

Engaging Education Agents Policy and Procedure



Purpose

The main purpose of Engaging Education Agents Policy and Procedure is to outline the measures taken by CAC to manage the activities of education agents ensuring that they adhere by ethical standards and maintain integrity. It aims to provide procedures for monitoring education agents' activities and the ability to terminate agreement with false or misleading recruitment practices.

Scope

Engaging Education Agents Policy would aide CAC to engage with education agents who have appropriate knowledge and understanding of the Australian education industry. It would also aide prospective students make informed decision prior to enrolment in courses within CAC's scope of registration.

Relevant standards, acts and legislation

Engaging Education Agents Policy and Procedures adheres to the Standards for Registered Training Organisations (SRTO's) 2015 Standards 4 clause 4.1; ESOS Framework (ESOS ACT 2000) Standard 4, 1, 2, 3 and 7.

Definitions

Term	Definition
Authorised delegates	An authorised delegate means an employee/s of the RTO who has been formally delegated the function of selection and recruitment from the CEO or equivalent and signed the Authorised Delegates Register.
BDM	Business Development Manager
BDO	Business Development Officer
CEO	Chief Executive Officer
COE	Certificate of Enrolment (COE) is an official document issued to the international students, in order apply for their student visa. It confirms that they have been accepted in a course and paid their fees.
Conditional Offer	Conditional offer letter means that student have not yet satisfied academic, English language or any other entry requirements. It includes details of offer conditions and how they can satisfy these requirements (including paying course deposits) will be mentioned in this offer letter.
Corrective Actions	Corrective may include providing additional information/material or targeted training in, for example, the expectations of the provider. Corrective action may also include termination of the agreement with the education agent.
DOS	Director of Studies
Dishonest Practices	Dishonest practice includes but may not be limited to a. engaged in, or to have previously been engaged in, dishonest practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Transfer between registered providers); b. facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa c. using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than bona fide a student; or d. providing immigration advice where not authorised under the Migration Act 1958 to do so.

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Term	Definition
ESOS Framework	Education Services for Overseas Students Act 2000 is a national code that applies to delivering of education and training courses to overseas students.
LLN test	LLN stands for Language, literacy and numeracy, a skills test which is given to the students prior to the commencement of the course to determine any additional support or resources they may require to complete the course.
Offer letter	Offer letter is a formal letter of offer, which includes information on students' programme of study, tuition fees, deposits, start date and any academic/non-academic conditions they may need to satisfy.
Preventative action	Preventative action could include training sessions for agents and ensuring they have all the material they need to represent the provider accurately and professionally.
Standards for Registered Training Organisations (SRTTO) 2015 (also referred as Standards)	A legislative instrument describing the minimum standards to be met by RTOs through the VET Quality Framework. The VET Quality Framework is aimed at achieving greater national consistency in the way providers are registered and monitored and in how standards in the vocational education and training (VET) sector are enforced. http://www.asqa.gov.au/about-asqa/national-vet-regulation/vet-quality-framework.html
Unconditional offer letter	Unconditional offer letter means that student satisfies all the academic, English language and other conditions for enrolment.
USI	Unique Student Identifier is a code generated online, all student undertaking nationally recognised training delivered by a registered training organisation need to provide their USI before enrolment
VET	Vocational education and training (VET) enables students to gain qualifications for all types of employment, and specific skills to help them in the workplace.
VTG	Victorian Training Guarantee
Third Party Providers	Third Party means any party that provides services on behalf of the RTO but does not include a contract of employment between an RTO and its employee.
RPL	Recognition of prior learning

Policy

This policy affirms the commitment of CAC to ensure ethical and accountable practices in selection and recruitment of students by engaging educational agents who are compliant with the National Code. The policy ensures:

- A written agreement is made with each education agents who formally represents Central Australian College.
- To ensure that CAC representative education agents comply with National Code and recruit students in ethical and responsible manner that enables students to make informed decisions about enrolment.
- To ensure that CAC representative agents have up-to date and accurate marketing information.
- CAC would ensure to take immediate corrective and preventative action in case it becomes aware of the negligent, careless, incompetent or being engaged in false, misleading or unethical advertisement and recruitment practices, including practices that could harm the integrity of Australian education and training.

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- CAC has the right to terminate the agreement with an education agent if it becomes aware of, or reasonably suspects that agents has engaged in dishonest practices.

In order to achieve the above mentioned policy statements, the BDM/ CEO shall arrange for:

1. Agents eligibility check
2. Education Agent Agreement
3. Updating agents about Continuous Improvement
4. Monitoring agents activities
5. Terminating 'Education Agent Agreement'

Procedures

Central Australian College (CAC) will ensure the following procedure is practiced and implemented for the recruitment and monitoring 'Education Agents' formally representing CAC:

1. Agents Eligibility Check

- a. Prospective education agent who wishes to formally represent CAC should provide in written an expression of interest to BDO or CEO/ BDM.
- b. It would be followed by filling up an application form.
- c. A background check would be conducted on the prospective agents which would include a reference check form filled up by their referees.
- d. Once the eligibility is determined CAC and the Education Agent would engage in formal written agreement.

