Agent Rules Are Unclear to Students

Part 5 of the Trust Through Information series

World Education Services

Acknowledgements

WES is grateful to those individuals who took time to speak with us about the information ecosystem, provide examples of good practices, or participate in a findings validation session. This report was strengthened due to their contributions and insights.

This project was a collaborative effort. The WES project team included:

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Suggested citation: World Education Services. (2026). *Trust Through Information: Strengthening Canada's International Student Information Ecosystem.* https://knowledge.wes.org/canada-report-international-students-information-ecosystem.html

Lack of Information about Working with an Intermediary Enables Unscrupulous Actors

Introduction

This paper is part of a research series designed to support cross-sector dialogue on strengthening integrity and accountability in the ecosystem of information provided to international students.

The research reveals critical shortcomings in the information that reaches international students. Official sources, defined as government (federal, provincial, and territorial) and post-secondary institutions (PSIs), provide inadequate guidance, leaving students reliant on intermediaries (people or organizations that provide education services in exchange for payment) and content creators. Artificial intelligence technologies draw from vast bodies of outdated or inaccurate information. These dynamics enable widespread circulation of misinformation, creating a damaging gap between what students expect, what they experience in Canada, and what policymakers intend. The consequences include harm to international students, erosion of global trust in Canada's post-secondary education sector, and reduced policy effectiveness.

The series consists of an introductory paper, *Trust Through Information*, that summarizes all the challenges our research uncovered, followed by individual reports that go into depth on each one.

Each paper in the series elaborates on a single systemic challenge WES has identified, presenting the current state, desired outcomes, accountability mechanisms, and examples of good practice.

To read the full series, please visit the **WES website**.

International students need practical guidance on working with an intermediary

Intermediaries such as education agents have substantial influence over international students and the information ecosystem. In recent focus groups with international students, WES found that intermediaries play an important role as personal contacts who distill information and options in a clear, accessible way.[1] Studies from 2021 suggest that about half of all international students intending to study in Canada engaged the services of an education agent.[2]

1 https://knowledge.wes.org/canada-report-insights-from-international-students-in-canada.html
2 https://universityaffairs.ca/features/the-murky-world-of-unregulated-international-student-recruiters/; https://ojs.lib.uwo.ca/index.php/cie-eci/article/view/14132

What is an intermediary?

An intermediary is any person who provides education or immigration advice to international students in exchange for payment, whether that payment comes from the student or a post-secondary institution (PSI). Recruiters, education agents, subcontracted agents, licensed immigration consultants, and unauthorized immigration practitioners are all considered intermediaries. This broad definition captures the reality that many people involved in higher education recruitment offer a mix of education, visa, immigration, and relocation services.

Yet even as intermediaries play an influential role in shaping international students' perceptions and decisions, IRCC and post-secondary institutions provide inadequate guidance on how to identify trustworthy agents and avoid exploitation.[3] Red flags related to working with an intermediary may not be intuitive to prospective international students, who may not realize that they should actively seek guidance on how to avoid common problems. This makes it critical for official sources to prominently display information and advice on how to work with an intermediary.

These gaps leave international students at risk of being uninformed about:

- The relationship between an intermediary and a PSI
- What services an intermediary is allowed to offer
- Warning signs of an unscrupulous intermediary

As a result, misinformation and unauthorized activity have flourished,[4] further weakening the information ecosystem and undermining the reputation and integrity of Canada's world-renowned higher education sector.

Key challenges that international students face:

- **Intermediaries may provide misinformation to international students.** Many intermediaries make false claims to attract prospective students or to increase commissions. Our ecosystem mapping exercise identified numerous examples of outdated, misleading, and false information on intermediary websites. (See examples below.)
- **Intermediaries may prioritize commissions over students' interests.** In some cases, intermediaries steer international students towards a particular course

3 https://www.theglobeandmail.com/politics/article-ottawa-accused-of-failing-to-crack-down-on-unethical-immigration

4 https://www.canada.ca/en/immigration-refugees-citizenship/corporate/transparency/committees/cimm-oct-24-2023/task-force-students-fraud.html; https://universityaffairs.ca/features/the-murky-world-of-unregulated-international-student-recruiters

or institution because it offers a lucrative referral fee, not because it serves the students' best interests.

