting with incoming students to ensure the college matched their expectations. “Most agencies, they don't even bother explaining [the college's programs] to students anymore. They'll just send the student to me.” This interview stood out in providing an unusually vivid and frank account of chronic agent misconduct. While conclusions about how widespread agent misconduct is cannot be drawn from this one interview, the fact that the respondent reported working with multiple agents from multiple agencies suggests this problem may be more common. Additional examples from this interview are provided in the next section.

Agent misconduct

International student recruitment is a complex, multi-jurisdictional, and under-regulated industry. The same language and distance barriers that make agents useful intermediaries can also make it challenging for their clients to practise effective oversight and assess their trustworthiness.

An agent's value is related to the knowledge and access that he or she possesses. Students and institutions that choose to work with agents are purchasing the agent's expertise. However, they also assume some level of risk in trusting that the agent will put the best interests of the student or institution before personal profit, and agents can behave badly in many ways. The negative actions of agents can adversely impact one or more of their stakeholders; for example, institutions risk damage to their reputations and thus their recruitment efforts in a particular market, and students risk getting poor or inaccurate advice and ending up at an institution that is a poor match for them. Agents may also unwittingly permit individuals (with agent assistance) to misuse Canada's student-visa pathway to gain access to a work permit. Even when they are aware of the possibility of agent misbehaviour, students and institutions may not possess the knowledge or ability to evaluate and mitigate this risk.

Media coverage of agent use frequently references incidents of agent misconduct. In 2012, agents affiliated with Concordia University were found to have arranged substandard homestay accommodations for Chinese students. Concordia's student newspaper reported that one student shared a house with 12 other people and where meals frequently consisted only of slices of bread (Keung, 2012). *Bloomberg News* reported on a case in 2011 involving several Chinese students whose agent led them to believe they had been accepted to the University of Connecticut. On arrival in the US, they discovered they had instead been enrolled at a small regional branch campus that was ill equipped to support international students. The agent had been hired not by the campus, but by the owner of a nearby student housing complex, who was charging the students \$9,000 more for room and board than they would have paid at the flagship campus (Golden, 2011). One of China's largest agencies requires its clients to pay them 10 per cent of any financial aid or scholarship monies awarded (Golden, 2011). A 2010 report

by Zinch China (a consulting company that advises educational institutions on recruitment strategies) found widespread agency use of “ghostwriters” in writing application essays and personal statements on their clients’ behalf (Wilhelm, 2010; Ma, 2012). One former agency employee reported being paid \$8 a day to write application essays for applicants (Golden, 2011).

As discussed, an institution’s exposure to agent misconduct may be related to its level of dependence on agents. Educational institutions in Canada benefit in many ways from an increase in their international enrolment, so it is not surprising that so many of them actively recruit internationally. That said, there is a difference between recruiting as a strategy to advance institutional objectives (e.g., additional revenue, an enriched classroom environment, cross-cultural learning) and recruiting as a matter of institutional survival. Institutions with healthy domestic enrolments can take steps that maximize the benefits of agent use while limiting exposure to the risks; institutions that depend on international students may be in a more vulnerable position.

One risk-avoidance strategy is to use only agents who have completed an agent-training course such as those offered by the British Council, ICEF, AIRC, or a similar organization. One university administrator estimated that “maybe 20 per cent” of the agents that contact him meet that criterion. “There are a whole lot of people who hang shingles out.... They haven’t gone through any training. They haven’t worked for anybody...they just think this is a great way to make a living.”

Officials that reported infrequent experiences with agent fraudulence often attributed it to the long-term relationships they had with a well-established pool of agents whom they considered to be “trusted partners.” As one school district administrator explained, “we’re almost never dealing with anybody new.” A college official suggested that agent self-interest motivated them to behave ethically if they hoped for long careers in recruitment: “A lot of these agents are in it for the long haul. If they can place a student properly...they have a chance of getting that student’s cousin, or brother, or friend, or relative.... If you look at Nigeria...China...India, the local market for agents is very, very crowded. If you want to stay in business for any length of time, you have to have a long-term view.”

In contrast, some administrators at smaller, private colleges may feel they cannot afford to be as discriminating when agents approach them. There is evidence that some feel compelled to accept agent misbehaviour even when it has an adverse impact on students or the institution. One career-college administrator whose experience is referenced in the previous section described several incidents in which agents provided inaccurate information to students or misrepresented the student-visa and work-permit process. Over time, she became accustomed to helping students solve problems that their agents had either caused or could not manage: “When [students’ problems] get complicated, most agents ask me to help, and I jump in. It’s not my job — agents [are] supposed to do it. But [the] majority of them have no clue how to do it.”

Her willingness to assist led students at other colleges to also seek help from her. In one instance, a Korean student who was enrolled elsewhere contacted her. Her student visa had expired, and the grace period that students are given to address the issue was nearly at an end. When the administrator contacted the student's agency to raise the issue, she learned that the agent was a new hire and had no idea how to advise the student. The administrator offered to take over the student's case, and the agent, relieved, readily agreed. "I spent a lot of time to fix the mess that she (the agent) created." After this incident, the student stopped working with her agent and came to rely solely on the administrator for assistance. "Agents should [be assisting her, but] she doesn't trust [this] agency.... So I had to do it for her...spend my time doing it and still paying the agency.... It's so weird, but it happens.... I feel so bad for [students] because some of them are really, really misled, and government will punish them, not the agent. It's so unfair."

