

A Comparative Analysis of the K-12 International Education Policies of Ontario and Manitoba

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Abstract

Through the lens of critical policy analysis, this paper examines the context of K-12 international education in two Canadian provinces. Both Ontario and Manitoba have seen the fastest growth in Canada when it comes to international students, yet those provinces represent distinctly different contexts. In this paper, we examine how international education has been approached as policy at the K-12 level in both provinces. Empirical data was collected through document analysis and stakeholder interviews. By using Ball's (1994) framework of three policy contexts— (a) the context of influence, (b) the context of policy text production, and (c) the context of practice—this paper reveals that policy is not simply a government directive but rather a complex and contradictory process involving practitioners from schools, school boards, and non-government organizations involving educational administrators. Therefore, to effect change, policy needs to be understood through the perspective of multiple stakeholders. The paper cautions all stakeholders to be more critical of international education as policy, given that in its present form it privileges values that undermine the very foundations of a free equity based publicly funded K-12 educational system in Canada.

Keywords: international education, K-12 international education, K-12 international students, international student recruitment

Introduction

Several provincial governments in Canada have announced international education policies, including Ontario in 2015 (see Government of Ontario, 2015) and Manitoba in 2008, 2015, and 2016 (see Government of Manitoba, 2008, 2015, 2016). With this policy focus, special attention has been given to K-12 public schools and their internationalization efforts. Scholars have observed an increased tendency in Canada towards the marketization and commodification of public education through internationalization (Fallon & Poole, 2014; Johnstone & Lee, 2017). Government policies play a foundational role in setting the direction for international education activities across local contexts. However, are policies simply government directives, as suggested by scholars of the rational tradition in policy studies? Do policy directives of the government get accepted and implemented as intended? In this paper, we take a more critical approach to the concept of policy, viewing policy as more than simple texts. We see policy as a process that includes values, interests, discourses, power dynamics, influences, outcomes, and effects (Ball, 1993, 1994, 2015; Ozga, 2000) that all interact in complex ways to change intent, effect, and outcomes of policy. Implementing Ball's (1994) framework of three policy contexts — (a) the context of influence, (b) the context of policy text production, and (c) the context of practice —this paper provides a comparative analysis of the international education policies of Ontario and Manitoba. Our research objective is to examine the relationship between policy and practice in K-12 international education through this comparison. In particular, our research asks the following questions: *How is international education approached as policy at the K-12 educational level? What contextual factors have led to its impetus?*

How has international education policy been constructed and practiced by different stakeholders? What has been or is likely to be the impact of international education policy on public school systems in Canada? By critically approaching policy as process, this paper adds important empirical evidence to the study of the powerful emergence of international education in the K-12 sector in Canada. The paper is significant in illustrating how the uptake of neoliberalism has propelled policy actors such as schools and school boards to challenge the established norms and values of public schooling in Canada ahead of formal government policies on international education. This paper speaks to the serious implications of in(equity) producing winners and losers as international education activities evolve and eventually (re) shape the nature of the public school systems.

Review of Literature: International Education and the K-12 Sector

While international education, by way of recruitment, study abroad initiatives, institutional partnerships, and other activities, has been a core pursuit of the Canadian higher educational sector, it is increasingly gaining momentum at the K-12 educational level. The number of international students studying in Canada's secondary schools or lower is still relatively small in scale —71,350 students in 2017 (15% of the total) —yet this number has increased by 1.27 times since 2015 (Canadian Bureau of International Education [CBIE], 2017). International student mobility at the K-12 level is not a new phenomenon in Canada. Canadian public schools have been operating international student programs since the 1980s (Canadian Association of Public Schools-International [CAPS-I], n.d.). British Columbia was the first province to focus on K-12 international education initiatives with the Vancouver School Board establishing a formal “International Education Program” in 1985 (Waters, 2006). What is new is the increasing number of students and, as a result, policies that guide international education.

As the primary governing bodies of education policy, several provincial governments have issued international education strategies. British Columbia, Ontario, and Quebec have distinct K-12 policies while other provinces, such as Alberta and Manitoba, have combined K-12 and post-secondary international education policies. In addition, several provincial governments have signed agreements to offer provincial high school diplomas abroad (e.g., British Columbia, Manitoba, Nova Scotia, New Brunswick, Ontario). Efforts to create pathway programs for graduating international students to enter Canadian post-secondary education have been undertaken in several provinces (McCartney & Metcalfe, 2018; BC Ministry of Education, 2015).

Separate from the Ministries, school boards, active in international education, have come together under the aegis of The Canadian Association of Public Schools — International (CAPS-I). CAPS-I, established in 2007 in Winnipeg by a group of Canadian K-12 public school administrators of international education, is a non-profit association comprised of 128 publicly-funded school districts/boards (CAPS-I, n.d.). All members offer international student programs for various grade levels ranging from elementary school through to high school. CAPS-I also works on advocacy issues with the federal government, for example, the facilitation of student visas for international students. These policy efforts demonstrate a rise in the importance of international education in Canada's K-12 sector.

Academic research on Canadian K-12 international education is limited. Waters (2006) examined how the Vancouver School Board has used private agents in Asia to recruit students, strategically placing them within particular under-subscribed schools in the district and thus maintaining existing education programs for local students and even employing additional school staff. Fallon and Poole (2014) described how market-driven revenue sources, characterized by the commodification of education services, competition among schools and districts, and expanded consumer (i.e., parent and student) choice, have become increasingly evident in K-12 public education in British Columbia. A separate stream of research has suggested that international students from privileged families can gain valuable social and cultural capital through educational experiences in Canada (Bosetti, Van Pelt, & Allison, 2017; Waters, 2006; Yoon, 2011). This phenomenon has resulted in a new wave of global dominant elites that is emerging with the help of Canadian public schools. Overall, there is concern about how international education programs in Canada are associated with the increasing privatization of public education.

