

ARDEN UNIVERSITY QUALITY ASSURANCE DOCUMENT QA 45 – AGENT APPROVAL, MONITORING AND MANAGEMENT PROCEDURE (including PROGRESSION AGREEMENT)

Introduction

The purpose of this document is to provide a set of procedures for the approval, monitoring and management of UK and international agents (and progression agreements) at Arden University. These procedures are designed to ensure that responsibilities are clearly documented and that standards are maintained and enhanced in accordance with Arden University's Regulatory Framework; UK Quality Code, Advice and Guidance: Admissions, Recruitment and Widening Access; and British Council - Good Practice Guide for Education Representatives; and UKVI.

Definition

Agent:

 An organisation who is contracted to recruit students on behalf of Arden University for their undergraduate and/or postgraduate distance learning (DL) and/or blended learning (BL) programmes or apprenticeship provision. An agent is not an academic partner.

Agent arrangements can be either:

 marketing - an organisation which delivers marketing communications and/or acts in an advisory capacity to support student recruitment and/or the progression of students to Arden University programmes.

and/or

referral – an organisation which acts to refer applications or groups of applications to Arden University for admission to a programme of study. Referral agents have no ongoing role in supporting progression and do not publish marketing materials relating to Arden University programmes, unless by prior agreement.

Progression Agreement:

An arrangement where an organisation refers students from a specific programme of study delivered by the organisation for admission to a programme of study at Arden University. Students from the organisation are not guaranteed entry onto an Arden University programme of study. The partner approval procedure for a progression agreement is the same as that for an agent.



The Approval and Management Process

There are nine key stages (please see appendix 1) involved in the approval and management process for agents (and progression agreements), namely:

- 1. Proposal and Initial Commercial Appraisal
- 2. Due Diligence
- 3. Review and Approval by the Senior Quality Manager and Legal Team. If a cause for concern is identified, then the proposal would be forwarded to the Registrar and Chief Operating Officer for review and approval. The consideration and approval of progression agreements will be undertaken directly by Partnership Committee.
- 4. Report to Partnership Committee (acting on behalf of Academic Board)
- 5. Written Agreement
- 6. Update of the Agent Register (and Collaborative and Partnership Register for progression agreements)
- 7. Report to UKVI (if applicable)
- 8. Agent Training
- 9. Ongoing Monitoring and Review

These processes apply to all enquiries from prospective agents irrespective of whether those enquiries are unsolicited or have been elicited either directly or via promotional/marketing activity.

Stage 1. Proposal and Initial Commercial Appraisal

It is the responsibility of Deputy Vice Chancellor International/Director of International Office and Business Development Director, to respectively undertake an initial appraisal of the recruitment opportunity and business case for the international or UK agent appointment (or progression agreement), using QA 45 Agent (Progression Agreement) Proposal Form (please see appendix 2).

The appraisal of agents will include an assessment of:

- scale and nature of business expected to be undertaken; markets, programmes and profile of potential students
- current operations, including location of office(s), number of staff, marketing initiatives and the application advisory service and support
- track record and experience of working with UK HE institutions
- projected numbers



Stage 2. Due Diligence

All agent arrangements (and progression agreements) are subject to a due diligence process, using QA 45 Form 2 – Agent Application Form (inc. Progression Agreements) (please see appendix 3) to ascertain legal and reputational risk. The due diligence of agents will include a review of:

- legal standing (including group structure and beneficial ownership)
- conflict of interest
- owner identity, PEP and sanctions checks
- organisation and professional profile (including website, social media profiles, news and publications)
- understanding of student recruitment in the UK
- business references
- a basic evaluation of premises for UK Agents (only where Arden University branding is requested, and potential students will be entering agent offices)

Any organisation entering into agent agreement with Arden University must be a legal entity operating in accordance with all the applicable laws, statues regulations and codes of the country in which they operate. In the case of an individual operating as a sole trader, that individual must satisfy the necessary laws for sole trader operation within the country in which their business operates. This means that the organisation or person should be registered with the appropriate authorities within their country and operating in accordance with the laws relating to a company or a sole trader.

