

Agent Management Policy

Mae'r ddogfen hon ar gael yn Gymraeg ac yn Saesneg | This document is available in
Welsh and English

CONTENTS

1. Context of Policy.....	2
2. Approval Process	2
3. On-going Agent Management.....	4
4. Agent Performance Appraisal.....	5
5. Agreement Renewal	6
6. Termination/Non-renewal of agent agreements.....	6
APPENDICES.....	6

1 Context of Policy

1.1 Introduction

This policy outlines the agent management procedure for the University of Wales Trinity Saint David. It covers both Home and International agents used to recruit to all University campuses. The University of Wales Trinity Saint David has committed to conduct all agent related activity in conformity with the best practice in agent management as set out in the UK Agent Quality Framework. The purpose of the framework is to:

- Empower student choice and enable informed decision making;
- Ensure good agent governance and professionalism;
- Promote ethical agent practices, professional knowledge and competency;
- Increase transparency and accountability.

1.2 Regulations and Responsibilities

It is the responsibility of the University to establish and operate a robust policy for the management of agent relationships which must be in line with the regulations of the University, UKVI and other Regulatory Bodies including the UK Agent Quality Framework. This policy is also sufficiently flexible as to be responsive to any changes to regulations in future. A full list of all appointed agents will be published on the University website. In addition, the University will provide a list of all appointed agents to UKVI at regular intervals.

Where the University engages agents to act on its behalf in Wales, it will require, through contractual arrangements, that such agents operate in accordance with the University's Welsh Language Standards (no.6) Regulations to ensure compliance with its statutory obligations. This includes ensuring that Welsh-speaking applicants are able to access information, advice, and services in Welsh where required. Further information is available at: www.uwtsd.ac.uk/about/governance-and-management/welsh-language-standards.

1.3 UWTSD Expectations

The appointment of agents in various overseas markets, as well as the UK, requires continuous oversight. Existing and new agents will be informed of the University's expectations in light of the UK Agent Quality Framework.

1.4 Record Keeping

Copies of all agent files are kept securely by the University. Relevant paperwork relating to agent engagement, including email communications, company profiles, registration documents, accreditation by professional bodies, client references, marketing information, training records and applications are recorded in a filing system alongside agent performance reviews. All original agent agreements are retained in the central Corporate Governance records of the University in accordance with general data retention policies.

2 Approval Process

2.1 Identifying Agents

The University receives enquiries from potential agents regularly. This is usually via email contact, but may also come from overseas visits, referrals from University colleagues, trusted contacts from within the HE sector and also cold calling by the agents themselves. Approaches are forwarded to an appropriate University Officer responsible for the relevant campus/country/region; the University Officer is assigned by the Pro-Vice-Chancellor (International). Where the initial enquiry is felt to be of merit, an *Agent Identification Report* (Appendix A) (if applicable) will be completed by the University Officer in relation to three

considerations:

(1) Market alignment

This will be informed by the University's own recruitment strategy, which will be market specific involving localised marketing and recruitment strategies. The University Officer needs to consider the strategy for the market and decide if the agent is well placed to assist.

(2) Agent alignment

The identification and subsequent appointment of agents by market will be in accordance with the University's strategy for that market.

(3) Market Objectives

The strategy will vary according to the market in question. Some markets will be price sensitive, subject specific, rankings focused, and location focused amongst other criteria e.g. availability of Government initiatives/scholarships. In certain markets, the University will be seeking collaborative opportunities too and this will inform agent suitability and consideration.

The University Officer must identify the appropriate level of engagement for each agent as this will determine due-diligence documents (Appendix C). The *Agent Identification Report* (if applicable) and University Officer recommendation will then be considered by the Pro-Vice-Chancellor (International) to decide whether to proceed to the next stage. This may also involve consultation with other appropriate senior managers in reaching a decision.

2.2 Appointing Agents

(1) Complete Application

If the *Agent Identification Report* (if applicable) is approved for further consideration, the agent will then be asked to complete the *Agent Application Form* (Appendix B) as fully as possible in English and return it to the International Office or Home Recruitment Unit respectively.

(2) Due Diligence

In addition to the information provided in the *Agent Application Form* (Appendix B), due diligence will be undertaken by a University Officer with reference to the *Agent Due Diligence Guidelines* (Appendix C).

(3) The *Agent Application Form* and Due Diligence documents will then be considered by the Pro-Vice-Chancellor (International) who may consult with other appropriate senior managers.

(4) Service Provision

If the agent is approved, the roles and responsibilities of the agent will be outlined before terms are discussed and finalised. The role and responsibilities of the agent need to be considered and carefully laid out. For example, territories for student recruitment, campuses and courses open for student recruitment. These are some of the factors which must be decided upon within the service provision.