This administrator's tolerance of agent misconduct was an expression of her respect for the sway agents hold over her college's recruitment market. Even as she insisted that her college was not dependent on agents the way others were, when asked why she did not challenge agent misconduct more often, she replied, "Then what happens is that we're not going to get any more referrals."

Detection of agent misconduct and institutional response

The more oversight and monitoring an institution engages in, the greater the likelihood of detecting agent misconduct. Institutional representatives readily identified examples of agent actions that constituted grounds for contract termination. These generally involved:

- fiscal misconduct (e.g., failing to forward student fees; collecting tuition fees without permission from the institution);
- misrepresentation of the institution (e.g., providing inaccurate information about courses of study);
- attempting to subvert the application process (e.g., submitting falsified grade records);
- poor treatment of students and parents; or,
- actions that facilitated illegal activity (e.g., attempt to subvert the student visa process).

"If there's any sense that there's something fraudulent going on in terms of [misrepresenting] academic credentials, or if there's any sense that a student has been...taken advantage of, [that's] something we'd look at very carefully," explained one college representative. A school-district official echoed this sentiment: "As soon as we find that an agent is not doing something that we expect [him or her] to do...we'll drop [him or her] as an agent."

There is no Canada-wide policy framework in place to investigate and report agent misconduct and no formal procedure for sharing information when an institution or student has been victimized. One administrator with an international education organization mentioned that her group's annual conference provided an opportunity for sharing information about negative agent experiences. "Increasingly, we do have these kinds of [conversations occurring]. It's very difficult because you have to avoid naming names...but behind the scenes, you have to.... Canadian institutions have to work together and advise their peers when they've had a bad experience. I think that will increasingly have to happen."

Why and How Students and Parents Use Agents

Students and their parents hire agents for some of the same reasons that institutions do. Lacking experience and familiarity with a prospective destination country overseas, many families find it difficult to comprehend complex visa and application processes, evaluate institutions, credentials, and programs of study, and determine which school best fits the student's needs and interests (Pimpa, 2001, 2003). A language barrier and geographic distance may make it difficult to access the information and assistance provided to prospective students directly by the institution, especially for parents. Students and parents may worry that these factors may compromise the student's chance for admission to the school of his or her choice. Options for work authorization, permanent residency, and migration may be more salient to the family's overall objective in sending a student abroad — topics the institution may be unprepared to discuss. Given the significant financial resources needed to send a child overseas for schooling, making such an important decision unassisted may carry an unacceptable amount of risk (Loudon & Bitta, 1988; as cited in Pimpa, 2001). When faced with these circumstances, families will often choose to seek advice from an agent.

There is evidence to suggest that, in some countries, there is a cultural preference for using an intermediary to help manage important transactions (Bodycott & Lai, 2012; Bodycott, 2009; Whitcomb, Erdener & Li, 1998). This finding is consistent with comments made by administrators in our study. As one official observed, "In some markets, the trust is more with somebody from their country than it is with an institution in the Western world. They prefer to put their trust in someone that speaks their own language and understands them and their needs." This trust may not be absolute: a recent study of Chinese parents found them unwilling to completely trust agents' advice, even if they had taken the initiative to hire them (Bodycott, 2009). Stories of agent misconduct shared by friends and relatives, coupled with the financial cost incurred by involving agents, made Chinese parents wary of them (p. 358). Research involving the experiences of Thai students found them equally ambivalent about trusting agents' advice (Pimpa, 2001). As one student reported in the study, "I listened to them and received some information from them, but I did not totally trust them" (p. 11). Studies also suggest that agents, teachers, parents, family members, and peers all influence student choice in different ways and at different time points in the search for educational opportunities abroad (Pimpa, 2001, 2003; Wang, 2007; Bodycott & Lai, 2012).

Agents and students connect in a variety of ways — through education fairs and workshops, in response to advertising and social media campaigns, and through recommendations from friends and family. Agents may use marketing materials provided to them by the institutions they represent or produce their own (another potential area of concern for institutions with regard to oversight). In some cases, students are not the primary clients: parents may vet, hire, and consult with agents on their behalf. The level, type, and sophistication of agent services vary significantly. Larger agencies may feature teams of specialists assisting a single student client. Services may include assistance with identifying the institution, degree level, and course of study that meet the student's needs; compiling and submitting grade records and test scores; translating documents; preparing for visa interviews; and serving as a liaison between the

institution and the student and parents. In some cases, this relationship continues well after the student has matriculated, particularly where a language barrier limits direct communication.

If and how much agents charge students for their services varies from country to country. One administrator explained that it is uncommon for agents in India to charge for their services, although they may assess (minimal) charges for specific kinds of assistance. Chinese practice is completely different. "In China, they'll charge the student more than they'll charge the university. So you've got double fees going on here: \$8,000 to \$10,000 a student they could charge for the purposes of getting them to a university, and then the university gets charged... another \$2,000. So you've got potentially as much as \$12,000 to \$14,000 per student being made in China, whereas in India, [it's] \$2,000."

Critics frequently cite the issue of agent fees as an area of concern. Institutions typically do not ask for a fee schedule from the agents they hire and so may not know what students pay for their assistance. It is unclear whether agents recruiting on commission always disclose this to their student clients. A lack of transparency may conceal agent practices that could reflect poorly on the institutions they represent. It can be argued that setting fee amounts falls within the agent's remit, not the institution's; in a free market, agents can price their services however they like, and their clients can decide whether the added value that the agent promises is worth what they charge. On the other hand, the institution's reputation and brand may suffer if its representatives charge exorbitant fees for assistance. One administrator cited this as a rationale for requiring agents to provide their fee rates in order to receive a contract. "Part of our decision as to whether to keep that agent or not is if we feel they're gouging our students." One Quebec institution that uses agents specifically forbids them from charging students, save for fees associated with submitting the application.

