



# A Partnership for Quality: A route to a UK Quality Framework with Education Agents

2021



Supported by:



Report developed on behalf of BUILA and UKCISA by:



www.edified.com.au

## Contents

<b>Executive Summary</b> .....	<b>5</b>	<b>Part Three: The Education Agent Quality Framework</b> .....	<b>42</b>
<b>Part One: Project Outline</b> .....	<b>9</b>	3.1 Government Legislation .....	43
1.1 Background .....	9	3.1.1 Immigration Act 2016 .....	43
1.2 Project Scope .....	9	3.1.2 Bribery Act 2010 .....	44
1.3 Approach .....	10	3.1.3 Children Act 1989 and Working Together to Safeguard Children Statutory Guidance .....	44
<b>Part Two: The Models, Functions and Compensation of Education Agents, and the Operating Environment</b> .....	<b>14</b>	3.1.4 Competition Act 1998 .....	45
2.1 Definition of an Education Agent .....	14	3.1.5 Data Protection Act 2018 .....	45
2.2 How Engaging an Education Agent Usually Works .....	18	3.1.6 Money Laundering and Terrorist Financing (Amendment) Regulations 2019 .....	46
2.3 Timing and Delivery of Education Agent Services .....	20	3.1.7 Consumer Protection Law .....	46
2.4 Education Agent Service Value and Quality .....	22	3.1.8 Local Legislative Environment (Source Market) .....	47
2.5 Agent Models / Case Studies .....	25	3.1.9 Conclusions About the Legislative Environment .....	47
2.6 Why Do Students Use Education Agents? .....	29	3.2 Sector Approaches .....	48
2.7 Why Do UK HEIs Use Education Agents? .....	30	3.2.1 The London Statement .....	48
2.8 The Education Agent Market for the UK .....	32	3.2.2 British Council Education Agent and Counsellor Training Suite .....	50
2.9 Areas of Concern / Opportunities for Improvement .....	33	3.2.3 British Council Good Practice Guidance and Additional Resources .....	52
2.9.1 Which Education Agent Represents Which HEI? .....	33	3.2.4 The UK Quality Assurance Agency for Higher Education's Quality Code for Higher Education .....	53
2.9.2 Student Commission Transparency .....	34	3.2.5 Conclusions on Sector Approaches .....	54
2.9.3 Student Paid for Services .....	35	3.3 Institutional Frameworks – Good Practice .....	58
2.9.4 Commission Driving Education Agent Behaviour .....	35	3.4 Comparison of Approaches With Competitor Destination Countries .....	62
2.9.5 Sub-agents .....	37	3.4.1 Australia .....	64
2.9.6 Aggressive Marketing Strategies .....	39	3.4.2 Canada .....	65
2.9.7 Fraudulent Documents .....	39	3.4.3 France .....	65
2.10 Student Suggestions on How Education Agents Could Improve Their Services .....	40	3.4.4 New Zealand .....	66
2.11 The Impact of Coronavirus on Education Agent Models and Functions and the Need for Future Research Validation .....	41	3.4.5 United States of America (USA) .....	67
		<b>Part Four: Recommendations and Roadmap</b> .....	<b>68</b>
		4.1 Recommendations .....	70
		4.2 Detailed Recommendation .....	72
		4.3 Recommendations Roadmap .....	74



## Executive Summary

In late 2019, early 2020, the Department for Education (DFE) and the Office for Students (OfS) sought feedback from the UK higher education sector on potential solutions to increase quality in student recruitment practice. The Secretary of State for Education also made a request to the Office for Students to include international students in their review of admissions systems.

This report, commissioned by the British Universities' International Liaison Association (BUILA) and the UK Council for International Student Affairs (UKCISA), seeks to help inform these considerations and reviews. It clarifies the role of education agents, details the UK's current quality assurance practices for education agents and compares them with those of other countries, then makes recommendations on how the UK might develop its approach. The report is split into four sections:

1. The project approach
2. Explanation of what education agents are, what they do and what they contribute
3. The quality assurance framework in the UK compared with competitor destination countries' approaches
4. Recommendations for a future approach that will benefit education agents, UK HEIs and, most importantly, the students themselves

On behalf of BUILA and UKCISA, Edified surveyed over 300 education agent managers, 500 international students, 2/3 of which used an education agent, and over 100 HEI staff. They further explored findings through focus groups and in-depth interviews and sought perspectives and insights from a range of government and sector stakeholders.

In 2018/19, UK-based HEIs welcomed over 203,000 new international students from outside of the EU, who, through the course of their studies, are estimated to contribute in excess of £23.75 billion to the UK economy. Approximately 50% of these students used the services of an education agent to help gain admission to a UK HEI and navigate the UK's visa processes, broadly equating to a contribution of £11.88 billion to the UK economy from a year's intake of new enrolments.

The monetary value of education agents' work is only one factor. This research highlights that the value of their services is well recognised by students, institutions and most stakeholders. Education agents generally facilitate a smoother application and enrolment journey, help to reduce the administrative burden on student administration teams and government visa officials, and are largely committed to continual professional development. They are an essential component of UK HEIs' international student recruitment strategies and to the UK's ability "to increase the number of international higher education students hosted in the UK to 600,000 per year... by 2030." (The UK Government's International Education Strategy, 2019).

## The Project Team

### PROJECT CONTROL GROUP

**Philippa Collins-Robson**  
BUILA

**Julie Allen**  
UKCISA

**Charley Robinson**  
GOLDSMITHS, UNIVERSITY OF LONDON

**Martin Maule**  
UNIVERSITY OF LEEDS

**Andrew Mandebura**  
UNIVERSITY OF HUDDERSFIELD

### EDIFIED TEAM

**Oliver Fortescue**  
PROJECT LEAD

**Chris Davis**  
INTERNATIONAL EDUCATION EXPERT

**Lyndell Jacka**  
INSIGHTS DIRECTOR

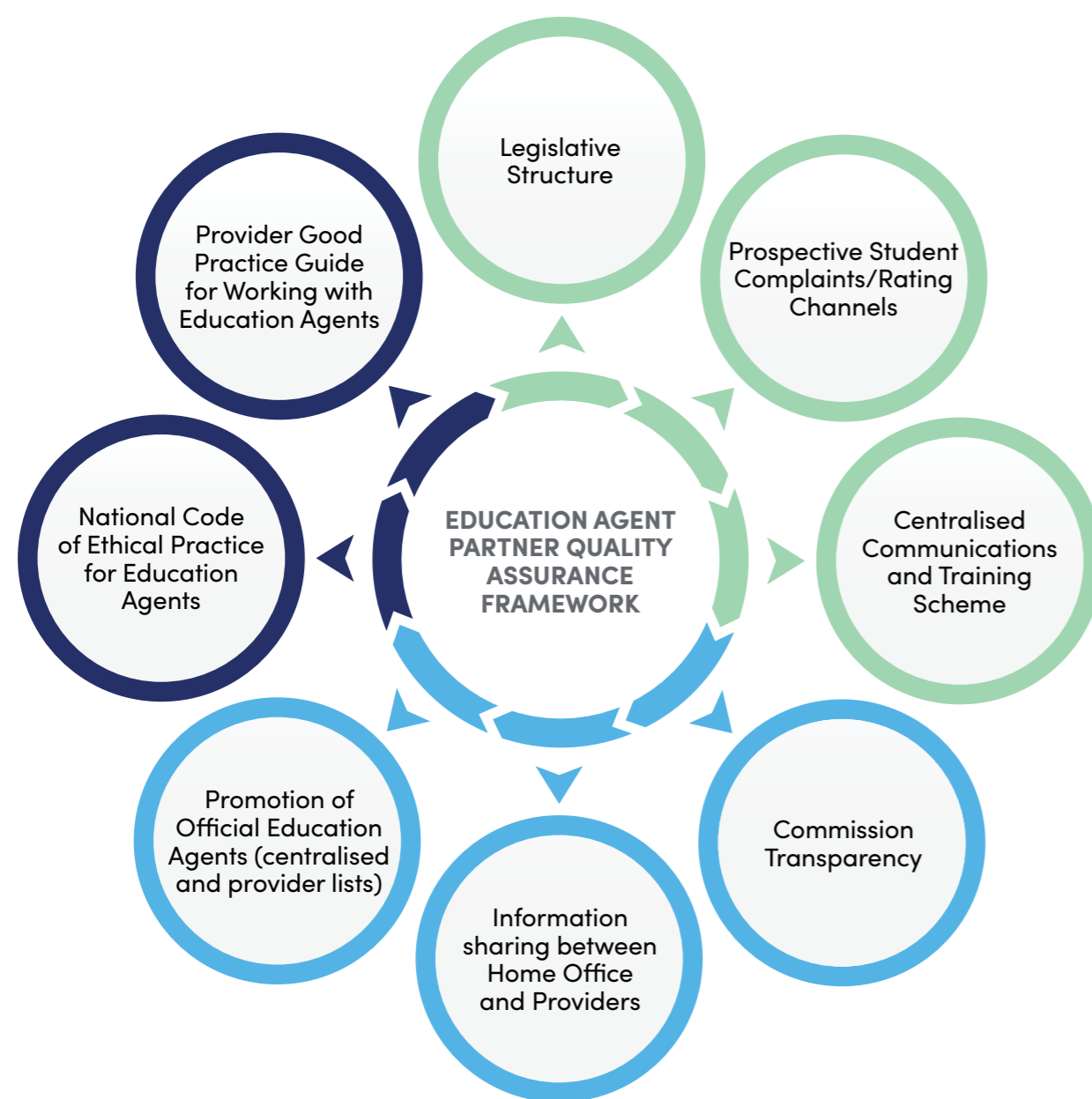
**Hayley Shields**  
STUDENT EXPERIENCE AND AGENT EXPERT

**Mark Pettitt**  
FOUNDER

**Raelene James**  
CREATIVES & DESIGN

The report highlights that the UK higher education sector has a range of risk-mitigating approaches in place. Education agents and their contracting HEIs are bound by the UK's legislative framework including consumer law, data protection, immigration and bribery acts and child protection legislation. Furthermore, the QAA's Quality Code for Higher Education regulates the sector's recruitment practices. This is complemented by voluntary codes of practice, best practice guidelines, and a fee-based training programme delivered by the British Council. The research found that there was strong institutional practice in managing education agent relationships across a large cross section of UK HEIs. However, no industry is without risk, and the research did identify some issues related to the use of education agents. These issues were largely centred on perceptions of overtly commercial behaviour and the transparency of business arrangements, plus concerns about the quality of some mainly uncontracted education agents.

Given there is a good amount of structure in place – more than in the USA, Canada or France – further legislation or regulation seems unnecessary, but the findings which are highlighted throughout the report, point towards areas where existing education agent management practice could potentially be strengthened. The report suggests the creation of a Quality Assurance Framework:



KEY:  
■ Existing but may need minor modification / better communication  
■ Some existing practice, needs greater adoption  
■ Newly developed initiative built on existing practice

The report identified three primary recommendations that would complete the Education Agent Partner Quality Assurance Framework. Implementation work began in early 2021.



**RECOMMENDATION ONE:  
DEVELOP AND PROMOTE A NATIONAL CODE OF ETHICAL PRACTICE FOR UK EDUCATION AGENT PARTNERS**

Introducing a single Code of Ethical Practice for UK Education Agents will set expected standards for all education agents working with UK providers and will help regulate their practice. It is recommended that the new Code be developed through a co-design process with education agents, using the London Statement and British Council 'Good practice guide for education agents' as a base. To be effective, it will need to be widely adopted by UK providers, ideally across the international education sector, as the benchmark they use for their education agents and communicated in a coordinated fashion. The Code should be integrated with the following recommendations.



**RECOMMENDATION TWO:  
REORGANISE THE EDUCATION AGENT TRAINING SCHEME TO INCREASE ACCESS AND ENGAGEMENT**

The Code should be supported by an updated and accessible education agent training suite. The British Council's training suite covers a lot of the key topics that education agents need to be briefed on but when compared with competitor destination market schemes, it is not as widely used by education agents. The report found that the cost, time taken to complete the full programme and the lack of recognition for the education agent company were all factors that were limiting its uptake. In collaboration with the British Council, education agents and key stakeholders from across the international education sector, the training content should be reviewed to identify core content that the UK sector wants all education agents to be aware of and advanced content which might be delivered in some form of continuing professional development. Similarly, the cost structure needs to be considered in conjunction with articulating the tangible benefits of completion so that education agents place a greater value on programme; it is important that the company not just the completing counsellor are recognised on the British Council website. Ways in which core content can be offered free of charge should be explored. The research found that providers have an important role in promoting and valuing the education agent engagement with the training. In many markets the British Council conducts regular agent briefings. This practice should be adopted across source markets and integrated with the training scheme to provide a continuous professional development culture that education agents benefit from. Increasing the value placed on the training and the number of trained education agents will strengthen the UK's brand in source markets and help deliver accurate advice to prospective international students.



**RECOMMENDATION THREE:  
DEVELOP AND PROMOTE A GOOD PRACTICE GUIDE FOR PROVIDERS USING EDUCATION AGENTS**

To maximise the integrity of the UK's education agent quality assurance framework, all providers should adopt good practice in appointing, training, supporting and managing education agents; ultimately, the contracting provider is responsible for their education agent's practice as it relates to their institution, and must provide the education agents with the tools to accurately represent them. The research found widespread good practice in the HEI sector from which to build. A step-by-step 'Good Practice Guide for Providers Using Education Agents' covering these areas and developed in conjunction with sector professionals, education agent partners and key stakeholders, will allow UK providers to benchmark their practice and adjust it to make sure it is providing an excellent prospective student experience as well as the foundations of a strong provider-education agent partnership. This will cover best practice case studies, approaches to legally sharing information across the sector and to and from the Home Office, student centric complaints processes and proforma questions for incorporation in exiting new student surveys. Transparency requirements (including regarding commission structure – not amounts), and an Education Agent Partner Quality Assurance Health Check proforma for internal audits built out of the QAA Quality Code, will help to build on the already strong practice of UK providers. The Guide would work in tandem with the Training and the Code and will be an online resource that will be updated with market/stakeholder developments.

## ADDITIONAL CONSIDERATIONS

Cross sector support and adoption of these initiatives will provide a united quality improvement message to key source markets, so implementation work needs to engage all UK international education sectors. Furthermore, working closely with the Home Office to develop elements of the training and the guide, including determining how best to share education agent information will help maintain the integrity of the UK's student visa system. It is understood that legal advice and consultation with education agent partners will be required for this to be equitable and appropriate.

To successfully achieve the targets laid out in the UK's International Education Strategy, it is critically important that these initiatives are communicated to students, education agents and stakeholders in source markets in a timely manner allowing for a period of transition to the UK's updated Education Agent Partner Quality Assurance Framework. The report recommends launching the initiatives in July 2021 with a two-year transition period including regular reviews and updates to ensure they are having the desired effect.

Unofficial agencies remain a difficult issue to solve, but through the above, it will be significantly clearer to prospective students who the official education agents of the UK providers are and give these international student recruitment partners greater recognition while helping them to continuously improve their practice. B2B education agents remain a legitimate and valuable channel for the recruitment of international students. It is important that any international education provider contracting with such organisations ensures that the appropriate protocols are in place to manage these business models successfully. We propose that these should be inline with the recommended National Code of Ethical Practice for UK Education Agents.

A preferred or accredited education agent scheme was considered and remains an option in the future but is unlikely to develop best practice beyond that which is achievable through these primary recommendations; moreover, such a scheme is potentially expensive to operate and may position the UK negatively compared with competitor destination countries. Further consideration may be worthwhile after the proposed transition and review period.

In line with DFE and OfS goals, implementing the three recommendations concurrently would effectively encourage greater transparency around the use of education agents, including commission practices, and could perhaps lead to HEIs receiving a kitemark for their use of reputable education agents (those signed up to the Code). Furthermore, updating the training will help education agents to provide "better information and guidance on how to apply to universities and for visas".

Implementing the recommendations will help deliver a world-class quality assurance framework that is well aligned with the UK education sectors quality brand identity and that will benefit ethical education agents, UK providers, industry stakeholders and agencies and, most importantly, qualified international students.

## Part One – The Project Outline

### 1.1 BACKGROUND

The British Universities' International Liaison Association (BUILA) and the UK Council for International Student Affairs (UKCISA) commissioned Edified to conduct research into the role education agents play within the higher education sector in the UK. The purpose of this research has been to:

- clarify the models (or personas) and functions of education agents and the marketplace in which they operate
- provide an evidenced-based framework for decision-making
- confirm or disprove some prevailing views about education agent use
- offer students, education agents and sector stakeholders a voice
- obtain insights and recommendations for the future

Limitations: This work has been done with a focus on HEIs only. While much of the research is likely to be relevant to other UK education sectors, all findings are in relation to HEIs. Students from European Union (EU) countries were not included in the work because at the time of writing, they paid domestic fees and their use of education agents was relatively limited<sup>1</sup>. This situation is likely to change, following the UK's exit from the Union.

### 1.2 PROJECT SCOPE

Under the guidance of a Research Control Group made up of BUILA, UKCISA and HEI representatives, Edified was engaged to:

- describe what an education agent is and what they do – case studies or 'personas'
- provide an understanding of the value of the education agent's role to:
  - international students (from outside of the EU)
  - UK HEIs
  - the integrity of the UK visa and immigration systems
  - the UK economy
- determine best practices in HEI management of education agents
- describe and evaluate the education agent quality assurance framework in the UK
- compare the national practice in education agent quality assurance frameworks in competitor destination countries with the UK's, and determine the pros and cons of them
- recommend future approaches

<sup>1</sup> Details of the cohort surveyed are outlined in Appendix 1: Student Survey and Focus Groups

### 1.3 APPROACH

To ascertain the above, Edified has undertaken a mixture of primary and secondary research.

#### Review of Previous Research

Edified identified a number of previous research projects that broadly covered the 'education agent-HEI' relationship and used these to provide context and reference material, and to help ensure that this research built on what was already known. Some HEIs also granted access to internal research and documentation regarding their HEI-agent-student relationships.

#### Online Survey of HEI Staff

The online survey of HEI staff was targeted at recruitment, compliance, admissions, international managerial and executive staff, with questions adapted to the role functions. It consisted of a mix of 33 quantitative and qualitative questions and was designed to provide an understanding of:

- the services provided by education agents, and associated perceived risks
- the way in which HEIs mitigate risk in the HEI-agent-student relationship
- their views on how the UK might better manage the industry to ensure the integrity of the international student recruitment market to UK HEIs
- the size and scale of the industry

The survey was distributed through BUILA, UKCISA and Universities UK International (UUKi).

- 105 respondents
- 91% were in an international recruitment role at their HEI
- Nearly half of the HEI respondents are from Post-1992 universities
- Across their 2019 intakes, 81% of HEIs enrolled more than 500 international students
- All HEI respondents used at least one education agent, with some using up to 400. Approximately half of the HEIs' international students are placed by an agent

#### Location of HEI Campuses that Enrol International Students

England – East	2%	England – South West	8%
England – East Midlands	7%	England – West Midlands	3%
England – Greater London	27%	England – Yorkshire and the Humber	10%
England – North East	1%	Northern Ireland	1%
England – North West	14%	Scotland	12%
England – South East (excluding London)	11%	Wales	14%
		UK – offshore campus	2%

Note: HEI respondents could select more than one location

#### Online Survey of Education Agents

The online survey of education agent managers and owners sending international (non-EU) students to UK HEIs consisted of a mix of 36 quantitative and qualitative questions. It was designed to determine the models of education agents and the services they provide, and gain their perspectives on how the UK might better manage the industry to ensure the integrity of the international student recruitment market to UK HEIs. The survey was distributed through UK HEIs, the British Council, UKCISA membership, and through Sannam S4<sup>2</sup> contacts, Independent Higher Education<sup>3</sup>.



