



INTO Global (UK) AQF Audit and Success Plan Summary

July 2025

Prepared for

INTO 



Background and purpose of the audit

All UK institutions that wish to enrol international students must obtain a UK Visa and Immigration (UKVi) Sponsor Licence. They must be able to demonstrate transparency in their activities and adherence to government-mandated standards to protect the international education industry and maintain the integrity of UK migration policy.

In 2025, UKVi advised the sector that institutional adherence to the UK Agent Quality Framework (AQF) Pledge is now a requirement of all student Sponsor License holder institutions and may form part of their review process.

The AQF, as defined by the British Council, is 'a set of tools to enhance the experience of international students working with education agents and counsellors to apply to study in the UK'. The AQF is designed to ensure agents and counsellors have the right knowledge of the UK as a study destination and understand the integrity of the UK visa and immigration system, in order to uphold the UK's reputation as a world-class study destination. The AQF Pledge is 'a digital marker displaying an institution's commitment to the checks and balances contained in the AQF'.

INTO Global (UK) commissioned Edified, a global education consultancy, to conduct an independent AQF audit of its agent management practices, for reassurance that, as a recognised UK provider of education to international students, it adheres to the commitments of the UK Agent Quality Framework (AQF) Pledge.

This 'AQF Audit and Success Plan' covers the policies and processes that govern and impact INTO's education agent management practices related to four AQF pledges:

- 1 Empowering student choice and enabling informed decision making
- 2 Ensuring good agent governance and professionalism
- 3 Promoting ethical agent practices, professional knowledge and competency
- 4 Increasing transparency and accountability

Audit summary

Key findings:

This audit found that INTO has robust agent management practices in place that aid student choice, optimize agent (and sub-agent) practice and demonstrate clear compliance with AQF Pledge commitments.

INTO demonstrates transparency in its activities and overall adherence to government-mandated standards to protect international students and the international education industry.

INTO received recognition for a total of 34 ‘best practice’ areas of its work that exceed AQF Pledge requirements and demonstrate industry-leading practices.

In addition, 18 best practice recommendations are made, which, if acted upon, would move INTO’s practice from ‘compliant’ to ‘sector-leading’.

There are no AQF Pledge compliance-related ‘priority issues to be actioned’, but the audit has identified five areas as ‘further areas for improvement’ in relation to AQF Pledge commitments. These areas for improvement primarily relate to intuitive web navigation rather than missing information.

Examining and actioning these ‘further areas for improvement’ will ensure that INTO is managing potential risks effectively.

Methodology

This review took place at the end of March 2025, with intensive stakeholder engagement in early April 2025, and was led by an independent, experienced auditor with several decades of compliance, admissions, student service and marketing experience within UK and international institutions, and who developed many aspects of the AQF on behalf of the UK sector. Additional Edified experts were used to provide support in specialist areas. INTO assisted this review by procuring documentation, providing access to systems and records as requested, and making staff available for interviews and follow-up questioning.

The audit scope covered all the commitments across the four components of the AQF Pledge. Audit objectives were outlined and agreed upon, including the requirement of the auditors to review relevant business processes that support and contribute to INTO’s compliance – not simply a review of the standards against INTOs understanding of its obligations.



Status of AQF Pledge compliance – overview

The following tables provide a high-level overview of INTO’s compliance with the AQF Pledge commitments.

Across all 17 AQF Pledge commitments, INTO has demonstrated capacity and capability to create policy, procedures and practices that adhere to and meet minimum standards at the least.

INTO were awarded ‘Best Practice’ status across 34 pledge commitment sub-categories






Where INTO needs to address non-compliance, these areas are labelled as Priority issues to be actioned. Where there are isolated instances of discrepancies or inconsistencies in approach, these are labelled as Areas for improvement. Colour coding has been applied to each relevant compliance matter.

