

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

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



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Executive Summary

This scoping review focuses on mapping recruitment and employment-related risks faced by international students before, during and after their studies in the Nordic countries. The focus is on Finland, since problems related to the recruitment and integration of international students has received significant attention in Finland compared to its Nordic neighbours.

DRAWING ON EXPERT AND student interviews, a survey targeting representatives of Finnish higher education institutions, various official reports, academic sources, media articles, and Nordic consultations with practitioners, the scoping review highlights growing concerns about the risks of exploitation faced by international students.

Many education institutions co-operate with accredited recruitment agents. In some countries of origin, recruitment processes may nevertheless involve inflated or irregular recruitment fees, misinformation, and false promises made by agents. These practices create financial strain and debt for students and their families before arrival in the country of destination. 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 international students may overestimate their chances of finding employment to finance their studies. Income requirements, tuition fees and the high costs of living combined with challenges in accessing decent work during studies contribute to financial insecurity. Housing problems, such as limited availability of affordable accommodation and difficulties meeting basic needs result in additional burden. This economic stress may push students into precarious work and into accepting different exploitative arrangements.

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Labour exploitation is a recurring concern affecting international students across the Nordic region. Students working in lowpaid sectors, including platform work and seasonal jobs may face underpayment of wages and long working hours. These risks may also extend to spouses and family members. Although evidence is more limited, there are indications that international students may also encounter other forms of exploitation, including sexual exploitation, forced marriage, or exploitation in criminal activities. Shame, fear, and limited knowledge of rights can prevent disclosure and hinder access to support. Risks do not end at graduation. Difficulties in finding decent work may leave graduates dependent on unscrupulous employers during the transition to workbased residence permits, prolonging vulnerability.

While the findings of this scoping review indicate that Finnish higher education institutions have begun addressing some of the adverse impacts linked to international student recruitment, they still lack a comprehensive human rights due diligence framework. The current Finnish Code of Conduct that regulates the use of agents in countries of origin lacks specific contractual clauses that define the responsibilities and roles of actors involved in student recruitment, remediation to students, and the termination of agreements.

The review concludes that the risks of exploitation faced by international students are multi-phased, systemic, and linked to both external recruitment ecosystems and national Finnish and Nordic policy structures. To overcome challenges and risks identified, a set of recommendations to governments, educational institutions and other key actors, as well as a checklist for a human rights due diligence process covering an educational institution's operations are presented at the end of this review.

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Introduction

In recent years, Finnish media has reported on an increasing number of cases involving the exploitation of international students in Finland. Media accounts have outlined exploitative recruitment practices, including inflated costs for provision of information about educational opportunities in Finland, for language courses and for assistance in applying for study programmes and residence permits.

DISHONEST RECRUITERS GIVE FRAUDULENT promises and deceive applicants about the cost of living and opportunities for finding employment in Finland during and after their studies. Furthermore, students have been made to sign contracts setting restrictive frames for their behaviour, including fines for breaching the conditions of such contracts.

The media reporting has resulted in a public debate in Finland regarding the charging of unlawful recruitment fees, destitution and exploitation of international students, and the role of educational institutions and private businesses in facilitating such problems. These questions have also led to attention by the authorities and the Finnish government, with e.g. a recent government report on problems related to residence permits for international students published in December 2025 and the preparation of subsequent legislative changes.¹

This scoping review was written between January 2025 and February 2026. During this period, the question of international students in Finland was debated nationally in media but also by authorities and other stakeholders. Several legislative changes were introduced during the drafting of this report, and the questions at hand evolved during the drafting process. The effects of recent changes, therefore, cannot be assessed, as this review covers the period until the end of 2025.

Our aim was to map potential risks of exploitation as well as the challenges that international students may face while

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¹ Ministry of Economic Affairs and Employment 2025.

applying to and studying in Nordic educational institutions and living in the Nordic countries. While the situation of the vast majority of international students does not amount to exploitation or human trafficking, there are indications of increased vulnerability among international students who are in debt, cannot find adequate employment, and cannot pay their tuition fees. They may agree to any work they can get, and thus, end up in exploitative situations. At worst, such exploitation may amount to human trafficking.

In this scoping review we therefore **outline the modus operandi of the networks and middlemen that place students at risk of debt and exploitation.** We also **explore whether these risks exist also in the other Nordic countries, and what preventive measures should be taken.** Based on the scoping review, we will propose measures to be taken to address vulnerabilities among students and actions for educational institutions to prevent exploitation.

The focus of this review is on Finland, since problems related to the recruitment and integration of international students has received significant attention in Finland compared to its Nordic neighbours. However, whenever we have been able to identify relevant information from the other Nordic countries, or other countries in Europe and beyond, details have been included. Limited attention to these issues in other Nordic countries could be due to them being less common, or it may reflect a more limited awareness of such challenges. Nevertheless, our hope is that this report will serve to raise awareness of this phenomenon in all of the Nordic countries.

Data and methods

THIS SCOPING REVIEW IS based on three main sources of information: public documents, a survey targeting Finnish higher education institutions, and qualitative, semi-structured thematic interviews. Initially, we sampled Finnish and Nordic policy documents, research reports/articles and media articles mainly from the last five years. We included key policy documents and reports especially from Finland, but also from the other Nordic countries and beyond, whenever we were able to find relevant information.

We also included media sources. Media can provide an important source of information when exploring and contextualising new topics or issues that have yet to be handled by authorities and researchers. Media articles have thus been

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included to illustrate the occurrence, extent and societal relevance of the phenomenon and to identify case examples. The articles serve as an indicator that the issue is legitimate, timely and worthy of closer attention. Media sources have been referred to as such in the text and in the list of references in order to differentiate them from, e.g., policy documents or academic sources. The main media sources utilized include Yle (the Finnish Broadcasting Company), Helsingin Sanomat (Finland's largest newspaper) and Hufvudstadsbladet (Finland's largest Swedish-language newspaper). Potential weaknesses of media sources may include a level of simplification, potential bias, and limited scope on the reported issues.²

At the onset of the scoping review, a background survey was circulated among Finnish higher education institutions to understand, i.a., which countries the institutions recruit international students from, what type of partnerships the institutions have with recruitment agencies, how the institutions inform students about life in Finland, and whether the institutions are aware of students having problems to sustain themselves. The survey was open between 5–19 March 2025, and was sent to persons responsible for international affairs/international relations, student counsellors, and the management of 22 universities of applied science and 12 universities in Finland. The survey garnered 49 responses from at least 25 different educational institutions (not all participants gave their institutional affiliation). The results are not statistically representative but provided valuable insights into the phenomenon from the perspective of the educational institutions. In addition, many respondents offered informative answers to the open-ended questions.

We then conducted 17 semi-structured interviews with professionals, with 27 interviewees in total. The interviewees included representatives from the Ministry of Education and Culture, educational institutions, municipalities, a well-being services county, Helsinki police, border guard, assistance provision, integration services, a trade union, as well as an independent educational policy expert. Moreover, we consulted eight professionals with whom we did not conduct formal interviews, either because the discussions occurred on an ad hoc basis or because the professionals preferred to be

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² See also Jokinen, Ollus & Viuhko 2011, 135.

off-the-record due to their insights being, e.g., based on limited or second-hand information.

Two group interviews and one individual interview were conducted with six non-EU international students in total to get first-hand information of their experiences. The students were in different stages of their studies: one newly enrolled in and one about to graduate from a Bachelor’s program, one half-way through a Master’s program, two conducting PhD studies, and one who worked for a company after obtaining a Master’s degree.

We took part in a hearing organised by the working group set by the Ministry of Economic Affairs and Employment of Finland that examined the regulatory vulnerabilities of work-based and education-based residence permits. Additionally, we initiated discussion on the topic in various other meetings with national and Nordic counterparts throughout the project, including in a consultation meeting with the Nordic anti-trafficking coordinators and the Nordic police network, organised in Helsinki on 24 April 2025; in the Nordic conference “Scoping Emerging Forms of Human Trafficking”, organised in Helsinki on 26 November 2025; and in the European Forum against Trafficking in Human Beings organised by the Council of the Baltic Sea States in Stockholm on 3–4 December 2025.

The interviews are referred to by number and the role of the interviewee, as presented in table 1 on the following page. The review includes interview quotes to help illustrate the phenomenon. Most of the interviews were conducted in Finnish, so Finnish quotes have been translated into English. Some have been shortened by the authors for clarity and conciseness, without change to their substantive content.

Artificial intelligence tools (e.g., Microsoft Copilot) were used in the making of the scoping review to support data collection and translation. The accuracy of AI-assisted outputs was reviewed and confirmed by the authors.

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Table 1. Interviews for the scoping review.

	Number of inter- viewees	Interview month	Organisation
Interview 1	1	June 2025	Higher education institution
Interview 2	1	June 2025	Ministry of Education and Culture
Interview 3	1	June 2025	Institution of upper secondary education
Interview 4	2	June 2025	Ministry of Education and Culture
Interview 5	1	June 2025	Assistance provider
Interview 6	1	June 2025	Law enforcement
Interview 7	1	June 2025	Wellbeing services county ³
Interview 8	4	August 2025	Municipality
Interview 9	1	August 2025	Educational policy expert
Interview 10	1	September 2025	Higher education institution
Interview 11	1	September 2025	Law enforcement
Interview 12	3	September 2025	International students in a higher education institution
Interview 13	2	September 2025	International students in a higher education institution
Interview 14	1	September 2025	International alumni of a higher education institute
Interview 15	1	November 2025	Municipality
Interview 16	2	December 2025	Integration service provider
Interview 17	1	December 2025	Icelandic Directorate of Immigration
Interview 18	5	January 2026	Finnish Immigration Service
Interview 19	2	January 2026	Trade union
Interview 20	1	January 2026	Assistance system for victims of human trafficking

³ In Finland, wellbeing services counties are responsible for organising publicly funded social and healthcare services and rescue services within their own geographical area of operation.

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Limitations of the scoping review

THE ENTRY OF INTERNATIONAL students into Finnish upper secondary schools and higher education institutions is a process that can be examined from multiple and sometimes conflicting perspectives. The challenges and opportunities vary significantly depending on whether the focus is on the individual student, the educational institutions involved, the government, or society as a whole.

To fully delve into the topic of risks of exploitation and trafficking in recruitment and integration of international students from every angle would require extensive research and a deep understanding of educational policy, which is beyond the scope of this review. The review therefore does not aim to provide a comprehensive analysis of education and migration policies or their effects in Finland or the other Nordic countries. Rather, **this review sets out to examine the risks of trafficking and exploitation potentially faced by international students before, during and after their studies.**

It is also important to note that **the risks of exploitation and trafficking in recruitment and integration do not materialize for the majority of international students:** many complete their studies without problems and are overall satisfied with their experience. Nonetheless, identifying and addressing potential risks is essential to ensure that potentially vulnerable students are not exploited during the application process, nor in the labour market during and after studies, and that they are able to develop their skills, pursue opportunities and build a meaningful life either in the Nordics, or have the ability to freely move elsewhere after completing their studies.

The review is organised to follow the trajectory of international students' experience in Finland. It begins by outlining the Finnish higher education system and comparing it with other Nordic countries. Secondary education and commissioned education in Finland are also presented in brief. A timeline of legislative changes in Finland provides context for policy developments. The core analysis is organised into three sections corresponding to stages where risks may arise: before, during, and after the studies. These sections examine issues such as dishonest recruitment practices, livelihood challenges, exploitation in working life, and vulnerabilities linked to commissioned education and underaged students. The review then discusses risk management and mitigation measures through the lens of human rights due diligence in the education sector. Finally, conclusions are presented, followed by recommendations for relevant stakeholders.

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Terminology

THE MAIN TERMINOLOGY USED for this review is listed below. These terms are mainly related to the Finnish context and may not fully correspond to the terminology used in the other Nordic countries.

Apprenticeship training: Vocational education and training in which the student acquires skills mainly or entirely at a workplace through practical tasks, and where the student is typically employed by the employer under an employment contract. Some supplementing studies in an educational institution may be included, when necessary.

Commissioned education: Education provided under contract for external parties. Higher education and vocational institutions can organise degree-oriented education for a student group so that the training is commissioned and funded by the state, another state, an international organisation, or a national or foreign public entity, foundation, or private organisation. Students from both within and outside the EU/EEA can participate in commissioned education in higher education, and based on Government Proposal 143/2025, vocational institutes, which currently can provide commissioned education for non-EU/EEA students only, will be granted the same right in 2026.⁴

Educational agent/agency: A company or an individual that offers assistance in applying to educational institutions, often internationally. Some may be contracted and paid by the educational institutions (to perform student recruitment for them) while others have no affiliation with the institution and are paid by the prospective students. Contracted agencies are typically accredited, i.e., these agencies have passed a quality assurance process by an official body such as **ICEF** or **AIRC**. Agents who are unaffiliated with educational institutions and may be unaccredited can be referred to as independent, unofficial, or “wild” agents.

Educational export: Service exports related to education, training and competence, such as selling education solutions abroad and training foreign degree students, as well as goods exports, such as the export of physical learning materials or environments abroad.⁵

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⁴ HE 143/2025 vp, 4.

⁵ Finnish National Agency for Education 20 Oct 2022.

Grievance: a concern or complaint raised by an individual or group who feels they have been treated unfairly or harmed, based on law, contractual commitments, established practices, or general notions of fairness. In the context of the UNGPs, grievances are handled through **grievance mechanisms**, which are formal processes, whether state-based or non-state-based, that allow people to raise concerns about business-related human rights impacts and seek remedy.

Higher education institutions (HEIs): A higher education institution is a university or a university of applied sciences that provides tertiary education. Higher education institutions can be public or private. They typically offer study programmes and facilitate research in various fields and can award academic degrees. In Finland, there are 37 higher education institutions: 13 universities and 24 universities of applied sciences.⁶

Human rights due diligence: processes through which businesses identify, prevent, mitigate, and account for their potential and actual negative human rights impacts.

International students: For the purposes of this report, the term international students refer to incoming students from outside the EU/EEA, unless otherwise specified.

Labour exploitation: A situation in which a (migrant) worker is subjected to poor conditions such as insufficient wages, overly long working hours, and/or work in an unsafe environment, and has little possibility of changing the situation. The perpetrator is typically motivated by financial gain.⁷

Remedy: actions taken to stop the harm, address its impacts, and, as far as possible, restore the affected person to the situation they would have been in had the harm not occurred. When full restoration is not possible, remedy involves compensation and formal acknowledgement of the harm.

Rightsholder: any person or group whose human rights may be affected by a business's activities, products, or decisions. Under the UN Guiding Principles on Business and Human Rights (UNGPs), rightsholders include individuals and communities that have internationally recognised human rights, and whose protection and wellbeing form the basis for due diligence and remediation efforts.

Risk: the possibility that an action, decision, or situation will lead to negative impacts on individuals or groups. In the

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⁶ Ministry of Education and Culture. n.d.(a).

⁷ See e.g., Jokinen & Ollus 2019.

context of the UNGPs and human rights due diligence, risk focuses on the likelihood and severity of harm to rightsholders.

Trafficking in human beings: The recruitment, transportation, transfer, harbouring, or receipt of persons, by means such as threat, use of force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or giving/receiving payments or benefits to obtain control over another person, for the purpose of exploitation, which may entail forced labour or sexual exploitation.⁸

UN Guiding Principles on Business and Human Rights (UNGPs): the global framework that sets out how states and businesses should prevent, address, and remedy human rights impacts linked to business activities. UNGPs are built on three pillars: the state duty to protect human rights, the corporate responsibility to respect human rights, and the need for access to remedy when harm occurs.

University of applied sciences: Universities of applied sciences offer bachelor's and master's degrees. The educational institutions cooperate closely with businesses and industries, and the education is aimed to meet the evolving needs of the labour market.⁹

Upper secondary education: General upper secondary education comprises on average three (to four) years of education following primary and lower secondary education. Its purpose is to strengthen general knowledge and prepare for future studies. Upper secondary education consists of 150 credits, composed of compulsory and optional studies.¹⁰ The studies lead to the matriculation examination (in Finnish: ylioppilastutkinto).

Vocational education: Vocational institutes offer vocational education and training (VET). There are three types of qualifications: vocational upper secondary qualification, further vocational qualification, and specialist vocational qualification. Vocational upper secondary qualification gives students broad basic professional skills for various tasks within an industry and includes 180 competence points.¹¹

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⁸ UN Protocol to Prevent, Suppress and Punish Trafficking in Persons Especially Women and Children, supplementing the United Nations Convention against Transnational Organised Crime.

⁹ Studyinfo n.d. (a).

¹⁰ Finnish National Agency for Education n.d.

¹¹ Studyinfo n.d. (b).

Part I

Setting the scene

This section introduces the background and the scale of the presence of non-EU/EEA students in higher education institutions in Finland and, to a lesser extent, in the other Nordic countries. Key issues such as tuition fees and students' residence permits are discussed in dedicated subchapters.

WE ALSO PROVIDE AN overview of the phenomena of international students in upper secondary and vocational education, as well as in commissioned education. Part I is based on desk research drawing on policy documents, academic literature, research reports, and journalistic sources. The structure of the report allows readers to navigate directly to the sections that are most relevant to their interests, without needing to read the report in its entirety. If you are interested in the findings, please go directly to part II. The topic of human rights due diligence in (higher) education is discussed in part III.

The population in the Nordic countries is aging, and birth rates remain low¹². This has created an increased need for immigration in the form of international students and migrant workers. The need is particularly pronounced in Finland, which has the oldest population of the Nordic region.¹³ Etna Economic Research Institute has calculated that Finland alone would need a yearly net migration of 44,000 people to stabilise the size of the country's labour force.¹⁴

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¹² Nordic Council and the Nordic Council of Ministers n.d.

¹³ Nordic Health & Welfare Statistics 2025.

¹⁴ Alho et. al. 2023; referred to also in Yle 3 Feb 2023.

Similarly, educational institutions have been affected by the shrinking age cohorts. In Finland, this has coincided with cuts in government funding for higher education institutions since 2015, most recently during the current government period 2023–2027.¹⁵ These developments have contributed to educational institutions turning to commercialising education and offering education to fee-paying international students.

Higher education institutions engage in internationalisation because fee-paying students contribute to their financing, international talent is considered important for improving the quality of research and teaching, and because attracting and retaining international students is a means to address labour shortages at Finnish companies and in the public sector.¹⁶

In addition, internationalisation supports international funding and investment.

The current vision for the internationalisation of higher education and research by the Ministry of Education and Culture emphasises that by 2035 Finland is attractive and competitive, as well as responsible and welcoming to international talent.¹⁷ However, the current funding model for higher education institutions does not include internationalisation as an explicit funding criteria.¹⁸

Internationalisation efforts are supported by government-run programmes, such as **Education Finland**, which offers Finnish educational know-how and learning solutions globally, and **Study in Finland**, which advertises and guides international students on how to apply for bachelor's and master's degree programmes taught in English in Finland. The Ministry of Economic Affairs and Employment and the Ministry of Education and Culture also coordinate a program called Talent Boost with the aim of increasing the number of international professionals in the Finnish labour market and bridging the gap between education and employment in

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¹⁵ ICEF Monitor. 19th Jun 2015.

¹⁶ Nielsen et al. 2023, 48.

¹⁷ Ministry of Education and Culture n.d. (b).

¹⁸ Ministry of Education and Culture 11 Apr 2024.

Finland.¹⁹ Furthermore, “increasing the number of foreign students in a controlled manner” was proposed by the Room for Growth working group, which was appointed by the Finnish Prime Minister in 2024 for the purpose of coming up with ways to promote sustainable economic growth in Finland.²⁰

The number of non-EU/EEA students in Finland has grown in the last few years, which is illustrated by the increase in the number of residence permits granted for studies. Graph 1 below shows a slight decrease in permits following the introduction of tuition fees in higher education for international students in 2017 and a more pronounced one at the onset of the COVID-19 pandemic in 2020. However, since then, the number of permits granted has increased sharply, with over 12,000 first permits for studies granted in 2023 and 2024.

Educational institutions argue that bringing in international students to Finland is not primarily a profit-driven endeavour. However, as Finnish age cohorts shrink, having fewer and fewer students each year will inevitably affect the financing of educational institutions. Fewer graduates mean smaller state subsidies, as well as a need for fewer employees. At the same time, the distribution of state funding is likely to require restructuring as the proportion of the population at retirement age continues to increase. Educational institutions, however, also emphasise that tuition fees paid by international students provide funding that is also needed to ensure high-quality education for the Finnish students.²¹

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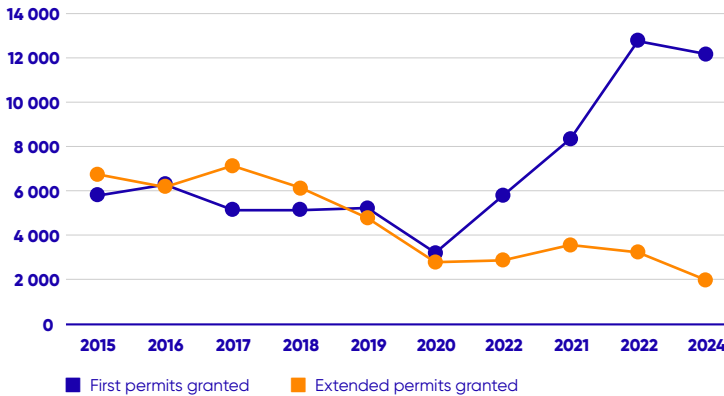
¹⁹ Ministry of Economic Affairs and Employment 21 Nov 2023.

²⁰ Finnish Government 2025, 14, 32.

²¹ Helsingin Sanomat 7 Oct 2025.

Graph 1. Resident permits granted for studies by the Finnish Immigration Service in 2015–2024.

Resident permits granted for studies in Finland 2015–2024



SOURCE: Finnish Immigration Service.

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Higher education institutions

IN THE PAST TEN years, the Finnish higher education system has gone through several policy and legislative changes, including the introduction of tuition fees for international students, changes in the terms of student residence permits, and recently, the requirement of higher education institutions to charge full-cost tuition fees. Below, we will briefly present some of these changes and their effects on student migration, as well as touch on recent developments in the other Nordic countries.

Tuition fees

BEFORE 2010, DEGREE PROGRAMMES in Finnish higher education institutions were free of charge for all Finnish and international students.²² With the Universities Act (558/2009) of 2009, the autonomy of higher education institutions increased and they were expected to diversify their funding base.²³ Tuition fees were piloted in 2010–2014 by allowing higher education institutions to charge fees from non-EU/EEA students admitted into foreign-language Master’s programmes. In 2015, provisions

²² Ministry of Education and Culture 2022, 11–12.

²³ See e.g., Ampuja & Horowitz 2024, 306.

regarding tuition fees were added to the Universities Act (1600/2015: 10 §) and the Universities of Applied Sciences Act (1601/2015: 13 a §).²⁴

The debate on the introduction of tuition fees was based on different developments, such as the increase in the number of international students, and the fact that many countries, such as Denmark and Sweden, were charging fees from (non-EU/EEA) students.

The growing number of international students, in part, resulted in calls for broadening the funding base of higher education. The government proposal 77/2015 stated that Finland could not meet the growing educational demand from developing countries by increasing the amount of free education while significant cuts were being made to public funding for education at the same time. Furthermore, Finnish higher education institutions were given the opportunity to participate in educational export activities, including selling degree programmes to international students.²⁵

According to the 2015 tuition fee provisions, higher education institutions were to charge a tuition fee of at least €1,500 per academic year from non-EU/EEA students²⁶ for degree programs leading to a Bachelor's or Master's degree conducted in a language other than Finnish or Swedish.²⁷ Higher education institutions were able to determine the amount of tuition fees and they varied between institutions and even between different programs within the same institution. Tuition fees did not initially impact the core funding of higher education institutions, rather, the fees were intended as additional funding to improve the quality of education and support services. The institutions also gave out scholarships or waived fees.

