

Agent Management Policy



1. Introduction

- 1.1 This policy covers the appointment and management of recruitment agents which represent the University in UK and non-UK (International) markets.
- 1.2 Educational Partners and Agent Aggregators (agent organisations contracted by the University to manage a network of sub-agents) are required to follow the same principles and broadly Bath Spa University (BSU) standard operating procedures in managing their agent networks. This is covered in more detail in BSU's Protocol for Agent Management by Educational Partners and Agent Aggregators.
- 1.3 This policy has been developed in accordance with the British Council's UK Agent Quality Framework (AQF), which includes the Good Practice Guide for Providers using Education Agents, the National Code of Ethical Practice for Education Agents and reflects HE sector good practice.
- 1.4 The aim of the policy is to ensure compliance with legal and regulatory requirements, maintain ethical recruitment practices, and safeguard the integrity and reputation of the University. It covers the recruitment and appointment of new agents, training and development, their role and responsibilities, monitoring and review, relationship management and contract management.
- 1.5 Responsibility for oversight and implementation of this policy lies with the Academic Board. The policy is monitored and reviewed regularly to reflect good practice and changes to legislation.

2. Appointment of Agents

- 2.1 Having passed the BSU due diligence processes below, new agents are selected to ensure that they will represent Bath Spa University to its required standards and will deliver services to prospective students that meet their expectations.
- 2.2 The selection process will include an interview and:
 - Completion of the Agent Application Form, including details of the nature of the agent's operation, the number and location of any branch offices, the number of staff employed, and the other institutions that the agent represents.
 - References will be requested from other institutions which the agent represents and students which have previously used the agent's services.
 - Confirmation that agency staff have completed (or are scheduled to complete before the start of the contract) the British Council's Education Agent and Counsellor Training suite and sign up to the British Council's National Code of Ethical Practice for Education Agents.

- In countries which have regulatory bodies or associations, or where agents are licenced, the University will require agents to evidence licences and membership of such a body.
- Where relevant, demonstration of robust protocols to manage the use of sub-agents.

2.3 Recruitment agents will be selected based on the following criteria:

- Demonstration during the selection process of alignment with Bath Spa University's values and ethical standards as outlined in section 3. Agents are required to be reliable, professional and trustworthy providers of advice and support to students.
- No conflicts of interest.
- Proven track record of compliant and transparent recruitment practices.
- Detailed understanding of the regulatory requirements in both the UK and the agent's operating region (if relevant).
- The number of agents in a country will normally be limited proportionate to the size of the student market and geographic size of the country. This ensures the University can adequately support and service its agents.

2.4 Agent appointments will require approval by the Director of Student Recruitment & Marketing, Deputy Pro Vice Chancellor Academic Planning.

2.5 Once the agent appointment has been confirmed, an agent contract will be signed by all parties and details of the agent will be added to the University's website.

3. Ethical Standards

3.1 Bath Spa University operates ethical recruitment and, in line with its Prevention of Fraud, Bribery and Corruption Policy and Procedures, acts of fraud, bribery and other corrupt behaviour are not tolerated in any of the University's activities, at home or abroad, including where such activities are carried out by third parties acting on the University's behalf.

3.2 Recruitment agents **must maintain the highest standards of ethical business practices**, including:

- Providing prospective students with information about the University and its courses which is objective, clear and accurate - in line with consumer protection legislation.

- Targeting in promotional and recruitment activities only those students who have the potential to meet required academic, language and other entry requirements.
- Targeting only those students who have a genuine interest in completing the course of study.
- Reporting any concerns about fraud or inappropriate activity immediately to the Director of Student Recruitment and Marketing.