- **Some intermediaries offer services without authorization.** Prospective international students living abroad may not know that education agents, including those working outside of Canada, are not authorized to receive payment for immigration advice and representation unless they are licensed and registered in Canada.[5] Agents without the proper licence are not authorized to complete study permit and other immigration applications. Despite this, many intermediary websites in our study offered immigration services alongside education advising.
- **Official guidance on working with intermediaries is buried or absent.** Less than half of the PSIs in our study provided any information or guidance on working with an intermediary. Only two of the eight PSIs included in the ecosystem mapping exercise published lists of contracted agents. Government websites also fail to make guidance easily accessible. There is no link from webpages with broad information for international students—such as the international student homepage, the "Plan Your Studies" page, or the "Study Permits and Visas" page—to the EduCanada webpage on agents. Similarly, the IRCC webpage "International students: Know the rules before you apply to study in Canada" can only be reached through a webpage titled "Immigration and citizenship fraud and scams," with no link to or from IRCC's international student section of the website.

5 To provide these services, an individual must be a member in good standing of a law society of a province (lawyers and paralegals), the Chambre des notaires du Québec, or the College of Immigration and Citizenship Consultants (CICC).

Recommendations for Discussion

Information about working with intermediaries can reduce the frequency and harms of misinformation and unscrupulous representation, improving the international student experience. A stronger information ecosystem requires both improved transparency about intermediary relationships and better access to guidance for international students.

We offer these proposed outcomes and actions as a starting place for cross-sectoral conversation:

Proposed Outcomes

- Prospective international students who need help with their study permit applications engage the services of a provider who is licensed in Canada and authorized to provide that service.
- Prospective international students are aware of red flags that signal an intermediary who is not acting in their best interests.
- International students are able to easily find out which PSIs have contracts with or pay commissions to a particular intermediary.
- International students report declining instances of being deceived or misinformed by intermediaries.

Proposed Actions

- Federal government websites make intermediary guidance easily accessible by linking to it from all international student-facing pages.
- Federal government and institutional websites clearly state what services intermediaries are legally authorized to provide.
- PSIs publish and maintain lists of contracted agents and recruiters.
- PSIs prominently display guidance on working with intermediaries, including red flags and questions to ask.
- PSIs state clearly that students are not required to engage the services of an agent to apply for admission.
- PSIs monitor recruitment activities of contracted agents to ensure that they act in students' best interests.

Proposed Accountability Mechanisms

- Requirement that education agents be registered and licensed.
- Requirement that the federal and provincial government provide accessible, easy-to-find guidance on working with intermediaries on all official websites aimed at international students.
- Requirement that PSIs maintain and publish lists of contracted agents and recruiters.
- Requirement that PSIs monitor recruitment activities and take reasonable steps to ensure that agents put students' interests first.
- International students are regularly surveyed for feedback on intermediaries who assisted them pre-arrival.

Examples of Good Practice in Safeguarding International Students Against Abuse by Intermediaries

Regulatory requirements

Manitoba's International Education Act (IEA) includes several requirements that can advance the proposed outcomes:[6]

- PSIs must publish and maintain a list of recruiters and recruitment agencies.
- PSIs must state that it is not necessary for the student to engage the services of a recruiter in order to apply for admission to a program.
- A designated education provider must monitor the recruitment activities of each of its recruiters on an ongoing basis and take reasonable steps to ensure that each of its recruiters acts in furtherance of the interests of prospective international students.

Student guidance resources

Examples of effective student guidance include checklists for selecting an intermediary, suggested questions to ask, and red flags to watch for. These resources help international students make informed decisions about whether and how to work with an intermediary, such as an education agent or immigration agent.

6 https://www.edu.gov.mb.ca/ie/pdf/code_of_practice.pdf

Guides and checklists for working with intermediaries:

Figure 1

On this page:

What an agent can do for you

- An agent can give you information about various schools and programs that will suit your academic goals.
- An agent can guide you through the application process (i.e. where to set up an account, where to find information, key deadlines, etc.).
- An agent can assist you with applying for your visa and study permit (if they are certified by **ICCRC**).
- An agent can assist you with transportation.
- An agent can give you information and tips on living and studying in Vancouver, Kelowna, and Canada.
- An agent can give you information on study costs and any available funding or scholarships.

