

Agent Policy and Code of Conduct: Updated February 2022

This document sets out the criteria and procedures for appointing and managing our international education agents, and for supporting prospective students. This framework aims to ensure that University of Westminster staff and our education agents act with professionalism and integrity in representing the University and comply with all relevant internal and external regulations. It covers any international recruitment agent contracted to represent the University and Westminster staff who work with them.

Education Agent: Selection Criteria

It is our policy to engage in long standing relationships with agents, and in markets where we have sufficient resource to support the relationship successfully. The IRT (International Recruitment Team) has sole responsibility within the University for the appointment and management of the University's network of full degree recruitment agents. **It is the only department with authority to appoint and contract new agents.** Study Abroad agencies are managed by the Education Abroad Team. We do not **sign exclusive arrangements** with any agency to represent us.

The following criteria are used when considering a new agent for appointment:

- We appoint representatives who have specialist counselling staff who are familiar with UK higher education and UCAS / direct application processes and have a high level of knowledge of UK visa application process.
- We look for representatives who represent good quality institutions and have a strong reputation in market. We require 2 references from colleagues and peers before appointment.
- We appoint representatives with professional facilities and staff. For those agents offering online services only, we look for high quality infrastructure and processes, and breadth of access to the market, as well reviewing the in-person support services that may underpin their virtual offering.
- We generally appoint representatives based in country, and whose staff have local knowledge and language skills and who can support with additional add-on services such as; pre-departure briefings, visa advice, translation at fairs, information on their website and help with translating University marketing materials.
- We typically visit the agent's offices at least once a year, unless they are in territories where we cannot operate or infrequently travel, or are online. In these situations, regular contact and training is maintained with counsellors virtually.
- We work with UK based agents where they also have overseas offices, or where they target a segment of prospective students already within London that we cannot sufficiently service (e.g. required level of counselling or visa support and specialist language skills)
- We have agency agreements with partner institutions which supplement other academic progression contracts, e.g. HND centres
- We have a broad range of agreements with private pathway providers who offer International Foundation, Pre-masters and International year one programmes. These providers also offer highly professional counselling services for their students.

Formal Representation Process

Before any Education Agent can act as our representative, they must sign a contract with us which sets out this regulatory and ethical framework and covers the following matters:

- Commission
- Duties and responsibilities of each party in respect of the contract
- Monitoring and review arrangements to ensure obligations are fulfilled
- Arbitration and termination provisions
- Legal jurisdiction under which any disputes would be resolved
- Equality and Diversity Policy, Data Protection and GDPR clauses

Each party agrees to act in accordance with all local legislation and regulations of the Operating Territory and to act in accordance with the terms and conditions of the agent agreement and related policies published on our website within [University policies](#);

Ethical practice and Integrity

It is extremely important that any Education Agent representing UoW is honest in all professional and business dealings. Education Agents are expected to conduct themselves in a manner which reflects positively on the professional image of education agents and the University of Westminster. The principles below are intended as guidance, but not limited to:

- Maintaining the highest ethical standards and comply with any legal, statutory, regulatory and institutional requirements applicable to their Operating Territories;
- Promoting UoW Courses with integrity and accuracy;
- Seeking approval for promotional and marketing activities using Westminster's name;
- Providing full, honest and accurate information about themselves, Westminster and the courses provided by Westminster;
- Ensuring that Students are fully advised of the procedures to pursue complaints.
- Acting in the best interests of the Students, insuring there is no conflicts of interests with their application;
- Providing information to students that is accurate and up-to-date and that will enable them to make an informed judgement about the best options for them

Westminster's Education Agents should **NEVER**:

- facilitate applications for Students who do not comply with visa regulations or suggest that a Student can use a student visa for another purpose other than full time study;
- provide Students with migration advice, unless authorized to do so
- make any financial promises to students regarding discounts or scholarships
- make any guarantees to students regarding offers or acceptance for programmes at the University of Westminster, that may conflict with our admissions policies
- **take any payment from students towards Westminster tuition or deposit fee payments**
- make any false or misleading comparisons with any other education provider or their courses

How Westminster Works with Our Agent Network

We work in partnerships with our agents, which entails ongoing support and training, the provision of promotional materials, prompt response to applications/enquiries as well as participation in mutually beneficial promotional events, presentations and interviews. Detailed below are some of the typical promotional and marketing activities employed to support agents.

- Dedicated points of contact within IRT for enquiries as well as general FAQs
- Some dedicated agent rep email accounts
- Liaise with admissions about the eligibility of applications and assisting in other areas of conversion from application to enrolment
- Regular visits, in-office / London based training sessions and familiarisation trip opportunities
- Opportunities to assist Westminster staff at education fairs/exhibitions.
- Provision of training materials (including newsletter, powerpoint presentations and in country training events)

- Investment in targeted in-country activities providing cross promotional opportunities
- Access to bespoke taster lectures and subject specific academic sessions
- Joint promotional scholarships packages
- Exclusive access to our Postgraduate Agent Portal (to be launched Spring 2022)

Services Provided by The Agent Network

Agents offer a wide range of services. Their core service is to find and advise prospective students and guide them the application and admissions process. However, agents also provide a number of 'ad-on' services such as advertising, providing space for interviews, arranging interviews, developing materials, generic UK education promotion, market intelligence, student road shows and seminars, education fairs and offering staff support and assistance at education fairs. These are summarised below:

- Up to date UK visa advice and guidance to applicants
- Source of local information for parents, to include generic UK education promotion
- Advertising and PR in local media/websites and social media sites
- Facilitate interviews
- Advise on education qualifications and local institutions and access to local education institutions and school networks
- Provide market intelligence and insights
- Organise student road shows and / or small-scale education fairs
- Staffing and assistance at education fairs
- Translation services

Financial Remuneration

- The University pays commission to **contracted agents** for new students recruited onto full degree programmes. This does not include students progressing from a UG degree to PG degree at Westminster.
- Full details of our commission policy and regulations are set out in our annual Payment Guides which are sent to each agency in the summer prior to the enrolment period.
- When two contracted representatives claim commission for the same student, payment of commission/rate of commission is at the discretion of the University and may be split between the 2 parties.
- The University does not pay commission to agents for any students studying on a UK based foundation programme run through one of our contracted partners.
- Any hospitality provided by the IRT to agents is guided by the regulations laid out in the Corporate Bribery Act: <https://www.lawsociety.org.uk/topics/regulation/bribery-act-2010> and [University Gifts Policy](#).

Evaluation

We annually evaluate the enrolment performance of agents and therefore the list of agents we work with is subject to change. Due to shifts in recruitment and external environmental factors the countries we operate in is also subject to change and the related agent networks within them. The most up to date list of our agents is available on our 'you country' pages within this section 'overseas representatives' tab: <https://www.westminster.ac.uk/international/your-country>

Agent evaluation is based on performance over a minimum 3 year period review, unless the review is prompted by concerns over the conduct and professionalism of the agent. Indications of illegal or inappropriate behaviour that can be clearly evidenced will result in immediate termination of the contract.