Theoretical Framework

In this paper, we apply a critical policy studies framework, in particular the notion of Ball's (1994) pol-

icy contexts: the context of influence, the context of policy text production, and the context of practice. Traditionally, policy studies have been state centered and linear, neglecting the agency of anything other than the state and its institutions. However, Ball, among other scholars (see Ball, 1994; Bowe, Ball, & Gold, 1992), were among the first critical scholars to draw attention to the complexity and contested nature of education policy, focusing on the analysis of policy practices, effects, and consequences at the local level. Ball (1993) has urged tracing “policy formulation, struggle and response from within the state itself through to the various recipients of policy” (p. 16), thus enabling a focus on the role of practitioners across various sites of policy generation and/or implementation. He has made explicit the importance of examining what individuals and groups actually *do* in response to policy because, for him, policy is “both text and action, words and deeds, it is what is enacted as well as what is intended” (Ball, 1994, p. 10). Such a critical approach enabled us to meet our research objectives of examining how K-12 international education policy is approached, constructed, and practiced both from within and outside of the Ministries in Ontario and Manitoba.

As context was equally important to us, we found Bowe, Ball, and Gold’s (1992) argument of understanding the histories and ideologies of the people who receive policy texts and the rationales for implementing policy salient. This approach is another strength of critical policy analysis; it emphasizes the importance of examining policies within their historical, social, economic, cultural, and political contexts (Diem & Young, 2015; Winton, 2016a, 2016b), recognizing that these contexts produce particular “local” versions of policy (Ozga, 2005, p. 207; Taylor, 1997; Vidovich, 2007; Winton, 2013). Lastly, Ball’s (1994) notion of policy as process was appealing precisely because we were interested in examining the link between policy text and practice. As Lall (2007) stated, “[p]olicy authors cannot control the meaning of their texts even if they do try... the policy process doesn’t just begin when the policy is launched and received as a text by the people who have to implement it. The production of the text itself is not one static moment, but a process” (p. 5). Thus, we adopted a critical lens through which we viewed policies as participatory and “struggled over, not delivered” (Ozga, 2000, p. 2). Ball (1994, 1992) and his colleagues have proposed a continuous policy cycle with three contexts to allow for the recontextualization of policy throughout the policy process.

More specifically, the three contexts of the Ball’s policy cycle include:

1. *Context of influence*, where interest groups struggle over the construction of policy discourses and where key policy concepts are established; the influences of interest groups may align or conflict.
2. *Context of policy text production*, where texts represent policies. Texts have to be read in relation to time, the site of production, and other relevant texts, and thus may contain inconsistencies and contradiction. Policy texts codify certain ideas and reflect dominant influences, but they are also formal, official documents that must harmonize with other policies.
3. *Context of practice*, where policy is subject to interpretation and recreation (Bowe, Ball, & Gold, 1992, p. 16). The implementation of the policies is scrutinized by those in the context of influence, generating new policy. The relationships between these contexts are fluid and operate in a variety of directions. For example, educational administrators can be one voice in the context of influence, as well as key agents in the context of practice.

Policy actors use a range of rhetorical strategies in all three policy contexts to persuade others to interpret social practices in a particular way (i.e., as a policy problem) and to respond to the issue in ways that reflect that understanding (Winton, 2013). Critical policy analysis and Ball’s (1994) three contexts of policy as process provided us with a useful framework to examine and compare how, why, and by whom K-12 international education policy has been enacted in Ontario and Manitoba.

Methodology

We adopted a qualitative research methodology (Creswell, 2012) and chose Ontario and Manitoba as case studies for the purpose of in-depth examination of two distinct provincial contexts with international education policies. Ontario, located in east-central Canada, is the country’s most populous province and, in many ways, represents Canada’s “leadership” in international education. Forty-eight percent of all international students (IS) in Canada in 2017 chose Ontario as their study destination (CBIE, 2018). In 2013, Ontario hosted over 126,000 international students, the largest number in Canada, of whom approximately 19,000 were in K–12 schools (Government of Ontario, 2015). Manitoba, a prairie prov-

ince located in central Canada, is substantially smaller than Ontario with only 1.3 million people versus Ontario's 14.2 million (Statistics Canada, 2018), attracted only 16,075 international students (4% of the Canadian total) in 2017 (CBIE, 2018). Yet, the ratio of K-12 international students, compared to the total population, is quite similar (0.13% in Ontario and 0.11% in Manitoba). The contrasts between the two provinces in terms of location, size, and attractiveness make for interesting comparative contexts. In addition, while all regions of Canada have seen growth in the number of international students they are hosting, proportionally Ontario and Manitoba have shown the most year-over-year growth (CBIE, 2018), indicating specific (policy) factors triggering that growth.

Table 1
Provincial Profiles

	Ontario	Manitoba
Geographical location	East-central Canada	Central Canada
Population	14.2 million (37.8% of the Canadian total)	1.3 million (3.5% of the Canadian total)
Number of international students in 2017	233,226 (48% of the Canadian total)	16,075 (4% of the Canadian total)
Number of K-12 international students in 2013	19,000 (0.13% of the total population in the province)	1,431 (0.11% of the total population in the province)
Overall growth in international students, including K-12 students	127%	119%
Average tuition fee in K-12	\$14 000 per year	\$11 000 per year

Source. Based on the analysis of the following resources - CAPS-I, web; CBIE, 2018; Government of Manitoba, 2013; Government of Ontario, 2015; Statistics Canada, 2018.

