

Forres Sandle Manor - Agent recruitment, management and compliance policy

Policy Title	Agent recruitment, management and compliance policy
Policy Lead (Appointment (& Initials))	Head of Admissions (LB)
Date of Last Review	June 2026
Date of Next Review	September 2026

1. PURPOSE & SCOPE

1.1 This policy establishes a rigorous, legally compliant framework for the onboarding, management, and continuous monitoring of third-party international student recruitment agents ("Introducers") at Forres Sandle Manor School. The scope encompasses all institutional pipelines involving non-UK national student enrolments requiring sponsorship under the Child Student visa route.

1.2 The primary objectives of this framework are to protect the School's Home Office Student Sponsor Licence, satisfy the Independent Schools Inspectorate (ISI) standards for governance and contract oversight, fully implement the UK Agent Quality Framework (AQF) principles, and enforce a strict standard of partnership via the British Boarding Schools Network (BBSN).

2. MANDATORY AGENT ONBOARDING & VETTING PROTOCOL

2.1 Prior to executing a formal commercial contract, the Admissions department must conduct comprehensive institutional due diligence on the prospective agency.

2.2 Corporate Vetting Requirements: The prospective agent must provide:

- Official corporate registration certificates from the host territory.
- Proof of current Professional Indemnity Insurance or localized equivalent.
- Two independent, verifiable professional references from existing UK independent schools or Higher Education Institutions.

2.3 BBSN Membership Mandate: Forres Sandle Manor operates a "BBSN Preferred Partner" framework. The admissions team must securely verify the agent's active membership status directly via the British Boarding Schools Network portal. No contract may be issued to an agency whose BBSN credentials have lapsed, been suspended, or been revoked. The admissions team reserve the right to accept an agent who is not BBSN approved if they deem that they have gained satisfactory due diligence in alignment with the AQF Framework.

2.4 Sector-Endorsed Training: In alignment with the AQF, all frontline agent personnel assigned to counsel prospective families regarding the School must hold active British Council UK Agent and Counsellor Training credentials. A maximum grace period of three (3) months from contract execution is permitted to finalize outstanding certifications, after which candidate processing will be frozen.

3. UKVI LICENCE PROTECTION & PRE-CAS COMPLIANCE VETTING

- 3.1 The 5% Visa Refusal Rule: The Home Office enforces strict Basic Compliance Assessment (BCA) thresholds. A Student Sponsor visa refusal metric exceeding 5% triggers immediate mandatory licence review or revocation. The School manages this risk by holding agents directly accountable for visa outcomes.
- 3.2 Pre-CAS Financial Screening Checklist: The agent must submit an applicant's complete financial evidence packet to the School's Compliance Officer prior to the request for a Confirmation of Acceptance for Studies (CAS). Vetting must confirm that:
- The exact funds required (tuition remainder plus standard maintenance calculations) have been held continuously for a minimum of 28 consecutive days in an approved financial institution.
 - Bank statements perfectly mirror the strict technical parameters of UKVI Appendix Finance rules.
- 3.3 Genuine Student Intent Vetting: Agents must conduct and document a mock credibility interview with the applicant to verify their genuine educational intent, familiarity with the independent boarding environment, and conversational English proficiency.
- 3.4 Immigration Advice Restrictions: Agents are strictly prohibited from providing unregulated immigration advice under UK law. The agent's role is restricted to administrative document compilation unless they are formally registered with the Office of the Immigration Services Commissioner (OISC).

4. SAFEGUARDING & CONSUMER PROTECTION MANDATES

- 4.1 Child Protection & KCSIE Integration: As the School provides education and boarding to minors under 18, all agents must formally acknowledge and mirror the safeguarding principles of the UK statutory guidance, 'Keeping Children Safe in Education' (KCSIE). Any reported ethical or safety breach by an agent's personnel triggers immediate contract termination.
- 4.2 Verifiable Parental Consent: The agent must ensure that all official visa consent forms, boarding agreements, and medical release authorisations are directly executed by the biological parents or legal guardians. The agent is strictly prohibited from signing safeguarding documentation on behalf of a family.
- 4.3 Accredited Guardianship: Agents must inform overseas families that the School mandates the appointment of a UK-based educational guardian for all international boarders. The chosen guardian profile must comply with the school guardianship policy.
- 4.4 Consumer Law Transparency (CMA Compliance): To satisfy Competition and Markets Authority guidelines and the AQF, agents must explicitly disclose their commercial commission structure to families before enrolment. Hidden placement fees or double-charging is strictly prohibited.

5. PUBLIC REGISTRY AND REGULATORY DISCLOSURE

5.1 To comply with Home Office transparent recruiter mandates, the School shall maintain a up-to-date "Registry of Approved International Recruitment Partners".

5.2 The School will provide compiled lists of active, contracted agents to UK Visas and Immigration during routine audits or as demanded by active Sponsor rules.

6. CONTINUOUS MONITORING AND ANNUAL AUDITING

6.1 Every 12 months, the Admissions department will run an institutional audit on each active agent. The review scorecard tracks:

- The agent's application-to-enrolment conversion rate.
- The exact visa success metric (targeting a 0% refusal rate).
- Post-arrival feedback from international families regarding the agent's accuracy and integrity.
- Verified active standing within the BBSN global directory and active British Council training records.

6.2 Mystery Shopping and Field Auditing: The School retains the right to execute random compliance spot-checks, document reviews, or mystery-shopping exercises to ensure agents represent the School's curriculum, fee scales, and boarding parameters with complete honesty.

6.3 Immediate Contract Revocation: Any agent who breaches data security under the UK GDPR, breaches anti-bribery parameters, loses their active BBSN approved agent status, or generates a visa refusal rate crossing the 5% threshold will face immediate contract termination without a notice period.