

# 15. Marketing and Student Recruitment

**ELI Schools**  
elischools.com



## 15. Marketing and Student Recruitment

### Introduction

Marketing and student recruitment are critical functions that directly impact ELI Schools' reputation, student enrolment, and long-term sustainability. These activities must be conducted with the highest standards of integrity, transparency, and ethical practice to:

- Protect prospective students from misleading or inaccurate information
- Maintain trust with students, parents, agents, and regulatory bodies
- Comply with the Code of Practice for Provision of Programmes of English Language Education to International Learners
- Uphold the principles of the London Statement: Ethical Principles for Recruitment
- Safeguard student financial investments
- Maintain ELI Schools' reputation and authorization to operate
- This section establishes ELI Schools' framework for ethical marketing and recruitment practices, and for protecting students' financial interests through appropriate insurance and escrow arrangements.

### Scope and Context

ELI Schools markets and recruits' students through multiple channels:

#### Business-to-Business (B2B):

- **Educational Tour Operators (Agents):** Independent agencies and education consultants who represent ELI Schools to prospective students in various countries
- **Partner institutions:** Schools, colleges, universities that may refer students

#### Direct-to-Consumer (D2C):

- **ELI Schools website:** Information, brochures, booking system
- **Digital marketing:** social media, search engine marketing, email marketing, online advertising
- **Sales team:** ELI Schools staff who communicate directly with prospective students and parents

All channels must operate according to the same ethical principles and standards.

### Regulatory Framework

ELI Schools' marketing and recruitment practices are governed by:

- The London Statement: Ethical Principles for Recruitment
- Code of Practice for Provision of Programmes of English Language Education to International Learners

## 15.1 Policy on Marketing and Ethical Student Recruitment

<b>QA Area(s)</b>	• Public Information and Communication • Programmes of Education and Training • Learner Recruitment and Admission		
<b>Applies to</b>	<input checked="" type="checkbox"/> Staff only	<input type="checkbox"/> Learners only	<input checked="" type="checkbox"/> Staff and learners
<b>Policy Owner</b>	Marketing Manager		

### Purpose

This policy establishes ELI Schools' commitment to ethical, honest, and transparent marketing and student recruitment practices that comply with the London Statement: Ethical Principles for Recruitment and the Code of Practice for Provision of Programmes of English Language Education to International Learners.

### Scope

This policy applies to:

- All marketing materials produced by or on behalf of ELI Schools (print, digital, video, social media, website)
- All recruitment activities conducted by ELI Schools staff (Sales Managers, admissions staff, management)
- All agent relationships (Educational Tour Operators and education consultants)
- All channels: Business-to-Business (agents) and Direct-to-Consumer (website, digital marketing, sales team)
- All locations and markets where ELI Schools operate or recruits' students

### Policy Statement

#### Commitment to Ethical Recruitment:

ELI Schools is committed to the highest standards of ethical practice in all marketing and recruitment activities. We believe that:

- Prospective students and their families have the right to accurate, complete, and honest information
- Trust is the foundation of successful student relationships
- Ethical recruitment protects students, enhances our reputation, and supports sustainable business
- Compliance with ethical standards is non-negotiable

#### The London Statement: Ethical Principles

ELI Schools endorses and commits to upholding the London Statement: Ethical Principles for Recruitment, which establishes international best practice for ethical student recruitment. The London Statement principles include:

- **Honesty and Transparency:** All information provided to students is accurate, truthful, and not misleading
- **Clarity:** Information is presented clearly and in language students understand
- **Fair Treatment:** All prospective students treated fairly regardless of nationality, background, or recruitment channel
- **Student Welfare:** Student interests prioritized above commercial considerations
- **Professional Conduct:** Staff and agents conduct themselves professionally and ethically
- **Respect for Rights:** Student rights respected throughout recruitment and enrolment process

## Core Principles of Ethical Marketing and Recruitment:

### 1. Accuracy and Honesty

#### All Marketing Materials Must Be:

- **Accurate:** Information about programmes, fees, facilities, accreditation, and services is factually correct
- **Up to Date:** Information is current and reflects ELI Schools' actual offerings and conditions
- **Honest:** No false or misleading claims about quality, outcomes, or student experiences
- **Evidence-Based:** Claims about success rates, student satisfaction, or outcomes are supported by verifiable data

#### Prohibited Practices:

- False or exaggerated claims about programme quality or outcomes
- Misleading use of images (e.g., showing facilities not owned by ELI Schools without clear indication)
- Promises or guarantees that cannot be delivered (e.g., "guaranteed job placement", "guaranteed exam success", "guaranteed visa approval")
- Misrepresentation of accreditation, authorization, or regulatory status
- Use of outdated information that no longer reflects current offerings
- Testimonials or reviews that are fabricated or incentivized without disclosure

### 2. Transparency in Information

#### Essential Information Clearly Communicated:

All prospective students must have clear access to:

- **Programme information:** Content, duration, timetable, CEFR levels, entry requirements
- **Fees:** Full costs including tuition, registration, examinations, materials; additional costs for accommodation, activities, insurance
- **Refund policy:** Conditions under which fees are refundable or non-refundable
- **Terms and conditions:** Student obligations, school policies, visa requirements
- **Accreditation and authorization:** ELI Schools' regulatory status, accreditations held, membership of professional bodies
- **Facilities and services:** Accurate description of premises, accommodation, student services
- **Location and accessibility:** Clear information about school locations, transport links
- **Visa requirements:** For non-EEA students, clear explanation of visa requirements and process

