



Agent Policy

1. Policy Overview

Recruitment agents (Agents) play a vital role in the recruitment of students to the College. This policy outlines the principles and process used to identify, select, approve, manage, and review Agents.

2. Policy Statement

This policy upholds the seven principles for ethical international student recruitment, known as the 'London Statement'¹ which sets out the Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants, namely that

- Agents practice responsible business ethics.
- Agents provide current, accurate and honest information ethically.
- Agents develop transparent business relationships with students and providers using written agreements.
- Agents protect the interests of minors.
- Agents provide current and up-to-date information that enables international students to make informed choices when seeking which agent to employ.
- Agents act professionally.
- Agents work with destination countries and providers to raise ethical standards and best practice.

3. Roles and Responsibilities

Responsibility for implementation and oversight of this policy lies with the Chief Revenue Officer. The policy will be monitored and reviewed regularly to reflect good practice and any changes to relevant legislation. Agent communications will be monitored by the Recruitment

¹ <https://www.britishcouncil.org/contact/press/landmark-international-code-ethics>



and Admissions Officer to ensure agent websites and programme material is current, up to date and accurate in their representation of the College and programme.

The Academic Director is responsible for ensuring that policies are developed and maintained, that they remain fit for purpose, that they remain in compliance with QQI guidelines, that they are updated as per agreed schedules, and that they are being implemented as intended. In the latter context, the Academic Director will inspect a sample of policies each year to check for the correct implementation and bring the findings to AC as part of the annual QA/QQI review and reporting process.

4. Policy

Careful management is required to ensure that all partner Agents are a good fit for the type of recruitment and student appropriate to an Irish international foundation pathway education college.

Code of Conduct

All Agents are expected to comply with UDOC006 UniHaven Supplier Code Rev 1. This Code is communicated to Agents via its inclusion in UDOC009 Agent Agreement Rev 1.

The College places business ethics and corporate social responsibility at the forefront of all activities, including those with suppliers, both direct and indirect, recognising that they are key stakeholders in the success of the College. Not surprisingly, College requirements are very high; suppliers are expected to work in line with the College's legal, ethical, and regulatory expectations and to be quality driven. This Code sets out these requirements. The College strives to be a fair and honest partner, firmly believing that relationships built on trust and integrity will be sustainable and beneficial for all. The College may terminate an agreement



with an Agent who violates this Code or refuses, if asked, to take part in a remediation plan where issues have been identified. The College will also cease to deal with Agents who do not demonstrate that they meet its ethical and corporate social responsibility standards or compliance with relevant laws. Likewise, the College looks to reward and recognise excellent performance and innovation with its Agents.

Agent performance will be managed using one or more of the following methods:

- Direct communication and agent approval by the Chief Revenue Officer.
- Specific contract clauses.
- Completion of a Supplier Code of Conduct questionnaire.
- Physical audit of promotional material, processes, and procedures.
- Third party to Code of Conduct questionnaire assessment where required.

Site visits, if required, will be specifically agreed upon in advance between both parties to provide transparency.

The three areas where the support and commitment of Agents are required, with a minimum expectation being the compliance with all applicable local and international legislation, are as follows:

- Communications and Information
 - To only publicise programme information that has been pre-approved by the College in advance.
 - To maintain the accuracy of this information such that students only always receive current College and programme information.
- People and Community
 - To support and respect the protection of human rights within their areas of influence.
 - To prohibit all forms of modern slavery, including Forced Labour - Bonded Labour - Compulsory Labour - Child Labour.



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- To support the College ethos of student care, quality, professionalism and integrity when recruiting students on the College behalf.
 - Governance and Compliance
 - To comply with all relevant Irish legislation and legalisation in countries where agents operate as outlined in and implied from our written agreements.
 - To comply with College QQI requirements as relevant to the nature of the activity, product or service being supplied.

The College seeks assurance that Agents are working to expected levels in several different ways depending upon:

- The legislative requirements associated with the service being provided.
- The source country of the services and any significant risk that working in such countries may pose.
- The level of spend.