2. Education Agent Agreement

- a. Any person who is formally engaged by CAC to promote it's courses with the intention of recruiting students for CAC shall be required to be approved by the CEO/BDM who shall initiate an 'Education Agent Agreement'
- b. All persons approved as an Education Agent shall be required to sign an 'Education Agent Agreement' prior to undertaking any promoting activities on behalf of CAC.
- c. CAC will not enter into an agreement with any Education Agent or potential Education Agent if it knows or reasonably suspects the Education Agent to be:
 - i. Engaged in, or to have previously been engaged in, dishonest practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Transfer between registered providers);
 - ii. Facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa
 - iii. Using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than bona fide a student; or
 - iv. Providing immigration advice where not authorised under the Migration Act 1958 to do so.
- d. All agents who are approved by CAC and have a signed agreement as an Education Agent shall be paid an agents fee as outlined in their specific agreement.

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- e. The agreement, conditions, and authorisation to promote CAC relates to the Education Agent named in the agreement and, any sub-contractors or employees of the Education Agent must be authorised by CAC.
- f. The original signed agent agreement shall be kept in the Education Agents file and the Education Agent shall also receive a copy.
- g. CAC maintains an 'Education Agents Register' that lists all education agents with current agreements with Central Australian College.
- h. This register contains the following details:
 - Education Agents Business Name
 - Contact Person
 - Address
 - Contact Details
 - Area the Education Agent is operating
 - Dates of engagement
 - Number of students referred to CAC
- i. CAC will publish a list of all its active education agents on the website and ensure that they are kept up date.

3. Updating agents about continuous improvement

- a. Once an agent has been approved and is registered within CAC a full set of marketing materials would be provided to the Education Agent.
- b. Any changes to marketing materials will be provided to the Education Agent as per the 'Marketing Policy and Procedure'.
- c. Agents will always be provided with current marketing material and where changes are made to marketing material, the new material will be forwarded to all agents

4. Monitoring Agent activities

To ensure that CAC is using reputable agents it will initiate a monitoring procedure with all active agents. This monitoring process is outlined below:

- a. Monitoring of Education Agents activities and conduct with prospective students will be gained through feedback collected from students upon enrolment. During the course orientation students will be asked to complete a survey in relation to their dealings with Education Agents that represent CAC. This process ensures that any issues relating to Education Agents providing misleading or dishonest information to prospective students is identified and can be addressed.
- b. All Education Agents must submit a report of their activities once a year. This report is to outline the promotional activities that have been undertaken on behalf of CAC and includes any students that have been contacted or recruited to enrol with CAC. (E-mail will suffice)
- c. All Education Agents will be required to undertake an annual review. Where practical, a face to face meeting will be organised to review the agent's activities but will normally only occur with onshore agents based in Melbourne. Where a face to face meeting is not appropriate CAC will conduct an internal review of the Education Agent's activities. The reviews will include:
 - Overview of current practices and relationship with CAC
 - Ensuring current marketing materials are being used
 - Ensuring representation of CAC is appropriate
 - Discussion of any issues or concerns with the Education Agent or appropriate staff

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- d. The review will be undertaken by the CEO/ BDM. Minutes of any meetings or notes of internal reviews will be taken and kept on the Education Agents file.
- e. Any issues that are identified will be discussed in the Senior Management Meetings (identified through the Quality Management Policy and Procedure), and if required, discussed with the particular Education Agent. This meeting / discussion are to be documented and kept on the Education Agents file.

5. Terminating 'Education Agent Agreement'

- a. Where any practices of the Education Agent are identified as being negligent, careless or incompetent or being engaged in false, misleading or unethical advertising and recruitment practices, including practices that could harm the integrity of Australian education and training, CAC shall take immediate action.
- b. Where the above practice(s) by an Education Agent is identified, the CEO/BDM is responsible for ensuring there is a change of the practices causing concern through counselling the agent or for terminating the agreement. Any counselling or termination of agreements shall be documented within the Education Agent's file.

Policy Reference

- ESOS Standard 4, 1, 2, 3 and 7 (ESOS ACT 2000)
- SRTO 2015: Standards 4 clause 4.1

Relevant Policies and Procedure

- Transfer between Providers Policy
- Marketing Policy and Procedure
- Enrolment Policy and Procedure

Forms and Documents

- Agent's application form
- Agent's reference check
- Education Agents Agreement
- Agent's register
- Agent's certificate

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