**305**  
education agent respondents



**57%**  
represent more than  
30 HEIs in the UK



Most have both **online**  
and **physical**  
presence



**76%**  
of the respondents had up to  
20 student-facing company offices



**81%**  
send up to 500 international  
students to the UK per year



**Over 50 countries**  
covered, with 64% operating  
in one country only

#### Top 10 Country Locations of Education Agency Respondents

India	23%	Pakistan	10%
UK	16%	Vietnam	9%
China	14%	Thailand	9%
Nigeria	13%	Nepal	7%
Malaysia	10%	Taiwan	7%

Note: 9% also mentioned having a presence in at least one European country

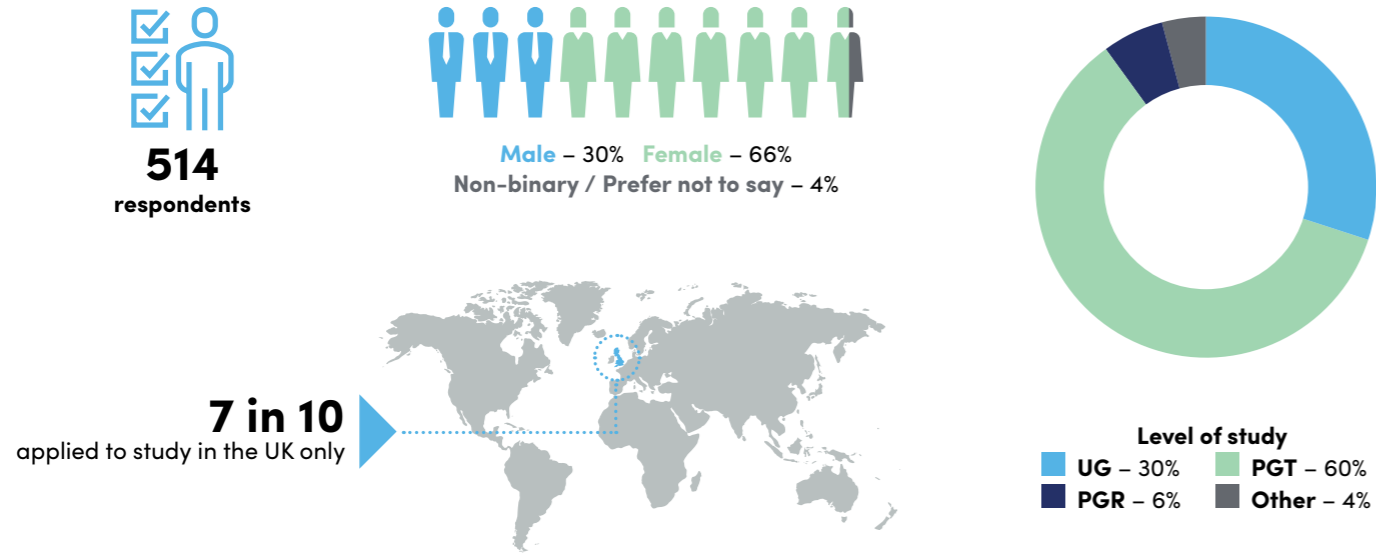
These are broadly representative of the largest source markets for international students coming through education agents to study in the UK.

<sup>2</sup> <https://sannams4.com/>

<sup>3</sup> <http://independentthe.com/>

### Online Survey of International Students

The online survey of international students consisted of 31 quantitative and qualitative questions designed to determine why students choose or choose not to use education agents. For those who did use an education agent, the survey further explored the services they accessed, their satisfaction with the services and their understanding of their education agent's relationship with the UK HEI. The survey was distributed by UK HEIs and UKCISA.

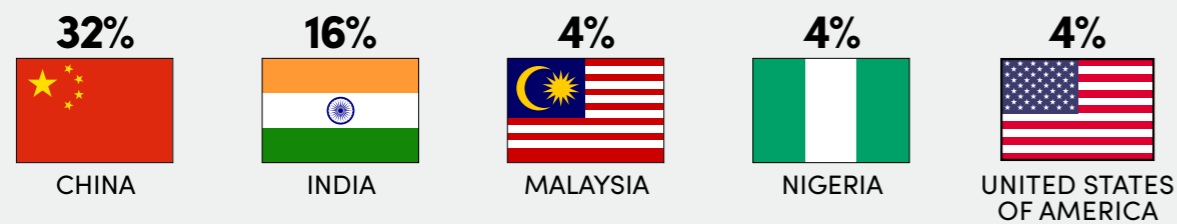


#### Student Location of Study

Scotland	25%	England – East	1%
England – Yorkshire and the Humber	24%	England – East Midlands	1%
Wales	23%	England – North East	1%
England – South East	13%	England – South West	1%
England – West Midlands	8%	Northern Ireland	0%
England – Greater London	2%	Other	1%
England – North West	1%		

READER NOTE: the percentages in some of the presented tables and charts exceed 100% due to rounding numbers.

#### Top 5 Countries of Origin



### Sector Stakeholder Interviews

The Research Control Group identified a number of stakeholders whose views were considered important to the integrity of the project. These stakeholders were interviewed through one-hour-long video conferencing sessions. The objective of these interviews was to understand the breadth of perspectives in the sector and government on education agents and how they are managed, and to garner ideas on how quality can be maintained or might be improved.



### HEI Staff Interviews

Based on responses from the education agent survey to a question asking to identify the best HEIs at managing education agent relationships, a number of HEIs covering different regions and institution types were interviewed to better understand good provider practice in managing education agents (see section 3.3) and build on the knowledge acquired from the online surveys.

### International Student Focus Groups

Four focus groups of up to five students each were conducted with students who responded to the student survey, chosen at random. Of these focus groups, three were with students who had used an education agent and one was with a group who had not. The purpose of these focus groups was to better understand how the students came to choose their university/course, the issues they encountered along the way and how the education agent and HEI helped them overcome obstacles. The focus groups were also used to determine how well understood the financial arrangements between universities and education agents are understood by future students and their views on these arrangements.

## Part Two: The Models, Functions and Compensation of Education Agents, and the Operating Environment

In 2013/14, a Times Higher Education survey found that 139 of 158 (88%) HEIs in the UK used education agents to recruit international students; the 19 that didn't were elite or specialist institutions. However, the role, functions and compensation of education agents remains unclear to many outside and inside the sector. Part Two of this paper clarifies these points and expands on understandings of the operational environment education agents work within.

### 2.1 DEFINITION OF AN EDUCATION AGENT

The research focused on education agents involved in the recruitment of international students to UK HEIs, and as such, these education agents are sometimes referred to as international student recruitment agents. Many UK providers have replaced the word agents with 'representatives' however, others use representatives to describe contracted staff based in a specific market. Education agent is still the most globally understood term in the international education sector. UK education agents highlighted they would like 'partnership' to be more commonly used in describing the relationship between them and their contracting providers. Edified borrows from the British Council, the Home Office (UK) and Australian Government language to define education agent partners:



A person or organisation that recruits international students and refers them to education providers. They are not employed by the provider, but are private entities contracted to deliver a range of services to potential students and the provider.

To a student, these services would ordinarily include education counselling, such as course and institution matching, and assistance with academic and visa applications.

To a provider, services usually include marketing and promotion services and support in identifying qualified students.

#### Core Education Agent Services

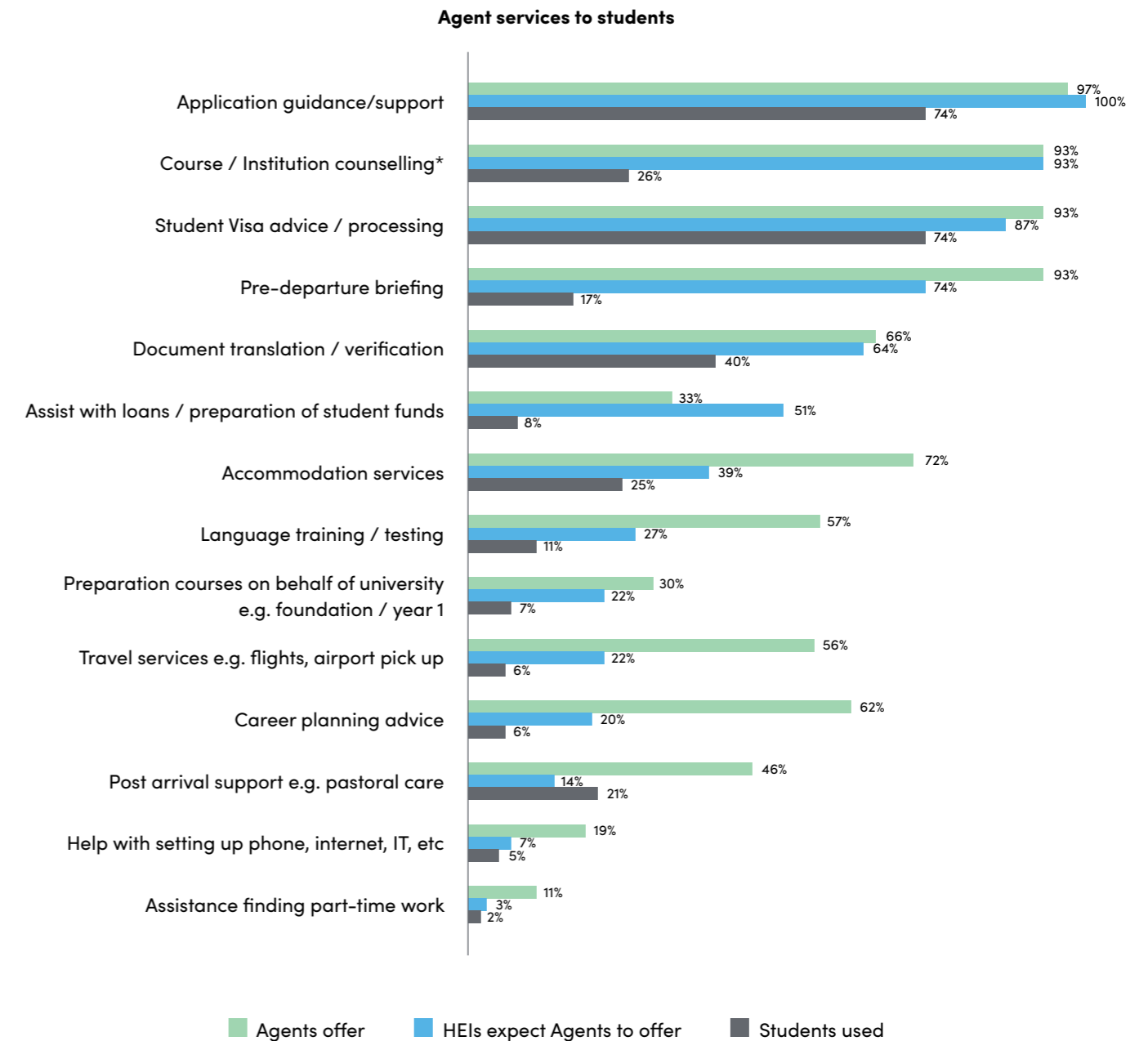
To the contracting HEI:

- Raise awareness of UK higher education through marketing, events, fairs, etc.(additional fees may apply)
- Provide institutions with market intelligence and trends
- Assist with local arrangements for travelling staff (additional fees may apply)
- Improve application quality (in relation to completeness and the applicant's academic and financial suitability)
- Increase student numbers from a given market or set of courses

To student (and/or family), on behalf of the HEI:

- Match student needs with universities and courses
- Help students navigate university application processes and entrance requirements
- Assist with document translation and verification
- Assist with preparing student visa applications

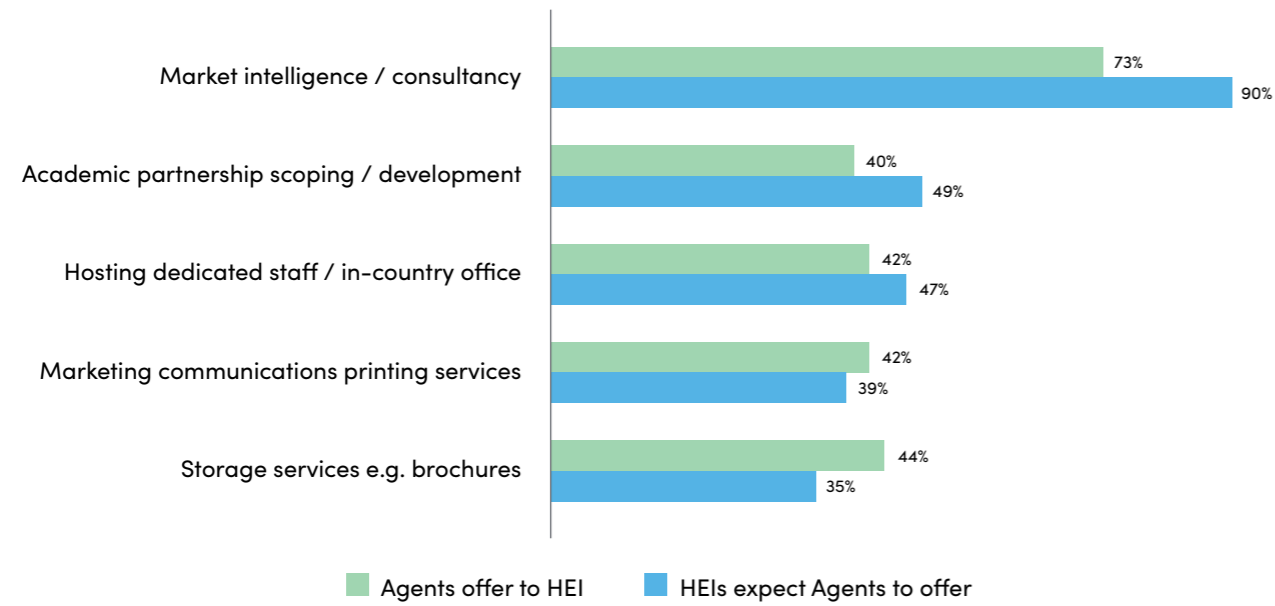
The core education agent services to students also serve the needs of HEIs, who, because of the education agent taking on this role, can direct their resources to other areas and/or students requiring direct assistance.



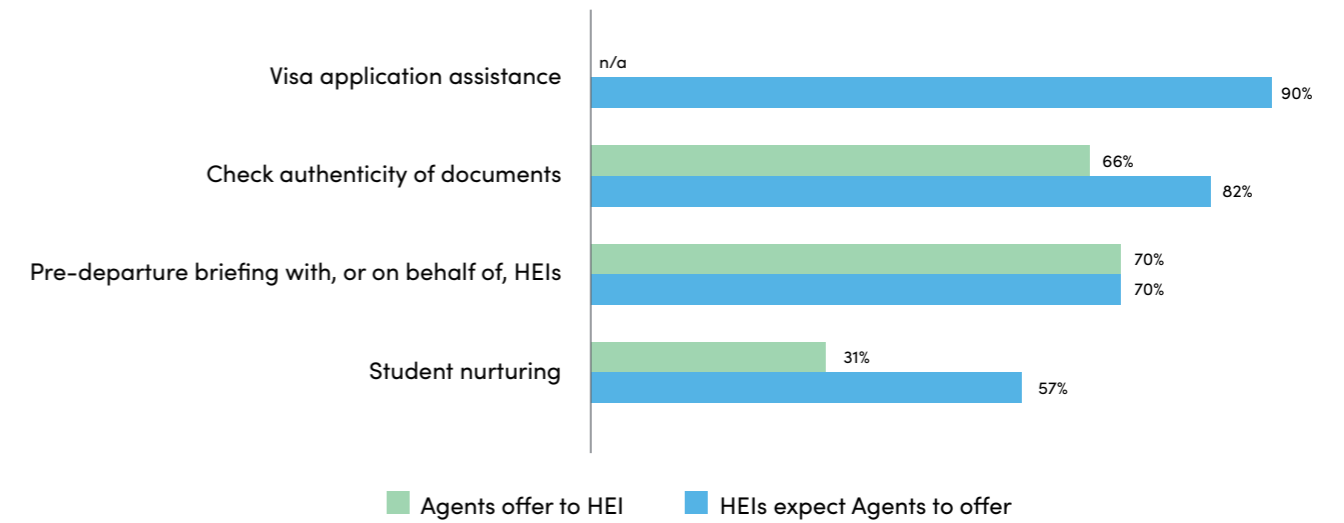


Based on discussions with international students, they believe the 'counselling' component is part of the guidance, support and advice provided by the agent, hence the lower mention by students.

### Agent support services to HEIs

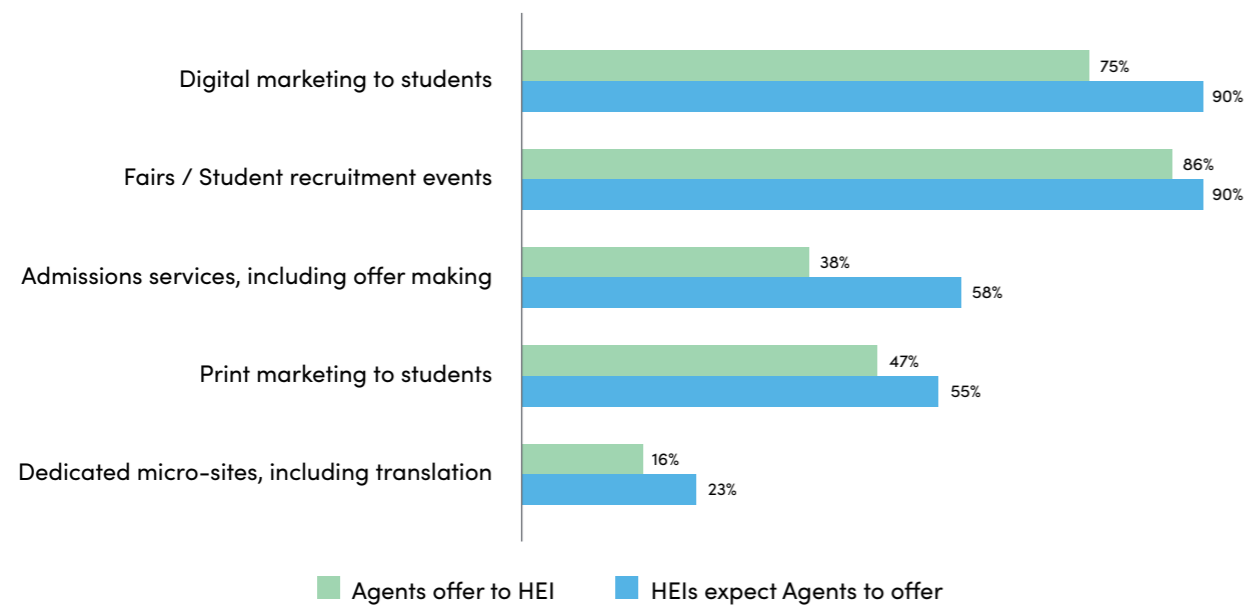


### Agent Support Services to HEIs: Student or Compliance Services



NOTE: the 'n/a' is used because visa services are not offered by education agents to HEIs.

### Agent Support Services to HEIs: Marketing and Recruitment



The survey results indicate that nearly all (97%) of education agents are paid a fee or 'commission', generally a percentage for the first year's tuition fees, once a student has enrolled and paid their first year's tuition fees at the contracting HEI. The nature of this commission and the terms of payment are outlined in the HEI's education agent contract and may be a flat rate or on a sliding scale.

### Ancillary Education Agent Services

In addition to the core education agent services, most education agents provide ancillary services (as illustrated in the graphs) to both HEIs and students (and their families). Although take-up is lower than that of core services, ancillary services can provide essential support services for specific students (for example, based on the research, Chinese students are more likely to use document translation/verification services or accommodation booking services). Depending on the regulatory environment of the source market in which the education agent is operating, the education agent's own policies, and/or the HEI's conditions stipulated in the education agent contract, these services may be provided under specific conditions, for example:

- on a fee-for-service basis and subject to independent agreements
- subject to additional terms or an addendum to the education agent contract
- agreed to under a contract (verbal or otherwise) between the education agent and the student

Contract arrangements are looked at in more detail in section 3.3.

## 2.2 HOW ENGAGING AN EDUCATION AGENT USUALLY WORKS

An education agent's service provision can be likened to that of a travel agent: a person with some knowledge seeks a professional with deep knowledge to help them identify the most suitable package for their needs.



