Diversification and strengthening international recruitment practices
Contents

Foreword by Jamie Arrowsmith, Director, Universities UK International 2
Executive summary 4
Introduction 7
International recruitment trends 8
Diversifying international recruitment 10
Deposits 13
Using pre-CAS interviews 17
Dependants 20
Working with agents 23
Further resources 29
International students deliver huge cultural, social, and economic benefits to the UK. A single cohort delivers a net economic contribution of over £37 billion to the UK economy, with every 11 non-EU students generating £1 million worth of net economic impact for the UK economy.

We should be proud that our universities continue to attract students from all over the world, and that higher education is one of the UK’s most important and successful exports.

Recent years have seen a marked increase in the number of international students choosing to study in the UK. This has come off the back of the success of the government’s International Education Strategy (IES) and introduction of the Graduate route, which have both been important in helping the UK to regain our position as the second most popular study destination in the world.

Since 2017–18, the number of international students studying in the UK has increased by approximately 45%. In 2021–22, the UK hosted a record 679,000 international students and, in doing so, met one of the key targets set out in the government’s IES. This growth should be celebrated as demonstrating the UK’s strong reputation as a leading destination for higher education.

At the same time, UK universities have increasingly been looking to diversify their international student recruitment. There are many drivers behind this shift, but moving recruitment away from a few core countries is one way that universities can help protect themselves against recruitment shocks due to circumstances outside their control.

As numbers of international students continue to increase, and universities recruit students from a wider range of markets, we must continue to be vigilant. Increased recruitment from countries which are more sensitive to economic and political changes, as well as from countries typically deemed as ‘higher risk’ by UK Visas and Immigration (UKVI) due to their higher rates of visa refusals, means that we must take
steps as a sector to manage and mitigate compliance and assurance risks. Doing so is in our individual and collective interest and helps ensure the UK’s student immigration system maintains the confidence of the public and politicians.

For their part, the Home Office and UKVI have strongly supported the higher education sector’s work to increase and diversify student recruitment – working with individual institutions on a proactive basis to both identify and address any issues or concerns, while also producing regular ‘study sector’ briefs that highlight recent trends and analysis.

It is incumbent on our sector to demonstrate that we are ready to respond accordingly, ensuring measures are in place to protect and maintain the very high levels of compliance already seen across the student immigration system.

This report offers some suggestions on how this can be done, based on the feedback of Universities UK (UUK) members. This is not intended to be an exhaustive list, nor should it be seen as a set of generic recommendations. Instead, the report should be read as a guide that can support members when considering how they manage and mitigate some of the challenges they may face when diversifying recruitment. In doing so, we hope this report helps enable long-term, sustainable growth of international students – and to safeguard the reputation of the sector.

Finally, I would like to thank all our members who took the time to respond to our survey and contribute to this report. Without your input and expertise, our work would not be possible.
Executive summary

This report sets out the findings of a survey of UUK’s membership and is intended to support the sector’s efforts to achieve both sustainable growth and diversity in international student recruitment, alongside high levels of compliance with the immigration rules.

Diversifying recruitment

- Many universities are currently diversifying their international student recruitment, including 90% of the respondents to our survey. This is in a wide range of markets, with 40 different countries mentioned by survey respondents.

- Universities are making changes to strengthen their international recruitment practices to ensure they keep pace with the changing global market and applicant behaviour, including:
  - reforming application processes
  - adapting Confirmation of Acceptance for Studies (CAS) issuance deadlines
  - setting earlier deadlines for applications and deposits
  - introducing the ability to close programmes by applications by domicile

Deposits

- Universities may wish to consider reviewing their deposit requirements alongside their diversification plans to help ensure applicants are genuine students and intent on studying.

- Almost all (96%) respondents to our survey told us that their university required deposits from at least some international students.

- Two thirds (67%) of respondents told us that their university’s deposits for international students were set at a specific monetary amount, and 17% of respondents told us they were set at a percentage of the tuition fee.
Using pre-CAS interviews

- Using pre-CAS interviews can help universities understand the motivation and level of interest an international student has in studying a particular course at a particular university.

- **57% of respondents to our survey told us that their university carried our pre-CAS interviews.** Most respondents who told us they use pre-CAS interviews told us these were only for select domiciles.