(5) Agreement terms

Agent agreements are normally issued with standard terms and conditions. However, if appropriate, negotiation of specific Agreement Terms with prospective agents may be undertaken by the relevant University Officer and, where appropriate, senior managers.

(6) Key Performance Indicators (KPIs)

All new and renewed agent contracts will have KPIs contained within them which will be monitored on an ongoing basis and which will form a key part in the regular performance

review process.

(7) Agent Agreements

Once due diligence has been completed and the terms have been agreed, a draft agent agreement is drawn up and forwarded for review to the Pro-Vice-Chancellor (International). Once signed off by the Pro-Vice-Chancellor (International), the agreement will be forwarded to the Vice Chancellor to sign the agreement on behalf of the University.

Appendix E – *New Agent Agreement International*

Appendix F – *New Agent Agreement Home*

Two copies of the agent agreement are issued to the agent along with the *Agent Guidelines and Working Practices Home or International* (Appendix D1 or D2) and a UWTSD Supplier Finance form. The agent will then sign and return the agent agreement and UWTSD Supplier Finance form to the University who will file a copy, send the original to the Corporate Governance department and notify the finance department to set up an account along with notifying the International Office or Home Recruitment Unit. All new agents will be added to the list of approved, active agents held by the University and published on the University website. The list of active agents along with an electronic copy of the agent agreement is kept on the departmental S-Drive.

(8) Training Pack

At this point, the University will send the agent the *Agent Guidelines and Working Practices Home or International* (Appendix D1 or D2) and relevant marketing materials along with the Agent Training Manual (Home or International).

2.3 Rejecting Agents

Should an agent application be rejected by the University, the Agent will be informed by email of the decision by the Executive Head of Agent Partnerships, Recruitment and Admissions and the application will be held in an Agent 'reject file' for future reference.

3 On-going Agent Management

3.1 Agent Induction and Training

Agents will receive induction and training from University staff at the point of receipt of the fully signed agent agreement. Induction and training must take place before the agent submits any applications. Training will take place at regular intervals and can be delivered face to face or via appropriate online platforms such as MS Teams. Agents will be issued with an Agent Training Manual (Home or International) and an Agent Induction and Training Record. Details of training provided will be collated by the relevant University staff member and placed in the agent's file. For newly established agents, sufficient training and close management should be provided in the early stages of operation.

3.2 On-going training

Each visit to the agent's area/country of operation should where possible entail a visit to their offices where training of student counsellors and other student facing staff will occur. Many agents experience high levels of staff turnover and it is, therefore, important that new and existing staff receive regular training from the relevant University Officer. Such training will include changes to University courses, introductions to new programmes, changes in branding guidelines, University requirements, marketing initiatives relevant to their market and changes to UK regulations affecting prospective students. All agents should be made aware of their responsibilities.

3.3 Communication strategies

University Officers are required to keep regular contact with agents, and conduct and write

reviews re all agents either in person or remotely. Copies of these reports will be recorded and retained in the agent files.

3.4 Financial Matters

The precise nature of remuneration for agents may vary from case to case. The precise level of commission will be negotiated at the point of agreement (schedule 1), but other costs may arise such as in relation to in-country marketing events, advertising, travel costs or inward visits to the University. The method of remuneration will be outlined in each agent agreement. If agents incur expenditure outside of these agreed costs and without prior approval, no reimbursement by the University will be provided.

3.5 Marketing and promotions

The University will provide approved international agents with marketing and promotional materials they may require in order to best represent the University in their markets. Any proposed use of this material must first be approved by a University officer. All advertising or other promotional material published by the agent in relation to the University or any of its programmes must have prior, written, approval by the University. Monitoring the use of this material and any other published information by the agent, including the use of social media, will normally be undertaken by an assigned University Officer.

3.6 Managing Issues

The overall management of the agent relationship is the responsibility of the appointed University Officer. Any issues of concern raised by the agent or the University will normally be discussed with the Pro-Vice-Chancellor (International).

Sub-Agents

All agents are required to provide the University with a list of all sub-contracted agents used for student recruitment to the University. Agents are responsible for managing all sub-contracting agents and ensuring they comply with the University's *Agent Guidelines and Working Practices Home or International (Appendix D1 or D2)*. All sub-agents are required to declare their agency name in the "Sub-Agent" field on the online application form.

For UK agents, they are required to ensure all sub-agents have been approved by UWTSD.

4 Agent Performance Appraisal

4.1 Performance Criteria

Key Performance Indicators (KPIs) will be communicated to all agents at the point the initial contract is agreed. These will be monitored monthly, reviewed annually and form the basis for any decision to renew an agreement ahead of expiry.

