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West African Elites' Spending on UK Schools and Universities: A Closer Look

Matthew T. Page

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Abbreviations

AML	anti–money laundering
CCB	Code of Conduct Bureau (Nigeria)
DIT	Department for International Trade (UK)
EFCC	Economic and Financial Crimes Commission (Nigeria)
FSB	Federal Scholarship Board (Nigeria)
GDP	gross domestic product
GETFund	Ghana Educational Trust Fund
HMC	Headmasters and Headmistresses’ Conference (UK)
ISBA	Independent Schools’ Bursars Association (UK)
KYC	Know Your Customer
N	naira
NCA	National Crime Agency (UK)
NDDC	Niger Delta Development Commission
OPBAS	Office for Professional Body Anti-Money Laundering Supervision (UK)
PEP	politically exposed person
PTDF	Petroleum Technology Development Fund (Nigeria)
SAR	suspicious activity report
UK	United Kingdom
UKVI	UK Visas and Immigration

Summary

Political, business, and cultural elites from around the world have a strong affinity for the United Kingdom (UK) education system. Nowhere is this truer than in West Africa, where some families in Nigeria and Ghana have a long tradition of sending their children to private boarding schools and universities in the UK. These institutions are especially popular destinations for the offspring of prominent politically exposed persons (PEPs) from the region. Immigration officials, admissions staff, and UK law enforcement are not likely to scrutinize the conditions under which the children of PEPs enroll in British schools, even though the PEPs themselves may have modest legitimate earnings and opaque asset profiles that in other circumstances would raise serious financial concerns. This relative lack of review has allowed some West African PEPs to channel unexplained wealth into the UK education sector.

It is not easy to estimate the overall value of this flow, yet it likely exceeds £30 million annually.¹ Most of these funds emanate from Nigeria and, to a lesser extent, Ghana; compared with these two countries, only a handful of students from elsewhere in West Africa seek an education in British schools. Tackling this small but significant illicit financial flow should be a priority for UK policymakers. In doing so, they would be helping to realize the UK's global anticorruption objectives, advance its International Education Strategy, and close a troublesome anti-money laundering (AML) loophole. Failing to do so would exacerbate existing corruption challenges both at home and abroad and increase the UK education sector's reputational liabilities.

Key Findings

- Scores of West African PEPs' children attend—or have recently graduated from—UK private boarding schools and universities. These include some that had been convicted of corruption-related crimes or had their assets seized by British courts. Among Nigerian political elites in particular, demand for places at UK private boarding schools and universities will remain high, exacerbating corruption risks to the country's education sector.
- The overwhelming majority of West African students in the United Kingdom pose little or no corruption risk; their families do not possess unexplained wealth and they are not linked to PEPs. However, many West African PEPs appear to be using unexplained wealth to pay for UK school and university fees. Stagnating salaries, rapidly increasing tuition and living costs, and declining currency values have made it increasingly difficult for some senior government officials to legitimately afford the cost of a UK education. Financial flows involving students linked to these officials may require closer scrutiny.

- British schools and universities' increasing awareness of money laundering risks is necessary—but not sufficient—to forestall illicit financial flows through the UK education sector. Many institutions still appear reluctant to acknowledge outside criticism of the sector's anticorruption shortcomings or learn from recent scandals. Some have strengthened their anticorruption protocols, but many are still reluctant to report suspicious transactions.
- The British government policies and programs created to boost the country's international education sector lack a much-needed anticorruption component. Including modest anticorruption safeguards into the UK's International Education Strategy would help government and education sector stakeholders to better tailor their marketing approaches to high-risk jurisdictions like Nigeria. Over the long term, these safeguards would reduce the sector's vulnerability to illicit financial flows.
- Educational institutions in Canada, the United States, and other countries that recruit elite students from West Africa are exposing themselves to the same corruption risks as their British counterparts. Although the UK education sector continues to attract West African PEPs, illicit financial flows from the region to boarding schools and universities in other Anglophone countries likely will increase over the coming decade, posing new anticorruption challenges for their policymakers.

Policy Implications and Recommendations

- The UK education sector's vulnerability to illicit financial flows generated by PEPs—both in West Africa and beyond—merits greater attention from policymakers, school and university leaders, education service providers, and law enforcement. Any effort by British policymakers to expand international education exports needs to be reconciled with other national strategic objectives, like combating global illicit financial flows. Otherwise, the recruitment of more wealthy students from corruption-prone, highly impoverished countries like Nigeria could handicap these countries' socioeconomic development by enabling capital flight, amplifying foreign exchange and currency pressures, and reinforcing domestic educational disparities.
- Any corrective policy changes must address these challenges holistically and should not be unreasonably burdensome to education sector stakeholders or international students. They should be structured to advance the United Kingdom's strategic anticorruption interests by reducing illicit financial flows into the education sector without diminishing its international education export capacity. To do so, UK policymakers should take steps to clarify the education sector's AML responsibilities, strengthen the anticorruption capacity of immigration officials and other gatekeepers, and provide anticorruption training and advice to key education sector stakeholders.

- For their part, the United Kingdom's independent schools, universities, and their intermediaries also have an important role and a clear interest in protecting the education sector from illicit financial flows. To start, they should strengthen internal policies and procedures designed to identify and respond to potential corruption risks. At the same time, education sector professional bodies should embrace calls for reform rather than reflexively bristle at constructive criticism from government, the media, or anticorruption advocates.

Introduction

A high-quality education in the United Kingdom is an expensive purchase desired by many but unaffordable for most. For numerous West African elites, it is also a family tradition and a sought-after means of reinforcing their family's preeminent social, political, and economic status from one generation to the next. For the region's top business elites, the cost of private boarding school—now upward of £35,000 per year—is easily affordable given their world-class earnings. It is less clear, however, how West African political elites—or politically exposed persons (PEPs)—can afford to send their children to schools or universities in the United Kingdom given their far more modest salaries. Yet many continue to do so, no questions asked.²

The gap between what West African PEPs pay for a UK education and what they can legitimately afford is a significant red flag. It suggests that the tuition fee payments they make to UK institutions may include proceeds of crime and thus constitute an illicit financial flow. Another concerning indicator is reports of recent instances in which UK educational institutions admitted the children of West African PEPs convicted of corruption or subject to corruption-related asset seizures. It is not easy to estimate the overall value of this flow, but it likely exceeds £30 million annually. Most of these funds emanate from Nigeria and Ghana; few students from other West African countries study in the United Kingdom.

This paper assesses the character, causes, and consequences of illicit financial flows into the UK education sector via West African PEPs. It first examines the scope and scale of international student recruitment from West Africa and then focuses on the small but significant minority of PEP-linked students who may pose a corruption risk to the sector. It then looks at the reasons why West African PEPs are especially attracted to British schools and universities, evaluates the adequacy of current anticorruption safeguards protecting the sector, and finally recommends ways to strengthen them.

Putting a Regional Problem Into Global Context

Recent media reports have illustrated the degree to which the UK education sector is vulnerable to corruption from illicit international financial flows. A 2019 article, for example, outlined how in one banking scandal known as the Troika Laundromat, a now defunct Lithuanian bank served as a conduit for hundreds of suspicious payments worth £4.2 million by anonymous shell companies to UK educational institutions, including the prestigious Charterhouse School.³ A 2014 report likewise revealed Moldovan police claims that companies linked to an alleged £14 billion money laundering scheme transferred funds to bank accounts belonging to a top UK private school.⁴ Transparency International's 2019 report "At Your Service" shed light on the UK education sector's corruption vulnerabilities through its analysis of how some UK professionals—including banks, law firms, and

company service providers—help corrupt individuals and regimes launder their money and reputations.⁵ Out of the 400 major corruption schemes analyzed in the report, 177 involved significant expenditures for schools and universities.⁶ The report also noted that because these institutions are not subject to the same anti-money laundering (AML) rules as other professional organizations in the United Kingdom, they are especially vulnerable to kleptocrats and criminals seeking to spend unexplained wealth.⁷

For its part, UK law enforcement has criticized the education sector's failure to proactively identify and report suspicious financial transactions. In 2018, then-minister for security and economic crime Ben Wallace warned that private schools in particular were being used to launder dirty money, warning that UK authorities would “come down on” schools “who don't ask many questions if suspicious people come along with cash.”⁸ The National Crime Agency (NCA), the United Kingdom's lead law enforcement agency focusing on organized crime, similarly noted that “if the salary of a parent is so low [that] they could not possibly afford the fees legitimately, this should also set alarm bells ringing.”⁹

The UK education sector's reaction to these comments has been mixed. Some groups have heeded calls for reform, but others have bristled at such outside criticism. Two professional bodies—the Independent Schools Council and the Independent Schools' Bursars Association—encouraged their member schools to tighten AML safeguards and file suspicious activity reports (SARs) as appropriate.¹⁰ However, another body—the Headmasters and Headmistresses' Conference (HMC)—pushed back on government concerns, stating that “there is no evidence we are aware of that any school has ever knowingly taken illicit payments and it is entirely wrong for anyone to suggest so,” that “schools exist to educate children and we are not experts in detecting signs of international crime,” and that “every school now has an updated procedure to help them check the provenance of funds.”¹¹ Such uneven responses indicate the UK education sector's internal tensions over its connections with potentially illegal financial flows.

Despite these assertions and promised reforms, UK educational institutions still rarely flag suspicious transactions. Out of roughly 480,000 SARs submitted to the NCA in the 2018/2019 fiscal year, UK schools and universities submitted just twenty-four—a miniscule number and fewer than the previous year. Likewise, examples of clear AML failures are not far from the headlines. In July 2020, for example, the NCA seized over £1 million from one such individual: a convicted Nigerian fraudster living in the United Kingdom. In addition to living a lavish lifestyle well beyond his legitimate income, his three children attended private schools with annual fees of £37,000 per child.¹² This apparent gap between promised reforms and real-world outcomes suggests that the UK education sector could do more to protect itself from illicit cash flowing into it from West Africa and beyond.