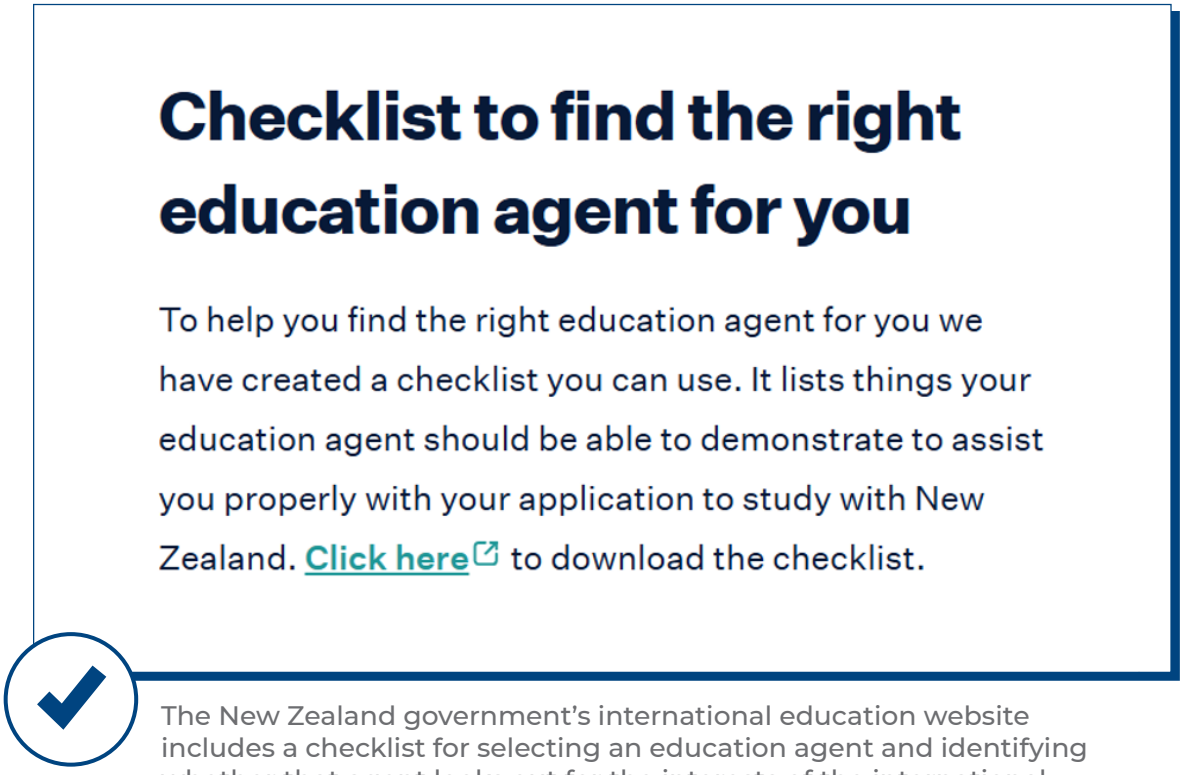
What an agent cannot do for you

- Working with an agent does not increase your chances of admission or of obtaining a scholarship at [redacted]. All students are assessed on the merit of their grades and overall application.
- An agent cannot write or assist in writing your personal profile or any part of your application.
- An agent cannot submit false records or documents.
- An agent cannot access your [redacted] records without your consent. You must complete a Third-Party Authorization for your agent to have access to your [redacted] information in the **Applicant Service Centre**.
- An agent cannot submit payments for any UBC-related fees on your behalf.

A PSI provides information about key topics that are important for international students considering working with an agent.

Guides and checklists:

Figure 2



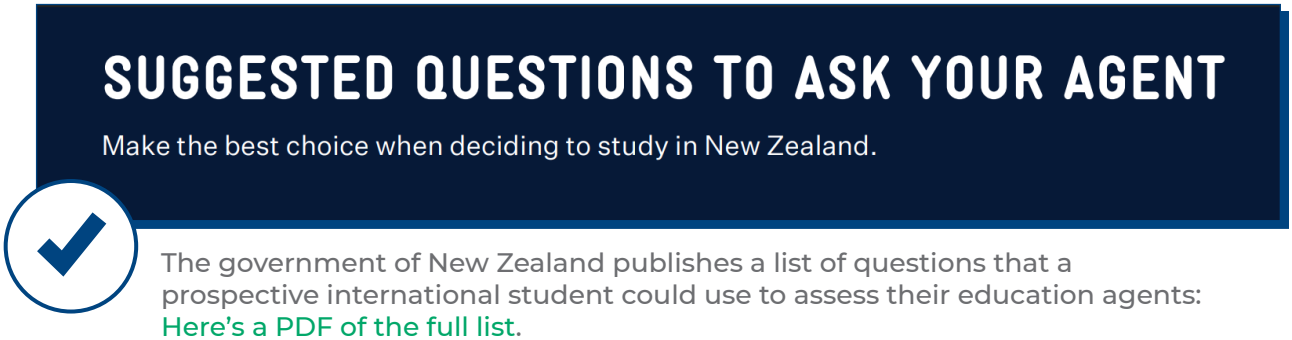
The New Zealand government's international education website includes a checklist for selecting an education agent and identifying whether that agent looks out for the interests of the international student. For access to the full checklist, visit this website.

