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## Monitoring of education agents engaged in international student recruitment: perspectives from the agency theory

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### Abstract

This paper examines the monitoring of third party education agents employed in international student recruitment. Agency theory identifies comprehensive monitoring as one way to ensure that agents work in the principal's best interest. By analysing best practice guidelines, this paper investigates the monitoring mechanisms proposed for education providers to mitigate information asymmetry in their education agent relationships. The findings from the analysis suggest that following the existing guidelines would only allow client institutions to partially observe the behaviour of their agents. Hence, education providers should be not only guided towards more intensive use of the existing techniques but also encouraged to adopt new techniques, such as mystery shopping, to better determine education agents' true behaviour.

### Keywords

Education agents, monitoring, control mechanisms, international education, international student recruitment, agency theory

### 1 Introduction

The use of third-party education agents in international student recruitment is a widely used market entry strategy (Coffey & Perry, 2013; Havergal, 2015; Huang, Raimo, & Humfrey, 2016; Independent Commission Against Corruption {ICAC}, 2015; Observatory of Borderless Higher Education {OBHE}, 2014). Education agents are perceived as a type of 'indirect exporting', representing a 'low equity - low control' export option (Brouthers & Hennart, 2007; Goi, 2015; Li & Roberts, 2012). Conformingly, the reasons for contracting education agents are often based on the desire to increase market presence without a high level of upfront investment, whilst many of the pertinent risks are linked to the limited abilities of education providers' to control the behaviour of their agents (Coco, 2015; Coffey & Perry, 2013; Galbraith & Brabner, 2013; ICAC, 2015; Queensland Government, 2009; Raimo, Humfrey, & Huang, 2015). Examples of the issues frequently reported in the literature are situations breaching the interests of the students, such as misleading information and financial fraud; situations breaching the

interest of the education providers, such as manipulation of the application process or limited effectiveness (Table 1), as well as situations breaching the wider national interests (c.f. Nikula & Kivistö 2017).

The popularity of education agents as a foreign entry market strategy and the above mentioned pertinent risks highlight education providers' responsibility to overcome these low control conditions. The agency theory suggests that one of the essential factors in efficient third-party control is the ability of the principal to monitor the behaviour of the agent (Kiser, 1999; Kivistö, 2008). The extant literature on education agent management is scarce in understanding the monitoring abilities of education providers, and mainly reports on the used monitoring techniques and discusses other control tools (Coco, 2015; Coffey & Perry, 2013; Huang et al., 2016; O'Connell, 2012; Raimo et al., 2015). To address this gap, this paper examines the set of monitoring tools proposed for this industry and investigates the extent to which these tools, independently and interdependently, allow education providers to ascertain the common issues identified in this industry.

This paper is structured as follows. The next section will analyse the role of monitoring in education provider–agent relationships from the perspective of the agency theory. The third section will introduce the research design, which will be followed by discussion and critical analysis of the results.

## 2 Agency Theory: perspectives on education agents

Nikula and Kivistö (2017) have suggested that agency theory (Jensen & Meckling, 1976; Ross, 1973) provides a useful framework for analysing the relationship between education providers and their contracted education agents. Agency theory investigates relationships between two parties where one party (the principal) engages the other (the agent) to perform tasks on their behalf. The key assumption is that after delegation of authority, a principal is likely to encounter problems in controlling the agent behaviour. The logic behind this assumption is that the agent's interests and goals are likely to differ from those of the principal and that agents often have better information than the principals about their actions related to the assigned tasks (information asymmetry) (e.g. Eisenhardt, 1989; Kivistö, 2008).

The assumptions outlined above are present in the education provider–agent relationships<sup>1</sup>. The interests of education providers and agents are only partially aligned as the profit-oriented nature of the agent's operation does not align directly with the goals of client institutions, especially in relation to student quality (Nikula & Kivistö, 2017). At the same time, conditions such as geographic distance and language barriers accentuate information asymmetries across industries, making monitoring difficult (Dant & Nasr, 1998; Filatotchev & Wright, 2011; Fladmoe-Lindquist & Jacque, 1995; Kim, Prescott, & Kim, 2005; Roth & O'Donnell, 1996; Yi, Teng, & Meng, 2018). The non-repetitive nature of end-customers (i.e. students) is also likely to increase agency hazards in this industry (Gómez, González, & Suárez, 2011).

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<sup>1</sup> This paper will focus on 'institution-contracted, for-profit actors assisting in recruiting international students in exchange for compensation paid by the institution(s)' (Nikula & Kivistö, 2017, p. 5). The monitoring of these formal relationships can be considered as education providers' first priority. However, the insights from this paper should be largely useful for monitoring other type of agents (Altbach & Reisberg, 2013; Coffey & Perry, 2013; Ministry of Education, 2015a; Nikula & Kivistö, 2017; Roy, 2017).