Our study was conducted in three stages. *First*, we independently reviewed and analyzed each of the provincial strategic documents. For Manitoba, the following three key policy documents were included: the “International Education Act” (Government of Manitoba, 2016); “The Guide to the Code of Practice and Conduct Regulation for Manitoba Designated Education Providers, Their Staff Recruiters and Contracted Agents” (Government of Manitoba, 2015); and the “International Education Strategy of the Province of Manitoba, 2009-2013” (Government of Manitoba, 2008). For Ontario, we began with examining “Ontario’s Strategy for K-12 International Education” (Government of Ontario, 2015) but also reviewed the Education Equity Action Plan (Ministry of Education, 2017a), the Anti-Racism Strategic Plan (Government of Ontario, 2017), the Black Youth Action Plan (Ministry of Children, Community and Social Services, 2017) and Ontario’s Indigenous Education Strategy (Ministry of Education, 2017b), as they were referenced in the International Education Strategy. The *second* stage of our research involved conducting interviews with representatives of provincial Ministries and educational administrators working in school divisions (directors, assistant superintendents, and coordinators of International Student Programs). A total of 12 semi-structured one-hour interviews were conducted in Ontario and Manitoba. In Manitoba, four interviews were conducted with Manitoba government officials and four with Manitoba school administrators. In Ontario, two interviews were conducted with Ministry officials and two with school board administrators. The school administrators in both provinces were selected based on their leadership capacity, their direct involvement in overseeing the International Student Program (ISP) within their schools, and their engagement with provincial international educational organizations. An initial purposeful sampling was followed by a *snowball sampling* technique (Lichtman, 2012) in both provinces to identify participants. Participants were provided with an informed consent form for full disclosure of the project. They were asked to respond to a set of 14 open-ended questions that probed the history, context, and development of their province’s international education strategy (which mainly applied to government officials, although all interviewees were asked the same set of questions), as well as their interpretation and enactment of the strategy in terms of policies, programs, and activities (which mainly

applied to school administrators, although government officials also responded to these questions). Given the small size of our sample and to protect the anonymity and confidentiality of our participants, we have purposefully not stated details about the departments or locations of our interviewees.

The *third* stage of our research involved contextual comparisons and analysis. Following transcription, the interview data were independently read and coded by researchers, who then met to compare their coding. Textual analysis of policy documents and interview transcripts was performed through deductive categorization (Creswell, 2012; Bogdan & Biklen, 2006), whereby the structure of analysis was operationalized on the basis of previous knowledge, directly informed by our theoretical framework. The main categorization matrix, our starting point for data analysis, included the following categories: (a) context of stakeholder influences, (b) context of policy text production, and (c) context of practice (implementation of policies). All data were initially coded corresponding to this three-category matrix. For example, any mention in documents or interviews of stakeholder influence (understood as stakeholder presence, power shifts, or advocacy activities) were collected and grouped together. Then, any mention of definitions of international education, its rationales, components, and general framing techniques were grouped within the context of policy text category. Finally, the context of practice included any mentions of activities or practices related to international education both within and outside of schools. Next, these broad higher-order thematic groups were gradually developed into more specific and nuanced sub-categories (e.g., resistance/alliance in stakeholder perspectives, geographic/political/economic factors influencing international education policy). This approach also allowed us to identify commonalities and differences among and between policy actors within and across the two provinces (Elo & Kyngäs, 2008, Bowen, 2009). Based on the deductive categorization, findings were presented and research questions answered.

Limitations of the Study

This study has several limitations. The study only included a select group of practitioners and excluded teachers, parents, and students, who are equally, if not more, important policy actors when it comes to educational policy. Thus, this study was limited in scope in terms of its understanding of policy enactment and implementation. However, it did allow for a more in-depth, nuanced understanding of the K-12 international education landscape. The study also did not delve into forces of globalization and nationalism that undoubtedly influence international education policies at the provincial and/or local levels. In this sense, it was a micro-level study of local contexts within the K-12 international education policy. This lens was important, as it enabled us to see the role of the government *vis-a-vis* local policy actors, without necessarily eliminating government influence.

Key Findings

In presenting the findings, we will follow Ball's (1994) three policy contexts framework focusing on (a) the context of influence, (b) the context of policy text production, and (c) the context of practice. An overview of these differences is presented in Table 2 at the end of the key findings section.

Context of Influence

Ontario. The Ontario public K-12 sector has a three-level governance system: the central authority (i.e., the Ministry of Education), the intermediate authority (i.e., school boards/districts), and schools (Lessard & Brassard, n.d.). Below is a brief description of the policy actors within this system that this study focused on.

- The Ministry of Education (Ministry) is responsible for government policy, funding, curriculum planning, and direction at all levels of public education along with the Ontario College of Teachers and Faculties of Education. The Ministry has divided Ontario into six districts, each of which has multiple school boards.
- The district school boards (Boards) have judicial status. One of their primary responsibilities is to ensure that all students in their jurisdictions receive the services to which they have a right as per the Ministry's frameworks (Lessard & Brassard, n.d.). Ontario has two publicly funded school systems, Catholic and Public, with schools divided almost equally between these two systems; 63 are English speaking and 12 are French speaking (Ministry of Educa-

tion, 2017a). As per 2017-2018, Ontario had a total of 72 boards with a total of 4,850 elementary and secondary schools.

- In 2009, the Ontario Association of School Districts International (OASDI), a not-for-profit professional association, was established. Currently, it represents over 30 school boards and is “committed to advocacy and promotion of international education programs in Ontario public schools” (OASDI, 2016a).

The Private Schools and International Education Unit is located within the Ministry. Initially, the unit focused only on private schools but in 2014 it expanded its role to international education.

The Ontario Ministry published its first-ever international education strategy in 2015 and took a “leading role in championing international education as essential for twenty-first century learning” (Government of Ontario, 2015, p. 27). In the Ministry interviews, officials acknowledged that at “the K-12 level, many school boards have been active in international education for a long time. Some... [for] 20, 25 years... Ontario has been recruiting international students for decades, but there had been no real acknowledgment formally from the Ministry.”