The organisation must also have permission from the relevant authorities to deliver the services that it is contracted to undertake with Arden University. Appropriate documentation will be sought to evidence the legal standing and stability of the organisation as part of the due diligence. The agent must also declare any conflicts of interest in relation to other partners or individuals working with their organisation.

For UK agents only, additional consideration will be carried out if agent premises are planned to receive potential students on Arden University's behalf and where onsite Arden University branding has been requested. The Senior Quality Manager can decide to conduct a site visit of agent premises (prior to approval) by an appropriate member of staff from Arden University, or a third-party acting on behalf of Arden University. In the case of a third-party, the Registrar and Chief Operating Officer will be consulted to assure that the individual undertaking a site visit, is appropriately qualified and experienced to make a judgment against what would be reasonable expected to maintain Arden University standards.

Stage 3. Review and Approval by the Senior Quality Manager and Legal Team

The Senior Quality Manager (or nominee) and Legal Team will make an appraisal of the proposal and due diligence and decide whether to approve, using the agent Approval Criteria Checklist (please see appendix 4). Approval will be granted where the Senior Quality Manager and Legal Team are assured an agent can deliver a recruitment service at a similar high standard to the University. In the event a cause for concern is identified then the proposal would be forwarded to the Registrar and Chief Operating Officer for a decision.



Where a potential agent is deficient in a certain area of provision and it can be rectified, then advice and guidance will be given to address problem areas within a specified timescale.

The consideration and approval of progression agreements will be undertaken directly at Partnership Committee. A progression agreement will recognise the award a student receives at another organisation but will not guarantee a place onto an Arden University programme. The proposal for a progression agreement will need to outline the academic fit between the organisation and Arden University programmes.

Stage 4. Report to Partnership Committee (acting on behalf of Academic Board)

All agent approval decisions will be reported to Partnership Committee and where required an overview of the proposal and rationale for the decision provided.

Stage 5. Written Agreement

A written agreement will be developed from a University template, with roles and responsibilities clearly set out and agreed before any agent (or progression agreement) arrangement commences. The agreement will be approved by the General Legal Counsel (or nominee) and signed by the Chief Finance Officer. The agreement will include:

- financial details
- minimum student numbers
- legal aspects
- duration period
- expectations and behaviour norms
- approval of marketing collateral (where permission is granted)

The duration of agent agreements will be for three years and extended on a continual basis unless, any cause for concern is identified following ongoing commercial assessments and/or annual monitoring.

Stage 6. Update Agent Register (and Collaborative and Partnership Register for progression agreements)

Once the signed agreement is signed by both parties and saved as a formal record by the Senior Quality Manager (or nominee), the Agent Register will be updated. The Agent Register may also be featured on the University website and will detail the full name of the agent and country of registration. Similarly, the Collaborative and Partnership Register will be updated on approval of any progression agreement.

Stage 7. Report to UKVI (if applicable)

In accordance with para 7.2 Student Sponsor Guidance (Document 2), details of agents assisting with the recruitment of international student to the University's UK study centres will be provided to UKVI via



<u>EducatorsHelpdesk@homeoffice.gsi.gov.uk</u>. The updated list of relevant agents will be submitted to the UKVI each quarter by the Senior Quality Manager (or nominee).

Stage 8. Agent Training

Agents (and progression agreement partners) will be provided with initial training via a Skype or face-to-face session to ensure accurate and effective promotion of the University and agreed programmes. Training will include:

- an overview of the University
- agreed programme information
- entry requirements and documentation
- application submission process
- UK HE regulatory understanding and legal requirements
- where relevant Student Route visa training
- University standards and quality expectations
- approval, review and monitoring processes
- marketing approval process

Agents will also receive on-going training and support from the University via the Agent Guidelines and a dedicated University contact, to ensure the student experience at recruitment meets University standards.