4.2 Quantitative data

Quantitative data will be analysed at regular intervals against KPIs and other targets outlined in the agent agreement. Analysis may occur daily during peak times in the recruitment cycle.

4.3 Qualitative data

Qualitative analysis will be undertaken throughout the year. The University may also request that new students recruited via agents complete a questionnaire giving feedback on the service provided by their chosen agent and their experience of the application process. This data will be retained by the University and a summary reported to the Executive Head of Agent Partnerships, Recruitment and Admissions as part of each agent's review.

4.4 Data analysis

Analysis of the number of student applications set against the agreed targets/KPIs and the quality of the applications received will be undertaken regularly by the Executive Head of Agent Partnerships, Recruitment and Admissions or in the case of international agents by the Head of International Business Development and reported to the Pro-Vice-Chancellor (International) and this will inform performance reviews.

5 Agreement Renewal

5.1 Application for renewal of agreement

All new and existing agent agreements will be considered for renewal by the Pro-Vice-Chancellor (International). If the Pro-Vice-Chancellor (International) is satisfied with the agent's performance, the agent will be invited to apply for a renewal of the agreement by completing the *Agent Renewal Form (Appendix H)*.

5.2 Re-negotiation

If circumstances justify a change in the terms of an agent's agreement, then a re-negotiation of terms may take place. The Pro-Vice-Chancellor (International) will decide whether the agent's performance merits a change in levels in the due-diligence tables (Appendix C).

5.3 Due Diligence

During the renewal process, the University Officer will analyse the agent's activity over the course of their initial agreement period. In-country events, both online and offline are to be monitored to ensure the University is being represented correctly in line with its brand guidelines and legal requirements with particular emphasis on the most recent Consumer Rights Act 2015. All due diligence records are kept in the agent's file and are available for review.

5.4 Agreement

Upon receipt of a completed *Agent Renewal Form (Appendix H)*, the Pro-Vice-Chancellor (International) may recommend that a new agent agreement may be drawn up and signed by the agent and the Vice-Chancellor on behalf of the University. The duration of each renewal agent agreement will be at the discretion of the Pro-Vice-Chancellor (International).

6 Termination/Non-renewal of agent agreements

If the University decides to no longer work with an agent for reasons which may include, but are not limited to, the following: a serious breach of the agent agreement; non-productive recruitment; refusal to sign a new agent agreement or visa refusals, the Pro-Vice-Chancellor (International), together with the relevant University Officer, will terminate/not renew the agent contract on behalf of the University. Such a decision will be made in accordance with the relevant termination clauses of the agent contract (if appropriate).

APPENDICES

The UK Agent Quality Framework, including:

- [The National Code of Ethical Practice for UK Education Agents](#)
- [UK Agent and Counsellor Training](#)
- [The Good Practice Guide for Providers Using Education Agents](#)
- [The Good Practice Guide for UK Education Agents: Partnering for Quality](#)
- [A Student Guide to Choosing an Education Agent](#)

APPENDIX A – Agent Identification Form
 APPENDIX B – Agent Application Form
 APPENDIX C – Agent Due Diligence Guidelines
 APPENDIX D1 – Agent Guidelines and Working Practices Home
 APPENDIX D2 - Agent Guidelines and Working Practices International
 APPENDIX E - New Agent Agreement International
 APPENDIX F - New Agent Agreement Home
 APPENDIX G - Reference Request Form
 APPENDIX H - Agent Renewal Form

Document version control

Version No:	Reason for change:	Author:	Date of change:
1.1	Annual Review - initial draft for consideration by the Director of Marketing and Communications.	Stuart Robb, Head of Collaborative Partnerships/ Gemma Green, Senior Admissions Officer	13/08/25
1.2	Final version – minor amendments approved by the Director of Marketing and Communications.	Stuart Robb, Head of Collaborative Partnerships/ Gemma Green, Senior Admissions Officer	03/09/25
1.3	Annual Review - initial draft for consideration by the SEC.	David Fitzgerald, Executive Head of Visa Services and Compliance/ Ben Hessenthaler, Executive Head of Agent Partnerships, Recruitment and Admissions/ Gemma Green, Senior Admissions Officer	05/05/26
2.0	Final version approved by the SEC.	David Fitzgerald, Executive Head of Visa Services and Compliance/ Ben Hessenthaler, Executive Head of Agent Partnerships, Recruitment and Admissions/ Gemma Green, Senior Admissions Officer	21/05/26

Current status of Policy: Approved
 Policy applicable to: HE
 Date ratified: 21/05/2026
 Date effective from: 21/05/2026
 For publication: on UWTSD website



Prifysgol Cymru
Y Drindod Dewi Sant
University of Wales
Trinity Saint David