Therefore, Ministry officials saw the Strategy as a way to support and encourage “new board[s] coming into it who had no idea of how it all operated [and] could access that opportunity,” especially school boards located in more remote locations in Ontario, although in no way did they see the Strategy as a means of “forc[ing] any kind of policy or regulation” and “interfere[ing] with what is already there.” However, Ministry officials expressed concern over the regulation of private schools that “are also bringing international students into the province in a big way, and they don’t have rules to follow and the[re is]...no one...watching.” On the other hand, OASDI and select school boards have positioned themselves as leaders in the steering and implementation of the Strategy. As an interviewee stated,

...we are pretty much driving that more than the Ministry itself is. I mean the Ministry is very limited with staffing and resources...they really don’t have the infrastructure in place or even the will really to be able to drive it.

It is important to note the following trends within the Ontario school sector. In Ontario, the total Kindergarten to Grade 12 enrolment declined by approximately 100,000 between 1997/98 and 2015/16. Between 2011 and 2016, enrolment in Ontario secondary schools declined by 63,742 students (Institute for Competitiveness & Prosperity, 2018). Shrinking enrolment, which has caused grave concern for the very survival of school boards and schools, has also not been evenly distributed across Ontario school boards. Some suburban school boards and French school boards have experienced an influx of students, while the student body of predominantly rural and northern school boards has dropped significantly. Thus, declining enrolment in elementary, but especially secondary schools, has been an important policy concern with major implications for lowered funding for schools/school boards (Campbell, 2018).

Manitoba. The Manitoba public K-12 sector has a similar three-level governance system to Ontario’s: the central authority (i.e., the Ministry of Education and Training), the intermediate authority (the school boards) and the schools (public schools, private/independent schools partly funded by the government, and private/independent schools with no provincial funding). Below is a brief description of the Manitoba policy actors that this study focused on:

- The Ministry of Education and Training (Ministry) is responsible for government policy in education, including decisions regarding curriculum, funding for public schools, and partial funding for some independent/private schools.
- School boards are required to ensure compliance with the provincial laws and policies, but they are also responsible to the interests of local communities. As such, school boards have significant autonomy and decision-making power, including raising property taxes for education. School boards are also responsible for policy development at the school level where they make decisions regarding programming, including starting an International Student Programs (ISP) in the division. In 2018, there were 38 school districts/divisions¹ in Manitoba, governed by school boards (Government of Manitoba, n.d.).
- The Manitoba Council for International Education (MCIE) is a non-government organization that helps to support international education activities in the province, involving both public and private educational providers across school levels (including both K-12 schools and post-secondary education institutions). There are 10 public school boards and five indepen-

¹ In Manitoba the geographical areas are mostly referred to as *school divisions*, which have the same meaning as *districts*.

dent schools that are members of MCIE and actively engaged in K-12 international education programs (MCIE, n.d.).

The International Education Branch of Manitoba Education and Training has been the main unit within the provincial government leading international education policy developments. The unit, initially established in 2001, was dismantled in 2016. While part of the Ministry of Education and Training, the unit was physically located on the premises of the Ministry's Trade Unit because, as confirmed by a Ministry interviewee, "international education is actually an export commodity. Obviously, it's education but it's also a trade commodity because what we are doing is we are actually bringing students in to consume the service in Manitoba." The Branch also worked closely with Manitoba Growth, Enterprise and Trade and MCIE.

Manitoba's formal international education strategy, announced in 2008, was developed as a by-product of Manitoba's broader international activities strategy ("Reaching Beyond Our Borders") to create one single access point for all provincial international activities, leading to greater financial and operational effectiveness (Thomas, 2008). Since then, Manitoba has developed several regulative documents in the area of international education and is the only province in Canada with a legal act adopted in international education — the "International Education Act" (2016).

Just as in Ontario, the Ministry was a latecomer to the area of international education with the International Student Program (ISP) in Manitoba public schools operating since 1995. The main rationale for schools to begin the ISP was two-fold: A lack of formal support for already enrolled international students and limited cross-cultural exposure for the local student population. A school administrator reflected: "We had some international students, but it was a very homogeneous, kind of a white European, school division. [There was] a vision for enhancing diversity." The demonstrated success of international education programs in British Columbia, which had been running already for a decade, became the initial learning site for this interviewee's school board and helped to convince the board to start something similar. The International Student Program was also seen as a good future investment to generate financial revenue for the school division. Nevertheless, with limited student numbers in the mid-1990s, the ISP in Manitoba primarily served a socio-cultural purpose.

Unlike Ontario, total student enrolment in Manitoba has shown a gradual increase since 2008, characterized by high Indigenous student numbers in the K-12 system. It is estimated that, between 2001 and 2026, more than 600,000 Indigenous youth will have attended Manitoba schools and have come of age to enter the labour market (Hull, 2008). Since September 30, 2017, there has been an increase of 0.8% (1,638 pupils) (Manitoba Finance and Statistics, 2018). However, despite the increase in student numbers, the government has introduced radical funding cuts (see Government of Manitoba, 2019), thus making funding of the public school system a policy issue.

Context of Text Production

Ontario. The International Education Strategy as a text published by the Ontario Ministry of Education defines internationalization "as an ongoing process of change in the school program and environment, with opportunities to enhance learning through the integration of international, intercultural, and/or global perspectives, cultures, and experiences" (Government of Ontario, 2015, p. 12). The Ministry identifies four strategic goals: (a) substantially increasing the number of international students in public schools; (b) internationalizing the curriculum, particularly the international languages and global curriculum; (c) enhancing international experiential learning opportunities; and (d) building international partnerships (Government of Ontario, 2015). The ultimate goal is to promote Ontario's education system at home and abroad while also increasing an awareness of and sensitivity to the Canadian values of inclusiveness, diversity, and equity. In speaking about the strategy, the Ministry interviewees emphatically expressed their interest in shifting the discourse within international education from an exclusive focus on international students to "our domestic students, going out for learning opportunities...[and] also the internationalization of the learning environment. "It is this aspect of the strategy that the Ministry interviewees valued highly as they felt this focus gave the strategy "a certain sparkle."