²⁴ The provisions came into force at the beginning of 2016, and higher education institutions became obligated to charge fees from students who started their studies on or after 1 Aug 2017.

²⁵ HE 77/2015, 4.

²⁶ Exempt are also individuals who based on agreements are equated to EU citizens, individuals holding a Blue Card, a continuous or permanent residence permit, or an EU residence permit for third-country nationals who have resided in the EU for a long period, and the family members of aforementioned individuals (HE 51/2024).

²⁷ HE 51/2024, 4.

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From 1 August 2026 onwards, however, tuition fees were to cover the full cost incurred from providing the education.²⁸ This aligned with the provision in the current Government Programme of Prime Minister Orpo, stating that “the government will move towards full cost coverage of tuition fees for students from outside the EU and EEA countries”. According to Government Proposal 51/2024, the aim of introducing full-cost coverage is to reduce the costs to public finances arising from the education of higher education students who are liable to pay tuition fee. Thus far, tuition fees have not had a significant impact on the financing of higher education institutions, nor have they covered the full costs of education in most institutions.²⁹ Based on estimates presented in the Government Proposal, the number of international students liable to pay tuition fees may reduce by one third after the implementation of the full-cost fees.³⁰

The number of non-EU/EEA bachelor’s and master’s degree students in Finnish higher education institutions has risen significantly over the last years. In 2022, there were approximately 16,100 students from outside the EU. In 2023, the figure had climbed to 21,100, and in 2024, to 26,100.³¹ Non-EU/EEA citizens still form a clear majority of new international students in higher education. Compared to other EU countries as well as other Nordic countries, Finland has a higher-than-average number of students from Asia and fewer students from other European countries.³² Student visa applications also reflect this: in 2024, nine out of the ten largest applicant nationalities were from Asia.³³

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Table 2. Top 5 countries of origin among persons who have received a study-based residence permit in 2020–2024.

2020	2021	2022	2023	2024
Russia, China, Vietnam, Pakistan, Nigeria	Russia, China, India, Nigeria, Bangladesh	Russia, China, Bangladesh, India, Vietnam	Bangladesh, Sri Lanka, China, India, Nepal	Bangladesh, Nepal, Sri Lanka, India, China

SOURCE: Finnish Immigration Service.

²⁸ Ibid., 5, 9, 18.

²⁹ HE 51/2024, 17.

³⁰ Ibid., 20.

³¹ Vipunen, Education Statistics Finland. Retrieved 4 Feb 2026.

³² Ibid., 7; OECD 2021.

³³ Finnish Immigration Service 2025.

According to the final report of the Monitoring and Evaluation Working Group on the Introduction of Tuition Fees in Higher Education Institutions published in 2022, the introduction of tuition fees had no negative long-term effects on the internationalisation of higher education institutions nor on the willingness of non-EU/EEA students to study in Finnish institutions.³⁴ Nevertheless, nearly half of the fee-paying students surveyed by the working group were unsure whether their study programme was worth the tuition fee. Many had experienced financial trouble and wanted to take on paid employment while, at the same time, progress quickly in their studies.³⁵

In 2025, however, it was reported that the number of applicants in the first joint application to degree programmes taught in English at Finnish higher education institutions halved in comparison to 2024: from 63,000 applicants in 2024 to 32,400 in 2025. The largest nationality groups among the applicants were Finnish (25% of the applicants), Nigerian (13%), Bangladeshi (9%), Pakistani (8%) and Nepalese (6%). In 2024, the largest nationalities were Bangladeshi (18%), Finnish (15%), Pakistani (14%), Nigerian (11%) and Nepalese (8%).³⁶

The number of international students in Finland is influenced both by factors that make Finland an attractive country for potential students as well as factors that encourage emigration from countries of origin. These factors are highlighted in table 3.

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Table 3. Structural factors influencing the number of international students in Finland.³⁷

Factors related to Finland as the country of destination	Factors related to the countries of origin that potentially drive migration
<ul style="list-style-type: none"> The number of study places offered by educational institutions Finland's attractiveness as a country to study and live in International competition over the recruitment of students The growth of educational export and different forms of study Tuition fees (in the longer run) 	<ul style="list-style-type: none"> Living standards in the country of origin Economic development Employment opportunities Discrimination Conflicts and natural disasters

³⁴ Ministry of Education and Culture 2022; for further reading on the effect of levying tuition fees, see also Mathies, Karhunen & DesJardins 2025.

³⁵ Ministry of Education and Culture 2022, 81.

³⁶ Finnish National Agency for Education 23 Jan 2025.

³⁷ See e.g., Finnish Immigration Service 2025.

Since 1 January 2025, applicants from outside the EU, EEA or Switzerland have been required to pay an application fee of €100 to apply to Bachelor's or Master's level studies in Finland. According to the Finnish National Agency for Education (OPH), the implementation of application fees can be seen as one factor for the decreasing numbers of applicants. For example, the number of Bangladeshi applicants dropped by over 5,000.³⁸ The aim of introducing the application fee was to lower the number of low-quality applications and eliminate candidates who were not necessarily serious about applying and studying in Finland, thereby also easing the workload of those processing the applications.

Some higher education institutions noticed that an increasing number of students switched to another residence permit type after starting their studies and suspected that the reason for this was to circumvent tuition fees, as persons with a residence permit for a purpose other than studies were not obligated to pay tuition fees. The most common residence permit type applied for in these cases was the employee's residence permit. The Universities Act and Universities of Applied Sciences Act were amended in 2024 in order to safeguard tuition fee revenue and support educational institutions' strategic operations by maintaining the students' obligation to pay tuition fees even if they changed the grounds of their residence permit.³⁹

Finnish higher education institutions continue to raise interest particularly in Southeast Asia.

Helsingin Sanomat reported in January 2026 on South-Eastern Finland University of Applied Sciences (Xamk) and its Bachelor's of Business Administration (BBA) degree program. Nearly all of the students in the program are from Asian countries such as Pakistan, Nepal, India, Sri Lanka and Bangladesh. In the joint application of autumn 2025, 1,062 persons applied, 1,041 of whom from outside Europe. Around 60 students, 6% of all applicants, were admitted. The popularity of Xamk and a few other institutions mentioned in the article may have to do with the fact that applicants can take the entrance exam remotely in their home country.⁴⁰ Some institutions also admit

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³⁸ Ibid.

³⁹ HE 51/2024, 3.

⁴⁰ For some degree programmes, international applicants can attend an entrance exam online through the [UAS Exam platform](#). Applicants have to verify their identity with a passport or a biometric EU/EEA identity card.

students based on their prior academic record alone. Over 60 new students accepted a study place at Xamk starting in spring 2026, but only 14 were present in the orientation in January. According to a Xamk representative this is not out of the ordinary: many have not received a decision on their residence permit yet, because the process can take anywhere from a few months to a year. The estimated number of students who will eventually show up is 35–40.⁴¹

Other Nordic countries

NOT ALL OF THE other Nordic educational institutions charge tuition fees, however, most do or have the possibility to do so. Denmark was the first Nordic country to introduce tuition fees for non-EU/EEA students in higher education in 2006. The number of international students dropped right after the introduction of the fees, but rose significantly a couple of years later, mainly due to a widespread scholarship system and marketing efforts.⁴² Swedish higher education institutes also introduced tuition fees for non-EEA/Swiss students already in 2011. The basis for the reform stemmed from the increasing costs of administration and education.

Delmi, the Delegation for migration studies, examined the consequences of the introduction of tuition fees and the composition of international students in Sweden in 2019. Their report showed that the number of third country students, especially from less wealthy and democratic countries, declined significantly. The decrease took place particularly in the fields of science and technology, which was seen as a challenge for the country's workforce needs. The number of students in the fee-paying group initially dropped by four-fifths. Although the number then began to grow steadily and scholarship schemes were introduced, the total number of registered international students had fallen by 12,500 four years after the tuition fee reform.⁴³

Norway introduced tuition fees in higher education in 2023 and saw an 80% drop in the number of new students from outside the EEA or Switzerland. According to Norwegian universities, the combination of tuition fees and the high cost of living

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⁴¹ Helsingin Sanomat 23 Jan 2026.

⁴² Oxford Research 2013, 11–12.

⁴³ Bryntesson & Börjesson 2019.

made it difficult to recruit international students. In 2025, the Norwegian government removed the requirement of full cost tuition fees for non-EEA/Swiss students: higher education institutes can now freely decide how much to charge them.⁴⁴

Iceland does not charge tuition fees in public universities. However, Icelandic media sources reported in 2025 of a 40% increase from 2024 in the number of applications for student visas/residence permits, amounting to an additional 209 applications.⁴⁵ The increase stemmed mainly from applicants from Nigeria, Pakistan and Ghana: in 2022, there were 24 applications from these three countries, followed by 142 applications in 2024, and 304 applications in 2025, while the number of applicants from other countries remained more stable. The media source suggests that the increase in applications from Nigeria, Pakistan and Ghana may result from TikTok content about studying in Iceland, or, from Finnish universities starting to charge higher fees from non-EU/EEA students thus resulting in “spillover” to Iceland, the last Nordic country without university tuition fees.⁴⁶ A university representative interviewed by Oxford Research already in 2013 had noted an increase in applications already after Denmark and Sweden introduced tuition fees, stating that they had begun receiving more applicants from developing countries “who cannot afford to study in countries with tuition fees”.⁴⁷

The Icelandic Directorate of Immigration reportedly had difficulties in processing the permit applications in 2025 due to their increased number as well as the fact that 38% of the applications were sent in after the 1 June deadline. According to the media source, a key issue was that many applicants of the University of Iceland did not receive a confirmation on their admission until late May, which made it impossible to acquire and physically mail the appropriate paperwork to the Directorate by the beginning of June. In some cases, the delays in visa processing have allegedly resulted in the revocation of admissions based on the students not having a residence permit by the start of the term.⁴⁸ Nordic practices regarding tuition fees are outlined in the following table.

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⁴⁴ Regjeringen.no 17 Jun 2025.

⁴⁵ Reykjavik Grapevine 21 August 2025; 13 Sep 2025.

⁴⁶ Reykjavik Grapevine 13 Sep 2025; see also Ministry of Justice of Iceland 2025, 28.

⁴⁷ Oxford Research 2013, 21.

⁴⁸ Ibid.

Table 4. Tuition fees of non-EU/EEA students in higher education in the Nordic countries.

	Finland ⁴⁹	Sweden ⁵⁰	Norway ⁵¹	Denmark ⁵²	Iceland ⁵³
Tuition fees in higher education (estimate/range)	€8,000–€20,000	SEK 80,000–295,000 (~€7,200–26,800)	Not required, HEIs decide	DKK 45,000–120,000 (€ 6,000–16,000)	No tuition fees in public universities, only an annual registration fee
Annual income requirement for students (not including family members)	€9,600	2025: 127 008 SEK (~€11 520)	166,859 NOK (~€14,375)	85 032,00 DKK (~€11 385)	2 970864 ISK (~€20,983)
Working while studying	30h/week	No official limit	20h/week, full time during holidays	90h/month, full time in June, July & August	22,5h/week, full time during holidays
Length of job seeker's residence permit after graduation (in years)	2	1	1	0.5–3	3

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Upper secondary schools and vocational schools

A MORE RECENT DEVELOPMENT in Finland is the recruitment of students from abroad to Finnish upper secondary schools (high schools) and vocational schools. This trend is fuelled by the increasing international marketing of Finnish education and, particularly in vocational education, by a growing labour shortage that authorities seek to address by attracting students from abroad. Conditions in countries of origin such as living standards, economic and labour market factors, and political

⁴⁹ Study in Finland n.d.; Finnish Immigration Service n.d. (a).

⁵⁰ Study in Sweden n.d.; Swedish Migration Agency. n.d.

⁵¹ Norwegian Directorate of Immigration n.d.; Study in Norway n.d.

⁵² Study in Denmark. n.d.; New to Denmark 3 Sep 2025 (a) & (b).

⁵³ Study in Iceland. n.d.; Icelandic Directorate of Immigration. n.d. (a) & (b).

situations also make Europe an appealing destination for students from e.g. Southeast Asian countries.⁵⁴

The provision of vocational education in English has expanded as the Ministry of Education and Culture has granted permissions to vocational schools to organise qualifications in various fields in English. In spring 2025, 30 education providers had the right to offer a total of 92 qualifications in English, with just under 2,000 students enrolled. English-language vocational qualifications were originally intended to meet the needs of the foreign-language population already living in Finland, but due to labour shortages and international recruitment, changes to these permissions have also been justified by the arrival of students from abroad. In addition, a vocational education pilot began on 1 January 2026, which gives participating educational providers relatively free rights to offer education in English. This is anticipated to increase the number of applicants from third countries for English-language qualifications funded through state subsidies.⁵⁵

While international vocational students are mainly adults, the recruitment of upper secondary students concerns minors. The upper secondary school students are 15 to 18 years old, and many come from countries such as Uzbekistan, Vietnam, Myanmar, Thailand, China and Iran.⁵⁶

Most of them have come to Finland with the help of one specific company and attend upper secondary schools in small Finnish municipalities. The company in question charges a €2,500 annual marketing fee from the participating municipalities. The company organises pre-departure language and preparatory courses in the countries of origin as well as language tuition in Finland, but student admission must legally be done by the upper secondary schools.⁵⁷ The state of Finland is not involved in the venture. However, municipalities have received central government transfers for upper secondary education based on the number of students. So far, only a few hundred students

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⁵⁴ HE 143/2025 vp, 12.

⁵⁵ Ibid.

⁵⁶ Yle 3 May 2024 (a); 17 Feb 2025.

⁵⁷ Yle 17 Feb 2025; Finnish Association of Small Secondary Schools 2023, 2025; as an example, see Sonkajärven kunta 27 Feb 2024.

from outside Europe have come to Finland, although the target has reportedly been in the thousands.⁵⁸

Before arriving in Finland, the students attend a Finnish or Swedish language course because their upper secondary studies will be in Finnish or Swedish.⁵⁹ The company's language tuition comes with a fee: a six-month course may cost up to €14,000 but according to media sources, middlemen have allegedly charged prospective students' families as much as €25,000.⁶⁰ Until the end of 2025, the students did not pay anything for the upper secondary education in Finland, as the education was covered by the municipalities and the state through tax revenue. The company has argued, however, that the project actually saves the taxpayers' money, because the students' education from ages 0 to 15 has been organised and paid for in their country of origin.⁶¹

As outlined in the previous paragraph, the students' families may have paid large sums of money for language courses organised online or in Finland before the start of the studies, so that the students would reach a language proficiency of B1 on the CEFR scale. However, the media has reported that many students have found learning the language more challenging than perhaps initially advertised by the company.⁶² The company utilises local agents in, e.g., China, and some of them have also given misleading information about studying in Finland on social media. For example, some families have reportedly thought that the initiative is organised by the Finnish state.⁶³

Proponents of the project have framed it as a way to keep small upper secondary schools in rural Finland alive.⁶⁴ Furthermore, the students potentially continuing their tertiary studies and getting jobs in Finland is seen as a response to the country's aging population challenge.

Nevertheless, a working group by the Ministry of Education and Culture prepared a proposal to introduce full-cost tuition

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⁵⁸ HE 143/2025 vp, 12; Yle 3 May 2024 (b).

⁵⁹ NB. Starting in autumn 2026, upper secondary schools can offer upper secondary tuition in English (Finnish National Agency for Education 24 Mar 2025). Furthermore, the International Baccalaureate (IB) diploma programme which is completed in English has been available in Finland since 1990, but the more recent phenomenon of recruiting international students has mainly been related to Finnish/Swedish upper secondary education.

⁶⁰ Iltalehti 10 Jun 2025.

⁶¹ Yle 17 Feb 2025.

⁶² Helsingin Sanomat 25 Nov 2023; 26 Nov 2023

⁶³ Ibid.; see also Iltalehti 9 Jun 2025; Tejuka 11 Sep 2025.

⁶⁴ See e.g., Yle 21 Jan 2021; Yle 17 Feb 2025; Helsingin Sanomat 25 Nov 2023.

fees for students coming to Finland from outside the EU/EEA to pursue vocational education and training⁶⁵ or upper secondary school education. Many upper secondary schools expressed criticism over the proposal in the media, as it might lessen foreign students' interest in coming to Finland and lead to the schools being too small to sustain.⁶⁶ One of the working group's objectives was to tackle the unwanted side effects of international student recruitment. Rectors contacted by Yle argued, however, that they had not witnessed any such side effects.⁶⁷

The Government issued the legislative proposal on the matter in October 2025, and the legislative amendments will take force on 1 August 2026.⁶⁸ From then on, students from outside the EU in Finnish upper secondary or vocational education will no longer be included in the system of central government transfers to local government, rather the cost of their education will be covered by tuition fees.⁶⁹

Commissioned education

COMMISSIONED EDUCATION IS PART of higher and upper secondary education institutions' educational export. Its purpose is to enable the sale of degree education on commercial terms to meet the various needs of a client.

Commissioned education can be commissioned and paid by a company, a state or a public organisation, an international organisation, or a foundation.

The organisation of commissioned education – including its structure, content, schedule and location – is based on an agreement between the educational institution and the client. The institution can decide independently what kind of content it sells and to whom. Normal admission regulations do not

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⁶⁵ The fees do not apply to students who attend apprenticeship training in vocational education and training and have a residence permit based on work (Ministry of Education and Culture 9 Oct 2025).

⁶⁶ Yle 25 Apr 2025; 16 May 2025.

⁶⁷ Yle 14 May 2025.

⁶⁸ Ministry of Education and Culture OKM004:00/2025; Ministry of Education and Culture 9 Oct 2025.

⁶⁹ HE 143/2025 vp; Ministry of Finance 2025.

apply to participants in commissioned education, instead, the student group is primarily selected by the client.⁷⁰

Finnish higher education institutions have been able to offer commissioned education since 2008, first to non-EU/EEA students, and since 2019, to EU/EEA students as well.⁷¹ Vocational education institutions have been allowed to provide commissioned education to non-EU/EEA students since 2018, and, following legislation entering into force on 1 August 2026, they will also be able to offer it to students from EU/EEA countries.⁷² In commissioned education, the educational institution charges the full cost of the education from the client, who, in the case of non-EU/EEA students, may then charge the students. Educational institutions themselves do not charge tuition fees from students participating in commissioned education.⁷³

In 2024, the law governing universities and universities of applied sciences was amended (see HE 51/2024), and the amendments came into effect on 1 August 2025. The aim was to clarify that higher education institutions need to ensure that commissioned education agreements define the rights and responsibilities of participating students and that the students are aware of them. It was also clarified that commissioned education cannot be organised if the client’s purpose is to make profit through the recruitment of students (658/2024: 9 §; 659/2024: 13 §).⁷⁴

It was also outlined that higher education institutes cannot provide commissioned training, if the client does not have “genuine interest in the education and ensuring the students’ legal protection and training”. Moreover, acceptable interest of a client cannot be “general interest, such as obtaining workforce for sectors with labour shortages or improving the position of individuals from disadvantaged economic or social backgrounds”. Intermediaries or agents can still be used to market the education, but they cannot act as the clients.⁷⁵

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⁷⁰ HE 51/2024, 14–15; HE 143/2025 vp, 6.

⁷¹ Act Amending the Universities Act (1504/2007); HE 143/2025 vp.

⁷² HE 143/2025 vp; Act on Vocational Education and Training (531/2017). Upper secondary schools have also been able to organise commissioned education leading to an International Baccalaureate (IB)–diploma since 2019, but this seems to be quite rare (HE 143/2025 vp, 10) and will not be dealt with in this review.

⁷³ Ministry of Education and Culture 2022, 11–14.

⁷⁴ HE 51/2024, 14–15; Act Amending the Universities Act (658/2024); Act Amending the Universities of Applied Sciences Act (659/2024).

⁷⁵ Ibid.

The government proposal (HE 51/2024) gives an example of an acceptable scheme, where a consultancy or an agent could be used to market the training program and find potential students, after which an acceptable client, such as a Finnish welfare county, would choose the students. The education provider would make the contract with the welfare county, and the potential payments would be made from the students directly to the welfare county, without any intermediaries in between. The aim is to protect the students from unscrupulous for-profit intermediaries acting as clients of commissioned education, who have, in the past, recruited students to Finnish educational institutions and (over)charged them for their studies – without securing the students’ rights.⁷⁶

Upcoming legislative changes outlined in the Government Proposal 143/2025 include introducing tuition fees for non-EU/EEA students in general upper secondary education and vocational education and training, and the possibility to sell commissioned vocational education for EU/EEA students. The proposal also stipulates that the rights and obligations of students in commissioned education should be agreed upon more carefully through contracts between the clients and the educational institutions, and that the educational institutions must inform the students of their rights and obligations.⁷⁷

Residence permits of students and their family members in Finland

INTERNATIONAL STUDENTS WHO COME to Finland to pursue a higher education degree will be granted an A permit, that is, a continuous residence permit, which is valid for four years. Other students, such as students in vocational education, will get a B permit, which is valid for one year and can be extended thereafter. The student’s family members will get the same type (A/B) of permit as the student. With both permits, the applicants can be assigned a municipality of residence, but with permit type B there are more conditions that need to be met.⁷⁸ Not having a municipality of residence affects, e.g., access to social and health care services.

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⁷⁶ HE 51/2024, 14–15.

⁷⁷ HE 143/2025 vp.

⁷⁸ Finnish Immigration Service n.d. (b).

The Finnish Immigration Service stipulates that students coming to Finland must have sufficient funds at their disposal to cover their living expenses.

Currently, the required sum is €800 per month. The student must attach a bank statement to their residence permit application showing that there is enough money in their account to cover the first year of studies. They also either have to attach documentation of a paid tuition fee, or if the fee is yet to be paid, have enough money for the fee in their account. Sponsorship agreements provided by family, friends or employers are not accepted. If the educational institution offers, e.g., free accommodation, the required monthly sum is lower.⁷⁹

Those who hold a students' residence permit are allowed to work in any field for an average of 30 hours per week. During holidays, for instance, it is possible to work full-time, as long as the average working hours do not exceed 30 hours per week at the end of the year. However, the work may not slow down studies, that is, the student's studies must still progress at a normal pace. The 30-hour limit is not applied to internships that are a part of the student's degree.⁸⁰

Students' family members can apply for a residence permit in Finland. Family members can currently apply for a residence permit with the student, however, the Finnish Government outlined in late 2025 that the law shall be amended so that a student's family can only move to Finland one year after the student.⁸¹

The spouses have an unrestricted right to work, pursue a trade, and study in Finland. The requirement of having sufficient funds applies to the whole family, e.g. in the Helsinki metropolitan area, the monthly required sum would be €2,500 for a family consisting of two parents and two underaged children. The processing of students' residence permits is prioritized, so

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⁷⁹ Finnish Immigration Service n.d. (a).

⁸⁰ Ibid., Finnish Immigration Service n.d. (b); Act on the Conditions of Entry and Residence of Third-Country Nationals on the Basis of Research, Studies, Training and Voluntary Service (719/2018); Section 14 (277/2022).