The British Council publishes what education agents should help with and considerations for identifying a good education agent, including a link to a database of licensed individuals.[7]

7 https://study-uk.shorthandstories.com/study-uk-a-student-guide-to-choosing-an-education-agent/index.html

Questions to ask an intermediary:

Figure 3



The government of New Zealand publishes a list of questions that a prospective international student could use to assess their education agents: Here's a PDF of the full list.

Red flags when working with an intermediary:

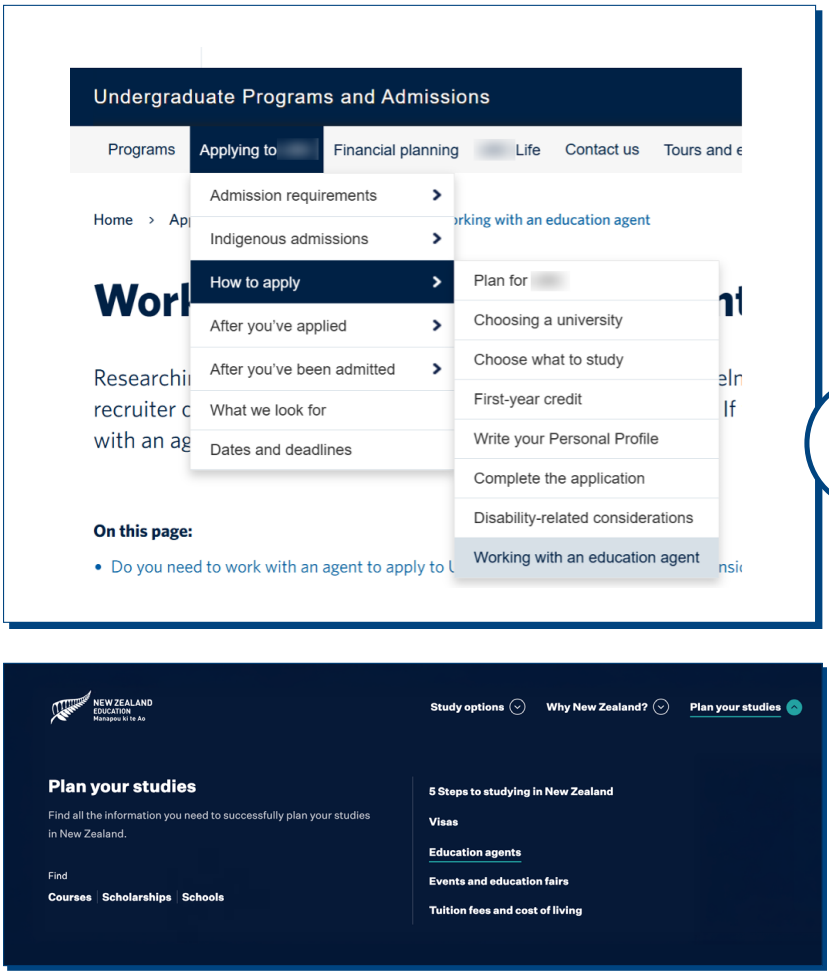
Figure 4

Example of content about identifying red flags when working with a legal representative. For the full text, see the blog post.

Prominent placement of intermediary guidance

Guidance on working with intermediaries is most effective when prominently displayed alongside other practical information that students need early in their decision-making process.

Figure 5

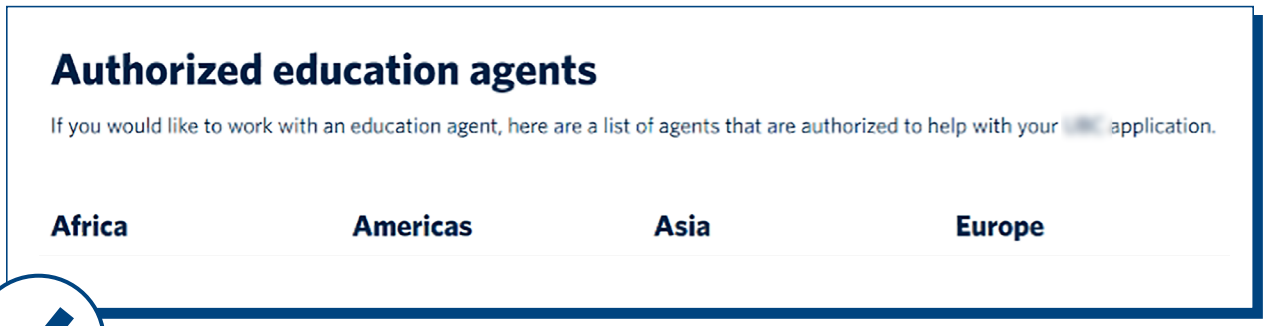


Two examples of websites for international students that make it easy to navigate to information about working with an education agent. One example is a Canadian PSI, the other comes from a country's international education website.

