Fairfield School of Business

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Agent Management Policy
UK Student Recruitment

Version 1.0

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1. Introduction

1.1. This policy establishes the principles and controls for the appointment, management, monitoring and termination of agents recruiting UK students on behalf of Fairfield School of Business (FSB).

1.2. Fairfield School of Business (FSB) is committed to fair, transparent, ethical and student-centred recruitment. This policy sets out how FSB appoints and manages recruitment agents and protects applicants, its university partners and the reputation of FSB.

1.3. The policy has been informed by the British Council UK Agent Quality Framework (AQF)[1], relevant consumer protection and data protection requirements, Office for Students expectations, and the requirements of FSB's university partners.

1.4. FSB remains accountable for recruitment activity undertaken in its name. The use of an agent does not transfer FSB's responsibilities for the accuracy of information, the integrity of admissions or the treatment of applicants.

Applicability

1.5. This policy applies to individuals and organisations engaged by FSB to introduce, advise or support prospective UK students. It also applies to FSB employees responsible for appointing, training, managing or monitoring those agents. International student recruitment and Student visa sponsorship activity are outside its scope.

2. Purpose and strategic use of recruitment agents

2.1. FSB uses recruitment agents as one element of its wider UK student recruitment strategy. Agents can provide prospective students with accessible information, guidance and support, particularly where applicants may benefit from additional assistance in understanding

[1] About the UK Agent Quality Framework (AQF) | British Council

higher education opportunities, entry requirements, application processes and the programmes available at FSB.

2.2. Agents can also help FSB engage with communities and prospective applicants that may be less familiar with higher education or less likely to access information through traditional recruitment channels. Their role therefore supports FSB's commitment to widening participation, widening access and promoting inclusive opportunities in higher education.

2.3. The use of agents does not replace FSB's direct recruitment, outreach, admissions, or student support activities. Agents operate as an additional recruitment channel and must support, rather than undermine, FSB's commitment to fair access, informed choice, ethical recruitment and applicant independence.

2.4. FSB will seek to ensure that its agent network contributes positively to its wider recruitment objectives while maintaining appropriate controls over quality, compliance, applicant protection and institutional reputation.

3. Principles

3.1. FSB will manage agents according to the following principles:

- the interests and informed choices of prospective students come first
- information and advice must be accurate, current, accessible and not misleading
- admissions decisions remain independent and are made only by FSB and, where applicable, its university partner
- recruitment must be inclusive, lawful and consistent with FSB’s widening-access mission; and
- risks, conflicts of interest, complaints and suspected misconduct must be identified and acted upon promptly.

4. Appointment and Approval of Agents

4.1. Prospective agents must complete FSB's Agent Compliance Verification Process before undertaking any recruitment activity. The six-stage process is set out in Appendix A.

4.2. Due diligence will be proportionate to risk and will include, as applicable:

- identity, ownership, Companies House registration and any relevant licenses
- operating locations, staffing, website, marketing activity and any branch network
- references from institutions represented and evidence of an appropriate recruitment record
- regulatory knowledge, safeguarding awareness and understanding of UK higher education
- conflicts of interest, reputational, financial, operational and fraud risks; and
- a site visit or other verification where required.

4.3. No agent may represent FSB until the due diligence record and risk assessment are complete and written approval has been granted by the Agent Relations Manager. High-risk, exceptional or conflicted appointments must be referred to the Executive Committee or its nominee.

4.4. FSB may refuse an appointment where it cannot obtain satisfactory assurance about an agent's ownership, conduct, competence, financial standing, references or ability to comply with this policy.

5. Contracting and Onboarding

5.1. Every approved agent must enter into a written, time-limited contract before receiving access to FSB systems, materials or applicant

information. The contract will define authorised services, territory where relevant, commission arrangements, confidentiality, data protection, monitoring, audit, renewal and termination rights.

5.2. An agent must not appoint or use a sub-agent, introducer or other third party for FSB recruitment without FSB's prior written approval. Approved sub-agents are subject to equivalent due diligence, training, contractual controls and monitoring, and the principal agent remains responsible for their conduct.

5.3. Onboarding will include contract confirmation, induction, training, approved marketing information, named FSB contacts, escalation routes and controlled access to the application portal. Access must be limited to what is necessary for the agent's authorised role.

6. Agent Conduct and Prohibited Practices

6.1. Agents must act honestly, professionally and in the best interests of prospective students. They must use only current FSB-approved information and clearly explain the identity of FSB, the relevant university partner, the nature of the partnership, programme requirements, location, delivery arrangements, fees and other material information.

6.2. Agents must recruit only applicants who have a genuine interest in study and a reasonable prospect of meeting the published entry requirements. They must not discriminate unlawfully or use harassment, coercion, exploitation, undue influence or high-pressure sales tactics.