⁸¹ Ministry of Economic Affairs and Employment 18 Dec 2025.

it is possible that family members receive their residence permit decisions later than the student.⁸²

The so-called post-monitoring of permits is implemented through technical changes introduced by the Finnish Immigration Service’s AURA project (Enabling automated decision-making and subsequent permit control) which took place 2022–2025. The changes will make it possible to run automatic checks across various official registers to monitor whether the student’s livelihood has been secured during their stay in the country. If necessary, the existence of funds will be verified by requesting information directly from the student.⁸³

Applying for social assistance is very rare among international students. The Finnish Immigration Service receives information from the Social Insurance Institution (Kela) on the use of basic social assistance. Previously, a one-off use of social assistance has not led to the cancellation of residence permits. Currently, a draft law is under public consultation that would allow a studybased residence permit to be cancelled even after a single use of social assistance.⁸⁴

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⁸² Finnish Immigration Service n.d. (c); see also Act on the Conditions of Entry and Residence of Third-Country Nationals on the Basis of Research, Studies, Training and Voluntary Service 719/2018; Section 16 (277/2022).

⁸³ HE 51/2024, 10; Finnish Immigration Service n.d. (d).

⁸⁴ Ministry of Economic Affairs and Employment 16 Jan 2026; 2024 (TEM013:00/2024); Helsingin Sanomat 23 Feb 2026.

Timeline: Changes in the Finnish legislation regarding international students after 2015

Higher Education

2015 Tuition fee provisions added to Universities Act and UAS Act: ≥ €1,500/year for non-EU students in English-language degree programs.

2016 Application processing fee (100€) introduced for non-EU/EEA applicants.

2017 Application fee removed when tuition fees were implemented.

2022 Law amendments: Student residence permit granted for the full duration of studies; foreign students' right to work 25–30 h/week; graduates eligible for a two-year jobseeker's permit; foreign students required to provide proof of subsistence for one year only.

2024 Tuition fee liability remains for non-EU/EEA students even if their residence permit-type changes (e.g. to an employment-based permit).

2025 Application fee reintroduced for non-EU/EEA applicants via Finnish National Agency for Education. The aim is to reduce the number of poorly prepared and low-quality applications that burden higher education institutions, while still encouraging students to apply to study in Finland.

Upcoming
Recipients of temporary protection exempted from tuition fees.

2026 Tuition fees must cover full cost of education for non-EU/EEA students.

2015

2016

2017

2018

2019

2020

2021

2022

2023

2024

2025

2026

2017 Old Upper Secondary Schools Act repealed.

2019 New Upper Secondary Education Act (714/2018) enters into force.

2018 Act on Vocational Education and Training (531/2017) gave vocational institutes the opportunity to provide commissioned education to non-EU/EEA students.

2025 Commissioned education restricted if the intent is only to make a profit by channelling students into degree education.

2026 Finnish upper secondary education and matriculation exam can be completed in English. Introduction of tuition fees in upper secondary and vocational education for non-EU/EEA students.

Secondary Education

Recent Finnish Government policy decisions regarding international students⁸⁵:

- **THE ENTRY OF STUDENTS' FAMILY MEMBERS** will be deferred, allowing family reunification only after the student has resided in Finland for one year.
- **THE INCOME REQUIREMENT** for student residence permits will be clarified by including the minimum income directly in legislation, replacing the current guideline-based approach applied by the Finnish Immigration Service.
- **RESTRICTING THE USE OF AGENTS** will be examined, allowing only agents who have contractual relationships with higher education institutions.
- **A LANGUAGE PROFICIENCY REQUIREMENT** will be introduced as part of the student residence permit criteria.
- **UPPER SECONDARY STUDENTS** and all family members of students will in the future be subject to the refusal grounds under the Aliens Act.

The Ministry of Economic Affairs and Employment will begin to work on the legislative amendments in early 2026.⁸⁶

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⁸⁵ Ministry of Economic Affairs and Employment 18 Dec 2025.

⁸⁶ Ibid.

Part II

Findings: The path of international students from the country of origin to Finland – what are the risks along the way?

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The following sections present the potential challenges or risks that international students arriving in Finland may face. The issues are presented so that they follow the students' journey, beginning with potential risks before arriving in Finland, then during their studies in Finland, and finally, after the studies.

THIS SECTION BUILDS UPON the empirical materials collected in our project. The focus is on Finland, but examples from the other Nordic countries are presented when relevant. Case examples are also included to illustrate specific issues.

The emphasis of the analysis is on the risks of labour exploitation and human trafficking. While such exploitation of international students may not yet have been uncovered or identified at length in the entire Nordic region, it is an issue that raises concern, as the subsequent chapters will show. Furthermore, this scoping review shows that most of the more severe challenges faced by international students in Finland boil down to economic hardship.

The international students covered in this scoping review come from a variety of countries and backgrounds. However, in the Finnish context most of the risks seem to concern students from Asian countries with significant differences in levels of economic development in comparison to Nordic countries. This is of course related to the fact that the vast majority of students come from Asian countries but is also linked to e.g. irregular recruitment practices that seem particularly prevalent in the Asian context, as the subsequent sections will show.

However, it is also important to note that international students often come from middle-class backgrounds in their own countries of origin, as the poorest people usually cannot afford to seek education opportunities abroad. Moreover, intersectional factors such as young age, gender, ethnicity, health, and financial and other dependencies may affect the situation of individual students and increase their exposure to risks of exploitation and trafficking, including re-trafficking.⁸⁷

The purpose of part II is to shed light on the phenomenon and to encourage further discussion on how to ensure the sustainability of international student recruitment and the students' wellbeing in Finland and across the Nordic countries. The section concludes with a chapter in which we examine the role of corporate social responsibility in higher education.

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⁸⁷ On exploitation and different intersectional vulnerabilities see, e.g., Palumbo 2023; Nkwanzu et al. 2025; Gordon et al. 2024; Reid et al. 2017.

Risks before arriving in Finland

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In this scoping review, we identified three main reasons that create risks for exploitation prior to the students' arrival in Finland.

FIRSTLY, DISHONEST AGENTS AND other middlemen make false claims and secondly, **inflate the costs** associated with recruitment, pre-departure courses and administrative fees for assistance in applying for a residence permit, organising travel and accommodation, and communicating with the school. These factors place the students at risk of debt and subsequent exploitation. Thirdly, there are risks related to the overall **visa application** process, as well as to the use of the **student visa regime** as an avenue to enter Finland and the Schengen area without the intent to study. There are indications across the Nordic region that student visas are used as means of entry for work or other purposes.

How do educational institutions use recruitment agents?

INTERNATIONAL STUDENTS CAN APPLY to Finnish higher education institutions directly, without the involvement of agents or middlemen. However, agents and middlemen are commonly used by Finnish educational institutions to support the recruitment of international students. 81% of respondents from educational institutions participating in the survey circulated as part of this scoping review said that their institution employs agencies to advertise the institution's study opportunities abroad. 97% of respondents indicated that they engage agents in the country of origin, and 49% stated that they employ agents working in Finland. Educational institutions usually work with accredited

agencies and some share information with one another about their experiences with different service providers. Even accredited agencies can bend the rules, however, as described here:

” There are many large agent networks operating [in Bangladesh], under which individual agents work. These larger networks can be accredited and look perfectly fine on the surface, but underneath they have subcontractors even though our contracts usually state that subcontracting is not allowed, they still use them. I noticed that at least one of these agents, with whom we ended our cooperation a long time ago because it was extremely problematic, and I even contacted the authorities about them, still seems to be operating. But this is a global phenomenon, and there’s no way we can put an end to it from Finland.

– Representative of a higher education institute, Interview 1.

Some educational agents offer larger packages including advisory services for prospective students on where to apply (i.e., to which country, educational institution, or degree program), which may be how the student ends up applying to a Finnish university. In addition, several interviewed education experts mentioned that in some countries, applying to a university through an agency is the norm, and a large fee may be seen as an indication of a high-quality service, application and/or target university. However, it is also possible to apply on one’s own, and persons interviewed for this study emphasised that educational institutions should stress this to applicants and also highlight this on their websites.

In a Laurea master’s thesis on the roles of agents in international student recruitment that used qualitative interviews with seven agents in Africa, Asia and the Middle East, the majority of the interviewed agents reported that students need the most support in assembling applications, translating documents, and managing the visa process.⁸⁸ Several agents

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⁸⁸ Rahtu 2025, 28.

expressed concern that the information students receive is not always sufficiently clear, which can lead to incorrect expectations, for example regarding tuition fees or the duration of studies. They raised the need for better information materials from the educational institutions that take into account the students' cultural background and language proficiency level. Furthermore, some respondents also described situations in which students questioned the accuracy of service fees.⁸⁹

Several of the interviewed actors working with international students ending up in difficult situations in Finland were critical of educational institutions' use of agents.

” They are very quick to bring in students and whoever is offering, they [educational institutions] are really happy to take them. The agents are blamed, and universities do not take any responsibility. I think [educational institutions] are very happy just to take students.

— Integration service provider, Interview 16.

The educational institutions participating in the survey circulated as part of this scoping review all emphasised that they have various processes in selecting agents to ensure they fulfil the requirements (more on the corporate social responsibility measures in part III). However, one respondent stated that their education institution plans to discontinue the use of agents, as they are deemed ineffective, and it is difficult to determine their reliability.

Moreover, also so-called “wild agents” offer services to prospective students. These actors' trustworthiness can be hard for applicants to evaluate. Wild agents have no formal affiliation to educational institutions but may use university logos or even logos of Finnish government ministries to seem more legitimate and gain customers. Educational institutions have tried to tackle the issue by listing the agencies they work with on their official webpages, to encourage students who wish to apply through an agency to contact these affiliated agents. Still, many experts interviewed or participating in the background survey thought that getting rid of wild agents is an impossible task.

⁸⁹ Ibid.

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What are the risks and modus operandi of dishonest agents and other middlemen?

ONE KEY RISK IDENTIFIED in this study is the **misleading or deceptive advertising done by agents or other middlemen in recruiting students** to study in Finland and/or the other Nordic countries. This applies to all types of studies and categories of students. Deceptive recruitment has also been identified as one of the key means of trafficking for the purpose of labour exploitation.⁹⁰ According to research, the majority of victims of labour trafficking are recruited via third-party recruiters, and this is often associated with false promises and deception about the work, salary, and working conditions.⁹¹

The modus operandi of dishonest agents and other middlemen is based on false promises and inflation of costs for various, technically unnecessary services to prospective students to maximise their profits. These factors were highlighted both by interviewed experts and media articles. The identified misleading information includes, e.g.:

- **FALSE** claims that learning Finnish takes no time, or that knowing English is enough;
- **ASSURING** that it is easy to find part-time employment as a way to pay for one's tuition fees and living costs;
- **INFLATING** the prospects of getting a permanent job at the end of or after studies;
- **USING** Finland's reputation in education and as the "happiest country in the world" as selling points;
- **NOT** giving a realistic picture of the actual cost of living.

Furthermore, two interviewed Finnish experts described cases where agents had applied for study places in Finland on behalf of their clients. However, these study places were not for actual degree programmes but for short courses, such as summer courses. Some agents had also loaned money to students with exorbitant interest rates and instructed them to apply for vocational or higher education and, subsequently, for a residence permit for studies only after arriving in Finland. This left some students and their families confused: they had invested, and in some cases borrowed, significant amounts of money for

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⁹⁰ Fletcher & Trautrim 2024, 43–76.

⁹¹ Fabbri, Stöckl, Jones, Cook, Galez-Davis, Gran, Lo & Zimmerman 2023, 629–651.

studies and relocation, only to discover upon arrival that the person had not been, and would not necessarily be, admitted to any degree programme at all. However, it must be noted that this scheme has no longer been possible since September 2024, when applying for the first residence permit from within Finland while staying on a visa was prohibited.⁹²

Misinformation or scams by dishonest middlemen are not uniquely Finnish or Nordic phenomena, rather, similar problems have been encountered all over Europe as well as globally.⁹³ For example, in the United Kingdom, study visa applicants have been contacted by scammers posing as immigration authorities demanding “deposits” as proof of sufficient funds.⁹⁴ The government of Canada warns prospective students of fraud on their website, and has banned unauthorised representatives from helping migrants fill out and submit immigration applications to the country.⁹⁵ In countries such as Canada and USA criminals have abused the international student recruitment system by using forged acceptance letters or even recruitment into made-up universities to scam applicants.⁹⁶

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⁹² See Aliens Act 301/2004: 60 §; Finnish Immigration Service n.d. (e).

⁹³ See, e.g., Financial Times 20 Oct 2024; 11 May 2025.

⁹⁴ UK Visas and Immigration 2025.

⁹⁵ Government of Canada 2025.

⁹⁶ See e.g., University Affairs 17 Sep 2025; Inside Higher Ed 14 Aug 2025.

CASE EXAMPLE 1

Agents misleading prospective students with false promises

THE FINNISH TELEVISION SHOW MOT specializing in investigative journalism released an episode in December 2025 entitled “A Scam Called Finland”, which shed light on the difficult situation of many international degree students in Finland. The journalists had contacted their Indian counterparts and asked them to call some of the agencies affiliated with Finnish higher education institutions, posing as family members of prospective applicants. The Indian journalists asked the agents about living, studying and working in Finland. In the recorded calls, the agents assured that students would not need savings as they could finance their living expenses in Finland with a part-time job, and that knowing Finnish was not a prerequisite for employment. The recordings were played to representatives of two Finnish higher education institutions. They confirmed that the information was misleading and inconsistent with what had been agreed on and stated that they would be in contact with the agencies and if necessary, end their contracts.⁹⁷

The students interviewed for this report also recognised that many applicants are misinformed about, for instance, eligibility for scholarships and social benefits. Moreover, the potential benefits, and even more so, the potential future salaries may seem lucrative at first when translated to a different currency. However, the amount becomes much less substantial when taking into account the high cost of living in Finland.

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⁹⁷ MOT 7 Dec 2025; 8 Dec 2025; see also Yle 8 Dec 2025.

CASE EXAMPLE 2

Exploitation of Bangladeshi students in the Finland

IN 2024, FINNISH MEDIA highlighted the precarious situation of Bangladeshi degree students who struggled with finding a job and some of whom ended up in exploitative labour conditions in, e.g., restaurants in Finland.⁹⁸

The students had initially enrolled in degree programmes in Finnish higher education institutions. Middlemen in Bangladesh had charged them high recruitment fees while giving the students misleading information about the cost of living and employment opportunities in Finland. As a result, many students ended up without means of sustaining themselves and funds to pay their tuition fees. Some sought help from food aid, while others had to agree to any work they could get.⁹⁹

A Detective Chief Inspector from the National Bureau of Investigation commented that crimes committed in the country of origin are difficult, if not impossible, to investigate from Finland. This is particularly the case regarding countries where authorities and agencies may be involved in corruption.¹⁰⁰ According to the investigative article by Hufvudstadsbladet, some of the agencies they came across operated from Finland, too. In one instance, a combined cleaning and agency company in Finland reportedly advertised that students could “buy internships” that “could lead to cleaning jobs”.¹⁰¹

According to a report on Pakistani students by the Swedish Migration Agency, many of the students use agents in seeking education in Sweden, and some may misuse study-based residence permits to work in Sweden rather than study. The Pakistani agents use the possibility of unlimited work in Sweden and the low language requirements as selling points when recruiting students. Swedish higher education institutions employ agents to market their programs but according to the report, their advertising differs minimally from that of the non-contracted agents. Many international students have

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⁹⁸ Hufvudstadsbladet 14 Jun 2024.

⁹⁹ Hufvudstadsbladet 18 Jun 2024 (a).

¹⁰⁰ Hufvudstadsbladet 18 Jun 2024 (b).

¹⁰¹ Hufvudstadsbladet 18 Jun 2024 (a).

ended up in a difficult financial situation in Sweden. Based on the report, there have been indications that students present falsified bank statements showing sufficient funds needed for a residence permit, in some cases fabricated by the agencies.¹⁰² Educational institutions have, however, used agents for well over 10 years, and risks related to agents and the need to choose them carefully were discussed already then in Swedish media.¹⁰³

One of the interviewed international students had used an educational agent to apply for a master's degree in Finland, but said that if she were to apply again, she would do it independently. Based on advertising the student thought she would simply submit her documents to the agent and the agent would take care of everything, but in reality, the student had to fill out all her paperwork herself. Moreover, she had given the agent a list of degree programs to apply to in certain countries, but only later found out that the agent had not applied to all of her top picks.

” If you get accepted, you pay a commission to the agent. I suppose the idea is get the student accepted to some programme, not necessarily the programme that you want. [...] Anytime I hear someone saying oh, we're applying through an agent I've always said no, you don't need to, all the information, you can find it online. It's so easy, you don't have to literally flush down a lot of money. I've heard recently from somebody that an agent charged 7,000 plus euro for applying and that's a lot. That's like one semester's tuition fee here. It's just a waste of time and money.

– International student, Interview 12.

An interviewee working in law enforcement suggested using Finnish embassies abroad to share information through social media on how to apply to Finnish educational institutions. The interviewee stressed that embassies have, overall, an important

¹⁰² Migrationsverket 2022, 11–12.

¹⁰³ Sveriges Radio 6 Aug 2015.

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role in the student recruitment process through checking the authenticity of students' documents, and their resources to do so should be ensured. Furthermore, law enforcement agencies can cooperate with their international counterparts by reporting dishonest agents to the authorities at the country of origin.

CASE EXAMPLE 3

Unreasonable contracts between students and agencies

THE FINNISH EVENING PAPER Ilta-Sanomat reported in 2025 on Indian students studying in Finland who had had to sign contracts with local agencies which stipulated, for instance, that getting pregnant during their studies was prohibited, and that delays in payments of service fees would lead to 800% annual interest rate. The contracts also made discontinuing one's studies very difficult, as it would result in having to make hefty payments to the agency.¹⁰⁴

The agency in question had brokered students into at least four Finnish universities of applied sciences. The agency representative stood behind the contracts, saying that the aim was to ensure that the students commit to their studies and complete them. They also argued that a student's choices could impact the whole group, if, e.g., they would drop out and the others' tuition fees would increase.

The representative, however, added that the contract is only binding in India and does not influence what the students do in Finland, and said that the clause had since been removed from the contracts. A Finnish human rights expert interviewed for the article stated that a contract cannot be made in the EU or in Finland to keep a person from having children, as the right to start a family a generally recognised human right.¹⁰⁵


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¹⁰⁴ Ilta-Sanomat 26 May 2025.

¹⁰⁵ Ibid.

CASE EXAMPLE 3

Another agency, through which students had come to at least five Finnish universities of applied sciences, had drawn up contracts with exorbitant interest rates. A legal professor quoted in the article stated that an 800% interest rate is unreasonable and could be seen as usury in the Finnish context. The company explained that with high interest rates they wish to avoid a situation where the student does not pay the agency and that according to local legislation, interest rates can be agreed upon freely.¹⁰⁶ According to the article, at least one of the Finnish educational institutes has been aware of the problematic contracts but had not, at the time of the publication of the article, actively intervened.

In a Dutch case from 2021 nursing students from Indonesia were sent to the small city of Drenthe through educational institution Avans+ to address the shortage of nurses in the Netherlands. A group of students complained about labour exploitation during their nursing internship. Their work contract included a clause stating that the consequence of speaking badly about the Drenthe healthcare facility was a €1,000 fine. The same fine would also be imposed if they did not disclose private matters such as pregnancy or cohabitation. The interns had to work all weekends and overly long working days.¹⁰⁷

Instead of addressing the exploitation, Avans+ decided to stop recruiting nursing students from Indonesia.¹⁰⁸ Neither the institutions involved nor the province of Drenthe properly addressed the exploitation of the Indonesian students.¹⁰⁹ In 2025, the Immigration and Naturalisation Authorities decided to revoke the student visas of the remaining nursing students who were given until December 1 to apply for a different residence permit to avoid deportation.¹¹⁰

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¹⁰⁶ Ibid.¹⁰⁷ NOS Nieuws 21 Jul 2023.¹⁰⁸ EenVandaag 6 Nov 2023.¹⁰⁹ RTV Drenthe 9 Oct 2023.¹¹⁰ RTV Drenthe 7 Jun 2025.

How do middlemen benefit from inflated recruitment fees?

ACCORDING TO THE FINDINGS of this scoping review, recruitment agents or other middlemen often sell services related to, for example, submitting applications, communicating with educational institutions, prepping for entrance examinations, pre-departure (language) courses, and applying for visas or residence permits. These **costs are often inflated**, and they are charged under false pretences, as outlined previously. In this case the situation of international students is somewhat comparable to the situation of migrant workers who, according to globally available data, continue to pay a wide range of recruitment fees and related costs. The high costs can lead to situations of debt bondage and forced labour and/or increase the vulnerability of migrants to such phenomena.¹¹¹ In fact, the relationship between recruitment and trafficking is complex given that exploitation and trafficking are embedded within the wider structural issues around low-wage labour migration that lead to exploitative work conditions.¹¹²

Dishonest middlemen often demand excessively high fees from students and their families, especially by local standards. At least the following features have been identified in this project:

- **CHARGING** high costs for services, which the applicants could technically take care of themselves;
- **CHARGING** inflated costs for language training courses or similar orientation-related services;
- **REQUIRING** students to sign contracts where they agree, e.g., not to get pregnant during their studies or which feature other clauses concerning personal matters;
- **PROVIDING** loans at high interest rates to cover their fees, or facilitating arrangements where the prospective student can show the required amount of money in their bank account for migration authorities before it is transferred away;
- **CHARGING** fees for the provision of forged language skill certificates or academic certificates.

¹¹¹ ILO 2024.

¹¹² Fabbri, Stöckl, Jones, Cook, Galez-Davis, Gran, Lo & Zimmerman 2023.

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The phenomenon may resemble the so-called threshold fees¹¹³ that are sometimes demanded from migrant workers in exchange for a job. The fees paid for jobs may be very high, up to 25,000€. ¹¹⁴ The payment creates a situation of debt, which greatly contributes to an increased risk for exploitation and trafficking. Furthermore, the debt burden prevents victims from leaving the exploitative situations, seek help, or return home.

To pay these inflated recruitment fees as well as to finance their studies, the students or their families may have to sell their assets or take out loans, also from informal money lenders with extravagant interest rates. Taking out loans creates, consequently, another vulnerability for exploitation, as debtors may charge high interest. Furthermore, discontinuing one's studies may be difficult when (extended) family members have invested large sums of money in one's education abroad.

Recruitment fees have also caused problems for universities as they have had trouble finding out what has been paid and to whom. According to the respondents to the background survey, some educational institutions have tried to communicate to the prospective students that they should not pay anything to the partner agents, as the agents are remunerated by the university. A few respondents pointed out, however, that agencies may market additional services that are subject to a charge. The interviewed experts from the Ministry of Education and Culture stressed that all communication (materials) should highlight the fact that prospective students can apply directly to the university without employing an agent.

In the background survey, more than half of the respondents knew of cases where students had paid for assistance with university or visa applications or preparing for the entrance examination, preparatory training in the country of origin, and flight or accommodation arrangements.

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¹¹³ See e.g. the case of healthcare employees recruited from Ethiopia (Police of Finland 24 Sep 2024).

¹¹⁴ Helsinki Police 18 Jan 2023.

CASE EXAMPLE 4

High fees for pre-departure training for vocational institute students¹¹⁵

SEVERAL STUDENTS FROM MYANMAR came to Finland to study practical nursing at the vocational institute Riveria. A company in Myanmar had charged nearly \$10,000 from the students for an on-line pre-departure training. The head of this company was Riveria's former Finnish principal. The pre-departure training was provided by another company that is a subsidiary of the Riveria institute.

