



UNIVERSITY  
of HULL

**Request Reference: 3499**

FOI Request dated 23/09/2025 –

*Please provide the following information:*

- *A list of the international recruitment agency firms that the university has paid to help recruit overseas students.*
- *Please provide a breakdown of the amount of money paid to these firms, broken down annually since 2019/20.*
- *The commission rate the university pays these firms. (If there is no data available on this, please provide information regarding the university's general policy on this matter.)*
- *Any policies the university may have to ensure quality provided by the agency partnership and to safeguard prospective students.*

**Response**

- A list of the international recruitment agency firms that the university has paid to help recruit overseas students. - A full list is publicly available on our website [International Students | University of Hull](#)
- Please provide a breakdown of the amount of money paid to these firms, broken down annually since 2019/20.

The University of Hull can confirm we hold this information. However, we consider that the detail of these formal agreements and commission figures are commercially sensitive, and is therefore exempt from disclosure under section 43(2) of the FOI Act.

Section 43(2) sets out that information is can be withheld if disclosure would, or would be likely to, prejudice the commercial interests of any person or organisation, unless there is an overwhelming public interest in disclosure.

The recruitment of international students is an extremely competitive marketplace. To reveal the number of agreements held, the numbers of students recruited and the value of agreements would disadvantage both the University, and the agents with whom we work, by revealing sensitive commercial information to competitors.

It would not be difficult for those with some understanding of the marketplace to establish which organisations the University works with, and therefore calculate how much individual agreements are worth. To reveal the nature and value of agreements held with agents would allow their competitors to undermine them, unfairly disadvantaging incumbent providers. We consider that this would, in turn, be likely to damage relationships between the University and agents, dissuading agents from working with the University in the future, or increasing cost to secure agreements. Any damage to working relationships

between the University and its existing agents carries a risk that the agreement will not be renewed on current terms, and the University will lose out commercially as a result.

The University would also be likely to suffer commercial disadvantage by revealing our commission rates following the engagement of agents. This could allow other competitor universities within the UK and worldwide to change their approaches in the market (reduce charges, offer more favourable terms etc.), benefiting from the advantage of this information.

Although there is a transparency required for how we as a University use our funding, if we were to publish how many agents and how much total commission we have paid, it would be relatively simple to work back through tuition fees (which are publicly available) and work out what are commission rates are. Further to this sharing our international enrolment data in this way could provide competitors with valuable market intelligence on the profitability or otherwise of our agents portfolio.

We are therefore satisfied that the disclosure of the requested information would be likely to prejudice the commercial interests of both the University, and agents with whom we agreements with. Therefore Section 43 (2) is engaged on this occasion.

- The commission rate the university pays these firms. (If there is no data available on this, please provide information regarding the university's general policy on this matter.) - This is commercially sensitive as above.
- Any policies the university may have to ensure quality provided by the agency partnership and to safeguard prospective students.
- We use the Agents Quality Framework [AQF: UK Quality Framework for Education Agents | Buila UK](#) to provide our framework for working with and managing agents

Also from our International Student Policy -

#### 5 Admissions requirements for international students

5.1 The Admissions Service is responsible for assessing applications from international students to study at the University of Hull. If a student requires Student visa sponsorship, the decision to accept and sponsor the student for study is made in collaboration with the International Engagement and Compliance Team (IECT).

5.2 To make an offer to study, the University must be satisfied that:

- a. The applicant is a genuine student;
- b. They meet the academic entry requirements for the course, and;
- c. They have permission to study in the UK or are eligible to be sponsored under the Student route.
- d. The student must also have valid ATAS clearance, if this is a requirement of their course and immigration permission.

#### English language requirements

5.6 Students must demonstrate that they meet the required level of English language proficiency for their course. Students must prove they can read, write, speak and understand English at CEFR level B2 or equivalent (unless they are studying a Pre-Sessional English course, where the requirement is CEFR B1). Some courses require a specific level of English language proficiency which is higher than CEFR B2 and the student must meet whichever is the higher of these requirements.

5.7 Some students may be exempt from taking an English language test. This includes students who are nationals of a country defined as majority English-speaking by UKVI, and students who have passed an

academic qualification equivalent to a UK degree in the UK or a majority English-speaking country (as defined by UKVI).

5.8 The University may implement additional measures to confirm a student's English language proficiency if this is deemed appropriate following an interview or in advance of their enrolment onto the course.

#### Interviews and credibility requirements

5.11 Some students may be required to attend and pass an interview as part of their application to study. The interview may be conducted by an external agency on behalf of the University of Hull. Interviews can be requested at any point before a CAS is issued.

5.12 If the student does not pass the interview, the offer of study will be withdrawn. Students may be offered a second interview if the first was inconclusive. If the student fails to attend the interview, the offer of study may be withdrawn.

#### Agents

5.13 The University engages the services of educational agents to fulfil certain roles and responsibilities to support applicants on behalf of the University. Agents are bound by the terms and expectations outlined in their contracts and the Agent Handbook and are expected to work with the University to recruit genuine students and meet the University's responsibilities as a Student visa sponsor.

5.14 Agent contracts and relations, including training and quality assurance, are managed by the Global Student Recruitment Office (GSRO). The GSRO conduct annual reviews of the agent portfolio and throughout the year following each intake.

5.15 Information regarding agents used to recruit international students is shared with UKVI as required by the University's sponsor licence.