

International Agent Recruitment and Monitoring Procedure

<u>Policy Title</u>	International Agent Recruitment and Monitoring Procedure
<u>Policy Category</u>	Compliant
<u>Owner</u>	International Compliance Officer
<u>Group Executive Lead</u>	Chief Operations and Compliance Officer
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<u>Freedom of Information</u>	This document will be publicly available through the Groups Publication Scheme.
<u>Review Date</u>	March 2024
<u>Policy Summary</u>	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.

<u>Applicability of Policy</u>	<u>Consultation Undertaken</u>	<u>Applicable To</u>
Newcastle College	Yes	Yes
Newcastle Sixth Form	N/A	No
Carlisle	N/A	No
Kidderminster	N/A	No
Lewisham	N/A	No
Southwark	N/A	No
West Lancashire	N/A	No
Professional Services	Yes	Yes

<u>Changes to Earlier Versions</u>	
<u>Previous Approval Date</u>	<u>Summarise Changes Made Here</u>
	N/A

<u>Linked Documents</u>	
<u>Document Title</u>	<u>Relevance</u>
International Admissions Policy (NCL)	Covers admissions procedure which agents should follow.
NCG UKVI Compliance Policy	Underpins UKVI compliance requirements which agents should follow.

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1. Intent

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 committed to being fully compliant with all Sponsor responsibilities and 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. 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.

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 Licence) can provide references from other Education providers.

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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 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 Chief Operations and Compliance Officer and 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.
- Post-graduate brochure.
- EFL brochure.
- Relevant Level 3 course information sheets.

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- 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 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.

IDO's 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.

5. Agent Management and Performance Review

IDO's 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

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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 paragraph 4.1 of this policy.

6. Related Policies & Procedures

This procedure should be read in conjunction with following policies / procedures:

- International Admissions Policy.
- NCG UKVI Compliance Policy.

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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

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Appendix B – Prospective Education Agent Questionnaire



Prospective Education Agent Questionnaire

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?	

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Country 1

Number of students recruited to the UK in the last 12 months for:	
Foundation Degree	
Undergraduate	
Postgraduate taught	
English as a Foreign Language	
Other	
Visa Success Rate	

Country 2

Number of students recruited to the UK in the last 12 months for:	
Foundation Degree	
Undergraduate	
Postgraduate taught	
English as a Foreign Language	
Other	
Visa Success 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 detailing the partner name, years contracted and number of students recruited for each.	

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3. Staff Training and Expertise

<p>Have any of your staff completed the British Council Agent and Counsellor training? Please list names, level and dates certified.</p>	
<p>Have your staff attended any other UK focused training particularly relating to the Student Route? Please detail including the name of the provider and date of the training.</p>	
<p>Have staff been trained to understand the National Code of Ethical Practice for UK Education Agents? Please provide dates of training.</p>	

4. Working with Newcastle College, NCG

<p>How will you position Newcastle College in your operating markets?</p> <p>How many students do you estimate you will be able to recruit for Newcastle College:</p>	
<p>Which courses do you intend to recruit for? Please list.</p>	
<p>Do you charge your Student Clients a fee for your services? If yes, what do you charge and what does this fee include?</p>	

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5. 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	

6. Additional Evidence

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

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

Appendix C – Initial Period Review

Initial Period review meeting record

Date: DD/MM/YYYY

Purpose

The purpose of the meeting is to review the performance of the Agent during the Initial Period and to give all key staff the opportunity to raise any concerns about the performance or conduct of the agent. This will inform the decision of whether or not to extend the agreement to include the fixed period. Staff are required to use the below form to give feedback on the agent performance prior to the Initial Period end date. Feedback is required from all members of staff listed on the form. If feedback is not available the reason why should be input below.

Agent name	
Contract commencement date	
Initial Period end date	
Applications submitted during Initial Period (Academic / EFL)	** Academic ** EFL
Conditional Offers issued during Initial Period (Academic / EFL)	** Academic ** EFL
CAS issued during Initial Period	
Student Interviews	Successful interviews: 2 nd interviews: Rejected at interview:
Conversion % offer to enrolment	
Visa refusals during Initial Period	
Enrolments during Initial Period	

Staff feedback please add comments and / or concerns	
<p>International Officer (Admissions) The International Officer (Admissions) should collate the feedback of all admissions team members and record here.</p>	
<p>International Development Officers Both IDOs should give feedback where appropriate. If one IDO has no dealings with the agent please state this on the form.</p>	

<p>International Finance and Administration Co-Ordinator Detail any issues regarding paperwork / payments etc</p>	
<p>Summary of discussion between Head of International and NCG Compliance Officer</p>	
<p>Extend agreement to include Fixed Period?</p>	<p>Yes / No Include relevant date:</p>
<p>Approved by</p>	
<p>Date</p>	

End of Appendix C

Appendix D – Commission Payment Process

1. Commission is only payable where there is evidence on the student file that the agency either submitted the application or is documented as officially representing the applicant.
2. At the point of enrolment, the student information is recorded on the 'Commission Records' spreadsheet by the International Finance Co-Ordinator who calculates how much commission is due to the agent. The calculation is based on a percentage of the fees due as outlined in the agent contract.
3. Commission is payable to the agent when fees are received by NCG. If the student has an instalment plan or has financial sponsorship, the commission is paid in instalments as the balance is cleared.
4. Payments to a UK bank account are paid via the Purchase Order system. The International Finance Coordinator raises the Purchase Order for the full amount which is approved by the Head of International.
5. Payments to an International bank account are paid outside of the Purchase Order System using the Agent Commission Payment document supported by an invoice.
6. Before a payment is made, the Finance Coordinator completes the Agent Commission Payment document which shows the breakdown of payments for each student. The Agent Commission Payment document is then sent to the Head of International along with the invoice to check for inaccuracies.
7. The Head of International checks for inaccuracies and then approves the total amount of commission due.
8. On approval the International Finance Coordinator receipts the Purchase Order and sends to the Accounts Payable email ap@ncgrp.co.uk for payment along with a copy of the invoice.
9. The 'Commission Records' spreadsheet is then updated to record the amount paid and the amount still outstanding if applicable.

End of Appendix D

Appendix E – Storage and access of records

1. Agent files will be stored in the International shared area which is accessible by the International team. Link below:

<\\sadfspublic01.admin.ncl-coll.ac.uk\shares\International\Recruitment\Agents\Active>

2. Files will be stored by Agency name.
3. Agent files will include all completed sign-up paperwork including the following:
 - Agent Questionnaire
 - Company profile
 - Completed references
 - Signed contract
 - Any other documents collected as part of the sign-up process.

End of Appendix E