The principal has two options for mitigating the moral hazard problem resulting from conflicts of interests and information asymmetries: increasing agent monitoring efforts and/or offering incentives that are as compatible as possible with the goals of the principal. A limited body of academic literature has investigated education providers' perspectives on different incentives and/or contracts in education agent management (e.g. Coco, 2015; Huang et al., 2016; O'Connell, 2012), but there are few, if any, studies elaborating the effectiveness of different monitoring techniques and monitoring caveats in this industry.

The insufficiency of the standard financial incentives (e.g. ICAC, 2015) and the limited power of contracts (Huang et al., 2016; O'Connell, 2012) in controlling education agents, emphasises the need to better understand the role of monitoring in education provider-agent relationships. Furthermore, there appears to be major gaps in many education providers' extant monitoring practices. Some providers argue that it is impossible to monitor the activities of their education agents or admit that they have not established systematic monitoring frameworks (Australian Government, 2010; Coffey & Perry, 2013; Huang et al., 2016; Ministry of Education, 2015a, 2015b). Others have been found to be unaware of how their agents actually behave (Coco, 2015; Coffey & Perry, 2013; Galbraith & Brabner, 2013; Matthews, 2012). For instance, in 2012 a questionnaire sent to UK universities revealed that 70% of the respondents had limited understanding of whether their agents charged fees from recruited students, and 80 % of respondents did not know whether the agents communicated the exact nature of the representation to the students (Matthews, 2012).

The objective of this study is to investigate the range of monitoring methods proposed for education providers vis-a-vis the insights derived from agency theory and other literature discussing third party monitoring techniques and critically evaluate whether the monitoring methods allow education providers to observe the key problems identified in education agent behaviour to address the pervasive information asymmetries. The next section will discuss the research design.

### 3 Research Design

To evaluate how education providers are advised to observe the true behaviour of their agents, this paper was set to review available industry-specific best practice guidelines published within the past decade (January 2008 – March 2018) from the UK, Australia, the United States, New Zealand, and Canada. These countries are key users of education agents and together host more than half of all international student tertiary level enrolments in OECD countries (OECD, 2014, 2017).

The search for documented guidelines began with a review of government and major industry body websites. Internet searches (with keywords such as 'education/recruiting agent' and 'best practice', 'management' or 'monitoring') and the snowballing technique (scanning of references of retrieved documents) were extensively used and select organisations were contacted to enquire about the existence of additional guidelines. Documents that did not propose sufficient examples of monitoring techniques were excluded. The final best practice guideline dataset consisted of eight documents published by government agencies or well-known industry bodies (Table 2). An additional five documents reporting on providers' existing control practices were included in the dataset. These second layer documents included two doctoral dissertations and three reports that were produced, commissioned or funded by government agencies. The second layer was included to provide a sample of

actual monitoring techniques from the case countries. Therefore, it does not aim being representative of all providers' practises nor a comprehensive list of available documents reporting on extant practices.

The documents were analysed through qualitative content analysis (Elo & Kyngäs, 2008; Schreier, 2012). A monitoring tool analysis grid was based on a review of the agency theory and market entry mode literature identifying different monitoring techniques used by principals to detect deviation in agent behaviour (Bradach, 1997; Cassou, Cliquet, & Perrigot, 2017; Combs, Michael, & Castrogiovanni, 2004; Dant & Nasr, 1998; Fladmoe-Lindquist & Jacque, 1995; Gómez et al., 2011; Kidwell & Nygaard, 2011; Kidwell, Nygaard, & Silkoset, 2007; Roth & O'Donnell, 1996). Next, deductive pattern matching was performed: all the documents were read multiple times and relevant examples from the documents were recorded in the matching categories (Elo & Kyngäs, 2008). All document sections discussing agent selection (due diligence before contracting) were excluded as this study focused only on the monitoring of existing relationships (moral hazard), and not on adverse selection agency problems. An 'other' category was created to include a more inductive way of recording the data. Because of its frequent use, an additional 'peer sharing' category was created to capture situations where monitoring was based on communication with other principals using the same agent.

Even though a comprehensive review of available guidelines was undertaken, some relevant documents may not have been identified. Further, best practices may be shared via non-published fora excluded from the data, such as conference presentations, consultations, and workshops. However, overall the limited number of documents identified is believed to reflect the scarce literature and data available about the education provider-agent relationship (Huang et al., 2016; PhillipsKPA, 2005; Reisberg & Altbach, 2011) and the 'limited documentation freely available to education providers to assist them in managing risks associated with Education Agent management' (VTI, 2010, p. 4).