Based on interviews, documents, artefacts, and evidence provided for the purposes of this external audit, four categories of action and recognition have been applied:






 Priority issues to be actioned INTO should consider these as the most important findings and areas of non-compliance. INTO should take immediate corrective action to meet AQF Pledge compliance commitments.	 Areas for improvement INTO should review and consider corrective steps to mitigate current and future risk, and demonstrate compliance with AQF Pledge commitments. These areas may reflect discrepancies or inconsistencies in approaches.	 Move to best practice INTO practices are currently compliant with AQF Pledge commitments in these areas. INTO may consider enhancements to its practices to move towards agent management best practice.	 Agent management best practice INTO’s practice exceeds AQF Pledge requirements and demonstrates excellence in these areas.
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AQF Pledge summary compliance tables

1 Empowering student choice and enabling informed decision making




Institutional commitment	Status
1.1 Proactively disseminate the A Student Guide to Choosing an Education Agent (Student Guide) document directly and indirectly to international students.	
1.2 Actively encourage contracted agents to host the Student Guide on their website/s and to agree, where feasible, to send a copy to all students who engage their services.	
1.3 Make school counsellors aware of the British Council's UK education agent and counsellor training.	
1.4 Regularly monitor and update the details of our contracted agents, as listed on our website.	
1.5 Provide students with a clear channel for lodging a complaint if they are dissatisfied with their experience of using a specific education agent.	

2 Ensuring good agent governance and professionalism

Institutional commitment	Status
2.1 Include relevant clauses about the National Code in agent contracts.	
2.2 Highlight the need for contracted agents to commit to delivering a quality student experience.	
2.3 Embed governance processes throughout our agent contractual cycle to deliver the highest quality service, including during selection, due diligence, contracting, training, planning, and ongoing reviews and contract renewals.	
2.4 Embed high-quality agent management collaborative practices. Plan together and jointly agree on objectives to ensure information and best practices flow in both directions.	
2.5 Make all AQF collateral available to our agent network in our onboarding and training materials, and by hosting these on our agent portal or webpage/s.	





3

Promoting ethical agent practices, professional knowledge and competency

Institutional commitment		Status
3.1	Evaluate our agents' compliance with the National Code of Ethical Practice by including an audit of National Code standards in our [annual] review processes.	
3.2	Agree on a minimum level of engagement for all agent personnel who provide advice and assistance to prospective students, to study and complete an appropriate UK accredited training programme.	
3.3	Promote the principles of the AQF framework in all our agent and student recruitment and engagement work.	

4

Increasing transparency and accountability

Institutional commitment		Status
4.1	Request transparency around the use of sub-agents and clarity that the National Code of Ethical Practice applies to any sub-agent partners working with the contracted agent.	
4.2	Request clarity on the processes for training, managing and quality-assuring sub-agents.	
4.3	Be clear that the completion of an appropriate UK certified training programme is applicable for all student-facing staff within sub-agents.	
4.4	Through the promotion of the Student Guide, increase transparency of the commercial aspect of agent-institution relationships.	

Company profile

Edified is a specialised consulting firm focused exclusively on the education industry.

Working across Australia, NZ, the UK, and North America, our team is driven by a belief in the power of education to change lives. We help education providers and government bodies solve challenges in marketing and recruitment, admissions, pricing and student experience.

Our clients say that Edified ‘gets them’ like no-one else does. All our people have held senior roles in education institutions, so we understand the nuances and opportunities of the sector.

We’ll help untangle your most complex problems and unearth insights that give you the confidence and clarity to take action.



Our aspiration

To be the education sector’s favourite consulting firm

Our values

Integrity, respect, excellence, inclusivity, happiness

Social responsibility

- Edified is committed to making the world a better place to live in:
- We carbon offset any travel associated with the delivery of this document.
- All of our print work is done on FSC paper and we only use eco inks.

Every year we co-fund and run a grants program called Energiser to support students and recent graduates around the world to deliver innovative programs to improve education in their communities.

Edified acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

Edified is a place free from discrimination, where everyone belongs. We respect and celebrate the diversity of our communities, including people of all cultural and faith backgrounds, classes, gender or sexual identities, ages and abilities and we are committed to being a safe and welcoming space for all.

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