According to Yle news, the Finnish Ministry of Education and Culture is investigating the situation and aims to understand, among other things, what the students paid for and what kind of financial transactions took place between the two companies. A director at the ministry interviewed by Yle stated, "when education is funded with taxpayers' money, the education provider must ensure that foreign partners are not exploiting students".

The practical nurse training was conducted in collaboration with the Finnish county of North Karelia, which did not pay for the nurses' education. The county had received signed documents from the students stating that they were "able to bear the cost of education without any excessive commitments to myself or my relatives, and I have not taken any student loan in my country". The current principal of Riveria stated that they have stopped recruiting nursing students to Finland and are now focusing on degree-level training.

According to our interviewee from the Icelandic Directorate of Immigration as well as an ad hoc consultation with a Swedish expert, university employees in some countries of origin may verify forged documents in exchange for money. In the Icelandic context, these cases have come to light during the process of authenticating applicants' documents as well as in cases where students admitted to master's degree programmes in Icelandic universities have shown no familiarity with the academic system and, in some cases, have appeared never to have attended high school or university, despite presenting diplomas stating otherwise.

¹¹⁵ Source for the case example: Yle 11 Sep 2024.

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Is the student visa system misused in the Nordic countries and elsewhere?

Finland

IN FINLAND, STUDENTS IN English-language higher education degree programs can obtain a type A continuous residence permit for the full duration of their studies, and also the students' family members can be granted a residence permit.¹¹⁶ Some authorities, including law enforcement officers interviewed for this project, raised concerns over the potential arrangement of illegal immigration (*human smuggling*) through persons applying for study places and getting a study-based residence permit just to gain access to Nordic countries or the Schengen area without the intention of actually studying.

According to a 2023 questionnaire for Finnish universities of applied sciences, around 5% of international degree students had registered as attending and paid their tuition fees, but never showed up.¹¹⁷ As a case example, Helsingin Sanomat reported of a vocational school in Eastern Finland into which 20 students from all over the world had been accepted to study to become a chef, but only 11 showed up: a few had declined but the rest had “disappeared”.¹¹⁸ It has been speculated that such disappearing students may seek work elsewhere, and may end up in exploitative labour situations in other parts of Europe. The extent of the phenomenon is, however, difficult to gauge.

Interviewed law enforcement representatives highlighted that in addition to misuse of the student visa system, potential misconduct may include forging of documents such as diplomas, testimonials and bank statements provided by dishonest agents and middlemen in exchange for large sums of money.

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¹¹⁶ Ministry of Economic Affairs and Employment 13 Apr 2022; NB. the Finnish Government outlined in late 2025 that a student's family can only move to Finland one year after the student (Ministry of Economic Affairs and Employment 18 Dec 2025).

¹¹⁷ Yle 21 Sep 2023.

¹¹⁸ Helsingin Sanomat 26 Jan 2025.

” These agents carry out this operation in such a way that any field labourer, who may not in reality be qualified for higher education, can pay the agent to obtain whatever certificates, employment history, and educational history they want – as well as bank account balances that do not actually exist in real life.

– Law enforcement officer, Interview 11.

The interviewee also referred to incidents where online interviews and language tests have been attended by persons other than the applicants themselves because of difficulties in verifying the participants’ identity. There have also been indications of entrance exams sessions where an auditorium full of prospective students fill out online entrance exams to which a company supplies the correct answers. The intention of such prospective students may be genuine in the sense that their intention for requiring the visa for studies is for conducting studies in the destination countries, but for some, this can be the means of illegal entry to the Schengen area.

To avoid such misconduct and risks of misuse, some countries have introduced face-to-face interviews e.g., at the embassy. Furthermore, the potential of using an external service provider in the verification of applicants’ documents has been discussed. The law enforcement representative also called for (joint) entrance examinations in countries of origin organised by the staff of Finnish educational institutions. Moreover, one Finnish university of applied sciences has tried to tackle the issue by requiring the students to enrol in person at the start of the semester. If the student fails to appear, the university will retract their conditional admission and notify the authorities since the criteria for a residence permit for studies is no longer met.¹¹⁹

In the background survey, we asked whether the respondent’s educational institution has admitted foreign students who have gone missing during their studies, and for whom there is reason to suspect that studying was merely a means of entering the country. Out of 48 respondents 18 (38%) said yes, 11 (23%) said no, and 19 (40%) were unable to say. When asked how these cases were uncovered, the respondents said that the

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¹¹⁹ Yle 9 Dec 2024.

students had, for instance, never showed up at the institution; had dropped out after some time, without giving a (credible) reason; had appeared to be present at the institution but had zero study credits or did not enrol into or show up at classes; the institution had been unable to contact the student; and in some cases, the issue became known when authorities contacted the school.

Other Nordic countries

THE OTHER NORDIC COUNTRIES have also uncovered examples of misuse of student permits. In **Sweden**, a study published in 2024 by the Swedish National Audit Office estimated that 250–350 third-country nationals enter the country annually with residence permits for studies, but do not enrol for their studies. Some higher education institutions have experienced that students with insufficient intention to study have systematically applied to certain programs. The Swedish Migration Agency has also pointed out that problems with lack of genuine study intention are common in certain regions and countries where unscrupulous recruitment agents operate.¹²⁰

The Swedish Migration Agency published a report in 2022 in which they, too, found strong indications of the abuse of student residence permits by persons who used the permits mainly to work. The report looked at Pakistani students, nearly a third of whom abandoned their studies for full-time work at the first opportunity. The report framed this as a consequence of the legislation which does not limit the number of hours an international student can work alongside their studies, and which provides an opportunity to apply for a work permit after one semester of studies. It was argued that the oversupply of study places for international students and low language requirements contribute to the issue, and because tuition fees are an important source of income, the institutions have an incentive to admit international students “without setting particularly high requirements”.¹²¹

To prevent the misuse of residence permits, the Swedish Migration Agency has conducted study intention assessments with the help of embassies. They consist of personal interviews which focus on the applicant’s current situation, knowledge of

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¹²⁰ Riksrevisionen 2024.

¹²¹ Migrationsverket 2022, 7–8.

the program they have applied for, and motivation for applying for the particular program. Regarding Pakistan, 30–40% of these assessments had resulted in rejection during a three-year period of analysis. Yet, a random sample showed that more than 70% of those who passed the assessment dropped out of their program before the second year. This suggests that the rather resource-intensive practice has not been totally effective. The Migration Agency also contacts students who seem to live far away from their place of study – which may be an indication of a lack of intention to study – and asks them how they intend to complete their studies remotely. It was recommended in the report that the Migration Agency should create incentives for higher education institutions to focus on recruiting students who have a genuine intention to complete their studies.¹²²

The Swedish Migration Agency saw the individuals abusing study-based residence permits as a vulnerable group in the Swedish labour market. The 2022 report focused on Pakistani nationals, who, at the time, constituted the third largest group of international students in Sweden, and among whom suspicions of study permit abuse were common. However, the students approached by the agency for an interview did not wish to participate, and no concrete evidence was found of the group being systematically exploited. Still, many international students are in a precarious financial situation and rely on work to support themselves, have limited knowledge in Swedish and in the regulations of the Swedish working life, and work in high-risk sectors, e.g., in restaurants, and these factors make them more vulnerable to exploitation. Regarding the Pakistani students, a third of those examined in the report neither applied for a continuation in their study-based permit nor applied for a work permit: the whereabouts and situation of these individuals raises particular concern.¹²³

Denmark removed the right to work, the right to search for a job for six months after graduation and the right to bring accompanying family members from international non-EU/EEA students enrolled in non-state approved higher educational programs from May 2025 onwards. The purpose was to ensure that residence permits are only granted to those “whose real intention is to study in Denmark”.¹²⁴

¹²² Ibid., 8, 16.

¹²³ Ibid., 9, 12, 14.

¹²⁴ New to Denmark 1 May 2025.

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Moreover, in September 2025, the Danish Ministry of Immigration and Integration stated that gaining admission to Danish universities will become significantly more difficult for third country students without the right qualifications. The authorities aim to prevent the misuse of student visas as a route to the Danish labour market, based on the steeply increasing intake of international students and the assumption that study permits are used for labour migration. Bangladesh and Nepal in particular are seen as problematic countries of origin, since students from these countries reportedly have a relatively high dropout rate and often bring their families with them to Denmark. The planned measures include having tougher academic entry requirements, strict document verification, follow-up of past permits, limitations on bringing family members, tighter control on whether students progress with their studies, and shortened post-study jobseekers' permits.¹²⁵

The University of Roskilde (RUC) shut down a popular master's program reportedly due to the high number of Bangladeshi students. The Danish newspaper Berlingske published an article claiming that the university was luring students from Bangladesh to improve its financial situation, and that the students were using their residence permits to enter the Danish job market. According to Berlingske, nine new Bangladeshi students were admitted to the RUC Master's programs in 2020, but in 2024, the number had reached 300. The Danish Prime Minister expressed criticism at the university and suggested that the students were abusing the study programs. As a result, RUC announced that they were shutting down their Business Administration and Leadership Master's program which had been especially popular among Bangladeshi students, and the university's chair of the board resigned. The university's rector said that even though the university tried to curb the interest shown by Bangladeshi students, private agencies were marketing the university and the opportunity for a residence permit for the student and their family, and that this marketing may have given applicants an unrealistic view of Denmark.¹²⁶

According to the Danish Minister for Higher Education and Science Christina Egelund, the government is looking at four policy options to address the influx of students. These include

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¹²⁵ Udlændinge- og Integrationsministeriet 18 Sep 2025.

¹²⁶ Helsingin Sanomat 10 Oct 2025; Berlingske 29 Sep 2025.

making changes to students' spouses' residence permits; increasing tuition fees; tightening admission requirements and scrutinizing international students' academic credentials more carefully; and a closer monitoring of study activities and expulsion of third country students who are not actively studying.¹²⁷ The Ministry also launched an investigation on the eight Danish universities' experiences of the increasing number of students from Bangladesh and Nepal. The universities mentioned spouses' residence permit, possibility to stay in the country for up to three years after graduation, educational agencies' work, scholarship opportunities, and policy changes such as increased tuition fees in other European countries as factors that may have increased the number of Bangladeshi and Nepali applicants. Conditions in the countries of origin, such as limited capacities of national higher education institutions as well as a growing middle class with money to spend on education abroad were also seen as aspects potentially impacting the students' interest in applying into Danish universities.¹²⁸

The universities had observed, according to in their responses to the investigation, that some students from Bangladesh have had trouble studying in English, keeping up in class, passing exams, and adapting to the Danish academic culture and ways of studying. The level of some students' previous education does not seem to match the requirements of the study programmes, although on paper, the students have the necessary credentials. Some students have also struggled with meeting payment deadlines for tuition fees, and some of the universities have identified a higher-than-average drop-out rate among their Bangladeshi students.¹²⁹ Aarhus University made a general observation that one-third of students from Bangladesh do well, one-third face challenges but try to overcome them, and one-third do not appear to be genuinely interested in studying but rather, want to reside in the country for another reason.¹³⁰

In **Iceland**, the Minister of Justice announced in November 2025 a tightening of regulations governing student visas in response to a significant increase in applications from non-EEA countries. The proposed amendments include reducing the duration of post-graduation residence permits and introducing

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¹²⁷ University Post 18 Sep 2025.

¹²⁸ Uddannelses- og Forskningsministeriet 2025.

¹²⁹ Ibid.

¹³⁰ Ibid., 4.

restrictions on family reunification. These measures follow a marked rise in enrolments from Nigeria, Pakistan, and Ghana. At the University of Iceland (Háskóli Íslands), the number of Nigerian students has increased eightfold over the past three years, while the number of Pakistani students has grown fivefold. The government has identified student visas as a critical pressure point within the immigration system and has expressed concern that, in some cases, study permits may be used primarily as a means of securing residence rights rather than for obtaining education.¹³¹ This approach was criticised by the representative of University of Iceland, who pointed out that the increasing numbers do not mean that system is being exploited. However, he did mention that it would be reasonable to consider setting limits on how many foreign students can be accepted each year, and that a proposal to that effect has already been put before the university council.¹³²

In contrast to other Nordic countries, in **Norway** there were no media articles found regarding the misuse of the student visa system or disappearing students. However, according to the Immigration Appeals Board (UNE) the most common reasons for the rejection of applications for a study permit is that UNE does not believe that the purpose of coming to Norway is to study full-time; because the applicant is not going to study further at a higher level; or because the applicant's study progression is poor. UNE also rejects applications if the applicant cannot provide for themselves in Norway or if they do not believe that the applicant will go home after concluding their studies. All cases considered by UNE have first been considered by the Directorate of Immigration (UDI).¹³³

Examples from other European countries

CASES OF SUSPECTED STUDENT visa abuse have come to light globally. In **the United Kingdom**, the media has reported of cases where international students have vanished from their courses early on and have later been found working in exploitative conditions. In a case identified by the Gangmasters and Labour Abuse Authority, students were performing care work with just 16 hours of online training and most of them had not

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¹³¹ RÚV 4 Nov 2025.

¹³² RÚV 7 Nov 2025.

¹³³ Utlendingsnemnda 2024.

undergone criminal background checks. The suspected exploiters ran a staffing agency and had given false information about the students to the care homes.¹³⁴

In **Poland**, the surge of international students has also resulted in concerns about misuse of student visa system. A 2024 governmental found that only 59% of first-year foreign students in 2018 and 53% in 2022 advanced to their second year. Officials concluded that student visas were being used as a back door into the Schengen Area’s labour market rather than for genuine study.¹³⁵ In the fall of 2025, the Polish Border Guard Authority reported that 12 people were indicted for issuing of more than 1,000 false documents from three private universities to enable migrants from Africa, Asia, Eastern Europe and Latin America to enter the EU. The three universities involved were also accused of issuing documents for which they charged between €120 and €1,400, including certificates of acceptance despite lacking the necessary accreditation from the Polish Ministry of Interior.¹³⁶

In **the Netherlands**, the Dutch Immigration Service (IND) noticed in 2021 that many international students, particularly from Bangladesh, discontinued or never started their studies. Many had also registered a business with the Chamber of Commerce as a self-employed person.¹³⁷ Several Universities of Applied Science recognised similar problems regarding some of the students from Bangladesh, Sri Lanka, India, Pakistan and Nigeria.¹³⁸ The Dutch Association of Universities of Applied Sciences attribute this to smugglers who help students from high-risk countries to the Netherlands, trying to look for “weak spots in the system”.¹³⁹ The irregularities in student migration led to an investigation into the misuse of study permits. The Code of Conduct from International Student Higher Education was revised, and in it, the requirements for higher education institutions to cooperate with third parties in the recruitment of international students were clarified.¹⁴⁰

In **Latvia**, the government has proposed stricter regulations regarding the residence of third country nationals, including international students after concerns of misuse of the student

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¹³⁴ The Guardian 3 Jul 2022.

¹³⁵ TVP World 13 Nov 2025.

¹³⁶ Brussels Signal 13 Oct 2025.

¹³⁷ Tavares, Wirken, Moll, Meffert, Roos & Pieters 2023.

¹³⁸ NOS Nieuws 2 Sep 2022.

¹³⁹ RTL News 2 Sep 2022.

¹⁴⁰ Tavares, Wirken, Moll, Meffert, Roos & Pieters 2023.

visa for work in particular in restaurants and food delivery.¹⁴¹ Between 2022 and 2024, 2,534 student temporary residence permits were revoked due to studies being interrupted or the student being excluded from the education institution, most commonly concerning students from India, Uzbekistan, Sri Lanka, Cameroon, Turkey and Pakistan.¹⁴² The new government proposal envisages that first-year students from third countries must make a financial security deposit, which will cover the students' living expenses and/or return costs in case the student stops studying in Latvia and has their visa or residence permit cancelled. According to media sources, some educational institutions are already implementing such a financial security account, from which an appropriate amount is issued to the student every month.¹⁴³ Furthermore, the government proposal would also limit the right to invite family members only to doctoral students and remove the right from bachelor and master's level students.

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¹⁴¹ Discussion with Latvian trade union representative 20 January 2026.

¹⁴² Lsm.lv 5 Mar 2025.

¹⁴³ Lsm.lv 16 Dec 2025.

Risks during the studies in Finland

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In this scoping review, we identified many challenges and risks relating to ensuring a livelihood and securing a job while studying, including problems in fulfilling the income requirements for studies and an overall lack of funds to cover tuition costs.

BECAUSE OF THE OVERALL precarious situation of the students, some of them resort to accepting poor job offers, which may result in direct situations of **labour exploitation**. Problems with sustaining themselves, including access to **accommodation and food** were identified as key risk factor that contribute to international students' vulnerability in Finland during their studies. Furthermore, our scoping review also provides some indications of risks of **sexual exploitation and exploitation in criminality** as a consequence of the students' vulnerable position.

What are the challenges related to livelihood and securing a job during the studies?

THE COST OF LIVING in Finland is high, and international students studying in English-language programmes are not entitled to financial assistance from the Finnish state. International students may feel a pressure to accept any job to pay for basic necessities, and in some cases, to provide for their family in Finland or their country or origin; to send money home to relatives; or to pay back the loan taken out in order to move abroad. All of the interviewed international students agreed that the biggest challenge for international students and recent

graduates is to secure a job in the current labour market situation and competing for jobs against native Finns.

One interviewed student explained that getting a job is difficult because instead of hiring people already in the country, such as students, some agents are bringing in employees from abroad. The agents may be persons already working for the company in need of workforce who have networks in their country of origin. The student suspected that this was because they are able to make a profit by charging high fees for the jobs:

” But right now [e.g., cleaning jobs] are being done, like, there are some agents who are bringing workers from some countries. I mean for some money, a huge amount of money like 5,000–8,000 or 10,000 euro. And they’re bringing in workers, giving work visas directly and they’re coming. So those positions are not vacant right now, which could be used by the students and the students could manage. Like cleaning jobs or paper delivery, these kinds of things. [...] So that’s why students are the great sufferers right now.

– International student, Interview 12.

Moreover, also in the background survey, 91% of respondents working at higher education institutions reported being aware of cases where international students have had financial problems. Several respondents had encountered students who had problems with paying their tuition fees, rent or other living expenses, who had counted on finding a part-time job but did not succeed in doing so, or who had to deal with delays or other problems in their studies because they had to work so much.

In particular because of the current economic downturn, getting a job in Finland is challenging, and even more so for people whose Finnish or Swedish language skills or formal qualifications are lacking. Employment also varies by location, and especially smaller towns may offer few employment opportunities for international students. One student interviewee who had graduated from a Finnish university already several years ago, described the situation at the start of their studies like this:

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” Everyone was rushing for jobs. I couldn’t find anything that was very formal. I started delivering papers. And this was a very coveted job because it was the only one that accepted you without many, many things. It was very informal and nobody was giving more vacancies. I just had to meet somebody who got sick and I was able to replace them for some weeks. I depended on my colleague to pay her salary to me. But if she didn’t want to, I would have done this for free, you know. So that’s the thing that the informality starts with a chain of the lack of jobs, the type of jobs and then the supply chain or the chain of passing down responsibilities that are not managed.

– International student, Interview 14.

An interviewed representative of an educational institution pointed out that while arriving with one’s spouse and children may help a person integrate and feel more at home in Finland, any financial difficulties will then directly affect the whole family.¹⁴⁴ Furthermore, an interviewed assistance provider argued that recruitment of international students can disrupt social structures in the Global South as middle-class families who often support underprivileged members of the local community move to Western countries. As a result, these families thereby discontinue this support and instead, experience socio-economic precarity themselves in the country of destination.

” There are these cases where the mother and the father worked in a bank in India, in good jobs, and then they came to Finland and assumed that they will both get a job in a bank. They certainly will not. Getting a specialist job in Finland is really challenging.

– Representative of a higher education institute, Interview 1.

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¹⁴⁴ See also Yle 3 Apr 2025.

A student's residence permit may be revoked or not renewed if the student does not comply with the time limits concerning working hours, their studies do not progress sufficiently, their subsistence is not secured, or their insurance is not valid. This means that students may be unwilling to disclose their financial situation to anyone, or much less, apply for social assistance (toimeentulotuki) in fear of having their residence permit revoked.¹⁴⁵ The current Government Programme addresses the topic of social assistance, stating that “with respect to education-based residence permits, a practice will be adopted in which a person's permit will be revoked if they resort to Finnish social assistance”. Moreover, Kela must provide such information to the Immigration Service “upon request and on its own initiative” and the possibility of utilizing other authorities' registry data for post-monitoring will be explored.¹⁴⁶ Legislation related to this is currently being developed.¹⁴⁷

World Student Capital, a network consisting of student unions of eight higher educational institutes in the Helsinki metropolitan area, released a statement in 2025 calling for urgent action to ease international students' financial distress.¹⁴⁸ The statement asserted that students are making important financial decisions based on false information while the intermediaries involved in the student recruitment process deny responsibility. The network calls for cross-sectoral cooperation in improving the situation of current international students, as well as for a more ethical recruitment process ensuring that applicants are aware of the realities of living costs and employment opportunities in Finland.¹⁴⁹

The interviewed representatives of higher education institutions stated that educational institutions are very mindful of giving a realistic picture of life in Finland. This includes information on the cost of living, housing situation, the weather, and the possibility of working alongside studies. Moreover, the students are reminded of the fact that they are expected to study full-time. 94% of the background survey respondents said that new students get an information package in English. In addition, many institutions spread information on their

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¹⁴⁵ See also Iso Numero 9 Apr 2025.

¹⁴⁶ Finnish Government 2023.

¹⁴⁷ Ministry of Economic Affairs and Employment 16 Jan 2026; 2024 (TEM013:00/2024); Helsingin Sanomat 23 Feb 2026.

¹⁴⁸ World Student Capital 17 Jun 2025.

¹⁴⁹ Ibid.

webpage, some employ agencies in informing prospective students, and some organise webinars for applicants and accepted students. Several interviewees, however, also called for the students' own responsibility in making sure they are properly informed before coming to Finland.

” Now the problem is that even though this information is sent to the students, there is no guarantee of them actually reading that information or understanding that information. And I think that that is a big problem. So when again, higher education institutions are accused of falsely informing or not informing, in my experience, that's not true. They are informing because they don't want to end up in the news. It's really, really bad for higher education institutions to end up in the news being accused of exploiting their students or their students not finding suitable jobs and so on. So really, it's in their interest to avoid this.

– Educational policy expert, Interview 9.

According to the background survey, some educational institutions have hired a social worker or counsellor to support international students in matters related to integration, housing, access to services, and so forth. University chaplains are also often key figures in offering support: as described by one of the interviewees, in many educational institutions, the number of international students the chaplains meet with has increased drastically. Another interviewed representative of a higher education institute said that they employ integration services specialists who co-operate with municipal/regional service providers especially regarding students who arrive with their families in order to, e.g., find family apartments and reserve places at day care centres or schools.

An interviewed representative of a municipality expressed concern over international students in vocational education with a type B residence permit. Many of them have no municipality of residence and therefore have limited access to services and may be unable to open a bank account, for example. The representative explained that some international students may also attend vocational education through apprenticeship

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contracts. This is often organised as commissioned education, where, for instance, a recruitment company and a health care company cooperate in the recruitment and education of care workers. Traditionally, there has been a labour shortage in the Finnish health care sector, but due to the current job market situation, gaining employment is not guaranteed, especially for persons with limited language skills.