Stage 9. Ongoing Monitoring and Review

Agent agreements will be subject to an annual monitoring review, on the following aspects:

- continued legal registration
- authorisation of written information displayed by agents inc. website, social media and all marketing collateral
- verbal information given by agents on admissions advice via call recording (where possible) or the Student –Recruitment and Onboarding Survey
- agent professionalism with spot checks and third-party activity

In addition, there will be on-going commercial assessment on the following aspects:

- number and quality of applications
- student performance and progression

Similarly, an annual review of progression agreements will be undertaken by the Partnership Committee with explicit reference to student performance and management or termination of the agreement.



Termination

Both the agent and the University are entitled to terminate the agreement at any time during the Initial Term and any Renewal Term by giving not less than one months' written notice to the other party.

Upon termination, the agent will receive a termination letter from the University. The termination letter will request that the agent ceases all marketing and recruitment immediately. Where the University's marketing materials have been provided to an agent, the agent will be asked to ensure that all such materials are destroyed or returned to the University within 7 days of the termination date.

The University will cease to accept any further introductions of prospective student by the agent from the termination date and any remaining commission payments would be subject to the terms of the agreement.

Both the University's and the agent's obligations regarding commission and payment, confidentiality, data protection, indemnification, limitation and exclusion of liability, and insurance shall continue in force following the termination of the agreement.

Arden University may also terminate the agreement with **immediate** effect by giving written notice to the agent if:

- The agent commits a material breach of any term of the agreement which is irremediable or (if such breach is remediable) fails to remedy that breach within fourteen (14) days after being notified to do so;
- The agent repeatedly breaches any of the terms of the agreement in such a manner as to reasonably justify the opinion that its conduct is inconsistent with it having the intention or ability to give effect to the terms of the agreement;
- The agent suffers an Event of Insolvency;
- The agent suspends or ceases, or threatens to suspend or cease, carrying on all or a substantial part of its business;
- There is a change of control of the agent (within the meaning of section 1124 of the UK Corporation Tax Act 2010);
- The agent repeatedly fails to comply with the terms of the Agents Guidelines with respect to responsibilities, restrictions, processes and expected quality of students;
- In the University's reasonable opinion, the agent does anything which brings or could bring Arden
 University into disrepute or does anything which damages or could damage the reputation and
 goodwill of Arden University, or acts in a way that is materially adverse to the interests of Arden
 University.