**INTERNATIONAL STUDENT (AND FAMILY)**

Want the best higher education for their child – little expertise



**EDUCATION AGENT**

Wants to match the family with the best-fit HEI for them – lots of expertise



**TRAVELLERS**

Want the best holiday for them – little expertise



**TRAVEL AGENT**

Wants to match the travellers with the best-fit holiday package for them – lots of experience

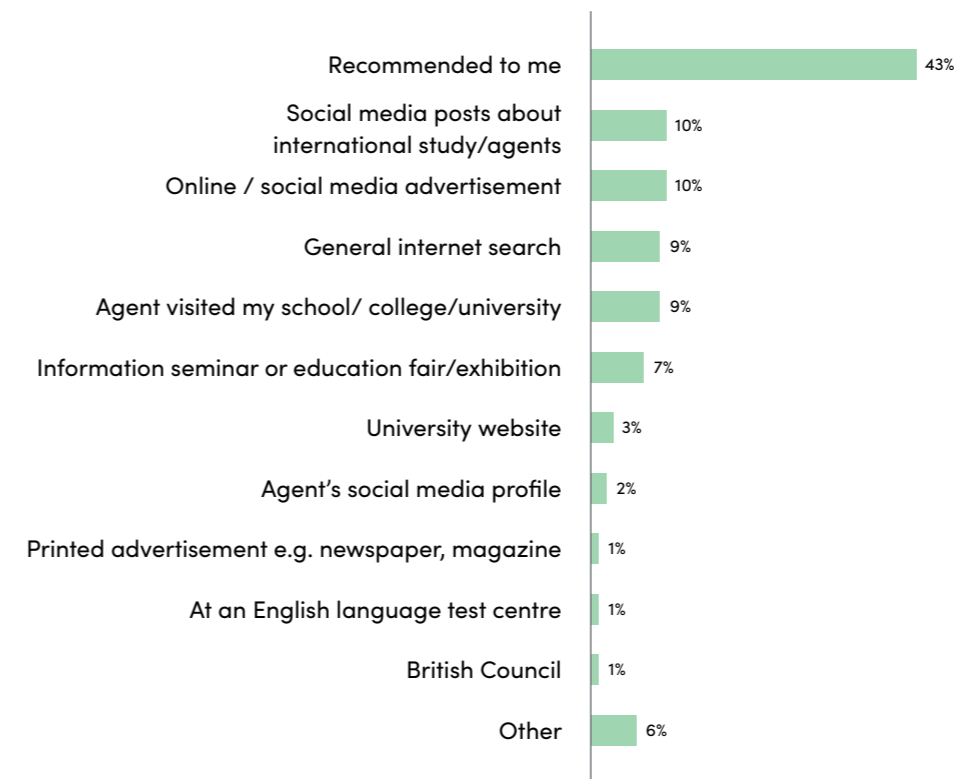


In both cases, the agent is looking for the best-fit, but the best-fit is not always what the client had hoped for. The education agent plays an important role in finding the right HEI and course to match the student's budget, academic ability and social fit; not every student will get into Oxbridge, so managing expectations is a key part of the job.

In addition to this matching/counselling role and determining whether the student is a good candidate for a UK student visa grant, the education agent is engaged by the student/family to help with both admissions and visa application processes, both of which can be complex and difficult for students, particularly those working in a second language. The education agent is contracted by the HEI but may also have a contract with the student regarding the services they will provide.

As with travel agents, students may find education agents by seeing advertisements, conducting internet searches or simply walking into a high street office, but in most cases students are led to a particular agent through personal recommendations and are therefore highly invested in providing students with a good service.

### How did you first become aware of your education agent?



Base: Students who used an education agent, n=329

"I did research myself but there were so many unis and courses, I didn't know what to do. My friend introduced me to an agent he had used."

**POSTGRADUATE TAUGHT STUDENT FROM VIETNAM**



## 2.3 TIMING AND DELIVERY OF EDUCATION AGENT SERVICES

The student journey below illustrates the different services delivered by education agents to the student and the contracting HEI through an average international student recruitment life cycle. The duration of this life cycle can vary considerably by student's country of origin and their desired study level, but it is widely accepted by HEIs that the majority of students fall into a 12–18 month process from enquiry to enrolment, which means changes to policy or activity can take more than 18 months to have an impact. As previously mentioned, many of the services provided to students, such as student counselling, assistance with the application, translation services, visa advice and pre-departure briefings, are also services to HEIs, allowing the HEIs to prioritise resourcing to other areas or prospective students who are applying to them directly.

### Average timeline of 18 months



#### Service to student

- Promotion raising awareness of UK education options
- Support with identifying English language requirements & options – in-country / in-UK

- Career planning advice
- Filtering: academic matching / financial matching / location matching / university matching
- Language training & testing (some in-house)
- Arranging visits to UK universities

- Help with collecting, verifying and translating documents
- Help submitting complete applications Direct / UCAS & options – in-country / in-UK
- Liaising with university to provide any missing documents
- Liaising with university to get offers, visa letters, etc

- Help Completing forms (e.g. CAS Statement and collecting required supporting documents)
- Help student prepare for visa interviews
- Help getting a passport
- Pre-departure briefings
- Identifying accommodation and help booking
- Help with travel bookings and insurance
- Assistance with local regulatory environment, e.g. meeting requirements of/registering with Ministry of Education
- Assisting with U18 guardian preparation
- Assistance with Scholarship / financial aid / bank loan applications

- Checking arrivals and liaising with parents/guardians
- Some ongoing pastoral support
- Assisting with finding part-time work
- Help setting up phone, IT etc

#### Service to institution



- Local marketing campaign – local media / digital channels. Translated
- Local printing and storage of materials
- Fairs and events
- Marketing reach – student nationality / regional diversity
- Promoting universities beyond London, Oxbridge and Edinburgh
- Market intelligence and consultancy
- Arranging visits to Schools / Colleges / Potential partners

- Brochure distribution
- Counselling student in-person – course knowledge + previous students
- Document verification
- Funding / ability to pay and support oneself
- Running counselling and interview days for university staff
- Travel arrangements for visiting staff
- Helping travelling staff in difficult situations
- Facilitating visiting and short programs

- Submission of complete application (less chasing of missing documents)
- Submission of verified translated documents
- Nurturing students and their family members
- Some agents do basic admissions work on behalf of universities

- Selling accommodation and other options
- Delivery of pre-departure briefings and preparation courses
- Some delivery of language /short courses on behalf of universities

- Maintaining contact with parents and guardians – important when there are critical incidents
- Assistance with alumni events

The research looked at pre-COVID services, but there has been significant sectoral feedback that education agents have provided vital student (and family) support during this complex time. In particular, assisting HEIs with communicating government and institutional policy changes and processes.

## 2.4 EDUCATION AGENT SERVICE VALUE AND QUALITY

The findings of the surveys of HEI staff and students illustrate the value placed on education agent services through the international student recruitment life cycle. Underpinning this is the importance of providing accurate and up-to-date information about studying in the UK – which most agents do, according to students and HEI staff.



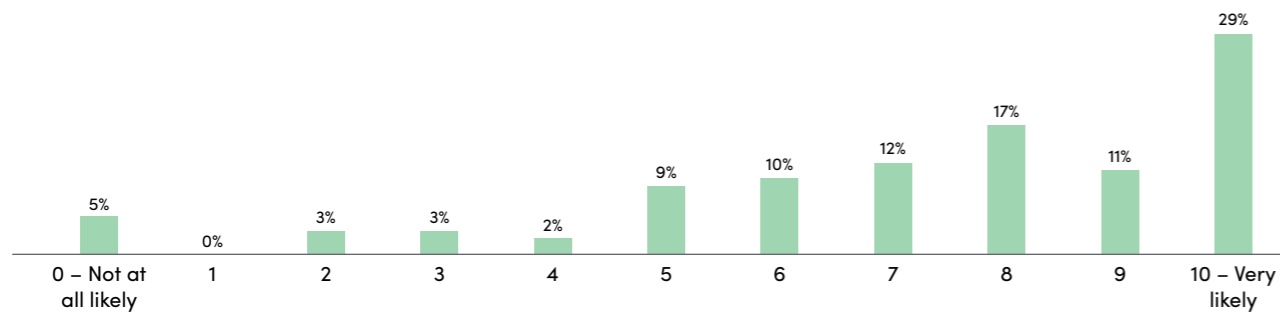
**85% of HEI**  
agree 'agents are well informed  
and up-to-date on the higher  
education sector in the UK'



**85% of students**  
who used an agent agree  
'the information provided by  
my agent was accurate'

Given recommendation plays a major role in student awareness and choice of education agent, it was the key metric used to evaluate agent performance among students. Two-thirds of students who used an education agent would be 'likely' (rating 7 or more out of 10) to recommend their agent, with 29% rating 'very likely' (10 out of 10).

How likely would you be to recommend your education agent?



Base: Students who used an education agent, n=329

When asked reasons for their rating, there were a range of delight moments as well as areas of concern. These were further explored in the focus groups.

For many, education agents are an essential part of a student's journey, providing support, guidance and advice from the first interaction until after arriving in the UK. The free service is also appealing for many students, given the high investment they (and/or their families) are already making to study in the UK.

"They made the process very easy and it was free of charge. The agent was very helpful, answered all my queries and assisted me through the whole process. I wouldn't have been here, without their help!"

POSTGRADUATE TAUGHT  
STUDENT FROM INDIA



"They were both free and very helpful in simplifying the very complex process. I may not have even made it as far as attending in the UK if I had not had their guidance and advice."

POSTGRADUATE TAUGHT  
STUDENT FROM THE USA



For those least likely to recommend their agent (13% rating 0-4 out of 10), key reasons they gave included lack of professionalism, incorrect information, application errors, slow response (this can be a result of the HEI's response time), expensive and the agent not being focused on students' needs. For a small number of students, they ended up applying on their own or, in the worst case missing their intended semester start, as one student mentioned.

"Their mistakes made me miss the first-year application, and I had to push it to the second year."

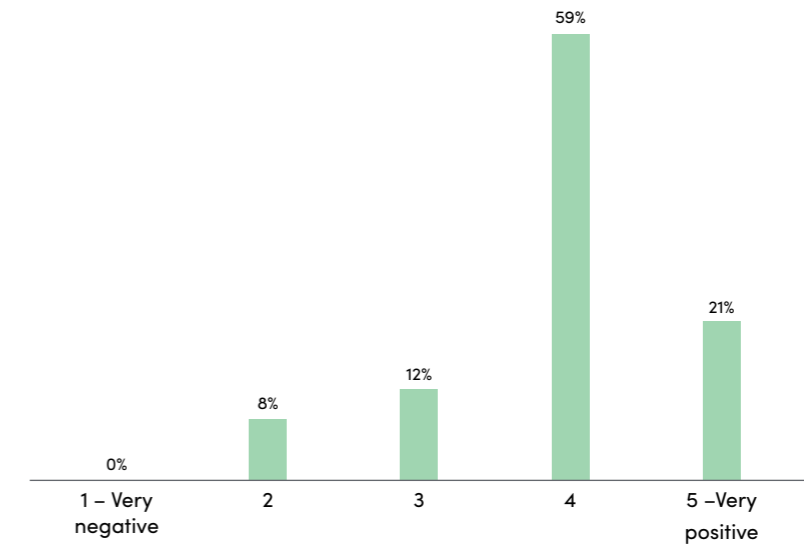
POSTGRADUATE TAUGHT STUDENT FROM CHINA



It was not possible to verify that the education agents used in these examples were contracted education agents of the desired provider. Nor is it possible to determine how much the students' own actions or situation caused complications in the process.

HEI staff sentiment towards education agents representing UK HEIs was positive, with 8 in 10 rating 'positive' or 'very positive'. Nearly all (93%) agree that education agents are essential to the success of international education in the UK and integral to their provider student recruitment strategy.

Overall, how do you feel about education agents representing UK HEIs in general?



Base: Students who used an education agent, n=329

"Without agents it would be very difficult to convert and get students to the UK. There are so many steps in applying to a university overseas and the agents can help answer questions saving reps a lot of time."

UK HEI INTERNATIONAL STAFF



Around 7% of students who used an education agent and 12% who did not, questioned the trustworthiness of the education agents.



#### FINDING

Trust is integral to the HEI-agent-student relationship. An agent must be professional, providing correct and timely information and advice to both the student and the HEI. Student perceptions of an education agent are driven by the education agents' ability to understand their needs and support or guide them in achieving their dream, i.e. getting into the best-fit HEI. In turn, a right outcome for the student should be mutually beneficial to the HEI.

Part Three of this report describes the education agent quality assurance framework in the UK. It also explores the approaches used in competitor destination countries to minimise the risks of a poor student experience or provider experience of using an education agent (noting that section 2.4 has already illustrated that the majority of both students and provider staff have reported positive experiences).

## 2.5 AGENT MODELS / CASE STUDIES

The majority of education agents working for UK HEIs can be categorised into six persona types, five of which are fairly distinct, and the sixth which usually falls within the Sole Trader or SME (Small and Medium Sized Enterprise) persona. These personas were identified through analysis of the online agent survey results.



### THE SOLE TRADER – 20% of agents

These tend to be small community or family-run entities that rely heavily on local trade and word of mouth. They generally do not have sophisticated systems in place but do provide a highly personalised service. Some of these smaller agencies may work as sub-agents to Market Specialists, Multinationals and Education Giants (other identified personas) (see section 2.9.5 for more information on sub-agents).

#### Examples



**Key attributes:** Community-based / Strong local links / Personal service / Limited resources / Small turnover / Family-run

- Majority less than 10 staff, 50% just one person
- Usually recruit less than 40 students a year

## THE SME – 60% of agents

The engine room of the industry, with 60% of education agents falling into this persona, SMEs offer the broadest range of operational models (see also The Specialist/Innovator/Online). There have been cases of the demergers of Market Specialists to form two or more SMEs. Some of these mid-sized agencies may work as sub-agents to Market Specialists, Multinationals and Education Giants.

### Examples



**Key attributes:** Experts in their field / Local knowledge / Hard-working / Collaborative / Backbone of the industry / Protective of their reputation / Very little influence individually

- Recruit a moderate amount of students per year (20-200)
- Represent a moderate number of UK HEIs (10-80)
- Employ a moderate amount of employees (6-50)
- Multiple offices, generally just in one country

## THE MARKET SPECIALIST – 5% of agents

These well-systematised organisations tend to have a large geographic coverage and brand presence within a single country or region. For many agents, this is a transitory phase as they move towards becoming a Multinational, but there are a group who have remained in this category for some time. The fully-owned offices model is the most common in this category, but several education agents have used franchising as a model to test new locations before bringing offices in-house. Mergers and acquisitions have also pushed some SMEs into this category.

### Examples



**Key attributes:** Product expertise / Regional adaptations / Joined-up systems / Consistent standards / Well recognised brand domestically / Very little international presence

- Operate exclusively in one country or region
- Recruit over 1,000 students per year
- Represent over 80 UK HEIs
- Operate with a large staff base (91% have more than 50 staff)
- Multiple offices in different towns and cities



## THE MULTI-NATIONAL – 10% of agents

These organisations maintain a lot of similarities to the Market Specialist, but have moved their operations beyond their original setting and into new markets. Often this involves expansion within their region, but some have strategically invested in growing recruitment markets either through setting up direct offices or through the acquisition and rebranding of existing SME education agents (and, on occasion, Market Specialist education agents) in those markets.

### Examples



**Key attributes:** Global presence / Regional expertise and adaptations / Strong brand / Key industry player / Large customer base / Hi-tech systems / Internal regulation and standards

- Operates in three or more countries
- Recruits over 1,000 students per year
- Represents over 100 UK HEIs
- Operates with a large staff base (majority have more than 50 staff)
- Multiple offices across different countries (20+ offices)

However, as with any categorisation, there are some education agents who sit on the peripheries of the personas, or fall within them but have some unique characteristics.

## THE SPECIALIST/INNOVATOR/ONLINE

The Specialist/Innovator/Online category comprises education agents who generally fall into the Sole Trader or SME personas, but that exhibit unique characteristics – such as, they specialise in a particular discipline area or only recruit for certain types of HEIs.

Another sub-group is the online education agent, which does not use a walk-in office space, but has applied digital tools and platforms of varying sophistication to deliver core education agent services. In some cases these online education agents have developed a B2B model where they manage a large number of sub-agents through their online platform. There are also an increasing number of education agents embedded in schools and HEIs.

### Examples



**Key attributes:** Sometimes fully online or perhaps only recruiting to certain disciplines such as Fine Arts / Tend to be sole-traders or SMEs in scale / Provide specific services to specialism e.g. portfolio assistance

## THE EDUCATION GIANT

This category describes education companies that have an education agency arm as a small part of a much larger entity, often purchased as part of the reverse integration of their supply chain.

### Examples



**Key attributes:** Huge multinational organisations / many different arms of the business / massive customer base / industry influencers / breaking new ground

IDP Education borders this category but as the education agent part of their business is externally perceived as their core function, they fall into the Multinational persona.

### FINDING

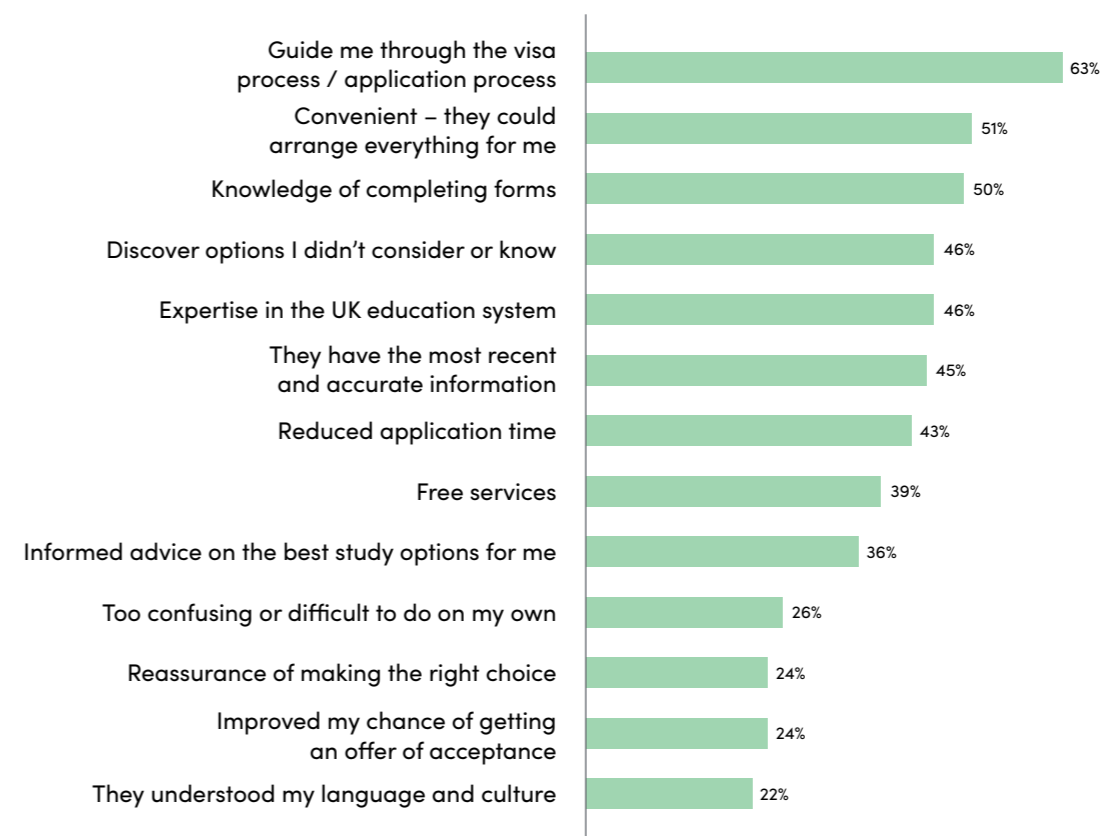
Education agencies operate under many different business models and can range from one person operations to companies listed on international stock exchanges – recommendations will need to take into account this diversity.

## 2.6 WHY DO STUDENTS USE EDUCATION AGENTS?

While the services provided to students have been outlined earlier in this section, the reasons students (and their families) use an education agent have not been detailed beyond a basic premise that the student has some knowledge but is looking for an 'expert' to provide more detailed knowledge and assistance (see section 2.2).

The survey of international students found that the main advantage of using an education agent is that they provide guidance for the application and visa processes, which can otherwise be overwhelming or confusing for many students and their families who are doing this for the first (and probably only) time. The expertise of an education agent opens up a range of other benefits too, including convenience, alternative HEI options and reduced application times.

### What were the main benefits of using an education agent? Select all that apply



Base: Students who used an education agent, n=329

"They helped throughout the process and sometimes it can be so confusing when applying to university, just having someone that's willing to help out and advise you is extremely helpful."

