



# International Agent Policy and Code of Conduct

## Scope and Purpose

This Policy defines the criteria and procedures for appointing and managing Recruitment Agents for applicants for taught undergraduate and postgraduate courses and postgraduate research courses and associated sub-degree and pre-sessional courses.

This framework aims to ensure that Kingston University staff and our education agents act with professionalism and integrity in representing the University and comply with all relevant internal and external regulations. It covers any international recruitment agent contracted to represent the University and Kingston University staff who work with them.

This framework forms part of our commitment to the Agent Quality Framework, which the University signed in January 2024. The Code of Conduct follows closely the existing [Guide to good practice for education agents: Partnering for Quality](#), and [The National Code of Ethical Practice for Education Agents](#) as published by the British Council - which should be read in conjunction with this Code.

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

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

## Code of Conduct

The following principles serve as a code of conduct for agents appointed by Kingston University London:

- Agents representing the University must act with integrity at all times, upholding the reputation of both the University and the profession. We expect agents to be dependable,

professional, honest, and trustworthy in their interactions with students. This overarching principle underpins all other expectations and applies to every aspect of an agent's work.

- Agents must promote both themselves and the University in a professional and ethical manner, adhering to best practices. The University requires agents to demonstrate ethical conduct and high standards of professionalism. Best practice entails avoiding any actions that could damage the reputation of the University or the UK higher education sector. Agents should also continually assess and improve their performance.
- Agents must provide accurate and honest information in all forms—published, verbal, or otherwise—about themselves and the University. They must not knowingly, or through neglect, share false, incomplete, or misleading information. This includes details about facilities, admissions, entry requirements, course content, fees, and living costs. All claims made about the University, students, or the agent must be verifiable by the University or relevant bodies such as UK Visas and Immigration. Agents must ensure that the information they provide aligns with guidance from the UK Competition and Markets Authority regarding consumer protection laws.
- Agents must supply potential students with sufficient and accurate information to enable well-informed decisions. They must not omit any material facts that could mislead. The unintentional sharing of incorrect or incomplete information may still be regarded as a lapse in professional standards, unless compelling evidence proves otherwise.
- Agents must promote both themselves and the University in a fair, ethical way. They must avoid negative, misleading, or unfair comparisons with other institutions and refrain from using unethical tactics to harm the reputation of competitors.
- Agents must prioritize the welfare of both students and the University. They are expected to provide students—and, where appropriate, their parents or sponsors—with advice and information in accordance with this principle.
- Agents must operate in full compliance with the laws, regulations, and official policies in the countries where they conduct business.
- Agents must maintain transparency and openness in all dealings with the University.
- Agents are required to comply with the University's obligations under the UK Bribery Act of 2010. Breaches of the agent contract may result in immediate termination of the agreement.
- Agents should support and invest in the ongoing training and professional development of their counselling staff to ensure up-to-date knowledge of the UK education system, its institutions, and visa and immigration regulations.

**Agents representing Kingston University London must never:**

- Assist with applications for students who do not meet visa requirements or suggest that student visas can be used for purposes other than full-time study.
- Support applications that involve fraudulent documentation.
- Provide immigration or migration advice unless legally authorized.
- Make financial promises regarding discounts or scholarships.
- Guarantee offers or admission outcomes that conflict with university admissions or data protection policies.

## Selection Criteria

The following criteria are used when considering a new international education agent for appointment:

- We appoint representatives who have specialist counselling staff who are familiar with UK higher education and UCAS / direct application processes and have a high level of knowledge of UK visa application process.
- We expect our agents to be reliable, professional, and trustworthy providers of advice to students.
- We look for representatives who represent good quality institutions and have a strong reputation in market. We require 2 references from colleagues and peers before appointment.
- Agents must hold appropriate business registration with due regard to the regulatory conditions in the market(s) in which they operate. They shall comply with all applicable national laws, regulations, and official policies.
- We appoint representatives with professional facilities and staff. For those agents offering online services only, we look for high quality infrastructure and processes, and breadth of access to the market, as well reviewing the in-person support services that may underpin their virtual offering.
- We generally appoint representatives based in country, and whose staff have local knowledge and language skills and who can support with additional add-on services such as; pre-departure briefings, visa advice, translation at fairs, information on their website and help with translating University marketing materials.
- We will usually limit the number of agents in a country proportionate to the size of the student market and geographic size of the country. This ensures Goldsmiths is able to adequately support and service our agents.

## Selection Process

- Agent approaches International Office and sends their proposal.
- Regional Manager/International Officer reviews information and decides whether to proceed with the formal questionnaire.
- Questionnaire completed by representative and returned to Regional Manager/International Officer.
- Regional Manager/International Officer considers questionnaire in context of their market knowledge and experience.
- Regional Manager/International Officer follows up references by email/phone and undertakes any other appropriate due diligence (contact British Council, local contacts, other universities, etc)
- Decision is made whether to appoint representative.

## Appointment and Contractual Arrangements

The contractual agreement between the University and the international education agent will detail as a minimum:

- Appointment date and duration
- Activities, Rights and Obligations of the Representative
- Rights and Obligations of Kingston University London.
- Monitoring and review arrangements to ensure obligations are fulfilled.
- Legal obligations, including consumer rights, data protection and anti-bribery legislation.
- Confidentiality
- Legal jurisdiction under which any disputes would be resolved.
- Termination
- Financial Provisions including commission.

