

This document sets out the general principles of cooperation and expectations by Twin Training International of educational agents working with the group for the recruitment of international students. It is meant as a guide as to general principles and it is expected that agents will maintain the highest standards of integrity, honesty and professional conduct at all times, and will abide by the specific terms and conditions set out in their contracts. Agents should always act in good faith and with fairness, consideration and objectivity.

The following sets rules of conduct as applying to educational agents, whether acting as sole proprietors, partnerships or limited companies. Where an agent is an entity with multiple employees, the principal or director must ensure that the contents of this Code of Conduct are effectively relayed to all employees and that comprehensive and regular training on implantation implementation and compliance is provided to all employees / representatives.

## **Agents are expected to:**

1. Agents must do nothing to support or encourage illegal actions. Accurately represent areas of competence, education, training and experience. Maintain the confidentiality and integrity of information about students and communications with students. Agents must always comply with local data protection laws and any policy of the adviser's employing organisation on confidentiality and record keeping, as well as the provisions of the UK Data Protection Act 1998 (as per advice and training provided by Twin). Agents should ensure that information about any circumstances in which information may be disclosed without prior authorisation is available to students.
2. Establish appropriate resources and procedures needed to provide professional support services to international students and institutions.
3. In particular, keep themselves informed, as may be relevant to their areas of advice, of developments in statutory and case law, regulations, immigration rules and procedures, Institutional policies and other codes through Continuing Professional Development. Agents should be aware of the difference between information, advice and counselling and be able to recommend qualified counselling assistance to students who may benefit from it.
4. Recognise the boundaries of their qualifications and competence, making appropriate referrals when situations fall outside them. Agents must not, however, provide advice which is subject to regulation unless they are appropriately accredited / licensed to provide such advice (e.g., immigration advice which is subject to OISC regulation). It must always be made clear to students what kind of advice the agent is authorised to provide
5. Be accountable to both Twin and their students, and publicise a complaints and dispute resolution procedure.
6. Actively seek to promote personal professional development and keep themselves and their staff informed of current developments in their fields.
7. Provide both Twin and students with information they need in a timely manner and not withhold relevant information.
8. Provide a representative voice regarding issues that are of importance to students when on a Twin programme.
9. Provide the range of services required by their agreement with Twin to ensure cooperative delivery of quality support to international students.
10. Respond to student and Twin communications in a prompt and timely manner.
11. Not discriminate, or tolerate discrimination on the part of others, on the basis of ethnic or national origins, gender, sexual orientation, religion, disability or age.
12. Be aware of, and show appropriate sensitivity to and respect for, other cultures and value systems.
13. Act in the best interests of the student, while respecting institutional policies, statutory and legal requirements and the legitimate interests of sponsors.
14. Be principally concerned with the personal, social, educational and career needs of the students.
15. Advertise in strict adherence with the schedules provided by Twin (as annex to the agreement) and in any case, advertise in an ethical manner by not engaging in false, misleading or damaging advertising.
16. Continually monitor their own effectiveness and the effectiveness of their staff as professionals and take steps to improve when necessary.