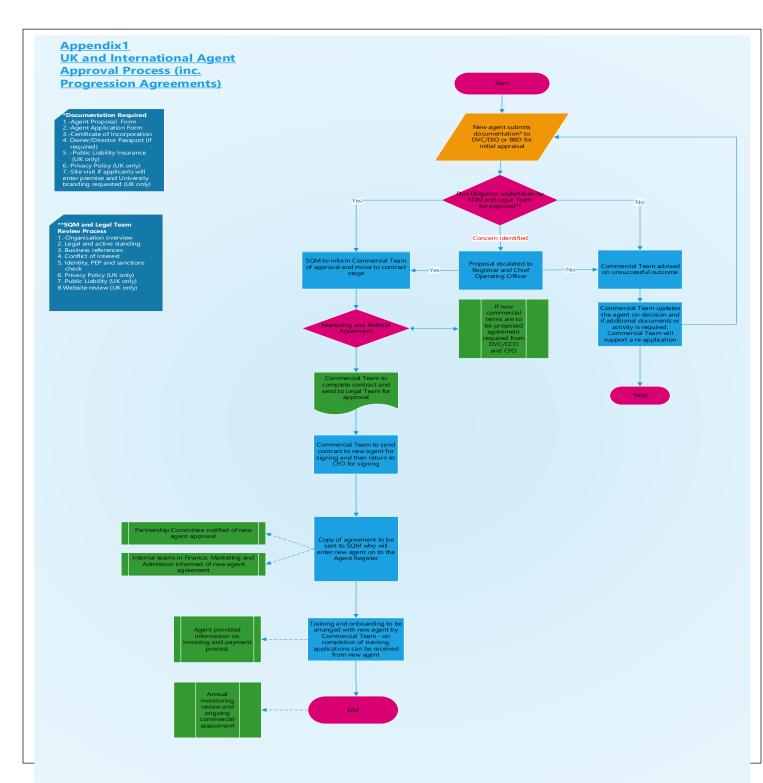


Additionally, where an agent is no longer a valid company or is no longer permitted to trade by law or any certificates or licenses it holds to be a valid company become invalid, the agreement will automatically terminate with immediate effect.

An immediate termination decision would be undertaken by the Registrar and Chief Operating Officer and all relevant stakeholders would be informed. The agent would normally be issued with a termination letter within 24-hours and must cease all marketing and recruitment immediately. An investigation would be undertaken by the University to ensure the appropriate handling of students and areas for resolution. The University would not be under any obligation to share the findings of an internal investigation with the agent.

Similarly, in the event the University or progression agreement partner decide to end an agreement, then the termination would be carried out in line with the terms and conditions of the agreement.







Appendix 2

QA 45 Agent (Progression Agreement) Proposal Form

Troposar Details:				
Proposal nominated by:	Please select:			
	Arden University Director			
	Head of School			
	Other			
	Name: Click or tap here to	enter text		
	Title: Click or tap here to e	enter text.		
Name of proposed	Click or tap here to enter	text.		
organisation:				
Organisation address:	Click or tap here to enter	text.		
	D/ / /			
Type of recruitment to be	Please select:		51 (1114)	
undertaken:	DL (UK and International)		BL (UK)	
	BL (International)		UK-Tier 4, FT	
	Apprenticeship			
Has a site visit been	Please select:			
conducted?	Yes □ No □			
	By whom, please state na	me and titl	e: Click or tap he	ere to enter text.
	Please provide a brief des	-	premise facilites	and standards:
	Click or tap here to enter	text.		
Overview and Rationale for P	roposal:			
Please outline business aims, st	tructure, size and current ac	tivity of pr	oposed organisa	tion
Click or tap here to enter text.				



Please outline rationale for programme(s); progression	•		•	n University,
Click or tap here to enter tex	Kt.			
Please outline target market channels/initiatives, exclusive		or local region; audience	; numbers; planned m	arketing
Click or tap here to enter tex	ĸt.			
Risk and Concerns	altra de talan		-1-1-1-1-1-1-1-C	
Risk Management (please or experience; potential busine				
charged by Agent/sub-agent of Arden University).	; likelihood of	potential students enter	ing organisation prem	ise on behalf
Click or tap here to enter text.				
Overall risk rating:	Low 🗆	Medium □	High □	



Appendix 3

UK Agent Application Form (inc. Progression Agreements)

Please provide a copy of your company certification of incorporation/registered business licence with this form.

By completing this document, you understand and agree that your status as a UK Agent for Arden University is not automatically guaranteed. Arden University must first undertake its due diligence on you and your company. Arden University reserves the right to not enter into an agreement where a UK Agent fails to fulfil University requirements during the due diligence process.

Company Profile:

Company legal registered name as stated on the certificate of incorporation certificate/registered business licence	Click or tap here to enter text.
2. Company trading name	Click or tap here to enter text.
 Is your organisation a limited company/sole trader/ partnership/other (please state) 	Click or tap here to enter text.
4. If you are a sole proprietor or partnership, please provide your tax registration number and a copy of your passport	Click or tap here to enter text.
5. Company registered address as stated on the certificate of incorporation certificate/registered business licence	Click or tap here to enter text.
6. Current trading address (if different from company registered address)	Click or tap here to enter text.
7. If your business is a limited company, please confirm the shareholders names and their percentage of ownership within the business	Click or tap here to enter text.



