

POLICY / PROCEDURE TITLE		DATE OF APPROVAL
NCG International Agent Recruitment and Monitoring Policy		February 2025
APPROVED BY	VERSION NO.	VALID UNTIL
HE Quality & Standards Committee	2	February 2028

OWNER	International Compliance Officer		
GROUP EXECUTIVE LEAD	Deputy Principal (HE)		
DOCUMENT TYPE	Policy <input checked="" type="checkbox"/>	Group Procedure <input type="checkbox"/>	Local Procedure <input type="checkbox"/>
PURPOSE	The purpose of this policy is to outline NCG's responsibilities in the management of educational agents who recruit international students. It covers agent activities and responsibilities for recruiting international students to ensure NCG only works and engages with reputable agents.		
APPLICABLE TO	All NCG employees, as well as consultants, vendors, agency workers.		
EQUALITY ANALYSIS COMPLETED [POLICIES ONLY]	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	N/A <input type="checkbox"/>
KEY THINGS TO KNOW ABOUT THIS POLICY	This policy is in place to ensure that staff are aware of the NCG's expectations in relation to the recruitment and management of agents.		
EXPECTED OUTCOME	Readers are expected to understand the organisational position and know their responsibilities in relation to the policy and comply with the terms of the policy.		

MISCELLANEOUS	
LINKED DOCUMENTS	<ul style="list-style-type: none"> International Admissions Policy NCG UKVI Compliance Policy
KEYWORDS	<ul style="list-style-type: none"> International agents Training Performance Review

Equality Impact Assessment

EQUALITY IMPACT ASSESSMENT			
	Yes	No	Explanatory Note if required
EIA 1 - Does the proposed policy/procedure align with the intention of the NCG Mission and EDIB Intent Statement in Section 2?	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The answer to this must be YES
EIA 2 - Does the proposed policy/procedure in any way impact unfairly on any protected characteristics below?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
Age	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Disability / Difficulty	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Gender Reassignment	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Marriage and Civil Partnership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Race	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Religion or Belief	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sex	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
Sexual Orientation	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA3 - Does the proposed policy/processes contain any language/terms/references/ phrasing that could cause offence to any specific groups of people or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA4 - Does the policy/process discriminate or victimise any groups or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process positively discriminate against any group of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this must be NO
EIA 5 - Does this policy/process include any positive action to support underrepresented groups of people, or individuals?	<input type="checkbox"/>	<input checked="" type="checkbox"/>	The answer to this could be yes or no as positive action is lawful. However, an explanation must be provided for clarity.
EIA 6 - How do you know that the above is correct?	This is 'reality check' question to ensure that this is not a simple box ticking exercise. A simple way of ensuring that this is the case is to ensure that the policy/process author has consulted with peers and appropriate groups of people in the Group. As a general rule, the wider the reach and potential impact of the Policy the wider the consultation.		

1. GENERAL POLICY STATEMENT

This procedure outlines NCG's responsibilities in the management of educational agents. It covers agent activities and responsibilities for recruiting international students to ensure NCG only works and engages with reputable agents.

NCG is licenced to sponsor international students under the Student visa route. NCG has a track-record of compliance and is committed to being fully compliant with all Sponsor responsibilities. Educational agents are expected to play their role in ensuring that the admission of international students complies with these regulations and that only fully qualified and credible students are referred to NCG. NCG also expects that its agents will be compliant with all other aspects of UK Government regulation related to the operation of a business in the UK.

NCG takes all reasonable measures to use educational agents that have an appropriate knowledge and understanding of the UK international education sector and related Government guidance. Agents should also have a good working knowledge of NCG and Newcastle College, its status as a higher education institution, its structure, and its academic portfolio.

NCG expects that its contracted agents will adhere to the standards set out by the National Code of Ethical Practice for UK Education Agents.

