

Agent Policy and Code of Conduct

1. Scope and Purpose

Westminster has been working in partnership with education agents for over 25 years. We endeavour, at all times, to work with our appointed agents to ensure high-quality accurate and professional advice is provided to all stakeholders.

This policy sets out the standards, responsibilities and procedures governing the appointment, management and conduct of international education agents representing the University of Westminster. It ensures that all agents and University staff operate with professionalism, integrity and in full compliance with:

- [The UK Agent Quality Framework \(AQF\)](#)
- UKVI immigration regulations
- UCAS and sector-wide admissions guidance
- University of Westminster policies and contractual requirements
- [National Code of Ethical Practice for UK Education Agents](#)

As stated in the original policy, this framework ensures that “University of Westminster staff and our education agents act with professionalism and integrity in representing the University.”

This policy applies to all contracted international recruitment agents and Westminster staff who work with them.

Details of our [commitment to the AQF](#) and specific [Information for Westminster’s Agents](#) are available on our website.

2. Principles of Agent Engagement (Aligned to AQF)

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. We adhere to the four key principles of the AQF, which are:

- Empowering student choice and enabling informed decision making.
- Ensuring good agent governance and professionalism.
- Promoting ethical agent practices, professional knowledge and competency.
- Increasing transparency and accountability.

The University’s agent network is built on the following principles:

- **Student Best Interests:** Agents must prioritise student welfare, informed decision-making, and transparent guidance at all times.
- **Integrity & Ethical Conduct:** Agents must act honestly, avoid conflicts of interest, and represent the University accurately.
- **Transparency:** Agents must provide clear, accurate information on courses, fees, visa requirements, and their own services and fees.
- **Compliance:** Agents must comply with UKVI rules, local legislation, GDPR, and University policies.
- **Professional Standards:** Agents must maintain high-quality counselling, sector knowledge, and ongoing professional development.
- **Continuous Improvement:** Agents must participate in training, monitoring, and quality assurance processes.

3. Agent Selection Criteria

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** and is the only department with authority to appoint and contract new agents. All of our contracted agents are listed on our website within the relevant [country pages](#).

We also have a broad range of agreements with private pathway providers and overseas academic institutions who offer International Foundation, Pre-masters and International year one programmes. These providers also offer highly professional counselling services for their students.

The University appoints and works with agents who demonstrate:

- Specialist counselling knowledge with highly trained staff with strong knowledge of UK HE, UCAS, direct applications, and UKVI processes.
- Provide accurate, compliant visa guidance (non-immigration advice unless authorised).
- Offer professional offices or high-quality digital infrastructure capable of delivering compliant counselling and vetting and verifying applicants for academic suitability and genuine intent to study.
- Have a strong market reputation and represent high-quality institutions.
- The University does not engage in exclusive contracts with agents or work with agents not covered by a formal contract.

We sign a contract with our appointed agents which sets out the regulatory and ethical framework and covers the following areas:

- Commission payable
- Duties and responsibilities of each party in respect of the contract
- Training and standards of professional behaviour
- Equality and Diversity and Data Protection and GDPR

4. Responsibilities of Westminster's Agents

Our agents must provide accurate information and support applicants ethically, to include:

- Offer honest, up-to-date information about the University, its courses, fees, entry requirements, and visa rules.
- Provide clear, unbiased advice to help students make informed decisions.
- Explain academic expectations, financial commitments, and visa responsibilities.
- Avoid high-pressure sales tactics or misleading claims.
- Represent the University professionally in all interactions.
- Ensure staff are trained and knowledgeable about UK HE and compliance.
- Handle student information securely and in line with GDPR and local data protection laws.
- Ensure marketing materials are approved and accurate.
- Avoid providing immigration advice unless legally authorised.
- Provide links in their marketing material or encourage students at counselling sessions to read the [Student Guide to Choosing an Education Agent](#).

Agents must never:

- **Facilitate non-genuine or non-compliant programme or visa applications.**
- Suggest or provide support for a student to use a student visa for any purpose other than full-time study.
- Provide immigration advice without legal authorisation.
- **Guarantee admission, scholarships, or visa outcomes.**
- Provide false or misleading information about the University or other institutions.

- **Request or accept tuition or deposit payments on behalf of the University.** All payments must be made directly to the University
- **Engage in deceptive, coercive, or unethical recruitment practices.**

University of Westminster

5. University Training and Support for Agents

All applications received, whether via a contracted agent or a non- contracted agent, will be treated equally and subject to our [standard admissions policies](#). To ensure we remain aligned with AQF standards and agents meet University expectations, the University provides:

- Dedicated contact points within the International Recruitment Team
- Agent-specific email channels, newsletters and training materials including via our dedicated Trainhub platform.
- Regular in-country visits or virtual engagement and digital learning materials as well as supporting UK visits and familiarisation trips and training events.
- Access to promotional materials, academic sessions, and the Postgraduate Agent Portal.
- Joint participation in fairs, interviews, and promotional events.

We encourage all our agents to undertake the [British Council training](#) where they will then be listed on the British Council database of certified agents and counsellors.

AGENT on the CAS

From April 2026, the UKVI requires universities to record the details of any education agent who supported a student's application directly on the Confirmation of Acceptance for Studies (CAS). This change is designed to improve transparency and strengthen compliance.

- The agent will be responsible for ensuring the University has up to date details of all branches where student counselling takes place.
- Westminster will be responsible for maintaining accurate agent branch records to be linked to individual applicants and included on the CAS.

At the point of CAS request:

- Applicants will confirm whether they have used the agency linked to their application, selecting the specific branch that counselled them from a drop-down list.
- To avoid delays, agents should ensure that applicants know exactly which branch supported them before they request their CAS.
- Agents must ensure that students understand the requirement to have the agent listed on the CAS and that the information provided is complete and accurate.

6. Commission & Financial Processes

A guide is sent to all agents in advance of the start of the commission claim process which gives detailed guidance on our commission processes and requirements. Below is a summary only:

- Westminster's appointed agents are paid commission for services provided to fully enrolled students on the first year of degree study for eligible students, and in line with the commission structures set out in our contracts.
- The University pays commission to contracted agents only.
- 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](#).
- In some cases commission payments are processed **independently** of Agent on the CAS information.
- No commission is payable for students who may be eligible for FAFSA funding

7. Monitoring, Evaluation & Quality Assurance

We regularly evaluate the performance of our agent network and therefore the agents we work with is subject to change. The most up to date list of our agents is available on our [your country](#) pages within the section 'overseas representatives' tab. Agent evaluation is typically 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.

The University of required to notify the UKVI within 14 working days of any changes to our authorised agent list. To include new agreements and terminations.

The University conducts ongoing monitoring of agent performance, including:

Performance Indicators

- Application quality (offer and rejection rates)
- Conversion and enrolment rates
- AQF compliance
- Analysis of UKVI Compliance or risk indicators and visa refusal trends
- Applicant or student complaints

Corrective Action: Evidence of illegal or fraudulent behaviour is taken extremely seriously and will result in immediate termination of the contract. The University also reserves the right to analyse UKVI visa refusal or immigration data, or concerns over specific agent performance to impose sanctions or restrictions on applicants from high-risk regions or specific student profiles or temporary suspension of contracts.