6.3. **Agents must not:**

- provide false, incomplete or misleading information or make promises about admission, student finance, employment or outcomes beyond FSB's control;

- use, generate, submit or facilitate the use of artificial intelligence (AI), generative AI or other automated tools to create, substantially draft, rewrite or materially alter an applicant's personal statement, application response, assessment submission or any other

documentation that is required to represent the applicant's own work, experience, motivation, views, qualifications or abilities;

- complete, coach or impersonate an applicant in any test, personal statement, interview or other element that must demonstrate the applicant's own ability or motivation;

- submit, alter or knowingly facilitate false or fraudulent documents or information;

- apply for student funding or access an applicant's finance account on their behalf;

- charge applicants any fee connected with an FSB application unless expressly authorised in writing and transparently disclosed;

- make an admissions decision, guarantee an offer or imply that payment or use of an agent improves the likelihood of admission;

- use unapproved branding, marketing materials, testimonials or comparisons;

- offer or accept bribes, improper inducements, undisclosed referral payments or other benefits creating a conflict of interest;

- approach, contact, solicit or seek to divert applicants who have applied directly to FSB, including attempting to persuade or encourage direct applicants to appoint the agent or otherwise interfere with FSB's direct recruitment processes;

- contact FSB's Admissions team or other staff directly on behalf of an applicant without prior authorisation, or misrepresent themselves as an applicant, including using an applicant's identity, email address, account or other personal information to communicate with FSB;

- attend, arrange or facilitate a visit to any FSB campus, office, event or student-facing activity without prior approval from FSB. Agents must not present themselves as authorised representatives of FSB or seek access to staff, students or applicants without appropriate authorisation.

6.4. Agents must immediately report suspected fraud, safeguarding concerns, data breaches, conflicts of interest, regulatory breaches or conduct that may harm an applicant, FSB or a university partner.

7. Whistleblowing and Raising Concerns

7.1. FSB is committed to maintaining high standards of integrity, transparency, accountability and professional conduct across all aspects of its admissions and recruitment activities.

7.2. Any concerns regarding malpractice, inappropriate conduct, conflicts of interest, fraud, misrepresentation, breaches of admissions requirements, regulatory requirements, this policy or any other serious concern relating to the activities of recruitment agents should be raised promptly through FSB's established whistleblowing process.

7.3. Concerns will be managed in accordance with FSB's Whistleblowing Policy and associated procedures. Individuals who raise concerns in good faith will be treated fairly and will be protected in accordance with the relevant FSB policy and applicable legislation.

7.4. Recruitment agents are expected to cooperate fully with any investigation and to provide accurate information and documentation when requested. Where a concern relates to the conduct or performance of an agent, FSB may undertake appropriate investigation, monitoring or audit activity and, where necessary, implement corrective action or review the agent's ongoing appointment.

8. Training and Support

8.1. Relevant agent personnel must complete FSB’s induction before recruiting and must undertake refresher training at least annually, or sooner where programmes, regulations, partner requirements or FSB procedures change.

8.2. Training will cover this policy as well as other themes, including ethical recruitment, programme and entry information, the admissions process, applicant-led assessments, consumer protection, data protection, safeguarding, fraud prevention, student finance boundaries, approved marketing and escalation routes.

8.3. FSB will retain training and attendance records. Failure to complete the training required may result in portal access being withheld or suspended and applications not being accepted from the agent.

9. Monitoring and Review

9.1. FSB will record the agent associated with each applicant and monitor agent performance and compliance throughout the relationship. Monitoring will be risk-based and will include, where relevant:

- application, offer, enrolment and conversion patterns;
- withdrawal, retention, engagement and academic outcomes of recruited students;
- document authenticity, admissions exceptions, duplicate or coordinated applications and other risk indicators;
- samples of applications, communications, interviews and marketing materials;
- student feedback, complaints and concerns raised by staff, partners or regulators; and
- compliance with contractual targets, training, reporting and data protection requirements;
- internal audits and compliance checks;
- review of agent conduct and adherence to FSB requirements;
- reporting to relevant FSB committees and governance structures;

- implementation and monitoring of corrective or improvement actions where required.

9.2. The purpose of agent monitoring is to ensure that FSB maintains appropriate oversight of third-party recruitment activity and that agents continue to support FSB's strategic objectives, admissions standards, applicant experience and commitment to widening participation.

9.3. Agents will receive a formal review at least annually. The review will determine whether the relationship should continue, require improvement measures, be restricted, suspended or terminated.

9.4. FSB and its university partners may audit an agent's relevant records, systems, premises, marketing and applicant communications. Agents must cooperate and provide information promptly, subject to applicable data protection law.

9.5. Commission will be paid only in accordance with the contract, following verification of eligibility. FSB may withhold or recover payment where an application is fraudulent, ineligible, duplicated, incorrectly attributed or connected with a contractual or policy breach.

9.6. Agents do not have authority to make admissions decisions on behalf of FSB. All final admissions decisions remain subject to FSB and FSB's university partner's approved admissions processes and academic requirements.

10. Complaints, Concerns and Investigations

10.1. Applicants and students must have an accessible route to raise concerns about an agent directly with FSB and must not suffer disadvantage for doing so. Complaints will be handled under the applicable FSB complaints procedure and shared with a university partner where required.