2. COMPLIANCE

Educational agents must have detailed knowledge of (and be compliant with) UK Government guidance on the Student Route and/or Short-Term Student Visa (STSV) routes:

- [Student Route Visa Guidance](#)
- [Short Term Student Visa Guidance](#)

3. RECRUITMENT OF NEW AGENTS

Prospective educational agents are identified via several channels. These include participation at education fairs and active recruitment in specific regions aligned to NCG's priority markets as outlined in the International Operational Plan.

Following the identification of a new educational agent, the relevant International

Development Officer (IDO) will set up a meeting with the agent to confirm that their services are suitable and align to the educational offer at NCG. An agenda of the points to be covered at the initial meeting is available at Appendix A.

If the IDO is satisfied with the responses from the agent in the initial meeting, they will then request that the agent completes and returns the Prospective Education Agent Questionnaire (Appendix B) and submits supporting evidence including financial statements for the previous two years.

The educational agent must provide details for two references. Agents who intend to recruit for the Student Route should provide references from two other UKVI Student Sponsor institutions. Agents who only intend to recruit Short Term Students or Visitors (not sponsored via the UKVI Sponsor License) can provide references from other Education providers.

References that do not fully answer all of the questions will be rejected, pending a request for more detailed information. The IDO is also encouraged to seek additional information from their recruitment networks.

When fully completed references are received the IDO must then consider all of the information available to them to assess the suitability of the agent and whether they are compatible with the needs of NCG. For the avoidance of doubt, market exclusivity will not be considered for any agent. The IDO will make this clear to the agent at the start of the sign-up process.

If the IDO is satisfied that working with the agent would be of benefit to NCG, the IDO should supply all relevant documentation to the Head of International, and in the case of Student Route agents, the file should also be submitted to the NCG International Compliance Officer.

The Head of International will refer the financial statements to the NCG Head of Finance for review. Following review, the NCG Head of Finance will confirm to the Head of International and NCG International Compliance Officer if the approval

process can continue or not, or if further information is required. The Head of International will then approve or reject the agent application for non-Student Route agents.

For agents applying to refer Student Route applications, the Head of International and the NCG Compliance Officer will meet to discuss the application. Criteria to be considered includes the experience of the agent in UK HE and/or FE recruitment; number of existing agents in the territory; specialisms; likely courses of promotion; knowledge of the Student Route and history of compliance.

If the Head of International and NCG Compliance Officer cannot come to an agreement on whether to approve or reject the agent, the paperwork will be referred to the Deputy Principal HE for a final decision.

Approved paperwork will then be passed to the International Finance and Administration Co-Ordinator who will liaise with the NCG contracts team to issue the approved contract paperwork and arrange signatures. The contracts team will CC the Head of International and the International Finance and Administration Co-Ordinator on all international agent contracts. The contract will be signed by a member of the NCG Executive team and the Director of the Agency. The contract will commence on the date that both parties have signed.

4. AGENT TRAINING

Following issuance of the contract, the following documents will be provided as an induction pack to each new agent:

- USPs for NCG and Newcastle College.
- Undergraduate Prospectus.
- Postgraduate brochure.
- EFL brochure (if applicable).
- Relevant Level 3 course information sheets (if applicable).
- International Admissions handbook for agents.
- Newcastle College International Admissions Policy.
- NCG UKVI Compliance Policy.

- NCG International Student Attendance Policy.
- NCG English Language Policy (UKVI Student Sponsorship).

A training session will be organised by the recruiting IDO, ideally within two weeks and no more than four weeks, after the contract has been signed by both parties. The session will cover; an overview of Newcastle College and NCG and associated USPs provided by the IDO; an overview of Newcastle College's admissions process provided by the International Admissions Manager; and an overview of NCG's expectations in relation to UKVI Student Sponsorship provided by the NCG International Compliance Officer.

Following the initial training the IDO will agree an initial set of targets with the new agency and will monitor progress against these targets. IDOs will provide an annual product knowledge update every April on course changes, fees and accommodation availability. Ongoing updates to agents will also be provided by IDOs on a rolling basis as and when new information becomes available. The NCG Compliance Officer will also send a compliance/UKVI update on an annual basis in the month of April (in line with typical immigration rule updates) and will work with IDOs to communicate policy changes to the agent network as necessary.

