1. Policy

This policy/procedure supports ‘Standard 4 – Agents’ of the ‘National Code of Practice for Registration Authorities & Providers of Education & Training to Overseas Students 2007’ which states:

“Registered providers take all reasonable measures to use education agents that have an appropriate knowledge and understanding of the Australian international education industry and do not use education agents who are dishonest or lack integrity.”

In following this procedure CAC will ensure it is able to manage the activities of their Education Agents, ensuring only reputable Education Agents are used.

2. Procedure

Agent Agreements

- 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 who shall initiate an ‘Education Agent Agreement’

- 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.

- 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:
  - 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);
  - Facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa
  - Using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than bona fide a student; or
  - Providing immigration advice where not authorised under the Migration Act 1958 to do so.

- 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.

- 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.

- The original signed agent agreement shall be kept in the Education Agents file and the Education Agent shall also receive a copy.
Engaging Education Agents
Policy and Procedure

Education Agents Register

- CAC must maintain an ‘Education Agents Register’ that lists all education agents with current agreements with Central Australian College.
- This register must contain the following details:
  o Education Agents Business Name
  o Contact Person
  o Address
  o Contact Details
  o Area the Education Agent is operating
  o Dates of engagement
  o Number of students referred to CAC
- CAC will publish a list of all its active education agents on the website and ensure that they are kept up to date.

Agent Marketing Materials

- Once an agent has been approved and is registered within CAC a full set of marketing materials are to be provided to the Education Agent.
- Any changes to marketing materials will be provided to the Education Agent as per the ‘Marketing Policy and Procedure’.
- 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.

Monitoring Agent activities

To ensure that CAC is using reputable agents the college will initiate a monitoring procedure with all active agents. This monitoring process is outlined as follows.

- 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 include any students that have been contacted or recruited to enrol with CAC. (E-mail will suffice)

- 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

The review will be undertaken by the CEO. Minutes of any meetings or notes of internal reviews will be taken and kept on the Education Agents file.

- Further monitoring of Education Agents activities and conduct with prospective students will be gained through feedback collected from students upon enrolment. Through 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.

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.

**Terminating an Education Agent Agreement:**

- 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.

- Where the above practice(s) by an Education Agent is identified, the CEO 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.