In a worst-case scenario described by the representative of a municipality, a person has spent their savings to study a vocation in Finland, but ends up unemployed and deported, or as an undocumented migrant, vulnerable to several forms of exploitation. The latter path may particularly concern persons who have no money to return to their home country or who feel that returning would be unsafe for them due to, for example, political unrest in the country of origin or personal circumstances such as being unable to pay back their loans.

” There’s a lot of talk about how we need international students and foreign labour, but in practice it often feels like a kind of Wild West, where people end up being pawns in their own lives.

– Representative of a municipality, Interview 15.

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CASE EXAMPLE 5

Nepalese students and their spouses struggling to find work in Finland¹⁵⁰

ISO NUMERO MAGAZINE REPORTED in April 2025 about two Nepalese women studying in Finland, Manita and Pranisha (not their real names).

Manita is a radiological nurse who has worked in hospitals in Nepal. She heard from her acquaintances about the possibility of studying nursing in Finland. A Nepalese agency brokering study places abroad told her that it would be easy to find a job in Finland, and that her husband could work full-time. The agency also falsely told her that in Finland, students and unemployed persons get social benefits. Instead of nursing, the agency applied for a study place in gardening on Manita's behalf.

When Manita protested, the company won her over by saying the study program could be changed after half a year, which is not true. The annual tuition fee is about €10,000. Manita used her savings to pay for the first year, and her parents also helped. Her intention was to earn the money for the following years' tuition by working in Finland.

Manita and her husband arrived in Finland in 2024. They were unable to find jobs. Manita says that there are jobs, but Finnish is required. She has also applied for internships in greenhouses but without success. Manita does not get any social benefits; her husband may get labour market support at some point. Because the student dormitory does not house couples, Manita and her husband live in private accommodation in a mid-sized Finnish town. The rent is €700, and the transport ticket is €50 a month.

The husband gets a monthly €200 housing allowance from the state. They do not have any other income. The €5,000 fee for the following term is soon due. Manita has applied to different schools to study nursing. If accepted, she will have to pay €10,000 for the first year of studies, again. The couple's savings are running low. They have received food aid from the church a couple of times. Manita has noticed that many of those queueing for food aid are Sri Lankan and Nepalese students.

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¹⁵⁰ Iso Numero 9 Apr 2025.

CASE EXAMPLE 5

Pranisha came to Finland in 2024 to study business in a university of applied sciences in Southern Finland. Her studies cost approximately €10,000 per year for a 3,5-year programme. On top of that, Pranisha had to spend money on an agency fee, visa application fees, travel tickets and living expenses in Finland. The total price of the studies is around €70,000.

Pranisha did not have such a sum in savings, but she was confident enough to travel to Finland after the agency told her that she would be able to get a part-time job. Her husband came with her, planning to work full-time. Pranisha does not get any financial aid, but her husband receives an unemployment benefit and is attending a Finnish course. Pranisha has been promised a summer job as a cleaner. The €5,000 fee for the fall semester is due in the summer, however, and Pranisha does not have the money. She says she cannot go back to Nepal because she has spent her own and her parents' savings.

According to two parish workers who distribute food aid, the students who have found themselves in trouble are often either from a very humble background and their studies are being funded by the extended family or community, or from an upper middle-class background, and they have sold belongings or taken out a loan to come to Finland.

What they have in common is that they have thought or been told that getting a part-time job during studies in Finland would be easy. Many are ashamed to ask for money from relatives back home when they themselves have promised to send back money. The parish workers argued that the educational institutions who benefit financially from international students, as well as the society at large, are ignoring the students' struggles, and that there is currently no structural way to assist them.

Some of the experts interviewed for this scoping review also questioned why international students are allowed to bring their families along, when the same is not possible for those on an employment visa.

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” There’s a lot of information going on in different countries that it’s really easy to get a job here and then the spouses come and it’s not that easy to get a job. But I think it’s quite interesting that to get a spouse into Finland when you are working, you need to have a quite a big salary, and a long-term salary as well. But if you are studying you can get the spouse and you can get your children here even if you don’t earn any money here.

– Integration service provider, Interview 16.

The Finnish Government outlined in late 2025 that the law shall be tightened so that a student’s family can only move to Finland one year after the student.¹⁵¹ The income thresholds regarding the family members of persons with a study-based and, e.g., an employment-based residence permit are the same.¹⁵² However, the income thresholds of the permit holders themselves depend on the type of permit.

How does the student income requirement and lack of funds to cover tuition affect the situation of international students?

IN ORDER TO APPLY for a visa, prospective students must have sufficient funds for a year on their bank account. Currently the sum is €9,600.¹⁵³ According to some of our interviewees, cases have unfolded in which this sum has been transferred from one prospective student’s account onto the next: each student has obtained a bank statement showing the required amount, but the money has not really been their own. At worst, the students may have to pay large fees for such services. A similar practice was reported by an interviewee working at the Icelandic Directorate of Immigration. Moreover, one of the interviewed students admitted to falsifying the document for them and their spouse before they both came to study in Finland:

¹⁵¹ Ministry of Economic Affairs and Employment 18 Dec 2025.

¹⁵² Finnish Immigration Service n.d. (f).

¹⁵³ Finnish Immigration Service n.d. (a).

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” Of course we didn’t have the means to live by ourselves in Finland for a year, especially for two people. So we asked different family members to put together the necessary money into one account, printed that statement, moved all of that money into another bank account, printed that statement. Gave all the money back, sent those statements to the office and that is enough to get you through. So that is the first thing you can go through without necessarily having the means to be there. But it wasn’t just us. There are lots of different students who did that and different things to try and get there, but that is the start of a precarious situation for students who don’t have the means. My plan, as I found with many other students, was to go in early to the summer Finnish language courses. To try and learn Finnish for a month or two as fast as possible to be able to hopefully find jobs before starting school. When I went there, everyone had the same plan, so it wasn’t very easy.

– International student, Interview 14.

Students who have engaged in the falsification of bank statements may be in high debt and are thus likely to be even more reliant on finding a job to sustain themselves, which again may lead to accepting dubious jobs offers or working in exploitative conditions. Some European countries have introduced blocked accounts as a way to ensure that students in fact have the required money in an account. The blocked account was also mentioned by some of the interviewed experts as a potential future solution to ensure that (non-EU/EEA) students arriving in Finland truly have enough money to cover their monthly expenses.

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CASE EXAMPLE 6

Blocked account

IN GERMANY, A BLOCKED account (Sperrkonto) is opened with either a German service provider or a German bank before applying for a visa or residence permit. After applying for a blocked account and transferring the required amount of money – in 2025 the annual amount for students is €11,904, i.e., €992 per month – the provider will send the applicant a confirmation document which is then submitted to the German embassy along with the visa application. The blocked account can be activated once in Germany. The account holder receives monthly transfers from the blocked account to their current account.¹⁵⁴

Some service providers reportedly ask for proof of the origin of the money, while others do not.¹⁵⁵ Blocked accounts are used in different European countries, including Norway, where the non-EU/EEA/Swiss students' annual funds must be placed either in a Norwegian bank account or a deposit account of the educational institution¹⁵⁶ and in Belgium, where students' blocked accounts are opened either by the higher education institution or in a financial services company offering such service.¹⁵⁷

Currently, blocked accounts are not offered by banks operating in Finland, and foreign nationals residing abroad who are in the process of applying for a residence permit cannot, in most cases, open an account in Finland. If this was made possible, transferring the money before applying for a residence permit could still delay the application process significantly: transferring money from certain countries is known to be challenging due to banks' responsibility to verify the origin of funds in order to prevent money laundering. In some countries, blocked accounts are operated by the educational institutions themselves. This would impose new duties on the institutions and put them in a potentially conflicting role as the entities that, at the same time, collect tuition fees, maintain the blocked accounts, and award scholarships.¹⁵⁸

¹⁵⁴ Germany Visa. n.d.

¹⁵⁵ Ibid.

¹⁵⁶ Norwegian Directorate of Immigration n.d.

¹⁵⁷ IBZ Immigration Office n.d.

¹⁵⁸ Ministry of Economic Affairs and Employment 2025, 103–106.

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Moreover, having access to the money little by little would not prevent an arrangement where borrowed money would be paid back to a debt collector in instalments. Still, as some countries have used blocked account in the context of international students, data exists and can be evaluated of whether the system works and could be introduced in Finland as well.

An interviewed assistance provider also suggested that the entire tuition fee should be paid in advance to the educational institution before the student leaves their home country. Currently, the tuition fee is usually due twice a year. Many have the funds necessary for the first year but come to the country counting on earning the money for the following years by having a part-time job. According to the interviewee, the second year is often the point by which students start to face financial difficulties, and by then they have already invested a lot of time, effort and money into a degree they may not afford to complete. However, the situation could be even more challenging for students would take out large loans to finance three or four years of studies and, due to not finding work, would be unable to make the repayments, and instead, accumulated substantial interest.

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How are international students exploited in the labour market?

” This [student visa to Finland] actually is a route to working in low-paid sectors.

— Representative of higher educational institute, Interview 1.

As explained previously, many international students rely on having a job to sustain themselves and in some cases, their families, including those living in their country of origin. The first identified risk of exploitation in labour concerns **students who may accept exploitative working conditions that do not fully correspond to Finnish standards and legislation because they do not have any other options.** In other words, as outlined in previous sections, challenges related to livelihood and a lack of funds may lead to a person ending up in exploitative working conditions.

Already in 2017–2018 interviews with non-EU/EEA students working in the Helsinki region revealed that low pay was the norm, and that companies tried to entice students into

unpaid work with promises of future career success based on the experience gained.¹⁵⁹ Paid employment, for instance service jobs, were often characterised by some elements of unpaid work too, e.g., when migrant students in zero-hour contracts in the cleaning sector would claim fewer hours than they had actually worked in order to appear efficient and retain their jobs.¹⁶⁰

Students' precarious labour market conditions have persisted over the years. In 2023, international degree students told Yle news about the difficulties they faced in securing even unpaid internships. Many reported that the only jobs available were in cleaning and food delivery.¹⁶¹ Exploitative labour practices linked to students have also been identified in Sweden.

CASE EXAMPLE 7

Exploitation of a Bangladeshi student and her husband in Sweden

IN SWEDEN, THE FIRST conviction for human exploitation in 2019 (the criminal offence came into force in 2018) was related to the exploitation of a Bangladeshi student and her husband. The couple belonged to the Bangladeshi middle class, and the studies were to be financed by her family. Both spoke English. When arriving in Sweden, they brought some money and assets (almost € 4,000 in cash and jewellery to a value of almost € 5,000).¹⁶² Upon their arrival in Sweden, the couple had no long-term housing. They visited a countryman's restaurant, and the owner offered them accommodation. After moving in and asking about the rent, the restaurateur stated that they had to work at the restaurant for a bit over 123 SEK (~€11) per hour with a deduction of 23 SEK (~€2) for accommodation and food. The husband in particular worked long hours, amounting to an average of 69h/week. Despite several requests, the couple received no pay, and the restaurant owner threatened the couple with deportation. The restaurateur was found guilty of human exploitation for work under clearly unreasonable conditions.¹⁶³ He was acquitted by the Court of Appeal, but the Supreme Court found him guilty of human exploitation in 2022.¹⁶⁴

¹⁵⁹ Maury 2019.

¹⁶⁰ Ibid., 816–818.

¹⁶¹ Yle 4 Nov 2023.

¹⁶² Supreme Court of Sweden 15 Feb 2022, Case No. B 1770-21.

¹⁶³ Johansson 2024, 12–13.

¹⁶⁴ SVT 15 Feb 2022.

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The second exploitation risk concerns **exploitation in platform work**. Many students have found work in food courier companies or the transportation sector, aided by the flexible hours and lack of full-time requirements. There, workers have operated as entrepreneurs and received compensation for deliveries while potential waiting time in between has been unpaid.¹⁶⁵

Food delivery work, however, is currently inaccessible to many. In Finland, 5,000–6,000 couriers work weekly for Wolt, but around 20,000 applicants are queueing for a contract with the company.¹⁶⁶ The subcontracting of accounts has emerged as a risk area in relation to platform work. This has been allowed by the companies, since couriers have been allowed to hire replacements for themselves. However, exploitation risks emerge when account owners for instance try to benefit from those willing to share their earnings in return for a dubious work opportunity as an unofficially subcontracted courier.¹⁶⁷ Yle interviewed 18 couriers on the phenomenon.¹⁶⁸ They were from Pakistan, India, Bangladesh and Nepal, and the majority had moved to Finland due to their or their spouse's studies. As described in the article, those subcontracting an account are in a precarious situation, because the owner of the account can, without warning, rent it to someone who earns more instead. Account owners can also freely stipulate what percentage or lump sum they charge from the subcontractor's earnings.¹⁶⁹

In 2025, the Supreme Administrative Court of Finland stated, that Wolt food couriers are to be regarded as employees, but due to the autonomy of the employees in choosing when to work, legislation regarding work-time would not apply.¹⁷⁰ Wolt disagrees with the ruling, and has offered employment contracts to only a fraction of the couriers.¹⁷¹ Similar discussion on whether couriers are regarded as employees or self-employed persons has taken place in other Nordic countries as well. In Norway in 2025, three bicycle couriers won a lawsuit against Wolt. In the verdict, the court argued that they should be considered employees, and ordered the company to grant them permanent employment, back-paid holiday pay, overtime

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¹⁶⁵ Maury 2019: 816–818; Maury, Hakala & Näre 2025.

¹⁶⁶ Yle 18 Jun 2025.

¹⁶⁷ See, e.g., Yle 27 Jan 2026; Helsingin Sanomat 1 Jan 2026; 25 Nov 2025; 23 Apr 2023; MTV Uutiset 16 Jun 2025.

¹⁶⁸ Yle 27 Jan 2026.

¹⁶⁹ Ibid.

¹⁷⁰ Supreme Administrative Court of Finland 22 May 2025 (KHO:2025:41).

¹⁷¹ Yle 7 Oct 2025.

pay, holiday pay supplements, and damages.¹⁷² In Sweden, the Administrative Court of Appeal in Gothenburg ruled in 2024 that Wolt’s food couriers are employees.¹⁷³

Exploitation risks among student food couriers have also been identified in Sweden. According to a discussion with a Swedish informant, 90–95% of food couriers in Växjö are students of Linne University. Many have been recruited in countries such as Pakistan and India by agents. They have come to Sweden with their families and ended up in exploitative work in the transport industry. Linne University reportedly notifies the migration agency within three weeks of the start of the semester about students who have accepted the study place but have not showed up: in these cases, the migration authorities will revoke the students’ visas. Furthermore, the university has aimed at lowering the risks related to the misuse of student visas by only admitting master’s students.

According to experts consulted for this review, authorities have encountered international students also in wild berry picking. Several cases of trafficking and exploitation related to wild berry picking have been identified in Finland and Sweden in the past.¹⁷⁴ For the past 20 years, wild berry pickers were primarily Thai nationals who entered the country with a tourist visa. Since the introduction of new legislation in 2025, berry companies have had to hire foreign pickers as employees in order to enable them to apply for a residence permit for seasonal work.¹⁷⁵ Berry companies have subsequently begun increasing their recruitment efforts among persons already in Finland, including international students. The scoping review also revealed cases where international students have been exploited in forestry work, according to one respondent, working with supporting international students in Finland.

Another risk concerns **unpaid internships**. Students may be offered employment on the condition that they do an unpaid internship or other unpaid trial period to prove they are good employees. The students have also encountered problems in securing internships as part of the degree programs where completing an internship is required in order for students to graduate, which is the case in many universities of applied

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¹⁷² Fellesforbundet. 12 Feb 2025.

¹⁷³ Arbetet 6 Dec 2024.

¹⁷⁴ See e.g., Yimprasert & Seikkula 2026; Yle 5 Sep 2025; 16 Sep 2025; 19 Aug 2025; Hedberg 2022; 2021; Axelsson & Hedberg 2018.

¹⁷⁵ Ministry for Foreign Affairs 19 Feb 2025.

science. These difficulties may, according to the interviewees, ultimately lead to graduates leaving Finland.¹⁷⁶

” People and students, especially not from the EU, do not feel valued. [...] The best job that my friends were discussing was dishwashing in a local restaurant. And it was so strict, and you had to take a course, and you have to pass and have the certificate. It’s a gatekeeping aspect that only certain people with certain privileges can pass easily. Everyone else is just completely pushed back. Nothing against that system, it doesn’t need to change. But, an alternative needs to open up for all of these students who cannot enter the system. There needs to be an alternative formal system, because otherwise everything falls into informality. There’s no way around it.

– International student, Interview 14.

Finally, students who have ended up in exploitative situations may also have **problems in finding support and advice** which hinders the disclosure of exploitative terms of employment and work conditions.¹⁷⁷ A lack of trust in the authorities, a lack of information on where to find support and advice, a mistrust towards trade unions, and a fear of the consequences of disclosure may heighten the threshold for reporting exploitative experiences among international students as is the case with migrant workers.¹⁷⁸ For example, in some countries, authorities like the police are not considered to be trustworthy, and trade unions may even be illegal. Students from such countries may not consider reaching out to these organisations for a fear of consequences. In their case, the best bet may be an NGO – for instance a multicultural NGO or Victim Support Finland. NGOs often offer help anonymously which may lower the threshold of contacting them.

¹⁷⁶ Yle 4 Nov 2023.

¹⁷⁷ See also Haapasaari et al. 2025.

¹⁷⁸ See e.g., Ollus et. al. 2025, 101–102.

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” A scenario that I can easily imagine, and which is quite likely to happen, is one where people come here on student visas, and now that food delivery companies might start employing drivers with employment contracts, the ones who end up taking these zero-hour contracts will likely be these school dropouts. And we already see signs in society, through support organisations, breadlines, and so on, that this group is growing. So, it’s not a huge leap to imagine that people might start being charged for those employment contracts and things like that.

– Law enforcement officer, Interview 6.

Experiences of labour exploitation of students has also been identified in various other countries. The **Norwegian** International Student Union advocated in 2018 for the Labour Inspection Authority, Labour and Welfare Administration and universities to create mechanisms to inform international students of their labour rights in Norway. For example, some international students working in Norwegian restaurants had reportedly faced exploitative conditions, including receiving fewer hours than contractually agreed, being denied sick pay, facing threats, or being underpaid.¹⁷⁹

British media has reported of cases of international students who have vanished from courses and then been found working in exploitative conditions.¹⁸⁰ UK universities have acknowledged that international students who are often young people who are living away from home for the first time are particularly vulnerable to human trafficking themselves. Rising living costs may further increase the risk of exploitation among students who are struggling financially. Evidence shows that in addition to labour exploitation, students are may also be subjected to sexual exploitation as well as criminal exploitation.¹⁸¹

In **Australia**, a survey with 5,000 international students as respondents found that the overwhelming majority of students were subject to wage theft and poor employment

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¹⁷⁹ Khrono 26 Apr 2018; Universitas 13 Mar 2018.

¹⁸⁰ The Guardian 3 Jul 2022.

¹⁸¹ Speller 22 Dec 2023.

conditions.¹⁸² Similarly, international students surveyed in Groningen, **the Netherlands**, reported facing exploitative conditions, e.g., underpayment, a lack of breaks, poor working conditions, prolonged working hours, verbal aggression, intimidation, and sexual harassment. The students were often unable to stand up for themselves due to language barriers, lack of knowledge and fear.¹⁸³ In 2025, several Dutch stakeholders collaborated in organising a regional week against human trafficking, with a special focus was on raising awareness among (international) students.¹⁸⁴

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¹⁸² Farbenblum & Berg 2020.

¹⁸³ Sikkom 22 Feb 2023.

¹⁸⁴ SHOP 10 Oct 2025.

What kind of problems related to sustenance and accommodation do students face?

MUCH OF THE MEDIA attention in 2025 regarding the problems faced by international students in Finland has focused on the increased number of international students seeking help via food aid queues.

CASE EXAMPLE 8

Surge in the number of foreign students seeking food aid

IN THE FINNISH CITY of Tampere, 30 to 40 percent of recipients of food aid are reportedly foreign students.¹⁸⁵ In Vaasa, an estimated one-third of recipients are students from Asia.¹⁸⁶ Similarly, the number of foreign students in food aid in Helsinki has grown rapidly, according to religious organisations.¹⁸⁷

The students are reportedly experiencing significant financial hardship, as many have paid €10,000–15,000 to study in Finland and came to the country believing they would be able to work alongside their studies. Some foreign students have presented aid workers with promotional material by agencies, which advertise the possibility of getting a job and earning money whilst studying in Finland.

A Sri Lankan student reported he has applied for nearly 300 jobs in Finland without success. He is currently living off his savings left but is likely to return home after his studies due to the lack of job prospects in Finland.¹⁸⁸

In Seinäjoki, the number of international students in the local congregation's food aid has reportedly remained stable over the last years, despite a rise in the number of international students in Seinäjoki University of Applied Sciences. According to the university's principal, the university communicates early on to prospective applicants how much it costs to study and live in Finland, and that it is difficult to find a job without Finnish language skills. The official agents that they employ are student alumni, who have moved back to their countries of origin.¹⁸⁹

¹⁸⁵ Yle 26 Mar 2025.

¹⁸⁶ Yle 19 Sep 2025.

¹⁸⁷ Yle 24 Mar 2025 (a) & (b).

¹⁸⁸ Ibid.

¹⁸⁹ Yle 11 Sep 2025.

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Experts interviewed for this review shared similar experiences. A representative of a municipality estimated that the number of foreign students in food aid in Helsinki ranges from a hundred to a few hundred people each week, i.e., five to ten percent of all food aid recipients. The students queueing for food aid are typically degree students, in their 30s or 40s, many of whom have brought their family with them to Finland. They may be in a very difficult financial situation, because unlike other migrants or Finnish recipients of food aid, they often have no source of income and are not eligible for any state financial aid.¹⁹⁰ Still, for some, accessing food aid may not be easy:

” I’ve heard that many of the food aid recipients’ acquaintances don’t go to food aid at all, even though their need would be quite severe. There are cultural reasons or stigma, they feel ashamed or simply can’t bring themselves to ask for help. And for some, it’s because they are studying, and lectures or studies take a lot of time, while many of these food distributions happen during the day. So getting aid can also be difficult for that reason.

– Representative of a municipality, Interview 8.

Some student housing providers have reportedly had to intervene in situations where international students have lived together with family members or friends in one-person rooms in shared student dormitories. A housing provider representative interviewed speculated that some international students may have an unrealistic view about the cost of living in Finland.¹⁹¹

According to a Helsingin Sanomat newspaper article, one university of applied sciences in Western Finland has an “accommodation crisis” since the number of international students has grown radically over the past few years – e.g., from 300 new international students in 2024 to 500 in 2025.¹⁹² There are not enough inexpensive apartments, and therefore many are living in emergency housing units. Some are, reportedly,

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¹⁹⁰ See also Iso Numero 9 Apr 2025; Hufvudstadsbladet 14 Jun 2024.

¹⁹¹ Yle 27 Dec 2024.

¹⁹² Helsingin Sanomat 7 Oct 2025.

sharing dormitory rooms meant for single occupancy. There are apartments available in the private rental market, but they are too expensive for the students. According to the local student housing provider, there are 250 applications in queue and zero availabilities. Their representative told the newspaper that if the student does not have an apartment, they should not come.

CASE EXAMPLE 9

Practical nursing students in unfurnished dormitories¹⁹³

TWENTY-SIX PERSONS ARRIVED FROM the Philippines to the Finnish town of Virrat in February 2025 to study practical nursing. The education was commissioned by a company in the Philippines. The students pay the company €9,500 a year, and pay for their own air-line tickets, visas, and accommodation. Some have reportedly taken out loans to finance their studies. The average age of the students is around 40 and many have children back home.

According to a representative of Tredu, the educational institution organising the studies, the students had been informed that the dormitories would be unfurnished. The students interviewed by Yle said that it came as a surprise that the rooms were empty and had, for example, no ceiling lights. A school representative had taken them to a local general store to buy air mattresses.

A representative of the school told Yle that they offered to buy beds on behalf of the students several months before the start of the studies, but the students did not respond. After the students' arrival, locals were shocked to learn that the students had gathered up mattresses meant for garbage disposal so that they would not have to sleep on the floor, as some of the students reportedly had no money to buy new mattresses. All 26 students also shared a single washing machine. The parish organised a collection to help the students. "Some of the students were outside, and there were four wet mattresses leaning against the wall. They had tried to dry them. No Finn would sleep on such mattresses, it's appalling", commented a local volunteer.



¹⁹³ Source of the case example: Yle 18 Mar 2025.

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CASE EXAMPLE 9

In the Yle article some of the students said they were under the impression that they could get a discount on the following year's tuition fee and earn some money during their studies by getting a job. According to the school, they assist the students in getting work placements and jobs in the care industry. There are many elder care units in the region, which could, reportedly, potentially employ the Philippine nurses.

What kind of indications are there of sexual exploitation and exploitation in forced marriage?

DURING THIS SCOPING REVIEW, some interviewees highlighted subtle signals of international students potentially being exploited sexually. This has also been raised in media concerning the case of commissioned education of Kenyan students (see case example 10), where according to media sources, some of the students had resorted to selling sexual services to sustain themselves in Finland.

Due to the sensitive nature of the issue, the persons affected are unlikely to bring it up in casual meetings. They may feel ashamed or fear losing their right of residence. In an informal discussion with victim service providers, the professionals saw the difficult economic situation of international students as a factor that may potentially lead to so-called survival sex, for example, where sexual services are exchanged for e.g. housing. In addition to students themselves, their spouses could also end up in such potentially exploitative situations in order to pay back debts or to be able to support their families. Limited access to health care services, including sexual health care services, and stigma may hinder the identification of such cases of sexual exploitation.

Students or their spouses may also end up in situations of forced marriage, where one spouse or both are forced to marry without their consent. In the Finnish context forced marriage is criminalised mainly as a form of trafficking.¹⁹⁴

¹⁹⁴ Jokinen 2025.

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Law enforcement officers interviewed in HEUNI's previous forced marriage-related EASY project¹⁹⁵ had encountered at least one case where a victim of forced marriage was identified by school staff and referred to the police and to a shelter. In this particular case the student also had false papers and was not in fact an adult at all. Although forced marriage may not be an evident risk among international students or their spouses in Finland, educational institutions may encounter situations where students live in precarious situations and may need help. Some of the students may also face the risk of forced marriage after their return to their home country.

At the global level countries like Canada have identified the risks of sexual exploitation of international students.¹⁹⁶ The risks increase if female students, in particular, arrive without support networks, financial safety nets or lack of knowledge of the legal system. In Australia and New Zealand, a 2015 survey of migrant sex workers (N=412) found that many had originally migrated to study or were current or past international students.¹⁹⁷ Some sources also indicate that Australian visa system is misused to bring vulnerable migrant women on international student visas to be exploited in brothels under poor terms.¹⁹⁸

In the Netherlands, SHOP, the knowledge centre for sex work and human trafficking raised awareness of human trafficking risks among (international) students in 2025, stating that young people who temporarily live and work in a new city may be vulnerable for sexual exploitation. Another issue identified by the organisation is the subletting of student apartments which are subsequently used for sexual exploitation.¹⁹⁹

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¹⁹⁵ [EASY. Increasing dialogue, awareness, and victim-centred support for victims of forced marriages.](#)

¹⁹⁶ Global News 23 Oct 2024; The Walrus 18 Aug 2021.

¹⁹⁷ Renshaw, Kim, Fawkes & Jeffreys 2015, 63.

¹⁹⁸ Boucher & Kumar 28 Feb 2025, 3.

¹⁹⁹ SHOP 10 Oct 2025.

Could international students be exploited in criminal activities?

THERE ARE SOME INDICATIONS that international students may also be vulnerable to exploitation in criminal activities. Such cases have emerged for example in the UK²⁰⁰, Ireland²⁰¹ and Australia. According to the Australian Federal Police, criminal networks are targeting university students with fake “sidehustle” job ads that appear legitimate but are designed to exploit them. The criminal networks target especially first year students to launder illicit money or steal their identities.

A common tactic involves tricking students into acting as “money mules,” where criminals move illegal funds through the student’s bank account in exchange for a small commission.²⁰² The Finnish police has also reported that criminals may especially recruit young people as money mules which makes them complicit to money laundering. Typically, young people are approached by criminals in bars, shopping centres, messaging platforms, or social media. Offenders typically ask them to receive money into their bank account and withdraw it for a fee, often providing a seemingly credible backstory. Young people may not realise that by doing so, they are participating in money laundering.²⁰³ Also according to Swedish police, it is estimated that 70% of the money mules in Sweden are children, teenagers, or young adults who are not always aware of the consequences.²⁰⁴ UK Universities have also identified the problem and there is a resource available to educate students on the risks of money muling.²⁰⁵

What are the risks related to clients in commissioned education in Finland?

STUDENTS CAN ATTEND FINNISH higher education and vocational education institutions as “regular” degree students or through commissioned education. Commissioned education can be commissioned and paid by a company, a state or a public organisation, an international organisation, or a foundation. The client has the right to charge fees from the students

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²⁰⁰ National Crime Agency. n.d.

²⁰¹ Banking & Payments Federation Ireland: FraudSMART 18 Sep 2024.

²⁰² Australian Federal Police 27 Mar 2025.

²⁰³ Police of Finland 9 Oct 2024.

²⁰⁴ Swedish Police 2024

²⁰⁵ The Crooks Project n.d.

participating in the commissioned education in accordance with the legislation of the state in which it is located or its own practices. The payments required by the client may be higher than the tuition fees of degree students.²⁰⁶ The students cannot pay directly to the education provider, so there has to be a client of the commissioned education. The status of students in commissioned education does not fully correspond to so-called regular students. For instance, they are not entitled to student health care services provided for degree students in higher education.²⁰⁷

Problems have been uncovered between educational institutes and some clients of commissioned education, which have put students in unreasonable situations. Companies commissioning education have charged students fees that are very high in relation to the income level of the students' home countries. For example, the Ministry for Foreign Affairs has reported on students of cleaning services and social and health care from rural Kenya investing up to €19,000 to study and move to Finland.²⁰⁸ Some clients of commissioned education have defaulted on their payments to the educational institution.²⁰⁹ Untrustworthy partners in third countries have also given false information to the educational institutions and the students, and even embezzled the money paid by the students.²¹⁰ Potential risks include corruption, fraud, and other unethical and criminal practices.

In the background survey circulated for this review, two out of five respondents said that their employer offers commissioned education for international student groups in the form of degree programmes, joint programmes with foreign educational institutions, and as shorter, e.g., diploma courses and continuing education. Seven respondents mentioned encountering some problems regarding commissioned education, including confusion about the status of students in commissioned education vs. degree programme students, and problems with clients withholding payments, misleading the institutions, or using subcontracted agents who have misinformed applicants.

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²⁰⁶ Ministry of Education and Culture 17 Sep 2024.

²⁰⁷ Act on Student Healthcare for Higher Education Students (695/2019), 2 §.

²⁰⁸ HE 143/2025 vp, 4–5, 12.

²⁰⁹ HE 143/2025 vp, 4–5.

²¹⁰ HE 51/2024, 15; HE 143/2025 vp, 9.

CASE EXAMPLE 10

Commissioned healthcare education – money potentially embezzled by Kenyan authorities

Several Finnish education institutes have made contracts for commissioned education with three Kenyan counties. The agreements were worth several million euros, and the plan was to bring nearly 800 students to 11 Finnish universities of applied sciences and vocational institutes to study, e.g., nursing, cleaning and engineering.²¹¹ Education export company EduExcellence, owned by three Finnish universities of applied sciences, made the agreements. EduExcellence announced the cooperation and stated that the Kenyan county administration will cover the costs of the studies and accommodation.²¹²

In the first phase, about 300 students arrived in Finland. However, in spring 2023, the Kenyan counterparts failed to fully pay the Finnish educational institutes, leaving the students in a difficult situation. One of the schools, Laurea University of Applied Sciences, threatened to end the students' studies if the payments were not made. In addition, the students' rents were only partially covered. The apartments had been organised by Kenyan company, SkillDove, who, according to the media, acted as the middleman in the agreement.²¹³

There have been allegations that the students and their families have paid for the education themselves through the Kenyan counterpart, who was suspected of embezzling at least part of the money.²¹⁴ According to a MOT investigative piece, the students paid money to the account of an educational foundation governed by a Kenyan county. County officials then transferred €3,000 to each student's account so that they could apply for a residence permit. After the permit was granted, the money was transferred back to the foundation's account.²¹⁵ According to media sources, some of the Kenyan students had resorted to prostitution to sustain themselves in Finland while others had taken on poorly paid jobs or collected deposit bottles.²¹⁶ In the end, at least some of the students found employment in Finland and were able to remain in the country.²¹⁷

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²¹¹ Suomen Kuvalehti 16 Feb 2023.

²¹² Laurea 31 Jan 2022.

²¹³ Suomen Kuvalehti 16 Feb 2023.

²¹⁴ Aamulehti 24 Aug 2023.

²¹⁵ Yle 18 Sep 2023; see also MOT 18 Sep 2023.

²¹⁶ Ibid.; Yle 29 Apr 2023.

²¹⁷ Yle 19 Feb 2024.

Students from abroad have also applied to Finnish vocational schools without a commissioned education scheme. An interviewed vocational school principal said that they received, at the most, 500 applications from outside the EU to a single program, which caught them off guard. The school found out that the increase in international applications was due to a broker who had assisted students in applying. They are also continually contacted by these middlemen in hopes of cooperation, but the school has refused the offers.

What specific challenges concern underaged secondary level students in Finland?

ANOTHER RISK AREA WHICH was identified in the scoping review was the recruitment of under-age students into rural Finnish secondary schools. The students are usually 16 years old and mainly, but not exclusively, from Asian countries such as Uzbekistan, Vietnam, Myanmar, Thailand, China and Iran.²¹⁸ These children are brought to Finland to study in Finnish in rural high schools mainly by a Finnish company that charges the parents of the children for their services, e.g., language and orientation courses, as well as the high schools for advertising them to the candidates. The children's young age has raised questions among the Finnish experts consulted for this scoping review about whether their rights and needs as children are being met, and who will offer them concrete help if they face problems or are in need of support.

A key risk is that underaged children are in Finland without their legal guardians. There has been some public discussion on the ethics and practicalities of bringing 15–16-year-olds to Finland from a different continent and without social safety nets. In 2024, the then Minister of Education highlighted the risks of students arriving without their guardians or families and that there is no clear party responsible for them if problems occur.²¹⁹ In 2022 the Ministry of Foreign Affairs published a memorandum on the phenomenon, co-authored with the Ministry of Education and Culture. According to the ministries, bringing foreign students to Finnish upper secondary schools

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²¹⁸ Yle 3 May 2024 (a); 17 Feb 2025.

²¹⁹ Yle 3 May 2024 (b).

is not illegal, but the law governing upper secondary schools (*lukiolaki*) is not meant for this type of activity.²²⁰

The Finnish Ombudsman for Children evaluated children’s rights and needs in relation to underaged students coming to Finland and stated that separating children from their families can only be justified when it is necessary for the best interest of the child.²²¹ The Non-Discrimination Ombudsman has also voiced concern about bringing underage students to Finland without their guardians, describing it as “ethically unsustainable”, as well as about international students in secondary education potentially facing financial problems similar to those encountered by tuition fee-paying students in higher education.²²²

According to two of our interviewees, the children’s parents have, in some cases, given letters of authorisation to, e.g., the company that brings students to Finland or the upper secondary school teachers, but in most issues concerning children, these documents have no legal significance. In some municipalities, school staff and other locals have begun acting as unofficial support families for the international students. On the one hand, this can help students get to know the Finnish culture and integrate into the local community better. However, on the other hand, as mentioned by one of our interviewees, if the families are not vetted and registered like for example host parents for exchange students are, potential risks in a person with improper motives volunteering as a support person cannot be ruled out.

While parents can communicate with their child online and potentially use the communication and administration system Wilma for exchanging messages with their child’s teachers, concrete oversight on their child is difficult without a physical presence in their life. Secondary education is available in the children’s countries of origin, so the necessity of separating the child from their parents in order to attend upper secondary school in Finland was questioned by some of the interviewed experts.

An interviewed social worker with experiences in working with such students called for a clearer and a legally compliant system in response to who is responsible for the children

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²²⁰ Ministry for Foreign Affairs 7 Dec 2022.

²²¹ Ombudsman for Children 19 Oct 2022.

²²² Non-Discrimination Ombudsman 19 Aug 2025.

coming to the country. She also raised concerns about a potential scenario, where a child gets into trouble – e.g., commits a crime – in Finland. If the parents cannot be contacted, or it cannot be verified that they are indeed the child’s parents, the situation becomes a child protection issue, and a legal guardian will be appointed. If the child was then unwilling to return home, possibly because of shame or fear, how to proceed next would be unclear.

” **There have been some cases where there’s been a single, quite minor criminal case, based on which I’ve started to wonder ‘who is this person’ and where do they live and who is their guardian, because none of the usual processes are possible in their case. Normally you would contact the guardians and discuss the issue and think about the services, but these children don’t have any information about a guardian anywhere or if you’re able to dig it up – is it legitimate, has it been verified? And they have no municipal status so there’s no information about them anywhere. I had to put in a lot of effort because of a single small criminal case before I understood what this is about, because there was just an address to some dormitory.**

– Representative of a wellbeing services county, Interview 7.

The interviewee had also encountered situations in which a child’s circumstances and whereabouts after leaving Finland became a mystery: in one case, the school’s principal had asked a child to contact them when they had arrived in their home country but never received any word.

The second key risk concerns different types of unreasonable contracts. Interviewed experts noted that some under-age students or their families may have also signed contracts where they agree to certain behavioural standards, such as not abstaining from all substance use, but it is unclear what would really happen if the students would not follow these rules.

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” **These students arriving in the country are usually required to sign quite strict agreement forms outlining what they are allowed and not allowed to do here. If they break those rules, they can be told to leave immediately. There have also been situations where a young person has broken, for example, dormitory rules – such as being out at night or using some kind of substance – and they are given a week to leave the country.**

– Representative of a wellbeing services county, Interview 7.

Other practical issues regarding contracts include problems in opening a bank account because it cannot be done by a person under the age of 18. This may lead to the students being in possession of large amounts of cash, which may be stolen or lost.

The third key risk comprises of exorbitant fees paid for language courses and orientation which may result in debt and pressure for the child. According to media articles, the children’s families have paid large sums for, e.g., Finnish language courses before the child has come to Finland and applied for a study place in an upper secondary school.²²³ Similarly to international degree students, when an upper secondary student’s family has paid a large sum of money, it can put pressure on the child to succeed in their studies in their new home country. Furthermore, studying upper secondary school subjects in Finnish, in the same schedule as Finns, can be very demanding for someone who has only learned the language for some months. These difficulties have been described in various media articles where the children have been interviewed.²²⁴

A representative from the Ministry of Education and Culture interviewed for this review found it contradictory, that Finns seek to keep rural upper secondary schools alive so that their children would not have to attend school in another municipality, but the way to achieve this is through recruiting students not from other municipalities, but other countries, and even continents:

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²²³ Ittalahti 9 Jun 2025; Yle 3 May 2024 (a).

²²⁴ See e.g., Helsingin Sanomat 26 Nov 2023.

” [Q: How do you see the fact that many of these smaller municipalities argue that this way they can keep the upper secondary school running and provide local youth with access to upper secondary education? Do you think this works?]

” And the same people then argue that the school should remain there because their own fifteen- or sixteen-year-olds are not mature enough to move to the regional centre for upper secondary studies. So, isn't there some contradiction here? I find it problematic, if we think that Finland's future is secured by bringing underage children here. Well, to me that sounds rather strange.

- Representative from the Ministry of Education and Culture, Interview 2.

Finland as well as the other Nordic countries are also bound by international instruments, such as the United Nations' Convention on the Rights of the Child, to uphold the rights of children. Several of the treaty's articles are relevant in a situation where a child is studying abroad without parental accompaniment. Some of these are collected below:

United Nations' Convention on the Rights of the Child

BEST INTEREST OF THE CHILD (ART. 3): All decisions and arrangements must prioritize the child's best interests, including education, living conditions, and guardianship abroad.

PARENTAL RESPONSIBILITIES AND GUIDANCE (ART. 5): States must support the role of parents even when children are abroad, ensuring mechanisms for continued parental involvement and oversight.

SEPARATION FROM PARENTS (ART. 9): Separation should only occur when necessary and in the child's best interest. The child has the right to maintain regular contact with parents.



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PROTECTION FROM ABUSE AND NEGLECT (ART. 19): Host countries and institutions must ensure the child is protected from all forms of abuse, neglect, and exploitation.

PROTECTION OF CHILDREN WITHOUT FAMILIES (ART. 20): Children temporarily without parental care are entitled to special protection and appropriate alternative care arrangements.

RIGHT TO EDUCATION (ART. 28): The child's right to quality education must be upheld, with attention to their development and cultural identity.

PROTECTION FROM ECONOMIC EXPLOITATION (ART. 32): Children must be safeguarded from labor or responsibilities that interfere with their education or well-being.

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Risks after the studies

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This section looks at the risks of exploitation that international students may face after their studies, i.e. after they have graduated, or after they have terminated or discontinued their studies without graduation. This section does not provide an in-depth overview because the interviews and other materials used in this scoping review provided limited information about what happens to students after they graduate.

ALTHOUGH OUR DATA ARE limited, it nevertheless indicates that many of the same risks that may affect international students during their studies may also affect them after graduation, or after they suspend their studies or fail to graduate. These include problems with **sustaining themselves** in Finland and **poor working conditions**. The risk is particularly pronounced if the student has accrued a significant debt due to recruitment costs, tuition fees, and the cost of living in Finland. The current labour market situation in Finland is also particularly dire, and it is difficult to find work, despite having a degree. International students may therefore end up in a situation of labour exploitation also after they have graduated. In addition, students who suspend their studies or fail to graduate, or graduate but cannot find employment but remain in Finland, may risk becoming **undocumented**.

What are the challenges in relation to finding work after the studies?

AFTER GRADUATION FROM A higher education institution, it is possible for graduates to stay in Finland for two years to search for a job. In fact, Finland strives to ensure that 75 percent of such students stay and find a job in the country after

graduating.²²⁵ The employment rate after studies for those who have come to Finland with a student residence permit is, on average, high compared to people with a foreign background in Finland. The data may be somewhat outdated, but in 2022 of those in Finland with a student residence permit, 52 percent of university graduates and 58 percent of university of applied sciences graduates were employed one year after graduation²²⁶. A significant share of those who had completed their degree had, however, moved away from Finland.²²⁷

It is important to note that there are differences in the employment opportunities by sector: international graduates find employment more easily in the health and wellbeing sectors as well as in computer science and telecommunications.²²⁸ Indian nationals are more likely to stay in Finland after graduation compared to other nationalities.²²⁹ The share of staying graduates in Finland (42%) is slightly higher than in Sweden (40%) but significantly lower than e.g. in Germany (58%).²³⁰

Some of the international students interviewed for this scoping review had sought employment from or applied to doctoral programmes at the university, because academia was seen by them as an environment that was safe and welcoming to foreigners. The role of the education sector as an important employment avenue for international graduates is also confirmed by data from the Finnish National Agency for Education.²³¹

In a 2023 study by the research institute E2 nearly half of foreign students surveyed (n=600) planned to leave Finland after graduating.²³² Issues faced by migrants include, for example, employers undervaluing skills acquired abroad, difficulties in accessing networks, and family members having trouble adjusting to life in Finland. One third of respondents to the E2 survey said that they considered their career advancement opportunities poor if they remained in the country. The respondents expressed needs for support in learning Finnish or

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²²⁵ Finnish Government 2021.

²²⁶ Ministry of Economic Affairs and Employment 2025, 71–72.

²²⁷ Ibid., 72.

²²⁸ Lähdekorpi 28 Oct 2025.

²²⁹ Finnish National Agency for Education 28 Oct 2025.

²³⁰ Lähdekorpi 28 Oct 2025.

²³¹ Finnish National Agency for Education 28 Oct 2025.

²³² Välimäki, Pitkänen, Niemi & Veijola 2023.

Swedish, in searching for jobs, and in finding opportunities for networking with Finnish employers.²³³

The scoping review makes it very clear that the same challenges of finding employment that the students encounter during their studies, also continue after their graduation. Graduates may find themselves at their most indebted, which can even increase their vulnerability. An interviewed assistance provider highlights:

” Students have sold their houses, land, their possessions. By the time the student is sent here, the cost to their family may already amount to [tens of thousands of euros]. Then they study here, paying upwards of ten thousand euros per academic year. And when the studies are completed, if they even get that far, the total amount they have spent by that point could approach 100,000 euros. It is reasonable to ask: when will this ever pay off?

– An assistance provider, Interview 5.

The review also reinforces the understanding that the Finnish labour market is difficult for those who do not speak Finnish or Swedish. Based on the scoping review language skills emerge as one crucial element of integration and employability, yet not all students feel that they receive sufficient language training as part of their education.

” Even if you graduate, there might be no jobs for any professional [...] Schools especially need to be honest about the procedures in Finland. How am I going to learn Finnish for example?

– International student, Interview 13.

The situation may be especially difficult at the moment, considering the overall rate of unemployment in Finland. Recent studies indicate that persons born abroad account for more

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²³³ Ibid.

than 40 percent of the current growth in unemployment in Finland.²³⁴ This increase is related also to the increase in the number of migrants in the Finnish labour market, in particular after 2022.²³⁵ It is not possible to assess in this scoping review to what extent the increase in unemployment among migrants is related to the number of international students in Finland. While the underemployment rate is high, at the same time there is a clear need to have more skilled workers in many sectors such as social and health care sectors given the aging population. As outlined by Representative of the Ministry of Education and Culture such work force is not available at the European level, which forces countries to look for talent overseas.

” The situation, however, is that if we want to attract international students and skilled workers and expertise to Finland, and if we also want them to find employment and contribute to our society and sustainable growth, then the reality is that there are not too many people available anywhere else in Europe either. So, we automatically turn to regions outside the EU. Sometimes I feel that in this discussion people think it would be nice if the students came from familiar neighbouring countries – and of course some mobility will come from there as well – but if we think about the broader objective the fact is that the whole EU is currently struggling with demographic developments, and the whole EU is trying to attract talent from outside the EU.

– Representative of the Ministry of Education and Culture, Interview 4.

To strengthen the retention of international students in Finland, the current government is implementing the Talent Boost programme which is designed to ensure that international talent is recruited into the Finnish labour market. The

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²³⁴ Lähdemäki 9 Jan 2026.

²³⁵ Pesola & Korpela 23 Oct 2025.

programme also focuses on promoting retention in Finland for work after graduation. According to the programme, all higher education institutions are currently running Talent Boost projects that support the strengthening of international students' links to working life, new ways of learning Finnish and Swedish, as well as the recognition, complementing and integration of their skills.²³⁶ However, one interviewed educational policy expert noted that the policies of the government are somewhat contradictory, as it is, at the same time, also limiting the rights of migrants, including students.

” I find it curious that on the one hand side, Finland has a massive national talent attraction and retention program, but simultaneously our national politics and immigration regulation is being tightened and are trying to make it harder to stay in the country. So why is the same country on the one hand trying to put massive resources into attracting people and asking them to stay and then making it almost impossible for them to stay?

— Educational policy expert, Interview 9.

How do the segmentation of the labour markets and structural discrimination affect international graduates and their risk of labour exploitation?

THIS SCOPING REVIEW SHOWS that (informal) recruitment channels and structural discrimination intertwine in a manner that may create risks of exploitation. A study among international students, who had graduated with a bachelor's or master's degree from Finland, noted that informal job-seeking strategies were overall more important than using formal channels.²³⁷ This was echoed by the interviewed students in this scoping review. In one interview, the students also discussed the difficulty

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²³⁶ Finnish Government 2024, 13.

²³⁷ Alho 2020.

of bringing up issues such as unfair treatment at the workplace, as they feared being labelled as ungrateful.

” The only way you get jobs is through your networks. You can’t afford to burn a single bridge.

– International student, Interview 12.

At the same time, however, relying on networks of co-nationals may channel them into jobs that do not correspond to their education and professional ambitions. For example, the Vietnamese community could be of help in finding jobs in Vietnamese restaurants.²³⁸ While the social and cultural aspects of networks of co-nationals may be important, the graduates interviewed by Alho in his study deemed such networks irrelevant for finding suitable jobs, as most jobs on offer through the established immigrant communities are relatively low-status.²³⁹

International students and graduates in Finland may thus find themselves in a segmented labour market and in positions that do not correspond to their level of education. The discussion around the division of the labour market into tiers and segmentation is not new. The segmentation is closely related to structural changes and globalisation over the past decades²⁴⁰ as well as continued policies and practices that push also high-skilled migrants in low-status jobs in the peripheries of the labour market.²⁴¹ Furthermore, migrants themselves may counterintuitively reinforce exploitative labour market practices by, e.g., lowering their expectations of the kind of work that is acceptable to them. However, instead of focusing on individual migrant agency or skills, more attention should be paid to the structural factors that prevent migrants’ success in the labour market.²⁴²

The juxtaposition of structural versus individual factors was raised in some of the interviews with international students in Finland. As one student noted, educational institutions

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²³⁸ Ibid., 14–15.

²³⁹ Ibid., 14–15.

²⁴⁰ Ollus 2016, 45–47.

²⁴¹ Ndomo, 2024.

²⁴² Ibid.

aim to support students in finding work, but the initiatives may merely pay lip service to addressing the fundamental structural problems of the Finnish labour market.

” At least [my university] holds a lot of workshop type things like edit your CV, how to do an interview, how to network. So it tries to do a bunch of those things. [...] Essentially the seminars are just individualizing the problem. They’re saying that it’s your CV that’s crap and not that the job market is broken. So like, yeah, it’s not necessarily super helpful, but at least there’s some kind of attempt.

– International student, Interview 12.

According to a Swedish study, the structural obstacles also include suspicions towards highly skilled migrants.²⁴³ Employers and organisations may fear that efficiency is affected by limited language skills, that clients do not want to work with foreigners, or that migrant employees may not fit in with the rest of the staff. International graduates may thus end up in positions below their education and skill-level, such as internship or volunteer positions, and need to work harder than others to demonstrate their worthiness.²⁴⁴ A representative of the Finnish Immigration Service described how some international graduates in Finland end up in precarious positions in the labour market that do not correspond to their degree.

” We see a lot of zero-hour contracts and platform-economy workers. Of course, there are also those who find good jobs and manage to work in their own field, but there is a great deal of activity related to starting small platform-based businesses, as well as zero-hour contracts in restaurants and construction work.

– Representative of the Finnish Immigration Service, Interview 18.

²⁴³ Risberg & Romani 2021.

²⁴⁴ Ibid.

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A specific concern that was raised by a trade union representative was that international students in apprenticeship training are treated as care assistants instead of as practical nurses, which affects not only their salary but also their position in the workplace. In addition, the respondent mentioned that while students may work during their studies, when they graduate, in some cases their employer has suddenly raised concern about their language skills and deemed these insufficient, concluding that the graduated nurse is unqualified, ultimately dismissing the person. However, if a person has completed a vocational qualification in Finland in Finnish or Swedish, this is considered a sufficient language qualification.²⁴⁵

” I asked the employer directly: why did you recruit this person for this position five years ago? They said, ‘Well, you surely remember what the employment situation was like back then – we had to take everyone who was even remotely capable’. That was the reason, exactly like that. It ended up this way because there are areas in Finland with a very severe labour shortage, where employers are essentially forced to hire all available qualified personnel.

– Trade union representative, Interview 19.

One interviewed educational policy expert drew a direct link between structural discrimination and the risk of exploitation when international students and graduates cannot find employment except among unscrupulous employers.

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²⁴⁵ Finnish Supervisory Agency n.d.

” When the students or work-based immigrants who want to stay in Finland, they need to eat like anyone and they need to have a job, but regardless of what they do to try to become as employable as they can – even those who do, even they struggle because of structural racism and discrimination and the unwillingness of Finnish employers to employ them. Higher education institutions can’t force employers, and the individuals can’t force employers. Exploitation might occur when there are employers who unscrupulously employ internationals, knowing how desperate they are. [...] They employ them on part-time contracts, on zero-hour contracts, on lower pay without social security.

– Educational policy expert, Interview 9.

Based on the findings of this scoping review, we identified some situations where persons who have graduated from Finnish educational institutions have ended up in exploitative working conditions. As an example, one interviewee from an integration service provider supporting international students had encountered persons from India and Bangladesh, who had graduated from Finland, but were afraid of being deported unless they find work. They therefore ended up taking jobs in a fast-food chain, where they faced poor working conditions.

The question of international graduates who cannot find work and end up without documentation/residence was not discussed at length in the interviews of this scoping review. It is clear that some former students may choose to remain in Finland without documentation rather than return to their country of origin, which places them in a vulnerable situation. Some students may also be unable to graduate for various reasons – such as not being able to cover their tuition fees or having to work instead of studying to subsist – but wish to stay in Finland, and who face exposure to risks of exploitation as a result of their precarious status. Further research would be necessary to assess the prevalence of such cases.

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Part III

Addressing the risks of exploitation: Human rights due diligence in (higher) education

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In this section of the scoping review, we look at how Finnish education institutions have applied the principles of social sustainability and human rights due diligence to their work.

AS THE PREVIOUS SECTIONS have indicated, there are pronounced risks of exploitation that affect international students before, during, and after their studies in Finland. In this section we first outline the **principles that guide human rights due diligence**, and argue that these apply to education institutions, even in situations when the education on offer is not necessarily profit-driven. We then look at what Finnish **education institutions currently do** to address social sustainability issues. We then outline the **elements of a comprehensive human rights due diligence process** with examples from the UK and Australia, in particular. Finally, we provide a **simplified template/checklist for a comprehensive process**, suited to the Finnish and Nordic context.

What are the UN Guiding Principles on Business and Human Rights?

THE UN GUIDING PRINCIPLES on Business and Human Rights (UNGPs) outline the obligations for states and business enterprises on respecting human rights. The UNGPs consist of **three pillars**: the state's duty to **protect** human rights, corporate responsibility to **respect** human rights, and victims' access to **remedy**.²⁴⁶

The human rights due diligence process requirement forms the core of the UNGPs. It constitutes a highly relevant framework for educational institutions, in particular those institutions that actively market their education in other countries and work together with recruitment agents, even in situations when the explicit aim of the marketing is not commercial profit. It provides the framework for establishing the governance and management structures and comprehensive policies necessary to embed human rights due diligence throughout the organisation and its processes, with the purpose of preventing and addressing adverse human rights impacts. In the case of the education institutions covered by this scoping review, such adverse impacts include, especially, the indebtedness of students, their economically precarious situation in Finland, and their subsequent risk of exploitation.

The UNGPs require an organisation to conduct a risk based human rights due diligence process in its operations and its value chain. This encompasses conducting a **risk assessment** on the organisation's operations and value chain, **acting on the risks identified** through preventing and addressing exploitation, **remediation in response to any actual cases** of exploitation, **measuring performance, revising processes** as needs are identified, and **communicating** on its performance and actions internally and externally.²⁴⁷ Embedding these due diligence process elements into existing processes takes time and it is a reiterative process.

Engaging with rights-holders is a foundational element in the whole process. In the case of international student recruitment and addressing unethical conduct of agents, engaging with students is a key element in identifying and addressing misconduct.

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²⁴⁶ See OHCHR 2011.

²⁴⁷ OECD 2018.

What due diligence process measures do Finnish higher education institutions currently carry out in international student recruitment?

BASED ON THE SURVEY conducted among Finnish higher education institutions as part of this scoping review, respondents widely recognised that education providers have an important role in ensuring that prospective students have correct information about life in Finland. According to them the challenges faced by students are often linked with having misguided assumptions about the cost of living and of the possibilities of finding part-time work in order to fund their tuition and living costs.

Firstly, respondents considered that the responsibility of educational institutions lies in providing accurate information to prospective, actual and admitted applicants. Secondly, respondents perceived that education institutions have a responsibility in carefully selecting the agents they use, to monitor them during the collaboration phase, and end any contract when their partner violates its ethical commitments. The respondents also raised several key actions that they have either taken, or that they consider fundamental. Next, we provide an overview of the key actions taken by educational institutions.

Providing information on the cost of living: A part of the surveyed education providers said that they have put effort into informing prospective and current applicants about the cost of living, the high likelihood of not being able to secure part-time work to finance studies, as well as about realistic salary levels of such work. Respondents considered this a measure that helps counter misleading marketing that may serve as a precursor to exploitative situations.

Disclosing information on accredited recruitment agents: Some respondents mentioned that the educational institution has published the list of partners that they work with in student recruitment, directing prospective students to official channels. Publicly disclosing the contracted and monitored agents supports students in the informed choice of an agent and facilitates the identification of any unofficial agents. It provides visibility to all stakeholders regarding which agents are officially involved in the recruitment. It is noteworthy, that public disclosure of contracted agents is a requirement made by the Australian Government's Tertiary Education Quality

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and Standards Agency (TEQSA) to Australian universities.²⁴⁸ Providing information on contracted agents was also mentioned in several interviews conducted for this review, e.g. by a government representative:

“ We can take measures to make it transparent to applicants that if they use these agents, which are genuinely common in certain countries and regions, such as in Asia, they will know what the higher education institution’s website states about, for example, which agents it has formal cooperation with. And that there are certain rules and procedures in place for how we work with those agents.

- Representative of the Ministry of Education and Culture, Interview 4.

Selection of recruitment agents: In order to ensure ethical agent conduct, higher education institutions reported on having a form of **selection criteria** that acts as a support in choosing more reliable partners. Having exclusion criteria at the stage of sourcing agents is a first step.

Based on the responses to the survey, **at the contracting stage higher education institutions have in many instances required specific contractual commitments** and a commitment to the agent Code of Conduct in their agent contracts. Contractual commitments form the foundation for ethical collaboration and in cases of severe or repeated unethical conduct enable the sanctioning or termination of the relationship.

Oversight of recruitment agents: At the contractual phase, conducting monitoring of the agents was brought up by several respondents. This is in line with human rights due diligence. When operating with high-risk partners, i.e., partners that are either assessed as not having sufficient processes or resources in place to prevent or address adverse impacts to individuals, or partners operating in high-risk environments, additional means to monitor those partners are to be in place.

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²⁴⁸ Australian Government: Tertiary Education Quality and Standards Agency 4 November 2022.

Some survey respondents also brought up provision of training and regular contact and exchange of information as forms of supporting their agents. Some higher education institutions invite their agents to visit Finland. Such engagement can be seen as a form of leverage towards partners to prevent and mitigate the risk of exploitation.

The institutional due diligence process was also discussed in the expert interviews. An interviewed representative of a higher education institution highlighted the importance of doing background checks, having written contracts, and the need for robust monitoring and open communications with the approved partners:

” Our starting point is that we do not enter into partnerships with just anyone. We do our background checks, either through an [accreditation] organisation or through other higher education institutions. [...] The contracts must be such that all potential challenges identified are written down, and there must be concrete operating guidelines. The contract alone is not enough, but the fact that both parties commit to it gives us leverage: if something happens, we can intervene. There is also monitoring after the contract is finalised and a new partner has been taken on board. On our website, we list all our agents, so that applicants, their parents, and the agents themselves receive the same message: these are our partners through whom one may apply, but it is not mandatory.

- Representative of a higher education institution, Interview 10.

To ensure more uniformity of the oversight of agents, the Finnish higher education institutions have developed joint minimum standards.

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CASE EXAMPLE 11

The Agent Code of Conduct of Finnish higher education institutions

In 2024 the Rectors' Conference of Finnish Universities of Applied Sciences (Arene) and the Council of Rectors of Finnish Universities (Unifi) jointly developed an Agent Code of Conduct (ACoC) that provides the minimum ethical standards that should be followed by agents and used in agent cooperation. The stated aim is to ensure ethically sustainable student recruitment to Finnish higher education institutions.²⁴⁹

The ACoC is a two-page document that lists principles of ethics and standards, as well as outlines five guiding principles: conflict of interest, non-discrimination, responsibility towards host communities, accessibility and inclusivity, and feedback mechanism.²⁵⁰

In addition to the ACoC, higher education institutions utilize Education Finland's Guide to Ethical Practices in Education Export for Professionals.²⁵¹ It provides a short checklist for education institutions to tick off to ensure that they adhere to the ethical guidelines.

While the ACoC provides an example of cooperation in the sector and a step towards setting sectoral standards, it is very limited in scope. The Code would therefore benefit from setting more elaborate requirements, including in relation to the agent's governance and management systems, and training and competence related to Finland's legislation and regulations concerning educational institutions and student recruitment.

The Code of Conduct in itself is not sufficient in putting in place contractual clauses that would define the shared responsibilities and roles in ethical student recruitment, specific rights for the educational institution to obtain information on the agent's conduct, roles and responsibilities in cases of misconduct and the need for providing remediation to a student, or the grounds for terminating the contract in case of unwillingness to adhere to corrective action plans.

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Also other countries have introduced codes of conduct and guidance to higher education institutions, most notably the UK.

²⁴⁹ Unifi 15 May 2024.

²⁵⁰ Arene & Unifi 2024.

²⁵¹ Education Finland 2023.

CASE EXAMPLE 12

The UK Agent Quality Framework

THE UK AGENT QUALITY Framework (AQF) was introduced in 2023. There are nine parts to the AQF²⁵²:

1. A student and parent guide to choosing an education agent
2. National code of ethical practice for education agents
3. Good practice guide for providers using education agents
4. Good practice guide for UK education agents partnering for quality
5. Agent Quality Framework pledge
6. British Council UK certified counsellor training
7. British Council UK agent and counsellor training and engagement hub
8. British Council database of certified counsellors
9. AQF agency management course

The AQF provides a comprehensive framework with guidance and quality assurance tools developed after extensive research with students, education providers, education counsellors and agents. Making the AQF into a legal obligation for higher education institutions in the UK is under discussion.²⁵³

As a foundation, it requires that the UK National Code of Ethical Practice for Agents (2021) is made into a condition in universities' contracts with agents. In the Code the requirements towards the agents are accompanied with guidance on expected practice, as well as suggested evidence on implementation of the expected practice. It thereby puts forward clear explanations of what the expectations in relation to the requirements are in practice, and how the practical implementation of commitments to ethical conduct is concretely expected to be showcased by an agent.²⁵⁴

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²⁵² British Council n.d.

²⁵³ Universities UK 2 Jul 2025.

²⁵⁴ Edified 2021.

CASE EXAMPLE 12

As an example, the Code requires disclosure of evidence in the form of signed written/digital agreements between education agents and student clients that include information about fees, information about themselves and complaints processes.²⁵⁵

The AQF framework requires that “strong governance measures built into the agent contractual cycle” that includes:

- agent selection,
- due diligence,
- contracting, as well as
- training of agent by mandatory UK credited training program.²⁵⁶
- planning,
- ongoing reviews of the agent, and
- eventually contract renewals.

In relation to their applicants, the UK Agent Quality Framework states that universities are, firstly, to promote guidance to applicants on choosing of an agent. Secondly, higher education institutions need to disclose clearly the contracted agents they partner with, and lastly, communicate visibly on the university’s complaints process.²⁵⁷

The AQF provides examples of the building blocks to have in place for a more comprehensive and a coherent approach to exercising due diligence in international student recruitment.

Students are a key stakeholder, and engagement with them provides higher education institutions with an access to critical information. It is a crucial element in the risk management cycle, contributing to identification of any actual cases, updating the risk assessment, and revising actions going forward. Among the survey respondents there were some mentions of conducting engagement with current international students on their experiences with the agents during the application process.

²⁵⁵ Ibid.

²⁵⁶ Ibid.; Universities Scotland 10 May 2024.

²⁵⁷ Edified 2021.

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Importantly, the **availability of a reporting channel** was highlighted by the expert interviewees as well as one of the survey respondents. The presence of a channel and a procedure for reporting and processing concerns and complaints should be actively communicated as an integrated element in communication materials and through various channels taking due note of the relevant languages for distributing the information. Students' awareness and level of trust in existing whistleblowing channels determines whether the channel is genuinely operational.

One interviewed representative of a higher education institution stated that **having a reporting channel** for students to report possible problems they might have with agents is critical. This provides further avenues for monitoring the agencies and facilitates also better dialogue about potential issues and misconduct.

” **It is essential that we also provide a channel for students to report if any misconduct occurs. Even if there is an online form, it depends on culture or the student's individual circumstances whether they dare to report. But these are the kinds of structural elements that must exist. And then, there are discussions and on-site visits. We go to meet the agent's team. It is a continuous process of dialogue and vigilance.**

- Representative of a higher education institution, Interview 10.

Moreover, reverting to students with information on what has been reported and actions taken by the institution as a result, contributes to students experiencing the engagement as relevant and meaningful.

As a concrete action, to address the identified challenges faced by students, the survey respondents reported having **taken action to support students in integration, job seeking, housing**, and conducting multistakeholder collaboration to respond to housing and employment challenges faced by their international students.

The **Agent Code of Conduct for Finnish higher education institutions is a further example of stakeholder cooperation.**

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However, further engagement is needed, including building networks and engaging with international students themselves, who have experiences of exploitation. An interviewed expert from the Ministry of Education and Culture highlighted that education providers are already working actively towards solving the problems related to recruitment of international students.

” There is a willingness to intervene and to find solutions. The institutions have no intention of minimising or overlooking the problem. Higher education institutions want students, especially in fee-charging programmes, who come here and are able to study, without disruptions. No one in the higher education sector wants a situation where just anyone is brought here under any conditions.

- Representative of the Ministry of Education and Culture, Interview 4.

However, based on the findings of this scoping review, it is clear that while education institutions in Finland have taken steps to address adverse impacts to applicants and students within their international student recruitment processes, a full-fledged human rights due diligence process is yet to be implemented. Risks are manifestly present in student recruitment, but they should not be overlooked in other sectors of a higher education institution’s operations and partnerships. Positively, there seems to be commitment at the policy level to ensure that the recruitment of international students adheres to ethical standards, and that the current problems are resolved.

What have other countries done to implement human rights due diligence in the education sector?

In this scoping review we were unable to identify public examples where Finnish education institutions had in place a comprehensive human rights due diligence process. We therefore looked at examples from other countries. Some relevant examples were identified from universities in the UK and Australia.

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A briefing paper by Nottingham University Rights Lab outlines that universities are affected by the issue of modern slavery²⁵⁸ in multiple ways.²⁵⁹ They are sites of exploitation risk, and potential sites of antislavery education, partnership and research. While universities' engagement with the issue of modern slavery is found to remain sporadic and piecemeal, they have the potential to be more fully involved in antislavery efforts, locally, nationally and internationally.²⁶⁰

Universities in both the UK and Australia explicitly fall within the scope of the respective national Modern Slavery Acts transposing the UNGP obligations into national legislative requirements. The UK Modern Slavery Act is a law that requires businesses of a certain size, including higher education institutions to report annually on the steps taken to prevent human trafficking in their operations and supply chains. In comparison, the Australian Modern Slavery Act has similar requirements with an increased emphasis on accountability.

Although none of the Nordic countries currently have an explicit law that governs the responsibility of corporations and businesses to address, prevent and mitigate exploitation in the business conduct²⁶¹, we argue that responsible conduct in line with the UNGPs requires also Nordic companies and commercial actors to address the risks of exploitation in their actions. This applies, in our view, also to education institutions.

Moreover, adverse human rights risks not only apply to international student recruitment. Such risks may also be present in relation to staff, students overall, procurement, investments, research or other sectors of operation. Often the risks are linked to the organisation through its business partners.

As an example, the University of Sydney's Modern Slavery Statement 2024 presents the university's value chain risk mapping that identifies human rights risks in relation to the university's:

- **SUPPLY CHAIN:** IT service, IT hardware, security, construction, cleaning, maintenance, lab and tech consumables, PV solar

²⁵⁸ "Modern slavery" is a term used particularly in the UK that incorporates human trafficking and slavery, servitude and forced or compulsory labour.

²⁵⁹ University of Nottingham Rights Lab 2020.

²⁶⁰ Ibid.

²⁶¹ Such a law will be adopted by EU countries by July 2028 as required by the EU Corporate Sustainability Due Diligence Directive, applicable to companies with over 5,000 employees and 1.5 billion Euro turnover.

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- **RESEARCH:** clinical trials, research partners, research facilities, dual purpose research, AI tech, biotech, etc.
- **EDUCATION:** student recruitment, student placement, student working conditions, students at risk of forced marriage
- **CONTROLLED ENTITIES:** Centre in China, Westmead fertility center, Sydney Vietnam institute
- **INVESTMENT:** publicly listed portfolio, private equity portfolio.²⁶²

Regarding a comprehensive due diligence process covering all operations of a higher education institutions, the University of Sydney's Modern Slavery Statement provides information on its actions concerning its governance structures, integrating and embedding due diligence, innovating on approaches to mitigate risks and address impacts, and continuous improvement. This example gives indication of what elements could be added for attaining a more comprehensive approach to human rights due diligence process.²⁶³

When looking specifically at the risks related to student recruitment, the University of Sydney Modern Slavery Statement reports that the university has included exploitation risks in the university's **student wellbeing risk matrix and standard operating procedures**, thereby also putting concrete actions to address those risks in place. In addition, the university has put efforts into **raising student awareness of exploitation risks** and forms of exploitation. It has conducted student engagement and student-centred peer led approaches that enable students to engage peers on the risks and to refer to support.²⁶⁴

Furthermore, the university has conducted **capacity building to the staff** in identifying risks to students as well as for referring students to support. In some cases, the university collaborated with anti-slavery organisations to conduct these activities.²⁶⁵ UK universities have also developed modern slavery statements as well as more comprehensive frameworks.

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²⁶² University of Sydney 2025.

²⁶³ Ibid.

²⁶⁴ Ibid.

²⁶⁵ Ibid.