Conclusion

Our study reveals that agent use by Canadian educational institutions is widespread, although patterns of use differ by institution level, type, and jurisdiction. Growing numbers of educational institutions in the K–12 sector are recruiting internationally and using agents, led by pioneering school districts/divisions and private institutions that have been active on this front for decades. While some educational institutions in Quebec use agents, many others recruit international students as part of broader engagement strategies designed to promote cultural exchange. Since such schemes often involve providing international students with tuition waivers, institutions do not pursue recruitment as a profit-making venture and thus do not hire agents.

Institutional practice with regard to agent management varies significantly. Some institutions carefully screen prospective agents, hold agents to high standards, invest in agent success through ongoing training, resources, and oversight, and terminate contracts when evidence of misconduct surfaces. Others are in the process of developing protocols regarding agent use with support from key campus stakeholders and with a view to protecting both student welfare and brand reputation. These actions represent current best practices by Canadian educational institutions that use agents to support international recruitment activities. Other institutions do almost none of these things, relying on agents to recognize that longevity and success in the industry requires ethical behaviour.

This study suggests that the more reliant an institution is on agents to deliver students, the less likely they are to have well-developed screening, training, and oversight protocols in place, and the more likely they are to tolerate poor agent behaviour and service. Institutions whose agent networks were long established with little to no turnover reported the greatest satisfaction with and confidence in their agents. Administrators consistently reported that references from colleagues — particularly from peer institutions in Canada — were helpful when screening prospective agents. While informal opportunities exist for educational officials to share “horror stories” about unethical agents, the “fine balance between cooperation and competition” (per one official interviewed) may preclude this from happening as often as it could or should.

Expanding opportunities for educational administrators to share experiences would help to identify emerging best practices and encourage their adoption elsewhere. International students themselves can provide invaluable insight into the agent phenomenon. Even institutions that do not hire and use agents routinely enrol students who have done so. It is in their mutual interest to better understand the role that agents played in getting them there. Routine surveying of currently enrolled international students may help administrators manage agents more adroitly, identify problems in the admissions pipeline (e.g., unscrupulous agents), and further refine recruitment protocols.

Governments, institutions, and professional associations all have a role in promoting best practices, insisting on transparency and adherence to a common code of conduct, and excluding bad actors from further involvement and access. Regulatory frameworks that insist on the highest standards of management, care, and ethical practice from both institutions and agents and hold them accountable for non-compliance provide a powerful statement of Canadian

values and demonstrate a commitment to fair treatment, quality, and value to prospective students and their parents.

Several promising areas for future study surfaced in the course of preparing this report. Additional insight is needed into the experiences of international students who use agents in the pursuit of postsecondary educational opportunities in Canada. Specifically:

- *how students and families assess agent trustworthiness* – existing research suggests that students and parents do not entirely trust that the agents they hire are the honest brokers they purport to be, even as they rely on them for assistance;
- *what factors prompt student and family decisions to hire an agent* – while research suggests that cultural preferences may make agent use desirable, there may be an additional role for institutions to play in providing oversight along with resources and support to students and families in the admissions process;
- *the kinds and sources of information students find credible and useful in making choices* – agents are one of many information sources available to students. Better understanding of how students and families evaluate and use these sources could help educational administrators develop information and marketing materials that prospective students find both useful and credible;
- *how educational (e.g., earning a degree) versus non-educational (e.g., interest in migrating) objectives influence student and family choice-making* – students navigating the admissions process may be influenced by different factors depending on their long-term objectives. Better understanding of how this informs student choices may assist educational administrators and policy-makers.

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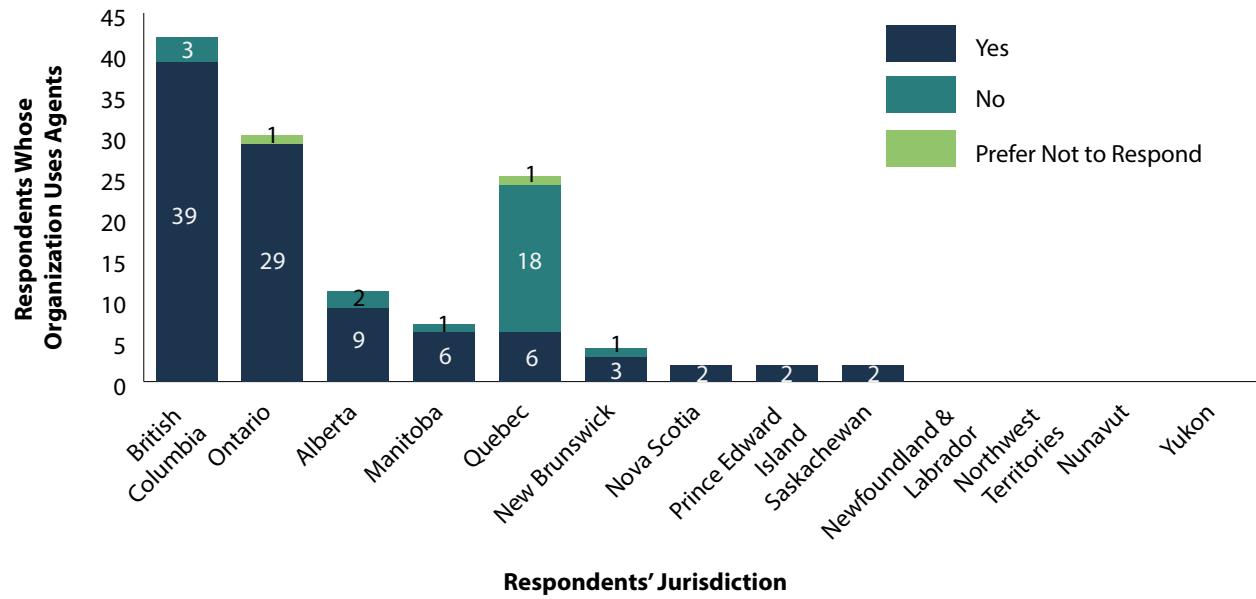
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Appendix A