- Common elements of pre-CAS interviews include using a variety and range of questions, identity checks, and conducting interviews with a more intensive conversational element.

Dependants

- Following the marked increase in the number of dependants on sponsored study visas over the last few years, universities should consider making changes to their processes in response, including asking students about whether they have dependants that plan to travel to the UK at the point of offer so they can provide appropriate advice and better plan support for them.

- **Almost half (45%) of respondents to our survey told us that their university asked postgraduate students about whether any dependants were planning to travel to the UK.**

Working with agents

- Universities should consider how they can best work with international student recruitment agents to support diversification. Respondents to our survey told us about a wide variety of activity with agents. The most frequently mentioned was recruiting agents in new markets or using existing agents in target markets, as well as providing training and support to agents, and capping numbers for some specific programmes or domiciles.

- We strongly recommend that universities familiarise themselves with the [UK Agent Quality Framework](#) to support their work with agents and agent aggregators.

- **Over half (55%) of respondents to our survey told us that their university uses the framework.** This includes incorporating it into the design of agents’ contracts, using it to review policies and processes and use in agent training.
Sub-agents and agent aggregators

- Over half (55%) of respondents to our survey told us that their university worked with agent aggregators or agents who use a subagent model.

- Universities who do use agent aggregators or a sub-agent model may wish to consider how they can increase transparency and maintain quality. We asked respondents to our survey about how they do this, and the measure most frequently mentioned by respondents was performance assessments or monitoring. This includes reviewing metrics such as application quality and volume, enrolment ratios, non-compliance post-enrolment and visa refusals.
Introduction

Geographical diversification of international student recruitment has become a priority for many universities over recent years. Combined with the growth in the overall number of international students, universities are working hard to identify and address any challenges in international recruitment and to maintain the very high levels of compliance seen across the student immigration system.

This report is intended to support the sector’s efforts to achieve both sustainable growth and diversity in international student recruitment, alongside high levels of compliance with the immigration rules. To help do this, it suggests areas universities may wish to consider, as well as emerging best practice from our members in this area.

About this report

This report sets out the findings of a survey undertaken by UUK in February 2023 to understand how universities are diversifying international student recruitment, and what steps they are taking to maintain the high levels of trust and compliance across the student visa system.

Universities must be sure that any measures adopted comply with an institution’s legal obligations and duties, including those under the Equality Act 2010.

The survey was completed by 60 of UUK’s members, including a broad mix in terms of geography, size, and mission.

This work was also informed and supported by attendees of a roundtable on international recruitment and compliance, made up primarily of Pro-Vice-Chancellors for International from across UUK’s membership as well as wider conversations with our members. We also consulted with the UK Council for International Student Affairs (UKCISA) and British Universities’ International Liaison Association (BUILA), and are grateful for their contributions to this work.
International recruitment trends

There has been an increase in the number of international students studying in the UK over the last few years.

In 2021–22, there were 679,970 international students studying in the UK. 120,140 of these were from the EU and 559,825 were from outside the EU.

In the year ending September 2022, there were 463,315 sponsored study visas granted. This is the highest annual number of study visas granted on record, and represents both a recovery from the lower number of visas granted during the Covid-19 pandemic and an increase on pre-pandemic levels.

Before 2020–21, a consistent rise in new enrolments from China drove the growth in non-UK student numbers. In 2020–21, new enrolments from China fell for the first time in data recorded by the Higher Education Statistics Agency (HESA) (2007–08), but in 2021–22 new enrolment numbers returned to slight growth, up 0.8% from 2020–21.

New enrolments from India totalled 87,045 students in 2021–22 (up 64.2% on 2020–21), reflecting continued growth at a higher rate than in the previous year (26.8% in 2020–21).

