

POLICY BRIEF: CHECKLIST FOR HUMAN RIGHTS DUE DILIGENCE IN INTERNATIONAL STUDENT RECRUITMENT

By Anna-Greta Pekkarinen (HEUNI)



Scoping emerging forms of trafficking in
human beings in the Nordic countries



INTRODUCTION

A large number of students from countries outside the EU study in Nordic higher education institutions. Many educational institutions co-operate with accredited recruitment agents who assist them in international student recruitment. However, in some countries of origin, **recruitment processes may involve inflated or irregular fees, misinformation, and false promises** made by agents. These practices create financial strain and debt for students and their families. Unregulated or “wild” agents pose a particular challenge because they operate outside formal agreements with educational institutions, making their activities difficult to monitor or regulate.

Prospective students may overestimate their chances of finding employment to finance their studies. **Income requirements, tuition fees and high living costs combined with limited access to decent work during studies contribute to financial insecurity.** A shortage of affordable accommodation and difficulties in meeting basic needs further increase this burden. Economic stress may push students into precarious work and exploitative arrangements. At the same time, it is important to emphasize that not all international students encounter problems: the majority progress in their studies, graduate on time, and do not experience exploitation.

While educational institutions have begun addressing some of the challenges related to international student recruitment, **they still appear to lack comprehensive human rights due diligence frameworks.** In the educational sector, human rights due diligence entails establishing appropriate governance and management structures, establishing a comprehensive policy, embedding due diligence into existing risk management processes, addressing and remediating identified cases, measuring performance, revising existing processes, and communicating on the actions taken. Engaging with rights-holders is a core component of this process.

The following pages present checklists designed for the purpose of establishing human rights due diligence processes in educational institutions across all their operations, and more specifically, their operations related to international student recruitment.

This policy brief is based on the HEUNI Report Series No. 113, “From aspiration to exploitation. Recruitment and employment related risks faced by international students before, during and after their studies: A Nordic scoping review with a focus on Finland” by Anna-Greta Pekkarinen, Natalia Ollus, Anniina Jokinen, Laura Järvenpää, Saara Haapasaari, Jenna Kenttälä and Sofie Relander. (https://bit.ly/student_expl)

Published in Helsinki by the European Institute for Crime Prevention and Control, affiliated with the United Nations (HEUNI) in 2026. This study has been prepared with funding from the Nordic Council of Ministers by experts at HEUNI.

CHECKLIST FOR A HUMAN RIGHTS DUE DILIGENCE PROCESS COVERING ALL OPERATIONS OF AN INSTITUTION

This checklist is intended for the purpose of identifying building blocks for a comprehensive human rights due diligence process covering all the operations, including student recruitment, staff recruitment, research activities, procurement of services, procurement of products, investment portfolio, etc.

- **ESTABLISH GOVERNANCE** structures: board accountability, cross-sector working group for implementation, ownership and resources.
 - **A. ESTABLISH** human rights due diligence policy covering all parts of operation and all steps of the due diligence process.
 - **B. CONDUCT** a mapping of the institution's operations and partnerships.
 - **C. CONDUCT** comprehensive risk identification and assessment based on the mapping.
- **DESIGN, IMPLEMENT** and revise actions to address risks and impacts.
- **ENSURE TRAINING** of persons in key roles, increase awareness and competencies overall in the organisation.
- **ENSURE PROCESSES** for contracting, monitoring, and using leverage in procurement and with partners.
- **ENGAGE WITH** key stakeholders (e.g. students, staff, employees of service providers on sites, etc.) to inform the risk assessment and consequently the due diligence process.
- **COMMUNICATE ACTIVELY** on the whistleblowing channels and complaints/grievance processes.
- **ENSURE COMPREHENSIVE** collection of data for due diligence purposes to continuously improve risk assessment and enable a risk-based approach.

ACTIONS WITHIN THE HUMAN RIGHTS DUE DILIGENCE PROCESS SPECIFICALLY IN RELATION TO OPERATIONS RELATED TO INTERNATIONAL STUDENT RECRUITMENT

This section has its focus specifically on the operations and actions that take place within international student recruitment. This is one section of an institution's operations. These recommendations are focused on this specific section.

- **ENSURE CLEAR** and comprehensive communication to prospective students regarding the university's contracted agent partners, guidance on choosing an agent, complaints channels, and on the conditions in the country of destination regarding cost of living, and scarcity/absence of part-time work opportunities.
- **CONDUCT A** screening of prospective agent partners and exclude partners that lack maturity and resources for ethical conduct, that lack a track record of ethical conduct, or that have been identified as unreliable partners by other organisations.
- **ENSURE ROBUST** contractual clauses with clear requirements on obligations towards the educational institution and the student, establishing the rights to access information in relation to the agent partner's conduct, establishing roles and responsibilities in cases of misconduct and need for remediation, eventual right of terminating the contract in case of unwillingness to correct misconduct.
- **ENGAGE AND** train the agent on the concrete expectations, and relevant rules and regulations.
- **MONITOR THE** agent conduct, including, engage with international students on their experiences in the application process.
- **REVIEW THE** agent performance and eventually renew the contract if applicable.
- **COMMUNICATE PUBLICLY** on the due diligence process, any issues identified and actions taken.
- **ENSURE TRAINING** on the risks, the university's approach, and specific training on human rights due diligence process approach to key persons, and staff, and students in general.

CONCLUSION

International students may be exposed to risks already at the recruitment stage, which may increase their vulnerability to exploitation and trafficking later during their studies or after graduation. **Being in a precarious financial situation is the key underlying risk factor for exploitation.** The need to find work by any means necessary to support themselves and their families and a lack of information on their rights in the Nordic labour markets may lead some international students into exploitative employment. High unemployment in Finland and Sweden further limits access to decent work, even after graduation.

A successful response to the challenges will require **coordinated action between migration, education and employment policies, and enhanced cooperation between government entities, educational institutions, municipalities and other actors.** The activities of recruitment agents should be regulated more effectively, and educational institutions and state authorities should ensure that prospective students receive accurate and realistic information about living conditions in the destination country. After arrival, local authorities and organisations should assist the students, their spouses and children in accessing adequate support services and integration opportunities. The students should also have pathways to decent employment during and after their studies.

Overall, **educational institutions must continue to strengthen their human rights due diligence processes** to comprehensively identify, prevent and address risks of exploitation associated with international student recruitment.

HEUNI's recent study on the risks of exploitation and the challenges faced by international students in Finland and the Nordic region shows that exploitation is multiphased, systemic, and linked to both external recruitment ecosystems and national policy structures. As a solution, the report provides a set of building blocks for a comprehensive human rights due diligence framework for educational institutions.

Contact laura.jarvenpaa@om.fi for more information and also for tailored presentations and trainings on this topic.

We provide training also in Finnish, Swedish, Russian, and French.