The agent's work will be monitored throughout the duration of their agreement and may be terminated at any time if the agent is found to be in breach of the terms of the contract. Contract templates will be regularly reviewed by our Governance and Legal services department, typically every two years, to ensure that they comply with latest legislation and good practice. Each party agrees to act in accordance with all local legislation and regulations of the operating territory and to act in accordance with the terms and conditions of the agent agreement and related policies published on the University website.

## Management of Agent

Kingston University will provide agents with up-to-date information through bespoke agent communications and relevant training. This includes newsletters, face to face training, digital engagement, familiarisation visits and opportunities to engage with admissions and academic departments.

The main person of contact for each agent will be the relevant Regional Manager/International Officer within the International Recruitment Team

Regional Managers/International Officers in the International Recruitment team will be responsible for day-to-day communication with, and management of, appointed agents. The agent's performance will be reviewed throughout year by the University, with emphasis on:

- Quality, volume and diversity of applications and enrolments
- Quality of student counselling
- Professionalism in dealing with the University and students.
- Quality of any recruitment and marketing activities undertaken jointly with the University

Student feedback on the service provided will be sought and considered, along with feedback from Kingston University admissions, CAS and Visa Team and academic departments. Where there is under-performance, mitigation will be undertaken as part of the ongoing review process. At the discretion of the University, any actions that are in breach of the agent contract or likely to bring the University into disrepute will result in the immediate termination of the agent's contract.

# Working Practice/Services Provided

## Responsibilities of the International Education Agent include:

- That the University will be promoted in a professional and ethical manner.
- That the actions of the agent shall not be harmful to the reputation or wider activities of the University in the territories in which the agent operates.
- That applications submitted by the agent will be genuine and complete at the time of application.
- At all times, representatives will act with integrity in the best interests of the student and the University.
- That information given to students in representing the University is accurate and up to date.
- Up to date UK visa advice and guidance to applicants.
- Source of local information for parents, to include generic UK education promotion.
- Advertising and PR in local media/websites and social media sites.
- Facilitate interviews.
- Advise on education qualifications and local institutions and access to local education institutions and school networks.
- Provide market intelligence and insights.
- Organise student road shows and / or small-scale education fairs.
- Staffing and assistance at education fairs.
- Translation services.
- The agent will participate in any training provided by the University and ensure they are familiar with all the information provided relating to the University and its courses.
- The agent will undertake not to exaggerate or overstate any information on the University.
- The design, text and any data of any publicity prepared by the agent, which refers to the University, is to be submitted for university approval before it may be used. Copyright, logo and trading rights on all material shall remain vested in the University and may not be used by the agent without university permission.
- The agent will assist, support and give guidance to the applicants wishing to follow a course at the University, and will assist their applicants from enquiry/application to the issue of a CAS statement (where appropriate) and until they register at the University.
- The agent will be required to keep a record of a student from initial contact to the final action on the application. This should include details of any financial transaction.

## Responsibilities of Kingston University London include:

- Appoint a dedicated member of staff within the International Recruitment team to respond to queries in a timely and professional manner.
- Process agent generated applications in line with published processes and timelines and supporting agents with the application process where appropriate.
- Provide regular information updates, training, and materials to agents in support of their work.
- Include the agent details on the country webpages.
- Support the agent with respect to supply of content and materials for advertising and exhibitions.

- Liaise with admissions about the eligibility of applications and assisting in other areas of conversion from application to enrolment.
- Regular visits, in-office / London based training sessions and familiarisation trip opportunities.
- The University will address any complaint against the agent, and a zero-tolerance policy will be followed.

## Commission

- The University pays commission to contracted agents for new students recruited onto full degree programmes. This does not include students progressing from a UG degree to PG degree at Kingston.
- When two contracted representatives claim commission for the same student, payment of commission/rate of commission is at the discretion of the University and may be split between the 2 parties.
- The University does not pay commission to agents for any students studying on a UK based foundation programme run through one of our contracted partners.
- Any hospitality provided by the International Recruitment Team to agents is guided by the regulations laid out in the Corporate Bribery Act: <https://www.lawsociety.org.uk/topics/regulation/bribery-act-2010> and University Gifts Policy.

In order that commission can be paid in a timely and efficient manner, the agent will:

- Comply with the University's commission process, as set out in the agency contract, specifically in relation to the enrolment of recruited students.
- Comply with the University's commission process, as per the annual commission instruction communicated directly to agents after enrolment each cycle.
- Ensure that commission documentation is complete, accurate and submitted in the correct format.
- Provide extra information as necessary to support claims where dual or multiple claims have been received for the same student.
- Disclose at the earliest opportunity any errors pertaining to commission claims.

## Complaints Procedure

- The University takes all substantiated complaints very seriously and seeks to resolve them in a prompt and fair manner.
- Information on the University's Agent Complaint Process and the Agent Complaint Form can be found on the University [website](#).
- For the University's contracted agents, any concerns or issues should be raised via the relevant International Officer or Regional Manager.

## Performance Review

- 3-year review: sent to representatives by Regional Manager / International Officer before renewing representative agreement.
  - Monitors the representative's effectiveness, conversion activity and feedback on the University.
- 1 year review: sent to representatives once a year.
  - Monitors the representative's effectiveness, conversion activity, and provides feedback on the University, market trends and future recruitment activities by the representative.