In 2021–22, Nigeria and Bangladesh were the fastest growing sending countries, with new enrolments from these two countries increasing by 107.4% and 90.5% respectively.
According to HESA, total enrolment figures for the top 10 sending countries to the UK in 2021-22 were:

1. China (151,690)
2. India (126,535)
3. Nigeria (44,195)
4. Pakistan (23,075)
5. United States (22,990)
6. Hong Kong (17,630)
7. Bangladesh (12,700)
8. Malaysia (12,135)
9. France (11,870)
10. Italy (11,320)

For more information, please see our publication on international student recruitment data and the Home Office’s quarterly migration statistics.
Diversifying international recruitment

Data from the Higher Education Statistics Agency (HESA) demonstrates a rise in international students from a range of countries, including India, Nigeria, Pakistan, and Bangladesh. This is mirrored in our survey findings, which suggest that many universities are currently diversifying their international student recruitment.

We asked our members whether they had plans to diversify international student recruitment – for example, by seeking growth from a wider spread of source countries or changing the composition of their international cohort overall or for select programmes.

90% of respondents told us that their university currently had plans to diversify, and the remaining 10% reported that their university was considering doing this.

FIGURE 2

Does your university currently have plans to diversify international student recruitment?

- Have plans to diversify international student recruitment
- No current plans, but considering it
Key regions

We asked respondents what key regions and markets their diversification strategies were focused on. Respondents listed a very wide range of markets, including 40 different countries. The most commonly mentioned countries by respondents were the US, India and Malaysia.

Respondents also mentioned diversification to regions across the world, including North America, Africa, Central Asia, East Asia and South East Asia, Europe, Latin America and the Caribbean, the Middle East, Oceania and South Asia.

Making changes to application processes

Universities are making changes to strengthen their international recruitment practices to ensure that their recruitment practices keep pace with the changing global market and applicant behaviour. Almost half (49%) of respondents to our survey told us that their university had reformed application processes to reflect different application cycles and ‘late’ markets. A further 20% told us that they were not currently doing this but were considering it.

Respondents to our survey told us about the kinds of changes they had made to their application processes. The change most frequently mentioned was having multiple, staged application rounds throughout the year instead of one round, which was mentioned by over half of respondents to this question.

Other frequently mentioned changes were:

- adapting CAS issuance deadlines
- setting earlier deadlines for high demand courses
- setting deadlines for students’ deposit payments
- introducing the ability to close programmes by applications by domicile

Some further changes were mentioned by small numbers of respondents, including:

- reshaping marketing spend profile to support recruitment in new markets
- making improvements to information provided to applicants
- offering January starts where these were not offered previously
- encouraging early arrival of students
- setting of recruitment targets for new markets
- increasing interviews with international students to test English ability
- prioritising a wider range of subjects
- introducing compulsory personal statement scoring
- expanding capacity earlier in the application cycle
- introducing staged enrolment by course
setting additional requirements for certain markets

As well as this, half (50%) of respondents to our survey told us that their university had introduced new scholarships to support diversified international recruitment. A further 22% told us that they were considering doing this.

**Examples of emerging practice**

**Strengthening application processes**

To ensure they maintain their very high levels of compliance with UKVI metrics such as visa refusal, enrolment, and completion rates, a university has strengthened their application process and their credibility and scrutiny protocols, including increased use of pre-CAS interviews.

**Setting up a strategic group**

A university has established a strategic group to respond to the challenges of increasing international student numbers and diversification, including sub-groups tasked with recommending a range of interventions.

The sub-groups include staff working in admissions, agents, portfolio development, scholarships, and the agreed target countries.

**Expanding in-country presence**

A university has expanded their in-country presence in India and Southeast Asia and are considering further expansion in Africa, the Middle East, and the US to support diversification.

The university introduced a January intake for Postgraduate Taught (PGT) students during the pandemic to mitigate disruption as well as to capture wider market growth, particularly from markets where recruitment is typically later in the academic year.

The university is also working with more aggregators, digital recruitment platforms and subagency models for efficiency and diversification since the fast development of education technology globally.
Deposits

Universities may wish to consider reviewing their deposit requirements alongside their diversification plans to help ensure applicants are genuine students and intent on studying.

This could include introducing or increasing deposits or introducing earlier deposit deadlines.

The diversity of provision in the sector means that universities will take different approaches to requiring deposits, but they can be a helpful way of managing risk – by, for example, ensuring the seriousness of student intentions to study at the university. Increased or earlier deposits may therefore provide a more realistic enrolment benchmark, allowing university services to better consider how they meet demand.