While the strategy offers no qualitative or quantitative measures for Ontario students' global learning, it quantifies and measures the goal of attracting and recruiting international students. Quoting a study commissioned by the Federal government, the strategy quantifies the gains from recruiting international students as more than \$4 billion per year and a creation of over 30,000 jobs, not to mention the

additional more than 50,000 short-term students pursuing language training, contributing another \$300 million in direct spending, and generating over 3,300 jobs (Government of Ontario, 2015). Here, the strategy document contradicts itself when it states that success “will not be defined in narrow terms, such as the number of international students enrolled in Ontario schools or the additional revenues received through tuition payments” (p. 15), because, ironically, it goes on to state that while there is “value they [international students] bring to the learning environment,... [these students] may also be recruited by boards in response to issues of declining enrolment in some areas, or as an additional source of revenue” (p. 10). As an interviewee stated, “not all of the [school] boards ... are very aware of this provincial strategy.” However, for the boards that are aware and engaged with the Strategy, “their participation is still based on one goal, and that is to bring in students and bring in revenue...that has been the driver for them.”

Interestingly, while the international education strategy references other strategies to emphasize “Canadian” values of fairness, equity and diversity by promoting inclusiveness and respect for diverse viewpoints and cultural experiences” (Government of Ontario, 2015, p. 1), none of Ontario’s other policies that address diversity, inclusivity, and equity such as its Education Equity Action Plan (2017), Anti-Racism Strategic Plan, Black Youth Action Plan (2017), and Indigenous Education Strategy (2017), references the international education strategy, suggesting policy silos in how these different policies speak to each other or work together to strengthen diversity and equity as Ontario’s “greatest assets” (Ministry of Education, 2009, p. 5). What is evident is that the direct impact of the international education strategy has been supporting and encouraging of the active recruitment of international students.

Manitoba. Manitoba’s International Education Strategy adopts Knight’s definition of the internationalization of education as “the process of integrating an international, intercultural or global dimension into the purpose, function or delivery...of education” (Government of Manitoba, 2008, p. 5). The Strategy lists five areas that aim to complement one another in order to adapt a holistic approach: (a) international student mobility programs; (b) international education projects and contracts; (c) offshore education; (d) international mobility of local students, teachers, faculty, and other staff; and (e) the internationalization of teaching and learning with a focus on curriculum. The strategy does not focus explicitly on the K-12 level, other than recognizing the increasing role of school divisions as important stakeholders in provincial internationalization activities, and it does not set any numeric performance indicators attached to any of its strategic goals.

Framing of the importance of international education is primarily done through emphasizing the inter-cultural aspects associated with international student mobility, for example, “The internationalization of education has vast potential for increasing intercultural awareness and promoting global understanding” or “International learners enhance Manitoba’s social fabric, bring unique perspectives to our classrooms” (p. 2). While the strategy recognizes the economic benefits associated with international education in Canada, the economic agenda is presented rather indirectly (“We aim to develop this [economic] opportunity fully” p. 3). In the interviews, most administrators rejected the idea of operating an International Student Program for financial purposes. Clearly, the very small number of international students enrolled in Manitoba schools does not bring in significant revenue for many schools yet, with the exception of a few school boards with larger numbers of international students.

A thread that runs through all international education policy documents in Manitoba is a threat of national competition. As Manitoba is not a typical destination of choice, Manitoba educators have to work twice as hard to attract students to the province. School administrators reflected: “We have a stiff competition. Winnipeg can be a little challenging to sell as a destination, but we try.” As an aspect of its competitive advantage, the Manitoba International Education Strategy clearly emphasizes the importance of providing high quality learning experiences for both international and local students. The document highlights the need to secure necessary support programs and services for international students as one of its goals. The Code of Practice (Government of Manitoba, 2015) and the International Education Act (Government of Manitoba, 2016) thus articulate their purpose:

- to protect international students attending education institutions in the province from potential fraud and negligence, and
- to promote Manitoba’s reputation as a high quality destination for international study by providing a measure of quality assurance through the IEA (Government of Manitoba, 2015, p. 2).

It is important to note that these policies were developed through a collaborative process between

the Manitoba provincial government and representatives of Manitoba educational institutions, including the K-12 sector, as part of the International Education Act Working Group. The policy developments were largely driven by concern over quality and reputation as demonstrated in the following quote from a government interviewee: "...because we have to protect the reputation of the province and we have to protect the students who come here." An administrator noted: "We don't have oceans and mountains to sell. ... Our strength is certainly our experience".

Context of Practice

Ontario. The Ministry attempts to balance its international education strategy between incoming international and outgoing Canadian students, in practice, as stated in the interviews: "Their participation is still based on one goal and that is to bring in students and bring in revenue...that has been the driver for them." It is, therefore, not unusual for international offices within boards to be perceived as "business unit[s]" engaged in capitalizing the good "opportunity...[that is] more and more students [are] wanting to come from abroad to Canada."