5. AGENT MANAGEMENT AND PERFORMANCE REVIEW

IDOs are responsible for the day-to-day management and interaction with the agent network. As part of their induction IDOs will be given training on how to manage their agent network and what the expectations are as outlined in the agent handbook. Annual refresher training will be provided for the IDOs by the Head of International at Professional Development Days.

The following activity will be undertaken to support IDOs with agent performance reviews;

- **Initial Period reviews**

The contract includes an Initial Period of six months. On satisfactory conclusion of the Initial Period, NCG will extend the contract for a further Fixed Period of 18 months. At the five month point, the IDO will request the

admissions statistics and anecdotal information from the International Admissions Manager and will complete the Initial Period paperwork in Appendix C. The completed paperwork will then be submitted to the Head of International and NCG Compliance Officer for review. Following the Initial Period review, the IDO will provide feedback to the agent and any training or support required. If the agent performance is not acceptable, the contract can be terminated by the College at any time during the Initial Period giving notice of one week. Instances where a contract may be terminated are included in the agent contract.

- **Post-intake reviews**

The International Compliance Officer will meet with the Newcastle College International Office team after each main intake (February, July, and October) to review agent performance.

Points considered will include the number of applications, conversion rate, number of CAS issued, number of refusals and any anecdotal information from the team regarding the agent's performance and conduct.

UKVI compliance training, admissions training and/or product training will be delivered to agents by the relevant staff member where a need is identified.

- **Annual financial reporting**

The International Finance and Administration Co-ordinator will provide annual data to the Head of International and the International Compliance Officer on tuition fee income generated by each agent's student recruitment. This should be submitted no later than 31st August each year. The data will inform planning for the following academic year. The data will then be compiled into a formal report by the International Compliance Officer and submitted to the Authorising Officer.

If an agent has failed to submit a student application for more two-years, the agent will be logged as 'Inactive' and will no longer be subject to the training and monitoring process. If the agent contacts NCG/Newcastle College after this two-year period with a view to re-establishing the relationship, the contract will be reviewed by the Head of International and the International Compliance Officer

and a decision will be made as to whether to reinstate the agent as 'Active'.

Before an agent can be reinstated, the agent must complete the training outlined in Section 4 of this policy.

6. STATEMENT ON IMPLEMENTATION

Upon approval, this policy will be uploaded to the policy portal and communicated to staff via The Business Round-Up.

7. STATEMENT ON EQUALITY AND DIVERSITY [POLICIES ONLY]

NCG is committed to providing equality of opportunity. Further details of our aims and objectives are outlined in our [Equality Diversity Inclusion and Belonging Strategy](#).

This policy has been assessed to identify any potential for adverse or positive impact on specific groups of people protected by the Equality Act 2010 and does not discriminate either directly or indirectly. In applying this policy, we have considered eliminating unlawful discrimination, promoting equality of opportunity and promoting good relations between people from diverse groups.

8. STATEMENT ON FREEDOM OF SPEECH

NCG is committed to upholding the principles of freedom of speech as enshrined in UK law. This policy is designed to ensure that all members of our college community, including students, staff, and visitors, can express their views and ideas freely and without fear of censorship or reprisal, provided that such expressions are within the law.

We affirm that this policy does not, in any way, diminish or undermine the rights of individuals under existing Freedom of Speech legislation.

9. STATEMENT ON CONSULTATION

This policy has been reviewed in consultation with:

All International Office Staff

Head of International

Deputy Principal HE, Authorising Officer
NCG HE Quality and Standards Committee

Appendix A – Agent initial meeting agenda

The recruiting International Development Officer (IDO) should use the below agenda items as a basis for the first meeting with the agency.

1. Overview of agency, including but not limited to;

- When was the agency was established?
- Who are the owners / directors?
- What is the structure of agency?
- How many staff work for the agency?
- Does the agency work with sub-agents? How many?
Does the agency they have business premises for student counselling and interviews?