Listing contracted agents on PSI websites

Published lists of contracted agents help students verify which intermediaries have official relationships with institutions. According to the British Council's *Good Practice Guide for Providers Using Education Agents,* publishing lists of contracted intermediaries is a simple and low-cost best practice. The guide suggests including the locations (virtual, physical, or both) of offices and listing education agents by country and city to help students find support near them.[8]

Figure 6



Example of a PSI that lists agents who are authorized to assist with applications to that school.

Student feedback on intermediaries

Collecting and using student feedback helps institutions monitor intermediary conduct and identify problematic practices. The British Council's *Good Practice Guid*e suggests collecting student feedback on education agents in a new student survey and offers possible questions to include. The guide also recommends that PSIs cooperate to agree on a set of questions to help benchmark results.

8 https://www.britishcouncil.org/sites/default/files/good-practice-guide-for-uk-providers-using-education-agents.pdf

Figure 7

Question	Answer	Insights (used for annual review & national benchmarking)
Did you use an education agent to help you gain admission to [PROVIDER NAME]?	YES > next question NO > skip to next area of questionnaire	Percentage of students using an education agent
What was the education agent's company name and office location	Dropdown list of contracted agents. Free text box for uncontracted agents.	Confirming it is a contracted education agent – also good for insight on potential education agents
To what extent do you believe that your education agent accurately represented [PROVIDER NAME]?	5 Very accurately to 1 Very inaccurately	Indicators for further action: 4/5: Recognition/reward 2/3: Investigation leading to training 1/2: Investigation leading to possible dismissal
Would you recommend your education agent to other potential students wanting to study at [PROVIDER NAME]?	5 Yes, recommend to 1 No, discourage	Student satisfaction rating metric – useful in national benchmarking
How would you rate the quality of your experience of using your education agent?	5 Excellent to 1 Poor	Student satisfaction rating metric

Example of questions that could be included to get international student feedback on contracted agents.

Figure 8

Fictional Agent annual review scorecard

Criteria		Target	Actual	Rating	Score	Total
Recruitment & marketing *Weighting 40%*	Enrolment target	80	76	Below expectation	1	11
	Conversion rate (app to offer)	85%	88%	Exceeded expectation	3	
	Conversion rate (app to enrol)	25%	22%	Below expectation	1	
	'Priority programme' enrolments	11	16	Exceeded expectation	3	
	Cost per enrolment (marketing and commission)	<£2,000	£1,760	Exceeded expectation	3	
Quality *Weighting 20%*	Complete applications	95%	95%	Met expectation	2	4
	Visa success	95%	92%	Below expectation	1	
	CAS cancellations (after CAS being issued)	<2%	5%	Below expectation	1	
Student experience *Weighting 20%*	New-student survey feedback	★★★★☆ 4	★★★★☆ 4.1	Exceeded expectation	3	12
	Change of agent requests	<2%	0%	Exceeded expectation	3	
	Student complaints	<2%	1%	Exceeded expectation	3	
	Student propensity to recommend agent	85%	88%	Exceeded expectation	3	
Engagement *Weighting 10%*	Business intel, feedback, responsiveness	Average	Average	Met expectation	2	8
	Training participation	>15 staff	21 staff	Exceeded expectation	3	
	Value-add service	None	Travel booking	Exceeded expectation	3	
Risk *Weighting 10%*	National Code Audit (See Section 2: 'Compliance with the National Code' of this chapter)	Compliant	Somewhat Compliant – old logo use	Below expectation	1	3
	Warnings	0	0	Met expectation	2	
Weighted Score TARGET		**7.0**		**Weighted Score ACTUAL**		**8.7**

Example of an education agent scorecard, including student feedback on an agent, that can be used in annual review of agent performance. This example comes from the British Council's "Good Practice Guide for Providers Using Education Agents"[9]

9 https://www.britishcouncil.org/sites/default/files/good-practice-guide-for-uk-providers-using-education-agents.pdf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