Methodology Note

This paper examines a complex and contentious issue. Given the privacy and reputational concerns, all individual or institutional identities have been anonymized, except in cases where those identities already have been widely reported in the media. Apart from interviews, this paper cites only publicly available, nonprivileged information. It is informed by thirty-one semistructured interviews conducted by the author and a Nigeria-based researcher with recent West African alumni of UK independent schools and universities, as well as UK and Nigeria-based international education experts. The author and researcher ensured a gender balance among interviewees. The paper also draws on insights gleaned from Dr. Pere Ayling's interviews (conducted between 2012 and 2014) with twenty Nigerian elite parents whose children attended UK boarding schools.¹³

This paper also incorporates material from West African journalists who cover political corruption issues. However, these journalists viewed this topic as especially sensitive and therefore were reticent to speak about it candidly. This reticence reflects the journalists' concerns that revealing embarrassing information about senior officials might jeopardize their career prospects or personal safety.

West African Elites' in UK Schools and Universities: Scope, Scale, and Trends

West African students are a modest but growing share of the British international education market—a sector that UK policymakers hope to expand post-Brexit. As of 2016, the export value of UK universities was £13.4 billion.¹⁴ Independent primary and secondary schools collectively brought in £930 million from overseas students—a 48 percent increase over 2010. The UK government's 2019 International Education Strategy aims to increase that contribution further by increasing international student numbers by 30 percent and upping the sector's value to £35 billion by 2030.¹⁵

The strategy specifically mentions Nigeria as a UK education market opportunity, noting that “the demand for skills across Africa is significant and we must ensure that UK providers are in the best position to play a competitive role in meeting that demand.”¹⁶ Neighboring Ghana is also widely seen as a secondary market with strong growth potential. Yet the flow of students from both countries—which greatly exceed the combined total from the rest of West Africa—can vary significantly year-to-year depending on macroeconomic trends, monetary policies, the ease and speed of visa application processes, and the availability of post-study residency permits.

Nigeria: A Complex and Dynamic International Education Market

Nigeria’s international education market defies simple characterization. It is, according to one expert, “a market of extremes, it is either very tough, or buoyant.”¹⁷ In recent years, Nigerian elites’ high demand for a UK education has been dampened by a prolonged economic downturn, domestic political changes, growing obstacles to making school fee payments, and worsening exchange rates.¹⁸ Overall, Nigerian students’ enrollment in UK schools and universities closely correlates with the country’s gross domestic product (GDP) growth.

The impact of Nigeria’s 2014–2016 recession on many elite families, compounded by government restrictions on the amount of foreign exchange made available to the public, led to a sharp decline in Nigerian students attending UK schools and universities (see table 1).¹⁹ Unable to freely convert their naira savings into pounds, many Nigerian parents struggled to pay their children’s UK school fees in full and on time.²⁰ Faced with payments deadlines, some families were forced to buy pounds on the black market at a 40 percent premium.²¹ Some very wealthy families—including those who held dollar- or sterling-denominated assets in overseas bank accounts or enjoyed privileged access to discounted foreign exchange via bureaux de change operated by friends or family members—were less impacted by these restrictions.

TABLE 1
UK Student Visas Issued to Nigerians by Year (Annual Change)

2010	2011	2012	2013	2014	2015	2016	2017
12,256 (+0.2%)	12,103 (-1.2%)	11,122 (-8.1%)	12,010 (+8.0%)	10,488 (-12.7%)	9,524 (-9.2%)	6,475 (-32.0%)	6,082 (-6.1%)

SOURCE: UK Home Office, Entry Clearance Visas Tables, Volume 2, accessed October 1, 2020, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/709287/entry-visas2-mar-2018-tables.ods.

As Nigeria emerged from recession in early 2017, its central bank relaxed its controls on sales of foreign exchange, making it easier and more affordable for parents of children schooling abroad to pay tuition fees.²² As economic conditions eased, the market steadily improved until early 2020, when the global coronavirus pandemic disrupted several steps in the admissions process. Nevertheless, a combination of fee increases and worsening exchange rates meant that for many Nigerian families, the cost of attending a private boarding school in the United Kingdom had effectively doubled between 2015 and 2020. As Nigeria’s economic growth is expected to plateau over the next

five years, owing to issues such as long-standing economic mismanagement, high unemployment, and stagnating global demand for crude oil, it is likely that a UK education will fall further out of reach for most middle-class Nigerians. At that point, only the country’s super-wealthy business and political elites will be able to afford it.

Independent schools

British independent schools—especially private boarding schools—view Nigeria as an increasingly attractive market. Most UK independent schools warmly welcome Nigerian students, according to market experts. They overwhelmingly see these students as better-than-average performers and “net contributors.”²³ The number of Nigerian students at UK independent schools peaked in 2015 and then decreased somewhat in response to worsening economic conditions in Nigeria (see table 2). It is, however, difficult to precisely estimate the number of Nigerian students at UK schools and universities. Many of these students—perhaps as many as 50 percent—are dual nationals, meaning that they are counted as domestic (UK) students in schools’ census returns, and so these figures likely do not reflect an accurate assessment.²⁴

TABLE 2
Nigerian Students at UK Independent Schools

Year	2014	2015	2016	2017	2018	2019	2020
Total	1,328	1,624	1,592	1,490	1,368	1,411	1,429
% of Total Non-UK Students	3.72%	3.69%	3.36%	2.95%	2.55%	2.55%	2.44%

SOURCE: Data published in the Independent School Council’s Annual Census, 2014–2020, accessed October 2, 2020, <https://www.isc.co.uk/research/annual-census/>.

Despite being “one of the most complicated, sensitive and potentially difficult [boarding recruitment markets] in the world,” Nigeria is also a lucrative one for overseas schools willing to invest time and attention in cultivating relationships with top Nigerian private “feeder schools.”²⁵ Some UK institutions have developed partnerships with such schools, leading to mutually beneficial curricular, staff, and sport exchanges.²⁶ Many of Nigeria’s premier private schools are located in Lagos, one of the world’s megacities and the country’s commercial capital. In recent years, however, the number of private schools in the capital city of Abuja has grown rapidly, and many of these schools cater to the children of Nigeria’s wealthy political elites.²⁷

Although independent schools in the United Kingdom continue to be popular with Nigeria’s elite families, others have turned to Canadian boarding schools as a viable alternative. According to one local agent, Nigerian families are attracted to Canadian schools because they are less expensive, send

more pupils to U.S. Ivy League universities and the UK’s Oxford and Cambridge universities, and have more impressive facilities and extracurricular activities than their UK counterparts.²⁸ Canadian officials have also been more effective than their British counterparts at partnering with its education sector stakeholders to develop a more sophisticated regional-based marketing strategy keyed to helpful visa and immigration policy changes, according to one international education expert.²⁹ Consequently, UK independent schools have had to be competitive in their partnership and recruitment efforts in Nigeria and cannot rest on their reputations alone to attract potential pupils.

The disruptive effects of the global coronavirus pandemic on travel, education, and immigration also are likely to influence the Nigerian boarding school market in new and unpredictable ways, especially as high-end local providers scramble to meet pent-up domestic demand for sixth form/A-level programs (equivalent to the last two years of U.S. high school). Before the pandemic, most elite Nigerian private schools had not had such programs because their students normally transitioned directly to UK boarding schools or sixth-form colleges.³⁰ Now, as Nigeria’s top private schools create high-quality sixth-form programs to meet this demand, it is likely that fewer Nigerian families—especially those belonging to the country’s rising middle class—will elect to send their children to UK boarding schools.³¹ A growing number of partnerships between top Nigerian private secondary schools and UK universities will compound this trend.³² Parents who feel more confident that their Nigerian-educated children will be competitive applicants to British universities may not consider it necessary to finance an expensive boarding school education in the United Kingdom first.

Universities

The Nigerian market is equally complex for UK universities, who also face increasing global competition for international applicants. Although the overall number of Nigerian students attending UK universities has decreased over the past several years (see table 3), Nigeria still ranks sixth in terms of non-EU enrollments, just behind Malaysia, Hong Kong, the United States, India, and China.³³ Traditionally, UK universities have prioritized recruiting postgraduate students from Nigeria, many of whom tap into Nigerian government-sponsored scholarship programs to complete a master’s degree or even start doctoral studies in the United Kingdom.³⁴

TABLE 3
Nigerian Students Enrolled at UK Universities by Academic Year

2013/14	2014/15	2015/16	2016/17	2017/18
18,020	17,920	16,100	12,665	10,540

SOURCE: UK Higher Education Statistics Agency, “Top Ten Non-European Union Countries of Domicile in 2017/18 for HE [Higher Education] Student Enrolments by Country of HE Provider and First Year Marker,” accessed October 7, 2020, <https://www.hesa.ac.uk/data-and-analysis/sb252/figure-11>.

The decline in Nigerian enrollments cannot be attributed to any one factor. Nigeria's recent recession, decline in Nigerian government scholarships, naira devaluation, increase in global market competition, repeated changes to UK visa and residency rules, and sharpening of antimigrant rhetoric in the UK have all had an impact on university applications.³⁵ The decrease may also be a sign that UK universities are no longer affordable for most middle-class Nigerian families. If so, the overall number of students wealthy Nigerian elite families could be holding steady—or even modestly increasing.

Broadly speaking, UK universities see Nigerian students—and indeed international students generally—as a revenue center. They typically pay more than three times the fees paid by students from the United Kingdom or from European Union countries. Some UK universities also offer discounts of 20 to 30 percent if students can afford to pay their fees in advance.³⁶ But unlike their U.S. and Canadian competitors, very few UK universities offer scholarships or discounts to Nigerian students.³⁷ Those that do—most notably Coventry University—typically attract more Nigerian applicants by combining their scholarships with effective marketing, tailored course offerings, and competitive fees.³⁸ Table 4 shows which UK universities attract the most Nigerian students and which are recruiting more or fewer than they were four years ago.