10.2. Allegations of agent misconduct will be recorded and investigated fairly and promptly by the Agent Relations Manager or an appropriate nominee. The agent will normally be given an opportunity to respond

unless immediate protective action or confidentiality requirements make this inappropriate.

10.3. FSB may pause applications, suspend system access or stop recruitment while an investigation is underway. Safeguarding, fraud, criminal, data protection or regulatory concerns will be escalated to the appropriate internal lead, university partner or external authority.

10.4. FSB maintains an *Agent Concern Reporting Form* to support the consistent recording and management of concerns relating to agents. The form will be provided to the individual raising the concern at the first point at which the concern is reported, where appropriate, and should be completed with as much relevant information and supporting evidence as reasonably available. The information provided will support FSB in assessing the concern, determining the appropriate course of action and ensuring that matters are recorded and managed in accordance with FSB's Whistleblowing Policy and associated procedures.

10.5. FSB maintains an *Agent Safeguarding Form* for agents to report any safeguarding concerns they may have regarding an applicant they have referred to FSB. Agents are expected to report any safeguarding concern promptly and accurately to ensure that appropriate support, risk assessment and action can be taken in accordance with FSB's safeguarding policies and procedures.

10.6. All information provided through the *Agent Safeguarding Form* will be treated sensitively and confidentially and will only be shared with authorised personnel who have a legitimate role in assessing and managing the safeguarding concern. Agents are expected to cooperate fully with any subsequent safeguarding enquiries or investigations and to provide any relevant information or documentation requested by FSB.

11. Suspension, Termination and Renewal

11.1. FSB may impose additional training, an improvement plan, enhanced monitoring, recruitment restrictions or suspension where performance or compliance falls below the required standard.

11.2. FSB may terminate an agent's appointment immediately for serious misconduct or loss of trust, including fraud, bribery, applicant impersonation, misuse of personal data, unauthorised sub-agents, serious misleading information, safeguarding failures, obstruction of an audit or conduct likely to bring FSB or a university partner into disrepute.

11.3. Contract renewal is not automatic. Renewal will depend on satisfactory due diligence, performance, compliance, training, student outcomes, complaints history, business need and any university-partner requirements.

11.4. On suspension, expiry or termination, the agent must stop representing FSB, cease using its branding, return or securely delete information as instructed and lose access to FSB systems. FSB will manage affected applicants fairly and provide appropriate communications.

12. Records, Reporting and Data Protection

12.1. FSB will maintain an accurate register of approved agents and retain appropriate records of applications, due diligence, risk assessments, contracts, approvals, training, monitoring, complaints, investigations, commission and decisions in accordance with its retention requirements.

12.2. Agents may collect, access and share personal data only where authorised, necessary and lawful. They must use secure methods, follow FSB instructions, respect applicant privacy rights and report any actual or suspected data breach immediately.

12.3. Material agent concerns and performance information will be reported through FSB's governance arrangements and to relevant university partners in the form and frequency required. FSB will notify a university partner promptly of serious issues connected with its provision or reputation.

12.4. FSB will publish or otherwise make available appropriate information about its authorised agents where required for transparency, applicant protection or partner compliance.

Appendix A - Agent Compliance Verification Process

The following process must be completed before an agent is authorised to recruit on behalf of FSB and throughout the duration of the relationship.

Stage 1 - Initial Contact

The prospective agent expresses an interest in working with FSB.

The Agent Relations Manager provides the Agent Application Form and this policy.

The prospective agent is informed that no recruitment activity may begin until written approval and a contract are in place.

Stage 2 - Interview

Following receipt of a completed application, the Agent Relations Manager interviews the prospective agent.

The interview considers regulatory knowledge and recruitment practices; company profile and track record; knowledge of UK higher education; safeguarding; marketing practices; and understanding of FSB.

Stage 3 - Reference Checks

FSB contacts the referees named in the application.

Referees are asked to verify the information provided and confirm their experience of the agent. References are recorded as part of the due-diligence file.

Stage 4 - Due Diligence, Screening and Approval

FSB reviews the completed application, interview record and references.

Checks include Companies House registration and directors; the agent's website and marketing; a site visit where required; conflicts of interest; and a documented risk assessment.

The Agent Relations Manager records the decision. No agent may proceed without written approval; high-risk, exceptional or conflicted cases are referred in accordance with Section 4 of the Agent Management Policy.

Stage 5 - Contracting and Onboarding

An approved agent signs FSB's agent contract before undertaking recruitment activity.

FSB provides induction and required training, confirms approved information and materials, and grants controlled access to the application portal where appropriate.

The agent is given named contacts and escalation routes.

Stage 6 - Monitoring and Review

FSB records and tracks applicants and enrolled students referred by the agent.

The agent's performance and compliance are monitored throughout the relationship and formally reviewed at least annually in accordance with Section 9 of the Agent Management Policy.

Concerns, required improvements, restrictions, suspension, renewal or termination are recorded and addressed under this policy.

Version information

Version	Changes	Approved by	Date
0.1	First draft version.	n/a	n/a
0.2	Formatted draft presented for approval.	n/a	n/a
1.0	Approved by Chair's Action.	Board of Governors	November 2026



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