Another limitation of this study is that narrowing the scope of data collection to documents published in select English-speaking countries presents only a partial picture of the best practice guidelines. The use of education agents has now become a global phenomenon, and client institutions can be found in many non-English speaking countries (c.f. Nikula & Kivistö, 2017; OBHE, 2014). Hence, the findings may have limited external validity outside the case countries, and further research should include similar guides from elsewhere. Nevertheless, the findings from this study do offer important insights as the selected group of countries is responsible for a significant share of the total global international enrolments.

#### 4 Evaluation of the monitoring tools proposed in the best practice guidelines

The importance of monitoring education agents' behaviour is outlined in all the best practice guides, prompting education providers to maintain an 'ongoing process to monitor' (NZQA, 2016, p. 8) or to commit to 'regularly monitoring and assessing the agencies' (West & Addington, 2014, p. 16). According to the Australian Government (2009), monitoring is important to '...ensure that the education agent's knowledge about your institution and courses is current; identify areas where the agents' knowledge requires updating/ amendment; and detect any inappropriate practices' (p. 7). The specific monitoring techniques proposed across all the documents are listed in Table 3. The content analysis shows that the most common monitoring mix in the best practice guidelines consists of customer feedback, field audits and data analysis. Other strategies, such as marketing material audits, peer sharing and mystery shopping, are rarely, if at all, mentioned.

First, all the guidelines mention application and student data analysis, including at least basic examples as of what to monitor, such as the number of applications and students recruited. Also, the ability to recruit for a diverse number of academic programmes is proposed (VTI, 2010, p. 17). Most guidelines go beyond nominal quantities and propose conversion percentages for assessing the quality of applications as well as the quality and suitability of the recruited students. For instance, AIRC (2016) document outlines that client institutions should 'measure the successes of agency recruited students, including persistence rates (retention), academic success (GPA; graduation rate), and personal success (engagement, leadership)' (2016, p. 18). In line with this advice in the guidelines, the second layer documents report the use of diverse metrics, such as the number of applications, conversions, visa refusal rates and the quality of students (e.g. graduation/ persistence rates).

These data allow providers to draw a fairly comprehensive picture of agent effectiveness and identify certain issues of mis/disinformation, for instance by examining transferral and success rates. However, in most guidelines a more systematic description of the metrics, including the exact aspects/s of agent behaviour they help monitor would be warranted. Similarly, the guidelines could more explicitly describe best practices in benchmarking, such as regional agent-to-agent comparisons (e.g. VTI, 2010) or the success of agent-recruited students versus non-agent recruited students over-time (AIRC, 2016; West & Addington, 2014) to identify underperformance.

Second, field-audits as a monitoring tool are mentioned in all the guidelines. The objectives of these visits range from vague descriptions, such as obtaining 'a first-hand understanding of how they operate' (NZQA, n.d., p. "managing risks" section), to specific ideas such as ensuring that 'up-to-date information is displayed by Agent' (VTI, 2010, p. 21), or 'determining the agents' level of knowledge of your courses and campuses' (Australian Government, 2009, p. 5). Field audits are also reported as a frequently used strategy by education providers in the second layer of documents.

Field audits may be useful in identifying situations of misinformation or in determining the suitability of the premises and/or friendliness of the service (c.f. Coco, 2015). However, language and cultural differences can impede an institutional representative's ability to observe whether what is being told to the student is correct or not (Galbraith & Brabner, 2013, p. 9), or whether the service can be considered 'friendly' or 'appropriate' in the given cultural context. Neither are field audits a reliable tool for identifying situations of intentional misleading/sharing of unfavourable information as the agent's normal behaviour may differ from what is demonstrated during the inspection. Further, one of the Australian reports specified that many staff who visit agents might 'do so under the pretence of inspecting operations but mainly aim to maintain and strengthen the relationship to ensure the agent continues to direct students to the university' (ICAC, 2015, p. 20). Hence, this form of monitoring appears highly dependent on the objectives and competencies of the person conducting the visit. Ideally, all the best practice guides should clearly elaborate the potential monitoring aspects of these visits (e.g. systematic guidelines) and the competencies required for becoming a field auditor.

Third, regular contact is frequently mentioned in the guidelines. However, this contact is predominantly framed as a best practice tool in training or measuring agent engagement (VTI, 2010). For instance, the NACAC (2014) guide outlines that it 'is important to commit to regular and frequent communication with agency partners throughout the duration of a contractual relationship. One can mitigate the risk of misrepresentation by being proactive and responsive via email or phone' (p. 15). Here, communication is presented as a risk-avoidance strategy, rather than as a tool to identify unwanted behaviour. The second layer of documents similarly discuss regular contact as a tool to sustain the overall relationship and less as a systematic monitoring measure.