Increased or earlier deposits also reduce the amount of tuition fees still to pay post-arrival, which may ease pressure on funding living costs and help ensure that students have access to the funds needed to undertake their studies. This may also reduce the likelihood of students transferring out of the degree programme due to the higher upfront cost.

Almost all (96%) of respondents to our survey told us that their university required deposits from at least some international students. The majority (69%) told us that these were for both undergraduate and postgraduate students. Just over a quarter (26%) told us that deposits were only required of postgraduate students. Universities that do not require deposits for some students may want to review this practice internally.
Deposit amounts

If your university does require deposits, are these set at a specific monetary amount or a percentage of the tuition fee?

Two thirds (67%) of respondents to our survey told us that their university’s deposits for international students were set at a specific monetary amount. We asked about what the specific amount was, and answers ranged from £500 to the full first year fee.

17% of respondents told us that their university’s deposits for international students were set at a percentage of the tuition fee. We asked about what the percentage charged was, and although answers ranged from 10% to 70% of the tuition fee, the most common answer was 50%, given by almost three quarters of respondents to this question.

We also asked what the approximate amount of this percentage was. Responses varied from £3,500 to £14,000, with most respondents noting that this amount varied depending on programme or level of study.

Of the 12% of respondents who selected ‘other’, most of these told us that they used both specific amounts and percentages for deposit amounts.
Use of variable deposit amounts

FIGURE 4

Does your university require variable deposits?

<table>
<thead>
<tr>
<th>By level of study</th>
<th>Yes</th>
<th>No, but considering it</th>
<th>No, and no plans to</th>
</tr>
</thead>
<tbody>
<tr>
<td>13%</td>
<td>3%</td>
<td>83%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>By domicile</th>
<th>Yes</th>
<th>No, but considering it</th>
<th>No, and no plans to</th>
</tr>
</thead>
<tbody>
<tr>
<td>23%</td>
<td>9%</td>
<td>68%</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>By programme/department</th>
<th>Yes</th>
<th>No, but considering it</th>
<th>No, and no plans to</th>
</tr>
</thead>
<tbody>
<tr>
<td>17%</td>
<td>13%</td>
<td>70%</td>
<td></td>
</tr>
</tbody>
</table>

The majority (70%) of respondents to our survey told us that their university did not currently require variable deposits by academic programme or department and that they did not plan to. 13% said that they do not do this currently but were considering it.

Of the 17% of respondents who said their university did require variable deposits by programme or department, a range of courses were referred to, with business courses most frequently mentioned. Several respondents told us that the deposit value varied depending on course specifics, such as demand or non-standard fee programmes.

A slightly higher proportion of respondents (23%) told us that their university required variable deposits by domicile. 68% told us that their university did not do this and did not plan to, and 9% said that they did not do this currently, but were considering it.
Most respondents (83%) told us that their university did not require variable deposits by level of study, with 13% saying that their university did require this. Of those who reported that their university required variable deposits by level of study, a few respondents told us that their university required higher deposits for postgraduate taught courses.

Examples of emerging practice

Managing risk of refusals

To manage the risk of refusals, a university has started asking for proof of meeting the maintenance requirements in addition to increasing deposit amounts.

Introducing different deadlines

A university has introduced different application and deposit deadlines for high demand postgraduate taught and undergraduate programmes. The university frequently re-evaluates application data and adds programmes to the earlier deadlines if demand increases.
Using pre-CAS interviews

Many universities use interviews before issuing Confirmation of Acceptance of Studies (CAS) for some international students to help better understand the motivation and level of interest an international student has in studying a particular course at a particular university.

57% of respondents to our survey told us that their university carried out pre-CAS interviews, including 45% of respondents conducting these directly and 12% using a third party or agency.

We asked respondents who they conducted pre-CAS interviews for. As shown below, pre-CAS interviews were most commonly carried out only for select domiciles.

