



Dame Sara Thornton DBE QPM
Independent Anti-Slavery Commissioner
5th Floor, Globe House
89 Eccleston Square
London, SW1V 1PN

Tel: +44 (0) 20 3513 0477
Email: shelley.perera@iasc.independent.gov.uk

14 August 2020

The Rt Hon Gavin Williamson CBE MP
Secretary of State for Education
Sanctuary Buildings
20 Great Smith Street
Westminster
London
SW1P 3BT

Dear Secretary of State,

As Independent Anti-Slavery Commissioner, I am writing in relation to engagement my office has had on Tier 4 student visas and potential links to trafficking and exploitation, particularly concerning students from Vietnam.

In February 2020 during a meeting with policy advisors in Downing Street, a Times report on this issue from November 2019¹ was discussed. I agreed that I would reach out to the appropriate schools to alert them to the risks. I subsequently wrote to the Boarding Schools Association (BSA), the Independent Schools Council (ISC), the Association for Education and Guardianship of International Students (AEGIS) and the Independent Schools' Bursars Association (IBSA). I was keen to acknowledge good practice in the sector such as the development of a Certified Agent Scheme² by the BSA and the AEGIS guardianship accreditation scheme³, but also to encourage schools to be vigilant on this issue.

My office has since had positive engagement with each of these bodies. I am encouraged by the sector's desire to develop an understanding of modern slavery and human trafficking and their commitment to safeguarding more broadly. During meetings with my office, several suggestions for collaboration were discussed, including co-production of a short child trafficking guidance document for the sector and an article for the Bursars' Review magazine. I am conscious that safeguarding challenges in the sector extend beyond child trafficking and beyond my remit as Independent Anti-Slavery Commissioner. I would therefore encourage the Department of Education to explore these communication and awareness raising opportunities further, as there is a clear appetite for collaboration and a desire to share learning.

¹ The Times (2019) [Up to 40 Vietnamese teenagers trafficked from private schools](#)

² Boarding Schools Association (2020) [Boarding Schools Certified Agent Scheme 2020-2023](#)

³ Association for Education and Guardianship of International Students (2020) [Guardianship Organisations](#)

The organisations have raised the lack of statutory regulation of guardians for international students. There are voluntary accreditation and certification schemes, however, these only cover a proportion of international students in the UK who are cared for by guardians. I also understand that where a homestay is shorter than 28 days, there is no requirement for the homestay to be vetted if arranged by an unaccredited guardian. I have been made aware of cases of international students, under the age of 16, being placed unaccompanied in unsupervised accommodation and in unsuitable homestays. I therefore wanted to ensure these issues were brought to your attention, particularly in the light of plans to consult on the National Minimum Standards for Boarding Schools.

Lastly, it has been suggested to me that the response on these matters lacks co-ordination across Whitehall and that there are inconsistent messages. I would suggest that consistent messaging and clear guidance on responsibilities for monitoring independent guardians and safeguarding of international students more broadly is vital and needs to be improved.

I look forward to receiving your response. In the interests of transparency, I request that you respond in a way that enables me to publish your letter on my website.

Yours sincerely,

A handwritten signature in black ink, appearing to read "San Yuen". The signature is fluid and cursive, with a long horizontal stroke at the end.

Independent Anti-Slavery Commissioner



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Rt Hon Gavin Williamson CBE MP
Secretary of State

Sanctuary Buildings Great Smith Street Westminster London SW1P 3BT
tel: 0370 000 2288 www.education.gov.uk/help/contactus

Dame Sara Thornton DBE QPM
Independent Anti-Slavery Commissioner
By email: Sara.Thornton@iasc.independent.gov.uk

24 November 2020

Dear Sara

Thank you for your letter of 14 August and 24 September, regarding the safeguarding of international students. I apologise for the delay in my response.

Ensuring the safety and well-being of international students who choose to study in the UK is of huge importance not only to me and my department, but also to many other departments across Whitehall.

I note you have had positive engagement with a number of organisations in relation to international students and boarding arrangements, and that they have made you aware of a number of concerns, in particular, relating to the regulation of guardians.

As you will know, the government has prioritised a number of issues for safeguarding in education and revising the National Minimum Standards for Boarding Schools is one of these priorities.

As part of this work, we are proposing a new standard for boarding schools guardianship arrangements, which will require schools to take appropriate steps to ensure students are safe and the arrangements promote the physical and well-being of the student. Schools will also be required to report any concerns over these arrangements to the appropriate authorities. We continue to work with the Home Office on strengthening the system in this area.

We are also proposing a new standard for promoting good relationships, particularly with staff who should then be able to identify and protect students from harm, and we will continue to consider the safety of international students as we update our guidance on keeping children safe in education. The guidance is available at: tinyurl.com/P9cxb7e.

I also note there are concerns in relation to international students attending short-stay educational placements that are unregulated. In these circumstances, UK Visas and Immigration (UKVI) places requirements on the setting sponsoring the student, as part of their approval through UKVI as a trusted sponsor.

These requirements include reporting if a student fails to enrol, defers their studies after arrival in the UK or withdraws from their course before arriving in the UK. UKVI can apply sanctions and remove highly trusted sponsor status from schools that fail to comply with sponsorship arrangements.

I would like to take this opportunity thank you for the important work that you do for which we are grateful. We will continue to work with other departments on this Important issue.

Thank you for writing on this important matter.

A handwritten signature in blue ink, appearing to read 'Gavin Williamson', with a long horizontal line extending to the right.

Rt Hon Gavin Williamson CBE MP
Secretary of State for Education