3.3 Recruitment agents **must not engage in any unethical or inappropriate recruitment practices, including:**

- Providing false, misleading or inaccurate information to prospective students about the course and provider.
- Engaging in deceptive practices including charging fees directly to the applicant, misrepresenting the content of, or requirements for, completion of academic courses, attendance and engagement requirements, and eligibility for student finance or student visas.
- Supporting the applicant with elements of the admissions process which should be completed by the applicant themselves, including admissions tests; essays and supporting statements; in person, online or telephone interviews; and English Language tests.
- Applying for funding, including student loans, on behalf of the applicant.
- Making promises regarding visas, employment, or other matters beyond the University's control.
- Engaging in high-pressure sales tactics including misleading and aggressive practices such as harassment, coercion, exploitation, undue influence or pressure.
- Submitting or knowingly facilitating the submission by others of false, fraudulent or misleading documentation to the University for the purposes of agent recruitment or student admission.
- Facilitating any activity that constitutes activity that is not acceptable under the University's Academic Integrity Policy, including recommending the use of Generative AI tools or essay writing services.
- Submitting personal applications for study; or engaging in any practice with other agents to facilitate the submission of personal applications for study without approval by the University.
- Sub-contracting any recruitment activity to other agents, organisations or other individuals without the relevant approval by the University and contractual agreements.

3.4 Appendix A outlines the ethical standards and provides guidance on how compliance with each standard can be demonstrated.

4. Training and Development

4.1 Bath Spa University will provide training for new agents and annual training for all agents (including agents used by Educational Partners and Agent Aggregators). The training will include covering:

- The requirements of this Policy.
- The University and its region, courses, and entry requirements.
- Bath Spa recruitment, admission and Confirmation of Acceptance for Studies (CAS) processes.
- Compliance with UK and International recruitment regulations.
- Ethical recruitment requirements and University policies for Agent Management, Admissions, Accreditation of Prior Learning, and Criminal Convictions.
- Understanding of safeguarding protocols and the University's expectations.
- Requirements for the proper use of the University's marketing, recruitment materials and branding.
- Commission payments.

4.2 New agents will also be provided with:

- Training and access to the agent portal and processes for the submission and tracking of applications.
- A named account manager and contacts in relevant teams within the University.
- The escalation process in the event of any issues.

5. Monitoring and evaluation of performance

5.1 The Head of International Recruitment will be responsible for day-to-day contact with International agents and will monitor and report regularly on agent performance.

5.2 The Director of Student Recruitment & Marketing and Deputy Pro Vice Chancellor Academic Planning will be responsible for day-to-day contact with the appointed officer at each Education Partner which has oversight of agent performance and will receive reports on agent performance.

5.3 Spot checks on agent practice and activity, including admitted students, will be undertaken to ensure the accuracy of advice and information, and in the case of international agents, that all UKVI requirements are being met.

5.4 Bath Spa University will also conduct an annual performance review of all recruitment agents (including those used by Education Partners and Agent

Aggregators, as outlined in BSU's Protocol for Agent Management by Educational Partners and Agent Aggregators) against the expectations laid out in the agent contract, including feedback from staff and students.

- 5.5 Any under-performance against targets will be considered as part of the annual review process and may lead to termination of agent contracts.
- 5.6 The University may immediately terminate the contract if there is any evidence of negligence or incompetence, non-compliance with expected standards or any activity likely to bring the University or its partners into disrepute.
- 5.7 Any issues with international, domestic or partner agents will be investigated by the Director of Student Recruitment & Marketing and Deputy Pro Vice Chancellor Academic Planning.

6. Renewal and Termination of contracts

- 6.1 All agent contracts are time limited, with a maximum of up to 3 years. As well as annual performance review, during the final year of the contract, agent performance and compliance will be reviewed to decide whether to renew or terminate the contract at the end of the contract period.
- 6.2 Contracts also include clauses for immediate termination with the agreement of both parties, and in the case of serious breach of compliance or trust.

7. Educational Partners and Agent Aggregators

- 7.1 Agent management by Educational Partners and Agent Aggregators will follow the principles outlined in this policy but the standard operating procedures may differ in some areas. For example, the officers and committees involved in the approval and monitoring of agents.
- 7.2 A protocol has been developed to outline the expectations of Educational Partners and Agent Aggregators for the management of agents.