<table>
<thead>
<tr>
<th>Description</th>
<th>Percentage</th>
</tr>
</thead>
<tbody>
<tr>
<td>Only for select domiciles</td>
<td>42%</td>
</tr>
<tr>
<td>The university does not carry out pre-CAS interviews</td>
<td>39%</td>
</tr>
<tr>
<td>Only for select programmes and select domiciles</td>
<td>12%</td>
</tr>
<tr>
<td>Don't know/Prefer not to say</td>
<td>5%</td>
</tr>
<tr>
<td>Most/All applicants</td>
<td>3%</td>
</tr>
<tr>
<td>Only for select programmes</td>
<td>0%</td>
</tr>
</tbody>
</table>

FIGURE 5

Where pre-CAS interviews are conducted, are these for:
Most respondents whose universities carry out pre-CAS interviews with applicants only for select programmes and/or select domiciles told us that they used UKVI data to identify applications from higher risk domiciles for pre-CAS interviews.

We also asked respondents about what elements their pre-CAS interviews contain. As shown in figure 6, video interviews, using a variety and range of questions and identity checks, were the most common practices amongst respondents.

**FIGURE 6**

Regarding pre-CAS interviews, which of the following does your university carry out?

- Pre-CAS video interviews: 45%
- Using a variety and range of questions in a non-formulaic order: 43%
- Identity checks at interview: 38%
- Interviews with a more intensive conversational element to verify applicant’s level of English language: 35%
- None of the above: 35%
- Video interviews with attention to signs of the applicant looking for direction off camera or lip synching: 28%
- Pre-application credibility screening calls where there is a study gap: 17%
- Other: 10%

Respondents who selected ‘other’ for this question mentioned practices such as randomised credibility screening calls and using their own English language testing. A couple of respondents told us that they did not currently carry out pre-CAS interviews, but that applicants are required to have an academic interview as part of the admissions process.
Examples of emerging practice

Introducing informative videos

A university has introduced mandatory pre-CAS videos that students need to declare they have watched before the university will issue CAS.

The videos include information on accommodation, academic conduct, fees and finance, and dependants.

The videos have had high levels of engagement and have helped manage expectations of what the university expects from students and what students can expect from the university.

Introducing additional pre-CAS checks

A university has introduced additional pre-CAS checks for some student groups, as well as earlier application and CAS deadlines. This includes pre-offer interviews for applicants who are looking to study a course at the same academic level as a previous qualification, and pre-CAS interviews for applicants for whom there is evidence of an irregular immigration history of previous visa refusals.

The university has also introduced additional pre-departure communications to ensure students are aware of expectations, including the development of an accommodation guide.

It has also started using an embedded software that supports compliance.
Dependants

There has been a marked increase in the number of dependants on sponsored study visas over the last few years. In 2022, just over a fifth (22%) of all sponsored study related visas granted were to dependants of students, compared to 6% in 2019.

FIGURE 7

Visas granted to dependants of sponsored study visa holders and percentage of all sponsored study related visas for dependants, 2019–2022

Source: Home Office
Responding to the rise in dependants

Following this greater than anticipated rise, universities should consider making changes to their processes in response to this rise in number of dependants, including asking students about whether they have dependants that plan to travel to the UK at the point of offer, so they can provide appropriate advice and better plan support for them. The importance of informing their university so that they can better support students on arrival should be emphasised in any communications, alongside a realistic assessment of, for example, the availability of suitable family accommodation and schooling for those with younger dependants.

Almost half (45%) of respondents to our survey told us that their university asked postgraduate students about whether any dependants were planning to travel to the UK. A further 17% said their university did not do this currently, but was considering it.

We asked respondents to tell us about any other practices in relation to dependants. Respondents most frequently mentioned surveying students on whether they are planning to bring dependants with them to UK. Several respondents noted that this enabled their university to provide information and advice to students, including on accommodation and university expectations, eg policies about children on campus and school places.

Accommodation

To help protect the student experience for all international students, including those bringing dependants, universities should align their international recruitment with their estates or facilities departments to facilitate better planning around accommodation and closer regional working with local authorities and other universities, particularly around accommodation suitable for families. Universities should also ensure that accommodation availability allows students to live within a reasonable distance of campus, working with local communities as required.

Universities may also wish to encourage students with dependants to travel alone initially to find appropriate family accommodation, and then invite their dependants to join them. UUK published a briefing note on supporting good practice in student accommodation in May 2023.
Changes to student immigration policy

In May 2023, the Home Secretary announced a package of changes to student immigration policy, including limiting the ability to bring dependants to the UK to international students on postgraduate research programmes. UUK will keep members updated on these changes, including timescales for implementation, and will work closely with the government as they are developed to ensure that it carefully considers the impact on the sector and certain groups of students.

Examples of emerging practice

Sharing information on dependants

A university collects information on the age of dependant children to share with local education authorities and schools, especially at primary level, in order to manage demand for school places. This information is also used to assess the demand for family housing.

When students indicate they plan to bring dependants, the university provides the student with information on the immigration health surcharge, housing shortages, school places and pregnancy.

Asking students about dependants early on

A university asks students whether they are planning to bring dependants at post-offer stage and at pre-application stage for some markets where international students tend to bring more dependents.

This data is used to provide specific information to international students to help inform decision making. This includes information on the cost of living in the local area and shortages of family accommodation locally.
Working with agents

Universities should consider how they can best work with agents to support diversification. Respondents to our survey told us about a wide variety of activity with agents. The most frequently mentioned activity was recruiting agents in new markets or using existing agents in target markets.

Respondents also mentioned:

- providing training and support to agents to support diversification, for example:
  - training on specific courses offered at the university
  - a dedicated website for agents
  - a newsletter to give agents updates
  - a virtual conference for agents
- capping numbers for some specific programmes
- including number caps for some domiciles or programme exclusions in some agent contracts
- reallocating resources to target regions, including marketing budgets
- making changes to commission of agents to incentivise diversification, eg by programme, level of study and domicile

We also asked respondents whether their university uses in-country staff or contracts a third party to undertake pre-CAS processes, such as document collection and verification. As shown in figure 8, the majority (42%) of respondents told us that their university did not do this. Almost a quarter (25%) said that their university uses in-country office staff. 18% said they did not do this currently, but were considering it.
FIGURE 8

Does your university use in-country staff or contract a third party to undertake pre-CAS processes in order to support compliance?

- No, and we have no plans to do this: 42%
- Yes, we use our in-country office staff: 25%
- No, but we are considering this: 18%
- Yes, we use both: 8%
- Yes, we use a third party agency: 3%
- Don’t know/Prefer not to say: 3%

Examples of emerging practice

Working closely with a large group of agents

A university is working with more than 200 agents from 80 different countries and regions. The university provides their agent recruitment partners with resources including:

- a dedicated university agent website
- a portal
- a monthly global agent newsletter
- ad-hoc university updates on key developments
- regional bespoke newsletters

The university regularly meets and trains agents in key recruitment markets from different regions, both virtually and in person. The university also hosts annual virtual...
agent conferences to invite global agent partners for briefings, updates and training to support diversification in student growth and subject areas.

**Working with a small group of agents**

A university works with a small and well-established network of agents for international student recruitment across their key diversity regions. Having a relatively small, knowledgeable network of representatives is an important part of the university’s recruitment strategy as it ensures that students receive dedicated and specialist counselling and portfolio development support for the university’s specialist courses.

**Working with agencies to recruit students for more diverse programmes**

A university is working with their agents to recruit to a more diverse range of programmes. For example, they have taken steps to limit numbers for very popular programmes. They also provide webinars and agent trainings for other subjects to increase agent knowledge.

**The UK Agent Quality Framework**

The [UK Agent Quality Framework](#) was developed by BUILA, the British Council, UKCISA and Universities UK International (UUKi), and is designed to enhance the partnership between the UK education sector and agents and counsellors and to recognise and promote best practice.

We strongly recommend that universities familiarise themselves with the tools and guidance and embed the quality framework into their work with agents. The framework also supports universities working with agent aggregators, including by recommending a proactive and pre-emptive approach to ensure transparency, and provides advice on contracting, due diligence and management and training of sub-agents.

Many universities are using the framework for international recruitment agents, with over half (55%) of respondents to our survey saying that their university used the framework. 22% of respondents said that their university did not yet use the framework, but was aware of it. 67% of respondents who said that their university worked with agent aggregators or agents who use a subagent model told us that they use the UK Agent Quality Framework for international recruitment.
Ways of using the framework

We asked respondents about how their universities use the UK Agent Quality Framework. Respondents most frequently told us that the framework is incorporated into agent agreements and considered in the design of agents’ contracts, and that the framework is used in agent training.