#### Information Accessibility:

- Information available before enrolment decision is made
- Available in appropriate languages for key markets
- Easy to find on website and in communications
- Provided in writing (email, brochure, website) not just verbally

### 3. Fair and Respectful Treatment

#### All Prospective Students:

- Treated with respect regardless of nationality, age, gender, background
- Given equal access to accurate information
- Not subjected to high-pressure sales tactics or coercion
- Allowed adequate time to make informed decisions
- Provided with clear answers to questions
- Have inquiries responded to promptly and professionally

#### **No Discrimination:**

- Marketing and recruitment practices do not discriminate
- All eligible students welcomed regardless of nationality or background
- Pricing fair and transparent (no hidden costs or discriminatory pricing)

#### **4. Responsible Agent Management**

##### **Educational Tour Operators (Agents) as Partners:**

ELI Schools works with agents in various countries to reach prospective students. Agents are independent businesses, but they represent ELI Schools and must uphold our ethical standards.

##### **Agent Selection:**

Agents selected based on:

- Professional reputation and ethics
- Experience in education recruitment
- Financial stability
- Compliance with local laws
- Commitment to ethical practices
- Understanding of ELI Schools' standards

##### **Agent Agreements:**

- All agents sign formal agreements with ELI Schools

Agreements specify:

- Agent obligations to provide accurate information
- Prohibition on misrepresentation
- Requirement to comply with London Statement principles
- Commission structure (transparent, reasonable)
- Monitoring and audit rights
- Termination conditions for breaches

##### **Agent Training and Support:**

ELI Schools provides agents with:

- Accurate, up-to-date marketing materials
- Regular training on programmes, policies, visa requirements
- Updates on any changes
- Direct contact for questions
- Support in providing accurate information to students

##### **Agent Monitoring:**

- Regular monitoring of agent performance and practices
- Collection of student feedback about agent services
- Investigation of complaints about agents
- Action taken against agents who breach ethical standards

##### **Agent Commission:**

Commissions paid to agents are:

- Transparent and disclosed
- Reasonable and industry-standard
- Not so high as to incentivize unethical recruitment
- Paid after student enrolment and commencement, not based on inquiries
- Students not charged extra fees to cover agent commission

## 5. Direct Marketing and Sales Practices

- Website:**
- ELI Schools website provides comprehensive, accurate information
  - Easy navigation to key information (programmes, fees, accommodation, admissions)
  - No misleading design or hidden information
  - Privacy policy clear and compliant with GDPR
  - Inquiry forms secure and data handled appropriately
- Digital Marketing:** Social media, search ads, email marketing comply with:
- Accuracy standards (no misleading ads)
  - ASA (Advertising Standards Authority) codes
  - Platform-specific rules
  - Data protection laws
  - Paid advertisements clearly labelled
  - Influencer partnerships disclosed
  - User-generated content moderated for appropriateness
  -
- Sales Team:** ELI Schools sales staff:
- Trained on ethical recruitment principles
  - Provide accurate information
  - Do not use high-pressure tactics
  - Allow students time to consider options
  - Respect "no" and do not harass prospective students
  - Record communications appropriately
  - Follow up professionally and appropriately
- Prohibited Sales Tactics:**
- High-pressure tactics (e.g., "offer expires in 1 hour")
  - False urgency (e.g., "only 2 spaces left" when more available)
  - Misrepresenting competitor offerings
  - Making promises beyond our control (visa approval, job placement)
  - Contacting students excessively or without consent

## 6. Handling Inquiries and Applications

- Responsive Communication:**
- All inquiries responded to within 48 hours
  - Professional, helpful tone
  - Accurate information provided
  - Questions answered fully
  - Referral to appropriate staff if specialist knowledge needed
- Application Process:**
- Clear, straightforward application process
  - Requirements clearly stated
  - Timeline for decision communicated
  - Decisions made fairly and consistently
  - Reasons for rejection provided where appropriate
- Pre-Arrival Information:** Students receive comprehensive pre-arrival information including:
- Programme details and what to expect
  - Accommodation arrangements
  - Arrival procedures
  - Visa guidance
  - Contact information
  - Student handbook
  - Terms and conditions

## 7. Protection of Prospective Student Data

- GDPR Compliance:**
- Prospective student data collected, stored, and used in accordance with GDPR
  - Clear privacy notices provided
  - Consent obtained for marketing communications
  - Data security maintained
  - Rights to access, rectification, erasure respected
  - Data not shared with third parties without consent (except agents where student engaged agent)

## 8. Quality Assurance and Compliance

- Marketing Materials Approval:**
- All marketing materials reviewed and approved before use
  - Marketing Manager ensures accuracy and compliance
  - Regular review and update of materials
  - Withdrawal of outdated or inaccurate materials
- Staff Training:**
- All staff involved in marketing and recruitment receive training on:
- Ethical recruitment principles
  - London Statement
  - Code of Practice requirements
  - ELI Schools' policies and standards
  - Accurate information about programmes and services
  - Training refreshed annually
- Monitoring and Review:**
- Regular monitoring of marketing and recruitment practices
  - Review of student feedback and complaints
  - Mystery shopping or audits of recruitment processes
  - Agent monitoring and feedback
  - Annual review of policy and practices
- Complaints:**
- Students can complain if they received inaccurate information or experienced unethical recruitment
  - Complaints investigated thoroughly
  - Action taken to rectify issues
  - Learning applied to prevent recurrence