However, talking to agents can be an efficient tool to test agents' knowledge of study opportunities and other destination country-related arrangements (e.g. VTI, 2010). That said, for the same reasons as identified in the field audit section, regular contact appears mainly useful for monitoring misinformation or limited engagement, rather than disinformation or other type of misconduct. In many of the guides, regular communication is described as a one-directional process (i.e. an opportunity for the client to distribute information to the agent). For example, the Australian Government (2009) guide encourages regular contact with agents 'so that they are promptly informed of any changes to your institution's arrangements' (p. 4). However, to serve as an efficient monitoring tool, the guidelines should define constant contact as a two-directional process, where the likelihood of misinformation is evaluated by questioning the agents and identifying gaps in their knowledge.

Fourth, student feedback is specified in all the guidelines as a monitoring tool. Student feedback is mentioned in all its forms, such as self-reported complaints, focus groups, informal/formal interviews and surveys. The guidelines propose that student feedback should be actively collected, and education providers should not wait for self-reporting of complaints by the students. For instance, the Australian Government (2009b) report outlines that institutions can 'survey students on commencement regarding the accuracy, usefulness and comprehensiveness of the information received from education agents' (p. 5) and according to Scoby (2017) 'student's satisfaction level is a good indicator of whether or not the agent represented and promoted the institution accurately' (p. 197). Fewer guides emphasise the need to gather feedback from other stakeholders, such as parents (NZQA, 2016; Queensland Government, 2009). Customer feedback is also frequently cited category in the second layer of documents, indicating a similar range of sub-tools and objectives for collecting student feedback. However, some providers seem to rely only on self-reported complaints, rather than actively surveying students.

Student feedback can potentially help identify problems with agents' knowledge, transparency, the quality of service (e.g. friendliness), financial conduct (e.g. any fees charged) and subcontracting arrangements (c.f. Australian Government, 2009b; Coco, 2015; VTI, 2010). However, the guidelines fail to mention that the reliability of this feedback may be compromised by various factors, such as language skills, recall bias and bounded rationality. Students or family members with limited English proficiency may not be able to fully understand the questions or communicate their experiences (Coco, 2015). Few guidelines suggest that surveys should be translated to collect information (NZQA, n.d.), and most do not address recall bias (i.e. feedback collected a fairly long time after the service has been provided) or bounded rationality, such as student limited ability to evaluate the responsibilities of the agents or the extent to which they have been misled/misinformed.

Coco (2015) argues that 'in many (and some would argue most) cases, students may have no idea that institutions and agencies are working together, and therefore may not fully understand the financial exchanges and the conflict of interest that can possibly occur' (p. 86.). Even if education providers clarify these expectations before the feedback is collected, many aspects may still be difficult for students to disclose – such as whether more suitable study destinations/providers were available elsewhere. A longitudinal approach (e.g. Coco, 2015) may mitigate this issue somewhat, such as surveying students later when they have a better understanding of the suitability of the institution. Also, most documents focus on surveying of enrolled students, only a few suggesting surveying of applicants (Di Maria, 2014; Raimo et al., 2015) which offer an important additional perspective. Likewise, institutions are given no advice on how to access non-customers (i.e. students who visited the agent but did not apply). These limitations and a clear explanation of the use of the sub-tools recommended (e.g. timing, language, tool) should be covered in the best practice guides.

Fifth, only half the guidelines and one of the second layer documents cite auditing of agent-produced marketing materials, such as agent brochures and websites<sup>2</sup>, as a monitoring tool. The VTI (2010) guide mentions the need to inspect whether the institution's unique identification number has been included in 'all written materials and those in electronic form' (p. 88). A further review of 15 education agents' websites, representing a majority of the well-known Australian research universities, revealed that only four of the agents have included this required CRICOS identification code on their websites.<sup>3</sup> This casts significant doubts on the actual marketing audit processes employed by many providers. A review of relevant marketing materials would allow education providers to assess how the agent portrays the client institutions and the accurateness of the information provided, e.g. description of the destination, fees and transparency. Hence, marketing audit should be increasingly emphasised as part of the monitoring mix with a clear explanation of its proper use and objectives.