8. Telephone number	Click or tap here to enter text.	
9. Website address	Click or tap here to enter text.	
10. Social media pages	Click or tap here to enter text.	
11. Key contact details	Full name: Click or tap here to enter text.	
	Job title: Click or tap here to enter text.	
	Phone number: Click or tap here to enter text.	
	Email address: Click or tap here to enter text.	
12. Please confirm all Director	Director 1:	
details	Full name: Click or tap here to enter text.	
	Job title: Click or tap here to enter text.	
	: Click or tap here to enter text.	
	Email address: Click or tap here to enter text.	
	Director 2:	
	Full name: Click or tap here to enter text.	
	Job title: Click or tap here to enter text.	
	Email address: Click or tap here to enter text.	
	Director 3:	
	Full name: Click or tap here to enter text.	
	Job title: Click or tap here to enter text.	
	Email address: Click or tap here to enter text.	
	(please add further fields as required)	
13. Is your company engaged in any other business activities	Yes No	
other than student other trecruitment? If so, please provide brief details: Click or tap here to en		



14. How many staff do you employ for student recruitment and counselling?	Number of staff: Click or tap here to enter text.	
15. Please list all branches/offices that you operate from	Click or tap here to enter text.	
16. Please provide details of any agent accredited training or registration undertaken by your company (e.g. British Council Training, RoAPT or UKVI)	Name of accreditation/training/registration: tap here to enter text. Registration or certificate number: Click or tap here to enter text. Copy of certificate provided:	Click or
	Yes □ No □	
Legal Standing:		
17. Public liability insurance certificate	Does your company have public liability insurance? Yes □ No □ If so, please provide a copy with this form.	
Business Operations:		
18. Do you currently represent other UK higher education	Yes □ No □	
institutions?	If yes, please complete the following details:	
	Name of HE institution:	How many years have you worked together?
	1. Click or tap here to enter text.	
	2. Click or tap here to enter text.	
	3.Click or tap here to enter text.	
	4. Click or tap here to enter text.	



19. Please outline how many students you recruit annually in the UK	For undergraduate study	Enter number here.	For postgraduate study	Enter number here.
	For English Language courses	Enter number here.	For other study (apprentice- ships)	Enter number here.
20. Please state which Arden University study programmes you would recruit for (if 'all', then state this)	Click or tap here to enter text.			
21. Please indicate your estimated recruitment numbers for Arden University annually	Click or tap here to enter text.			
22.Do you charge prospective students?	For an advisory service If so, please state am			ext.
	For application suppo			ext.
23.Please list any other services you offer prospective students	Click or tap here to enter text.			
24.Do you already have any known connections with Arden University?	Yes □ No □ If so, please provide o	details: Click or	tap here to enter	text.



Standards -	UK Reg	ulation:
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25.Do you provide a Privacy Policy, Privacy Notice, Data Protection	Yes □ No □	
Policy or similar to prospective students, or is this available on	If so, please provide a copy with this form or the website link:	
your website?	If not, please outline the data protection measures undertaken by your company: Click or tap here to enter text.	
26.Do you have awareness and knowledge of UK Bribery Act 2010	Yes No	

References:

Please supply the name and contact details of two referees from institutions for whom you act as a Agent in student recruitment (preferably UK HEIs)

	Referee 1	Referee 2
Company name	Click or tap here to enter text.	Click or tap here to enter text.
Contact name	Click or tap here to enter text.	Click or tap here to enter text.
Job title	Click or tap here to enter text.	Click or tap here to enter text.
Address	Click or tap here to enter text.	Click or tap here to enter text.
Telephone Number	Click or tap here to enter text.	Click or tap here to enter text.
Contact Email Address	Click or tap here to enter text.	Click or tap here to enter text.