Currently, the university recruitment market is more complex. UK institutions seek to recruit postgraduates along with traditional undergraduates and more recently with “pathway” students. Pathway programs—many of which are managed by for-profit companies like Kaplan, INTO, or Navitas—are expensive preparatory courses intended to prepare international students who may academically qualify for direct admission for delayed entry into UK universities.³⁹ An increasing number of universities have been outsourcing their international recruitment to such pathway companies, which guarantee their institutional partners a certain quota of well-trained students each year.⁴⁰ Such advanced entry programs—which can increase the cost of an undergraduate degree to over £80,000—have become a “big business,” according to one expert.⁴¹ Many Nigerian students have also attended university foundation courses in the United Kingdom or at top-tier private secondary schools in Nigeria. Unlike the pathway programs, these preparatory courses do not guarantee a university place to their graduates.⁴²

TABLE 4

Top 15 UK University Destinations for Nigerian Students

Institution	2018/19 Nigerian Students (%Δ vs 2014/15)	% of Institutions' Total International Students
Coventry University	555 (↓ 49%)	4.63%
University of Hertfordshire	365 (↓ 34%)	8.02%
Robert Gordon University	340 (↓ 41%)	16.79%
University of Salford	270 (↓ 48%)	14.96%
Nottingham Trent University	225 (↓ 21%)	4.71%
University of Birmingham	215 (↓ 36%)	2.36%
Anglia Ruskin University	210 (↓ 36%)	5.93%
University of the West of England	210 (↓ 4%)	5.32%
University of Portsmouth	205 (↓ 40%)	4.58%
University of Northumbria	200 (↑ 54%)	4.88%
University of Aberdeen	195 (↓ 7%)	3.72%
University of Nottingham	190 (↓ 19%)	2.32%
De Montfort University	175 (↑ 25%)	3.31%
University of Leeds	175 (↓ 41%)	1.89%
University of Manchester	165 (↓ 47%)	1.14%

SOURCE: UK Higher Education Statistics Agency, "Table 28—Non-UK HE Students by HE Provider and Country of Domicile: Academic Years 2014/15 to 2018/19," accessed October 7, 2020, <https://www.hesa.ac.uk/data-and-analysis/students/table-28>.

As with its boarding schools, Canada's universities are gaining market share in Nigeria. Many Nigerian families are attracted to their more affordable tuition fees as well as the country's less onerous visa process and clearer pathways to postgraduate work and residency.⁴³ In 2020, the Canadian government sought to make the country even more competitive by introducing the Nigeria Student Express scheme, aimed at improving student visa processing times and introducing a specialized system for verifying the financial status of prospective applicants.⁴⁴ Nigerian applicants also see Canada as a safer environment for people of color—one that is less xenophobic than the United States and the United Kingdom and thus a more attractive destination.⁴⁵ For these reasons, the number of Nigerian students attending Canadian institutions increased from 2,825 in 2009 to 11,985 in 2019.⁴⁶

Other Anglophone countries also compete against the United Kingdom for Nigerian university students. In 2018, roughly 13,400 Nigerians attended U.S. universities—the highest amount since the mid-1980s—contributing an estimated \$514 million to the U.S. economy.⁴⁷ Likewise, Ireland and Australia are issuing more student visas to Nigerians each year.⁴⁸ Looking closer to home, a growing number of Nigerian elites—especially those who can no longer afford British institutions’ disproportionately high tuition fees—are sending their children to private universities in Nigeria or less-expensive Ghanaian universities.⁴⁹

Nigerian Government Scholarship Bodies: Enablers or Embezzlers?

The Nigerian government operates numerous university scholarship programs aimed primarily at postgraduates seeking to study in the United Kingdom and elsewhere internationally. However, these government entities—which include the Petroleum Technology Development Fund (PTDF), Niger Delta Development Commission (NDDC), Federal Scholarship Board (FSB), Tertiary Education Trust Fund, and numerous state government scholarship boards—are all highly vulnerable to corruption, making them precarious partners for the UK education sector.

The PTDF, which partners with eighteen British universities, has a particularly significant UK footprint.⁵⁰ It sends dozens of postgraduate students to study in its chosen institutions each year. According to a recent government audit, however, the PTDF spends far more on itself than on the scholarships it provides. Between 2012 and 2016—the period covered by the audit—the PTDF disbursed N29.6 billion (£61 million) in scholarships while spending N45.3 billion (£93.4 million) on its own staffing, administrative, training, and travel costs.⁵¹ The audit also cast doubt on the value of the scholarship program, noting that “of the numerous numbers of scholars funded by the [PTDF] . . . it is difficult to ascertain the proportion of successful scholars who returned after their study programmes and integrated into the Nigeria oil and gas industry.”⁵²

Overseen by political appointees and lacking in transparency, these bodies have been dogged by numerous corruption and mismanagement scandals. Since 2018, many students studying abroad on PTDF and NDDC scholarships have been left stranded overseas after their scholarships went unpaid.⁵³ In 2018, a Nigerian senate committee accused the FSB of large-scale fraud and threatened to investigate it.⁵⁴ A subsequent media inquiry revealed that the FSB was awarding scholarships to ineligible recipients, including some who were overage or underage or who did not take the mandatory exams.⁵⁵

Out of all of Nigeria's national scholarship bodies, however, the NDDC is especially corruption prone. In April 2020, a Nigerian Senate investigation revealed that the NDDC disbursed a total of N85.6 million (£176,500, or £12,600 each) to fourteen top NDDC officials so they could attend the UK degree-granting ceremonies of several of the commissions' scholarship recipients.⁵⁶ The NDDC made this disbursement—which as of July 2020 had yet to be repaid—even though both Nigeria and the United Kingdom were in lockdown and there were no commercial flights between the two countries. The Senate probe also revealed that many of the same officials had paid scholarships to themselves at a time when the NDDC had cut off payments to legitimate scholarship recipients already studying abroad.⁵⁷

Nigeria's state scholarship bodies likewise are vulnerable to malfeasance and graft. In July 2020, Nigeria's Economic and Financial Crimes Commission (EFCC) arraigned the former head of the Lagos State Scholarship Board over an alleged N127 million (£262,000) fraud.⁵⁸ The EFCC also arraigned ex-officials of the Kwara State Scholarship Board in January 2020, charging them with allegedly embezzling N50 million (£103,000) in scholarship funds.⁵⁹

Looking beyond these headline-grabbing scandals, Nigeria's scholarship bodies have also become more politicized and less objective since 2015, according to experts interviewed for this paper. According to one interviewee, "Scholarship bodies were following the rules" back in 2015, but "things have changed" and "the process has been tampered with . . . even if, on paper, it looks as though it is merit-based."⁶⁰ This shift suggests that the Nigerian government is awarding an increasing proportion of its scholarships based on applicants' political and personal ties rather than their academic prowess.⁶¹ At the same time, Nigerian government scholarship bodies also are becoming more commercialized, forging cozy relationships with service providers and universities which (along with Western governments) actively lobby for their business. Such lobbying could verge on corruption if the relationship were to involve inappropriate gifts, excessive hospitality, or other kickbacks to Nigerian government officials.⁶² Looking ahead, UK universities may be exposed to greater reputational risks—and even scrutiny from domestic and international law enforcement—in connection with their financial dealings with Nigerian government scholarship funds or Ghana's scandal-prone equivalent.

Ghana: A Bonus Market of Bargain-Hunting Elites

British independent schools and universities see Ghana as a “bonus market” with significant growth potential.⁶³ They are seeking to tap into Ghana’s growing elite networks, attracting students from families that have prospered from the country’s newfound petroleum wealth and recent rapid economic growth. In a recent prediction (albeit now overshadowed by the coronavirus pandemic), the International Monetary Fund estimated that Ghana’s economy would grow by 8.8 percent, making it the world’s fastest-growing economy in 2019.⁶⁴ The growth in the number of Ghanaian students attending UK boarding schools have exceeded that pace, increasing 23 percent from 2018 to 2019.⁶⁵ Nevertheless, the overall number of visas issued to Ghanaians wishing to study in the United Kingdom has remained relatively steady over the past decade (see table 5).

TABLE 5
UK Student Visas Issued to Ghanaians, 2010–2017

2010	2011	2012	2013	2014	2015	2016	2017
965	1,075 ↓	1,133 ↑	1,087 ↓	836 ↓	881 ↑	961 ↑	877 ↓

SOURCE: UK Home Office, Entry Clearance Visas Tables, Volume 2, accessed October 1, 2020, https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/709287/entry-visas2-mar-2018-tables.ods.

Ghana’s international education market also has been buoyed by Ghanaian elites’ academic pedigrees. For many, sending their children to schools and universities in the United Kingdom is a family tradition. Ghana’s current president, Nana Akufo-Addo, for example, attended Lancing College—an independent school in West Sussex—and briefly attended Oxford University. Several elite private secondary schools in and around Ghana’s capital city of Accra, such as SOS-Hermann Gmeiner International College and Ghana International School, also attract children of wealthy industrialists and senior politicians.⁶⁶

Nevertheless, in contrast to Nigerian elites, Ghana’s wealthiest families demonstrate a somewhat weaker preference for UK schools and universities. Many elites send their children to the United States or Canada for higher education, often to take advantage of scholarships that their universities offer. British universities, in contrast, have rarely provided financial assistance to international stu-

dents. The Ghana Educational Trust Fund (GETFund) also provides government scholarships for Ghanaian students undertaking university studies abroad, though recently the program has been dogged by scandal.⁶⁷ In February 2020, Ghana’s auditor-general found that GETFund scholarships were improperly awarded to dozens of adult PEPs and their associates for graduate-level study.⁶⁸

Because of Ghanaian elites’ bargain-seeker mentality, UK schools and universities face greater international competition for the country’s globally mobile students. According to one expert, “There is a cultural difference between Nigerian elites who see spending money as a status symbol and Ghanaian elites, who are more understated. Historically, they have wanted to play down their wealth . . . and fly under the radar. [In Ghana], even multimillionaires are looking for scholarships.”⁶⁹ Such cost considerations and a newly streamlined visa process appear to be driving Ghanaian students’ growing interest in Canadian schools. Ghanaian students attending Canadian institutions jumped from 545 in 2009 to 2,070 in 2019.⁷⁰ U.S. universities also see Ghana as a stable regional platform from which they can recruit regionally. At least two U.S. institutions—the private Webster University and the public Morgan State University—have established satellite campuses in Ghana. As these and other Western universities expand and develop their footprint and academic offerings in Ghana, they have become market disruptors that gradually dampen regional demand for costlier overseas institutions.

