

Agent Compliance & Responsibilities Policy

1) Purpose

This policy outlines the responsibilities, obligations, and penalties applicable to all recruitment agents who submit student applications to Book Uni Limited (herein referred to as aggregator). The aim is to ensure compliance, student quality, and protection of university and aggregator interests.

2) Agent Responsibilities

a) Student Recruitment & Application

- Ensure that all students recruited are genuine applicants with clear study intentions.
- Conduct initial screening and counselling to verify the student's academic background, financial stability, and motivation.
- Collect and submit only authentic and verifiable documents (academic, financial, identity, English proficiency, etc.).
- Ensure students understand the course, fees, visa conditions, and compliance obligations before applying.
- Prepare students for interviews ethically.
- Ongoing duty: Maintain contact with students to support enrolment and continuation.
- Transparency: Declare past refusals, academic gaps, and immigration history honestly.
- Agents are expected to supply genuine students who intend to study, not misuse the visa system.
- Supplying students who later abscond or become illegal immigrants can amount to misrepresentation, negligence, or even facilitation of immigration abuse.
- Agents are fully responsible and liable for every application submitted to the aggregator for processing to universities. Under no circumstances will the aggregator accept claims that a student was recruited through sub-agents, freelancers, or third parties. Agents must ensure that all applications and supporting documents are Genuine, complete and compliant with university and immigration requirements. The aggregator will not entertain excuses or justifications relating to visa refusals, fraudulent documentation, or misconduct attributed to third party recruitment. The submitting agent remains solely responsible.

b) Compliance with Laws & Policies

- Abide by all UKVI, university, and aggregator compliance standards.
- Avoid recruitment of students with the primary intention of immigration or employment.
- Immediately report any suspected fraudulent activity to the aggregator.

Compliance Monitoring

Aggregator will review applications, monitor enrolments, and track student performance.

Any irregularities (Fraudulent documents, false information, or students not continuing studies) will be flagged for investigation.

3) Prohibited Activities

Agents must NOT:

- Submit fraudulent or forged documents.
- Facilitate or knowingly recruit non-genuine students.
- Coach students to read scripted answers or use any unfair means during interviews or arrange for another person to attend the interview on behalf of the students.
- Misrepresent universities, courses, or visa requirements.
- Submit applications without the student's consent.

4) Penalties for Non-Compliance

Depending on the severity of misconduct, the following actions may be taken:

If an agent provides a student, whose documents are not genuine or is using any unfair means during interview or after entering the country on a student visa, leaves or absconds from the course, fails to continue their studies, or becomes illegal in the country, the aggregator suffers not only the loss of commission expected from the university for that student, but also reputational damage and termination of contract with the institution.

In such cases, the aggregator reserves the right to:

- a) Recover Financial Losses – Counterclaim from the agent the full value of the commission that would have been payable by the university for that student.
- b) Apply Monetary Penalties – Impose additional financial penalties per absconding or non-genuine student, as determined by the aggregator.
- c) Suspend Engagement – Temporarily suspend new student applications from the agent until compliance issues are resolved.
- d) Terminate Agreement – In cases of repeated or serious non-compliance, permanently terminate the partnership agreement.
- e) Blacklist and Report – Place the agent on the aggregator’s internal blacklist and, if necessary, report the agent to relevant authorities, institutions, or industry networks
- f) Withholding of Payments – aggregator will not release any commission if any student application found fraudulent or non-genuine.
- g) Recovery of Losses – if the aggregator suffers financial loss (e.g., unpaid by university), the agent will be invoiced for recovery.
- h) Blacklisting & Termination – immediate termination of contract and permanent removal from the aggregator’s network.
- i) Legal Action – in cases of fraud, forgery, or breach of contract, legal proceedings may be initiated in the UK (or agent’s jurisdiction).

5) **Liability**

- The agent is financially and legally liable for:
 - Losses incurred by the aggregator due to fraudulent or non-genuine applications.
 - Reputational damage and compliance breaches caused by the agent.
- The aggregator reserves the right to recover damages and deduct owed amounts from pending commissions or claim the amount from the agent.

6) **Monitoring & Auditing**

- All agent activities are subject to random audits, compliance checks, and student feedback reviews.
- Repeated poor performance (high visa refusals, student absconding, dropouts) may result in suspension.

1. General Commission Rules

- a) **Basis of Payment:** Unless otherwise stated, commission is calculated based on the net tuition fee (total fee minus any scholarships and bursary or discounts).
- b) **Internal Progressions:** No commission is payable for students progressing within the same university (e.g., from Undergraduate to Postgraduate).
- c) **Clawback Policy:** The university and the company reserve the right to reclaim any paid commission if a student withdraws after enrollment or fails to meet tuition fee payment obligations.
- d) **Installment Payments:** Where commission is paid in instalments by the university, the company will distribute payments to agents accordingly.

2. Fraud and Compliance Penalties

The following penalties apply to the submission of fraudulent documents or non-genuine profiles:

Global Commission Reduction: Any fake or ingenuine documentation submitted at any stage will result in a 2% reduction on all remaining cases from the standard published rate.

Verification Requirement: Failure to submit financial documents for compliance checks will reduce the commission payable for that student to 50%.

Financial Penalties per Case:

- a) **Fake Academic Documents:** £500–£3,000 per confirmed instance.
- b) **Fake Financial Documents:** £500–£3,000 per verified case.
- c) **Other Fraudulent Cases:** £500–£3,000 per confirmed instance.
- d) **Non-Genuine Students:** £500–£3,000 if a student travels to the UK but fails to register / absconds after registration.
- e) **Deduction Method:** All penalties will be deducted from current or future commission balances.

Please note that:

- a) Applications should normally be made in compliance with Book University admission procedures, including compliance with university regulations.
- b) You would not directly contact the Universities represented by Book University for student applications follow-up or any other issues.