AGENT USE BY JURISDICTION

Agent Use by Jurisdiction (*n* = 125)



Appendix B

STUDY: THE ROLE OF AGENTS IN CANADA'S EDUCATION SYSTEMS

The purpose of this research project is to better understand the use of education agents ("agents") in Canada's education systems. This research project is sponsored by the Council of Ministers of Education, Canada (CMEC), and is being conducted by Robert Coffey and Leanne Perry at Michigan State University (USA).

For the purpose of this study, an agent refers to an individual or a commercial agency that provides education advising services to students and their families in exchange for a fee (paid by students and their families) and/or commission (paid by an educational institution they represent).

You are invited to participate in this research project because you are affiliated with an educational institution (e.g., school, college, university) or a government agency with responsibility for education.

This research project has been reviewed according to Michigan State's procedures for research involving human subjects. Your participation in this study is voluntary. You may choose not to participate. If you decide to participate in this study, you may withdraw at any time. If you decide not to participate or if you withdraw, you will not be penalized.

The procedure involves completing an on-line survey that will take approximately 10–12 minutes. Your responses will be confidential, and we do not collect identifying information such as your name, e-mail address, or IP address. The survey questions will be about your knowledge of and experience with the use of agents in international student recruitment activities. You may skip any question you would prefer not to answer.

We will do our best to keep your information confidential. All data are stored in a password-protected electronic format. To help protect your confidentiality, the surveys will not contain information that will personally identify you. When reported, the data will be aggregated so that no one can guess at or identify the identity of individual respondents.

The results of this study will be used to compile a report that will be delivered to CMEC to inform its work, and for scholarly purposes. Data may also be shared with Robert Coffey's dissertation advisor and/or Michigan State University's Institutional Review Board (IRB).

At the conclusion of this survey, you will be asked to indicate your willingness to participate in a follow-up interview (via Skype or telephone) at a later time. Your participation in a follow-up

interview is voluntary. You may choose not to participate.

If you have any questions about the research study, please contact Robert Coffey at coffeyr1@msu.edu or by phone at (734) 255-9358.

1. ELECTRONIC CONSENT: Please select your choice below. Clicking on the “agree” button below indicates that:

- you have read the above information
- you voluntarily agree to participate
- you are at least 18 years of age
 - Agree (if selected, skip to question 2)
 - Disagree (if selected, skip to disqualification page)

INSTITUTIONAL PROFILE

2. JURISDICTION: In which jurisdiction is your institution or organization located?

- Alberta
- British Columbia
- Manitoba
- New Brunswick
- Newfoundland and Labrador
- Northwest Territories
- Nova Scotia
- Nunavut
- Ontario
- Prince Edward Island
- Quebec
- Saskatchewan
- Yukon
- Prefer not to respond

- Other (please specify)

3. For what type of organization do you work?

- Educational institution (if selected, skip to question 4)
- Government agency (if selected, skip to question 18)

EDUCATIONAL INSTITUTIONS

4. INSTITUTION TYPE: Which of the following best describes your institution?

- Public high school
- Private high school
- Other secondary-level institution
- Language school
- Public college
- Private college
- Public university
- Private university
- Prefer not to respond
- Other (please specify)

5. Does your institution currently use agents as part of its international student recruitment activities?

- Yes (if selected, skip to question 6)
- No (if selected, skip to question 15)
- Prefer not to respond (if selected, skip to survey completion page)

EDUCATIONAL INSTITUTIONS THAT USE AGENTS

6. Does your educational institution work with independent agents, agencies, or both?

- Exclusively independent agents
- Exclusively agencies
- Both independent agents and agencies

- Prefer not to respond
7. Are the agents and/or agencies that represent your educational institution based in Canada, outside Canada, or both?
- Exclusively based in Canada
 - Exclusively based outside Canada
 - Based in and outside Canada
 - Prefer not to respond
8. In what countries do agents recruiting for your institution currently operate? (Check all that apply.)
- Bangladesh
 - China
 - Egypt
 - France
 - Hong Kong
 - India
 - Iran
 - Japan
 - Mexico
 - Morocco
 - Nigeria
 - Pakistan
 - Saudi Arabia
 - South Korea
 - Trinidad & Tobago
 - United Kingdom
 - United States
 - Prefer not to respond

9. In a typical year, approximately how many agents recruit for your institution?
10. In the past five years, has the number of agents that recruit for your institution decreased, increased, or stayed about the same?
- Greatly decreased
 - Stayed about the same
 - Greatly increased
 - Prefer not to respond
11. How familiar are you with the techniques agents use to recruit students to your institution?
- (1) Not familiar
 - (2) –
 - (3) Moderately familiar
 - (4) –
 - (5) Completely familiar
 - (6) Prefer not to respond
12. How familiar are you with the fees agents charge students for their services?
- (1) Not familiar
 - (2) –
 - (3) Moderately familiar
 - (4) –
 - (5) Completely familiar
 - (6) Prefer not to respond
13. How confident are you that the information agents are providing to prospective students is accurate?
- (1) Not confident
 - (2) –
 - (3) Moderately confident
 - (4) –

- (5) Completely confident
- (6) Prefer not to respond

14. How confident are you that agent activities adhere to current applicable laws and policies pertaining to international student recruitment?