Comparative Case Study: Libyan Elites and UK Schools

Like Nigeria and Ghana, Libya is an African petro-state with a wealthy, globe-trotting elite and a thriving diaspora population. Yet it appears that comparatively few Libyan students choose to attend UK educational institutions or do so as dual nationals of another country. This impression was echoed by international education experts interviewed for this paper, one of whom stated, “I’ve never heard of them in my eighteen years in the sector.”⁷¹

The relative lack of Libyan students in UK primary, secondary, and higher education is notable considering that according to the most recent census (2011), 16,000 Libyan emigres—roughly 16 percent of Libya’s estimated global diaspora—live in the United Kingdom.⁷² Moreover, over the past several years, the number of UK visas issued to Libyan students dropped from 5,546 in 2010 to just 414 in 2017.⁷³ This decline may be due to instability in Libya since 2011, shifts within Libyan diaspora communities, or other factors.

West African PEPs' School Fees: A Possible Illicit Financial Flow

Market trends, interviews, press reports, and social media all suggest that West African PEPs' children make up a small but significant share of West African students attending UK schools and universities. Given the high cost of tuition relative to these PEPs' legitimate income and explainable assets, these expenditures arguably represent an illicit financial flow into the United Kingdom.

That said, it is difficult to approximate the financial value of these flows. In 2018, the Nigerian government identified 130,000 high net worth individuals and companies who had underpaid taxes by using tactics that included charging nonallowable personal expenses—particularly overseas school fees—as business expenses.⁷⁴ Given that, in 2017, there were 12,030 Nigerian students studying in the United Kingdom (10,540 at universities and 1,490 at independent schools), it is plausible that a significant share of their fee payments involved such tax evasion.⁷⁵ If a British university or school accepted a payment tainted by tax evasion, it could be violating UK law under the Proceeds of Crime Act.⁷⁶

Predicate crimes other than tax evasion are also likely tainting funds used to pay the school fees of some West African PEPs. According to one political journalist interviewed for this paper:

A lot of politicians are only able to afford UK schools and housing with proceeds from corruption. . . . Most of the politicians we know were not rich before they joined politics. Most of them became rich after politics. Those who were rich before they joined politics became richer after they joined politics. [For example,] I had this neighbor in my area that was appointed a director [senior civil servant] in a ministry, and suddenly, he sent two of his children to private schools [and a U.S. university]. About a year down the line, something happened and there was a change in government. He was changed and someone else was assigned in that role. He could not afford them anymore, so he had to take one off from the school and eventually removed the second. That is a pointer that he must have been getting an extra largess of office, which were proceeds of corruption.⁷⁷

Such anecdotes should serve as a red flag for policymakers and law enforcement officials because they suggest a strong correlation between PEPs' corruption opportunities and their spending on international education.

Tuition Fees Dwarf Official Salaries

Perhaps the most compelling red flag relating to West African PEPs' payments to UK educational institutions is how greatly the payments exceed their official salaries. Even these countries' senior-most government officials earn relatively modest salaries. In Ghana, for example, cabinet ministers' annual salary amounts to just £2,200 annually, not including allowances.⁷⁸ A Nigerian cabinet minister takes home roughly £16,000 annually, consisting of a modest base salary plus several large allowances and gratuities (see table 6).⁷⁹

TABLE 6
Maximum Legitimate Income of Top Nigerian Public Officeholders

Official	Salary and Allowances	Value (2020)	Value (2010)
Federal Level			
President	N14.0 million	£28,866	£58,333
Vice President	N12.0 million	£24,742	£50,000
Minister	N7.8 million	£16,082	£32,500
Chief Justice	N6.7 million	£13,814	£27,917
Senator	N5.0 million	£10,309	£20,833
Representative	N4.0 million	£8,247	£16,667
State Level			
Governor	N7.8 million	£16,082	£32,500
Deputy Governor	N7.4 million	£15,258	£30,833
Commissioner	N4.9 million	£10,103	£20,417
State Legislator	N2.5 million	£5,155	£10,417

NOTE: Totals do not include one-off or duty-specific allowances (for example, severance, furniture, and travel). Calculated using the NGN/GBP [Nigerian naira/British pound sterling] exchange rate for January 1, 2020 (£1=N485) according to <https://www.exchangerates.org.uk/> and the exchange rate for January 2010 (£1=N240) according to the Central Bank of Nigeria, <https://www.cbn.gov.ng/rates/exrate.asp>.

SOURCES: "RMAFC Begins Review of Salaries, Allowances of Political Office Holders," *Vanguard*, June 11, 2015, <https://www.vanguardngr.com/2015/06/rmafc-begins-review-of-salaries-allowances-of-political-office-holders/>; and "Remuneration Package for Political, Public and Judicial Office Holders," Revenue Mobilization Allocation and Fiscal Commission, accessed October 14, 2020, <https://rmafc.gov.ng/wp-content/uploads/2020/01/Remuneration-Package-for-Political-and-Judicial-Office-Holders-.pdf>.

Senior Nigerian civil servants earn considerably less than top officeholders. Since April 2019, the country's public service pay ceiling has been N6.2 million (£12,784).⁸⁰ Apart from a few top officials, however, most civil servants make significantly less than this amount. Many are also earning less in real terms than they were a decade ago owing to inflation, rising consumer prices, and the steady decline in the value of the naira. To illustrate, even though top civil servants earned less (N5.4 million) in 2010 than they did in 2020, that sum was worth more than twice as much in pound sterling at the start of the decade.⁸¹

Public officials' earning potential is further constrained by a constitutional restriction that prohibits them from engaging in private business. Section 2(b) of the Code of Conduct for Public Officers of the Federal Republic of Nigeria states that "a public officer shall not . . . except where he is not employed on full time basis, engage or participate in the management or running of any private business, profession, or trade, but nothing in this sub-paragraph shall prevent a public officer from engaging in farming."⁸² As such, many public servants lack alternative sources of legitimate income beyond their spouse's earnings.

So how do so many Nigerian government officials become inexplicably wealthy over their tenure? They appear to use a wide range of self-enrichment tactics that include misappropriating public property, engaging in various forms of contract fraud, collecting fraudulent allowances, accepting inappropriate gifts, soliciting bribes or kickbacks, and obtaining land grants for themselves and their associates, among many other schemes.⁸³ To explain their newfound wealth, politicians and officials often will make vague, hard-to-verify assertions about their preexisting or inherited wealth or the income generated by investments such as rental property or company shareholdings.⁸⁴ Many such PEPs will insist that—through savvy investing and disciplined saving—they have somehow prospered in a period of economic recession, rising living costs, and severe currency devaluation that has left millions of Nigerians struggling. To maintain a degree of plausible deniability about the origins of their wealth, many Nigerian PEPs will comingle their legitimate and unexplained earnings or launder their ill-gotten gains through businesses and properties they control. Some PEPs are genuinely wealthy before they enter government, but most are, in the words of one political journalist, "career politicians . . . who have never worked in their life but live off politics."⁸⁵

Nigerian PEPs' ability to accumulate illicit wealth is supposed to be constrained by the Code of Conduct Bureau (CCB), an anticorruption agency responsible for monitoring and verifying their assets. Yet the CCB itself is weak and vulnerable to political influence. The bureau's primary function is to gather asset declarations made by all public officeholders, from the president down to the most junior functionary, at prescribed intervals. Even so, public officials suffer few consequences if they simply refuse to make these declarations, as many do.⁸⁶ Underresourced and poorly staffed, the CCB is unable to check the accuracy of all but a tiny fraction of these declarations.⁸⁷ PEPs also benefit

from the veil of secrecy surrounding the CCB’s work; officials’ asset declarations are not subject to public disclosure, including via Freedom of Information Act requests.⁸⁸ As a result, it is extraordinarily difficult to determine the provenance of assets controlled by any particular Nigerian PEP.

With regard to Nigerian officials’ freedom to spend their poorly monitored assets on educating their children abroad, the Nigerian government has been reluctant to pass legislation that could constrain (or even ban) them from doing so. In 2012, the Senate neglected to pass a bill amending the constitution to discourage public officials from schooling their children abroad.⁸⁹ In 2017, the chair of the Senate’s Tertiary Education Committee dismissed calls for public officials to school their children domestically, claiming that “making a law to bar people from taking their children outside to study is something that will not be good for our country. We know that it is always good to mingle with people from other parts of the world when it comes to the issue of education.”⁹⁰

Given these weak safeguards, the modest nature of Nigerian PEPs’ official salaries, and their high risk of accumulating illicit wealth, it is reasonable to question whether they can afford big-ticket purchases such as high-end property, luxury goods, or costly tuition fees. The fast-rising average annual cost of tuition at a UK private boarding school (see table 7), for example, greatly exceeds the earnings of even Nigeria’s most senior officials.

TABLE 7
UK Boarding School Fees Compared to Top Nigerian PEPs’ Annual Earnings

Year	Average Annual Fee	Annual Earnings of a Minister or State Governor
2020	£35,289 (N17.1 million)	£16,082 (N7.8 million)
2019	£34,695 (N16.8 million)	£16,846 (N7.8 million)
2018	£33,684 (N16.3 million)	£16,116 (N7.8 million)
2017	£32,259 (N12.3 million)	£20,526 (N7.8 million)
2016	£30,951 (N9.1 million)	£26,531 (N7.8 million)
2015	£30,369 (N8.7 million)	£27,273 (N7.8 million)
2014	£28,788 (N7.6 million)	£29,323 (N7.8 million)
2013	£27,612 (N7.0 million)	£30,830 (N7.8 million)
2012	£26,340 (N6.6 million)	£30,952 (N7.8 million)
2011	£25,152 (N6.0 million)	£32,773 (N7.8 million)

NOTE: Between 2011 and 2020, a state governor’s earnings remained constant (N7.8 million) in naira terms but fluctuated in pound sterling terms depending on the exchange rate. Naira conversions calculated using GBP/NGN exchange rate as of January 1 of each year, accessed October 2, 2020, <https://www.exchangerates.org.uk/>.