8. Definitions

'Agency': An organisation that deals directly with students on behalf of the University. They are sometimes referred to as student recruitment agents or student recruitment representatives.

‘Agent’: An agent is an individual person that deals directly with students on behalf of the University. They are sometimes referred to as student recruitment agents or student recruitment representatives.

‘Agent Aggregators’: Agents which have a network of sub-agents working for them to reach a broader pool of prospective students.

‘Educational Partner’: An institution which Bath Spa University works with for the delivery, validation or quality assurance of BSU courses.

‘Entry requirements’: The minimum grades, qualifications and competencies required to get a guaranteed place to study on a programme.

‘Home Student’: a student with right to stay in the UK who registers on a programme at the University or one of its Educational Partners.

‘International Student’: a student who registers on a programme at the University or one of its Educational Partners from a country outside the UK.

‘Sub-Agent’: A student recruitment agency working on behalf of an Agent Aggregator with no direct relationship with the University.

‘UKVI’: UK Visas and Immigration is part of the UK Government Home Office and is the UK department which makes decisions on who has the right to visit or stay in the UK.

Appendix A: Ethical Standards for Agents representing Bath Spa University and its Educational Partners

These ethical standards focus on ensuring agents maintain a high level of professionalism, ethics, and compliance with legal and regulatory frameworks, while prioritising the best interests of students and the reputation of Bath Spa University and its Educational Partners.

Adherence to each standard can be evidenced through documented procedures and staff handbooks, use of marketing and recruitment materials and communications, audit of admissions documentation and/or student feedback.

	Staff Handbook/ Procedures	Marketing Materials	Admissions audit	Student feedback
1. Integrity and Professionalism				
• Agents must act with honesty, reliability, and professionalism at all times.	•	•	•	•
• They should represent Bath Spa University and their own profession positively, ensuring their conduct reflects the highest ethical standards.	•	•	•	•
• Only genuine students with the likelihood of meeting entry requirements should be recruited.	•		•	
2. Accuracy and Transparency				
• Agents must provide clear, honest, and accurate information about Bath Spa University, its facilities, courses, entry requirements, fees, living costs and the student experience.	•	•		•
• All advice and guidance must be consistent with approved university marketing and recruitment communications.		•		
3. Adherence to Legal and Regulatory Requirements				
• Agents must comply with all relevant national and international laws, including visa and immigration regulations, data protection laws, UK Consumer Protection Legislation and the UK Bribery Act 2010.	•	•	•	

	Staff Handbook/ Procedures	Marketing Materials	Admissions audit	Student feedback
<ul style="list-style-type: none"> They are expected to stay informed about the legal frameworks that govern their operations and work in full compliance with all institutional and regulatory standards. 	•		•	
<ul style="list-style-type: none"> They are expected to have in place systems to identify and avoid the submission of fraudulent or misleading student documents. 	•		•	
4. Ethical Marketing and Fair Competition				
<ul style="list-style-type: none"> Agents must engage in fair marketing practices and not use negative or misleading comparisons with other institutions. 	•	•		•
<ul style="list-style-type: none"> They should promote Bath Spa University's programs ethically and accurately, avoiding tactics that may mislead prospective students. 	•	•		•
5. Student-Centred Advice and Support				
<ul style="list-style-type: none"> Agents must always act in the best interests of prospective students, ensuring they receive clear guidance and support throughout the application process. 	•	•	•	•
<ul style="list-style-type: none"> Agents should provide realistic and tailored advice based on each student's individual circumstances, without discrimination, and ensure students understand their rights and responsibilities. 	•	•		•

Document Details

Responsible Office: Future Students

Responsible Officer: Director of Student Recruitment and Marketing

Approving Authority: Academic Board

Date of latest approval: April 2025

Effective Date: September 2025

Related Policies and Procedures: Admissions Policy, Accreditation of Prior Learning, Privacy Policy for Applicants and Students, Declaring a Criminal Conviction

Supersedes: N/A

Next review due: September 2028