The engagement of boards in international education, mainly in terms of the recruitment of international students, has varied based on their geographies. Large urban metropolitan areas, with a wide diversity in their populations, draw a large number of international students. On the other hand, rural and northern boards, who have faced the largest declines in enrollment and are keen on increasing their international student numbers, face the largest challenges in attracting them as "newcomers don't like going North." Similarly, French language school boards, who are "very, very keen on the strategy" have also been disappointed as "international students want to come to Ontario to learn English and not French." With their primary focus being the recruitment of international students to fill spaces, generate revenue, and consolidate and secure their interests, a few active boards have become increasingly concerned with "issues around homestay guidelines and policies...[and] programming support for international students." However, there is currently an absence of province-wide policy or programmatic focus to meet the pedagogical, cultural, and linguistic needs of international students.

There is a wide variation among all 76 school boards in Ontario, each representing a different level of awareness and understanding of the province's international education strategy. As a school board interviewee went on to explain, school boards that have engaged with international student recruitment for longer periods and accumulated revenue from this activity have "... turned back [this revenue] into ... program development."

Manitoba. What started out as a cultural rationale for international education in Manitoba public schools is gradually shifting towards a more economically driven activity, characterized by strategic recruitment. One school board interviewee confirmed the changing rationales for internationalization: "Absolutely! We no longer need an international student program to enhance diversity ... what the International Student Program does now, it is a revenue source." Schools with higher numbers of international students are able to afford more attractive programming, further infrastructure investments, and additional staff. As a result, International Student Programs can serve as a tool leading to inequality among schools, where larger school divisions in Winnipeg can benefit more than those in rural areas, potentially widening gaps in access to resources and learning among students. However, according to one of the school administrators in this study, within her division, there have been policies put in place whereby money generated through the ISP is distributed more equally among the schools. Clearly, this is not a common practice among all school divisions.

The relationship between the Ministry and the school boards has, however, generally been collaborative and supportive. The regulative nature of the governments' policy documents, such as the International Education Act, has been regarded as a positive development by school administrators, enhancing the trust between the two stakeholders. CAPS-I, as a non-government organization, together with MCIE, have further brought educational stakeholders together in their help to support international education. The role of non-government organizations has grown even more since the provincial International Education Branch was dismantled, as they are serving as knowledge hubs with clear advice for school administrators.

The strong policy framework has become a protective mechanism for the international education market in Manitoba that tends to benefit all stakeholders. To maintain high standards and avoid any

public scandals in the media, schools have become cautious and quite selective in whom they accept, making sure to avoid negative experiences faced by students, school administrators, or host families. The following is an illustrative quote from an interviewee:

We ask our agents to send us children who can manage [to study abroad]. There are students we turn away if we don't get good references, if there are red flags. We are very cautious and careful. We do really want this to be right for [the students] and not just a way to make money.

For example, when it comes to host families, a careful screening takes place, as stated by an interviewee:

Our homestay manager goes to each of the schools once a week just to make sure to check on kids, to make sure everything is ok. We do a lot of follow up with our students to make sure that everything is on track.

Strong policy and regulative frameworks help to develop local-level practices and increase feelings of security among international students and their parents when choosing Manitoba.

Table 2

Comparison of Policy Contexts Following Ball's (1994) Framework

Policy context	Ontario	Manitoba
Context of influence (stakeholders, framing of IE, issues)	The Private Schools and International Education Unit (2014) – mainly has a regulatory function for private schools and supporting smaller/more remote public schools.	International Education Branch (2001-2016) as a core catalyst of international education policy framework. International education as part of trade industry.
	International education for maintaining & enhancing labour market's global competitiveness.	International students to enhance socio-cultural diversity and enhance revenue generation for a few schools/school boards.
	OASDI & select school boards the true champions and 'experts' since the mid-1990's with the Ministry's delayed entry into the policy arena in 2015.	Local school boards operating International Student Programs since 1995. Ministry as a latecomer to regulating international education policy. MCIE and CAPS-I providing support and expertise.
	Lower school enrollments & funding challenges.	Slowly increasing student enrollments with a high number of Indigenous students. Funding cuts in school budgets.
Context of text production (policies, rationales, cooperation)	MoE's International Education Strategy for K-12 (2015), Education Equity Action Plan (2017), Anti-Racism Strategic Plan, Black Youth Action Plan (2017), Indigenous Education Strategy (2017)	International Education Strategy 2009-2013, International Education Act (2016), accompanied by Code of Practice and Conduct (2015)
	Clear priority to increase market share through recruitment of international students and focus on revenue generation to meet declining enrollment and funding in school boards.	Strong national and international competition. Lack of perceived national and global attractiveness. Concern over reputation. Policy and regulatory frameworks developed to protect reputation of the province and learning experiences of international students.

Policy context	Ontario	Manitoba
Context of text production (policies, rationales, cooperation)	Emphasis on Canadian values of inclusiveness, diversity, and equity. Promoting shift from international recruitment to promoting domestic study abroad/international education.	Emphasis on quality of learning and services provided to the students.
	Policy silos between international education and other policies on inclusivity, diversity, and equity. Lack of awareness of strategy across school boards; few select school boards and OASDI on board.	Collaboration across Ministry units – trade, post-secondary education, and immigration. Strategic documents appreciated by schools as tools to enhance their credibility in recruitment.
Context of Practice (how IE is taken up in practice)	Key motivation is revenue generation; international offices within school boards are viewed as business units.	A gradual shift from cultural to economic rationale for attracting and hosting international students.
	School boards are at extremely different stages, and there is very little cooperation and knowledge about international education initiatives.	Inequality across school boards addressed by equalizing policies distributing funding generated by schools with larger numbers of international students.
	Lack of policy regulation and regulatory frameworks for homestay, guardianship etc. with the exception of a few boards.	High level of attention to programmatic supports for students (screening of host families, cultural events, individual approaches to accommodating student needs), infrastructure investments, and hiring of additional staff to support international students.