SOURCES: Data published in the Independent School Council’s Annual Census, 2011–2020, accessed October 2, 2020, <https://www.isc.co.uk/research/annual-census/>.

A Snapshot of West African PEPs' Spending in the UK Education Sector

The research for this paper yielded information on at least one hundred children of West African PEPs who currently attend or recently attended schools and universities in the United Kingdom. Though this finding represents only a small sample of the total number of such students, these individuals had links to thirty different independent schools and more than sixty universities. In several instances, UK educational institutions admitted the children of West African PEPs who had been convicted of corruption or had assets seized in connection with corruption-related crimes (see table 8).

TABLE 8

Examples of High-Risk Nigerian PEPs' Payments to UK Schools and Universities

<p>Former Plateau State governor Joshua Dariye was charged with corruption in 2007 and convicted in 2018.⁹¹ Despite facing corruption charges, he was able to send his children to UK boarding schools and universities. (Note: His children have not been implicated in any wrongdoing.)</p> <p>Estimated Fees Paid: £240,000+</p>	<p>A senior Nigerian legislator who has been a career politician for the last twenty-five years has had multiple children attend independent British schools and universities. The politician also owns several high-end properties in United Kingdom.</p> <p>Estimated Fees Paid: £665,000+</p>	<p>In 2012, a British court convicted former Delta State governor James Ibori of fraud and money laundering.⁹² Despite this conviction, he continued to send his children to UK schools and universities.⁹³ (Note: His children have not been implicated in any wrongdoing.)</p> <p>Estimated Fees Paid: £286,000+</p>
<p>A prominent career politician from northern Nigeria with minimal income outside official earnings sent several children to UK private schools and universities. The politician's spouse allegedly owns high-end property in the United Kingdom.</p> <p>Estimated Fees Paid: £861,000+</p>	<p>A career Nigerian politician who has served in various government positions over two decades sent multiple children to top British boarding schools and universities. The politician also owns high-end property in the United Kingdom.</p> <p>Estimated Fees Paid: £447,000+</p>	<p>A prominent career politician from southern Nigeria sent multiple children to top British boarding schools and universities. The politician also owns luxury property in the United Kingdom.</p> <p>Estimated Fees Paid: £343,000+</p>

NOTE: Estimates have been calculated individually using publicly available information on each alumnus, the actual or estimated years they attended each institution, and the actual or estimated tuition fees for each school or university for the years they attended. Four of the examples have been anonymized because the PEPs involved have not been convicted of a corruption-related crime.

A review of publicly available information on past and serving senior Nigerian politicians that have held office since 1999 revealed that most had sent one or more of their children to a UK private boarding school and/or university.⁹⁴ All of Nigeria's presidents and vice presidents, for example, during that period had done so. Likewise, roughly 40 percent of Nigeria's current and former state governors have educated their children in the United Kingdom (see map). A comprehensive review of current and former senators, representatives, ministers, top military officers, and other senior

officials almost certainly would reveal hundreds of more examples of Nigerian PEPs whose children went to British schools. Although some would have had the legitimate assets and earnings to do so, it is likely that many more used unexplained wealth to pay for some or all of their family member's tuition fees.

MAP 1

States With Current or Former Governors Who Educated Their Children in the UK



Multiple Governors	Abia, Anambra, Bauchi, Bayelsa, Cross River, Delta, Ebonyi, Edo, Enugu, Imo, Kaduna, Lagos, Ogun, Ondo, Osun, Oyo, Rivers
At Least One Governor	Ekiti, Gombe, Katsina, Kebbi, Kogi, Kwara, Plateau, Sokoto, Taraba
No Governor/Unknown	Adamawa, Akwa Ibom, Benue, Borno, Jigawa, Kano, Nasarawa, Niger, Yobe, Zamfara

Understanding West African Elite Demand for a UK Education

To contextualize the potential corruption risks posed by West African PEPs' high demand for a UK education, it is important to review the factors underpinning this demand. Across the region, both well-established and aspiring political, business, and cultural elites view educating their children abroad as a means of obtaining and protecting their place in domestic as well as global hierarchies. These motivations are a key focus of British-Nigerian sociologist Pere Ayling's groundbreaking study of Nigerian elites who send their children to private boarding schools in the United Kingdom. Ayling's research helps frame this paper because it focuses on an overlapping subset of Nigerian elite society: parents whose primary place of residence was Nigeria who had children in UK private boarding schools.⁹⁵ Most of these parents were (or were married to) company directors, top corporate executives, or successful business owners; two parents held senior government positions.⁹⁶ All had second homes in London.⁹⁷ Although Ayling did not ask her subjects about their net worth, she notes that only two of the study's twenty subjects sent their children to schools where fees totaled less than £24,000 per year, while six subjects paid fees of more than £32,000 per child and the remainder paid amounts in between these two low and high points.⁹⁸ Most parents had two or more children in UK private boarding schools; one parent had four children doing so.⁹⁹

Drawing heavily on Ayling's research, this paper highlights four overarching factors—traditions and ties, social distinction, domestic shortcomings, and risk avoidance—that drive West African elites' demand for a UK education. The following sections explore each of these drivers in detail.

Traditions and ties

Many West African elites seeking to school their children in the United Kingdom received at least some of their education abroad, propelled either by their own family's wealth and connections or by government scholarships. For many Nigerian parents in particular, a UK education is “cherished” and an “inevitable attraction,” according to one survey.¹⁰⁰

In addition to family tradition, a growing network of connections between educational institutions in West Africa and those in Europe and North America is expanding West African students' opportunities to school overseas. Those students are able to tap into friendship and support networks that extend out into diaspora communities and increasingly transnational extended families. The proliferation of remote learning opportunities—a trend that will be accelerated by the coronavirus pandemic—will mean that UK schools and universities may soon have a new generation of virtual graduates.

In Their Own Words: Why I Attended UK Boarding School

“Going to a UK boarding school was not really a choice but a family tradition. I had the choice of choosing where I was going to; I decided my school based on location and how good the school is. My older siblings had gone to boarding school in the UK so by default I was going to boarding school in the UK. At first, I was excited because it was this whole new lifestyle abroad [but] I ended up not really liking it.”¹⁰¹

“Going to boarding school is a tradition in my family as with many Nigerian families. Before I moved to England for school, I was already in a boarding school in Nigeria. My dad thought that the education system in Nigeria was not good enough and so decided to move my siblings and I abroad.”¹⁰²

“My father picked my school, and those of my siblings, based on our respective abilities and personalities; he always claimed that he was also influenced by the schools and personalities of the friends he had at [the UK university he attended].”¹⁰³

“My older brother and his mates wanted to go abroad to school. They went, then I followed the next year. My Dad was also very focused on education, and for him, Britain was the pinnacle of education. Also, the mother of the head of our local school in Kaduna State lived near the UK boarding school we attended.”¹⁰⁴

“My parents felt like it was the next step after graduating from a British school in Nigeria. They wanted me to experience a different educational atmosphere and broaden my cultural horizon.”¹⁰⁵

“I would say that the decision to come to the UK was a decision made by my parents like many other Nigerian parents trying to provide their children with good quality education. I don't really blame their decision given the situation in Nigeria.”¹⁰⁶

“After graduating from secondary school . . . I decided to further my education in the UK. This was not necessarily a decision I made for myself; it was more of a given that I was to go to school there. . . . The school system in Nigeria is not great, so if you have the money for it, it is typical for Nigerian parents to send their kids abroad to get a better education.”¹⁰⁷

Social distinction

Established elites view UK private boarding schools and universities as a mechanism for preserving and sustaining their social status across generations.¹⁰⁸ Aspiring elites, in contrast, see it as a means of social advancement. Conscious that wealth does not automatically garner the respect and admiration of others, many of Nigeria's wealthiest and most powerful families see British education institutions as a way to convert their money into priceless cultural capital.¹⁰⁹

During the colonial and early post-independence period, well-to-do Nigerian families sought to have their children attend prestigious British-run schools like King's College Lagos and Barewa College Zaria in order to bolster their academic credentials and social status. Alumni from these schools readily ascended Nigeria's socioeconomic and political hierarchy.¹¹⁰ In contemporary Nigeria, however, private education is now widely accessible even to middle-class families; a 2015 survey of one state revealed that 80 percent of children from the wealthiest 20 percent of families attended private schools.¹¹¹ As more Nigerian students enrolled in private schools, the country's top elites no longer viewed it as a mechanism for reproducing their status. Instead, they chose to differentiate themselves by sending their children to overseas schools, which were seen to possess even more social capital.¹¹²

To further remove themselves from the masses, many elite families also have deliberately sought out schools that accept few Nigerians, thereby conferring uniqueness and distinctiveness—and thus an additional dimension of authentic eliteness—onto their child.¹¹³ In Ayling's study, one interviewee wanted their children to be “one of the very few Nigerians” attending their elite school.¹¹⁴ Another noted that “sending [her children] to where they will be mingling with more Blacks or Nigerians for that matter defeats the whole purpose of sending them to England in the first place.”¹¹⁵

Well-established elites also feel threatened by the rise of newly wealthy families, which they deride using colloquialisms like “Money Miss Road”—an expression suggesting that a person's money has somehow lost its way.¹¹⁶ For the existing elite, a UK education for their children is a more desirable use of their fortunes—one that provides a more tasteful display of their wealth than the conspicuous consumption of flashy material goods or other visible luxuries. Nigeria's *nouveaux riche* and aspiring elites, including many newly wealthy politicians and officials, see the decision to send their children to UK boarding schools in similar terms. They see it as an ascension strategy that will consecrate their heightened social status through the acquisition of perceived attributes of respectability.¹¹⁷

Ayling also has noted how many Nigerian elites believe that prolonged exposure to white, British upper-class lifestyles and practices will endow their children with the behaviors, comportment, and refined accent necessary to become nationally—or even globally—recognized elites.¹¹⁸ In the words of one parent, “I am not talking of the ordinary British people you see on the streets of London. . . .