- (1) Not confident (if selected, skip to survey completion page)
- (2) – (if selected, skip to survey completion page)
- (3) Moderately confident (if selected, skip to survey completion page)
- (4) – (if selected, skip to survey completion page)
- (5) Completely confident (if selected, skip to survey completion page)
- (6) Don't know (if selected, skip to survey completion page)
- (7) Prefer not to respond (if selected, skip to survey completion page)

PAST EDUCATIONAL INSTITUTION USE OF AGENTS

15. Has your educational institution used agents as part of international student recruitment activities at any time in the past?

- Yes (if selected, skip to question 16)
- No (if selected, skip to question 17)
- Prefer not to respond (if selected, skip to question 17)

FACTORS PROMPTING DECISION TO DISCONTINUE USE OF AGENTS

16. Why did your institution discontinue using agents?

FACTORS PROMPTING DECISION TO REFRAIN FROM USE OF AGENTS

17. Why has your institution chosen not to use agents?

GOVERNMENT INSTITUTIONS

18. At what level of government does your agency operate?

- Provincial or territorial
- Federal
- Prefer not to respond
- Other (please specify)

19. Within your jurisdiction's education system, at what levels do agents operate? Check all that apply.

- Elementary education (Grades 1–6)
- Secondary education (Grades 7–12)
- Postsecondary education
- Unsure/don't know
- Prefer not to respond

20. In the past five years, has the number of agents that recruit for institutions in your jurisdictions decreased, increased, or stayed about the same?

- (1) Greatly decreased
- (2) –
- (3) Stayed about the same
- (4) –
- (5) Greatly increased
- (6) Don't know
- (7) Prefer to respond

21. How confident are you that education institutions are exercising sufficient oversight over their agents?

- (1) Not confident
- (2) –
- (3) Moderately confident
- (4) –
- (5) Completely confident
- (6) Don't know
- (7) Prefer not to respond

22. How confident are you that the information agents are providing to prospective students is accurate?

- (1) Not confident
- (2) –
- (3) Moderately confident
- (4) –
- (5) Completely confident
- (6) Don't know
- (7) Prefer not to respond

23. How confident are you that agent activities adhere to current applicable laws and policies pertaining to international student recruitment?

- (1) Not confident
- (2) –
- (3) Moderately confident
- (4) –
- (5) Completely confident
- (6) Don't know
- (7) Prefer not to respond

SURVEY COMPLETE

Thank you for your participation.

We plan to conduct 45–60 minute interviews over Skype or telephone with a representative sample of survey respondents. Please cut and paste the link below into your browser to register if you are interested and willing to participate.

<http://tinyurl.com/AgentUseInterview>

Appendix C

COUNTRIES IN WHICH AGENTS ARE ACTIVE ON BEHALF OF RESPONDENTS' INSTITUTIONS

Table 1. Countries in which Agents are Active on behalf of Respondents' Institutions					
Country	Number of Respondents Whose Institution Recruits in Country	Country	Number of Respondents Whose Institution Recruits in Country	Country	Number of Respondents Whose Institution Recruits in Country
China	75	Switzerland	9	Jordan	2
South Korea	71	Thailand	9	Mongolia	2
Japan	70	Ecuador	8	Bahamas	1
Mexico	70	Indonesia	7	Burundi	1
Saudi Arabia	51	Chile	6	Czech Republic	1
Hong Kong	49	Kenya	6	Egypt	1
India	49	Latin America	6	Ghana	1
France	33	Peru	6	Guatemala	1
Brazil	30	Canada	5	Kuwait	1
Pakistan	30	Europe	5	Mauritius	1
Nigeria	29	Trinidad & Tobago	5	Middle East	1
UK*	24	Kazakhstan	4	Nepal	1
Russia	21	UAE**	4	North Africa	1
Bangladesh	20	Argentina	3	Philippines	1
Venezuela	18	Asia	3	Poland	1
Taiwan	16	Cameroon	3	Qatar	1
Ukraine	15	Iran	3	Rwanda	1
Germany	14	Jamaica	3	Slovakia	1
Vietnam	14	Tanzania	3	South America	1
Morocco	11	Uganda	3	Uzbekistan	1
United States	11	Albania	2	Zambia	1
Italy	10	Australia	2	No Response***	1

The Role of Education Agents in Canada's Education Systems

Spain	10	Austria	2		
Turkey	10	Columbia	2		
Note: *United Kingdom; ** United Arab Emirates; ***Prefer Not to Respond.					