Discussion

As outlined in Table 2, there are some similarities and differences between the two provinces in terms of how international education has been approached as policy. We will start by identifying four key differences. The *first* difference lies in the organizational structure and positioning of the international education strategy in the two provinces. In Ontario, the strategy was announced by the Ministry of Education's Private Schools and International Education unit. This small unit is within the Ministry and was originally focused on regulating the private education sector. This finding suggests that perhaps regulating this sector was the key motive for the international education strategy in Ontario. In Manitoba, on the other hand, the strategy was put forth by the International Education Branch, located on the premises of the Ministry of Growth, Enterprise, and Trade. In both cases, the positioning is quite telling. In Ontario, the Ministry speaks of being cautious about regulating the international education sector, yet its international education strategy is housed in a unit primarily concerned with regulating schools, albeit the private sector. In Manitoba, while the Ministry and school boards have emphasized the importance of cultural diversity as a key rationale for the recruitment of international students, the government structurally recognizes international education as part of its trade industry.

Secondly, there is a difference between the two provinces when it comes to ensuring quality and standards in international education. Manitoba's three relevant policy documents all highlight the importance of reputation and quality of learning; the quality of learning has become the main foundation for its recruitment efforts. As Manitoba has relatively fewer international students compared to Ontario, the province sees it as essential that its international students and their parents are satisfied with their experience. Government officials admit that the province cannot take any scandals in relation to its international students, as this would dismantle all their recruitment efforts. Manitoba's approach is likely a result of its specific geography and relative importance *vis-a-vis* a larger and more economically strong

province like Ontario that does not perceive the same challenges. In fact, reputation and quality are largely taken for granted in the Ontario context, and, as a result, Ontario has not developed any kind of provincial regulatory frameworks to secure the quality of learning. However, both the Ontario Ministry of Education and the school boards recognize the challenges associated with unregulated policies such as unethical recruitment and marketing, and problems with guardianship and homestay.

The *third* difference between the two provinces relates to how local stakeholders view the importance of and need for policy regulation. In Ontario, OASDI members clearly see themselves as leaders in the steering and enactment of Ontario's K-12 international education strategy and are cautious of overregulation and direct interference by the Ministry. In Manitoba, school administrators were largely supportive of provincial regulative practices. As efforts were made to include school administrators in the policy discussions and the goal of the regulations was to secure coherence and quality of learning experiences, those regulative frameworks were therefore appreciated. MCIE and CAPS-I play an important role among K-12 school administrators in Manitoba, providing even more specific advice through developing guidelines to help schools. These findings tie back to how the two provinces view their attractiveness and their likely success in recruiting international students.

The *fourth* difference lies in the competitive versus collaborative spirit in the two provinces. In Ontario, each school and school board fends for itself, and they compete with one another when it comes to recruitment activities. There is little shared information and knowledge of best practices, in spite of the existence of OASDI. However, this is different in Manitoba, where schools often work together with the province, MCIE, and other school divisions to get international students to Manitoba; after these students choose Manitoba, then decisions are made about the specific schools they will attend.

What is perhaps most interesting is how, despite these seemingly distinct differences between the two provinces, similarities in policy contexts prevail. In both provinces, the policy text defines international education in a comprehensive way by focusing on aspects of international education that include curriculum, language education, exchanges, and study abroad for Canadian students. Manitoba's international education strives to take "a holistic approach" focused on "preparing our citizens to succeed in the world of tomorrow" (Government of Manitoba, 2008, p. 5). In Ontario's strategy, international education aims to reduce "geographic and social/economic barriers to student achievement" (Government of Ontario, 2015, p. 13); Ontario links international education to its province-wide educational objectives of inclusiveness, diversity, and equity. What is striking is that, in both cases, paradoxes and contradictions in objectives are clearly evident. Policy as context, text, and practice eventually responds to the importance of international education as a source of revenue achieved primarily through the recruitment of international students. In both provinces, under Liberal, Conservative, or the New Democrats there has been a reduction in government funding to public education. Both provincial governments have subscribed to a neoliberal ideology, providing further impetus for international student recruitment as the main, and in some instances the sole, activity that drives international education. Thus, while there is a discourse of international education in terms of its broader socio-cultural and educational benefits, the economic benefits prevail. Increased revenue through tuition fees, feeding into higher enrolments and fees for the post-secondary sector and a positive impact on high skilled immigration, is important to both provinces. These findings are also observed at the level of schools and school boards. Funding cuts remain at the heart of core policy issues. It is these funding challenges, regardless of enrolment declines in Ontario and enrolment increases in Manitoba, that manifest in the growing attractiveness of international education as a revenue-generating activity for K-12 educational systems. Thus, government policy and school policies are aligned when it comes to prevailing ideological and economic contexts, serving as the context of influence in policy development.

Another similarity lies in the very active roles played by school boards, schools, and program coordinators in enacting international education policy. International education is certainly not mandated by either of the provincial governments; however, its attractiveness for the reasons stated above is what stimulates the boards' and schools' activity, with several establishing new programs and hiring staff for marketing to and recruiting international students. In fact, in both provinces, government policy followed and did not actually lead school board policy in international education, suggesting the dominance of the economic discourse across stakeholder groups. In both provinces, the larger urban school boards are the more powerful and influential policy actors; they are clear leaders in terms of numbers, students, and funds. Notably, the voices and discourses of holistic approaches and equity, diversity, and inclusivity

are silenced when it comes to the context of practice. Thus, here again we see contradiction and irony in policy. In the case of both provinces, the school boards/schools that are in most need of students and/or funding are the ones that fail to attract student numbers, student diversity, or revenue. These findings are evidence of a widening gap between different school boards, ultimately impacting their ability to assure equity in access, resources, and learning environments.