I want my son to copy the British aristocrats.”¹¹⁹ Ayling argues that this desire for their children to adopt white British behaviors, coupled with their disdain for Nigerian styles of learning, constituted a form of “internal racism”: the devaluation of one’s own kind in order to gain power and status.¹²⁰

Even the British private schools’ comparatively complex and expensive admission process—which can take up to two years and multiple in-person visits—reinforces Nigerian parents’ perceptions of their “world classness” and exclusivity.¹²¹ Instead of being alienated by such barriers, Nigerian elite parents see them as a virtue. In the words of one Nigerian education agent, “Boarding schools in the UK are not for the average person or people who are gathering *kobo kobo* together [scraping pennies]. . . . My experience tells me that people who can afford the UK are self-made millionaires and billionaires or top politicians of high caliber.”¹²² Thus, the greater the difficulty in accessing British private boarding schools, the more that Nigerian elites prize them as a venue for reproducing and affirming their own social and cultural status.

In Their Own Words: Being Nigerian at a Top UK Boarding School

“I made friends for life and did not experience any discrimination. It was a great experience. I went on to attend university in the UK but I am now back in Nigeria working.”¹²³

“Societies like Model United Nations created an atmosphere where we could address the political happenings in our countries and often race relations around the world. We also voiced our concerns when we felt certain students and/or teachers were being racist towards us. In one incident, a student was suspended for using racist language. Overall, I felt that my views were accommodated and that [those] I interacted with appreciated my diverse views and were interested in learning about my cultural background.”¹²⁴

“Unlike many independent boarding schools in the UK, the school I attended was very diverse, so I never had an ‘only Black girl in an all-white space’ experience. However, the diversity within the school did not stop the countless micro-aggressions and other forms of covert and overt racism that my friends and I experienced over the years.”¹²⁵

“Moving to the senior school, I had a very great experience as it was a lot more diverse than the prep school. There were now more people that looked like me, and I definitely found my community. We were all very comfortable being Black in a predominantly White school and village. I did get ignorant comments though. . . . Looking back now, these comments and many other incidents were definitely micro-aggressions.”¹²⁶

“I feel like, for me, it was the fact that for the first time my diversity became my identity rather than just me being a human being. I was overvalued, I was more of a political identity rather than just any other normal teenager. I was put in any and every school picture even where it wasn’t needed.”¹²⁷

“[As a Black student,] I was also always front of house when it was student events such as open days and tours. I do not know how much that had to do with my charisma or [the school] showing off that they had diversity. The experience otherwise was good if you threw yourself into student life. Subtle racism or micro-aggressions were definitely there but hidden behind a veneer of British civility.”¹²⁸

Domestic shortcomings

Since the late 1970s, long-standing mismanagement, underfunding, corruption, and a decline in teaching standards have steadily weakened Nigeria’s education sector. Despite the country’s oil wealth, Nigeria’s public primary and secondary schools rank among the worst in sub-Saharan Africa.¹²⁹ Successive governments have grossly underspent on education and allowed official corruption to sap budgets further.¹³⁰ As a result, the sector faces a “multidimensional crisis” that is both quantitative and qualitative.¹³¹ Nigerian public universities are in a similarly poor state, laid low by funding cuts, labor disputes, and violent crime on campus. One interviewee summed up the effect of these “push” factors as follows:

Our parents sponsor our education abroad . . . to ensure that we receive quality education and escape the Nigerian university system, which has unfortunately deteriorated over the years. Moreover, I am also aware of friends and relatives that have attended universities in other African countries . . . as they do not want their education stalled by the frequent strikes that occur in public Nigerian universities that often last for months. The decision to study abroad is therefore one to escape the dysfunctional Nigerian education system and have the opportunity to attend the best universities around the world.¹³²

These sentiments are widely shared and contributed to Nigerian families’ strong demand for international education opportunities.

Risk avoidance

Affluent families' desire to send their children to schools abroad is also fueled by safety concerns.¹³³ Kidnapping for ransom is pervasive across much of Nigeria, which ranks alongside Somalia, Mexico, and Yemen as one of the world's kidnapping hotspots.¹³⁴ Criminal gangs often target wealthy politicians and business elites or their families. Undeterred by Nigeria's corrupt and ineffective police force, kidnapers are able to collect huge ransoms with relative ease.¹³⁵

Frequent incidences of gang violence (referred to as “cultism”) and sexual assault on Nigerian university campuses is another safety issue weighing on parents. In a 2015 hearing, one senator cited sexual assault as a reason why he and other politicians educate their children overseas: “The issue . . . is very prevalent in Nigerian universities, which is the reason why most of the senators you see here, their female children are not in Nigeria because they do not want lecturers to ask them for sex in favor of marks [academic grades].”¹³⁶ Although his comments oversimplify the dangers Nigerian university students face, they demonstrate why many elite families believe that their children will be safer if they study abroad.¹³⁷

Corruption Risks to the UK Education Sector

Independent schools and universities, whether in the United Kingdom or elsewhere in the world, face a growing set of corruption risks. These risks stem from the growth and globalization of the international education market as well as the vast quantity of corrupt and criminal proceeds flowing through the global financial system. Spiraling tuition fees at the United Kingdom's independent schools and universities have exacerbated these risks, putting their cost on par with other high-end purchases. The costs to send one child to a British private boarding school for one year typically amount to more than the price of a new Mercedes-Benz.

UK independent schools and universities have strong financial incentives to expand their global reach. International students generally pay much higher fees than domestic and European students, creating an incentive for institutions to go to great lengths to attract and enroll them. And even though most educational institutions accept international students in good faith, it appears few fully appreciate the corruption risks a small percentage of their international students—particularly those linked to PEPs—may pose. These risks include the following:

- **Money laundering.** Money laundering is the process of concealing the origin, ownership, or destination of illicit funds by hiding it within legitimate economic activities.¹³⁸ Money launderers use a variety of investments, financial transactions, and corporate mechanisms to sanitize the proceeds of crime and corruption, including the purchase of property and luxury merchandise. As purveyors of high-end goods—a world-class education—UK schools and universities are attractive money laundering targets. Third-party payments present a particularly high money laundering risk to educational institutions, even if they originate from companies registered in the United Kingdom.¹³⁹ Money launderers and tax evaders frequently use such companies to spend the proceeds of crime.¹⁴⁰
- **Bribery.** UK private schools and universities that allow third parties (generally, an entity that is not a close family member) to pay for a student’s fees could unwittingly be facilitating bribery. Payments made by anonymous corporate entities, friends of the family, or even individuals claiming to be distant relatives could be directed to PEPs in exchange for improperly influencing policy decisions or contract awards in another country. In 2019, the NCA warned that bribery conducted via the payment of school fees was increasing.¹⁴¹
- **Reputation laundering.** Elite educational institutions also confer respectability on dubious individuals by accepting their children as students and their philanthropy in the form of donations.¹⁴² In the words of one UK law enforcement official, “Private schools don’t just legitimise your wealth, they also legitimise your children as well.”¹⁴³ Continuing demand for controversial “golden visas”—Tier 1 investor visas that grant UK residency to individuals investing at least £2 million in the country—is driven, at least in part, by wealthy emigres’ desire to educate their children at elite British schools.¹⁴⁴
- **Smurfing.** Students may also be used—either knowingly or unwittingly—to engage in “smurfing”: a money laundering technique by which criminals or kleptocrats move illicit wealth through numerous transfers that are too small to draw the attention of banks.¹⁴⁵ The illicit funds can then be laundered by, for instance, purchasing luxury goods or paying for school fees. In 2019, UK authorities froze ninety-five UK bank accounts—many of which belonged to foreign students—that had been used to smurf £3.6 million.¹⁴⁶ Meanwhile, a UK bank recently alerted authorities about suspicious cash deposits of over £57 million linked to 600 student bank accounts.¹⁴⁷

Anticorruption Safeguards

To counter corruption risks in the education sector, the British government has an array of safeguards of varying strength. These protections include UK laws and government policies, visa checks, Know Your Customer (KYC) protocols, institutional AML tools, and the use of SARs. When actively used in tandem, these safeguards can be highly effective in both preventing and deterring individuals from using educational institutions as a conduit for illicit financial flows to the United Kingdom. To date, however, their implementation appears inconsistent and inadequate. The sector-wide failure to submit more than a handful of SARs each year is especially problematic, as it reduces law enforcement’s visibility on possible illicit financial inflows into the country. The following sections assess the strengths and weaknesses of each of the main anticorruption safeguards capable of protecting British schools and universities from tainted funds.

Educational institutions’ AML policies

Responding to high-profile scandals and government warnings, UK educational institutions are beginning to incorporate basic anticorruption safeguards into their policies and practices. Many (though not all) schools and universities have promulgated AML policies or have added basic AML provisions to their fees or admissions policies. Even though schools and universities are not considered regulated entities under UK money laundering rules, most acknowledge that they have basic AML responsibilities under the 2002 Proceeds of Crime Act.