Appendix D

RESPONSES BY INSTITUTION TYPE: ALBERTA

The following tables display responses based on participants' institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Currently Using Agents	Yes	2	1	3	3	9
	No	0	0	1	1	2
Total		2	1	4	4	11

Type of Agent(s) * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Type of Agent(s)	Both Independent Agents & Agencies	2	1	3	2	8
Total		2	1	3	2	8

Agent Location * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Agent Location	Based In and Outside Canada	2	1	3	2	8
Total		2	1	3	2	8

Agent/Agency Numbers in Use * Institution Type Cross-tabulation					
		Institution Type			Total
		Public High School	Public College	Public University	
Agent/ Agency Numbers in Use	15	1	0	0	1
	20	1	0	0	1
	30	0	1	0	1
	60	0	1	0	1
	75	0	1	1	2
	150	0	0	1	1
Total		2	3	2	7

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Education: Change in Agent Use over Past Five Years	Somewhat Decreased	0	0	1	0	1
	Stayed About the Same	2	1	0	2	5
	Somewhat Increased	0	0	1	0	1
	Greatly Increased	0	0	1	0	1
Total		2	1	3	2	8

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	2	1	0	1	4
	Somewhat Familiar	0	0	3	1	4
Total		2	1	3	2	8

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Education: Familiarity with Agents' Fees to Students	Not Familiar	0	1	0	0	1
	Mostly Unfamiliar	2	0	0	0	2
	Moderately Familiar	0	0	0	1	1
	Somewhat Familiar	0	0	3	1	4
Total		2	1	3	2	8

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Education: Confidence Agents Give Accurate Information to Students	Moderately Confident	0	0	1	1	2
	Somewhat Confident	2	1	2	1	6
Total		2	1	3	2	8

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation						
		Institution Type				Total
		Public High School	Language School	Public College	Public University	
Education: Confidence Agents' Activities Adhere to Laws/ Policies re: International Recruitment	Moderately Confident	1	0	0	0	1
	Somewhat Confident	0	0	3	2	5
	Don't Know	1	0	0	0	1
	Prefer Not to Respond	0	1	0	0	1
Total		2	1	3	2	8

Institutions' Use of Agents in the Past * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Institutions' Use of Agents in the Past	Yes	1	0	1
	No	0	1	1
Total		1	1	2

Appendix E

RESPONSES BY INSTITUTION TYPE: BRITISH COLUMBIA

The following tables display responses based on participants’ institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Currently Using Agents	Yes	17	3	10	7	37
	No	0	0	0	2	2
Total		17	3	10	9	39

Type of Agent(s) * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Type of Agent(s)	Prefer Not to Respond	1	0	0	0	1
	Exclusively Agencies	1	0	1	1	3
	Both Independent Agents & Agencies	12	2	8	5	27
Total		14	2	9	6	31

Agent Location * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Agent Location	Exclusively Based outside Canada	1	0	0	0	1
	Based in and outside Canada	16	2	10	6	34
Total		17	2	10	6	35

Agent/Agency Numbers in Use * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Agent/ Agency Numbers in Use	2	1	0	0	0	1
	3	0	0	0	1	1
	4	0	0	0	1	1
	5	0	0	1	0	1
	8	0	0	2	1	3
	20	0	1	0	0	1
	25	1	0	0	0	1
	30	1	1	0	0	2
	40	0	0	3	0	3
	45	1	0	0	1	2
	50	1	0	2	1	4
	60	1	0	0	0	1
	100	3	0	2	0	5
	125	1	0	0	0	1
	150	1	0	0	0	1
	200	0	0	0	1	1
	300	2	0	0	0	2
1,000	1	0	0	0	1	
Total		14	2	10	6	32

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public Univeristy	
Education: Change in Agent Use over Past Five Years	Stayed About the Same	7	1	8	6	22
	Somewhat Increased	7	0	2	0	9
	Greatly Increased	2	1	0	0	3
Total		16	2	10	6	34

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	5	0	4	0	9
	Somewhat Familiar	3	0	2	4	9
	Completely Familiar	9	2	4	2	17
Total		17	2	10	6	35

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Education: Familiarity with Agents' Fees to Students	Not Familiar	0	0	3	1	4
	Mostly Unfamiliar	1	0	1	0	2
	Moderately Familiar	8	2	2	2	14
	Somewhat Familiar	3	0	1	2	6
	Completely Familiar	5	0	3	1	9
Total		17	2	10	6	35

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Education: Confidence Agents Give Accurate Information to Students	Not Confident	0	0	1	0	1
	Slightly Confident	2	1	2	0	5
	Moderately Confident	5	1	4	6	16
	Somewhat Confident	4	0	2	0	6
	Completely Confident	6	0	1	0	7
Total		17	2	10	6	35

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Public College	Private College	Public University	
Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment	Not Confident	0	0	2	0	2
	Slightly Confident	0	0	1	0	1
	Moderately Confident	6	2	4	3	15
	Somewhat Confident	5	0	3	3	11
	Completely Confident	6	0	0	0	6
Total		17	2	10	6	35

Institutions' Use of Agents in the Past * Institution Type Cross-tabulation				
		Institution Type		Total
		Public University		
Institutions' Use of Agents in the Past	Yes	2		2
Total		2		2

Appendix F

RESPONSES BY INSTITUTION TYPE: MANITOBA

The following tables display responses based on participants’ institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation						
		Institution Type				Total
		Language School	Private College	Public University	Private University	
Currently Using Agents	Yes	1	1	4	0	6
	No	0	0	0	1	1
Total		1	1	4	1	7