Conclusion

The objective of this paper was to examine the relationship between policy and practice as it relates to K-12 international education contexts. In this section, we return to our research questions and emphasize the key findings of the study. The first question asked: *How is international education approached as a policy at the K-12 level?* Our findings reconfirmed the assertion of critical policy studies that policy is not simply a government text or directive but a bottom-up activity driven by stakeholder interests, not by strategic policy texts. This assertion has also been confirmed by evidence from the K-12 international education policy scene. As is clear in both the Ontario and Manitoba contexts, international education as policy was active as practice within schools and school boards way before the official announcement of a strategy or policy was made by the government. School boards had formed associations such as OASDI in the case of Ontario and MCIE in the case of Manitoba to facilitate knowledge and activities around international education. Therefore, while the Ministries of Education may be considered “officially” the originators of the two provinces’ international education strategies as written policy documents, OASDI/MCIE and select school boards can be considered the “unofficial” initiators of the policy movement in both provinces that led to formal policy documents later. This study thus affirms the need for critical policy studies that look at other actors besides the state.

Second, we asked: *What contextual factors have led to the impetus for K-12 international education activities? How has this policy been constructed and practiced by different actors?* Finances have served as the core policy context for international student recruitment in both Ontario and Manitoba. Reduced government funding and a growing acceptance of neoliberal practices within education have become increasingly the norm, regardless of the type of government in power. Despite distinct provincial histories, geographies, and socio-cultural contexts, school boards in both provinces are increasingly recruiting international students, directly encouraging market-like behaviour within public systems of education. Ontario is responding to both demographic and financial challenges, while Manitoba is focused primarily on its fiscal challenges accompanied by an emphasis on the diversity that international student recruitment brings to the province. In both provinces, international education is viewed as a lucrative industry with government policy serving as a legitimizing mechanism for schools to engage in growing marketization efforts.

However, at the level of policy construction and practice, we observed a difference. As an economic and demographic “giant” in Canada, Ontario does not face the same level of challenges as Manitoba in attracting and retaining international students. This difference has resulted in a much more collaborative and cooperative approach in Manitoba and one that is more regulated to protect the quality and reputation of its education. The quality of Manitoba’s international education program is seen to provide leverage over other provinces because, as one administrator said, “We have to differentiate ourselves.” The fear of losing students to other provinces (or countries) has forced Manitoba’s educational institutions to work together in the belief that a rising tide lifts all boats. Perhaps it is this recognition of its relatively poor standing and extreme need to be competitive that resulted in Manitoba announcing its international education strategy almost seven years ahead of Ontario?

Finally, we asked: *What has been or is likely to be the impact of international education policy on public school systems in Canada?* The lens of critical policy studies reveals the contested nature of international education policy. As a public school system, the Canadian K-12 system is state supported and known for its relatively high quality standards distributed equally across the board. Most Ministries and school boards are committed to ensuring access, equity, and inclusivity. However, when it comes to international education, we see the potential for widening gaps in terms of funding, resources, and student learning experiences. The differences that arise between schools and school boards as a result of international student recruitment do not seem of particular concern to Ministries of Education. International education brings wealthy students who can afford to pay high tuition into a school system that is, in principle, free, accessible, and equitable to all students, regardless of their socioeconomic status.

In creating a tiered system, there seems to be little, if any, concern for educational national/provincial imperatives of access, ethics, and equity that form the very foundation of our public education system (Tannock, 2013). There is little expressed concern regarding the significant inequalities of opportunity for potential international students, nor concerns about which international students we attract in terms of race, class, gender identity, religion, and physical or intellectual ability—all factors that have been identified by the Ministry as key to ensuring “equitable educational outcomes for all students” (Ministry of Education and Training, 1993, p. 5).

Scholars such as Waters (2006) and Fallon & Poole (2014) have expressed concern about how international education programs in Canada are associated with the increasing privatization of public education, while others such as Waters (2006), Yoon (2011), and Bosetti, Van Pelt, and Allison (2017) have addressed the issue of Canadian public schools producing a new wave of global dominant elites. All of this scholarship has raised serious concerns about how international education in the K-12 sector encourages privatization and inequity and thereby supports values that are antithetical to the very core of Canada’s public educational system. What needs to be examined, and should be the concern of *all* educational policy makers, is the dominant trope of recruiting international students as “cash cows” (Stein & Andreotti, 2015) and turning a blind eye to our political, social, and cultural priorities of inclusivity, diversity, and equity.

Critical policy studies ultimately view policy as inherently complex, political, and value-laden (Bowe, Ball, & Gold, 1992; Stone, 2012). On the surface, the Ontario policy text embraces organizational and environmental change within schools when it comes to curriculum, language education, and inter- and cross-cultural learning. However, when peeling the layers of policy as practice, one sees how international education as policy is understood, translated, and enacted locally. In the case of Ontario, what is revealed is the conflicting policy messages. On the one hand, the Ministry speaks of international education, reflecting the importance of a more balanced approach to mobility, as well as a broader strategic approach to curriculum and language enhancement. On the other hand, its enactment by several policy actors is purely economic and instrumental.

This paper has several implications for education and particularly for educational administrators, who are key non-state policy actors in international education policy, its construction, enactment, and outcome. As an important stakeholder group, educational administrators should be actively involved in broader debates around ethical practices in K-12 internationalization focusing on inclusion, equity, and reciprocity and should be contesting and resisting its current construction. They need to give voice to international students who, in many local contexts, once they arrive, are left on their own without proper support for their learning. School administrators need to voice a clearly articulated vision for going beyond marketization and focusing future efforts on the education in international education (i.e., changes to curriculum, language education, and inter- and cross-cultural learning for all students). The findings in this paper also point out the pressing need to change schools’ hiring policies, so that school administrators, as well as teachers, can reflect the gradually increasing diversity among the student population that we see in the K-12 sector. With such diversity will come resistance, differential interpretation, and questioning of practice, which offers us hope that there will also come a shift in our policy and practice towards more equitable engagement in international education.

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