UNDERGRADUATE STUDENT FROM NIGERIA



### FINDING

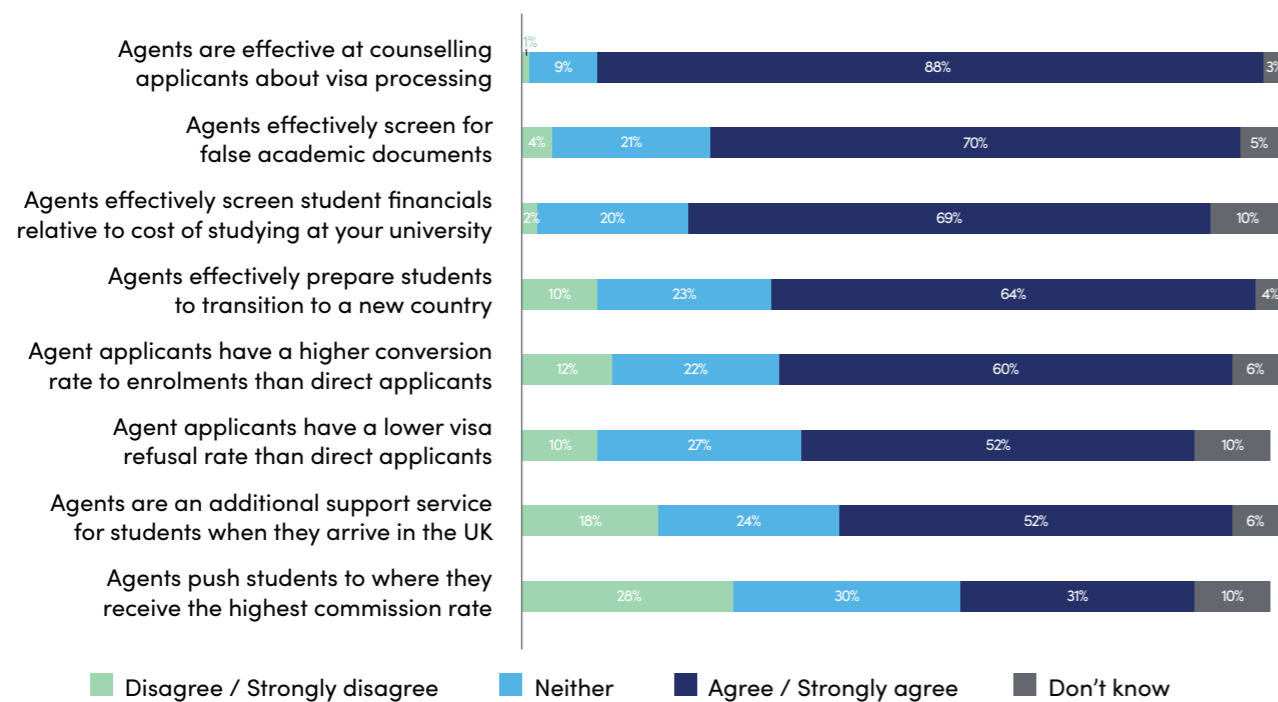
Education agents are an influential part of the wider student visa process. A robust and well-informed quality assurance framework will further support the existing Home Office practices.



## 2.7 WHY DO UK HEIS USE EDUCATION AGENTS?

Our survey of staff in HEIs suggests education agents are cost-effective and play an important role in managing the governance of student requirements for HEIs, while providing appropriate support and advice for students and their families.

Statements regarding education agents: Level of agree or disagree



Base: All HEI respondents, n=105

“Typically agents represent the diverse range of UK HEIs in a wide range of markets effectively and successfully, with legitimacy.”

HEI STAFF

“It’s so hard to generalise as quality and motivation in agents varies widely from market to market and even within the same market, some agents operate with more of a commercial interest than others.”

HEI STAFF

“Recruitment would be halved to my university without use of agents. They are necessary although I have concerns that not all have high standards.”

HEI STAFF

Education agents report that academically matching students to courses / university is the most important factor for their UK HEI partners. While the majority of agents believe ‘student matching’ is the priority for most UK HEI, some agents report a variation by institution depending on institution ranking and recruitment priorities such as region, scholarship, faculty or intake period. Some of the smaller and regionally located HEIs use education agents to help raise awareness of study opportunities outside of the major UK cities.

### FINDING

Education agents can play an important role in raising awareness of providers in more remote locations or with lower brand recognition overseas, so spreading the benefits of providers hosting international students across the UK.

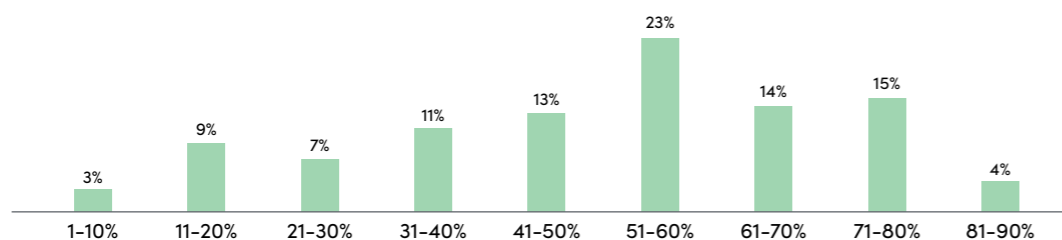




## 2.8 THE EDUCATION AGENT MARKET FOR THE UK

In 2018/19, the UK welcomed 203,890<sup>4</sup> international non-EU students to study at UK HEIs. It is difficult to ascertain an exact figure for the number of these students who used the services of an education agent, but based on the 91 HEI staff holding an international recruitment role who responded to the survey, the figure is in the 45–55% range.

Approximately what proportion of international students are placed via an agent?



Base: All HEI international role respondents, n=91

About 80% of education agents representing UK HEIs surveyed, also represent HEI in other study competitor destination countries, notably Australia, Canada and the USA. Compared to the competitor destinations measured, 74% of agents report placing the highest of number of students to the UK.

### FINDING

Education agents are an international student recruitment channel used globally and there is competition for their students. UK providers need to continue to embrace a diverse range of channels, but it is clear education agents form an incredibly important part of the mix.

### Value of Agents to the UK Economy

In addition to the difficulty of determining an exact figure for the number of students who used an education agent, it is also difficult to determine the value education agents bring to the UK; however, using data from HEPI<sup>5</sup> and HESA<sup>6</sup> reports, and applying the 45–55% range, we can put figures to the value.

The HEPI report calculated that in 2015/16, a non-EU international commencing student contributed £108,000 to the UK economy through the course of their studies; this figure includes all contributions, not just tuition fees. Adjusted for inflation and assuming all universities increased their tuition fees by inflation and that all living costs (e.g. accommodation, food, etc.) rose by the same, a student enrolling in 2018/19 would be expected to individually contribute approximately £116,500. HESA reported 203,890 newly commencing international non-EU students in 2018/19, so education agents are estimated to have contributed between £10.6 and £13.1 billion to the UK economy.

(total students x % through agents) x individual contribution  
= agent contribution to UK economy

Bottom of range: (203,890 x 45%) x £116,500 = £10,688,933,250

Top of range: (203,890 x 55%) x £116,500 = £13,064,251,750

“Education agents contribute approximately £11.88 billion to the UK economy each year.”

### FINDING

Education agents play a significant role in generating income to the UK economy without which, some providers and the surrounding local economies may struggle.

<sup>4</sup> <https://www.hesa.ac.uk/news/16-01-2020/sb255-higher-education-student-statistics/location>

<sup>5</sup> <https://www.hepi.ac.uk/wp-content/uploads/2018/01/Economic-benefits-of-international-students-by-constituency-Final-11-01-2018.pdf>

<sup>6</sup> <https://www.hesa.ac.uk/news/16-01-2020/sb255-higher-education-student-statistics/location>

## 2.9 AREAS OF CONCERN / OPPORTUNITIES FOR IMPROVEMENT

While the benefits of using education agents are plentiful and have previously been identified, analysis of the surveys and the input from stakeholders have highlighted areas of concern, particularly in relation to a lack of transparency in ‘education agent to HEI’ and ‘education agent to education agent’ arrangements.

Of concern to stakeholder bodies was the perception that students may be:

- Unclear about whether the education agent is an ‘official’ representative of the HEI they want to attend
- Unaware that an education agent is being paid a commission by an institution to deliver the core education agent services
- Paying for core education agent services on top of the HEI’s paid commission
- Being pushed towards HEIs paying larger commissions without due consideration for students’ needs/desires
- Deferred or misinformed by the aggressive marketing tactics of some education agents to entice prospective students to use their services, sometimes after having engaged a different education agent

Of concern to HEIs and some education agents is the role of sub-agents and the negative impact they can have on both the HEI and education agents in general. Most HEIs (61%) agree to the use of sub-agents if the contracted agent has HEI consent, but over half are concerned about their lack of direct control over sub-agents.

### FINDING

A sub-agent can increase a provider or agent’s reach, but there is a need for an open approach that allows greater transparency of, and training for sub-agents to minimise the risks.

Many HEIs cited the risks associated with contracting an education agent to their brand, but most felt that these types of risks could be mitigated through training and agent management practices (see Part Three: The Education Agent Partner Quality Assurance Framework).

### 2.9.1 WHICH EDUCATION AGENT REPRESENTS WHICH HEI

While the majority of HEIs publish lists of their contracted education agents on their websites, they do it largely for marketing rather than compliance purposes. If a student searches a UK HEIs website, they will often be able to determine whether an education agent is an official representative of their desired HEI, or not. Principle 3 of the London Statement (see section 3.2.1), indicates that education agents should reciprocate this transparency.

The framework by which education agents are managed is looked at in greater detail in Part Three, as are the HEI requirements under the UK-based QAA’s Quality Code for Higher Education (see section 3.2.4).

### FINDING

The education agent quality assurance framework in the UK needs to improve the clarity of who works with whom to make it easier for students to make a fully informed decision about which education agent they should use.



### 2.9.2 STUDENT COMMISSION TRANSPARENCY

The student survey found that 45% of students agreed that their education agent was transparent about how they get paid by the HEI. When explored further in the student focus groups, most said they did not recall if their education agent discussed their revenue source, while others actively enquired about why the education agent's services were free. The student response was mixed regarding how important it is for education agents to be transparent in how they get paid. Some students didn't care, as long as the education agent could assist them in getting into the right university for them, while others said it was necessary to know these details to ensure there was no conflict of interest.

Irrespective of the student's satisfaction with the services provided, stakeholders highlighted this is an area of concern. The majority felt that while it may not be necessary to disclose the exact amount being paid, clarity that there is a commercial arrangement was more ethical and in line with other industries e.g. financial services, travel agencies, and letting and vehicle traders (a variety of approaches are used by these different groups). Furthermore, The London Statement, which is dealt with in more depth in section 3.2.1, calls for:

**“Transparency – declaring conflicts of interest to all clients, especially when service fees are charged to both the education provider and the prospective student.”**

#### FINDING

The education agent quality assurance framework in the UK should ensure that students are made aware of the commercial arrangements between contracted education agents and providers.

### 2.9.3 STUDENT PAID-FOR SERVICES

Some education agents, particularly those in China, were found to have charged students for most services (including some core), while others only charged for ancillary services such as document translation or arrival assistance (accommodation, airport pick-up, etc.). The majority of students surveyed who paid for services were Chinese (82%). Those who paid their agent for services were less likely to recommend their agent (50%) compared with those who didn't pay for education agent services (85%). Students who paid their education agent were less likely to believe their education agent was trustworthy and provided accurate information. This may be a result of student expectations when paying for a service. Nevertheless, it highlights the importance of education agents delivering a quality customer service experience, whether the paying customer is the student or the HEI.

#### FINDING

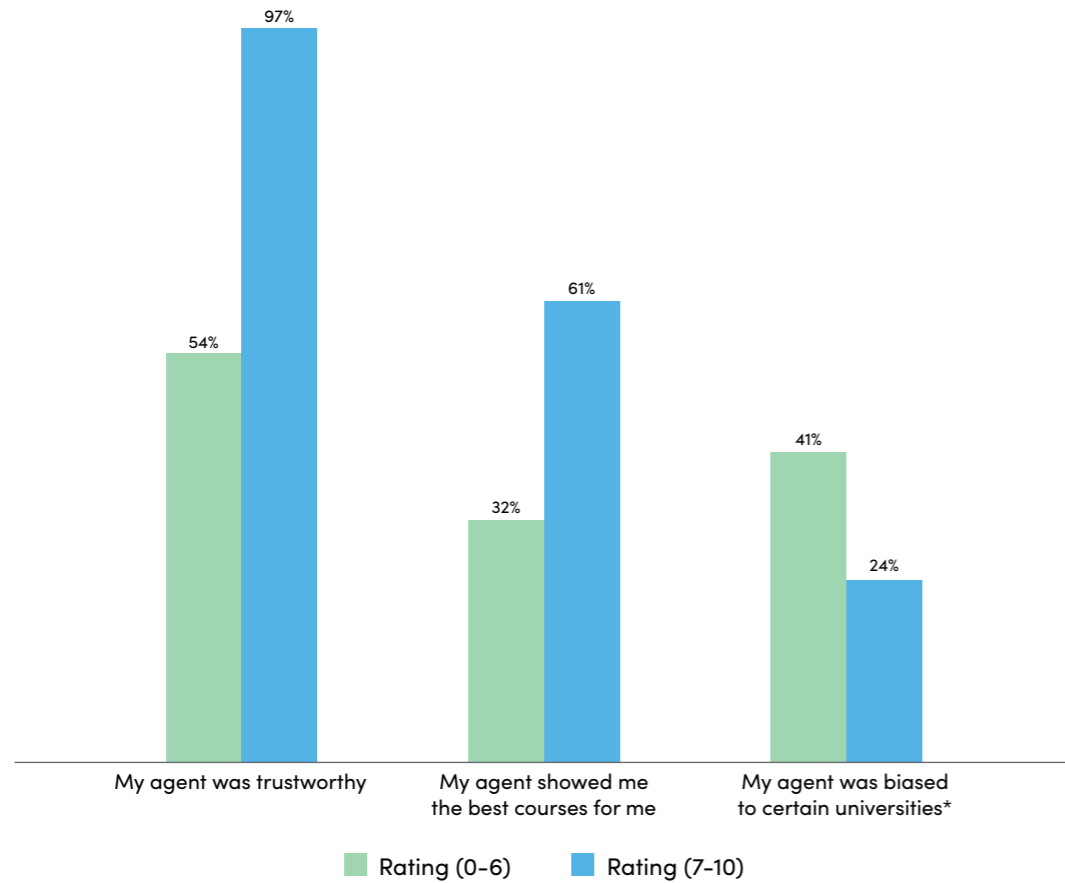
Transparency around what an education agent is being paid for by the provider will help students decide whether they wish to use a particular education agent.

### 2.9.4 COMMISSION DRIVING EDUCATION AGENT BEHAVIOUR

It is very difficult to get evidence supporting or disproving that some education agents may push students towards providers with higher commission rates. In reality the details of education agent contracts are rarely known by the student counsellors, rather are subject to negotiation between the HEI and the owner. Also, a larger rate of commission does not always result in greater financial return to the education agent with most HEI commission structures tied to fees.

The value of student referral to education agents is 33% greater than any other method of a student becoming aware of a particular education agent (see section 2.2) and is heavily tied to student satisfaction. According to the student survey this is achieved when the counsellor provides good, accurate and timely information to match the student with a course and HEI.

**Education agents: % of students who 'strongly agree/agree' with key factors by likelihood to recommend**



Base: Student respondents who did use an agent, n=329  
 \* Note: this is a negatively worded statement

The students' perceptions of the service and outcomes is the greatest driver of revenue for an education agent; the education agent survey results illustrated that this was well understood by education agents.

Despite this, anecdotal feedback from HEI staff highlighted some concerns around perceived overly commercial practices of education agents, such as promoting one institution over another for financial gain. This was not substantiated through this research, but this type of practice is already regulated by the Competitions and Markets Authority (see 3.1.7).

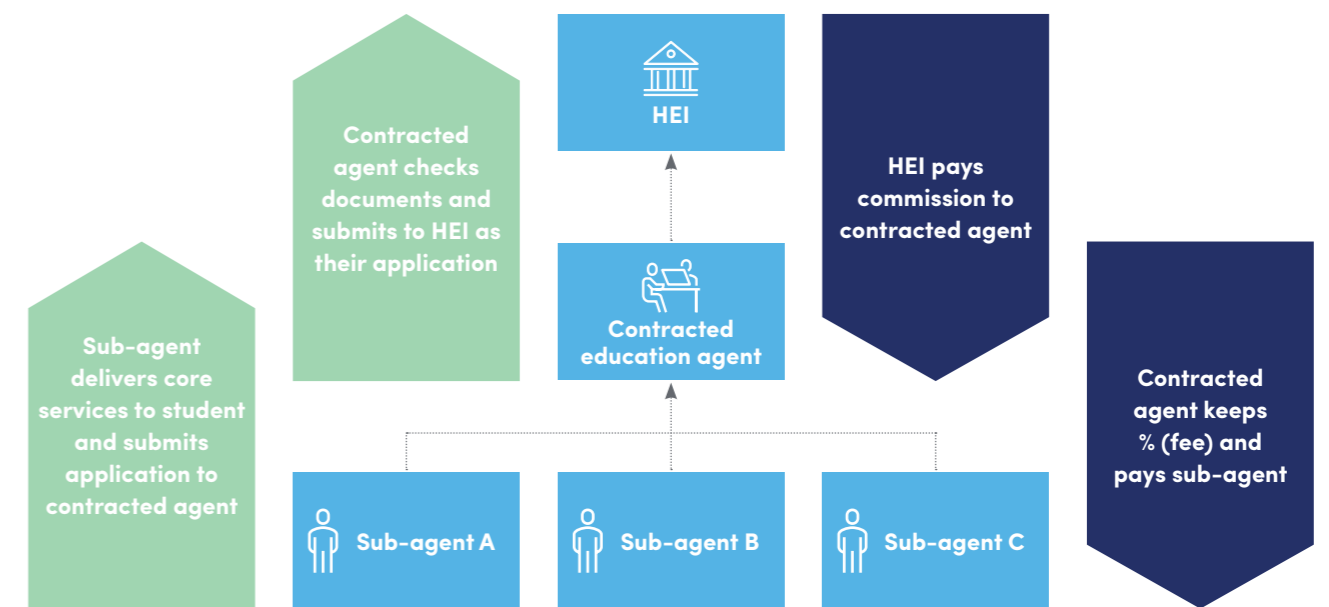
**FINDING**

The education agent training should incorporate the scope of the Competition and Markets Authority to help education agents understand the potential consequences of misadvising students. Furthermore, students need to be made aware of channels for feedback and complaints, should they feel they have been misinformed about a provider by their education agent.

**2.9.5 SUB-AGENTS**

The term 'sub-agent' is used in the international student recruitment sector to describe a relationship between two agencies where the sub-agent has a student who wants to go to a certain HEI that the sub-agent does not have a contract with. They route that students' application through a contracted education agent; the contracted agent essentially sub-contracts. Generally, any commission paid by the HEI is then split between the two agencies. Some of the larger agencies operate controlled sub-agency networks but maintain quality control through centralised teams, who assess the application and sometimes speak to the students to make sure they have been well counselled. These 'education agent to sub-agent' organisations are also known as 'B2B education agents'.

**Sub-agency Network Model**

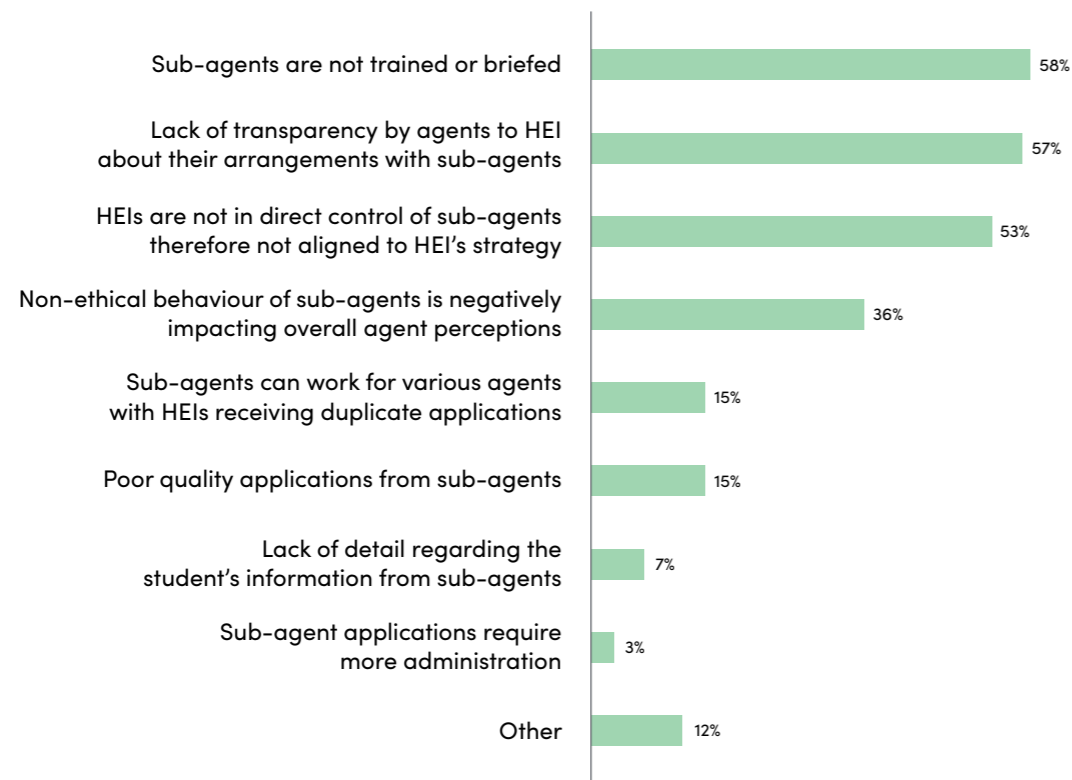


However, the sub-agents have been an area of concern for HEIs for some time (in the UK and overseas) and have led some HEIs to stipulate in their education agent contracts that:

- sub-agents are not permitted, and their use would be in violation of the contract
- sub-agents may be permitted by written agreement with the HEI

HEI staff worry that the sub-agent, who may not have been through the HEI's agent training, could misrepresent them to the student and the quality of services may be substandard. There is also concern that the student may be unaware that the education agent representing them to the HEIs might not be 'official' (see section 2.6.1) and that the student may be paying for services unnecessarily.