Selection of Agents

- Agents will complete an application form. All applicants for the role shall be expected to have a proven track record of working with professional institutions and to understand the vision and mission of the College.
- The College will evaluate Agents ensuring due diligence is completed including the vetting of Agents using UFORM025 Agent Referee Check Form Rev 1.
- Agents will be given a copy of UDOC003 Agent Handbook Rev 1 that they need to commit to complying with when entering a relationship with the College.
- The terms of business, targets and contracts will be outlined by way of formal agreement via UDOC009 UniHaven Agent Agreement Rev 1 and signed off by both the Agent and the Chief Revenue Officer.
- Agents will be provided with the necessary information and resources needed to facilitate student recruitment, including training sessions as needed. The Recruitment



and Admissions Officer will check Agent websites and promotional material to ensure that information publicised about the College and programme is accurate.

Ongoing Management

- The College will provide ongoing training for all partner Agents as needs are identified.
- A continuous line of communications will operate between the College and all Agents via both the Chief Revenue Officer and the Recruitment and Admissions Officer.
- Agent behaviour and performance will be monitored by the Chief Revenue Officer supported by the Recruitment and Admissions Officer, especially by
 - Analysing the quality of student applications in terms of their quality, accuracy, timeliness, and completion
 - Considering feedback from applicants in cases where they have a different understanding of the programme and its requirements to those communicated to Agents publicly and directly via College correspondence thereby highlighting potential misleading Agent communication.
- The Academic Director as part of his/her auditing role at the College will spot-check Agent publications and communications for accuracy with College Agent agreements and requirements.

Any immediate concerns or issues identified will be dealt with as a matter of urgency by the Chief Revenue Officer with action taken ranging from correction up to and including contract termination as allowed for under the terms of UDOC009 UniHaven Agent Agreement Rev 1.

Review of Agent/Exit Option

- Agent performance will be reviewed annually evaluated against that which was agreed upon in their Agent Agreement.



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- This review will determine whether to renew the contract with or without conditions or whether to consider termination of the agreement.

5. Procedures and Forms

The following policies and forms are used in the implementation of this policy.

- UDOC003 UniHaven Agent Handbook Rev 1.
- UDOC006 UniHaven Supplier Code of Conduct Rev 1.
- UDOC009 UniHaven Agent Agreement Rev 1.
- UPOL029 UniHaven Collaborations and External Appointments Policy Rev 1.
- UFORM016 UniHaven Agent Application Form Rev 1...see Appendix.
- UFORM025 UniHaven Agent Referee Check Form Rev 1...see Appendix.



Appendix

- UFORM016 UniHaven Agent Application Form Rev 1**

Thank you for your application to act as an education partner agent for UniHaven Ltd. To consider your application, we would be grateful if you could complete the following details and return this form to us.

This form is to be used to gather information about companies who are interested in representing UniHaven Ltd as educational advisors to potential students seeking entry into courses we offer.

Completed forms will be filed by our agent enquiries team. If an opportunity for representation in your area arises, the details on this form will be given consideration and if you are successful in your application, the agent enquiries will contact you to discuss continuing with the vetting procedure.

NB: You will only be contacted if we wish to pursue your application.

Please complete this form with as much information as possible to support your application.

Company Details

1. Family Name	
2. Given Names	
3. Main contact name for the agent enquiries team (if different from above)	
4. Company Name	
5. Company Address	
6. Company Registration Number	
7. Telephone Number(s)	
8. Mobile Number(s)	
9. Fax Number(s)	
10. Email Address(es)	



11. Website Address	
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Details of current company activities

1. Which geographical areas do you wish to represent UniHaven in?		
2. How many years you have worked as an agent?		
3. Have you got government authorisation (if required)?	Yes <input type="checkbox"/> Number:	No <input type="checkbox"/>
4. Have you completed any agents training programme? If yes, please specify.	Yes <input type="checkbox"/> Date: Name:	No <input type="checkbox"/>
5. Are you a member of any national agents' organisations e.g., TIECA, CIECA, TOSA?	Yes <input type="checkbox"/> Name(s) of organisation(s)	No <input type="checkbox"/>
6. How many institutions do you currently recruit for?		
7. How many of these institutions are in Ireland or the UK?		
8. What is the administration or processing fee amount that you charge students?		
9. What is the usual rate of commission you expect?		