Thank you for completing this form, please ensure where necessary you include the following documentation:

Company certification of incorporation	Yes □ No □
Agent accredited training certificate (if available)	Yes □ No □
Public liability insurance certificate	Yes □ No □
Privacy policy or website link	Yes □ No □



International Agent Application Form (inc. Progression Agreements)

Please provide a copy of your company certification of incorporation/registered business licence with this form. If your certification or licence is not in English, then please ensure a translated copy (using an official translation service) is provided.

By completing this document, you understand and agree that your status as an International Agent for Arden University is not automatically guaranteed. Arden University must first undertake its due diligence on you and your company. Arden University reserves the right to not enter into an agreement where an International Agent fails to fulfil University requirements during the due diligence process.

Company Profile:

1.	Company legal registered name as stated on the certificate of incorporation certificate/registered business licence	Click or tap here to enter text.
2.	Company trading name	Click or tap here to enter text.
3.	Is your business a limited company/sole proprietorship /partnership or other (please state)	Click or tap here to enter text.
4.	If you are a sole proprietor or partnership, please provide your tax registration number and a copy of your passport	Click or tap here to enter text.
5.	Company registered address as stated on the certificate of incorporation certificate /registered business licence	Click or tap here to enter text.
6.	Company trading business address (if different from company registered address)	
7.	If your business is a limited company, please confirm the shareholders names and their percentage of ownership within the business	



8. Telephone number	Click or tap here to enter text.
9. Website address	Click or tap here to enter text.
10. Social media pages	Click or tap here to enter text.
11. Key contact details	Full name: Click or tap here to enter text.
	Job title: Click or tap here to enter text.
	Phone number: Click or tap here to enter text.
	Email address: Click or tap here to enter text.
12. Please confirm all Director details	Director 1:
details	Full name: Click or tap here to enter text.
	Job title: Click or tap here to enter text.
	Email address: Click or tap here to enter text.
	<u>Director 2:</u>
	Full name: Click or tap here to enter text.
	Job title: Click or tap here to enter text.
	Email address: Click or tap here to enter text.
	Director 3:
	Full name: Click or tap here to enter text.
	Job title: Click or tap here to enter text.
	Email address: Click or tap here to enter text.
	(please add further fields as required)
13. Is your company engaged in any other business activities	Yes □ No □
other than student	If so, please provide brief details: Click or tap here to enter text.
recruitment?	
14. How many staff do you employ for student recruitment and counselling?	Number of staff: Click or tap here to enter text.



15. Please list all branches/offices	Click or tap here to enter text.
that you operate from	
10 Diagon manido detaile efem.	Name of acception theriping. Clink on too hours to out out
16. Please provide details of any	Name of accreditation/training: Click or tap here to enter text.
agent accredited training	Copy of certificate provided:
undertaken by your company	Copy of certificate provided.
(e.g. British Council Training or	Yes □ No □
UKVI)	Yes □ No □

Business Operations:

17. Do you currently represent other UK higher education	Yes □ No					
institutions?	If yes, please complete the following details:					
	h.				How many years have you worked together?	
	1.Click or tap he	ere to ente	er text.			
	2.Click or tap he	ere to ente	er text.			
	3.Click or tap he	3.Click or tap here to enter text.				
	4.Click or tap here to enter text.					
18. Please outline how many	For	UK	world-	For	UK	world-
students you recruit annually to	undergraduat		wide	postgraduate		wide
the UK and/or world-wide	e study	Enter	Enter	study	Enter	Enter
		number	number		number	number
		here.	here.		here.	here.
	For English	UK	world-	For other study	UK	world-
	Language		wide			wide
	courses	Enter	Enter	_	Enter	Enter
		number	number		number	number
		here.	here.		here.	here.
19. Please list the	Click or tap here	to enter	text.			
country/countries from which						
you would be interested in						