In March 2019, the Independent Schools’ Bursars Association (ISBA) issued an AML policy guidance note, explaining schools’ obligations under UK law, listing red flags, and outlining AML best practices and procedures.¹⁴⁸ The ISBA also suggests that schools use third-party tools, such as the Flywire tuition payment processing service—a regulated entity under UK money laundering rules—and due diligence services like Refinitiv or ParentCheck+.¹⁴⁹ These services allow schools to screen names against global sanctions lists, law enforcement databases, lists of known PEPs, and adverse media reports. Many schools now use visa advisory firms like Newland Chase to vet international applicants. As one expert noted, such external advisers are often more effective at “ringing alarm bells” and providing sobering warnings to schools that previously have been ambivalent toward AML issues.¹⁵⁰

Growing awareness of AML obligations is not the only reason UK educational institutions are seeking professional help. Some are mindful of the reputational damage suffered by schools that reportedly have accepted suspicious payments or large donations from questionable sources. Likewise, some schools are mindful that any AML failures on their part could prompt UK authorities to revoke their student visa sponsor status. Losing their ability to host international students would doom most UK private boarding schools, given their financial dependence on international students.¹⁵¹

AML Policy Exemplar: Dulwich College

Dulwich College, an independent school in southeast London, has a five-page AML policy that is more detailed and forthright than those of most other UK educational institutions. Posted on the school's website, it spells out the school's AML obligations under both UK law (Proceeds of Crime Act, Terrorism Act, and Money Laundering Regulations) and guidance from the Charity Commission, the government's charity regulator. It clearly designates the school's finance director as its money laundering reporting officer, responsible for submitting SARs to the NCA as needed.¹⁵² The policy also commits the school to providing AML training to its finance and development staff.¹⁵³

Dulwich's AML policy also stands out because it commits the school to undertaking basic due diligence surrounding school fee payments and philanthropic donations. It helpfully lists potential red flags, which include transactions considered unusual because of their size, frequency, or manner of execution (given the parent's or donor's known source of income); payments involving complex or illogical arrangements that conceal the payer; payment of school fees by companies, trusts, or offshore entities; parental assets that seem inconsistent with known legitimate income; a parent who is difficult to identify; a parent who is engaged in unusual private business for someone in a prominent public position (in other words, a PEP); and a parent who is native to or resides in a high-risk country.¹⁵⁴

UK laws, regulations, and policies

Unlike other entities involved in high-value transactions, the UK education sector is subject to loose regulatory oversight by AML regulators. British schools and universities are bound by overarching anticorruption laws such as the Proceeds of Crime Act. However, government AML rules designed to improve supervision of financial institutions, casinos, dealers in luxury goods, and transaction enablers do not apply to schools and universities. Moreover, Transparency International has described the British government's existing AML rules as weak, disjointed, and structurally unsound.¹⁵⁵

Under UK AML rules, education sector professional bodies are not even tasked (as other high-value transaction enablers are) with self-regulation under the auspices of the Financial Conduct Authority's Office for Professional Body Anti-Money Laundering Supervision (OPBAS). Established in 2018, OPBAS facilitates collaboration and information sharing among those entities, their members, and law enforcement.¹⁵⁶ It also works with professional bodies to help them improve their AML supervision and reporting practices. UK schools and universities clearly could benefit from such AML expertise if their professional bodies were legally tasked with AML supervisory responsibilities.

When pressed on their AML responsibilities, many educational institutions reflexively acknowledge them but note that their primary function is to educate young people, not to serve as “first responders” in the fight against international corruption.¹⁵⁷ The staff of many smaller schools, for example, lacks the specialized knowledge or administrative budget to conduct enhanced due diligence on an international student from a high-risk jurisdiction. Schools and universities also reasonably argue that they should not bear the costs—or be held legally responsible—for re-vetting an international student who been issued a student visa by UK authorities, as their visa checks ideally should include rigorous scrutiny for corruption-related red flags.¹⁵⁸ Thus, any move to bring educational institutions into the UK's AML regime should recognize that they are the last—not the first—line of defense against illicit financial flows from high-risk jurisdictions.

UK international trade policy also can play a more constructive role than it currently does. The 2019 International Education Strategy lacks any mention of anticorruption safeguards, instead focusing on how “education exports contribute to the UK's soft power, as well as generating economic value.”¹⁵⁹ With these priorities in mind, it includes actions to improve the visa application process to “minimize any inconvenience for applicants.”¹⁶⁰ The strategy requires the Department for International Trade (DIT) Education Team to work with its UK government colleagues overseas “to identify new

opportunities for the sector and support UK providers in meeting those needs.”¹⁶¹ It also stipulates that the “[DIT] will encourage independent schools to access international opportunities, using improved education exports data to identify the top countries where there is the most opportunity for UK schools.”¹⁶² This recruitment-centered approach—if indiscriminately applied to countries where corruption risks are high—could inadvertently undermine another key strategic priority: preventing illicit financial flows into the United Kingdom.

Visa checks

Looking beyond the strategic policy environment to more operational-level safeguards, visa checks rank among the most important and effective. As it stands, all international students must apply for a student visa from UK Visas and Immigration (UKVI), an agency subordinate to the Home Office, to study in the United Kingdom. To be eligible, students must attend an educational institution licensed by the Home Office to sponsor student visas.

UK student visa checks primarily focus on whether a family is able to pay their child’s tuition fees and living costs, rather than querying the origin or legitimacy of those funds. In most instances, the more funds an applicant possesses, the more credibly UKVI views their visa application.¹⁶³ As a result, the children of inexplicably wealthy PEPs often find it easier to obtain student visas than those from more modest backgrounds. This is because UKVI expects parents to have a year’s worth of school fees in their bank account at least twenty-eight days before applying for a visa in addition to having paid any deposit required by the sponsoring educational institution.¹⁶⁴

Although stronger anticorruption checks during the visa process would make it harder for West African PEPs to spend suspect funds at UK schools, they would not be a catch-all solution. Many Nigerian and Ghanaian PEPs avoid close scrutiny because they are UK passport holders or legal residents or because they hold U.S., Canadian, or EU passports. Wealthy PEPs are also able to afford the services of immigration consultants and education advisers to help them navigate a more demanding visa process. As one expert put it, “The more money you have, the more likely you are to be granted that visa.”¹⁶⁵ Many wealthy families work through education agents or visa expediting services to make it easier to obtain a visa. In the words of one British consular official, “We are 99 percent confident that all the families she [a well-known Nigerian agent] works with are genuine and meet all our criteria so we usually grant her the visas.”¹⁶⁶ Wealthy Nigerians also have the option to

pay an additional £750—more than a return economy-class flight from Abuja or Lagos to London—for a twenty-four-hour “super priority” UK visa service.¹⁶⁷ It is unclear how anticorruption checks conducted at such short notice could be rigorous enough to be considered adequate.

Know Your Customer protocols

KYC protocols are another safeguard capable of protecting UK schools and universities from corruption risks. A well-established AML strategy, KYC involves conducting basic due diligence and scrutinizing applicants for potential red flags—such as applicants’ links to known PEPs. Many UK educational institutions already carry out such checks, often through local agents, but they typically focus on a prospective student’s ability to pay their fees or immigration-related factors that could jeopardize their visa application.¹⁶⁸

Many local agents pride themselves on knowing the students and families they deal with, but, as KYC mechanisms, they are only somewhat effective. As unregulated, for-profit consultants, most agents have strong financial incentives to recruit as many students as possible. Some agents receive trailing commissions from UK schools—often 10 percent of a recruited student’s fees in their first year and 5 percent in their second year—or even commission for every year that the child is at the school.¹⁶⁹ Recruiting students for pathway programs that lead to university are especially lucrative for agents, as they typically yield multiyear commissions.¹⁷⁰ This is not to say, however, that local education agents are inherently untrustworthy. Indeed, many such agents have become more reliable in recent years, as they have embraced international standards, leading to an overall improvement in KYC practices.¹⁷¹

It is not feasible, however, for UK educational institutions to make their local agents solely responsible for KYC for a few key reasons. First, in the case of private boarding schools, only 20 percent of families apply to British boarding schools via agents—the remainder apply to schools directly.¹⁷² UK universities likely receive a similar share of direct applications. West African PEPs, in particular, tend to apply directly because they want to avoid financial scrutiny from an education agent.¹⁷³ Second, many recruiters’ KYC approach is best described as ill-defined, informal, and subjective. When asked if they look at a student’s links to known PEPs, one Nigeria-based agent responded, “We don’t really

look at the parents of the students, what they do, whether they are politicians. We don't involve ourselves in what is none of our business."¹⁷⁴ Another recruiter noted that “many Nigerians do not want to provide evidence for the source of their money,” thus impeding KYC efforts.¹⁷⁵

A more rigorous, better standardized KYC process, by contrast, gives educational institutions the option of either refusing admission and submitting a SAR—or paying for an outside expert to undertake enhanced due diligence—if it reveals potential red flags. According to one firm that carries out enhanced due diligence investigations, its work involves a “multifaceted process that takes into account economic activities (such as an individual’s work history and investment portfolio); marriage; inheritance; and any other factors that could generate net worth” aimed at “understanding where money comes from, and specifically ensuring that this wealth originates from legitimate means and does not have any links to financial crime.”¹⁷⁶ Such a detailed report would give school or university leaders the insights needed to make an informed decision about the admission of a PEP-linked student from a high-risk jurisdiction.

Suspicious Activity Reports

SARs—short submissions that provide information and intelligence to law enforcement on suspicious or possibly criminal activity—are another potent AML tool available to UK schools and universities. Such information—which often consists of contact details, alias identities, investment activity, bank accounts, and other asset information relating to an individual involved in a suspicious transaction—constitutes potential tips that can lead to new investigations or enhance ongoing law enforcement operations.¹⁷⁷

Although banks and other financial institutions frequently use and submit SARs, they are seldom employed by professionals involved in facilitating high-dollar transactions, including lawyers, accountants, and real estate agents. UK educational institutions, meanwhile, hardly ever submit SARs (see table 9), despite repeated calls from policymakers, law enforcement agencies, and their own professional bodies to do so.

TABLE 9
SARs Filed by Education Sector Entities (Out of All SARs Submitted)

October 2015–March 2017	April 2017–March 2018	April 2018–March 2019
10 out of 634,113	35 out of 463,938	24 out of 478,437

SOURCES: National Crime Agency, UK Financial Intelligence Unit, SARs Annual Reports (accessed October 9, 2020, <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/money-laundering-and-illicit-finance/suspicious-activity-reports> on October 9, 2020).