Details of students that you recruit

1. How many students have you sent abroad in the past few years?		
2. What % of these have been to Ireland or the UK?		
3. What is the normal level of study that you recruit students for?	Undergraduate <input type="checkbox"/> Postgraduate <input type="checkbox"/> Foundation <input type="checkbox"/> English courses <input type="checkbox"/> Other <input type="checkbox"/>	
4. Which programmes are your students most interested in? (please list the main subject areas)	1 2 3 4 5 6 7 8 9 10	



References

If the enquiries team decides to pursue your application, your referees will be contacted and asked to give a reference. Only when **both** references have been returned, will we continue to process your application.

1. Reference 1 – name and full address		
	Name	
	Title / position	
	Organisation/Institution	
	Address	
	Email	
	Telephone number	
	Fax number	
2. How many years have you worked with this person?		
3. Reference 2 – name and full address		
	Name	
	Title / position	
	Organisation/Institution	
	Address	
	Email	
	Telephone number	
	Fax number	
4. How many years have you worked with this person?		
5. I authorise you to contact the above referees	Yes <input type="checkbox"/>	No <input type="checkbox"/>
6. Signature		Date



Further Information

To support your application, please give any additional information that you may think will be relevant to your work for UniHaven Ltd on an attached sheet.

You may wish to include details of the structure of your company, details of how you assist your current students with their applications and the visa process, why you have chosen to represent the UniHaven, your business plans for the future etc. If you have your own company brochure, please also return this with your application.

Returning your application form

You can return this form initially by email to agentenquiries@unihaven.ie

For office use only

Date received		
Reference 1 requested		
Reference 2 requested		
Date Reference 1 received		
Date Reference 2 received		
Decision made		Date
Territory		
Contract Start Date		
Contract End Date		

Signed: Chief Revenue Officer

Print Name:

Date:



UniHaven Agent Referee Check Form Rev 1

Referee	
Company	
Officer's Name	
Phone	
Fax	
Email	
How long have you worked with this agent?	
Approx. how many students has the Agent successfully recruited for your institution in:	This year:
	Last Year:
	Previous Year:
Have you had any problems when dealing with this agent before? If so, please comment in detail.	



Agent rating 5-1 (Internal) (with 5 being high and 1 being low) Comment	Rating	Comment
Provision of market intelligence		
Useful contacts within market (i.e., Government / Industry)		
In-country logistical support		
Level of professionalism		
Successful conversion on offers		
Appropriate student counselling		
Knowledge of your institution		
Sufficient focus on your institution		
Completeness of Applications (i.e. complete documentation, accuracy of details)		
Overall, would you recommend working with this agent?	Yes	No

Any additional comments:

Thank you for your kind assistance!

Quality Assurance Manual (QAM) Chapter 12

Document Name	Agent Policy
Policy Document Number	UPOL027
Version Reference	Rev.1
Document Owner	Academic Director
Roles with Aligned Responsibility	Chief Revenue Officer, Recruitment and Admissions Officer
Approved By	Academic Council
Approval Date	2.3.2023
Date Policy Becomes Active	1.4.2023
Revision Cycle	Annually
Revision History/Amalgamation History	Revised for text errors post programme validation
Rev 1 Additional Information	N/A
References/ Supporting Documentation	<p>UDOC000 UniHaven Quality Assurance Manual Rev 2 Statutory Quality Assurance Guidelines developed by QCI for use by all Providers (2016) Statutory Quality Assurance Guidelines developed by QCI for Independent/Private Providers coming to QCI on a Voluntary Basis (2016) British Council... https://www.britishcouncil.org/contact/press/landmark-international-code-ethics UDOC003 UniHaven Agent Handbook Rev 1 UDOC006 UniHaven Supplier Code of Conduct Rev 1 UPOL029 UniHaven Collaborations and External Appointments Policy Rev 1</p>