recruiting students to Arden University from					
20. Please state which Arden University study programmes you would recruit for (if 'all', then state this)	Click or tap here to enter text.				
21. Please indicate your estimated recruitment numbers for Arden University annually	Click or tap here to enter text.				
22. Do you charge prospective students?	For an advisory service: Yes \square No \square				
statents:	If so, please state amount: Click or tap here to enter text.				
	For application support: Yes □ No □				
	If so, please state amount: Click or tap here to enter text.				
23.Please indicate what other service	s are offered by your company. Please select from the following:				
☐Interviewing facilities on premises					
☐Pre-departure briefing meetings fo	parture briefing meetings for students				
☐Assistance with students' visa requ	irements (if applicable)				
☐Assistance with students' travel arr	' travel arrangements				
Other, please give details Click or tap	here to enter text.				
23. Do you know of any other connection you may already	Yes 🗆 No 🗆				
	If so, please provide details: Click or tap here to enter text.				
24. Do you use sub-agents to support recruitment activity?	Yes □ No □				



Standards – UK Regulation

25. Do you have awareness and knowledge of UK Bribery Act 2010
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References

Please supply the name and contact details of two referees from institutions for whom you act as an Agent in student recruitment (preferably UK HEIs)

	Referee 1	Referee 2
Company name	Click or tap here to enter text.	Click or tap here to enter text.
Contact name	Click or tap here to enter text.	Click or tap here to enter text.
Job title	Click or tap here to enter text.	Click or tap here to enter text.
Address	Click or tap here to enter text.	Click or tap here to enter text.
Telephone Number	Click or tap here to enter text.	Click or tap here to enter text.
Contact Email Address	Click or tap here to enter text.	Click or tap here to enter text.

Thank you for completing this form, please ensure you include the following documentation:

Company certification of incorporation	Yes □	No □	
Agent accredited training certificate (if	Yes □	No □	
available)			



Appendix 4

Agent Approval Criteria Checklist

Name of Agent:

Aspect:	Assessment Method	Requirement	Sufficient Evidence	Comments
Organisation overview and profile	 Adequate completion of the agent proposal form and application form 	Mandatory	Choose an item.	
- to provide indication of an	 Google maps to check adequate location and office frontage (for UK agents only) 	Preferred	Choose an item.	
organisation's business image, competencies and approach	 Agent website adequate in terms of overall presentation (inc. level of English), accuracy of content and secure (for UK Agents only) 	Mandatory	Choose an item.	
Legal and professional	Confirmation of company registration	Mandatory	Choose an item.	
standing	 Confirmation of Public Liability Insurance to demonstrate agent's 	Mandatory (for Agents)	UK Choose an item.	



- to illustrate an organisation's adherence to	duty of care and level of responsibility (for UK agents only)			
minimum legal and professional standards	 Confirmation of Privacy Policy to demonstrate agent has adequate coverage of requesting, transferring and securing applicant data (for UK agents only) 	Mandatory	Choose an item.	
Ethics, Standards and Integrity	 Has the agent completed any sector recognised agent training (e.g. British Council)? 	Preferred	Choose an item.	
 to provide an insight into an organisation's business conduct 	 Confirmation of two satisfactory business references (ideally from other HEIs) 	Mandatory	Choose an item.	
553655 554460	 Confirmation of Tier-4 and visa regulation knowledge (if applicable) 	Mandatory (for international Agents)	Choose an item.	
Premises (only applicable for UK	 Premise available for duration of agreement 	Mandatory	Choose an item.	



Agents, where there will be	Fire Safety	Mandatory	Choose an item.	
onsite Arden University branding and applicants will enter Agent premises)	 Disabled access if not met then a full statement of how the obligation would be fulfilled by the organisation 	Preferred	Choose an item.	Please provide details of any alternative provision:
	First Aid	Preferred	Choose an item.	
- to illustrate an organisation's duty of care, level of responsibility for health and safety and adherence of obligations and standards as expected by the University Due Diligence Sumr	 Safeguarding Health and Safety Policy 	Preferred	Choose an item.	



Decision by Senior Quality Manager:
□ Approved
□ Not approved
□Refer to Registrar
Decision by Registrar:

