

The role of recruitment agents in the internationalisation of higher education

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1. Introduction

Although universities have placed great emphasis on the role of agents in attracting international students from the perspective of quantity and quality of intake, there has been little recognition of the agent's possible influence on student choice, expectations and subsequent experience of academic engagement. In research with international Masters students (Magyar and Robinson-Pant, 2013), we learned that agencies and agents played a significant role in filtering information from UK universities, filling in application forms and translating or even writing personal statements. It became apparent that the agent was involved in a two-way process of conveying information provided by universities about their courses, and also mediating the student's initial interactions with the university. However, for academics involved in the admissions process, the agent's role as mediator was often invisible. Much of the research literature on student decision-making also fails to take full account of the agent's role¹.

Based on the initial findings of a scoping project funded by SRHE, this paper argues that the presence of education agents is consistent with the neoliberal commodification of higher education. Although questions have been raised about whether agents' practices are ethical, we suggest that these concerns have diverted attention from the larger processes associated with the commercialisation of higher education, which led to the need for agents in the first place. This means that until recently, little critical attention has been paid - in educational policy or research agendas - to the variety of agencies that are now fixtures in the higher education recruitment landscape and the range of services they provide. Whilst there is increasing awareness within UK university International Offices of the need to regulate and to keep abreast of agency practice, these developments and debates focus on marketing considerations and agents' performance is evaluated largely in relation to recruitment targets. As a consequence, little is known about how the presence of agents might impact on an international student's later experiences at the university, particularly in relation to teaching and learning and student engagement. This scoping project set out to reconceptualise the role of agents within the HE internationalisation policy agenda by mapping the recruitment agency landscape and looking at how to put student experience in UK universities into this picture.

¹ For instance, Hemsley-Brown (2011) analysed international students' personal statements in terms of how they reflect applicants' reading of university websites, without any suggestion that a third party might also be involved in the application process

2. Methodology

The paper is based on an SRHE-funded scoping project, which was framed around the following questions:

- How is the role of agents now being constructed?
- How has the role of agents in HE changed historically and due to what factors?
- What evidence is there of the impact of agents on patterns of student mobility?
- What is the relationship of agents with educational providers and with the state?
- What policy initiatives have been developed in various countries to regulate agents' practice?
- What evidence is there of how agents influence students' expectations of their destination HEI and decisions made?

It should be noted that in this study, we are using the term 'agent' to refer to the individual and 'agency' to refer to the organisation which employs agents in the sending country. In some contexts, the term 'agent' is used interchangeably with 'agency' and can also refer to the company, as in the following definition:

'An education agent can be an individual, company or organization that provides advice, support and placement services' (NACAC, 2013: 40).

Raimo et al (2014:5) introduce the definition of agent activity within higher education (as given on the GOV.UK website) which we found of particular relevance to our study:

- Help to sell goods abroad
- Act on the principal's behalf by introducing him/her to overseas customers
- Give information and contacts for overseas markets
- Identify opportunities
- Cut costs of setting up overseas offices

This paper draws on the findings from a literature review structured around these questions, interviews with agents (by Skype) and UK university international office staff, and analysis of agency websites (all conducted during 2014). During the first stage of the project, the main activities were focused on a literature search – comprising of academic research papers, policy documents and media reports. The majority of articles on recruitment agents were found to be in journals focusing on marketing in higher education and adopting a quantitative methodology. Policy documents setting out to regulate the practice of recruitment agents were also included in the review – the most recent being the London Statement. Documents relating to the relationship between the international office and recruitment agents were collected from within a case study university.

This material was organised into ten sections: critiquing education agents, advocates of education agents, improving practices, recruitment and marketing, recruitment and student mobility/internationalisation, recruitment and ethics, student decision making/marketing, development of regulatory bodies, empirical studies on agents and their use by students; and migration, student mobility and the globalisation of higher education. As mentioned above, a majority of the studies set out to review/evaluate the practice of recruitment agents from a marketing angle.

We also attended a university briefing session for recruitment agents, which enabled us to make face-to-face contact with agents who were visiting the UK and set up Skype interviews later on. 19 agencies were contacted at this event, representing the following countries: Turkey, South Korea, Singapore, Vietnam, Pakistan, Brazil, Hong Kong, India, Japan, Thailand, Ukraine, Nigeria and Taiwan. A documentary analysis was conducted of their agency websites and Skype interviews were conducted with 8 agents. A questionnaire was also prepared for those agents who preferred to respond by email. We later interviewed three senior members of staff in a university International Office in order to explore their roles, expectations and practices with respect to recruitment agents.

It should be emphasised that as this was designed as a scoping study, the empirical data collected was necessarily limited. Our aim in conducting the interviews was primarily to gain some first-hand insights into the relationships between agents, universities and students in order to help interrogate the literature findings from differing perspectives (including through the theoretical lenses outlined in section 6 below). Our intention is to generate research questions for a larger scale study and to gain understanding about how feasible it would be to conduct empirical research in this area, particularly given the political sensitivities involved.

3. The internationalisation of higher education and the rise of recruitment agents

UK universities have increasingly adopted a ‘mono-cultural’ model of internationalisation (Hulme et al 2013) focusing primarily on recruitment of international students as an important source of revenue, as opposed to regarding them as ‘assets to internationalisation and the generation of new knowledge and new ways of working in the academy’ (Ryan 2011: 631). Analyses of the marketisation process of higher education have revealed a narrow instrumental focus on the ways of attracting the best students (for instance, see Dill’s (2003) study in the US context). Given the increasing commercialisation of higher education, it is perhaps not surprising that there has been a dominance of what Bartell (2003) termed ‘symbolic’ over ‘transformative’ approaches to internationalisation (Robson 2011). As Tadaki and Tremewan (2013: 368) note, the internationalisation discourse is becoming ‘ever more embedded into HEIs, probably nearing the point of saturation’. Critical attention is now being given to evaluating the efficiency, effectiveness and sometimes ethical/legal aspects of internationalisation strategies - particularly with regard to attracting and recruiting international students.

However, De Vita and Case’s (2003: 238) warning about the need for an alternative approach to internationalisation is even more relevant today: ‘Despite paying lip service to various aspects of internationalisation, institutions are failing to make the most of the opportunity to engage in a radical reassessment of HE purposes, priorities and processes that student diversity and multicultural interaction provide’. Maringe et al (2013: 16) recently produced a summary of the literature on internationalisation as a framework for investigating to what extent universities are engaging with different strategies informed by six possible rationales: economic, political, socio-cultural, technological, educational and pedagogical. In the majority of institutions, this broader notion of internationalisation – as involving global citizenship, intercultural learning and teaching – is still rarely considered. As Maringe et al (ibid; 18) note, ‘internationalisation has grown alongside the marketisation of education’ so the economic rationale is increasingly dominant.

Knight (2014: 44) points out that cross-border education is ‘only one part of the complex process of internationalisation’ yet is often assumed to be synonymous. Giving an insight into the diversity of objectives and activities, she identifies ‘three generations’ of cross-border education: people mobility (first generation), program and provider mobility (second) and

education hubs (third) (ibid). Arguing that universities are not just the ‘objects’ of globalisation, ‘they are its agents’, Tadaki and Tremewan (2013:371) note that even international programmes which are ‘marketed under the rhetoric of global citizenship’ in practice turn out to have narrowly instrumental aims. Habib (2012 in Tadaki and Tremewan 2013) identifies a contradiction between the aims of some international projects (global citizenship and cosmopolitan solidarity) and the means (internationalisation industry and transnational transactions). As might be expected, the growing dominance of market values and practices within higher education has led to prioritisation of an economic rationale and instrumental approach to internationalisation in many universities, which is difficult to challenge.

Within the marketised model of higher education, recruitment agents have been playing an ever more visible and significant role, which varies according to the country context. The Observatory (2014) report that Australia and New Zealand have the longest history of working with recruitment agencies, whereas Canada has had the least involvement. Back in 1996, 46% of international students in Australia were recruited by agents (Mazzard and Hosie 1996). In New Zealand, Collins (2012: 157) suggests that agents ‘filled a niche created by the withdrawal of state regulation from student mobility and educational provision in the early 90s’. In the UK, Hulme et al. (2013:7) note a change from when agents were regarded with suspicion (before the Prime Minister’s Initiative 1 (PMI 1), launched by Tony Blair in 1999 with the aim of increasing the number of non-EU students by 75000 by 2005). There has since been a shift from a ‘cultural to a commercial rationale for intercultural exchange’ (ibid) to the current ‘free for all situation’. As Knight (2014: 44) notes in relation to cross-border education, there has been a gradual shift from ‘a development cooperation framework to a partnership model and now to a commercial and competitiveness model’.

A report commissioned by the British Council (Krasocki 2002) identified agents as crucial to meeting the recruitment targets set by PMI 1. Until then, the British Council had had counsellors in their overseas offices, who advised potential students on UK HE institutions and courses. Agents are now relied upon not only to help prospective overseas students with the process of being admitted to and attending universities, but also to help identify new markets and predict future trends (see for example, ICEF, 2013; Austrade Bangkok, 2013). With the rapid expansion of higher education, recruitment agents have now become ‘embedded in the strategies of international offices’ with universities preferring to work with their own ‘in-house’ agents (Hulme et al 2013). However, our empirical research suggested that these agents are often choosing to work with a range of universities to keep their options open. Reasons given in the literature for universities’ increasing reliance on agents include: knowledge of local networks (contacts with families and sponsors), offering information and services in local languages and dialects, cultural understanding, ability to go to remote areas, same time zone (Observatory 2014, Hulme et al 2013 and Raimo et al 2014). Recent research has suggested that younger students tend to seek the services of agents, with undergraduates most likely to use them (35% of international students at this level who responded to the survey), 34% of Masters students and only 12% of PhD students (Observatory 2014: 31). Agents often play an important ‘hand holding’ role for such students who have never been to the West and can help mediate different languages and cultural practices (Raimo et al 2014).

There is little doubt that agents are both the result of and contribute to an increasingly instrumental approach to internationalisation, based on the imperative of international student recruitment as a vital income stream. There are differing views on the likely future direction of internationalisation and the part that agents may play. Tadaki and Tremewan (2013: 368) are positive about the possibility for change and suggest that a more holistic approach to

internationalisation can be facilitated through debate in international consortia. They believe that universities are now approaching the point ‘where international activities are likely to be more strongly disciplined and ordered into a more tangible, political form. Universities will increasingly have to make decisions about which networks and international relationships are worth building and why’ (ibid). However it seems significant that their concept of internationalisation (as ‘an emergent political project that is imagined, discussed and acted out by university administrators to each other as well as other agents in and beyond the university’, ibid: 371) appears to marginalize the role of academics within these debates. By contrast, Hulme et al (2013: 12) warn about the likely tensions between academic and managerial agendas: ‘There is a danger that achievement of recruitment targets via agent activity may run ahead of thoughtful and theoretically informed internationalisation of the university curriculum’. This suggestion is supported by earlier research by Hallak and Poisson (2005) on academic fraud and quality assurance in relation to HE internationalisation, which illustrated the growing gap and sometimes conflicting priorities, between academics and managers/administrators within HEIs due to financial imperatives.

Though the rapid growth and impact of agencies on international student recruitment could be seen to have contributed to a skewed internationalisation agenda within many HEIs, their increasing visibility within internationalisation strategies has led to several recent research studies and policy initiatives. Earlier empirical studies on the operation of recruitment agencies appear limited by a lack of data: Collins (ibid: 142) notes that only two agents agreed to be interviewed for his study, indicative of sensitivities in researching this field. Since 2007, there has been an annual survey of education agents, conducted jointly by ICEF and International Graduate Insight Group i-graduate. The ‘Agent Barometer’, as this survey is called, provides information on agent size, type and the services they offer. ICEF promotes itself as a ‘market intelligence resource for the international education industry’ and these reports are very much in that spirit - the analysis of the data centred around identifying recruitment trends and providing institutions with advice on recruitment strategies. Perhaps it is for this reason that agents are willing to participate in these surveys (1194 agents in 117 countries responded to the ICEF/International Agent Barometer). Indeed, agents have also been used as a resource to find out about particular international education markets (for instance, Thailand’s Education Agents Survey Report, 2013, commissioned by the Australian Trade Commission).

Kraskowski’s (2002) report to the British Council contains an ‘agent market review’ which consists of a brief case study of China, India and Japan. She identified a typology of agents which indicates the diversity of organisations providing this kind of service:

- Travel agents who also arrange study abroad as a side-line
- Immigration agents who also arrange study abroad as a side-line
- Other people who run an overseas advisory service as a side-line to their main business
- Education specialists
- Locally employed institutional representatives, including some who are alumni of the institution they represent

(From Kraskowski, 2002: 2).

It may be that the policies and guidelines put in place since 2002 have changed the dominant profile of agencies. Certainly, our impression from talking to agents was that for most, their services were in no way a ‘side-line’.

4. The current roles of agencies and their relationships with students and universities

This section analyses studies into the perspectives of institutions, students and agents to look in more detail at the roles played by agents and the nature of their engagement with higher education institutions. We also draw on our interviews with agents and university international officers to analyse how these multiple players work together and with students.

What do agencies do?

In a report commissioned by the British Council in 2002 entitled ‘Developing the UK’s International Agent Network’, the author states that ‘agents have only a limited role in raising interest in study abroad but they play a very important role as intermediaries helping to convert interest from students ... into actual placements in institutions abroad’ (Krasocki 2002: 3). The report recommends building agent capacity. Thirteen years on, UK higher education is now far more reliant on agents to meet their recruitment targets, as indicated by this extract from our interview with an International Officer in a UK university:

‘The massive increase in agents went hand-in-hand with the increased importance of recruitment but less money to spend on doing it in-house. Now if we stopped using them we would not recruit, especially now that the US is officially embracing agents’. (From interview with International Office staff, August 2014)

The most comprehensive quantitative information regarding types and size of agencies is to be found in the annual Agent Barometer reports mentioned above, compiled and produced by the International Graduate Insight Group (i-graduate) in collaboration with ICEF. However, China is noticeably under represented, considering the large numbers of international students recruited from China: Chinese agents make up only 2.5% of the 2013 survey based on 1,194 responses representing 117 countries. According to OECD, 22% of international students enrolled in OECD tertiary education were from China (OECD, 2013): 723,000 students. So more knowledge about the practices of agencies in China is very much needed if we are to understand the impact of agents on student engagement in HE.

Agents usually work across the education sector, including with language course providers. According to the 2013 Agent Barometer survey, 50% placements were towards language courses (a proportion of which will form part of gaining a place in an HE institution and many of the providers will be based in universities). Not all agents will have been dealing with HE throughout that time. For example, we interviewed a Brazilian agency established fifty years ago which had only recently begun to offer services to students wishing to attend university abroad. By contrast, one agent we spoke to, based in Pakistan, dealt only with placing students in HE institutions.

The Barometer also gives information about agency size and from the responses, it would seem that the majority of agents are and remain small: 72% of organisations that responded comprised a workforce of between 2-10 employees. 5% of agents worked solo (Observatory 2014: 12). But these figures may only show the limitations of this kind of survey, as response patterns may be unrepresentative of the industry as a whole and also may not reflect the diversity of agencies. For example, we know that agencies in China can be on a national scale with offices in several cities. Defining agencies is also problematic. As Raimo et al. (2014) point out, there are other organisations involved in recruitment - INTO, the British

Council, Kaplan, Navitas and the UK Study Group being the largest. Reisberg and Altbach (2011) point out that the ‘agents’ category mixes those hired by university and those hired by student.

The Observatory report (2014:18) lists a huge number of services provided to students by agents: health insurance, travel insurance, visa processing, airport pick-up, language training, accommodation, application guidance, cell phones, currency exchange, school visits, internet, career counselling, referral to institutions, local job placement, programme of study selection, education exhibitions, interviews, promotional materials. Most of these services were provided free of charge, particularly application/admission guidance, programme selection and career counselling: ‘a reminder that many agents make money primarily from institutions [HEIs] not students’ (ibid). Responses from the agencies we interviewed shows that they will have varying degrees of involvement in the application process, from advising and directing students, providing lists of the necessary documentation they will require, to actually filling in forms and advising on/translating the personal statement. Most agents we interviewed provided the whole range of services to students: choosing a suitable university; contacting the university; information about language requirements and referral to language school if not part of its own services; filling in the application form; translation of documents; guidance with or translation of personal statement.

Some agents were keen to point out that they did not do anything for the student but only advised and guided them, in order to comply with the code of conduct required by the university. However, our previous interviews with students now studying on Masters courses at our university revealed that there was a diversity of practice. Indeed, it was the realisation that most students had not even glanced at the UEA website nor had direct contact with the Admissions office that led us to want to research the mediating role that agents play and its impact on the student’s subsequent academic journey. Furthermore, one needs to question the extent to which the information agents provide can be seen as entirely ‘neutral’ (see Brabner and Galbraith 2013). It can have a significant impact on student decision-making, as this extract from an interview with an international Masters student illustrates: *‘INTO’s pre-session course made me choose UEA. The agent told me that INTO offers a three month course with an exam at the end which is much easier than IELTS. INTO has a good reputation in this regard’* (from Magyar and Robinson-Pant 2013). An International Officer in a UK university explained: *‘The norm now is that agents apply on behalf of the student – the student just gives the agent all the information and they also receive the emails and forward them to the students – mostly they are very good at this and translate the university’s messages to the student because the messages can confuse the student, especially if they are international. I have been very impressed with the agencies’ communication’* (From interview, August 2014).

A major bureaucratic process for students is obtaining a student visa and much of the legislation and training for providers and agents pertains to immigration, legal requirements to keep them updated on changing regulations. However, we found that some agents were not legally allowed to give visa advice so would refer students to another agency specialising in this area. In other countries, translation of documents was passed on, as an agent explained in our Skype interview: *‘We do help for all the above things, counselling them according to their grades and the funds available. Translation of documents is done by the government authorities therefore we guide them how to do it but do not get it done on our own as it is legally not allowed. In personal statement we do guide them about the points which they should mention to explain their interest and skills’*.

The changing relationships between agents and students

In Skype interviews with agents, we discussed agents' motivations for joining this industry and their previous professional experiences, in order to begin to explore their relationship with their clients. Several agents we interviewed had themselves recently returned from studying Masters courses in the UK and explained that they drew on their *'insider knowledge'* and own experiences of HE study to advise students, for instance, to challenge clients' assumptions that *'it is really easy to study abroad'* and to encourage them to *'study hard'* (interview with agent in Japan). An agent in Taiwan had been a social worker and found her counselling skills were an asset in this job as she explained: *'some clients are picky, fussy and unreasonable, but I could handle easily with my social worker skills'*. An agent in Thailand had moved into the sector after taking a Masters in Marketing Communications in the UK. She explained how before becoming an agent she had already informally advised friends and family members who wanted to study in the UK for Masters, *'It was like a hobby of mine'*. Several of the agents observed on the differences between when they had applied for university in the UK and their clients' current expectations: *'the kids these days are too much dependent on us. Sometimes they don't even read the emails from the university and expect the agent to do everything. I tell them "you are going to study abroad, you need to read all the information yourself"'. It is totally different from my time. I had to do things for myself, the counsellor did not help that much'* (from interview with Thai agent). This agent also mentioned the increasing role that parents had in the relationship with the agent: *'my parents never came with me to the counsellor. Now it is the parents who are deciding and they come with the customer'*.

Other differences between the past and present role of agents were related to the growing commercialisation of the higher education market. An agent in Japan reflected on how little he knew about education in the UK before he took his own course as there was not much on the internet at that time. By contrast, he observed that *'now applicants are faced with too much information and they need to study it carefully'* and he saw a key role of the agent as being to help them navigate through this information. A counsellor from Taiwan was concerned about her clients' potentially unethical practices in the increasingly competitive HE market: *'Many clients tend to shop agencies and submit more than 15 applications. I hope that I could educate my clients a healthy concept about pursuing international higher education'*.

What emerged from our limited sample of agents was their dedication to the role of adviser or counsellor. Though there were occasional comments about unethical practice elsewhere (*'some agencies here behave really bad. They put their profits and interests prior to their clients'* – agent in Taiwan), the agents that we engaged with in meetings and interviews saw themselves to some degree as 'educators' helping students and their parents through the intricacies of applying for a suitable course. Previous surveys have investigated student satisfaction with agencies (for instance, see figure 19 in Observatory 2014: 40 comparing satisfaction rates for student-agent relationship to student-institution relationship) but as the Observatory report points out, 'satisfaction' could be interpreted negatively if 'students are satisfied because many agents ghost-write essays or alter grades' (ibid: 41). Our scoping research suggests the need to understand more about the relationship between students and agents and how this is changing in response to the marketisation of higher education (such as parental involvement). The relationship between the student and agent might later influence the student's experience and expectations of staff-student relationships in the UK university.

The role of agents in influencing student expectations

We were particularly interested in the impact of recruitment agents on student's expectations of their course. The first mention of education agents in the context of student decision-making appears to be Pimpa's article of 2003, which reports on a survey focusing on student decision-making, in Thailand. As with much of the student decision-making literature, the paper speaks to those involved in marketing and recruitment in Higher Education. The results indicate that agents may have a significant influence on students' decision to study abroad in the first place and then which country, institution and course of study. On the Australian government's 'studyinaustralia' site, the section advising students on education agents makes the assumption that students will approach education agents once they have already decided which country and which institution they wish to apply to:

'Once you've made the decision to study in Australia and you know where you want to study and which course you want to undertake, you can enroll directly with the institution. If, however, you need more help with the admission application process, or the Australia visa application process, you can choose to use an education agent'. From website:

<http://www.studyinaustralia.gov.au/>

But in reality, our respondents suggested that students will often approach an agent before deciding which country to study in.

According to the ESOS (Education Service for Overseas Students) framework for education providers, the purpose of providing accurate information before enrolment is 'so that their actual study experience matches their expectations' (Australian Government, Department of Education 2014). This is crucial to our argument, since in most cases of recruiting international students, it is the agent who will mediate and provide the information. Hence, agencies' education counsellors do not simply provide information but also engage with students in making decisions. We know this from talking to a number of agents but what is known is still little more than anecdotal and lacks the rigour that an ethnographic study could provide (see section 6). As mentioned earlier, empirical research on the use of agents has thus far been quantitative in orientation (see for example Pimpa, 2003). Furthermore, decision-making tends to be portrayed as a rational and linear process (for a critique of decision-making with regards student choice of Higher Education, see Menon, 2004).

From our discussions with a UK university recruitment team and with agents, it is clear that much of the information students receive will have focused on the university environment, its facilities, its position in relation to a big city. Although these aspects will of course contribute to a student's educational experience, it is unclear what students do know about the more central educational aspects such as the curriculum and approaches to teaching and learning, including assessment. One study found that although respondents cited the importance to them of approaches to teaching and learning and quality of teaching on particular courses, these were areas they knew little about (Baldwin and James, 2000). If one adds to this that agents have to keep up to date with changes in higher education at a national level, visa regulations and the high staff turnover of education counselors - coupled with the fact that education counselors are not necessarily confident English speakers or readers - it is questionable just how much students know about the course they will attend.

From our interviews with agents it would seem that students may come with an idea of what they want to study but that the decision about which country they will choose and which institution within that country is made with the help of the education counsellor. An agent in

Thailand explained: *'We try to hear what the student is looking for – how long they want to stay, how much money they have to invest.. Sometimes students want a specific university. Sometimes the student only wants to go to London – or maybe the student is on a budget.'*

Looking at the process of decision making, an UK-based international officer reflected: *'It is a bit mysterious how it works. Word of mouth I suppose. In Thailand, university X is well known for Law and a lecturer has been there and done some guest lecturing. Some students will have an idea of what they want to do, they don't come in always with a blank canvas'.* Clearly, the student's financial situation, their grades or estimated grades, coupled with institutional rankings, will determine the student's choice to a great extent. An International Officer told us: *'Some agents tell you they have all kinds of sway over the student. Other agents tell you they avoid influencing the student at all in terms of where to study'.*

Relationships between UK Higher Education Institutions and agencies

There is little empirical data as to how the relationship between institution and agent has developed over time, in terms of the current concerns regarding ethical practice and transparency. The contract between HEI and agent, and the commission paid are central to the formal relationship. The barometer survey found that commission as a percentage of student tuition fee (usually 10 – 15%) was the most common payment system (Observatory, 2014: 28). However, 75% of agencies in this survey charged fees to the students too (ibid: 36). For some countries (particularly China), the reason stated by agencies for charging a fee to the student was that otherwise the client would not think they were getting a good service (from interview with an International Officer). Both Raimo et al (2014) and the Observatory (2014) report mention the lack of transparency on the part of UK HEIs – Nottingham University was the first to publish the fees that they pay to recruitment agents (ibid).

According to the Observatory report, 29.4% of UK HEIs have issued contracts and trained agents as part of building up long-term relationships with specific agencies. Universities have developed their own procedures for selecting and working with agents. For example, in our interview, an international office staff explained: *'If a member of staff wishes to nominate a new agent, staff have to write a brief report about them and follow up references and then there is a probationary period, along with anti-bribery policy and the British Council best practice guidelines. Then a file is created for each agent. The office also creates a country activity plan for the year, which includes what visits they will be making to the agents throughout the year'.*

The relationship is not always straightforward or direct due to the number of intermediary agencies who may also be involved. For example, one agent we interviewed works with a partner agency: *'We only work with INTO. We ask for high school transcripts, the INTO test and any degree scores and then we send these to INTO. We will recommend translators for the personal statement - the enquiry goes to one of the 10 INTO universities'.* An international officer also outlined their practices in relation to INTO:

'Regarding who we would pay commission to, we only pay commission to agents who have a prior agreement with us. But there is a middle ground and that is with INTO agents. For example, we have one agent in Brazil and he is on our website, so I might refer a student to an agent, if they need more help than I can give. INTO on the other hand has between 10 and 20 agents in Brazil alone. For China the number is huge. So those INTO agents get a flat commission, which is quite a generous one compared to other universities, given [our university's] high ranking'.

Raimo et al (2014) reviewed various approaches to agency management adopted by HEIs, including the criteria used for selection. The responses (based on interviews with 57 colleagues in international offices across twenty UK HEIs) emphasised professionalism ‘which includes “*morals and ethics*”, sensible and high quality service and a professional looking website’ (ibid: 14) and the importance of meeting the potential agent. However, they also note the ‘unanswered’ questions around staff turnover, sub-contracting and resources: ‘*These are all things that essentially universities don’t know about*’ (ibid).

It is difficult to determine how and to what extent the role of agents in HE has changed over time and how this has been affected by or influenced their relationships with HEIs. It would seem that agencies have responded to, rather than instigated, the demand for levels of study and study destinations, which in turn have been shaped by broader social and economic forces. An International Officer who has worked in recruitment for the last 20 years recounted a time when there was just one agent in China for example. ‘*Agencies have always worked on a commission basis, beginning in Malaysia. At that time, universities would send or appoint their own agent. Now the majority of agents as far as we can ascertain are independent and will represent a suite of universities*’ (from interview, August 2014). We spoke to a well established agency in Brazil, celebrating its 50th anniversary but whose foray into higher education is relatively recent, its main business having been language courses abroad: ‘*We realised that students who participate in high school programmes come back wanting to continue with this experience – they already have language and experience – and this is our main target audience*’. It is clear that agencies are quick to respond to opportunities in the rapidly changing HE landscape and that HEIs face the unenviable challenge of attempting to facilitate longer-term partnerships with such agencies.

5. Policy responses: regulation and training of agents

Much of the policy-focused literature has taken the stance that agents cannot be eradicated as ‘middlemen’, focusing instead on finding ways to regulate their practices. Several national policy initiatives have been developed (see American International Recruitment Council², Education Service for Overseas Students (ESOS) in Australia³), with Australia being the most regulated market, both for education providers and education agents. For this reason, we look first here in detail at the policy initiatives adopted in Australia.

Australia’s ESOS Act is a regulatory framework set up in 2000 to protect the interests of international students (and, one assumes the reputation of Australia’s higher education industry). Its *National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students* National Code, consisting of four parts, is a legislative tool setting out the obligations of education providers, which includes aspects such as adhering to migration law and supporting what is called ‘visa integrity’. Education providers also have to be registered with CRICOS, managed by the education department of the Australian government. To register, they must comply with 15 ‘standards’ of practice, which includes the use of education agents:

‘Registered providers take all reasonable measures to use education agents that have an appropriate knowledge and understanding of the Australian international education industry and do not use education agents who are dishonest or lack integrity’.

Part D Standard 2 focuses on student engagement before enrolment:

² <http://www.airc-education.org/about-airc>

³ <https://aei.gov.au/Regulatory-Information/Pages/Regulatoryinformation.aspx>

‘Registered providers recruit students in an ethical and responsible manner and provide information that enables students to make informed decisions about studying with the registered provider in Australia. Registered providers ensure students’ qualifications, experience and English language proficiency are appropriate for the course for which enrolment is sought’⁴.

Thus policy development in Australia embraces the role of agents as a necessary and indeed welcome player in the education industry and the institutions carry the responsibility for ethical recruitment. Alongside the register for education providers, is a register of qualified education agent counsellors (QEAC), a scheme developed by the Australian government consisting of online training which covers information about higher education and visa regulations, leading to accreditation.

Looking at policy initiatives at an international level, several key moments can be identified. In 2005, UNESCO called for codes of practice pertaining to recruitment, positioning universities as responsible for the agents that act and inform on their behalf (Hallak and Poisson 2005) and this certainly underlies Australia’s approach to education agents. It is therefore surprising to see in a more recent set of guidelines, the first international initiative to address recruitment, called the London Statement (launched in 2012)⁵ to see the focus on the agents’ accountability to students, rather than on university practice and responsibilities. Referred to as an ‘ethical framework’, the statement came out of a series of roundtables, the first held in 2010, by US, Canada, UK, Australia, New Zealand and Ireland. By the time of its launch, the US and Canada had already withdrawn their support. It is composed of seven principles and signed up to by the other four countries.

Critics of the London Statement pointed out that the initiative provides no incentive to agents to comply with the code of conduct. In 2013, the British Council set up a register of those agents who had signed up to the code and undergone its training programme, with periodical assessment by the British Council that they are complying with the code of ethics set out in the Statement. Since 2006, the British Council have offered a foundation training programme for education agents, which was updated this year. They emphasise that the accreditation is for the individual agent, not for the agency to which they belong [from British Council briefing session, April 2014].

The impact of this initiative thus far is unclear. Among the small sample of agents and recruitment staff we spoke to, no one had heard of the London Statement. A brief search on the internet found references to it on Thailand’s Australian embassy site, and references following the launch in 2012, in PIE news, Times Higher Education, University World News. However, in two recent major reports on agents, little mention is made of the London Statement. The report ‘Managing International Student Recruitment Agents’ (Raimo et al 2014) sets out recommendations, which make reference to the British Council’s agents’ training. The Observatory 2014 report’s discussion of regulations and policies in Australia, Canada, New Zealand, UK and USA also makes no mention of the London Statement.

⁴ <https://aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/nationalcodepartd/Pages/ExplanatoryguideD2.aspx>

⁵ London Statement is shorthand for Statement of principles for the Ethical Recruitment of International Students by Education Agents and Consultants.
<http://www.britishcouncil.org/organisation/press/landmark-international-code-ethics-education-agents>

Although much of the data is from 2011, the roundtable discussions involving education consultants from these countries had begun by then. Perhaps the British Council register database itself will have more visibility in international offices and it is the impact of the register on institutions and agents which needs to be investigated further, rather than the London Statement itself. Certainly it is difficult to see its value to Australia, given its well-established accreditation and audit process for both agents and institutions.

A note of caution should also be raised about a certain anglo-centricism permeating much of the discussion regarding international students and recruitment. The Observatory and the British Council, and press reports about the London Statement, make reference to the attendance of the six major OECD destinations, as being US, UK, Australia, Canada, New Zealand and Ireland. OECD figures tell a slightly different story: according to its 2014 indicators (based on data from 2011), the top 6 destinations are US, UK, Germany, France, Australia, Canada, in that order. Furthermore, the London Statement is referred to as an 'international' agreement and elsewhere – as is often the case – 'international' in terms of educational *provision* tends to mean English-speaking OECD countries.

Raimo et al (2014: 16) review training provided for agents at present, particularly that provided by the British Council, as a core element of their strategy which leads to the award of the Education UK Certificate for Agents. Having attended a briefing session about the training courses now on offer – including the new continuing professional development programme – we understand that the courses focus on knowledge about visa regulations, the higher education sector and promoting ethical practice. Respondents in Raimo et al's (2014) report commented on the need for UK universities to have a greater input to the development of the British Council programme. This relates in part to the evaluation of the agent's success in terms of how many offers are converted into actual places – and the lack of knowledge about how students recruited through international students fare academically as compared to students recruited directly. The difficulty of training sufficient counsellors in institutions with high staff turn-over is noted as a greater challenge even than keeping up to date on current HE and visa requirements: *'Every time you go out you were training counsellors and you go back out and you're training counsellors again because everybody's left'* (from Raimo et al 2014: 18).

As mentioned earlier, there has been a lack of transparency on the part of universities around the commission paid to agents, demonstrating 'the presence of competition in the market between not only agents but the universities themselves' (ibid: 28). Raimo et al (2014: 29) also noted that their university respondents talked about ethics and UKCISA guidance 'more in relation to agents than the way they work with agents'. This was not our experience in interviewing university international office staff, as they revealed the real tensions and ethical dilemmas around their own professional practice arising in their dealings with agents.

There is now increasing recognition of the need for UK universities to develop greater transparency around their relationships with recruitment agents (such as publishing details of commission given) and the QAA (2012) Guidance on International Students is currently being updated to respond to such issues. Raimo et al's (2014) recommendations – particularly the tenth, 'to put the student, future and current, at the centre of agent strategies by ensuring greater transparency about the university-agent relationship' urgently needs to be addressed by all UK universities (ibid: 31).

6. Agents: a necessary evil or ‘unnecessary tax’⁶? Reframing the debates

Often portrayed in the media as unscrupulous, bartering for ever higher commission fees, in the academic domain there has also been concern about the potentially unethical practices of education agents (Baas, 2007; Hagedorn and Zhang, 2011; Lewin 2008). In the US, Reisberg and Altbach (2011: 5) even call for the eradication of education agents, arguing that by ‘outsourcing recruitment, institutions are putting their reputation and vital communication with students to a third party’. However, the majority of the research literature on recruitment agents is situated in the context of higher education marketing and recruitment, where agents are seen as crucial in competing for international students in a competitive education industry. An example is the stimulus paper by Brabner and Galbraith (2013) who argue strongly that a ban on recruitment agents ‘would not be in the interests of either the student or the university’ (ibid: 35).

Rather than only considering whether authors are arguing for or against agents, this section sets out to explore alternative starting points. Our aim here is to identify theoretical frameworks that have been developed by researchers to analyse the role of agents, as well as comparing different disciplinary perspectives. We see this as an important step within our scoping study, in order to identify conceptual frames which might help us to explore in more depth the interconnected processes of HE internationalisation, mediation between students, agents and universities and how these shape the student’s consequent experience of UK higher education.

The majority of studies that we reviewed were located within business studies or taking **marketing theory** to analyse educational processes. For instance, many draw on theory around consumer behaviour in relation to students’ decision making about HEI destinations (see for instance, Chen (2008), Cubillo et al. (2006), Simoes and Soares (2010)). Huang, Raimo and Humfrey (2014) set out to see how the agent relationship was managed by HEIs in order to contribute greater understanding of the control mechanisms used to regulate agents (for instance, trial period, audit, annual review). Using agency theory (Jensen and Meckling 1976) which examines ‘how efficiency can be achieved from the principal’s perspective’, Huang et al (2014: 3) emphasise that there are two key assumptions behind the theory: that both parties (agent and principal) will be motivated by self-interest and that agents ‘will only selectively disclose information to the principal’ (ibid: 3). Their distinction between control mechanisms used by the universities is compared with the ‘coercive’ and ‘non-coercive’ use of power by UK universities. Through this analysis, they develop a typology of five approaches adopted by HEIs towards agencies: strategic investor, market trader, flexible friends, mutual enterprise and tough banker (ibid: 13) and conclude that HEIs should avoid becoming over-dependent on agents as this will limit their ability to exercise control. Interestingly, this article points to some concerns around applying agency theory to the field of education – such as the finding that some HEI respondents are unsure that agents have even read the contracts they are sent. For us, this raised questions about the application of marketing theories to the higher education sector – and the possibility that students/administrators are not solely regarding HE as a market place. As Raimo et al point out in their British Council report (2014:6), it needs to be remembered that a university degree ‘is not just a commodity’: ‘it is not like buying a fridge which money alone can secure’.

⁶ Respondent in Hulme et al 2013, page 10

Exploring recruitment agencies through the conceptual lens of **migration and mobility** has provided valuable insights into their practices, networks and roles within the internationalisation of HE (see Baas, 2007, Collins, 2012, Hulme et al 2013). Contesting the stereotype of agents as a necessary evil, Collins (2012) widens the perspective to consider the wider role of agents in migratory processes. He suggests that whereas the literature has characterised such intermediaries as ‘either part of a solely profit-oriented migration industry or the social networks of migrants themselves’ (ibid: 136), the educational agents actually ‘bridge both worlds’. Collins’ research challenges the idea that education agents distort markets or are beyond state regulation, and by comparing them with employment agents shows the different ways in which they operate. This analysis of how international education contributes to the organisation of mobility and processes of migration suggests the value of viewing agents ‘as the connection between increasingly formalised regulatory systems, market dynamics of migration and the social lives of international migrants’ (ibid: 137).

Taking this broader lens on the role of agents could offer the potential to bring together the instrumental, financial perspectives on internationalisation with the transformative approach concerned with intercultural communication and global citizenship. Friedman and Miller-Idriss (2014) argue that mobility has ‘primarily been studied as a phenomenon of individual choice’ (ibid: 162), rather than as a ‘collective endeavour where the movement of one individual takes the work of multiple people and can serve multiple purposes as well as multiple actors’ interests’ (ibid: 153). Though these researchers were looking at the function of area studies centers in the US (rather than agents), this notion of migration as a ‘collective endeavour’ has clear implications for how we can explore the interactions between the multiple players involved in international recruitment, including the agent.

Also situated within migration studies, Brooks and Waters (2011: 135) critique the assumption from HEIs that ‘internationalisation is a highly positive process where everyone wins’ and emphasise the importance of adopting a critical geographical perspective, where ‘we are forced to acknowledge the contemporaneous plurality that exists, the relational nature of the international HE market place and the social, cultural and political implications of students’ mobilities’. They propose a new way of theorising the mobility of international students in place of only looking at students’ experience at home or abroad. Instead, we need to focus on students’ ‘power to move from a to b’ and the resources (such as the recruitment agent) that enable or disable mobility. Brooks and Walters’ research illuminates the multiple agencies and identities negotiated by international students as they move between places. Although these authors do not investigate recruitment agents, this approach could help to situate agents within wider networks and discourses.

Within a policy context, analysing the agent’s role through migration theory can contribute understanding into the dilemmas about how to market higher education overseas. Through research with Indian students in Australia, Baas (2007) explores the implications for institutions of viewing education for migration purposes. Although many students in his study referred to colleges as ‘PR factories’ (Permanent Residency), conferences and recruitment fairs avoided the topic of migration: ‘migration almost seemed a non-topic, something those in the business of education knew they were not supposed to talk about’ (ibid: 55). Baas reveals how migration and employment options were influencing the curriculum in many colleges (for instance, proliferation of hair dressing and catering courses), yet publicity websites avoided any questions on permanent residency. However, both agents and HEIs clearly recognised the interconnections between the migration and the education markets.

In order to explore the micro-level processes of negotiation between agents, students and university recruitment staff, we turn to the fields of **intercultural communication and academic literacies**. Researchers on intercultural communication (Holliday 1999, 2011; Holliday, Hyde and Kullman 2004) have challenged an essentialist notion of ‘culture’ and proposed instead ways of exploring ‘how and when culture plays an active role in shaping and influencing our meaning making endeavours’ (Sarangi 1995: 26). Taking this perspective on both the ideas of ‘culture’ held by HEIs and by agents could provide valuable insights into how both HEIs and agents construct ‘English values’ (Raimo et al, 2014 – respondent), influencing how the student will negotiate multiple policy and academic cultures through their journey to UK higher education. From our limited investigation into the field of recruitment agencies, we have noticed that the term ‘culture’ remains unproblematised in discussions about international recruitment and agents – with both agents and HEI international offices sharing a dichotomised and essentialised view of the student’s ‘home’ culture as contrasted with ‘English’ culture. Our initial discussions with agents suggested however that practices and values in the student’s ‘home’ culture were changing rapidly (such as the increasing dependence on parents and agents) and that a more dynamic model for theorising about cultural and social change would be helpful.

Academic literacies researchers have studied communicative practices in higher education institutions, adopting what has been termed a ‘situated’ or ‘social practice’ approach (Street 1993). The focus on literacy practices and texts, and particularly ‘the relationships of power, authority, meaning making... that are implicit in the use of literacy practices within specific institutions’ (Lea 2004: 6), offers a way of analysing how students and agents work collaboratively with certain texts, such as reading university websites or writing a personal statement. Most academic literacies research has investigated the relationship between the university-teacher, student and text from this perspective (e.g. Ivanić’s (1988) study of a mature learner). Moving outside the university classroom, Robinson-Pant and Street (2013) researched university ‘bureaucratic literacies’ to explore how relationships between doctoral student and supervisor might be shaped by the ‘new’ literacy practices associated with regulation and accountability of universities (such as research ethics protocols and formal minutes of supervision meetings). Taking this lens on the ‘new literacies’ which have been introduced through agency regulation and training could provide greater insights into the complex and changing hierarchical relationships between agents, students and HEIs.

Turning to **ethnographies of communication**, the concepts of ‘literacy mediation’ and ‘literacy brokers’ could be used to explore the specific ways in which students, agents and university international office staff construct and interpret texts through the recruitment process. Blommaert’s (2004) study of the texts written as part of an application by a Burundese asylum-seeker in Belgium reveals how such micro-level analysis might contribute greater understanding into how agents act as mediators between the UK university and the student. Blommaert (2004: 660) examines what he terms a ‘clash of two different economies, one guiding the production of the [application] documents and the other guiding their uptake’. His notion of the text being produced ‘in a transnational context: a Burundese subject producing text in Belgium addressed to Belgian legal officials’ (ibid) has clear relevance to the situation of international student applicants too. We suggest that this kind of analysis could help shift the emphasis within debates on the role of international agents, from evaluating ‘who does what’ (such as whether or not the agent wrote the personal statement) to a more complex understanding of what actually happens when texts move ‘from the peripheries of the world system to its centres’ (ibid: 661). When reading application forms, there is a tendency to try to identify the ‘true’ voice of the student – as Blommaert questions

in the context of the Burundian paper, ‘How do we get to the fullness of voice-as-knowledge in such documents?’ We need to recognise that authorship may be collective and that texts may be read, written and interpreted very differently when writing styles and conventions ‘get transferred from one particular social, cultural, communicative and linguistic environment to another’ (ibid: 644). Developing a framework around the geopolitics of text production and ethnographies of communication offers an appropriate approach for investigating in more depth the recruitment agent’s role in the globalised economy of higher education.

7. Conclusion: future directions

This discussion paper has introduced several key concepts that we could use to frame future investigation into the role of recruitment agents in the internationalisation of higher education. The new migration paradigm (discussed by Brooks and Waters) suggested the importance of taking a broader perspective on the economic, social and political processes influencing student migration and looking at how students engage with multiple actors and resources (including the agent) as they move between countries. The concepts of intercultural communication and literacy mediation provide tools for analysing the micro-level practices with which students, agencies and universities engage during the decision-making and recruitment process. Ethnographies of communication could contribute insights into how discourses of internationalisation are constructed, through situated analysis of literacy practices and texts in both UK HEIs and agency offices.

Our research for this SRHE scoping project has so far revealed a diversity of agency practices, for example, in terms of their origins, breadth and nature of institutions for which they are recruiting and types of services offered. It also points to a complexity of relationships between the different players. The growing importance of recruitment agents can be seen as a direct result of an increasingly instrumental approach to internationalisation, responding to what we regard as an over-emphasis within internationalisation strategies on international student recruitment as a major source of income. From the reports cited in this paper and from our empirical research, it is clear that agents are not a homogeneous group and there is now greater understanding about their differing functions, forms and relationships with HEIs. Too often within university policy strategy, ‘internationalisation’ is taken as synonymous with ‘international recruitment’ and much of the research on agents has to date been framed within a recruitment and marketing discourse. This has contributed to a growing gap between the concerns of academic staff and those colleagues working in university international offices.

Critical investigation into the role of education agents in shaping student expectations is important not just to bridge this gap but also for generating insights into the ways that HE is being transformed due to commercialisation and the implications for enhancing student experience, admissions processes and internationalisation strategies. This relates to our own learning during this scoping project as we became aware of the extent to which university managers and administrators had such contrasting priorities, concerns, values and deep knowledges (relating to international markets and practices) as compared to our own perspectives. They were tackling difficult ethical issues around recruitment practices that we as academics were previously unaware of. Conversely, we realised that international offices had little knowledge of what happened after students arrived on their courses – as their involvement ended at the point of ‘conversion’ of offers into places. This scoping study suggests that research into agents’ roles in mediating communication (texts often produced

and read by academics as well as by international office staff) and student expectations could help to facilitate closer interaction between international office staff and academics working with international students recruited in this way. Drawing on the concept of literacy broker to analyse the agent-client relationship and on migration studies to explore student mobility, we propose to develop a wider perspective on internationalisation - which embraces the curriculum and intercultural learning, in order to bridge the gap between HE international recruitment offices and the academics responsible for teaching and learning.

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Anna Magyar and Anna Robinson-Pant, December 2014

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