

**APPG for International Students**  
**Considerations for the inquiry into *A sustainable future for international students***

## **1. Background**

**The Association for the Education & Guardianship of International Students, AEGIS**, was founded as a charity in 1994 by a group of established guardianship organisations and UK boarding schools in response to the lack of regulations around the care of international students, aged 18 and under, studying in the UK.

AEGIS seeks to encourage international students to come to the UK by ensuring that they are well looked after, that their welfare is protected, and that their experience of life and study in the UK is therefore extremely positive.

The core work of AEGIS is the accreditation of guardianship organisations through a rigorous programme of inspections, led by experienced independent school inspectors. International students are considered a vulnerable group by UK safeguarding experts, and AEGIS seeks to protect and support them.

AEGIS recently partnered with the Boarding Schools' Association (BSA) to ensure a greater awareness of good practice in guardianship within schools. Our aim is to ensure that every international student is well looked after and protected.

## **2. Statistics**

There are currently 28,513 non-British students at ISC schools whose parents live overseas (ISC census 2018). The total number of international students aged 18 and under, studying in the UK will of course be higher. There are only around **4900** international students under AEGIS guardianship for the academic year 2017/18.

AEGIS has 44 accredited guardianship organisation members and 72 school members. As a charity, AEGIS is supported by annual membership fees.

No other organisation inspects guardianship organisations in the UK.

### **3. Aims of AEGIS**

Firstly, to ensure to the greatest extent possible that a guardianship organisation fully meets the standards and requirements of current safeguarding and child protection legislation and practice in respect of the care of international students in residence while studying in the UK; and

Secondly, to ensure that the highest standards of care, safety and supervision in respect of the pastoral, social, cultural and educational welfare and wellbeing of international students while studying in the UK are maintained by the guardianship organisation.

### **4. Objectives**

- To promote the highest possible standards of care to international students, in line with current safeguarding legislation, through a rigorous and thorough inspection and accreditation process;
- To provide a strict code of practice and protocols to which all of its members are expected to adhere, including duties of information between principal parties, accommodation, induction, safeguarding and child protection training, pastoral and educational support, emergency procedures, complaints and grievances;
- To offer support, guidance, preparation and relevant training, to those guardianship organisations seeking accreditation, through a consultancy service for inspection and accreditation;
- To operate a system of regular re-inspection every four years of all fully accredited members, thereby ensuring compliance with current statutory requirements and guidance, particularly those pertaining to international students aged 18 years and under;
- To make accessible to all of its members, via the AEGIS website, newsletter and AEGIS office, support, guidance and up-to-date information, as and when appropriate;
- To provide networking opportunities for school, guardianship organisations and agents through AEGIS conferences and workshops.

## 5. Challenges

- No legislation currently exists to require the inspection and accreditation of guardians and guardianship organisations. Unaccredited guardians and guardianship organisations fall under the radar and may not act in the best interests of the child. Failure to regulate guardianship is a child safeguarding disaster in the making.
- When a student, under the age of 16 (under 18, if disabled), is living in a homestay who is not their parent or a close relative for more than 28 days, the guardian and homestay must adhere to the regulations regarding private fostering in place within their local area. The guardianship organisation/person who has arranged the homestay is required to liaise with the school and the homestay to ensure that where possible the local authority are notified of the proposal for a private fostering arrangement at least 6 weeks before the date on which the arrangement is to begin or immediately where the arrangement is to begin within 6 weeks.  
If the stay is shorter than 28 days, there is no requirement for a homestay to be vetted by the local authority. AEGIS, however, requires all guardianship companies' homestay members, aged 16 and over, to have enhanced level DBS checks, with a barred list check for the main carer. AEGIS also, for example, requires a guardianship company to carry out a homestay visit, to assess the suitability of the family and accommodation, along with health and safety checks. This applies to international students of any age being placed in a homestay for any length of time.
- Because of a general lack of urgency and awareness of AEGIS accreditation, some schools are unaware of inappropriate guardianship arrangements in which students are placed until there is a crisis.
- Some schools arrange 'in-house' guardianship. These guardians are rarely inspected and are rarely accredited; best practice would be for an international student to have an independent, accredited guardian.
- Some schools view guardianship as a headache. AEGIS provides the solution – fully vetted and accredited guardians, providing fully inspected services in line with current child safeguarding legislation. AEGIS also provides free support and advice to schools.

## **6. Solutions**

AEGIS offers a robust, well-established accreditation and inspection process, and is keen to work with the DfE, British Council, BSA, UKVI and schools/colleges to roll this out to the whole sector as a requirement for educational guardians and guardianship organisations over the next 2-4 years.

Some local authorities are already struggling with current workload and private fostering responsibilities. AEGIS' role would ensure that no additional pressure would be placed on local authorities. AEGIS already has great expertise in the hosting of international students.

If more stringent checks on guardians are too cumbersome for schools, ensuring that the guardian is AEGIS accredited would be the simplest solution. By directing parents to the AEGIS website, schools could help eliminate the risk of inappropriate guardians being appointed.

The need for an international student's educational guardian, if not a close family member or reliable friend, to be an accredited guardian could, for example, be incorporated into requirements for schools/colleges through DfE and/or UKVI.

Together, these solutions will help ensure that international students are well looked after, that their welfare is safeguarded, and that their experience of life and study in the UK is extremely positive.

## 7. Evidence

### **Lack of reporting of private fostering arrangements by both schools/colleges and educational guardians**

- A local authority contacted AEGIS recently with concerns over unaccredited guardians moving students between homestay families every 27 days to avoid the 'private fostering' checks that are required for stays of 28 consecutive days and longer.
- Not all educational guardians and schools/colleges report long-term stays. This is an email from another local authority:

*"Thank you for taking the time to discuss Private Fostering and the issues AEGIS and the local authorities have around Guardianship agencies notifying their local authority about children (under 16 or 18 if they are disabled) staying with host families for more than 28 days.*

*We agreed that some guardianship agencies are very professional carrying out DBS checks, send referrals to the local authority and work closely with the private fostering service, others are not, which may put children at risk."*

- Another local authority contacted AEGIS regarding a small number of European day students, who were placed with inappropriate homestay families, arranged by a Study – Travel agency. The students had an unaccredited 'educational guardian' who lived in another county and whom the students never met. The college in question did not report the 'private fostering' arrangements to the local authority so no checks were made. One of the homestays was on the local authority register, one family had no heating or electricity after a certain time in the afternoon, one family had a terminally ill member based in the living room, one family owned a vicious dog. The students' parents had paid large sums of money to send their children to the UK and were promised 'like for like' accommodation. The children, knowing that their parents had invested so much in their education, felt they should endure the conditions and thought it was just what the UK was like. They finally opened up to a member of staff at the college towards the end of the first term. The local authority became involved and the children were regarded at risk in the homestays which had been provided. The students requested to return to their home countries immediately.

*The AEGIS Minimum Standards followed by AEGIS accredited guardians states:*

*"Where a guardianship organisation has any day pupils under the age of 16 (under 18, if disabled) living with homestays who are not their parent or a close relative for more than 28 days, they must adhere to the regulations regarding private fostering in place within their local area as directed by their local authority."*

### **International students being placed in inappropriate, unsupervised accommodation during school holidays and exeats**

- In the run up to a half-term, Airbnb accommodation had been arranged for a student, under the age of 16, by their unaccredited guardian. The arrangement was brought to the attention of the school not by the guardian, but by the Airbnb host who had received all the student's personal details. Luckily the Airbnb host (a former teacher who understood the safeguarding implications) contacted the school, AEGIS and police. Alternative arrangements were made by the guardian, however, the school will continue to allow students to use that particular guardian as they have known them for some time. The school was dismissive of AEGIS and the Airbnb host who flagged the issue.

*"I am an Airbnb host and I recently had a request through the website to host a 15 year old Chinese girl for 11 nights. The girl was said to be a boarder at a school in XXXXX.*

*I was immediately concerned as such a request has many worrying elements so I contacted the school mentioned, the police and Airbnb.*

*The Airbnb site made it clear that the person, a guardian, requesting accommodation, meals and for me to take out the child 'a bit' had placed another girl in a strangers house over the New Year period.*

*I believe your organisation should know what is happening to children during school holidays as it is potentially very dangerous and it is something you may wish to bear in mind during your inspection and quality visits and training." – taken from the email to AEGIS.*

- We often hear of schools allowing students under the age of 16 to stay in B&B accommodation, unsupervised, even if the guardian does not approve of the arrangement. This puts the educational guardian in a difficult position. This is a response from a Head of Boarding to an AEGIS accredited guardian who raised serious concerns over the school allowing the B&B arrangement of a 14 year old international student, for an exeat weekend:

*"...it is not uncommon for students to stay locally at B&Bs but obviously their behaviour and conduct whilst there is the responsibility of the guardian/parent and the B&B reserves the right to remove any guest deemed unsuitable. Whilst I would always encourage students to go to their guardians I understand this is sometimes difficult and accept that this is a solution. I am sure XXXXX will be fine at the B&B."*

*AEGIS accredited guardians provide vetted homestay accommodation for international students during short and long holidays.*

## 8. Endorsements

**“Safeguarding Associates for Excellence (SAFE) believe AEGIS play a crucial role in safeguarding international students, inspecting professional educational guardianship companies to a high standard and in doing so ensuring that the safety and wellbeing of students in the care of guardianship companies are put first.”**

Fiona Lee, former Detective, Devon and Cornwall Constabulary, Safeguarding Associates for Excellent (SAFE)

**“The safeguarding of international students, using vetted guardians, is vital not only for students and their families, but also for the reputation of British education. AEGIS’ accreditation and advice, and the passion of the team in such an important sphere deserves support that StudyTravel is happy to give.”**

Nicola Lutz, Director, StudyTravel

**"Safeguarding every child is paramount. In the UK we have around 27,000 international students attending British independent schools who are dependent on care from trusted people. Currently there is no legislation that requires these adults in their care to be regulated. We have heard some shocking stories involving breaches in their safety and we need firm action to tighten the regulations."**

Ann Marie Christian, Safeguarding Expert, Child 1st Consultancy

### ***Note regarding fees***

*AEGIS operates on a low cost basis. Guardianship organisation members are charged an annual membership fee of £250 plus a small fee per student (currently £4.70 per student). Schools are invited to support AEGIS with an annual school membership fee of £215 or £325, depending on size.*

### ***Inspection fees for guardianship organisations:***

***Registration fee: £300*** Provides the organisation with the AEGIS Inspection Handbook and Minimum Standards, helping to share best practice.

***Stage One Inspection: £850*** To include inspection of documents and policies and one on-site visit by the lead inspector.

***Stage Two Inspection: £1500 15 students or fewer, £1850 16 students or more.*** Comprises a full inspection by lead and supporting inspectors, to include visits to selected schools and homestays. The guardianship organisation will then receive a written report and recommendations where necessary.

***Re-inspection: £2500*** A condition of continued membership of AEGIS is that every accredited guardianship organisation be re-inspected every four years.

*We anticipate scaling up our work and in doing so, it will benefit from economies of scale. As a registered charity, AEGIS is committed to providing the best possible service to its members at affordable rates.*