Sixth, the peer review method is mentioned only once in the guidelines, in the form of 'a common process via a group of signatories who share the same agents' (NZQA, 2016, p. 8). Professional certifications of agents are mentioned in most guidelines as an agent selection criterion excluded from this study. However, it is good to note that some of these certifications provide information about the ongoing behaviour of agents (e.g. any complaints or deregistrations). Also, the second layer documents suggest that peer sharing is used, formally or informally, by many providers (Coco, 2015; Coffey & Perry, 2013; ICAC, 2015; O'Connell, 2012; Raimo et al., 2015). For instance, in the study by Coffey and Perry (2013), one of the respondents notes that 'increasingly, we do have these kinds of [conversations occurring] ... Canadian institutions have to work together and advise their peers when they've had a bad experience. I think that will increasingly have to happen' (p. 35).

Peer communication can be an efficient method to communicate a diversity of agent behaviour related issues across the sector. At best, it should be facilitated through reliable third parties, such as professional organisations or government agencies. For instance, the Australian and New Zealand governments have promoted this type of industry-wide sharing of agent performance (Crace, 2018; Department of Education and Training, 2017; Immigration New Zealand, n.d.) The limitation of this method though is its secondary nature; in other words, one of the principals will still need to identify these issues by using primary monitoring techniques. However, sharing appears a useful tool for identifying many types of issues in agent behaviour, and therefore, should be more clearly emphasised in all the guidelines as part of the monitoring mix.

Finally, mystery shopping is not listed as an approach in any of the best practice guidelines, though many studies indicate its suitability for identifying diverse issues when working with third parties (Dant & Nasr, 1998; Jacob et al., 2018; Utgård, Nygaard, & Dahlstrom, 2015). Also, its benefits compared to customer surveys have been outlined in research (e.g. Finn & Kayandé, 1999; Gómez et al., 2011). Only one of the second layer documents mentions mystery shopping, adding that only few respondents reported employing it (Raimo et al., 2015, p. 22). A further electronic search returned one conference paper proposing this tool for education providers (Pattingale, 2007) as well as its use by investigative journalists (Newell & Watt, 2012; The Telegraph, 2012). A well-designed mystery shopping framework,

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<sup>2</sup> Some of the guidelines covered this in their due diligence sections. To be included in the marketing audit category, a systematic content audit of agent-produced marketing materials was required.

<sup>3</sup> Australian legislation requires all marketing materials promoting courses to international students to include the provider's unique Commonwealth Register of Institutions and Courses for Overseas Students code (CRICOS). The education agents were identified from the website listings of Australian Group of Eight universities. The random sample included agents from South America, India, China, Europe, and South Africa.

i.e. hiring people posing as prospective students to sit through the student counselling and application processes, can allow client institutions to determine diverse types of agent behaviour, including fees charged, transparency, quality of service provision, mis/disinformation and aspects of internal processes (e.g. the speed of application processing). Moreover, as mystery shopping allows control over both the questions asked and the characteristics of the 'dummy' students, education providers can have the hitherto unavailable opportunity of monitoring the treatment of non-customers (i.e. the students deciding not to apply to the client institution). Given the monitoring gaps and limitations of student surveys, mystery shopping seems to be underutilised as a control approach.

## 5 Discussion: a way forward

The analysed best practice guides recommend monitoring techniques that allow for a sound overview of the quantity and quality of students recruited and a few other aspects of agent behaviour, such as misinformation and suitability of the office premises. However, there are significant drawbacks - even if all the recommended monitoring techniques were employed at once, some aspects of agent behaviour would remain hidden from the client institution (Table 4). This section discusses these key monitoring gaps and evaluates the extent to which deviation in agent behaviour can be identified in these situations.

The reviewed best practice documents provide limited advice on how to monitor agent misconduct that predominantly breaches the interests of client institutions, such as attempts at manipulating the application process, or unauthorised subcontracting. The available advice mainly focuses on pertinent ways to mitigate risks, such as proposing rules for communication, contracts and the application process. However, all client institutions should identify suitable procedures to determine this type of unwanted behaviour. Besides employing internal and external verification practices (c.f. ICAC, 2004; Patingale, 2007), the use of mystery shopping appears to be a necessary primary tool for identifying a range of issues, such as any manipulation of documents or disclosing unfavourable information. Further, the peer monitoring process can help in sharing knowledge of this type of misconduct across the sector. The best practice guidelines should strongly emphasise these strategies, allowing clients to learn from each other and strengthen their own monitoring practices to mitigate unwanted behaviour.

Similarly, the existing best practice guidelines fail to explain how education providers can efficiently monitor the agent's internal processes and the verbal information disclosed to students. More specifically, the information disclosed to non-customers, i.e. students visiting education agents but deciding not to apply to the client institution, has hitherto remained unmonitored. Again, the mystery shopping tool seems appropriate for a reliable observation of education agent behaviour in this context.

Gomez (2011) emphasises the limitations of mystery shopping by reminding that 'some operational procedures are not carried out in the presence of clients (e.g. the manipulation of inputs in the kitchen of a restaurant)' (p. 720). In the education agent context, internal procedures that are not easily observable by institutional clients or dummy customers are the treatment of documents and information collected (e.g. confidentiality of data), the training given to counsellors or the time used to address customer-related problems. The only way for education providers to access some of this internal agent-specific information might be to hire staff who have worked for education agencies – a method that is unlikely to lend itself to large-scale monitoring.



Education providers may not be easily able to enjoy the benefits of plural forms sometimes used in the franchising context (Bradach, 1997; Kidwell & Nygaard, 2010): yet, by running their own agencies in some of the key markets, client institutions would increase their ability to control their external agents. Kidwell and Nygaard (2010) argue that ‘...an organization that rests fully on contracts with external agents to represent its brand capital in the market distances itself from customers and thus gradually loses competence in how to contract its franchisees without knowledge of the business, technology, markets, consumer preferences etc.’ (p. 19).

These insights are equally applicable to education provider – agent relationships, and emphasise the importance of the internal competencies of the education provider. As these types of plural forms are unlikely to be feasible for most providers, then the competencies and time allocation of the staff members (e.g. their language skills and knowledge of the countries and a feasible number of agents per staff member) will play an important role in the effectiveness of any monitoring strategies.

The level of motivation for increasing monitoring activities to ensure more ethical behaviour is likely to differ considerably across education providers (Nikula & Kivistö, 2017). For instance, in Australia, the Independent Commission Against Corruption concluded that ‘unfortunately, a number of universities continue to accept applications from any agent, regardless of whether they have a formal contract with the university or appropriate training and/or expertise’ (ICAC, 2015, p. 23). Education providers will weigh the pros and cons of new monitoring techniques, such as the additional costs, and the trade-offs between financial gains and compliance requirements or other operational values.

## Conclusions

This article examined monitoring in education provider-education agent relationships under asymmetric information. The literature search revealed that few best practice guidelines discussing monitoring techniques in any detail are currently available. Comprehensive guidelines with practical advice should be developed as a priority by government agencies or other national level organisations in all countries where education providers contract agents.

The second concern is the content covered in the existing guidelines. Even though the guidelines emphasised the importance of monitoring, they failed to provide sufficient advice on how to (in-effect) achieve the monitoring objectives. In other words, the proposed monitoring practices were not deemed sufficient to capture the true nature of agent behaviour. This paper proposed mystery shopping as a new-to-the-industry technique to better detect agents’ true behaviour. Mystery shopping, as part of the overall monitoring mix, can be considered as a significant step forward in identifying some of the hitherto hidden aspects of agent behaviour. The effectiveness of the existing monitoring practices employed by some education providers was also questioned, and the urgent need for a more systematic approach was identified. A more comprehensive description of the use and limitations of the different tools should be included in all the best practice guidelines.

Nevertheless, even with the use of a comprehensive set of tools, some areas are likely to remain hidden from the client institutions. For instance, an understanding of many of the internal processes would require an insider perspective. Therefore, it may be unrealistic to assume that agents’ true behaviour can be fully detected. The effectiveness of other incentives, such as contracts and commissions, has been similarly challenged in the extant literature. If agent engagement is to be continued, the education providers (and pertinent regulative bodies) must accept that no monitoring tools can fully reveal agents’

true behaviour. However, through a systematic employment of the proposed monitoring tool mix, education providers can achieve a deeper understanding of their agent behaviour.

Further research should undertake a similar review of best practice guidelines in other countries and interview education providers and their agents on their perspectives of efficient monitoring and the related barriers. Moreover, a similar analysis of other dimensions of education agent management, such as selection, contracting, and training would further improve the understanding of best practices in this industry.

Table 1. Key issues to monitor in formal education provider –education agent relationships

Breaches the interests of	Identified problems	Examples of the identified problems
Students	<ul style="list-style-type: none"> <li>• Misinformation</li> <li>• Disinformation</li> <li>• Financial fraud/misconduct</li> <li>• Limited transparency</li> <li>• Other type of unprofessional service</li> </ul>	<ul style="list-style-type: none"> <li>• Accidental misleading/incomplete information</li> <li>• Intentional misleading</li> <li>• Double dipping without consent, stealing money</li> <li>• Not disclosing the terms of representation</li> <li>• Unfriendliness, pushiness, delays, limited confidentiality of information</li> </ul>
Client institutions	<ul style="list-style-type: none"> <li>• Unfavourable information</li> <li>• Limited effectiveness</li> <li>• Manipulating the application process</li> <li>• Other significant misconduct</li> </ul>	<ul style="list-style-type: none"> <li>• Negative information about the client institution</li> <li>• Low number of (quality) applications/students</li> <li>• Document fraud, writing personal statements</li> <li>• Sending invoices on wrong grounds, unauthorised sub-contracting, leaking sensitive information</li> </ul>