## 10. Accountability

### Responsibility for Ethical Practices:

- Marketing Manager:**
- Overall responsibility for marketing and recruitment ethics
  - Ensuring all materials accurate and compliant
  - Training and supervising marketing staff
  - Creating, monitoring and publishing all marketing content
  - Reporting to management
- Sales Managers:**
- Implementing ethical recruitment practices in sales activities
  - Monitoring agent conduct
  - Investigating complaints
  - Training sales team
  - Monitoring sales team conduct
  - Ensuring CRM and communications compliant
  - Addressing individual breaches
- All Staff:**
- Personal responsibility to uphold ethical standards
  - Not engaging in or condoning unethical practices
  - Reporting concerns about unethical recruitment

### Consequences of Breaches:

- Staff who engage in unethical marketing or recruitment practices subject to disciplinary action
- Agents who breach ethical standards may have agreements terminated
- Serious breaches may result in dismissal or contract termination

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<b>Approved by</b>	Board of Directors
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### Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- The London Statement: Ethical Principles for International Student Recruitment
- Consumer Rights Act
- Consumer Protection from Unfair Trading Regulations
- Advertising Standards Authority (ASA) Codes
- Data Protection Act 2018 and GDPR
- Competition and Consumer Protection Act 2014

## 15.2 Procedure for Marketing and Ethical Student Recruitment

<b>QA Area(s)</b>	• Public Information and Communication • Learner Recruitment and Admission
<b>Applies to</b>	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
<b>Policy Owner</b>	Q Policy on Marketing and Ethical Student Recruitment

### Purpose

This procedure outlines the operational steps for ensuring all marketing materials and recruitment activities comply with ethical standards and the Policy on Marketing and Ethical Student Recruitment.

### Procedure

#### PART A: MARKETING MATERIALS CREATION AND APPROVAL

##### 1. Creating Marketing Materials

When new marketing materials need to be created (brochure, website content, advertisement, social media post, video, etc.):

##### Step 1: Content Development

Marketing staff or external agency:

- Draft content based on accurate, current information about programmes, fees, services

Source information from:

- Programme documentation (approved programme specifications)
- Current fee schedules
- Facilities and services available
- Accreditation and authorization documentation
- Current student feedback and testimonials (with consent)
- Ensure all factual claims can be evidenced
- Use clear, accessible language appropriate to target audience
- Avoid superlatives or exaggerated claims unless substantiated

##### Step 2: Visual Content

If materials include images or video:

- Use only images of actual ELI Schools facilities, staff, students
- If stock images used, ensure they don't misrepresent (e.g., don't show facilities that aren't ours)
- Obtain consent from students/staff featured in images
- Ensure images reflect diversity and inclusion
- Comply with child safeguarding requirements if featuring under 18s

##### Step 3: Legal and Compliance Check

Before approval, content reviewed for:

- Accuracy of all factual information
- No misleading or false claims
- Compliance with ASA codes
- Appropriate disclaimers (e.g., "Visa approval not guaranteed")
- GDPR compliance (privacy notices, consent)
- No discriminatory language or imagery

##### Approval Process

##### Approval Levels:

**Minor updates (e.g., social media post, blog article, email template):**

Reviewed by Marketing Manager OR designated senior marketing staff

Checklist used:

- Information accurate?
- No misleading claims?
- Complies with brand guidelines?
- Appropriate for target audience?
- No errors (spelling, grammar)?

Approved: Sign-off recorded (email approval or signature on proof)

### Major materials (e.g., new brochure, website redesign, major campaign):

- Reviewed by Marketing Manager
- AND reviewed by Academic Coordinator (for programme information accuracy)
- AND reviewed by Managing Director (final approval)
- Formal approval meeting may be held
- Approval documented in writing
- Changes made based on feedback, then final sign-off

### Agent-specific materials:

- Agent brochures, commission materials, contracts
- Reviewed by Marketing Manager
- AND reviewed by Managing Director
- Legal review if contract terms included

## 2.2. Approval Documentation:

Marketing Manager maintains **Marketing Materials Approval Log**:

Date	Material Description	Type	Created By	Reviewed By	Approved By	Approval Date	Status	Notes
[Date]	Summer 2024 Brochure	Print	[Name]	Marketing Mgr., Academic Coord	Managing Dir	[Date]	Approved	✓

## 3. Updating and Withdrawing Materials

Marketing materials reviewed regularly:

- Annual review of all major materials (brochures, website)
- Quarterly review of frequently changing content (fees, dates)
- Immediate review when relevant information changes (accreditation, facilities, programmes)

When information changes:

- Outdated materials withdrawn immediately
- Online content updated within 48 hours
- Print materials reprinted or stickered with updates
- Agents notified of changes and provided with updated materials

Withdrawal process:

- Marketing Manager identifies outdated materials
- Issues withdrawal notices to all relevant parties (agents, sales team, offices)
- Destroys or archives outdated print materials
- Updates online content
- Documents withdrawal in Approval Log

