Cardiff Academy

POLICY /// GOVERNANCE AND CORPORATE

Education Agent Recruitment and Management Policy

How Cardiff Academy selects, contracts, trains, pays, monitors and, where necessary, terminates the education agents who refer international students, so that recruitment is ethical, accurate and compliant with Home Office and university partner expectations.

REFERENCE	**CA-GOV-12**	VERSION	**1.0 (Approved)**
POLICY OWNER	**Chief Executive Officer**	APPROVED BY	**Board of Governors**
ISSUE DATE	**October 2026**	APPROVAL DATE	**October 2026**
REVIEW CYCLE	**Annual**	NEXT REVIEW DUE	**October 2027**
APPLIES TO	**Admissions, marketing, finance and senior staff; all contracted agents and sub-agents**	PUBLISHED	**Staff portal; agent portal; summary on website**

RELATED POLICIES CA-GOV-05 Anti-Bribery, Corruption and Fraud; CA-GOV-11 Marketing and Provision of Information; CA-ADM-01 Admissions; CA-ADM-02 Fees, Refunds and Cancellations; CA-ADM-03 UKVI Sponsor Compliance; CA-GOV-06 Modern Slavery Statement

LEGAL ENTITY Cardiff Education Group Ltd, trading as Cardiff Academy (Company No. 14569122). Registered office: 168 City Road, Cardiff CF24 3JE. Teaching premises: 8 Drake Walk, Cardiff CF10 4LG

1 Purpose

Agents are an important route for international students to find Cardiff Academy. The Academy remains responsible for what its agents say and do. This policy makes sure that we work only with reputable agents who give accurate advice, act in students' best interests and support our compliance with the Student sponsor guidance.

2 Principles

We follow the **UK Agent Quality Framework (AQF)** and the **National Code of Ethical Practice for UK Education Agents**. Agents must:

- act honestly and in the best interests of the student
- give accurate, up-to-date information about the Academy, its programmes, fees, entry requirements and progression routes
- never guarantee admission, a visa or a university place
- never submit, or encourage the submission of, false or misleading documents
- disclose to students any fees they charge and the fact that they receive commission from the Academy
- protect students' personal data
- maintain recognised professional training (for example British Council Agent and Counsellor Training or equivalent)

3 Appointing an agent

1. **Application:** the agent completes the Agent Application Form (company details, ownership, locations, sub-agents, referees, institutions represented, counsellor training).
2. **Due diligence:** the Admissions and Compliance Manager checks company registration, identity of owners and directors, references from at least two UK institutions, online reputation, sanctions screening where relevant, and visa refusal history where available.
3. **Approval:** the CEO approves new agents. The decision and evidence are recorded in the **Agent Register**.
4. **Contract:** the agent signs the Academy's standard Agent Agreement, which includes: scope and territories; commission terms; anti-bribery, fraud, modern slavery and data protection clauses; prohibition on sub-agents without written approval; marketing approval rules; performance standards; audit rights; and termination rights. No referrals are accepted before the contract is signed.
5. **Onboarding:** the agent completes Academy training on programmes, entry requirements, under-18 requirements, the refund policy, the Student Protection Plan, and our UKVI responsibilities, and receives approved marketing materials.

4 Sub-agents

Sub-agents may only be used with the Academy's prior written approval. The principal agent is responsible for the sub-agent's conduct and must provide the sub-agent's details for the Agent Register.

5 Applications through agents

- Applications must be submitted through the Academy's application system with the student's own contact details (not only the agent's), so that we can contact the student directly.
- Admissions staff speak directly to every applicant (interview or credibility check) before an offer is made for a sponsored programme.
- The agent's name is recorded on the student record and, where required, on the CAS.
- Fees are paid directly to the Academy wherever possible. Where an agent collects fees, the agreement sets out how and when funds are transferred, and the student receives a receipt from the Academy.

6 Commission

- Commission is paid only under a signed agreement, at the agreed rate, for students who have **enrolled and paid** the relevant fees, and after the refund period has passed.
- Commission is paid only to a verified business bank account in the agent's legal name.
- If a student withdraws and receives a refund, commission is recovered in proportion.
- No commission is paid for students whose application involved false documents.
- The CFO approves all commission payments, and the Compliance Group reviews them monthly.

7 Monitoring performance

The Admissions and Compliance Manager maintains an **Agent Performance Dashboard** reviewed by the Compliance Group each term, covering:

Measure	Concern trigger
Applications, offers and enrolments	Low conversion to enrolment
Visa refusals for the agent's students	Any refusal for deception; refusal rate approaching the Academy's internal limit of 3%
No-shows and early withdrawals	Above 5%
Attendance and completion of the agent's students	Patterns of poor attendance
Complaints from students about the agent	Any substantiated complaint
Accuracy of agent publicity	Any misleading material
Document fraud	Any case

Each agent receives an **annual review** with a rating (Green / Amber / Red) and an action plan where needed.

8 Concerns, suspension and termination

The Academy will suspend referrals from an agent immediately, pending investigation, where there is evidence of fraud, bribery, false documents, misleading information, a pattern of visa refusals, or a safeguarding concern. Following investigation, the CEO may issue a warning, impose conditions, or terminate the agreement. Serious matters will be reported to UKVI, to partner universities and, where appropriate, to the police or the British Council.

9 Data protection

Agents act as independent controllers or processors as set out in the Agent Agreement and the data sharing schedule. Agents must keep applicant data secure, use it only for the application, and delete it when no longer needed.

10 Records

The Agent Register, due diligence records, contracts, training records, performance reviews and commission records are kept for at least six years after the relationship ends and are available to UKVI, inspectors and partner universities.

11 Review

This policy is reviewed annually by the CEO. The current agent list is reviewed by the Board annually.

Compliance mapping

This policy has been written to meet, and to evidence, the following external requirements. Inspectors and university partners can use this table to locate the relevant provisions.

ISI Educational Oversight (PFE) standards	Standard 48 (appropriate policies); Standard 57–61 (accurate information)
British Council Accreditation UK criteria	M21–M26 (accuracy of all publicity, including that produced by agents); M15 (pre-arrival information)
UKVI Student sponsor guidance	Student sponsor guidance – sponsors are responsible for the actions of agents acting on their behalf; agent details recorded on CAS where required; refusal rate and BCA metrics
University partner due diligence	Partner due diligence – agent management framework; UK Agent Quality Framework (AQF); National Code of Ethical Practice for UK Education Agents; partner rules on sub-agents and commission
Legislation and statutory guidance	Bribery Act 2010; Modern Slavery Act 2015; Digital Markets, Competition and Consumers Act 2024; UK GDPR (data sharing with agents)

Document control

Version	Date	Author / reviewer	Summary of changes
0.9	Pre-2026	Various	Agent-Recruitment-Management-Procedure; CA Agent Contract templates (fixed and percentage commission)
1.0	October 2026	Chief Executive Officer	New policy written for university partnerships, ISI Educational Oversight and British Council Accreditation UK. Supersedes all previous versions.

APPROVED ON BEHALF OF THE BOARD	SIGNATURE	DATE
Chair of the Board of Governors		