Sources: Altbach & Reisberg, 2013; Australian Government, 2010; Bridge Education Group, 2016; Coco, 2015; Coffey & Perry, 2013; Di Maria, 2014; Galbraith & Brabner, 2013; Guest & Gregory, 2017; Huang et al., 2016; ICAC, 2004, 2015; Marcus, 2013; Marsh, 2016; Newell & Watt, 2012; Pattingale, 2007; PhillipsKPA, 2005; Productivity Commission, 2015; Raimo et al., 2015; Reisberg & Altbach, 2011; Roy, 2017; Stecklow & Harney, 2016; Tamar, 2008; Tan, 2015; West & Addington, 2014

Misinformation includes any situation where wrong or incomplete information is accidentally given to students. This may occur because of lack of effort to acquire the right information, incomplete training or misunderstanding (c.f. Huang et al., 2016; ICAC, 2015; PhillipsKPA, 2005). On the other hand, disinformation refers to intentional misleading of students (e.g. false information about costs or false promises of guaranteed admissions or work opportunities) or misrepresenting the quality of the course or client institution (Galbraith & Brabner, 2013; Huang et al., 2016; ICAC, 2015; Roy, 2017). Agents may also charge students fees against the instructions of the client institutions or engage in other type of financial misconduct, such as stealing tuition fee payments (Galbraith & Brabner, 2013; Guest & Gregory, 2017; Tan, 2015). Limited transparency refers to situations where students are not made aware of the role and responsibilities of the agent or their relationship with the client institution (Roy, 2017; Tamar, 2008). The final category, other unprofessional service, pertains to the quality of service, such as friendliness, pushiness, the speed of communication/application processing from the agent’s side or confidential treatment of student data (c.f. Galbraith & Brabner, 2013; Huang et al., 2016; Roy, 2017).

An agent might disclose unfavourable information about an education provider because of poor financial incentives or other reasons (such as more burdensome application process) to encourage students to apply to or accept an offer at his/her other partner institutions (Australian Government, 2010; Di Maria, 2014). Sometimes these might be better suited for the student in the first place, but this example would often also breach the interests of the students. Most of the other breaches of the education provider’s interests do not go against the

(direct) interests of the students. Limited effectiveness refers to issues with the number and/or the quality of applications and students recruited (Huang et al., 2016). Attempts to manipulate the application process might involve document fraud or writing of personal statements or recommendation letters on the behalf of the student (Bridge Education Group, 2016; Galbraith & Brabner, 2013; ICAC, 2015; Marcus, 2013; Marsh, 2016; Newell & Watt, 2012; Stecklow & Harney, 2016). Other misconduct covers diverse types of unwanted behaviour, such as leaking commercially sensitive information, unauthorised subcontracting, or attempts at financial fraud, such as trying to send commission invoices on wrong grounds (Australian Government, 2010; Di Maria, 2014; Huang et al., 2016; Pattingale, 2007; PhillipsKPA, 2005).

NOTE: One incident of misconduct may be placed in multiple categories. This paper focuses on education provider – contracted agent relationships, and hence other agent related issues identified in the literature were excluded from Table 1. For instance, subverting the visa process (Coco, 2015; Coffey & Perry, 2013; Galbraith & Brabner, 2013; PhillipsKPA, 2005) was categorised primarily to breach the interests of the destination country as a whole (Nikula & Kivistö, 2017). Also excluded were agent-to-agent disputes (e.g. Huang et al. 2016), or issues with uncontracted agents, such as poaching of students (e.g. (Australian Government, 2010; Ross, 2016) or unauthorised agents claiming to represent a provider (Pattingale, 2007).