## Part B: Agent Recruitment and Management

**4. Appointing New Agents** When a prospective agent approaches ELI Schools OR ELI Schools identifies potential agent:

- Step 1: Initial Assessment** Sales Manager conducts preliminary assessment:
- Research agent company (website, reputation, reviews)
  - Assess experience in education recruitment
  - Check if agent works with competitors or similar institutions
  - Evaluate professionalism of inquiry
  - Decision: Proceed with due diligence OR decline
- Step 2: Due Diligence** If proceeding, Sales Manager requests:
- Company registration documents
  - References from other education providers
  - Agent's standard practices and ethics statement
  - Details of recruitment territories and methods
  - Commission expectations
- Sales Manager verifies:
- Company legitimately registered
  - References check out (contact provided references)
  - No history of unethical practices
  - Appropriate fit for ELI Schools
- Step 3: Meeting and Agreement** Sales Manager (and/or Managing Director):
- Meets with agent (video call or in person)
  - Discusses ELI Schools' ethical standards and expectations
  - Reviews programmes, fees, services
  - Explains London Statement principles
  - Provides draft Agent Agreement for review
- Agent provided with:
- ELI Schools Agent Training Guide
  - Marketing materials and programme information
  - Terms and conditions
  - Access to agent portal (if applicable)
- Step 4: Contract Signing** If both parties agree to proceed:
- Agent Agreement finalized (legal review if significant terms)
  - Signed by both parties
- Agreement specifies:
- Services agent will provide and territories covered
  - Discounting or commission rates and payment terms
  - Ethical standards and compliance requirements
  - ELI Schools' right to monitor agent
- Step 5: Agent Onboarding** Marketing Manager provides:
- Training session (online or in person) covering:
- ELI Schools programmes in detail
  - Admissions procedures
  - Visa requirements
  - Fees and refund policy
  - Ethical recruitment practices
  - How to use provided marketing materials
  - Communication channels
  - Agent added to communication lists
  - Agent added to **Agent Register** (database of all active agents)

**Ongoing Agent Management****Regular Communication:**

Sales Manager maintains regular contact with agents:

- Monthly newsletter with updates
- Quarterly webinars or training sessions
- Immediate notification of important changes (fees, programmes, policies)
- Responsive to agent queries (respond within 24-48 hours)
- Annual in-person visit or comprehensive review call

**Providing Support and Materials:**

Marketing Manager ensures agents have:

- Current, accurate marketing materials
- Updated programme information
- Fee schedules
- Sample offer letters
- Visa guidance documents
- Access to school staff for questions

**Monitoring Agent Performance and Conduct:**

Sales Manager monitors agents through:

**Quantitative Monitoring:**

- Number of inquiries generated
- Number of applications submitted
- Conversion rates
- Student enrolment numbers
- Commission paid

**Qualitative Monitoring:**

- Quality of applications (complete, appropriate students)
- Student feedback about agent (collected during induction)
- Communication professionalism
- Compliance with procedures
- Any complaints received

**Annual Agent Review:**

Each agent reviewed annually:

Sales Manager completes **Agent Performance Review:**

- Enrolment numbers and trends
- Quality of students recruited
- Professionalism and communication
- Compliance with ethical standards
- Student feedback summary
- Any issues or concerns
- Recommendations: Continue relationship / Improve performance / Terminate
- Review discussed with agent

## 6. Addressing Agent Compliance Issues

If concerns arise about agent conduct (providing inaccurate information, misrepresenting ELI Schools, unethical practices):

**Step 1: Identify Issue** Issue may be identified through:

- Student complaint
- Agent communication that raises concerns
- Mystery shopping or audit
- Third-party report
- Marketing Manager documents:
- Nature of concern
- Source of information
- Evidence available
- Seriousness of issue

**Step 2: Investigate** Sales Manager:

- Contacts agent to discuss concern
- Gathers agent's perspective
- Reviews evidence
- May contact affected students for details
- Assesses whether breach of agreement occurred

**Step 3: Action** Based on investigation:

**Minor issue (e.g., outdated information inadvertently shared):**

- Informal discussion with agent
- Reminder of correct information
- Request for correction
- Monitoring to ensure resolved
- Documented but no formal action

**Moderate issue (e.g., misleading claim made, procedure not followed):**

- Formal written warning to agent
- Clear explanation of breach
- Requirement to correct immediately
- Enhanced monitoring
- Warning that repeat will result in termination
- Documented and added to agent file

**Serious issue (e.g., deliberate misrepresentation, unethical recruitment, data breach):**

- Immediate suspension of agent (no new students)
- Formal investigation
- Written notice of breach
- Termination of agreement if breach confirmed
- No further commission paid
- Students recruited by agent contacted to verify information they received
- Documented and reported to Managing Director

Agent has right to respond and appeal before final termination decision.

All agent compliance issues and actions taken documented in **Agent Compliance Log**.

## **Terminating Agent Relationships**

Agent agreements may be terminated by either party with notice period (as specified in agreement).

Termination process:

- Written notice provided
- Outstanding commissions settled
- Agent materials and access credentials returned/revoked
- Students currently recruited by agent supported through to completion
- Agent removed from active register
- Final file documentation completed

Reasons for ELI Schools-initiated termination:

- Breach of ethical standards
- Poor performance
- Non-compliance with agreement
- Financial issues
- Strategic decision (e.g., exiting market)

## **Part C: Direct Recruitment Activities**

### **Website Management**

Marketing Manager responsible for ELI Schools website content accuracy.

#### **Quarterly Website Audit:**

- Review all pages for accuracy
- Check all programme information current
- Verify fees and dates correct
- Test all links working
- Check testimonials still valid and consented
- Review images appropriate and current
- Verify accreditation logos/statements current
- Updates made immediately when errors found.

#### **Major Website Changes:**

- Follow approval process (Step 2)
- User testing before launch
- Accessibility check (compliance with web accessibility standards)
- GDPR compliance check

#### **Website Metrics:**

- Monitor website analytics
- Track inquiries from website
- Identify popular content and user journey
- Use data to improve user experience

## Digital Marketing Campaigns

When planning digital marketing campaign (social media ads, Google ads, email campaign):

### Planning:

- Define campaign objectives and target audience
- Develop messaging aligned with ethical principles
- Create ad copy and visuals
- Obtain approval (Marketing Manager minimum)

### Launch:

- Set up campaigns on platforms
- Ensure tracking and analytics configured
- Monitor performance daily initially

### Monitoring:

- Review ad performance (reach, engagement, conversions)
- Monitor for any negative feedback or complaints
- Adjust campaigns based on performance
- Respond to inquiries generated promptly

### Compliance Checks:

- Ads comply with platform policies (Facebook/Instagram/Google ad policies)
- ASA codes followed
- No misleading claims
- Clear identification of ELI Schools
- Appropriate disclaimers

## Sales Team Activities

Sales Managers ensure sales team operates ethically:

### Training:

All sales staff trained on:

- ELI Schools programmes (detailed knowledge)
- Fees, terms, refund policy
- Ethical recruitment principles
- Prohibited sales tactics
- Communication standards
- CRM system use
- Training refreshed quarterly

### Daily Practice:

- Respond to inquiries within 24-48 hours
- Provide accurate information
- Answer questions fully and honestly
- Follow up appropriately (not excessively)
- Record all communications in CRM
- Escalate complex questions to appropriate staff

### Sales Targets:

- Targets set based on quality enrolments, not just volume
- No pressure to enrol unsuitable students
- Commission structures don't incentivize unethical behaviour

**Monitoring Sales****Conduct:**

Sales Managers monitor through:

- CRM review (sample communications checked for appropriateness)
- Listening to recorded calls (if applicable)
- Mystery shopping (test inquiries)
- Student feedback (collected at induction)
- Complaint investigation

**Addressing Sales Team****Issues:**

If sales staff member uses unethical tactics:

- Immediate intervention by Sales Manager
- Discussion with staff member
- Retraining if needed
- Formal warning if serious or repeated
- Disciplinary action up to dismissal for serious breaches

**Handling Inquiries**

Standard process for all inquiries (web, email, phone, social media):

**Response:**

- Acknowledge inquiry within 24 hours
- Provide requested information accurately
- Offer additional relevant information
- Invite further questions
- Provide clear next steps (application process)
- Record inquiry in CRM

**Information Provided:**

- Programme details
- Fees and what's included
- Accommodation options and costs
- Visa requirements (general information)
- Application process
- Links to website resources
- Contact details for follow-up

**Professional Standards:**

- Friendly but professional tone
- Accurate English (proofread before sending)
- Personalized response (not just template)
- Respectful of student's time and questions

Complex inquiries escalated to appropriate staff (Academic Coordinator for programme queries, Admissions for visa queries, etc.).

## Managing Applications

When prospective student applies:

- Application Review:**
- Check application complete
  - Verify documentation provided
  - Assess student suitability for programme
  - Check visa requirements met (if applicable)
  - Review payment status

- Communication with Applicant:**
- Confirm application received
  - Request any missing information
  - Provide timeline for decision
  - Issue offer letter once approved
  - Provide pre-arrival information package

- Accuracy in Offers:** Offer letter states:
- Programme details (exactly what student will study)
  - Dates (start and end)
  - Fees (itemized, total)
  - Payment terms
  - Accommodation (if included)
  - Conditions (visa approval, payment, etc.)
  - Terms and conditions attached
  - Refund policy clear
  - No ambiguity or small print that contradicts main content

## 14. Complaints About Marketing or Recruitment

If student or parent complains about receiving inaccurate information or unethical recruitment:

- Investigation:**
- Sales Manager receives complaint
  - Gathers details from complainant
  - Reviews marketing materials or agent communications involved
  - Interviews staff or contacts agent
  - Determines if breach occurred

- Resolution:** If complaint valid:
- Apologize to student/parent
  - Correct any misinformation
  - Address underlying issue (withdraw inaccurate material, retrain staff, warn agent)
  - Consider if remedy owed to student (e.g., fee adjustment if fundamentally misled)
  - Document and report to Managing Director

If complaint not upheld:

- Explain findings to complainant
  - Document investigation
- Learning:**
- All complaints analysed for patterns
  - Root causes identified
  - Process improvements implemented
  - Staff training updated

## 15. Annual Compliance Review

Marketing Manager conducts comprehensive annual review:

- Marketing Materials Audit:**
- Review all current marketing materials for accuracy and compliance
  - Check website fully audited
  - Review agent materials current
  - Verify testimonials still valid and consented

Sales Manager conducts comprehensive annual review:

**Agent Portfolio Review:**

- Review all agent relationships
- Assess overall agent performance
- Identify any compliance concerns
- Plan agent recruitment or termination for coming year

**Sales Practices Review:**

- Review sample of sales communications
- Assess adherence to ethical standards
- Identify training needs
- Review any complaints or issues

**Regulatory Compliance Check:**

- Verify compliance with London Statement principles
- Verify compliance with Code of Practice marketing requirements
- Check GDPR compliance
- Review any changes to regulations

**Metrics and KPIs:**

- Inquiry volumes by channel
- Conversion rates
- Student satisfaction with recruitment process
- Agent performance statistics
- Complaints/issues tracked

## Part E: Staff Training and Development

### Training All Marketing and Recruitment Staff

<b>Induction Training (New Staff):</b>	<p>All new marketing, sales, and admissions staff receive:</p> <ul style="list-style-type: none"> <li>• Overview of ELI Schools' ethical commitment</li> <li>• Detailed training on Policy on Marketing and Ethical Student Recruitment</li> <li>• London Statement principles</li> <li>• Code of Practice requirements</li> <li>• Accurate information about all programmes, fees, services</li> <li>• Role-specific procedures</li> <li>• Case studies and scenarios</li> <li>• Assessment of understanding</li> <li>• Duration: Half-day minimum</li> </ul>
<b>Annual Refresher Training (All Staff):</b>	<p>All marketing and recruitment staff receive annual refresher:</p> <ul style="list-style-type: none"> <li>• Review of ethical principles</li> <li>• Updates on policies or regulations</li> <li>• Review of any issues from past year and lessons learned</li> <li>• Updated programme and fee information</li> <li>• Q&amp;A and discussion</li> <li>• Scenarios and role-play</li> <li>• Duration: 2-3 hours</li> </ul>
<b>Ongoing Development:</b>	<ul style="list-style-type: none"> <li>• Regular team meetings include ethics discussions</li> <li>• Case studies shared and discussed</li> <li>• External training opportunities supported (e.g., London Statement workshops)</li> <li>• Industry best practice shared</li> </ul>
<b>Performance Management</b>	<p>Marketing and recruitment staff performance reviews include:</p> <ul style="list-style-type: none"> <li>• Assessment of adherence to ethical standards</li> <li>• Review of student feedback</li> <li>• Review of any complaints or issues</li> <li>• Quality of communications</li> <li>• Accuracy of information provided</li> <li>• Professional conduct</li> </ul>

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<b>Approved by</b>	Board of Directors

#### Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- The London Statement: Ethical Principles for International Student Recruitment
- Advertising Standards Authority (ASA) Codes
- Data Protection Act 2018 and GDPR

## 15.3 Policy on Partnerships with Service Providers

<b>QA Area(s)</b>	• Public Information and Communication • Programmes of Education and Training • Learner Recruitment and Admission
<b>Applies to</b>	<input checked="" type="checkbox"/> Staff only <input type="checkbox"/> Learners only <input checked="" type="checkbox"/> Staff and learners
<b>Policy Owner</b>	Marketing Manager

### Purpose And Scope

This policy establishes guidelines for ELI Schools' partnerships with external service providers who deliver presentations, workshops, and direct services to our students. This policy supplements ELI Schools' Marketing and Student Recruitment Policy and applies to partnerships that extend beyond traditional student recruitment agent relationships.

From time to time, ELI Schools invites various service providers to engage with our student community to enhance their educational experience, career prospects, and overall welfare during their time in Ireland. These partnerships are established to support student development, provide access to valuable resources and opportunities, and ensure students receive comprehensive support services.

### Types of Service Providers covered by this policy include:

- Employment agencies and recruitment consultants
- Employers offering work placement or employment opportunities
- University pathway providers
- Higher education institutions and further education providers
- Other education institutions offering complementary programs
- External accommodation providers
- Career counselling and professional development services
- Financial services providers (banking, insurance)
- Other service providers offering legitimate services beneficial to students

### Services Provided may include:

- Informational presentations and seminars
- Workshops and training sessions
- One-to-one consultations and advisory services
- Direct service provision (accommodation placement, employment matching, etc.)
- Educational pathway counselling
- Career guidance and job search support

This policy ensures that all such partnerships are conducted transparently, ethically, and in the best interests of ELI Schools students, while maintaining compliance with Quality and Qualifications Ireland (QQI) requirements and relevant Irish and EU regulations.

## Declaration Of Independence

ELI Schools hereby declares that it maintains complete independence from all service provider partners covered by this policy.

### Specifically, ELI Schools declares that:

- ELI Schools has **no ownership interest**, either direct or indirect, in any partner organization providing services to students under this policy
- ELI Schools has **no financial interest** in any partner organization, including but not limited to shareholdings, profit-sharing arrangements, commission structures, or referral fees (except where ELI Schools receives payment for services rendered by ELI Schools to the partner)
- No member of ELI Schools' management, staff, or board of directors holds ownership or financial interests in partner organizations
- All partnerships are established solely on the basis of the value, quality, and appropriateness of services they provide to ELI Schools students
- ELI Schools does not receive financial compensation, commissions, or other material benefits from partners in exchange for student referrals or access to students
- Where ELI Schools charges partners for access to facilities or promotional opportunities (such as presentation space or inclusion in student communications), such fees are transparently disclosed and are based on fair market rates

This declaration is made for the purposes of QQI compliance, transparency to students and stakeholders, and to ensure that all partnerships are established in the best interests of students rather than for commercial gain.

Any exceptions to this declaration must be disclosed in writing to QQI and communicated clearly to students before any engagement with the relevant service provider.

## Due Diligence Process

Before engaging any service provider to deliver services to ELI Schools students, a comprehensive due diligence process must be completed to ensure the provider operates ethically, professionally, and in compliance with all relevant regulations.

## Initial Vetting Procedures

All prospective service providers must undergo initial vetting before being approved to engage with students. The vetting process includes:

### Documentation Requirements:

- Proof of business registration and legal status in Ireland or country of operation
- Evidence of relevant professional credentials, accreditations, or memberships
- At least two professional references from comparable institutions or clients
- Company profile including history, services offered, and target clientele
- Confirmation of compliance with GDPR and Irish data protection legislation
- Criminal background check for individuals who will have direct contact with students (where applicable and legally permissible)

## Assessment Criteria:

The Marketing and Student Services departments will assess each prospective partner against the following criteria:

- **Legitimacy:** Verification that the organization is legally registered and operating in good standing
- **Reputation:** Review of online presence, reviews, and feedback from other institutions or clients
- **Ethical Standards:** Assessment of the provider's business practices, complaints history, and adherence to professional codes of conduct
- **Relevance:** Evaluation of whether the services offered are appropriate and beneficial to ELI Schools' student demographic
- **Track Record:** Review of the provider's history, experience, and success in delivering similar services
- **Compliance:** Verification that the provider complies with all relevant Irish and EU regulations, including employment law, consumer protection, data protection, and industry-specific regulations

## Approval Process

Following completion of due diligence:

1. The Marketing Manager or Student Services Manager prepares a recommendation report
2. The report is reviewed by the Academic Director or School Director
3. Final approval is granted in writing before any engagement with students
4. Approved partners are added to the Service Provider Register
5. A partnership agreement or memorandum of understanding is executed outlining expectations, responsibilities, and terms of engagement

## Monitoring And Oversight

ELI Schools maintains ongoing monitoring and oversight of all service provider partnerships to ensure continued compliance with ethical standards and quality expectations.

## Monitoring Activities

### Regular Monitoring includes:

- Documentation of all partnership activities, including dates, types of services provided, and number of students engaged
- Observation of presentations and workshops (where feasible)
- Review of materials distributed to students
- Collection and analysis of student feedback (see Section 5)
- Review of any complaints received (see Section 6)
- Annual review of partnership performance and value to students

## Performance Standards

All service providers are expected to meet the following performance standards:

- Provide accurate, honest, and transparent information to students
- Deliver services professionally and in accordance with agreed terms
- Respect student privacy and handle personal data in compliance with GDPR
- Respond promptly to student inquiries and concerns
- Maintain appropriate professional boundaries with students
- Comply with all relevant Irish and EU regulations
- Cooperate with ELI Schools' monitoring and feedback processes

## Frequency of Monitoring

- **Active partnerships** (providers engaging with students at least quarterly): Reviewed quarterly
- **Occasional partnerships** (providers engaging with students less than quarterly): Reviewed annually
- **All partnerships:** Comprehensive annual review

The Marketing Manager or Student Services Manager is responsible for coordinating monitoring activities and maintaining documentation.

## Student Feedback System

ELI Schools operates a systematic feedback collection process to assess student satisfaction with service provider partnerships and to identify any concerns or areas for improvement.

## Feedback Collection Mechanisms

### Feedback is collected through:

- **Post-event surveys:** Distributed immediately following presentations, workshops, or events
- **Service-specific feedback forms:** Provided to students who engage directly with service providers (e.g., accommodation placement, employment services)
- **Periodic general surveys:** Included in broader student satisfaction surveys conducted each term
- **Focus groups:** Conducted with student representatives to gather qualitative feedback
- **One-to-one interviews:** With students who have extensively used partner services

## Timing and Frequency

- Post-event surveys are distributed within 24-48 hours of the event
- Service-specific feedback is requested 2-4 weeks after service delivery
- General surveys are conducted at mid-term and end-of-term
- Focus groups are held at least once per academic term

## Feedback Analysis and Use

The Student Services department is responsible for:

- Collecting and compiling all feedback data
- Analysing feedback to identify trends, concerns, and areas of excellence
- Preparing quarterly feedback reports for review by management
- Sharing relevant feedback with service providers (anonymized to protect student privacy)
- Using feedback to inform decisions about continuation, modification, or termination of partnerships
- Identifying opportunities for improvement in how partnerships are managed

## Communication of Findings

- Service providers receive summary feedback reports on a quarterly basis
- Positive feedback is acknowledged and providers are encouraged to maintain high standards
- Concerns or negative feedback are communicated promptly with expectations for corrective action
- Persistent negative feedback may result in suspension or termination of the partnership

## Student Complaint Procedure

ELI Schools provides a clear, accessible procedure for students to lodge complaints about service providers. All complaints are taken seriously and investigated promptly.

### How to Lodge a Complaint

Students may lodge complaints about service providers through multiple channels:

- **Email:** [complaints@elischools.ie](mailto:complaints@elischools.ie) (or designated complaints email)
- **In-person:** To any member of the Student Services team, Academic staff, or Management
- **Online form:** Available on the ELI Schools student portal or website
- **Written complaint:** Submitted to the Student Services office
- **Anonymous reporting:** Through the online form or suggestion box

### Confidentiality

- All complaints are treated confidentially
- Student identities are protected and not disclosed to service providers without explicit consent
- Where investigation requires disclosure, students are informed in advance and their consent is obtained
- Anonymous complaints are investigated to the extent possible without identifying the complainant

### Investigation Process

Upon receipt of a complaint:

1. **Acknowledgment:** The complaint is acknowledged within 2 working days
2. **Initial Assessment:** The Student Services Manager or designated staff member assesses the nature and severity of the complaint
3. **Investigation:** Relevant information is gathered, which may include:
  - Interview with the complainant (if not anonymous)
  - Review of documentation and records
  - Contact with the service provider for their response
  - Interviews with witnesses or other affected students
4. **Findings:** A determination is made regarding whether the complaint is upheld, partially upheld, or not upheld
5. **Communication:** The outcome is communicated to the student within 15 working days of receipt of the complaint (or as soon as reasonably possible for complex cases)

### Timeframes

- **Acknowledgment:** Within 2 working days
- **Resolution of straightforward complaints:** Within 10 working days
- **Resolution of complex complaints:** Within 15 working days
- **Extensions:** If additional time is required, the student is informed of the reason and expected timeline

### Actions and Remedies

If a complaint is upheld, ELI Schools may take the following actions:

- **Warning:** Formal written warning to the service provider with expectations for corrective action
- **Remedial action:** Requirement for the provider to take specific corrective measures
- **Suspension:** Temporary suspension of the partnership pending corrective action
- **Termination:** Immediate termination of the partnership for serious breaches

- **Referral:** Referral to relevant regulatory authorities or professional bodies if malpractice or illegal activity is identified
- **Student support:** Provision of support to affected students, which may include assistance in finding alternative services

### **Appeals**

Students who are dissatisfied with the outcome of their complaint may appeal to the School Director within 10 working days of receiving the outcome. The appeal will be reviewed by a senior staff member not previously involved in the case, and a final decision will be issued within 10 working days.

### **Ethical Standards**

All service providers engaging with ELI Schools students must adhere to the highest ethical standards.

#### **Service providers must:**

- Operate with honesty, integrity, and transparency in all dealings with students
- Provide accurate information and not engage in misleading or deceptive practices
- Respect student autonomy and not pressure students into decisions
- Maintain professional boundaries and not exploit students' vulnerability or lack of familiarity with Irish systems
- Protect student privacy and handle personal data in strict compliance with GDPR and Irish data protection law
- Not engage in any form of discrimination based on nationality, race, religion, gender, sexual orientation, disability, or any other protected characteristic
- Comply with all relevant Irish and EU regulations, including but not limited to employment law, consumer protection law, accommodation standards, and education regulations
- Not engage in any fraudulent, illegal, or unethical activities
- Declare any conflicts of interest that may affect their service delivery
- Cooperate fully with ELI Schools' monitoring, feedback, and complaint processes

#### **Prohibited Activities:**

Service providers must not:

- Make false or exaggerated claims about their services
- Charge excessive or hidden fees
- Engage in aggressive or coercive sales tactics
- Collect student data for purposes other than service delivery without explicit consent
- Share student data with third parties without authorization
- Offer inducements or incentives to ELI Schools staff in exchange for student referrals

Breach of these ethical standards may result in immediate termination of the partnership and referral to relevant authorities.

### **Record Keeping**

Comprehensive records are maintained for all service provider partnerships to ensure transparency, accountability, and compliance with QQI requirements.

### **Documentation Requirements**

The following records are maintained for each service provider partnership:

- Partnership agreement or memorandum of understanding
- Due diligence documentation (business registration, insurance, references, credentials)

- Record of all activities and student engagements
- Student feedback data and analysis
- Complaints received and outcomes
- Correspondence with the service provider
- Monitoring reports and performance reviews
- Any incidents or issues and how they were resolved

### Retention Period

All records are retained for a minimum of **six years** following the conclusion of the partnership, or as required by QQI or other regulatory requirements, whichever is longer.

### Access and Audit

Records are maintained in a secure, organized manner and are accessible for:

- Internal review and quality assurance purposes
- QQI audits and inspections
- Investigation of complaints or incidents
- Legal or regulatory inquiries

The Marketing Manager and Student Services Manager are jointly responsible for maintaining the Service Provider Register and associated documentation.

### Policy Review

This policy will be reviewed annually or as required by changes to QQI requirements, Irish or EU regulations, or ELI Schools' operational needs.

Reviews will consider:

- Effectiveness of due diligence and monitoring processes
- Student feedback and complaint trends
- Changes in regulatory requirements
- Best practices in the education sector
- Incidents or issues that have arisen

Amendments to this policy must be approved by the School Director and communicated to all relevant staff and, where appropriate, to students and service providers.

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<b>Approved by</b>	Board of Directors

### Related legislation, regulation or guidelines:

- Code of Practice for Provision of Programmes of English Language Education to International Learners
- The London Statement: Ethical Principles for International Student Recruitment
- Advertising Standards Authority (ASA) Codes
- Data Protection Act 2018 and GDPR