2. Overview of Recruitment practices, including but not limited to;

- Which countries does the agency recruit from?
- How many other UK institutions is the agency contracted with and actively recruiting for?
- Does the agency charge students for their services? What does the fee cover?
- In addition to student recruitment does the agency offer any other services?
- Which courses does the agency typically recruit for?
- Will the agency be focusing on Student route recruitment or Short-Term-Student recruitment, or both?
- Does the agency attend any international conferences?
- Does the agency have links with any specific government departments or recruit sponsored students?
- Does the agency have a documented process for dealing with student complaints?
- How does the agency ensure the quality of counselling services for students?

3. Working with Newcastle College, including but not limited to;

- Why does this agency want to become a partner of Newcastle College / NCG?
- How does Newcastle College / NCG fit into the agency's portfolio of existing clients?
- Which courses does the agency intend to recruit for?
- What support does the agency need from Newcastle College to be successful?

End of Appendix A

Appendix B – Prospective Agent Questionnaire



**NEWCASTLE
COLLEGE**
UNIVERSITY
CENTRE

1. Agency Details

Company Name:	
Company Owner:	
Title of Company Owner:	
List of all Owners/Directors: (Please provide an Organisational Structure)	
Main Business Address:	
Owner Telephone:	
Owner Email:	
Company Website:	
Alternative Contact Name:	
Title of Alternative Contact:	
Alternative Contact Telephone:	
Alternative Contact Email:	
Details of Branch Offices, please list the City, Country, Date Established and Number of Staff for each branch	

2. Recruitment Activity

When was your company established?	
Which countries are you mainly recruiting from?	
Name of top source country:	
Total number of students recruited to the UK in the last 12 months from top source country:	
Foundation Degree:	
Undergraduate Degree:	
Postgraduate Taught:	
English as a Foreign Language:	
Other:	
Visa approval rate:	

Name of second source country:	
Total number of students recruited to the UK in the last 12 months from top source country:	
Foundation Degree:	
Undergraduate Degree:	
Postgraduate Taught:	
English as a Foreign Language:	
Other:	
Visa approval rate	
Which other countries do you recruit students from? Please list:	
Please list all of the UK institutions you are currently contracted with:	
Please list three UK partners with recruited student numbers for the last 12 months	
1.	
2.	
3.	

3. Staff Training and Expertise

Have any of your staff completed the British Council UK Agent and Counsellor Training? Please list names and dates certified:	
Have your staff attended any other UK focussed training, particularly relating to the Student Route? Please detail the name of the provider and the date of the training:	
Have your staff been trained to understand the National Code of Ethical Practice for UK Education Agents? Please provide dates of training:	

1. Working with Newcastle College, NCG

How will you position Newcastle College in your operating markets?	
How many students do you estimate you will be able to recruit for Newcastle College in the first 12 months?	
Which courses do you intend to recruit for? Please list:	

Do you charge your Student Clients a fee for your services? If yes, what do you charge and what does this fee include? Please detail:	
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2. References – Please provide the details of two UK Student Route institutions who have consented to be your referees:

Referee 1	
Title:	
Name:	
Position:	
Email Address:	
Phone number:	
Institution name:	
Number of years working together:	

Referee 2	
Title:	
Name:	
Position:	
Email Address:	
Phone number:	
Institution name:	
Number of years working together:	

3. Additional Evidence

Please provide evidence of your company's financial solvency:	
Please provide a list of your company staff:	

4. Declaration

I/we declare that the information provided is true and correct to the best of our knowledge and that we have written consent to put forward our referees.

Yes/No (please delete)

Please return this questionnaire along with your organisational structure, company profile and evidence of your company's financial solvency to international@ncl-coll.ac.uk

End of Appendix B

VERSION CONTROL				
Version No.	Documentation Section/Page No.	Description of Change and Rationale	Author/Reviewer	Date Revised
2	Page 4	Reference to the National Code of Ethical Practice	CB	13/02/25
2	Page 6	Further clarity that updates/training will be provided when policy changes occur	CB	13/02/25