As well as this, several respondents told us that their university has used the framework to review their own policies and processes. A handful of respondents also told us that the framework is used to inform performance reviews of current agents.

Other ways of using the framework were listed by one or two respondents, including:

- incorporating it into institutional strategies and polices
- recruiting a dedicated member of staff to enact the framework
- promoting it in communications to agents and counsellors
- using it for recruitment and onboarding of agents
- making compliance with the framework mandatory for agents working for the university

Barriers to using the framework

We also asked respondents whose universities did not use the framework about the barriers to introducing it. Of the small number of respondents who answered this question, several cited timing (e.g., where the process to embed the framework would be scheduled to align with internal review mechanisms) and some cited resource as an issue. Several told us that they were planning to adopt it but had not yet done so.

Examples of emerging practice

Informing the design of new agent contracts

A university has used the UK Agent Quality Framework to inform the design of new agent contracts. The university is also in the process of educating agents about the framework, and the student guide will be included in a revamped webpage, currently under development.

Recruiting specialist staff

A university has recently recruited a dedicated Agent Compliance Manager whose role includes implementing the framework within the university’s processes for agent recruitment, management, training and commission processing.
Reviewing current agent practices

A university has used the framework to review their current agent practices at every stage, including policies, contracts, communication, management, commission and incentivisation, as well as internal staffing. The university has identified a list of changes and improvement required in the short, medium and long term.

Examples of the improvements identified include:

- combining a single agent management policy to publish on the staff intranet
- working with the university’s legal team to request additional information on the proforma and additional sections to be added to the agent contract
- investigating the potential of implementing a digital agent management platform
- developing new training materials and developing the agent website

The university is also reviewing all current agents against the framework and development timetable, as well as using a scoring rubric for reviews throughout the application cycle.

Sub-agents and agent aggregators

Over half (55%) of respondents told us that their university worked with agent aggregators or agents who use a subagent model.

Universities who do use agent aggregators or a subagent model may wish to consider how they can increase transparency and maintain quality. We asked respondents to our survey about how they do this, and the measure most frequently mentioned by respondents was performance assessments or monitoring. This includes reviewing metrics such as application quality and volume, enrolment ratios, non-compliance post-enrolment and visa refusals.

Other measures mentioned by respondents included:

- requiring agents to declare they are working with sub-agents
- asking for references for sub-agents
- detailed onboarding processes
- providing training materials to sub-agents
- setting out expectations in contracts, and using short contracts to ensure the university is happy with performance
- benchmarking performance against different aggregators and traditional agencies
- assigning a staff member responsibility for managing agent aggregators
Examples of emerging practice

Asking agents to declare sub-agents

A university’s agent contracts require agents to declare they are working with sub-agents. Agents who declare they are working with sub-agents are required to provide a list of the sub-agents on request. The contracts include a clause that the main agent is responsible for training the subagent and ensuring they are compliant with local laws and terms under the contract.

Holding monthly check-in meetings

To increase transparency and maintain quality when working with sub-agents, a university holds monthly meetings to look at conversion rates and any application issues. They also review quality and conversion rates.

Scoring personal statements has enabled earlier intervention, as it has allowed the university to identify where there are larger numbers of rejections due to weaker applications.

Ensuring transparency

For transparency, a university requires newly appointed agents to provide additional information about their operational set up, including details of sub-agency, aggregator and digital platforms. The university provides regular training and updates to agencies and then requires agencies to provide comprehensive training and guidance to their subagent network to support the submission of quality applications that are compliant with university admission procedures.

Conducting annual reviews with all agents

The university conducts an annual review with all agents, including aggregators, to monitor their performance and quality, such as their application to offer rate and application to enrolment rate. This data is benchmarked with different aggregators and traditional agencies, as well as looked at together with feedback from the university’s education team to flag any related issues of retention and student attainment.
Further resources

Universities UK, *International student recruitment: geographical diversification of markets*

Universities UK, *Supporting good practice in student accommodation: considerations for senior university leaders*

British Council, *UK Quality Agent Framework*

BUILA, *Agent Quality Framework*

Immigration Compliance Network (ICN)

UKCISA, *International student advice and guidance*
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