

## Agent Policy and Code of Conduct

### Scope and Purpose

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 IRPT (International Recruitment and Partnership 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. Study Abroad agencies are managed by the Education Abroad Team.

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

- We appoint representatives who have **specialist counselling staff** who are very familiar with UK higher education and UCAS / direct application processes.
- **Specialist 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 looking offices, facilities or infrastructure with adequate capacity to interview students, give presentations and provide the latest information.
- 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 appoint representatives who are based in country and offer add-on services for students, e.g. pre-departure briefings, official visa advice, seminars and workshops. We will also look for add-on services for the University, such as free translation at fairs, mail-outs, interview and presentation services, information on their website and help with translating University marketing materials.
- We generally visit the agent's offices at least once a year unless they are in territories where we cannot operate or infrequently travel. In these situations, regular contact 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.

We do not **sign exclusive arrangements** with any agency to represent us in named territories.

## Formal Representation Process

Before any Education Agent can act as our representative they must satisfy and agree to certain criteria that will bind and formalise our relationship. Each Education Agent is required to:

- provide a business case and appropriate answers for our internal new agent questionnaire
- provide the names of 2 referees (in the UK HE sector)

If the above documentation is satisfactory and approved by the Head of Overseas Recruitment and Partnerships, the education agent will be required to:

- enter into a written agreement to formally document the relationship between the two parties;
- disclose any previous or pending sanctions, fines or decisions imposed on them which may impact their services as an Education Agent;
- agree to act in accordance with all local legislation and regulations of the Operating Territory the Student is intending to study in;
- agree to act in accordance with the terms and conditions of the agent agreement and related University policies;

## How Westminster Works With Our Agent Network

To be effective, the IRPT and our agent network need to work in partnerships and this requires ongoing support and training, the provision of promotional materials, good response times 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 IRPT 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 (normally at least once per year). Where in country visits are not possible we provide virtual support
- In-office / London based training sessions and familiarisation trip opportunities
- Opportunities to assist Westminster staff at education fairs/exhibitions. This drives traffic through their organisations and provides a prime opportunity for them to gather key prospect contacts details. It is also a great way to provide detailed training about our course portfolio
- Provision of extensive communication and training materials (including newsletter, specialised powerpoint presentations and in country training sessions)
- Investment in targeted in-country activities providing cross promotional opportunities (e.g advertising interview sessions, events)
- Access to bespoke taster lectures and subject specific academic sessions
- Joint promotional scholarships packages
- Access to the new Postgraduate Agent Portal in order to make PG applications (April 2021)

## 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
- Advertising and PR in local media/websites and social media sites
- Provide office space for interviews
- Arrange interviews for UoW staff and local students

- Advise on education qualifications and local institutions
- Produce generic UK education promotion
- Provide market intelligence and insights
- Organise student road shows and / or small-scale education fairs
- Staffing and assistance at education fairs
- Translation services
- Agent-run promotion seminars/presentations at British Council premises overseas
- Have strong links to local education institutions and school networks

## 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 for Westminster programmes
- 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

We sign a contract with all of our agents 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

## Commission Payment and Financial Processes for UoW Agents

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:

- **The University pays commission to contracted agents only**
- We pay commission on the first year of degree study for eligible students
- We do not pay commission for students progressing from a UG degree to PG degree at Westminster.

- Agents receive commission on the fees received by the University, unless otherwise stated in their contract.
- Commission will only be paid on students whose applications have been sent by the education agent using the appropriate agent code or where the agent has informed the IRPT within the required timeframe.
- 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.
- We do not offer performance related commission or bonuses. However, we do invest more heavily in staff time and marketing to support our top agents.
- Any hospitality provided by the IRPT 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.