What do you believe are the main issues, if any, with the use of sub-agents? Select a maximum of 3 options.



Base: All HEI International staff respondents, n=91

The quality management of sub-agent arrangements is discussed further in section 3.3.

#### FINDING

The UK's education agent quality assurance framework should improve the clarity of who works with whom to make it easier for students to decide which education agents they should use. Providers can ensure they minimise their risk by including appropriate clauses in their contracts.

#### FINDING

The sub-agents network is unlikely to disappear and can provide UK providers with enhanced reach in the source markets, so recommendations must factor in improving the overall quality of student advice given by all education agents (contracted or otherwise) by making basic training accessible.

### 2.9.6 AGGRESSIVE MARKETING STRATEGIES

HEIs and other agents identified the issue of 'poaching students' whereby a student registers with an education agent, but a different education agent tries to get them to leave the first agent and apply through them. This sometimes happens after the application has been submitted. In more extreme cases, HEIs, particularly in larger urban areas, have reported cases of UK-based agents trying to recruit newly arriving students at the airport or outside campuses to try and redirect them so they can claim a commission. Since arriving in the UK, 29% of students surveyed said they'd been approached by other agents, mainly via digital channels. It should be noted that the survey did not make clear if this was poaching or marketing for higher level studies. Student poaching is ethically unacceptable but difficult to regulate. As a way of circumventing this problem, some HEIs use pre-departure and orientation activities to warn their prospective students about the potential negative implications to their student visas should they follow this path. It is difficult to determine the tipping point between supporting student choice and poaching activities.

Home Office and British Council staff have reported misleading marketing campaigns and banners in some markets that over-promise or mislead students, e.g. 'UK student visa – No IELTS required'. An IELTS is not the only acceptable English language qualification, but an education agent using this type of language is not only setting a false expectation for the student, they are also lowering the quality of the UK's brand identity.

It was not clear whether the education agents referred to were contracted by UK HEIs. This practice is already regulated by the Competition and Markets Authority (see section 3.1.7).

#### FINDING

A centralised resource for all UK-bound prospective students would help to shed light on this unethical practice and help students to make informed choices; this might be achieved through a modified list of British Council trained education agents (see section 3.2.2). An independent complaints procedure might help mitigate this aggressive practice, but is unlikely to remove it completely. Provider contract clauses can also help mitigate this type of behaviour, but it is important to ensure that any procedures do not impede on the student's right to change their mind if they are not happy with the service from their current agent.

### 2.9.7 FRAUDULENT DOCUMENTS

One of the education agent services HEI staff value is the verification of documents, with 70% agreeing that 'agents effectively screen for false academic documents' (see section 2.7). However one HEI staff reported that they had heard of an education agent that was found to have submitted fake documents to try and 'help' a student gain a place at an HEI, get bank loans to finance studies and/or get a visa. Most UK HEIs are members of the National Recognition Information Centre (UK NARIC) and have admissions staff trained to identify fake documents.

The use of documents generally constitutes a breach of contract and is grounds for termination but a number of HEIs did point out that they investigate these cases before making decisions, and often find that the students are at fault rather than the education agents.

"Worked with them [agents] for many years, strong relationships, increased marketing reach and marketing intel from them, good checking of student documents in high risk markets etc." – HEI STAFF

#### FINDING

The UK has effective processes in place to manage the very small risk of this occurring and have mechanisms to take action if required to do so. Trained education agents help to minimise this risk.

## 2.10 STUDENT SUGGESTIONS ON HOW EDUCATION AGENTS COULD IMPROVE THEIR SERVICES

Students, both users and non-users of agents, were asked how education agents could either improve their services or encourage students to use their services. The broad range of feedback centred on focusing on students' needs:

- Increase awareness of what education agents offer students and how they can help
- More transparency about the overall process
- Provide expertise and advice but allow students to make the decision
- Publish/share student placement success rates and stories

"Provide more facts about how students would experience things on the ground – so international students have a greater idea what experiences they will expect. So maybe sending out videos of past students who used the education agent and how they found the whole process and how studying in the UK is like."

**UNDERGRADUATE STUDENT  
FROM SOUTH AFRICA  
WHO USED AN AGENT**



"It is common for someone who is not familiar with the process to feel overwhelmed and therefore it is very important for education agents to be able to properly communicate with international students..."

**UNDERGRADUATE STUDENT  
FROM MALAYSIA  
WHO DIDN'T USE AN AGENT**



"Be more transparent in the process, give honest suggestions and do not make the decision for students."

**POSTGRADUATE  
TAUGHT STUDENT  
FROM CHINA WHO  
DIDN'T USE AN AGENT**



"Deeply understand the personality of a student and also what the student wants from the University they wish to go to."

**UNDERGRADUATE  
STUDENT FROM  
INDIA WHO DIDN'T  
USE AN AGENT**



## 2.11 THE IMPACT OF THE COVID-19 PANDEMIC ON EDUCATION AGENT MODELS AND FUNCTIONS, AND THE NEED FOR FUTURE RESEARCH VALIDATION

It is too early to be confident that the COVID-19 outbreak will result in lasting changes to the way education agents operate or the services they provide, or, indeed, what an education agent is. The significant drop in global student mobility in 2020 and local COVID-19 restrictions have led to many education agents rapidly adopting online counselling tools and virtual events, but these are not always practical or affordable for smaller organisations. Anecdotal feedback from HEIs suggest many education agents are struggling.

While the core services have remained fairly constant in type and delivery mode for many years, the sector is evolving and an increasing array of ancillary services are being offered by education agents to meet the needs of the market in which they operate, the needs of their student clients and the needs of HEIs themselves (see section 2.3). The traditional 'counsellor in an office offering the core services to students walking in' is also evolving with new online platforms. It remains to be seen if these technologies will replace or augment traditional practice, but it is likely this will depend on the technological adoption within the source market. The survey results show that there are some education agents that now operate entirely online and are even presenting themselves as ed-tech companies, with students and institutions using their 'platforms' to provide the services traditionally provided by the counsellor.

Since the original research was undertaken (2020), many HEI staff and some sectoral and government bodies have provided anecdotal feedback of education agents playing an even more important support role through COVID-19. This includes communicating new institutional and government protocols and supporting students navigate them.

While a degree is increasingly seen as a commodity, purchasing education is unlike purchasing many other expensive commodities which may be purchased multiple times across a lifetime. As such, the decision-making process is slightly different, but still benefits from empathetic counselling.

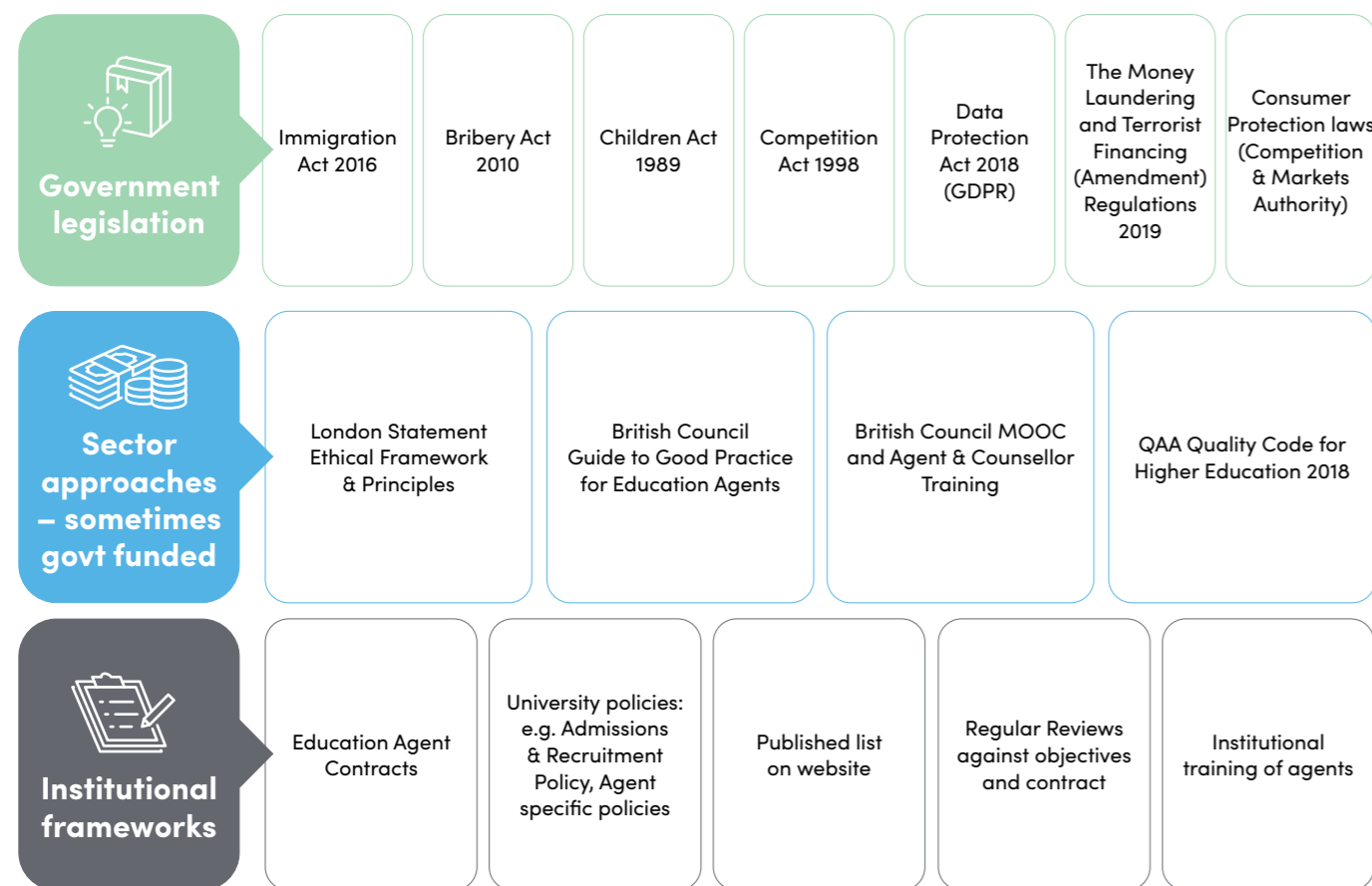
## Part Three: The Education Agent Quality Framework

This section looks at the way in which education agents and universities partner, the frameworks used to manage these relationships, the regulatory environment in the UK under which the relationships fall and how all of these factors compare with those of competitor destination countries – namely, Australia, Canada, France, New Zealand and the United States of America.

### The Education Agent Quality Framework in the UK

Less than half of respondents to the HEI survey agreed that the UK's existing procedures are effective in providing a quality framework for education agents, despite 90% reporting they have appropriate protocols in place for education agents, such as written agreements and regular training.

#### The UK's Current Education Agent Quality Framework



#### FINDING

Institutional contracts, training and other education agent management protocols are the primary tool in education agent quality management so it is important that this is done well across the sector (see section 3.3). Additional recommendations should complement institutional best practice.

## 3.1 GOVERNMENT LEGISLATION

Unlike some competitor markets (see section 3.4), in the UK there is no legislation that specifically references education agents as part of the international student experience pre-enrolment; the CMA does manage the applicant experience. However, like for all other industries, there are legislative instruments that international student recruitment practice must adhere to. It should be noted that there is some slight variation in legislation between the UK's devolved parliaments, but the relationship between public UK HEIs with education agents is usually covered across UK domains.

### 3.1.1 IMMIGRATION ACT 2016

This work was originally undertaken prior to the revisions to the student visa scheme in 2021. All international (non-EU) students require a visa to come and study in the UK. The type and duration of course dictates which visa category they will need to use, but the vast majority of higher education students fall within the 'General student visa (Tier 4)' category. UK HEIs apply for a 'Tier 4 sponsor licence' to sponsor international students to come and study at their institution. Tier 4 sponsors have defined assessment and reporting responsibilities that help to identify whether a student complies with the Tier 4: genuine student rule (pp. 101–3, 'Tier 4 of the points-based system' 2019). As stated in the document, the Home Office expects HEIs to consider whether they 'are satisfied that an applicant is a genuine student'. It goes on to identify a range of credibility factors that the HEI needs to appraise in the individual applicant's case, including their immigration history, their financial situation, their education history and post-study work plans, the role of dependents, any 'push-and-pull' factors and issues identified in relation to situations 'where the application is being managed by an agent about whom the Home Office has concerns' (p. 103, 'Tier 4 of the points-based system' 2019).

HEIs are not systematically provided with details of the education agents the Home Office have concerns about. The HEI remains the accountable entity, should there be some kind of compliance breach, but HEIs contract education agents to assist them with identifying qualified students (see section 2.7).

A compliance breach can result in punitive measures taken against the HEI by the Home Office, and subsequently against the education agent through their contract with the HEI. As such, education agents must have a good understanding of the immigration legislation as it relates to the Tier 4 categories and other areas of the Immigration Act 2016. This is demonstrated by the areas of immigration legislation covered by the British Council Agent and Counsellor Training Suite (see section 3.2.2):

Area of Immigration Legislation	British Council Training Level
<ul style="list-style-type: none"> <li>Introduction to visa requirements</li> </ul>	Assistant Level
<ul style="list-style-type: none"> <li>International students applying to study – Tier 4</li> <li>How long can students stay?</li> <li>Extending Tier 4 (General) permission to stay</li> <li>Bringing families to the UK</li> <li>Tier 4 (Child) student visa</li> <li>Work placements, internships and meeting students' need</li> </ul>	Associate Level
<ul style="list-style-type: none"> <li>Tier 1 Entrepreneur visa</li> <li>Tier 1 Graduate entrepreneur visa</li> <li>Tier 1 Exceptional talent visa</li> <li>Tier 1 Investor visa</li> <li>Tier 2 Visas</li> <li>Tier 2 General work visa</li> <li>Tier 2 Intra-company transfer visa</li> <li>Tier 2 Minister of religion visa</li> <li>Tier 2 Sportsperson visa</li> <li>Short-term work visas</li> <li>Visa and immigration compliance</li> </ul>	Certified Level

### 3.1.2 BRIBERY ACT 2010

UK HEIs, their employees, subsidiary organisations and third-party contracted organisations providing services on their behalf – such as education agents – are all subject to the Bribery Act 2010, a breach of which can result in prosecution of the individual or the organisation. Recognising that the education agent is contracted by the HEI, the Act regulates various elements of the HEI-agent-student relationship, including the way an education agent or HEI uses ‘incentives’ to increase performance or improve their treatment. Below are examples of gifts/incentives that could be construed as bribes if not appropriately handled and reported:

- Gifts from HEIs to agents e.g. handbags to counsellors – the provision of small corporate gifts in a cultural context is acceptable, provided they are given without an expectation of a material return benefit
- Gifts to students to choose agency A over agency B – must be demonstrably part of a marketing campaign and proportionate to the situation
- Gifts by students to agents or HEIs to receive preferential treatment
- Expensive hospitality provided by an agent to an HEI to try and get a contract

This isn't to say that incentives cannot be used to increase performance or as part of genuine marketing efforts, but the giver and receiver must be able to demonstrate that the item is a proportionate and relevant incentive to the situation and that the gifts are recorded and reported in a transparent way. HEIs have bribery policies and gift registers for this purpose.

The British Council Agent and Counsellor Training Suite covers bribery and corruption in the Certified Level programme.

### 3.1.3 CHILDREN ACT 1989 AND WORKING TOGETHER TO SAFEGUARD CHILDREN STATUTORY GUIDANCE

Where an HEI is accepting students under the age of 18 (U18) at the point of enrolment, they must follow the Working Together to Safeguard Children Statutory Guidance<sup>9</sup> and must provide appropriate adjustments to protect the ‘child’. This might include secure accommodation, additional student services, removing access to alcohol, and other elements of student safety and welfare. An U18 student must provide the HEI with an acceptable ‘adult guardian’ in the UK – often, UK HEIs will have a relationship with guardian organisations and will refer U18 students to these organisations (such as those listed on the Association for the Education and Guardianship of International Students’ website<sup>9</sup>).

The HEI may be liable for the contracted agent’s behaviour in relation to an U18 student (this is situational and also somewhat dependent on local legislation in the source market), so must train the education agent on how to handle U18 cases. Similarly, the education agent must provide appropriate advice to U18 students.

“My agent didn’t provide me any advice about being under 18 in the UK. I didn’t realise I couldn’t attend uni events where there was alcohol or couldn’t get certain jobs. I was really annoyed by this.”

UNDERGRADUATE STUDENT FROM NIGERIA



The British Council Agent and Counsellor Training Suite covers child protection in the Assistant and Associate Levels, and Tier 4 (Child) student visas in the Associate Level programmes.

### 3.1.4 COMPETITION ACT 1998

HEIs are subject to competition law, as they are delivering a product (course) to a market and are therefore competing with one another for customers (students). They cannot collaborate/collude on areas such as price. The same applies in relation to commission payments to education agents, where sharing of commission rates between HEIs could be construed as collusive behaviour.

When a company or institution divulges commercially sensitive or confidential information, there is a risk that the information sharing:

- mutes competition between them (by reducing the uncertainty as to how one or other competitor will behave)
- leads to a collusive outcome (whereby the companies agree on a course of action)

In the case of commission payments, the collusive behaviour could restrict other HEIs from competing in a market; however, note that sections 2.9.2 and 2.9.4 demonstrate that where an education agent is paid a higher commission, this does not necessarily mean they will favour that institution and that financial return is not the only driver for an education agent placing a student. Similarly, education agents working as a consortium and sharing best practice is not collusion, but, should they set prices together, which disadvantages education agents outside of the consortium, there could be a case for collusive behaviour, and the contracting HEI could be found responsible for this behaviour.

The British Council Agent and Counsellor Training Suite covers competition for international students in the Certified Level programme.

As with other areas of legislation, there are also local contexts (source market) that also dictate what an education agent can and cannot do (see section 3.1.7).

### 3.1.5 DATA PROTECTION ACT 2018

Since 2018, HEIs have had to adapt their agreements with education agents to explain:

- what information they hold about an education agent and how it might be used (this could include contact details, bank and financial details, due diligence information, details of students and other areas of data /information sharing)
- when data might be shared, e.g. where it is legally required by regulators, government agencies, etc., or where the education agent has given permission
- the education agent’s rights surrounding the capture, storage and use of their data
- the process for complaints/recourse

Education agents working with UK HEIs (and HEIs themselves) must explain to applicants the same four main areas and outline the requirement for them to ‘opt in’ to this usage of their personal information – the obvious primary consideration is the sharing of a student’s personal data with the HEI that the student is applying to and the reciprocal exchange of information (offer letters, acceptance letters, etc.) between the education agent and UK HEI on behalf of the student.

Education agent good practice is to have a signed contract with the student acknowledging their acceptance of this kind of data sharing (the ‘opt in’). HEIs will usually have this built into the declaration on their application form (or in enquiry/web forms if earlier in the recruitment cycle).

It is difficult to confirm whether or not all education agents are fully complying with the Data Protection Act or the indicated good practice, but the British Council Agent and Counsellor Training Suite covers General Data Protection Regulation (GDPR) and fraud in the Assistant Level; and GDPR, FoI and intellectual property (IP) in the Certified Level programmes to help them confirm.

#### FINDING

Education agents should maintain a signed agreement with the student agreeing to their personal information being used for the purpose of executing the education agent services. Providers should require this under the education agent contract.

It should be noted that GDPR is a European Union regulation and it is unclear whether it will continue to apply in regard to non-EU students and/or companies after the UK exits.

<sup>9</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/836519/tier-4-guidance-v48.0-ext.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/836519/tier-4-guidance-v48.0-ext.pdf)



### 3.1.6 MONEY LAUNDERING AND TERRORIST FINANCING (AMENDMENT) REGULATIONS 2019

This legislation dictates certain HEI financial processes, which, in turn, affect the education agent relationship through, for example, the payment of tuition fees and commissions. Good practice would include that money should not be paid to personal accounts of education agents unless there is a clear reason for doing so, and that refunded money should be to the same account that it was received from, unless there is an acceptable reason for not doing so. Education agents should be advising students accordingly.

#### FINDING

Training education agents on compliant financial processes should form part of the provider's training of education agents and should be added to the British Council training.

The British Council Agent and Counsellor Training Suite does not directly cover costs and financing, but does cover fraud prevention in both the Assistant and Associate Level programmes.

### 3.1.7 CONSUMER PROTECTION LAW

The Competition and Markets Authority (CMA) has published useful guidance for Higher Education Providers on the legal obligations under Consumer Law. This guidance, which mirrors elements of the QAA's Quality Code for Higher Education (see 3.2.4), states that HEIs must provide prospective students with:

- the course content and structure
- the total costs of the course including tuition fees and any additional costs associated with the course, such as field trips, lab equipment or bench/studio fees
- terms and conditions, including any rules and regulations that students are bound by
- any changes made to the course or otherwise before making an offer of a place to an applicant
- information on how a student can make a complaint (currently this is direct to the HEI as there is no independent ombudsperson for prospective students – note it is unclear if the Scottish Public Services Ombudsperson does or does not accept complaints for prospective students)

As such, the contracted education agents must be trained on a sufficiently regular basis to effectively provide this information to prospective international students on behalf of the HEI. Failure to do so can result in legal proceedings.

#### FINDING

The CMA's guidance should be built into education agent training and education agents should be given regular updates by the provider on any changes to courses e.g. cost. This consumer law helps protect prospective students from some of the risks identified in section 2.9. This incredibly important tool is widely used by HEIs already, but needs to be adopted throughout the UK's international education sector.

### 3.1.8 LOCAL LEGISLATIVE ENVIRONMENT (SOURCE MARKET)

In 2018/19, the UK hosted international students from more than 160 countries (including the EU). The survey of education agents received responses from over 50 non-EU countries (including responses from all of the UK's top 10 markets, which represent 70% of all international non-EU students in the UK. The businesses in these countries are subject to the legislative environment of that country, which may be minimal or require some kind of specific registration process.

"India doesn't have any licensing for overseas student recruitment as of now however once the Emigration Act 2019 and relevant bill will be passed it will become licensed profession which may allow better environment to business. Bill is in the final stage and will be passed soon. As of now we follow London Statement to keep the standards up to the mark."

AGENT

The complexity of this international matrix is beyond the scope of this report, but it is important for stakeholders to be aware that in some source markets, education agents are or will be subject to local regulation.

### 3.1.9 CONCLUSIONS ABOUT THE LEGISLATIVE ENVIRONMENT

The UK legislative environment regulating education agent behaviour outlined above is a solid base for the management of the education agent industry but is perhaps not well understood beyond education agents who have completed all Levels of the British Council Agent and Counsellor Training Suite. A basic understanding of these regulations as provided by the training programme would benefit all education agents representing UK institutions and provide a good quality baseline at this level which should be at the heart of the UK's agent quality assurance.

The integrity of the UK student visa system is an important part of this, and while the Home Office acknowledges that good education agents help to minimise abuse of the system, through their data and in-market outreach, they are aware of education agents who are damaging the UK's education brand by defrauding students and potentially damaging students' chances of getting a visa.

#### FINDING

Greater sharing of information between providers and the Home Office could facilitate a more responsive system allowing providers and the Home Office to identify trends quickly and act accordingly and ensure the applications of appropriately qualified students are not held up by the actions of a very small minority. This might include the sharing of aggregate agent visa data.

<sup>8</sup> <https://www.gov.uk/government/publications/working-together-to-safeguard-children--2>

<sup>9</sup> <https://aegisuk.net/guardianship-organisation/> There may be guardian organisations used by HEIs other than the guardian organisations listed on this website



### 3.2 SECTOR APPROACHES

This section considers some of the UK sector-led initiatives that directly or indirectly help to 'regulate' education agent behaviour.

#### 3.2.1 THE LONDON STATEMENT

Published in 2012 after agreement from the UK, Australia, Ireland and New Zealand, the London Statement is a 'statement of principles for the ethical recruitment of international students by education agents and consultants' that states:

<b>Principle 1</b>	Agents and consultants practise responsible business ethics.
<b>Principle 2</b>	Agents and consultants provide current, accurate and honest information in an ethical manner.
<b>Principle 3</b>	Agents and consultants develop transparent business relationships with students and providers through the use of written agreements.
<b>Principle 4</b>	Agents and consultants protect the interests of minors.
<b>Principle 5</b>	Agents and consultants provide current and up-to-date information that enables international students to make informed choices when selecting which agent or consultant to employ.
<b>Principle 6</b>	Agents and consultants act professionally.
<b>Principle 7</b>	Agents and consultants work with destination countries and providers to raise ethical standards and best practice.

While UKCISA has adopted it in full as their Code of Practice for agents<sup>10</sup>, and the British Council refers to it in their training and links to a simplified version on their website<sup>11</sup>, Edified did not find reference to the London Statement on other UK peak body and sector membership organisation websites or on a small sample of HEI websites. Despite this, the survey results and stakeholder consultations suggest that there is broad support for a Code of Practice to be enforced in some way.

"I think we should work with BUILA to develop a watertight, standard agency agreement template for use by all HEIs that incorporates the London Statement and adequately covers all aspects of agent selection recruitment, training monitoring and evaluation (i.e. against metrics such as the visa refusal rate, no-shows, non-completion rates and submission of fraudulent documents) without being overly punitive ... and which still gives the institution the flexibility to determine how they want to manage individual relationships." – HEI STAFF

<sup>10</sup> <https://www.ukcisa.org.uk/Membership/Codes-of-practice/Code-of-practice-for-members-and-subscribers>  
<sup>11</sup> [https://www.britishcouncil.org/sites/default/files/london\\_statement.pdf](https://www.britishcouncil.org/sites/default/files/london_statement.pdf)

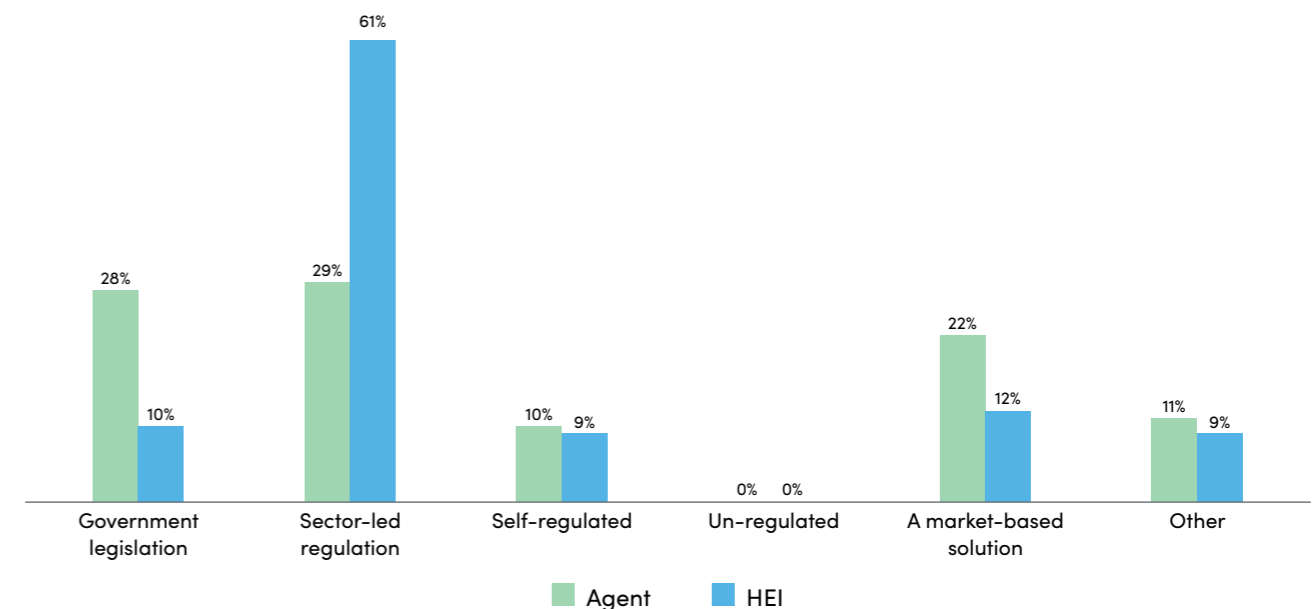
"The problem with the London Statement is not that it does not provide a good set of Principles; it's that not all agents know of its existence, or choose to adopt it if they do. If a UK industry standard is established and applied by the sector this will benefit the institution and the UK as a whole. Sector-led regulation would be my choice..."

HEI STAFF

"The principles (1,2,3,5 and 6) of the London statement are not being followed by some agencies which operate in my country... Instead of informing students and indeed investing time with them – which is what I have been doing so far – some agencies neglect the application process and are basically a HE shop. We are not selling cars; we are actively helping students in deciding their future."

AGENT

If the UK developed some form of framework to regulate agents, what kind of approach do you believe will be most effective in ensuring the quality of services provided by agents whilst supporting the UK's international recruitment objectives?



Base: Respondents – agents n=305, HEIs n=105

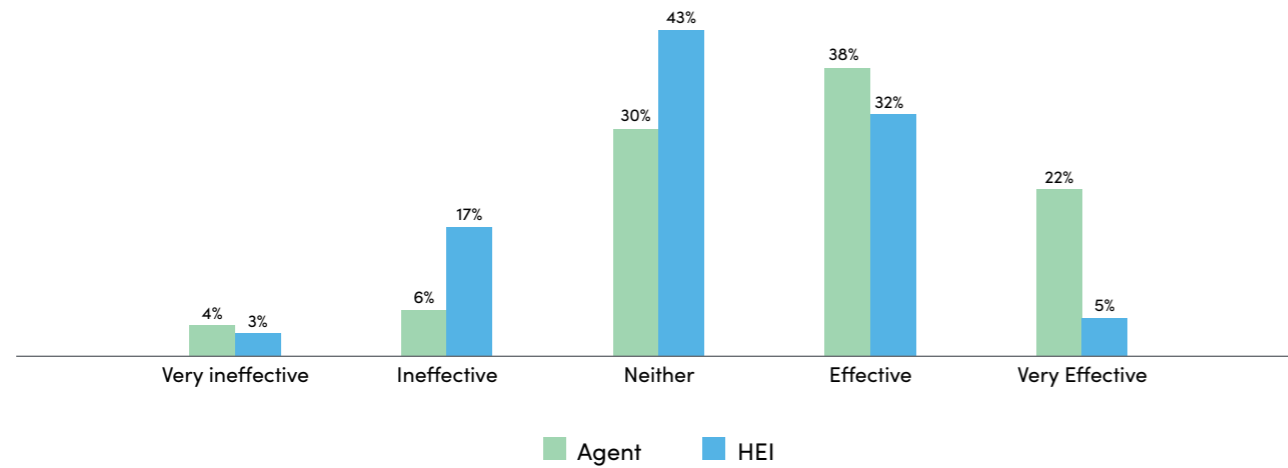
The research results show that there is a strong convergence of HEIs and education agents views on the likely effectiveness of the introduction of some kind of government regulation. As detailed later in 3.4 this may be because some agents reported liking the clarity of the Australian and New Zealand regulatory environments. It could also be because inclusion in a government endorsed programme provides a high level of credibility to the education agent in many of the source markets.

#### FINDING

Gaining government endorsement of the UK's quality assurance framework will help education agent uptake and engagement.



**Overall, how effective do you rate the London Statement in providing a quality framework for agents representing UK HEIs?**



Base: Respondents – agents n=305, HEIs aware of The London Statement n=77  
 ^ HEI were also given an option of 'Not aware' – selected by 27%



**FINDING**

The London Statement is a directly relevant code of conduct for education agents. It needs to be reviewed, but an updated variant could form the central element of a sector-led quality framework for agent quality assurance in the UK, which already has a degree of support from institutions and education agents alike.

The British Council Agent and Counsellor Training Suite covers The London Statement at Assistant Level, and professionalism and ethical behaviour at the Associate Level.

**3.2.2 BRITISH COUNCIL AGENT AND COUNSELLOR TRAINING SUITE**

The contents of the British Council Agent and Counsellor Training Suite have been discussed in relation to the relevant legislation (see section 3.1) and sector-led initiatives (see section 3.2). It also incorporates information about study levels and types, studying for a UK qualification offshore/online, tips on student life and preparation for studies, and key destination marketing messages.

The content maps well to the key areas the UK sector requires its education agent partners to understand, but the uptake of the course is relatively low compared to, for example, the Australian training which has over 7000 trained agents listed compared to 500 UK education agents listed (a further 2000 are at some stage of study).

While 75% of HEIs believe it's important for new agents to complete the British Council agent training programme, only 50% of agents do. Furthermore, one quarter of agents do not currently use the British Council agent training programme, with lack of relevance or high cost as reasons. Furthermore, some experienced education agents reported feeling more informed than the training programme content. Further review of the programme suggests that while there are still some areas for development, it has undergone major improvements in recent years.

The free text comments in the surveys also suggest that some HEI staff and education agents did not have a good awareness of the current British Council training programme execution and content highlighting the opportunity for closer HEI and agent involvement in programme design, and cross sectoral endorsement.

**FINDING**

If the issues of cost and company recognition can be addressed, a reorganised British Council training suite, co-designed with experienced education agents and senior UK provider staff, would form an integral part of a national quality framework for education agents.



### 3.2.3 BRITISH COUNCIL GOOD PRACTICE GUIDANCE AND ADDITIONAL RESOURCES

In addition to the training suite, the British Council offers through its website<sup>12</sup> a range of resources to help education agents represent the UK effectively, including the following:

- Recruitment of agents; A legal overview
- Managing Education Agents report
- Guide to good practice for education agents
- The Study UK Agents Starter Pack – marketing resources

The legal overview is returned to in section 3.3; the education agent report dates from 2013 and it is hoped that this report draws and expands on its findings; and the marketing resources, while useful, are beyond the scope of this project. The 'Guide to good practice for education agents' is directly relevant to this work.

The 'Guide to good practice for education agents' was developed as part of the Education UK Agent strategy that emerged out of the second phase of the Prime Minister's Initiative (PMI2) for International Education, between 2006 and 2011.

"The focus of the strategy was to encourage more UK institutions across all sectors to engage with professional, quality agents when recruiting international students. Recognising their influence we proactively engaged them as marketing partners for Education UK, establishing agents zones on the Education UK website and branded marketing collateral to promote the UK in-market." – **BRITISH COUNCIL STAFF MEMBER**

The original education agent training programme (see section 3.2.2) was also launched at that time. The guide remains a useful resource, with a number of HEIs requiring adherence to it in their contracts. It is also well recognised by education agents who have participated in the training programme, and understood by education agents that have engaged with the training suite and related web resources<sup>13</sup>.

Most of the HEIs cited by education agents as having the best practice in agent relationship management all mentioned their use of this document and that they distributed it to their new agents when issuing contracts.

#### FINDING

The British Council 'Guide to good practice for education agents' could be used in conjunction with the London Statement to develop a single Code of Ethical Practice for education. For it to be effective, it needs to be adopted and published by all sector segments and stakeholders.

<sup>12</sup> <https://www.britishcouncil.org/education/education-agents/good-practice-guidance-uk-information>

<sup>13</sup> <https://www.britishcouncil.org/education/education-agents/good-practice-guidance-uk-information>

### 3.2.4 THE UK QUALITY ASSURANCE AGENCY FOR HIGHER EDUCATION'S QUALITY CODE FOR HIGHER EDUCATION

The UK Quality Code for Higher Education 2018<sup>14</sup> sets out the expectations, and core and common practices that all HEIs are required to meet under the national regulatory system. Unlike its moderately prescriptive predecessor, the 2018 Code is outcomes based so does not specify a process that should be followed. It was written to allow HEIs to use different approaches to meet the expectation. The relevant 'Expectations for quality' in the context of this report is

"From admission through to completion, all students are provided with the support that they need to succeed in and benefit from higher education."

The relevant 'core practices' are

- The provider has a reliable, fair and inclusive admissions system.
- The provider actively engages students, individually and collectively, in the quality of their educational experience.

The Code is supplemented by a series of 12 non-regulatory advice a guidance themes which illustrate possible approaches to meet the requirements of the Code. The Admissions, Recruitment and Widening Participation guidance<sup>15</sup> has six 'guiding principles' of which the following are relevant

1. Policies and procedures for application, selection and admission to higher education courses are transparent and accessible.

Not necessarily specific to education agents, it could be argued that recruitment using education agents should be included the policies and procedures or subject to specific policies and procedures that are regularly reviewed.

4. Information provided to prospective students for recruitment and widening access purposes supports students in making informed decisions.

Part of making an informed decision is understanding how an education agent is being paid and receiving accurate advice from an education agent. HEIs can determine this through new arrival surveys and internal data mining e.g. correlating education agents with first-year drop-out/transfer rates, visa refusal rates, offer conversion rates, etc.

5. All staff, representatives and partners engaged in the delivery of admissions, recruitment and widening access are appropriately trained and resourced.

An HEI must be able to demonstrate that it has trained its education agents accordingly, presumably through some kind of audit trail. This might be done through a standardised training pack and a record of training dates. The guidance goes on to state:

"Higher education providers that contract the services of external education agents undertake due diligence during the appointment of those agents and take steps to ensure that they are reputable and competent in advising on UK higher education."

See section 3.3 for more details on institutional good practice in working with education agents.

During interviews with HEI staff, a number indicated that as part of their university's QAA audit, they were asked to provide evidence of compliance with the core practices and guiding principles (or the relevant indicators of the previous Quality Code, 2013) as they relate to international student recruitment practices including when using education agents. In addition, several cited their internal audit teams picking QAA Quality Code indicators and guiding principles and requesting evidence of compliance as part of their annual schedule of works.

#### FINDING

It would be useful to provide HEIs with a standardised Agent Quality Assurance Health Check proforma that builds on the QAA guidance, for HEI internal audit offices.

<sup>14</sup> <https://www.qaa.ac.uk/quality-code>

<sup>15</sup> <https://www.qaa.ac.uk/en/quality-code/advice-and-guidance/admissions-recruitment-and-widening-access#>



### 3.2.5 CONCLUSIONS ON SECTOR APPROACHES

While an education agent quality assurance framework was not specifically explored with students, their suggestions on how education agents could improve align with a framework that focuses on students' needs:

- Clarity around what an agent does and how they can help students
- More transparency about the overall process
- Ensure students and their families are empowered to make the final decision
- Publish/share student placement success rates and stories

“Show enough information to students like past successful application cases and let students make more decisions.”

UNDERGRADUATE STUDENT FROM CHINA



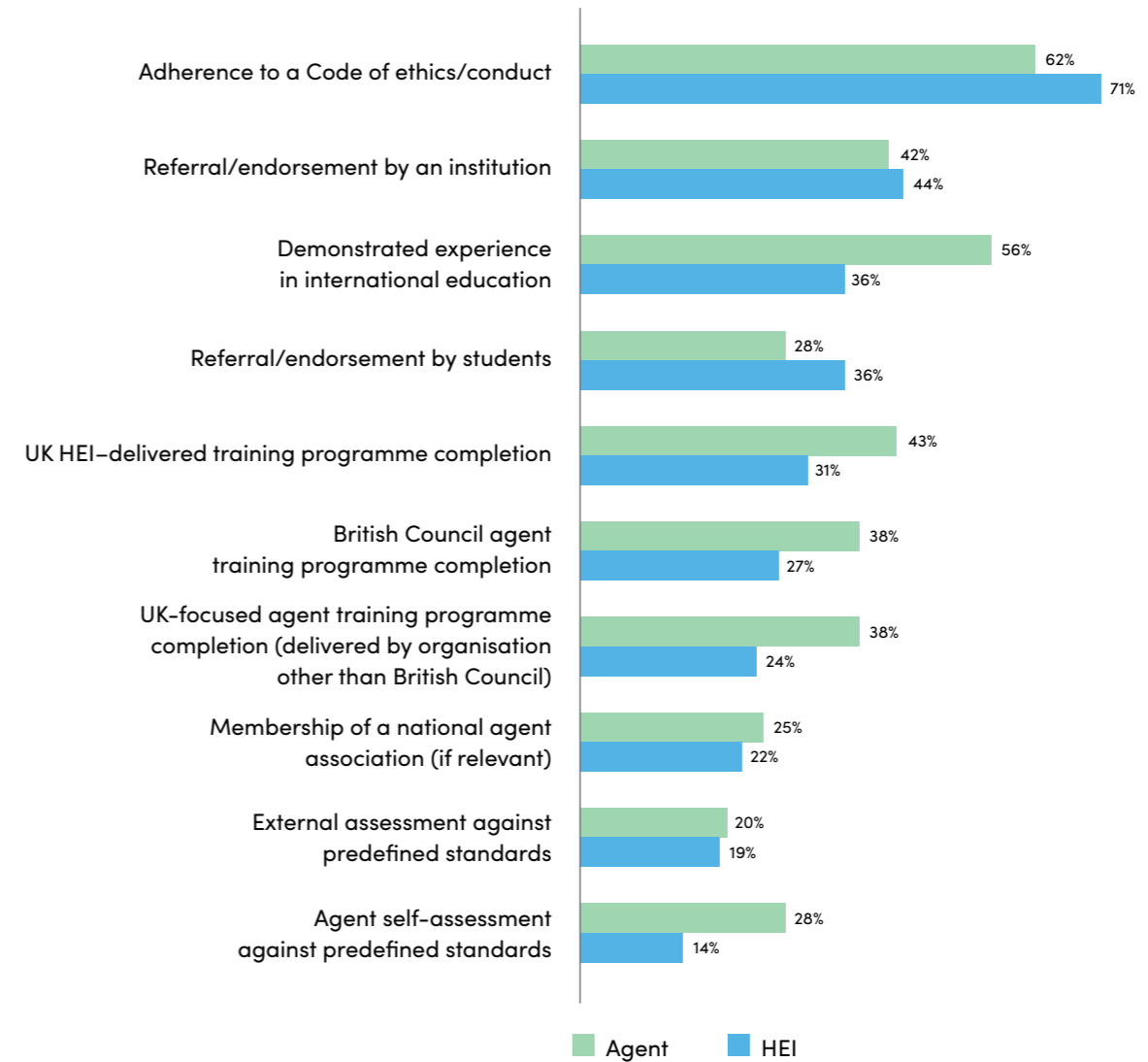
The surveys indicated that 100% of education agents agreed that a regulated framework would be effective in ensuring the quality of service from education agents, and over half (54%) were in favour of an education agent accreditation model, but only 43% of HEI staff supported a UK agent accreditation model, with around one in three of HEIs and agents unsure.

The major concerns about a full accreditation system included:

- cost of administering disproportionate to potential benefits;
- increased administrative burden could make the UK less attractive; and
- potential barrier to access for ethical new entrants.

there was more support for a sector-led initiative.

If the UK was to introduce an agent quality assurance framework, please rate the level of importance of the following standards to be included for INITIAL SET-UP / ESTABLISHING AN AGENCY  
% Rated 'Very Important'



Base: Those who said 'Yes' to 'UK needs an accreditation model', agents n=152 to 163, HEI n=42 to 45

\* Sample size <50, results indicative only

#### FINDING

A code of conduct, and comprehensive and engaging training are valued and should be central to a quality assurance framework.



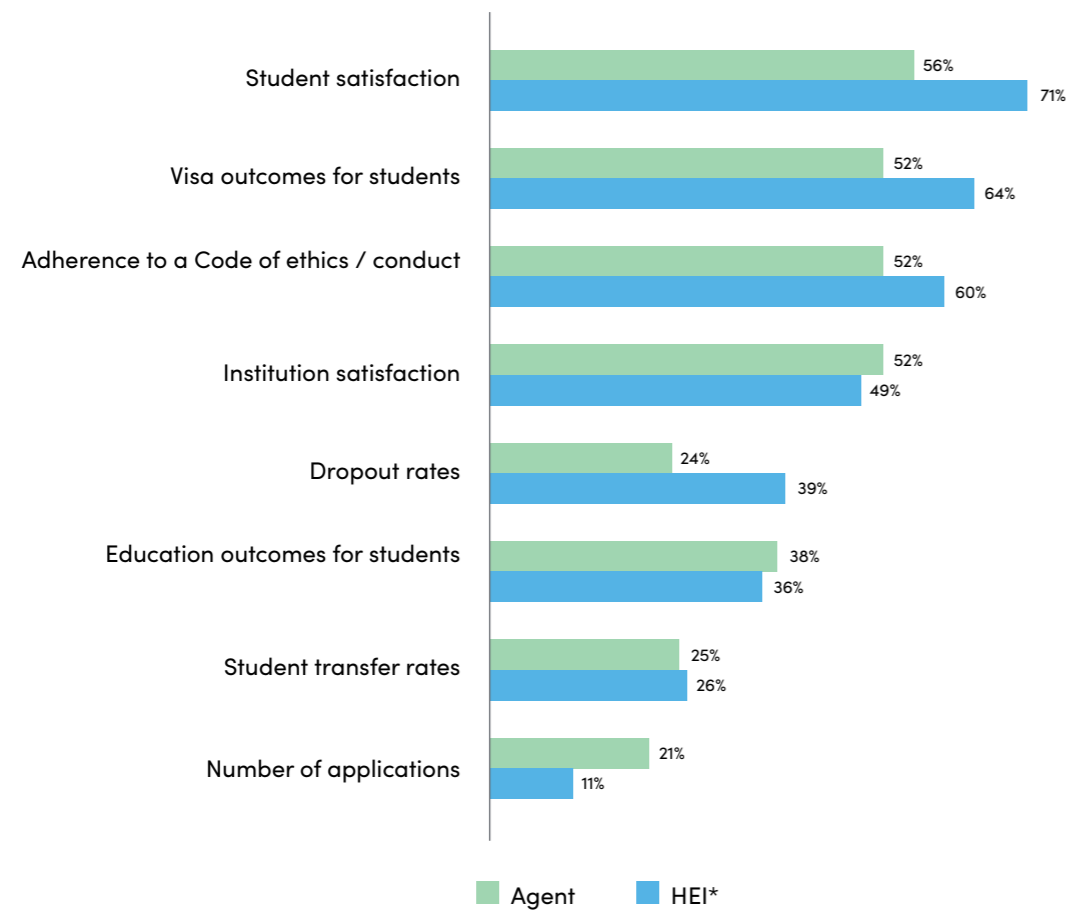
**If the UK was to introduce an agent quality assurance framework, please rate the level of importance of the following standards to be included for INITIAL SET-UP / ESTABLISHING AN AGENCY**

Rated 'Very important / Important'	Agent	HEI
British Council agent training programme completion	67%	77%

Base: UK needs an accreditation model = Yes, agent n=163, HEI n=44

Adherence to a Code of ethics/conduct is seen as a key element for the ongoing management of a quality framework, along with regular monitoring of student and institution satisfaction, and student visa outcomes.

**If the UK was to introduce an agent quality assurance framework, please rate the level of importance of the following standards to be included for ONGOING MANAGEMENT / MONITORING AN AGENCY**  
% Rated 'Very Important'



Base: Those who said 'Yes' to 'UK needs an accreditation model', agents n=159 to 163, HEI n=43 to 45

\* Sample size <50, results indicative only



**FINDING**

An independent complaints review process for prospective students (complementing existing processes such as CMA) could help providers to uncover and take action on poor education agent practice and highlight previously unseen practices of sub-agents. However, greater instigating greater awareness of existing institutional complaints processes and implementing student satisfaction feedback loops should be prioritised. This would also build confidence amongst prospective students that the systems are robust and agents will be held accountable.

Sections 3.1 and 3.2 demonstrate that a lot of the elements of an education agent partner quality assurance framework are already in place or could be put in place relatively easily, but with a cost implication, as well as questions over who should run the scheme.

<sup>16</sup> <https://www.oiahe.org.uk/>

### 3.3 INSTITUTIONAL FRAMEWORKS

While the current QAA guidance (see 3.2.4) only briefly mentions education agents, the QAA's 'Supporting and Enhancing the Experience of International Students in the UK: A Guide for UK Higher Education Providers' (2015) listed their views on good practice in the use of education agents which broadly mirrors the basic framework arrived at through the survey results discussions with HEI staff and education agents. Basic elements of HEI education agent management practice include:



When asked what makes an education agent-HEI relationship really positive, education agents said it centres around regular communication, timely responses and mutual respect. Conversely, when these elements are not at play they can negatively impact the education agent-HEI relationship, as can unrealistic or unachievable targets being set by the HEI.



Word-cloud based on responses to the question 'What makes it a really positive agent-HEI relationship?'

"Regular communication and updates/training support, swift response to emails and applications, in person visits to agents."

**AGENT**

"Proper training to agents, assist them to know all details of Universities to advise students properly, closely follow-up with agent and their activities, marketing or promotional supports, quick feedback on admission process."

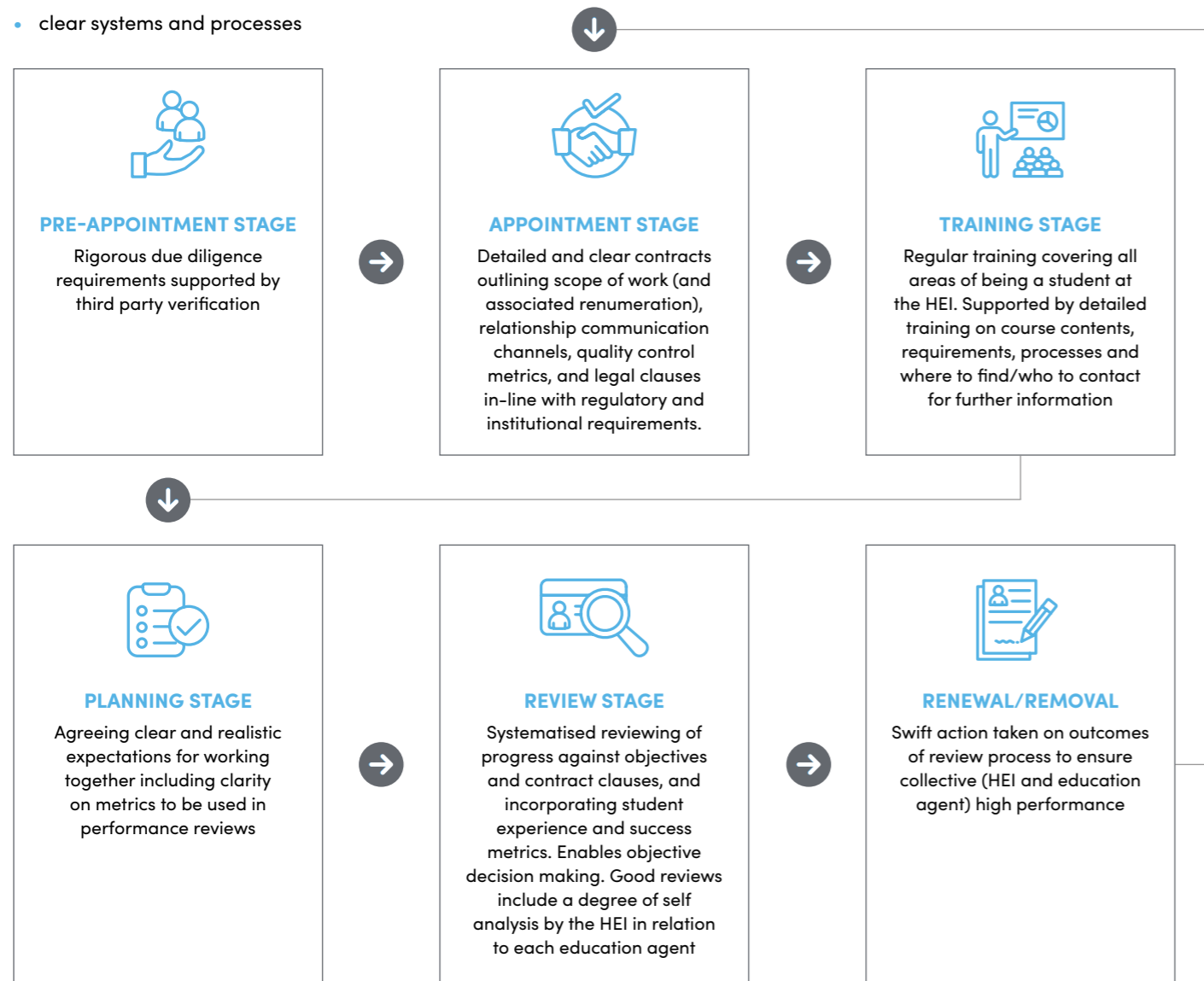
**AGENT**

In the past, it was common for education agents to approach HEIs for a contract, but increasingly HEIs approach education agents that complement their portfolio of partners i.e. giving them access to new market segments or regions, or perhaps sourcing applicants for new or underrepresented courses.

During the interviews with HEIs, several commented that they had heavily integrated their agent management practice with that of their private pathway providers to present a united 'brand' and clarity to the market on which education agents work with the HEI. When education agents were asked to identify a single HEI that excelled in education agent management, over 80 UK HEIs were put forward suggesting there is wide spread good practice in the sector. The HEIs that were cited as delivering the best practice by education agents all emphasised the relationship in terms of a 'partnership'.

The most commonly utilised relationship management framework by HEIs is illustrated below with each stage containing a range of risk mitigating and relationship developing strategies. The most sophisticated of these are include:

- a well-resourced international office team
- enabling and integrated IT systems
- clear systems and processes



CLEAR AND REGULAR COMMUNICATION      ACCURACY AND CONSISTANCY      TRAINING



A well-considered and implemented relationship management framework, supported by clear communication between the contracting HEI and their education agent partners delivers mutually beneficial outcomes for the HEI, the education agent and importantly the student. In addition, to help students make fully informed decision, HEI and education agent best practice includes being clear about:

- which HEI works with which education agent;
- what services the education agent is contracted to deliver; and
- the commercial nature of the relationship.

**FINDING**























The adoption of a robust and transparent process for the identification, contracting and retention of education agents will help HEIs to partner effectively with their agent network. A shared good practice guide would serve to benefit all parties. The British Council hosts the 'Recruitment Agents; A Legal and Regulatory Overview'<sup>18</sup> document on its website, which considers the legal aspects of utilising education agents.



<sup>18</sup> <https://www.britishcouncil.org/sites/default/files/recruitment-agents-a-legal-and-regulatory-overview.pdf>

### 3.4 COMPARISON OF APPROACHES WITH COMPETITOR DESTINATION COUNTRIES

The table below illustrates the education agent quality frameworks of five competitor destination countries: Australia, Canada, France, New Zealand and the USA.

	Institution led			Government led				Agent/Sector led				Agent Evaluation
	Fee Paying	Commission based contracts	Responsibility for due diligence	Monitoring/ reg/compliance body	Endorsed agent register	Regulated code of practice	Agents visa refusal/issuance data provided to institutions/public	Code of ethical conduct and complaints process	Certification Body	National Reward & recognition system for agents	Agent training (voluntary)	% rating Effective / Very effective
 <b>United Kingdom</b>	✓	✓	✓	✗	✗	✗	✗	✗		✗		60%
 <b>Australia</b>	✓	✓	✓		✓	✓			✗			72%
 <b>Canada</b>	✓	✓	✓	✗	✗	✗	✗	✗		✗		63%
 <b>France</b>	Varies	Varies	✓	✗	✗	✗	✗	✗		✗		-
 <b>New Zealand</b>	✓	✓	✓				✓		✗		✓	62%
 <b>United States of America</b>	✓	✓	✓	✗	✗	✗	✗	✓		✗	✓	58%



#### FINDING

Although Australia and New Zealand have a more regulative approach than the UK, the education agents surveyed indicated that they were more satisfied with this approach than that of the UK or other markets.

“The Australian system is well regulated, easy to use and not-for-profit. The American system (AIRC) is a cash grab and we refuse to participate in it. We would be highly supportive of a UK version of the Australian system that helps increase the credibility of agencies and ensures our competitors are being ethical in their practices.” – AGENT





### 3.4.1 AUSTRALIA – HIGHLY REGULATED APPROACH

Education agents play a significant role recruiting students to Australian education providers – in 2018, 73% of higher education enrolments were placed by education agents. Australia has education agent-specific legislation – the Education Services for Overseas Students Act 2000 (ESOS Act) – accreditation and training schemes, and a code of practice. Education agent data capture is also integrated into the visa process, with reports published on agent visa success rates.

The Australian Department of Home Affairs administers the Education Agent Training Course (EATC)<sup>19</sup> to provide a quality assurance to Australia’s international education industry, and support agents by providing training and professional development. The training content and platform are outsourced to Professional International Education Resources (PIER)<sup>20</sup>. While the training is free at point of delivery, individuals must take a test (\$400) to gain certification and be listed as a Qualified Education Agent Counsellor (QEAC) (over 4,500 listed). There is a simple search function to find a QEAC, and the education agent company name is listed with the certified individual.

The National Code 2018<sup>21</sup> is a legislative instrument made under the Education Services for Overseas Students Act 2000 and sets nationally consistent standards to support providers to deliver quality education and training to overseas students. Within the code, Standard 4: Education Agents states:

Registered providers must:

- have a written agreement with each education agent they engage with
- enter and maintain education agent details in Provider Registration and International Student Management System (PRISMS)
- ensure education agents have appropriate knowledge and understanding of the Australian International Education and Training Agent Code of Ethics
- ensure education agents act honestly and in good faith
- take immediate corrective action, or terminate a relationship if an agent (or an employee or subcontractor) is not complying with the National Code
- and not accept overseas students from an education agent if it knows or suspects that the education agent is engaging in unethical recruitment processes

The Australian International Education and Training Agent Code of Ethics (ACE) (2016)<sup>22</sup>, while not mandatory, is an important component of the framework, and provides a guide to the expected professional behaviour of individual agents and agencies working with Australian international students and their parents, providers and fellow agents across the sector. The ACE builds on the London Statement’s ethical framework and provides a set of Australia-specific standards for Australia’s education agents.

This highly regulated environment has led to a number of education agent networks and membership organisations being formed that often require adherence to their own codes of conduct. These are not always accepted by Australian HEIs as an indicator of an education agent’s quality though. Some examples include:

- ISEAA – International Student Education Agents Association. Goal to be the peak body for education agents working in the Australian sector.
- AAERI – Association of Australian Education Representatives in India (covers South Asia). Established in 1996, provides a Code of Ethical Practices.

<sup>19</sup> <http://eatc.com>

<sup>20</sup> <https://pieronline.org/>

<sup>21</sup> <https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx#:~:text=The%20National%20Code%20is%20a,commenced%20on%201%20January%202018.>

<sup>22</sup> <https://internationaleducation.gov.au/News/Latest-News/Documents/Australian%20International%20Education%20and%20Training%20-%20Agent%20Code%20of%20Ethics.pdf>



### 3.4.2 CANADA – LOW REGULATION

The Canadian government does not regulate, accredit or endorse education agents, and under the Immigration and Refugee Protection Act<sup>23</sup>, it is illegal for anyone but an authorised representative (a person you name and who has the required skills and training) to charge fees to help people with immigration and refugee applications to Canada. Education agents are prohibited from advising on immigration matters under the Canada’s Bill C-35 (a citizenship and immigration bill that regulates immigration consultants), but can still assist with filing documents.

There is, however, a range of training opportunities, national and territory-/province-focused, supporting education agents to better understand and ‘destination market’ a study location, some of which provide recognition through certification – there are over 1000 CCEA graduates listed on the Qualified Education Agents website<sup>24</sup> for example. Independent research conducted in 2015 found that institutional agent management processes in Canada were generally robust, although with regular changes to student visa and post-study work visa policy, it is likely institutional processes will have developed.



### 3.4.3 FRANCE – UNREGULATED

France is the most unregulated of the five countries in this comparative study. However, it also has the lowest level of agent commercial engagement, with international tuition fees at public universities only being an option since 2019 – most HEI’s maintained their no-fee status. But there is a strong private sector, and the introduction of public sector fees is likely to result in an education agent market.

ICEF (International Consultants for Education and Fairs) offers agent certification and information for French institutions seeking to work with agents. The European Association for International Education (EAIE), updates educational institutions on existing ethical guidelines in Europe, and possible pitfalls when collaborating with agencies, but this is all optional.

Campus France, a government education promotional department (in collaboration with Instituts Francais and Alliances Francaises), manages a central application platform and procedure allowing students from over 40 countries to apply to any institution in France, referred to as ‘Etudes en France’ (Studying in France).

There is no code of practice or agent regulations in place in France.

<sup>23</sup> <http://www.parl.ca/LegisInfo/BillDetails.aspx?billId=4588746&Language=E&Mode=1>

<sup>24</sup> <https://qualified-education-agents.com>



### 3.4.4 NEW ZEALAND – HIGHLY REGULATED APPROACH

Education New Zealand is the government agency for the promotion of international education. The Education New Zealand Recognised Agents (ENZRA)<sup>25</sup> programme and register was established in 2012 and reviewed and substantially redesigned in 2018.

On an annual basis, ENZRA agencies need to meet three core standards to gain or retain Recognised Agency status:

1. Meeting a points target and minimum visa approval rate
2. Meeting core conduct requirements
3. Undertaking training as required

All ENZRA agencies must agree to follow the 'Education New Zealand Code of Conduct and Complaints Process'<sup>26</sup>. The code of conduct is based on the principles of the London Statement, to which New Zealand is a signatory and to which ENZRA agencies must affirm their commitment to upholding. Agencies must also agree to follow the New Zealand Privacy Act (1993, due to be updated in December 2020).