Table 2. Description of the reviewed documents

	Source	Country	Description
<b>Best practice guidelines</b>			
1	Australian Government, 2009	Australia	Department of Education, Employment and Workplace Relations' guide to 'support Australian education and training providers in their use of education agents' (p.1). (7 pages)
2	Queensland Government, 2009	Australia	Department of Education and Training published guide for the vocational sector to 'provide examples on recognized industry best practice in international education agent management' (p. 3) (41 pages)
3	Victorian TAFE International {VTI}, 2010	Australia	Industry body's guide for the technical and further education sector as 'a practical guide for members to refer to when dealing with Agents' and to 'ensure all members have adequate systems in place' (p. 4). (99 pages)
4	NZQA, 2016, n.d.	New Zealand	New Zealand Qualification Authority's {NZQA} 'broad advice' for all providers recruiting international students to 'establish practices that meet the legislative outcomes' (p.4). (43 pages plus a website resource)
5	AIRC, 2016	United States	Industry body's document outlining its members' perceptions (i.e. not official AIRC guidelines) of the baseline and best practices (p. 2) to 'assist institutions in their own development and best practice'. (p. 2) (42 pages) (APA: American International Recruitment Council, 2016)
6	NACAC, 2013	United States	Industry body's guide for schools, colleges and universities to 'assess their readiness to develop or continue partnerships with these enterprises {education agents} and to enhance their quality' and to help 'mitigate risks inherent in the activity' (p. 4) (23 pages) (APA: West & Addington, 2013)
7	NAFSA, 2014	United States	Industry body's report authored by David L. Di Maria for "sharing basic information and tips related to successfully managing relationships with recruitment agencies" (p. 1) (10 pages) (APA: Di Maria, 2014)
8	NAFSA, 2017	United States	Industry body's book chapter authored by Stephanie Scoby advising institutions wanting to partner with agents (16 pages) (APA: Scoby, 2017)
<b>Second layer of documents reporting on existing practices</b>			
9	Raimo, Humfrey, & Huang, 2015	United Kingdom	The report was financially supported by the British Council and is available on the British Council website. The report aims to conduct a 'review of UK universities approaches to agent relationships' based on findings from qualitative interviews (p. 3). (31 pages). Findings of the study have also been published in an academic journal article (Huang et al. 2016)

10	Coffey and Perry, 2013	Canada	Report written as part of contract with the Council of Ministers of Education based on a survey and interviews with providers to offer a 'scan of agent use in Canada's education systems' (p.5) (90 pages)
11	Coco, 2015	United States	Doctoral dissertation based on a case study of four higher education institutions to explore the 'practice of utilizing agent as an international recruitment strategy in a United States context', including aspects such as the assessment of these relationships (p. 11) (217 pages)
12	O'Connell, 2012	Australia	Doctoral dissertation based on interviews with staff from eight Australian universities examining the 'governance mechanisms ... adopted by universities to obtain a more productive and sustainable working relationship with the education agents' (p. 24) (387 pages)
13	ICAC, 2015	Australia	Independent Commission against Corruption (New South Wales) produced report covering 'what actions universities in NSW can take in order to manage the corruption risks created by their international student business' (p. 5) based on interviews with all publicly-funded universities in New South Wales and other stakeholders. (30 pages)

Table 3. Proposed monitoring tools

No	Student data analysis	Field audit	Constant Contact	Customer feedback	Mystery shopping	Peer sharing	Marketing audit
Best practice guidelines							
1	X	X	(X)	X			X
2	X	X	(X)	X			
3	X	X	(X)	X			X
4	X	X	(X)	X		X	X
5	X	(X)	(X)	X			
6	X	X	(X)	X			
7	X	(X)	(X)	X			
8	X	X	(X)	X		X	
Second layer of documents							
9	X	(X)	(X)	X	X	X	X
10	(X)	(X)	(X)	X		X	
11	X	X	(X)	X		(X)	
12	X	X	(X)			X	
13	X	X	(X)			X	

Note: X = mentioned; (X) = mentioned, but not as an explicit monitoring tool

Note: In certain instances, examples of relevant categories were identified, but with a vague (if any) link to monitoring. For example, the Australian Government (2009) recommends education providers to 'keep regular contact with your education agents so that they are promptly informed of any changes to your institution's arrangements' (p. 4). This does not implicitly constitute a monitoring technique, as the objective of the contact is to distribute information, not collect it. The 'other' category included methods such as talking to all internal stakeholders (e.g. admission staff), conducting joint marketing activities, and the number of partnership introductions.

Table 4. Effective monitoring tools for identifying issues in education agent behaviour

	Student data analysis	Field audit	Constant contact	Customer feedback	Mystery shopping	Peer review	Marketing audit
Misinformation	X	X	X	X	X	X	X
Disinformation	X			X	XX	X	X
Financial misconduct				X	XX	X	
Limited transparency				X	XX	X	X
Unprofessional service		X		X	X	X	
Unfavourable information	X				XX		X
Limited effectiveness	XX						
Manipulation of documents					XX	X	
Other misconduct (see Table 1)	X			X		X	

Note: XX = an effective tool for systematic monitoring; X = an effective tool for identifying some of the key issues in Table 1

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