UK government officials have urged the education sector to identify suspicious activity more effectively and report it to law enforcement. In 2018, then-security minister Ben Wallace advised schools and universities to “at the very least make a report to the NCA, flag it up which is the government campaign if it doesn’t smell right. If the agency comes back and says it’s wrong, that’s fine. At the moment we are not being proactive enough.”¹⁷⁸ Echoing Wallace’s comments, the NCA’s then-head of economic and cybercrime asserted that “we have a number of areas where I am identifying very, very high-risk individuals, suspect individuals, who have children in public schools.”¹⁷⁹ He added that educational institutions had “an overarching responsibility here to do more,” commenting that a carrying out a simple “Google check” to see if a pupil’s parents have possible criminal links is “hardly onerous.”¹⁸⁰ He went on to note that “suspicion is a very, very low threshold. . . . We’re not asking anybody to trace the source of money. What we’re really saying is: look, do some background checks.”¹⁸¹

UK education institutions have, for the most part, pushed back on these entreaties and defended their minimalistic use of SARs. In 2016, a leading universities trade group defended the industry record, stating that the low number of SARs the industry submitted reflected “the efforts of higher education institutions to prevent money laundering,” adding, “universities have detailed [AML] policies in place and internal reporting procedures. They outline how they will manage money laundering risks and comply with their legal obligations. These policies highlight the robust measures taken, such as putting specific limits on the size of cash transactions, and detailed checks to identify students and sources of funds.”¹⁸² However, instead of seeing SARs and other AML safeguards as threats to their exclusive global brand, UK educational institutions would be wise to routinize and publicize their use. In doing so, they would not only be more robust and resilient in the face of proliferating global corruption threats, but they would also protect their hard-earned positive reputations.

Conclusions

Illicit financial flows into UK educational institutions via West African PEPs are noteworthy and should receive greater scrutiny. While the majority of Nigerian and Ghanaian students studying in the UK are neither linked to PEPs nor represent a corruption risk, a small but significant share do. Analysis of this important and potentially problematic group reveals the following five conclusions:

- 1. Scores of West African PEPs’ children attend—or have recently graduated from—UK private boarding schools and universities.** In at least six recent instances, a UK school or university admitted the child of a West African PEP that had been convicted of corruption-related crimes or had their assets seized by UK courts. Among Nigerian political elites, in particular,

demand for places at UK private boarding schools and universities remains high. Enduring cultural and sociological factors underpin this demand; schooling in the United Kingdom is a proven social distinction strategy by which Nigerian elites obtain and protect their status.

- 2. Many West African PEPs pay UK school and university fees using unexplained wealth.** Rapidly increasing fees, spiraling living costs, declining currency values, and stagnating salaries have made it increasingly difficult for even senior government officials to afford UK tuition fees. While many Nigerian PEPs, for example, claim they accumulated immense wealth before entering politics, very few would be able to show convincing evidence of how they did so. Indeed, other than family savings or their spouse's salary, most civil servants and career politicians have no legitimate source of income beyond their official salary and allowances.
- 3. British schools and universities' increasing awareness of corruption risks is necessary—but not sufficient—to forestall illicit financial flows through the UK education sector.** UK schools and universities still appear reluctant to acknowledge outside criticism of the sector's AML shortcomings or to derive lessons learned from recent anticorruption failures. Some have strengthened AML protocols and involved outside experts to conduct enhanced due diligence. Such positive developments are, however, overshadowed by educational institutions' failure to file more than a handful of SARs each year as well as their continued willingness to matriculate students linked to known—and even convicted—kleptocrats.
- 4. UK government policies and programs seeking to boost the country's international education sector lack a much-needed anticorruption component.** Including modest AML safeguards into the UK's International Education Strategy would not dilute its effectiveness as a blueprint for increasing education export revenues. Doing so would, however, help government and education sector stakeholders to better tailor their marketing approaches to high-risk jurisdictions like Nigeria. Over the long term, this would reduce the sector's vulnerability to illicit financial flows.
- 5. Educational institutions in Canada, the United States, and other countries that recruit elite students from West Africa are exposing themselves to the same corruption risks as their UK counterparts.** While UK private boarding schools and universities continue to be the destination of choice for the children of these PEPs, illicit financial flows from the region to boarding schools and universities in the United States, Canada, Ireland, and Australia likely will increase over the coming decade. This continued expansion of the international education market will present new anticorruption challenges for policymakers in those countries.

A stronger policy focus on the corruption vulnerabilities of the UK education sector—and the potential threat posed by transactions involving West African PEPs—will increase its contribution to the UK economy and make it a more attractive destination for international students over the long term. Improved anticorruption safeguards will also reduce UK schools’ and universities’ reputational and legal liabilities. They could also support UK international development goals by reducing “educational escapism” by elites who choose to school abroad while neglecting domestic educational institutions. The capital flight and greater foreign exchange and currency pressures associated with paying costly school and university fees have harmed these countries’ future development and prevented them from correcting deeper socioeconomic inequalities that compound underdevelopment and can even spark violent conflict. As long as PEPs flock into the education sectors of countries like the United Kingdom, Canada, and the United States instead of investing in their own sectors, West African countries will continue to suffer a “brain drain” and financial outflows that harm their economies.

Policy Implications and Recommendations

The UK education sector’s vulnerability to illicit financial flows generated by PEPs from West African countries and other high-risk regions merits greater attention from policymakers, school and university leaders, education service providers, and law enforcement. For UK policymakers keen to tap into the economic growth potential of the country’s education sector, anticorruption considerations will need to be integrated into strategies that so far have focused on improving marketing coordination among domestic stakeholders, mobilizing international trade resources, and harmonizing immigration policy. It is problematic, for example, that the Education Sector Advisory Group—a cross-governmental group working to increase international opportunities for the UK education sector—does not appear to have discussed money laundering or other corruption risks to the sector, according to a detailed review of its official minutes.¹⁸³ Any UK government-led effort to increase international student recruitment must be reconciled with other key strategic objectives, such as combating global illicit financial flows.

This said, any corrective policy changes must address these challenges holistically and should not be unreasonably burdensome to education sector stakeholders or international students. For example, if UK policymakers change or tighten the student visa process, they must do so in a way that focuses on wealthy and politically exposed applicants and avoids adding to the obstacles middle- and working-class applicants already face.¹⁸⁴ If carefully targeted, tougher, corruption-focused visa checks could be designed and implemented in a way that minimizes any negative side effects, including

decreased demand for a UK education or increased perceptions of unfair discrimination. Such reforms could help advance the UK's strategic anticorruption interests by reducing illicit financial flows into the education sector without diminishing future education exports. Any proposed policy and programmatic steps should accomplish three objectives:

- **Clarify responsibilities.** Legislators should update UK money laundering rules to clarify the AML responsibilities of education institutions and specify situations in which they must submit SARs to the NCA. Revised legislation should also task educational sector professional bodies with self-regulation under the auspices of the Financial Conduct Authority's OPBAS.
- **Strengthen gatekeepers.** The UK government should review internal procedures surrounding—and the rationale behind—quick-turnaround visa issuance in high-risk corruption jurisdictions like Nigeria. UKVI should embrace its anticorruption gatekeeper role by incorporating basic AML checks into visa issuance guidance. When seeking proof of whether student visa applicants have sufficient funds to pay their tuition fees, UKVI should scrutinize the source of those funds, liaising with anticorruption and other law enforcement agencies as necessary. UKVI should also require schools and universities to have detailed AML policies in place before allowing them to sponsor student visas.
- **Train stakeholders.** The DIT should provide AML training to the ministry's Education Team and consider seconding an AML policy expert to it. This expert could advise the team and help it incorporate common-sense anticorruption safeguards into the UK international education marketing strategy. The UK government should also sensitize its Education Sector Advisory Group to its anticorruption concerns related to the sector.

For their part, independent schools, universities, and their intermediaries have an important role—and vested interest—in protecting the UK education sector from illicit financial flows. To start, they should strengthen internal policies and procedures designed to identify and take action in response to potential corruption risks. Both staff and institutional governing bodies should play a role in implementing them and monitoring their effectiveness. Institutions that lack detailed AML policies should emulate exemplars like Dulwich College. Education sector professional bodies like the HMC should embrace calls for reform rather than take umbrage at constructive criticism from government, the media, or anticorruption advocates.

UK educational institutions should also use the full range of AML tools, training resources, and reporting mechanisms available to them. School bursars, university finance officers, admissions staff, and recruitment agents should use due diligence services and other KYC checks (including basic internet searches) to assess risks associated with international students, especially those linked to

high-risk jurisdictions like Nigeria. They should also reach out to UK law enforcement, anticorruption regulators, and outside experts for help developing or strengthening procedures for identifying suspicious transactions and submitting SARs. Many schools and universities already scrutinize their international students' ability to pay their fees; it would not be unduly burdensome for them to conduct similar queries into students' families' *curricula vitae* and sources of income.¹⁸⁵

Nigerian and Ghanaian authorities also have a role to play in fighting educational sector corruption, both at home and abroad. To this end, their anticorruption agencies—the Economic and Financial Crimes Commission and the Independent Corrupt Practices and Other Related Offences Commission (Nigeria) and the Economic and Organized Crime Office (Ghana)—should create small but specialized units tasked with investigating educational sector corruption, including the source of tuition payments to overseas institutions. Nigeria's legislature could also amend the Code of Conduct Act to ensure that public officials must declare the amount of tuition fees they have paid and identify the source of those funds—and to make that information, along with other information contained in officials' asset declaration, available to the public. Looking beyond these tactical changes, however, West African countries' education sectors clearly need more substantive fixes, recapitalization, and sustained attention from senior policymakers who—at the moment—often choose to educate their children abroad.

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Notes

- 1 This estimated amount was calculated using recent school and university census data, average school and university fees for the 2019/2020 academic year, and the author's more speculative estimate that about 5 percent of UK university students and 30 percent of UK private boarding school students from West African countries have financial links to PEPs. This amount does not include nontuition expenditures such as travel, accommodation, and other living costs, which often equal or exceed annual tuition fees. Nor does it include tuition fees paid by dual citizens. Up to 50 percent of Nigerian students at UK schools and universities are dual nationals and are therefore counted as domestic (UK) students in institutions' census returns. This amount therefore represents a conservative estimate of unexplained wealth flowing into the UK education sector via West African PEPs.
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