Recognised agencies must undertake training (via the AgentLab training portal<sup>27</sup>), which is supplied by Education New Zealand (ENZ). This is to ensure they are providing current and up-to-date information to prospective students regarding the New Zealand education system, and Immigration NZ (INZ) visa requirements.

ENZRA recognition provides benefits to agents including

- promotion on the ENZ website
- destination marketing resources
- ENZRA brand logo
- agent events
- training updates

New Zealand has a code for the pastoral care of international students too. The Education (Pastoral Care of International Students) Code of Practice 2016<sup>28</sup> outlines the full legal requirements that education providers enrolling international students must abide by. 'Outcome 2: Managing and Monitoring Agents' requires that:

Signatories must effectively manage and monitor their agents (that is, those agents that signatories have contracted to represent them) to ensure that those agents:

1. provide international students with reliable information and advice about studying, working and living in New Zealand; and
2. act with integrity and professionalism towards prospective international students; and
3. do not breach the law or jeopardise the signatory's compliance with this Code.

(extract from Education (Pastoral Care of International Students) Code of Practice 2016)

INZ publishes visa approval rates for full transparency. Offshore student visa application decision data showing approval and decline rates by country can be accessed publicly on the government ministry's website. INZ visa data captures agency data against student visa application records, which enables this level of reporting. INZ also publishes agency visa approval data for agents in India, the Philippines and Vietnam.

<sup>25</sup> <https://enz.govt.nz/support/agent-engagement/enz-recognised-agent/>

<sup>26</sup> <https://enz.govt.nz/assets/Uploads/Education-New-Zealand-Code-of-Conduct-and-Complaints-Process-2020.pdf>

<sup>27</sup> <https://agentlab.enz.govt.nz/login>

<sup>28</sup> <https://www.nzqa.govt.nz/providers-partners/education-code-of-practice/>



### 3.4.5 USA – MODERATELY REGULATED APPROACH

The National Association for College Admission Counseling's (NACAC) modified the approach and language within its 'Statement of Principles of Good Practice'<sup>29</sup> in 2013. This effectively removed the prohibition on US educational institutions using commission-based agents to recruit international students. This has opened the door to a broader acceptance of the use of international student recruitment agencies, provided institutions ensure **accountability, transparency and integrity** while doing so.

There is no federal government regulation of international education agencies. The US State Department has only recently permitted Education USA to include education agents in events, provided their association with US HEIs can be validated.

US HEIs can access best practice guidelines for working with education agencies from the American International Recruitment Council (AIRC)<sup>30</sup> whose purposes are as follows:

1. *Develop standards of ethical practice<sup>31</sup> pertaining to recruitment of international students to American educational institutions, such standards to address two constituencies: educational institutions and student recruitment agents*
2. *Develop best practices<sup>32</sup> and training to assist overseas student recruitment agents and institutions themselves to better serve students seeking admission to American educational institutions*
3. *Establish a framework through which participating agents can have their practices certified. In addition, the organization may undertake other activities as are necessary to accomplish its goals*

(Extract from 'Mission and Vision', AIRC)

AIRC certification for agencies comes at a significant cost of USD\$10,000. Certified agents are listed on their agency finder<sup>33</sup>.

For HEIs, AIRC certification standards include best practice in agency management.

- *AIRC Certification provides a 'Seal of Approval' recognised by US Institutions and state agencies. AIRC Certified Agencies may display both the AIRC Certificate and the AIRC Certified Logo. AIRC Certification provides continuous improvement feedback on agency operations and is the U.S. Quality Standard for recruitment agencies.*
- *AIRC Certified Agencies are listed in the AIRC Certified Agency Finder where they can be identified by students, parents, and institutions.*
- *AIRC Certified Agencies become members of AIRC and gain a voice in a rapidly growing community concerned with professionalism in international student recruitment. Agency representatives sit on the AIRC Board of Directors*
- *AIRC Agency and Institutional Members share a password protected Directory of Contacts and online Forums through which they can exchange information and ideas.*
- *AIRC Agencies have access to AIRC Institutional members and other global educators and may attend the AIRC Conference, exhibit and also participate in the AIRC booth at the NAFSA national conference.*

(Extract from 'Frequently Asked Questions', AIRC)

ICEF offers a US destination agent training programme, USATC<sup>34</sup>, from which 390 agents, to date, have graduated.

<sup>29</sup> <https://www.nacacnet.org/globalassets/documents/advocacy-and-ethics/cepp/statement-of-principles-of-good-practice-spgp-with-highlights.pdf>

<sup>30</sup> <https://www.airc-education.org/>

<sup>31</sup> <https://www.airc-education.org/s/AIRC-Standards-2015.pdf>

<sup>32</sup> [https://www.airc-education.org/s/5\\_2-version-Booklet-Final\\_AIRC-Baseline-and-Best-Practice-Guidelines\\_20161.pdf](https://www.airc-education.org/s/5_2-version-Booklet-Final_AIRC-Baseline-and-Best-Practice-Guidelines_20161.pdf)

<sup>33</sup> <https://www.airc-education.org/airc-certified-agencies/#country>

<sup>34</sup> <https://www.icef.com/agent-training/icef-us-agent-training-course-usatc/>

## Part Four: Recommendations and Roadmap

This report demonstrates that there is an effective education agent quality assurance framework in place in the UK comprising legislation, sector led initiatives and individual HEI's practice.

The report outlines the role education agents play in the sector and why they are used by both HEIs and international students with a significant majority of surveyed international students reporting that the services they received from their education agent met or exceeded their expectations and the education agents reported that the UK is the best country to do business with (compared to competitor destination countries). The surveyed education agents also cited over 80 UK HEIs as exhibiting best practice in agent management, which suggests that there is widespread good practice across UK HEIs. The quality of this HEI practice is already regulated under the QAA Quality Code for Higher Education 2018 and the Competitive Markets Authority alongside the broader legislative environment described in Part Three. The Home Office also indicated that good education agents supported the effective management of the UK student visa scheme.

The current education agent quality assurance framework is complemented by a comprehensive training package run by the British Council which covers reasons to study in the UK and the education environment; the relevant legislation as it applies to the provider-education agent-international student relationship; and the sector led quality assurance initiatives and mechanisms that they need to work within. HEIs provide further training covering institutional specific approaches and sales propositions.

Around 50% of international students studying at UK HEIs used the services of an education agent showing how important a recruitment channel they are for the UK HEI sector.

"Without agents it would be very difficult to convert and get students to the UK. There are so many steps in applying to a university overseas and the agents can help answer questions saving reps a lot of time."

HEI STAFF

"Typically agents represent the diverse range of UK HEIs in a wide range of markets effectively and successfully, with legitimacy."

HEI STAFF

This is an excellent base on which to build, however there are opportunities for the UK to further improve its practice and correspondingly mitigate some of the identified risks of using education agents.

The student survey did find concerns around trusting education agents and their transparency with some mentioning that it was not always clear which education agent worked with which HEI. While it is logical that there would be some discontent, it is important that there are mechanisms in place for providers to be made aware of issues, so they continually improve their practice or, if necessary, take action against education agents. Similarly, it is important that providers are transparent to students about which education agents they work with. These areas raised by a small minority of students are also issues that some of the interviewed stakeholders had concerns with.

The comparison of the UK's framework with those of Australia, Canada, France, New Zealand and the USA demonstrated that there was relatively high satisfaction with the UK's approach even though it is not as highly regulated as some other countries – Australia and New Zealand. The comparison also highlighted some areas where the UK could strengthen its approach and other areas where it needs to better communicate existing elements. There was broad support for this strengthening among all stakeholders including education agents and HEI staff.

Through this research and the stakeholder discussions held during the project, it became clear that the recommendations should:

- support the UK's International Education Strategy goal of growing international student enrolments at UK providers
- try to improve transparency of the relationships between providers and their education agents
- try to avoid increases in workload for providers, education agents, and/or key stakeholders
- improve accountability and, in particular, student recourse, without significantly increasing bureaucracy
- support and maintain the integrity of the UK visa process
- be achieved at minimal cost
- be implemented in partnership with education agents

Where possible in the recommendations, the term 'provider' is used to demonstrate that the recommendations could be applied beyond the UK HEI sector.



KEY:

Existing but may need minor modification / better communication

Some existing practice, needs greater adoption

Newly developed initiative built on existing practice

<sup>35</sup> <https://www.gov.uk/government/publications/international-education-strategy-global-potential-global-growth>  
Under review at the time of writing

## 4.1 RECOMMENDATIONS



### RECOMMENDATION ONE

Develop and promote a National Code of Ethical Practice for UK Education Agent partners

Work in collaboration with stakeholders and education agents to develop a single Code of Ethical Practice for UK Education Agents. This should draw on the London Statement and the British Council's good practice guide for education agents. Once finalised, ask all relevant stakeholders to refer to it:

- on their websites
- in their training
- in provider contracts with education agents
- in education agent membership group requirements

It would be integrated with Recommendations Two and Three

#### Benefits of implementing

- sets expected standards for education agents
- provides a tool for providers to evaluate education agent practice
- reassures government about education agent practice
- aligns well with the national brand of education quality
- improves the international student pre-enrolment experience



### RECOMMENDATION TWO

Reorganise the education agent training scheme to increase access and engagement

In collaboration with the British Council, education agents and stakeholders, explore restructuring the British Council Education Agent training suite so that a base level of content is offered for free to education agents, thereby raising the standard of UK education agent counselling globally. The prestige of becoming 'Certified' could command a fee (consultation with education agents needed to determine price elasticity of demand) or covered through some kind of provider license. Completion of the program should provide a material benefit to the individual and their company.

The revised training programme should be integrated with Recommendations Two and Three and could be a quality indicator for HEIs under the Good Practice Guide (See Recommendation Three).

#### Benefits of implementing

- greater uptake of the training so better prepared education agents
- provides a benchmark for providers to evaluate new and existing education agent practice
- reassures government about education agent practice
- aligns with the national brand of education quality
- improves the international student pre-enrolment experience



### RECOMMENDATION THREE

Develop and promote a Good Practice Guide for Providers Using Education Agents

Working with education agents and using section 3.3 of this report as a starting point, develop and distribute a good practice guide for providers, which might include:

- recommendations on due diligence, trial periods, training and review processes, including student satisfaction metrics that might be collected on an annual or biennial basis that would feed into the review process (and potentially provide sector benchmarking metrics)
- advice on contract inclusions (potentially template clauses), such as requiring education agents to explain to students that they are funded by HEIs (not fee amounts),
- use of signed agreements with students (particularly in relation to GDPR), and compliance with the Code of Ethical Practice for UK Education Agents (Recommendation One)
- recommendations on how their education agent relationships should be made transparent to prospective students, such as listing contracted education agents on the provider website and a providing a page outlining how they pay education agents
- standardised questions for use in new student surveys to increase student feedback in the education agent review process (and identify non-contracted education agents purporting to represent the provider)
- advice on ways to improve and maintain the quality of the provider-education agent relationship, including putting more provider staff through the British Council Agent and Counsellor Training Suite so that they have a clearer understanding of the operational environment in which education agents operate, and making staff aware of the QAA Quality Code as it relates to student recruitment and admissions practice
- appropriate and legal approaches to sharing information about education agents with other providers and government departments
- an Education Agent Quality Assurance Health Check proforma for internal audit offices that references the relevant sections of the QAA Quality Code and CMA guidance

The Guide would be integrated with Recommendations One and Two.

#### Benefits of implementing

- raises standards of the whole sector in managing education agents (especially useful for newer entrants)
- provides tools for providers to further evaluate and continually improve their education agent management practice
- helps to increase international student feedback and standards of service

## 4.2 RECOMMENDATION CONCLUDING NOTES

The eight elements of the UK's Education Agent Partner Quality Assurance Framework will be delivered by:

Quality Assurance Framework	Issue to solve	Improvement
Legislative Structure	<ul style="list-style-type: none"> <li>Lack of awareness</li> </ul>	<b>Recommendation 2</b> <ul style="list-style-type: none"> <li>Increase education agent and counsellor participation in the British Council Training programme</li> </ul>
Prospective Student Complaints/Rating Channels	<ul style="list-style-type: none"> <li>Lack of awareness</li> <li>Inconsistent approach</li> </ul>	<b>Recommendation 3</b> <ul style="list-style-type: none"> <li>Adoption of best practice by providers outlined in Good Practice Guide                             <ul style="list-style-type: none"> <li>complaints channels</li> <li>standardised feedback questions in new student surveys</li> </ul> </li> <li>Increase awareness through communications plan</li> </ul>
Centralised Communications and Training Scheme	<ul style="list-style-type: none"> <li>Access barriers (cost / time)</li> <li>Low take-up</li> <li>Some negative impressions                             <ul style="list-style-type: none"> <li>Lack of familiarity</li> </ul> </li> </ul>	<b>Recommendations 1-3</b> <ul style="list-style-type: none"> <li>Best practice under Code of Ethical Practice</li> <li>Sector working with British Council to increase education agent access to training scheme</li> <li>Adoption of best practice by providers outlined in Good Practice Guide                             <ul style="list-style-type: none"> <li>Due diligence</li> <li>Review processes</li> <li>contract inclusion</li> </ul> </li> </ul>
Commission Transparency	<ul style="list-style-type: none"> <li>Lack of clarity for students                             <ul style="list-style-type: none"> <li>Official agents</li> <li>Commercial arrangement transparency</li> </ul> </li> </ul>	<b>Recommendations 1-3</b> <ul style="list-style-type: none"> <li>Best practice under Code of Ethical Practice                             <ul style="list-style-type: none"> <li>disclosing commercial relationships to students</li> </ul> </li> <li>Reinforced in BC training</li> <li>Adoption of best practice by providers outlined in Good Practice Guide                             <ul style="list-style-type: none"> <li>publishing official agents on website</li> </ul> </li> </ul>
Information Shared between Home Office and Providers	<ul style="list-style-type: none"> <li>proactive identification of trends and mitigation of poorer practices</li> </ul>	<b>Recommendation 3</b> <ul style="list-style-type: none"> <li>Adoption of best practice by providers outlined in Good Practice Guide</li> <li>Note this is mutual sharing so the Home Office also needs to collaborate with the sector</li> </ul>
Promotion of Official Education Agents (centralised and provider lists)	<ul style="list-style-type: none"> <li>Lack of clarity for students                             <ul style="list-style-type: none"> <li>Official agents</li> </ul> </li> <li>Government / sector wide education agent communications</li> </ul>	<b>Recommendations 2 and 3</b> <ul style="list-style-type: none"> <li>Adoption of best practice by providers outlined in Good Practice Guide                             <ul style="list-style-type: none"> <li>publishing official agents on website</li> </ul> </li> <li>British Council Training scheme adapted to certify individual and/or company</li> </ul>

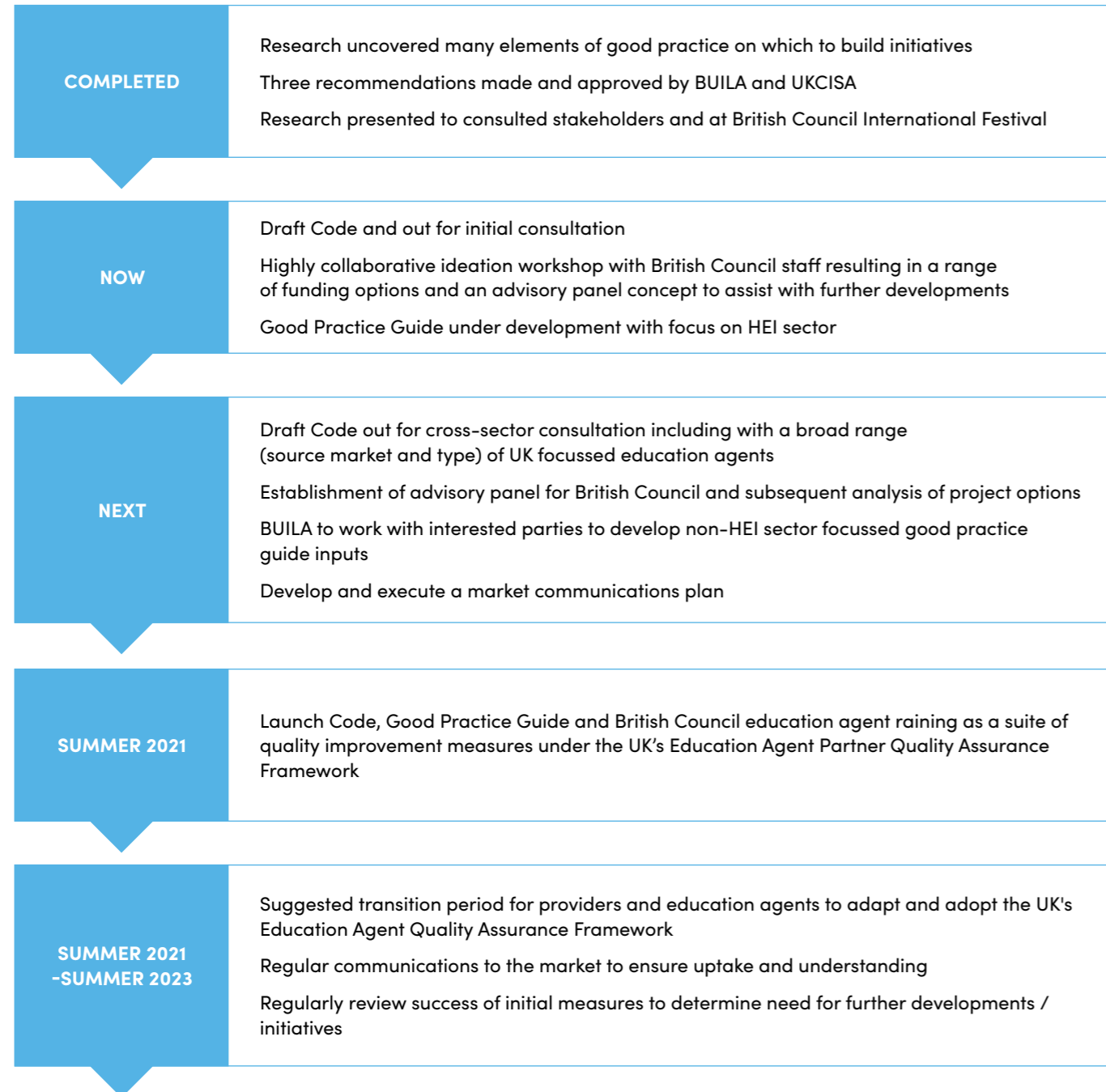
Quality Assurance Framework	Issue to solve	Improvement
National Code of Ethical Practice for Education Agents	<ul style="list-style-type: none"> <li>Lack of awareness of London Statement / and/or BC Good Practice Guide</li> <li>Confusion because of two documents</li> </ul>	<b>Recommendation 1</b>
Provider Good Practice Guide for Working with Education Agents	<ul style="list-style-type: none"> <li>Raise provider agent management standards across UK best practice</li> </ul>	<b>Recommendation 3</b>

- To be effective, the three recommendations need to be developed concurrently and supplemented by an appropriate communications plan to the source markets before they are launched. This will help increase engagement with the process and with UK providers more broadly. It will also help to raise the level of transparency among prospective students helping them to make more informed decisions.
- The use of education agents to recruit international students from within the EU was not covered by this research. Given the new arrangements between the EU and the United Kingdom, it would be advisable to also gather input into the development of the initiatives from a cross section of EU education agents and include them in the dissemination plan.
- A preferred or accredited education agent scheme was considered and remains an option in the future but is unlikely to develop best practice beyond what will be achieved through development and adoption of the three primary recommendations, has the potential to be costly and could possibly even damage the UK's recognised position as the best country to do business with. Further consideration may be worthwhile after the proposed transition and review period.



BUILA and UKCISA set out to clarify the role of education agents recruiting international students to the HEI sector; however, through the recommendation consultation process, it became clear that there is an opportunity for cross-sector adoption. BUILA and UKCISA are committed to engaging, partnering and codesigning with providers from all areas of the UK's international education sector so that the Education Agent Quality Framework is a sector-wide adopted initiative.. This cross-sector approach will strengthen the UK's brand position offshore, is in-line with the UK's International Education Strategy (2021), and could help facilitate government endorsement.

### 4.3 RECOMMENDATIONS ROADMAP



## Edified

BUILA and UKCISA commissioned Edified to undertake the research and author this report. They are now engaged to assist with the implementation of the report recommendations in collaboration with sector stakeholder bodies.

Edified is a specialist education consultancy dedicated to assisting Australian, New Zealand, UK and other European education providers and promoters to significantly improve their ability to build their brands, acquire and retain students, and deliver outstanding student/graduate success.



T +61 414 536 625 | E [oliver@edified.com.au](mailto:oliver@edified.com.au)  
T +44 781 578 0999 | E [chris@edified.com.au](mailto:chris@edified.com.au)  
ABN 68 6232 959 56 | ACN 623 295 956

