

# UNIVERSITY OF LEADING THE WAY WESTMINSTER

## Agent Policy and Code of Conduct

The University of Westminster values highly the relationships that it has been building with its appointed representatives around the world for more than two decades. We believe that we offer an exceptional service in respect of the training and support that we provide. In return for this support and the ability to represent our interests in respect of advice to potential students, we feel it is important that our agents adhere not only to the letter of the law in our contracts, but to the high standards of behavior that we expect.

The Code of Conduct forms part of our commitment to the Agent Quality Framework, which the University signed in December 2023. The Code of Conduct follows closely the existing [Guide to good practice for education agents: Partnering for Quality](#), and the [The National Code of Ethical Practice for Education Agents](#) as published by the British Council - which should be read in conjunction with this Code.

Our Code sets out the conduct we expect, contractually and otherwise, our representatives to follow and follows principles provided in the [Student Guide to Choosing an Education Agent](#) which can be accessed on our [country pages](#).

This document also sets out the criteria and procedures followed for the appointment of our international education agents and relevant complaints procedures should our services, or those of our agent network fall below standards expected.

## Ethical practice and Integrity

The principles below are intended as guidance:

- Agents appointed by the University of Westminster shall always conduct themselves with integrity, and in a manner that reflects positively on the image of their profession and of the University of Westminster. We expect our agents to be reliable, professional, honest and trustworthy providers of advice to students. This guiding principle informs the others that follow and encompasses all aspects of an agent's activities.
- Agents shall promote themselves and the University of Westminster in a professional and ethical manner, ensuring that their activities reflect best practice. The University of Westminster expects both ethical behaviour ('doing the right thing') and high standards of professionalism ('doing the job well') from all those agents who represent our interests. 'Best practice' means that an agent's activities should not be of a kind that might bring discredit either on the University of Westminster, or on the UK Higher Education sector generally. It also means adopting a reflective attitude of continuous self-assessment, and constantly striving to improve.
- Agents appointed by the University of Westminster shall be honest in communicating information about themselves or the University, be that in published, oral or any other form. They shall not knowingly or by a failure of professional standards provide or disseminate false, incomplete or misleading information. Such information shall include, but not be restricted to information about facilities, entry requirements, admissions processes, course content, fees and living costs. All claims made by an agent about itself, the University of Westminster or client students shall be

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capable of being substantiated, whether to the University or to other appropriate parties as United Kingdom Visas and Immigration. The advice and information you provide as an agent of the University of Westminster must be consistent with the UK Competition and Markets Authority Advice on Consumer Protection Law.

- Information provided to potential students shall be sufficient and accurate enough to enable them to make an informed judgement. Agents shall not in any published or orally delivered information omit any fact which may reasonably be of material relevance to a student, where an omission might be construed as being misleading. The accidental production or dissemination of incorrect or incomplete information is likely to be viewed as evidence of a failure to adhere to professional standards, except where there may be compelling evidence to suggest otherwise.
- Agents shall promote themselves and the University of Westminster fairly, ethically and without recourse to unfavourable, inaccurate, misleading or negative comparison with other institutions, nor shall they employ unfair or unprofessional practice to damage the interests of other institutions.
- Agents shall always act in the best interests of students or prospective students as well as of the University of Westminster. They shall offer advice and counselling and provide information to students, and where appropriate their parents or sponsors, in a manner consistent with this principle.
- Agents shall conduct themselves with due regard to the regulatory conditions in the markets in which they operate. They shall comply with all applicable national laws, regulations and official policies.
- Agents shall conduct themselves with due regard to the need for transparency and openness in all their dealings with the University of Westminster.
- Agents shall adhere to the University's contractual obligations in respect of the UK Bribery Act of 2010. A breach of the contract signed between an agent and the University of Westminster may lead to immediate termination of the Contract.
- Agents shall support ongoing staff development and training for their counselling staff to enhance their professional development and knowledge of the UK education system, its institutions and related UK visa and immigration policies.

Education Agents representing the University of Westminster must **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.
- facilitate applications for students whose documentation is found to be fraudulent.
- 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](#) or [data protection policies](#)
- **take any payment from students towards Westminster tuition fee or deposit fee payments.**

## Education Agent: Appointment and Representation

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. Some of our agents may have additional contractual agreements in place with our Education Abroad team in relation to recruitment to our Study Abroad and summer school offer but these are managed by the Education Abroad Team. We do not **sign exclusive arrangements** with any agency.

The following criteria are used when considering an agent for appointment:

- We appoint agents who have skilled 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 agents who represent good quality institutions and have a strong reputation in market. We require two references from colleagues and peers before appointment.
- We appoint agents 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 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 try to visit at least one of the agencies offices at least once a year unless they are in territories where we cannot operate or infrequently travel or are online only. 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 and the UK 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, English language testing.
- We have a broad range of agreements with private pathway providers who offer International Foundation, Pre-masters, and International year one and International Year two programmes. These providers also offer highly professional counselling services for their students and often work with their own network of agents.
- Before any Education Agent can function as our representative, they must sign a contract with us. 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.
- The University pays commission to contracted agents only.

## 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.
- Support visits both in country and to the University of Westminster
- Where appropriate, provide London based training sessions and familiarization trip opportunities.
- Opportunities to assist Westminster staff at education fairs/exhibitions.
- Provision of training materials (including newsletter, powerpoint presentations and in country

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training events)

- Where appropriate, receive investment in targeted in-country or digital campaigns and activities providing cross promotional opportunities.
- Provide access to bespoke taster lectures and subject specific academic sessions.
- Joint promotional scholarships packages
- Exclusive access to our Postgraduate Agent Portal
- Provide access to our training materials and portal to be launched via Trainhub from November 2024

## Complaints Procedure

- We take all substantiated complaints very seriously and seek to resolve them in a prompt and fair manner.
- If any applicants have any significant concerns regarding the assistance and services they receive from our contracted agents then please contact us at: [GRAAdmin@westminster.ac.uk](mailto:GRAAdmin@westminster.ac.uk) this will then be escalated to the relevant staff within the International Recruitment Team or Senior Management as applicable.
- For our contracted agents, any concerns or issues should be raised via the relevant country manager or can be escalated by contacting [GRAAdmin@westminster.ac.uk](mailto:GRAAdmin@westminster.ac.uk)

## Evaluation of our Agent Network

- We annually evaluate the enrolment performance of agents and therefore the list of agents we work with is subject to change. In addition, due to changes in external economic, geopolitical and environmental factors the countries we operate in is also subject to change. 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 agency or its individual counsellors. Indications of illegal or inappropriate conduct will be thoroughly investigated and where it can be clearly evidenced this will result in immediate termination of the contract.