Type of Agent(s) * Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Type of Agent(s)	Exclusively Agencies	0	1	0	1
	Both Independent Agents & Agencies	1	0	2	3
Total		1	1	2	4

Agent Location * Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Agent Location	Based in and outside Canada	1	1	4	6
Total		1	1	4	6

Agent/Agency Numbers in Use * Institution Type Cross-tabulation					
		Institution Type		Total	
		Language School	Public University		
Agent/Agency Numbers in Use	15	0	1	1	
	30	1	1	2	
	41,404	0	1	1	
Total		1	3	4	

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Education: Change in Agent Use over Past Five Years	Somewhat Decreased	0	1	1	2
	Stayed About the Same	1	0	0	1
	Somewhat Increased	0	0	3	3
Total		1	1	4	6

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	0	0	1	1
	Somewhat Familiar	0	1	2	3
	Completely Familiar	1	0	1	2
Total		1	1	4	6

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Education: Familiarity with Agents' Fees to Students	Not Familiar	0	1	0	1
	Mostly Unfamiliar	0	0	1	1
	Moderately Familiar	0	0	1	1
	Somewhat Familiar	0	0	1	1
	Completely Familiar	1	0	1	2
Total		1	1	4	6

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Education: Confidence Agents Give Accurate Information to Students	Moderately Confident	0	0	1	1
	Somewhat Confident	1	1	2	4
	Completely Confident	0	0	1	1
Total		1	1	4	6

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation					
		Institution Type			Total
		Language School	Private College	Public University	
Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment	Somewhat Confident	1	1	4	6
Total		1	1	4	6

Institutions' Use of Agents in the Past * Institution Type Cross-tabulation			
		Institution Type	
		Private University	Total
Institutions' Use of Agents in the Past	No	1	1
Total		1	1

Appendix G

RESPONSES BY INSTITUTION TYPE: NEW BRUNSWICK

The following tables display responses based on participants' institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Currently Using Agents	Yes	1	2	3
	No	0	1	1
Total		1	3	4

Type of Agent(s) * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Type of Agent(s)	Both Independent Agents & Agencies	1	2	3
Total		1	2	3

Agent Location * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Agent Location	Based in and outside Canada	1	2	3
Total		1	2	3

Agent/Agency Numbers in Use * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Agent/Agency Numbers in Use	3	0	1	1
	10	1	1	2
Total		1	2	3

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Education: Change in Agent Use over Past Five Years	Somewhat Decreased	0	1	1
	Somewhat Increased	1	0	1
	Greatly Increased	0	1	1
Total		1	2	3

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	1	0	1
	Somewhat Familiar	0	1	1
	Completely Familiar	0	1	1
Total		1	2	3

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Education: Familiarity with Agents' Fees to Students	Mostly Unfamiliar	1	0	1
	Somewhat Familiar	0	1	1
	Completely Familiar	0	1	1
Total		1	2	3

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Education: Confidence Agents Give Accurate Information to Students	Moderately Confident	1	0	1
	Somewhat Confident	0	1	1
	Completely Confident	0	1	1
Total		1	2	3

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation				
		Institution Type		Total
		Public High School	Public University	
Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment	Somewhat Confident	1	1	2
	Completely Confident	0	1	1
Total		1	2	3

Institutions' Use of Agents in the Past * Institution Type Cross-tabulation			
		Institution Type	Total
		Public University	
Institutions' Use of Agents in the Past	Prefer Not to Respond	1	1
Total		1	1

Appendix H

RESPONSES BY INSTITUTION TYPE: ONTARIO

The following tables display responses based on participants’ institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Currently Using Agents	Yes	2	11	13	3	29
	Prefer Not to Respond	0	0	0	1	1
Total		2	11	13	4	30

Type of Agent(s) * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Type of Agent(s)	Prefer Not to Respond	1	0	0	0	1
	Both Independent Agents & Agencies	1	8	11	2	22
Total		2	8	11	2	23

Agent Location * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Agent Location	Based in and outside Canada	2	10	12	2	26
Total		2	10	12	2	26

Agent/Agency Numbers in Use * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Agent/Agency Numbers in Use	2	0	0	1	0	1
	20	0	0	1	0	1
	48	0	0	0	1	1
	50	1	0	1	0	2
	80	0	0	1	0	1
	100	0	3	3	1	7
	150	0	2	1	0	3
	200	0	0	2	0	2
	250	0	3	2	0	5
	900	0	1	0	0	1
1,700	0	1	0	0	1	
Total		1	10	12	2	25

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Education: Change in Agent Use over Past Five Years	Greatly Decreased	0	0	1	0	1
	Somewhat Decreased	0	1	1	0	2
	Stayed About the Same	0	3	3	1	7
	Somewhat Increased	0	4	2	0	6
	Greatly Increased	0	2	4	1	7
	Prefer Not to Respond	1	0	1	0	2
Total		1	10	12	2	25

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	1	4	1	0	6
	Somewhat Familiar	0	2	5	1	8
	Completely Familiar	0	4	6	1	11
Total		1	10	12	2	25

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Education: Familiarity with Agents' Fees to Students	Not Familiar	1	2	0	0	3
	Moderately Familiar	0	5	5	1	11
	Somewhat Familiar	0	1	3	0	4
	Completely Familiar	0	2	4	1	7
Total		1	10	12	2	25

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Education: Confidence Agents Give Accurate Information to Students	Slightly Confident	0	1	0	0	1
	Moderately Confident	1	4	5	1	11
	Somewhat Confident	0	3	5	1	9
	Completely Confident	0	2	2	0	4
Total		1	10	12	2	25