CASE EXAMPLE 13

The Nottingham University Slavery-Free Campus Framework

Nottingham University has developed a Slavery-Free Campus Framework (a Blueprint for University Action against Modern Slavery)²⁶⁶, which outlines ways that universities can mobilise their resources and specific contexts as educational communities, employers, buyers, investors, and civic partners.²⁶⁷ The framework provides a structured approach for universities to prevent, identify, and respond to modern slavery risks within their operations and communities. It is built on three pillars:

PREVENTION – Establishing an environment where exploitation cannot thrive through awareness training, robust policies, ethical recruitment, and integration of modern slavery topics into curricula.

DISCOVERY – Detecting and addressing risks through targeted training for pastoral and procurement staff, regular reviews of supply chains, investments, and partnerships, and ensuring compliance with ethical standards.

SUSTAINABLE RESILIENCE – Maintaining long-term commitment by supporting student-led initiatives, involving survivor expertise, and engaging in local anti-slavery partnerships to adapt to evolving risks.

This model emphasises both short-term actions (training, policy implementation, reviews) and long-term strategies (curriculum integration, continuous improvement, civic engagement) to create an exploitation-free academic environment. It proposes concrete actions concerning leadership, policies, procedures and management, awareness and training to students and staff, risk management in supply chain, and civic and wider engagement.²⁶⁸

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²⁶⁶ University of Nottingham Rights Lab 2020.

²⁶⁷ Ibid.

²⁶⁸ Ibid.

What does a human rights due diligence framework look like in the education sector?

THIS SECTION SUMMARISES AND proposes a set of building blocks for a comprehensive due diligence process covering an organisation's operations and partnerships as a whole. These elements can be applied in international student recruitment but is not limited to only this field. Instead, it forms a basis for a comprehensive human rights due diligence framework for educational institutions.

Human rights due diligence requires establishing appropriate governance and management structures, establishing a comprehensive policy, and integration and embedding of due diligence into existing processes of risk management, addressing and remediation of identified cases, **measuring performance, revising existing processes**, and **communicating** on the actions taken. Engaging with rights-holders (i.e. the person who is negatively affected) is essential element especially in risk assessment and identifying impacts. Building the organisation's competences and maturity is a foundational element enabling the process. It must be noted that embedding due diligence is a reiterative process. It may therefore be advisable to start in an incremental manner and ensure continuous improvement.

Next, we outline the key components of a due diligence framework for higher education institutions.

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1. Establishing governance, management and strategy

REGARDING GOVERNANCE, ACCOUNTABILITY AND oversight for addressing exploitation and trafficking should be assigned at **the board level**. For ensuring execution of work in a structured manner, higher education institutions should consider establishing a **cross sectoral working group** or body consisting of representatives of key parts of the organisation, such as student recruitment, HR, procurement, etc. Such a working group would then be in a position to set an **ambition level**, establish an **implementation plan** with objectives and goals, assign **ownership** and secure required **resources** for the work.

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2. Setting a policy, conducting a mapping & conducting a risk assessment

ADOPTING A COMPREHENSIVE POLICY covering all parts of the organisation's operations provides a foundation for the work. The working group should **conduct a mapping** of the stakeholders, partners, subcontractors and supply chains in cooperation with all internal stakeholders. Such a mapping provides a basis for **conducting a risk assessment** on exploitation linked to activities of higher education institutions, such as charging of irregular or illegal recruitment costs and fees. This enables developing a coherent risk-based approach to managing risk of exploitation across the organisation. Human rights risk management should eventually be integrated to the organisation's existing risk management processes.

3. Mitigating risks and addressing of impacts

ACTIONS TO MITIGATE RISK and address identified impacts are dependent on the type, context, and nature of risk or impact. **In the case of international student recruitment specifically**, key actions so far identified in relation to applicants have included targeted and extensive communication of clear information on the cost of living, absence or scarcity of part-time working opportunities, disclosing the list of agent partners, guidance in choosing an agent, and having clear communication of grievance channels. In relation to agents, the cycle includes having clear exclusion criteria and pre-screening of partners, contractual clauses establishing ethical conduct requirements, training and engaging with the agent on ethical conduct, monitoring agent conduct, and engaging with students on their experiences with the agents as key source of information.

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4. Increasing and ensuring organisation's competences

KEY FOR EFFECTIVE ACTION is **increasing awareness of staff and students** on the forms and modus operandi of exploitation and the particular higher education institution's ambition, actions and progress in addressing it. To increase awareness and to enable the organisation to identify, understand and address risks, **training on prevention and addressing** different forms and aspects of human trafficking and exploitation should be integrated into induction of all staff and students. Moreover, the organisation could consider a structured approach to training staff on the organisation's approach to prevention of exploitation as well as any consequent changes to the approach.

SPECIALISED TRAINING SHOULD BE in place for key persons such as personnel in pastoral roles, HR, student services and procurement. This also applies to persons involved in international student recruitment, contracting and onboarding agents.

IN COMMISSIONED EDUCATION AND when working with educational agencies, the parties involved must have enough know-how to operate with international partners and ways to be sure of the partners' reliability. In commissioned education, in particular, institutions involved must be able to assess the risks, including the risk of corruption among partner country organisations.

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5. Using leverage with partners and in procurement

WORKING WITH THIRD PARTIES, when using service providers (e.g. agents) or suppliers (e.g. IT hardware) it is important to design measures for using appropriate leverage towards partners in the contracting cycle. Partner or supplier selection, contracting, onboarding, monitoring, and engagement on ethical conduct should be designed so as to be in line with due diligence. A high-risk partner or supplier requires reinforced actions to ensure that conduct is in line with the requirements. It is important to keep in mind that engagement with the rights-holders is also a key part of this process.

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6. Engaging with rights-holders

ENSURE STRUCTURED APPROACH THROUGH having processes in place for engaging with rights-holders in relation to high-risk operations or partnerships.

7. Establishing a complaints mechanism and grievance processes

ADDRESSING OF LABOUR EXPLOITATION should also be recognised in **the organisation's complaints and grievance** procedures. Their **whistleblowing channel** and procedure should be actively communicated as an integrated part of communication materials and channels to ensure awareness among staff and students.

8. Ensuring the comprehensive collection of data

THE WORKING GROUP TASKED with designing the approach for prevention and addressing of exploitation could consider an established approach to **collecting risk information** from available sources, including grievance procedures, whistleblowing channel, and results of engagement with the rights-holders (such as in the context the international students in the context of student recruitment risks), to contribute to the regular update of the organisation's risk assessment.

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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** a 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** a 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.



Conclusions and discussion

This scoping review emerged from the need to explore less-known forms of human trafficking and exploitation that merit joint Nordic attention. In recent years, Finland has witnessed an emerging public debate concerning the challenges faced by international students, including their experiences of labour exploitation and even sexual exploitation.

WHILE THE REVIEW FOCUSES on Finland, it shows that many of the problems uncovered also apply to the other Nordic countries. However, there seems to be less overall awareness across the Nordic region of the linkages between economic challenges among international students and the subsequent risks of exploitation. As a result, the other Nordic countries have not experienced a discussion of comparable breadth or intensity.

This scoping review addresses the risks of exploitation and the challenges faced by international students in Finland while also offering a briefer overview of the situation in the other Nordic countries. However, it is simultaneously crucial to emphasise that not all international students encounter problems. The majority of students progress in their studies, graduate on time, and do not face exploitation. It is also important to note that there is little evidence of explicit cases of human trafficking in relation to international students in the Nordic region.

Nevertheless, the findings of this scoping review indicate that the risks of exploitation faced by international students are multiphased, systemic, and linked to both external recruitment ecosystems and national policy structures.

Due to an aging and decreasing population, all Nordic countries have introduced measures to attract skilled international labour. International students present a group which could be

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trained and integrated to address future labour shortages. At the same time, many educational institutions in Finland, in particular, are struggling with funding shortages and declining student numbers, creating an increased need to recruit international students. Simultaneously, Finland and other Nordic countries are tightening overall immigration and social welfare rules, while overall unemployment in the region has increased. Taken together, these factors create situations of risk of exploitation among international students.

The exposure to risks may begin before the international students arrive, continue throughout their studies, and in some cases, continue after their studies. The international students usually do not come from the poorest backgrounds as they have the means to take out loans and/or pay agents and cover tuition costs. Risks are, however, not evenly distributed. Instead, intersectional factors such as young age, gender, ethnicity, mental health problems and financial dependencies may affect the situation of individual students and increase their exposure to risks.

Conducting this review and making any conclusions on the topic is challenging, as the issue permeates through different and, at times, conflicting policy areas, such as education, migration, employment, and criminal policy. Different stakeholders have different economic, (geo)political, or societal motivations for, on the one hand, recruiting international students, and on the other hand, restricting the access of third country migrants into the country. In carrying out this scoping review it has become evident that the recruitment of international students may look very different depending on the rationale behind the recruitment.

Is the aim of international student recruitment to offer study opportunities for individuals who would otherwise have no access to higher education, or to train workers to mitigate the effects of the demographic change in the Nordic region in fields that are expected to face future labour shortages?

Or, is the recruitment a measure to expand the funding base of educational institutions who might otherwise struggle to stay afloat as domestic age cohorts decline, and state funding to educational institutions diminishes? Or, is the aim to educate and retain the best and the brightest only, a race in which many

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countries compete against one another globally? These aims are not necessarily contradictory but have different implications for policymaking and international student recruitment.

In addition, the findings of the scoping review raise the question of who is the “ideal international student” that governments and education institutions wish to recruit. Such an ideal student seems to be self-sufficient, does not need social assistance, learns the local language quickly, fully finances their studies and living costs with money accumulated in the country of origin, graduates according to schedule, and when in need of a job, takes on whatever work is available, whether it corresponds to their education or not. However, as the scoping review shows, the reality is often much more complex.

A successful response to the challenges presented in this review will require coordinated action between migration, education and employment policies, and enhanced cooperation between government entities, educational institutions, municipalities and other actors. Furthermore, the scoping review indicates that education institutions must continue to strengthen their human rights due diligence processes to comprehensively address all dimensions of risks of exploitation in international student recruitment.

Next, we present key findings by topic.

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Recruitment pathways contain significant risks before students arrive in Finland

BASED ON THE FINDINGS of this scoping review, international students may be exposed to risks already during their recruitment which may increase their vulnerability to exploitation and trafficking at later stages of their studies. The collected data reveal repeated references to dishonest agents, inflated recruitment fees and costs, misinformation and false promises about employment opportunities in the country of destination, and potentially problematic predeparture training, including expensive language and/or orientation courses.

- **INTERNATIONAL** students and their spouses or families are potentially exposed to **financial risks and dependencies** already before reaching the country of destination, especially when the studies are financed through debt or by selling family property and assets.
- **MANY EDUCATION INSTITUTIONS** co-operate with accredited recruitment agents. Despite accreditation and existing Codes of Conduct, recruitment agents may **charge high fees** for their services and to draw unreasonable contracts with students, sometimes contrary to Codes of Conduct and agreements with education institutions. There is **insufficient oversight** of existing agreements and actual conduct by recruitment agents, as well as an overall lack of regulation.
- **THE ANALYSIS** of case examples shows that certain countries of origin (e.g., in Southeast Asia) may present **systemic patterns of risk** in the recruitment supply chain. Risks exist especially with unofficial or “wild” recruitment agents who are not affiliated with educational institutions but (claim to) assist in the application process. Due to them operating outside contracts with said institutions, regulating their operations is particularly difficult.

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Structural constraints in Finland and the other Nordic countries increase vulnerability during studies

AFTER ARRIVING IN THE country of destination, various economic and institutional factors may create conditions that can heighten exploitation risks during the students' stay. The review shows that prospective students may be overly credulous regarding their chances of finding employment to finance their studies and are still willing to take the risk. Others are misled about the cost of living and employment prospects. Nevertheless, the review confirms that the precarious financial situation is the key underlying risk factor for exploitation among international students.

- **INCOME REQUIREMENTS**, tuition fees, and difficulties securing employment create **economic precarity** for students who had expected to meet these financial obligations through work in the destination country.
- **FINANCIAL STRESS** may make international students more **dependent on unscrupulous** employers, intermediaries or dishonest agents.
- **HOUSING PROBLEMS** (e.g., difficulties in accessing affordable accommodation, unfurnished dormitories, overcrowding) and problems with sustenance further intensify vulnerability.
- **FINANCIAL DIFFICULTIES** also directly affect **accompanying spouses and children**. In Finland, there is evidence that families have had to rely on food assistance to sustain themselves.

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Labour exploitation is a recurring and cross-cutting concern

THE RISK OF LABOUR exploitation is a consistent and well-documented risk affecting migrants in low-income work, on-demand contracts, and platform work, including international students. 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 to exploitative terms of employment or even forced labour situations.

- **INTERNATIONAL** students may face **underpayment, excessive working hours, and dependency on employers.**
- **EXPLOITATION** may affect both students and spouses, indicating a **broader family-level impact.**
- **PLATFORM WORK** may expose students to further exploitation risks. Students may also be recruited into seasonal work or be used in wild berry picking where they face poor and isolated conditions and a lack of proper compensation.

There are indications but limited evidence of sexual and other forms of exploitation

THE FINDINGS OF THIS scoping review indicate that besides labour exploitation, there are some indications of other forms of exploitation that international students and/or their spouses and families may be exposed to. These risks are often poorly identified and understood. There are multiple barriers to seeking help and disclosing such experiences due to, e.g., fear, shame, stigma, threats and a lack of information on the rights and existing legislation.

- **THE REVIEW** presented scattered signs of **sexual exploitation and forced marriage.** However, cases are likely to be **underreported and -documented.** The risks may also concern the spouses of international students and/or their children.
- **LIMITED** evidence suggests that international students could also be exploited in **criminal activities** e.g. as money mules.

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Risks extend beyond the study period and after graduation

THE FINDINGS OF THE scoping review indicate that exploitation risks do not end at graduation, but they may continue afterwards. Because unemployment is currently high in Finland and Sweden, finding decent work can be very difficult even with a local degree.

- **TRANSITION** periods (e.g., looking for work after graduation) may present **continued vulnerability**, particularly if students remain economically or administratively dependent on employers.
- **THERE** are differences based on the **field of graduation**, with e.g., IT presenting higher employment rates.
- **EMPLOYMENT** through informal recruitment channels and through countrymen may steer international graduates towards **jobs that do not correspond to their education level**.
- **STRUCTURAL** obstacles for finding work include discrimination in the labour market. There is a **link between structural discrimination and the risk of exploitation** when international students/graduates cannot find employment except among unscrupulous employers.

Commissioned education introduces additional vulnerabilities

THE FINDINGS OF THE review suggest that commissioned education has been linked to cases of corruption, financial crimes and possible exploitation in Finland. While the recent legislative changes may resolve some of the problems, this is an area which requires stronger safeguards, increased transparency, and partner vetting to prevent risks.

- **WEAK OVERSIGHT OF INTERNATIONAL PARTNERS** can lead to financial irregularities.
- **THE STATUS** of the students with B residence permit is not as strong as with A permits, and the students are also not entitled to student health care services.
- **COMMISSIONED** education models may **shift risks** from Finnish educational institutions onto students and external intermediaries.

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Risks in recruiting international students into Finnish upper secondary schools

THE SCOPING REVIEW HIGHLIGHTS concerns regarding the recruitment of students from abroad to Finnish upper secondary schools and vocational schools. Education providers have received central government transfers for upper secondary education based on the number of students, so attracting international students has allowed rural high schools, in particular, to keep operating. While international students in vocational schools have been mainly adults, the students in high schools are 15–18-year-olds, who often arrive in Finland alone to study in Finnish or Swedish after the initial language studies. Experts and oversight bodies have questioned whether these children's rights, safety and support needs are adequately protected. However, recent legislative changes will introduce tuition fees for students from outside of the EU/EEA, which is expected to affect the recruitment of international students into Finland. Identified key risks include:

- **LACK OF GUARDIANSHIP AND SUPPORT** as children arrive alone, without a legal guardian responsible for their wellbeing or for helping them if problems arise, exposing them to potential risks.
- **PROBLEMATIC CONTRACTUAL PRACTICES HAVE BEEN IDENTIFIED.** Students' families sign contracts with behavioural or other obligations that may be unclear or unreasonable for the children and may result in a return to the country of origin because of their breaches.
- **HIGH FEES AND FINANCIAL PRESSURE CAN ALSO CREATE STRAIN FOR THE CHILDREN.** Their families may pay substantial sums for language and orientation services, creating financial strain and pressure on children to succeed while studying in a foreign language without parental support.

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Human rights due diligence provides an emerging framework for prevention

BECAUSE MANY HIGHER EDUCATION institutions co-operate with recruitment agents, Finnish higher education institutions have created a Code of Conduct to ensure that these agents follow shared principles of ethical recruitment. At the same time, un-affiliated or so-called wild agents continue to offer recruitment and relocation services to prospective students. They may promote the Nordics and their educational systems with false promises or overcharge applicants for services that are, in principle, free or low-cost. The review shows that the current Code of Conduct in itself is not sufficient.

- **HIGHER** education institutions Finland have taken steps to acknowledge and address risks and adverse impacts to applicants and students within their international student recruitment processes. However, **a full-fledged human rights due diligence process has not yet been implemented.**
- **UNIVERSITIES** in the UK and Australia have created comprehensive frameworks that address human rights risks in their operations and supply chains line with their national legislation on modern slavery. These frameworks include a human rights due diligence process and apply it to the higher education context. For international student recruitment, the frameworks address e.g., **monitoring of agents, procedures for misconduct and student remediation, as well as contract termination.**

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Recommendations to address the risk of exploitation and trafficking of students

1. Regulatory issues

- **NORDIC STATES MUST** strengthen their efforts to **prevent trafficking in persons and protect against human rights abuse** within their territory and/or jurisdiction by third parties, including business enterprises. This also applies to education institutions recruiting international students.
- **NORDIC STATES ARE** encouraged to **introduce legislation to regulate the activities of private employment or recruitment agencies** and of informal labour providers through the introduction of **a system of licensing or registration**.
- **NORDIC COUNTRIES SHOULD assess the use of blocked bank accounts to strengthen financial safeguards against exploitation of international students**. Following the examples of Germany and Norway, policymakers should explore the use of **blocked accounts** requiring students to deposit the required amount for living expenses for the duration of their studies. This ensures financial stability and reduces vulnerability to exploitation.

2. Review and regulation of the use of recruitment agents, including through developing comprehensive human rights due diligence frameworks

- **NORDIC EDUCATIONAL INSTITUTIONS** should **consider limiting or phasing out the use of education agents or other middlemen**, given the risks of misinformation, exploitation, and weak oversight.
- **NORDIC EDUCATIONAL INSTITUTIONS** should **develop a comprehensive human rights due diligence framework that addresses the risks of exploitation**. Such a framework should incorporate appropriate governance and management structures, a clear policy on a due diligence process to prevent and address exploitation, and integrate and embed due diligence processes into existing processes including risk management processes. It should address and remediate identified cases, measure performance, revise existing processes, and communicate on the actions taken. The framework should also incorporate engagement with rights-holders at crucial junctures.



- **IF AGENTS ARE** used, **Nordic educational institutions should require strict adherence to the Agent Code of Conduct or similar national code of conduct** and only collaborate with agencies that comply with them. Additionally, Nordic educational institutions should ensure that their agreements with agencies include specific contractual clauses regarding, e.g.:
 - **A BAN ON** the use of subcontractors,
 - **CLEAR DUE DILIGENCE** procedures in line with the contents of the Code of Conduct, and
 - **DETAILED REMEDY MECHANISMS** in case of breaches.
- **FINNISH HIGHER EDUCATION** institutions should **update and strengthen the Code of Conduct** and jointly **create strong contractual clauses** that define the shared responsibilities and roles of actors involved in student recruitment, define the rights for the educational institution to obtain information on agents' conduct, the roles and responsibilities in cases of misconduct, remediation to students, and termination clauses.
- **NORDIC HIGHER EDUCATION** institutions should **require agencies to use written contracts with students**. Agencies must provide students with a transparent written contract specifying services, fees, and responsibilities. These contracts should:
 - **ESTABLISH THE AGENT'S** liability to compensate the student, and
 - **INCLUDE LIABILITY FOR** damages suffered by the educational institution in cases of misconduct.

- **GOVERNMENT ACTORS SHOULD** fund **a survey study** where international students would be asked about their application and arrival process, including whether they used an agent, and if they did, how they perceived it and what kind of fees they paid and to whom. This information could be used to better understand why such agents are used, and strengthen **mitigation measures** against misconduct.



3. Provision of balanced and truthful information to prospective students

- **NORDIC HIGHER EDUCATION** institutions and state authorities should jointly ensure that marketing materials and admission communications to prospective students include:
 - **REALISTIC DESCRIPTIONS OF** the cost of living,
 - **ACCURATE INFORMATION ON** job market conditions, and
 - **CLEAR EXPLANATIONS OF** studying and living conditions in the country of destination.
- **THE ROLES AND RESPONSIBILITIES OF ACTORS** (embassies, migration authorities, etc.) should be clarified so that sufficient and accurate information is delivered to prospective student, also to avoid gaps or conflicting messages.

4. Access to services and strengthening pathways to decent work during studies

- **EDUCATIONAL INSTITUTIONS SHOULD strengthen their cooperation** with local municipalities and wellbeing service counties, NGOs, and public authorities, such as the immigration service to ensure that students and their families have access to low-threshold advice and guidance on their rights, possibilities and obligations and can access the services available for them. This includes ensuring that international students, their spouses and children receive adequate **support services and integration opportunities**, including:
 - **HOUSING ASSISTANCE,**
 - **CHILDCARE AND SCHOOL** placements,
 - **EMPLOYMENT AND INTEGRATION** services for spouses, and
 - **LANGUAGE TRAINING OPPORTUNITIES.**
- **EDUCATIONAL INSTITUTIONS SHOULD strengthen pathways to decent employment during and after the studies** by:
- **STRENGTHENING COOPERATION WITH** employers to ensure internships and opportunities for career development.
- **ENSURING THAT INTERNATIONAL** students have access to information on their rights and obligations in the Nordic labour markets as well as where to seek support if problems occur.



5. Strengthening human rights due diligence in educational export

- **EDUCATIONAL INSTITUTIONS SHOULD** ensure they have **adequate competence in international partnerships**. Institutions engaged in education export must have:
 - **STRONG KNOWLEDGE OF** local regulatory conditions,
 - **ABILITY TO ASSESS** partner reliability,
 - **SKILLS IN IDENTIFYING** corruption risks and other vulnerabilities, and
 - **DESIGNATED EXPERTS IN** educational export who ensure close contact with partners and monitor the cooperation
- **EDUCATION INSTITUTIONS AS WELL AS GOVERNMENTS SHOULD implement systematic risk assessments** before entering new markets or partnerships covering issues such as governance, financial stability, corruption levels, and human rights concerns.

6. Closer integration of governmental policies concerning education, employment, integration, migration, and crime prevention

- **A SUCCESSFUL RESPONSE** to the current problems international students face will require **coordinated action across a variety of policy fields**. These include:
 - **STRENGTHENED REGULATION AND** monitoring of international recruitment, including through enhanced international cooperation and coordination to address fraudulent recruitment practices, e.g. through the development of international regulation.
 - **STRENGTHENED COORDINATION BETWEEN education, employment, integration and migration policies** so that there is better alignment between demographic needs, employment opportunities, and access to integration and other services.
 - **STRENGTHENED UNDERSTANDING IN the broader Nordic context** of exploitation faced by international students as a part of the overall phenomenon of exploitation, work-related crime and human trafficking, and strengthening efforts to address situations of exploitation.



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