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation						
		Institution Type				Total
		Private High School	Language School	Public College	Public University	
Education: Confidence Agents' Activities Adhere to Laws/ Policies re: International Recruitment	Not Confident	0	1	0	0	1
	Slightly Confident	0	0	1	0	1
	Moderately Confident	0	2	4	1	7
	Somewhat Confident	0	4	3	1	8
	Completely Confident	0	2	3	0	5
	Don't Know	1	1	0	0	2
	Prefer Not to Respond	0	0	1	0	1
Total		1	10	12	2	25

Institutions' Use of Agents in the Past * Institution Type Cross-tabulation			
		Institution Type	Total
		Public University	
Institutions' Use of Agents in the Past	Yes	1	1
Total		1	1

Appendix I

RESPONSES BY INSTITUTION TYPE: QUEBEC

The following tables display responses based on participants' institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation							
		Institution Type					Total
		Other Secondary-Level Institution	Language School	Public College	Private College	Public University	
Currently Using Agents	Yes	1	1	0	1	3	6
	No	0	0	8	0	9	17
	Prefer Not to Respond	0	0	1	0	0	1
Total		1	1	9	1	12	24

Type of Agent(s) * Institution Type Cross-tabulation					
		Institution Type			Total
		Other Secondary-Level Institution	Language School	Public University	
Type of Agent(s)	Exclusively Agencies	1	0	0	1
	Both Independent Agents & Agencies	0	1	1	2
Total		1	1	1	3

Agent Location * Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Agent Location	Exclusively Based in Canada	1	1	0	1	3
	Based in and outside Canada	0	0	1	0	1
Total		1	1	1	1	4

Agent/Agency Numbers in Use * Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Agent/Agency Numbers in Use	2	1	0	0	0	1
	4	0	0	0	1	1
	6	0	0	0	1	1
	50	0	0	1	0	1
	100	0	1	0	0	1
Total		1	1	1	2	5

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Education: Change in Agent Use over Past Five Years	Stayed About the Same	1	0	0	1	2
	Greatly Increased	0	1	1	1	3
Total		1	1	1	2	5

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	1	0	0	1	2
	Somewhat Familiar	0	0	1	0	1
	Completely Familiar	0	1	0	1	2
Total		1	1	1	2	5

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Education: Familiarity with Agents' Fees to Students	Moderately Familiar	0	1	1	1	3
	Somewhat Familiar	1	0	0	0	1
Total		1	1	1	1	4

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Education: Confidence Agents Give Accurate Information to Students	Not Confident	0	0	0	1	1
	Moderately Confident	0	1	1	0	2
	Somewhat Confident	0	0	0	1	1
	Completely Confident	1	0	0	0	1
Total		1	1	1	2	5

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation						
		Institution Type				Total
		Other Secondary-Level Institution	Language School	Private College	Public University	
Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment	Moderately Confident	0	1	1	1	3
	Completely Confident	1	0	0	0	1
	Don't Know	0	0	0	1	1
Total		1	1	1	2	5

Institutions' Use of Agents in the Past * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Institutions' Use of Agents in the Past	Yes	1	1	2
	No	7	7	14
	Prefer Not to Respond	0	1	1
Total		8	9	17

Appendix J

RESPONSES BY INSTITUTION TYPE: SASKATCHEWAN

The following tables display responses based on participants' institution type. Across participating jurisdictions, some of the questions had such low response rates that displaying data in column charts would not have been helpful. As such, cross-tabulation tables have been provided.

How to Read a Cross-tab Table

Each table is titled in the format <variable name> * Institution Type (e.g., currently using agents * institution type). Institution types are always listed across the top (i.e., column headings) and the response options for each variable are listed along the side (i.e., row headings). Where each column and row intersect, you will see a number representing the number of participants who chose that response option.

Currently Using Agents * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Currently Using Agents	Yes	1	1	2
Total		1	1	2

Type of Agent(s) * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Type of Agent(s)	Both Independent Agents & Agencies	1	1	2
Total		1	1	2

Agent Location * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Agent Location	Based in and outside Canada	1	1	2
Total		1	1	2

Agent/Agency Numbers in Use * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Agent/Agency Numbers in Use	15	1	0	1
	45	0	1	1
Total		1	1	2

Education: Change in Agent Use over Past Five Years* Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Education: Change in Agent Use over Past Five Years	Somewhat Decreased	0	1	1
	Greatly Increased	1	0	1
Total		1	1	2

Education: Familiarity with Agents' Techniques * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Education: Familiarity with Agents' Techniques	Moderately Familiar	0	1	1
	Somewhat Familiar	1	0	1
Total		1	1	2

Education: Familiarity with Agents' Fees to Students * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Education: Familiarity with Agents' Fees to Students	Mostly Unfamiliar	0	1	1
	Somewhat Familiar	1	0	1
Total		1	1	2

Education: Confidence Agents Give Accurate Information to Students * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Education: Confidence Agents Give Accurate Information to Students	Moderately Confident	0	1	1
	Somewhat Confident	1	0	1
Total		1	1	2

Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment * Institution Type Cross-tabulation				
		Institution Type		Total
		Public College	Public University	
Education: Confidence Agents' Activities Adhere to Laws/Policies re: International Recruitment	Moderately Confident	0	1	1
	Somewhat Confident	1	0	1
Total		1	1	2

