

SC7-I: Education Agent Policy & Procedures

International Students

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Purpose

This policy is to ensure that Education Agents with whom Hunter Education Group has written agreements with act ethically, honestly and in the best interests of overseas students, as well as uphold the reputation of Australia's international education sector.

This policy will also ensure that intending students will benefit from the monitoring strategies of Hunter Education Group and from Hunter Education Group ability to terminate agreements with Education Agents who engage in false or misleading recruitment practices.

This ensures compliance with Standard 4 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Definitions

DE means Department of Education

DHA means Department of Home Affairs

Education Agent means 'a person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers.

Education agent does not refer to an education institution with whom an Australian provider has an agreement for the provision of education (that is teaching activities).¹

¹ Definition provided in the definitions section of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*

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Policy

1. Recruitment of Agents

- Hunter Education Group will only work with reputable Education Agents who have an appropriate knowledge and understanding of the Australian international education industry.
- Hunter Education Group will only approve a new agreement where it has sufficient resources to carry out monitoring in accordance with its *Education Agent Policy & Procedures*.

2. Written Agreements

- Hunter Education Group develops and implements a written agreement with each Education Agent that is engaged to recruit students on its behalf. All written agreements are recorded in the *Education Agent Agreements Register*.
- Written agreements will specify all of the following:
 - Hunter Education Group responsibilities, including that Hunter Education Group is responsible at all times for compliance with the Standards for Registered Training Organisations, ESOS Act and National Code 2018.
 - Hunter Education Group requirements for agents who represent them, including the requirement to:
 - declare in writing and take reasonable steps to avoid conflicts of interests with duties as an Education Agent of Hunter Education Group.
 - observe appropriate levels of confidentiality and transparency in dealings with overseas students or intending overseas students.
 - act honestly and in good faith, and in the best interests of the student.
 - have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.
 - Hunter Education Group processes for monitoring the activities of Education Agents in representing the provider, and ensuring the Education Agent is giving students accurate and up-to-date information on Hunter Education Group services
 - corrective action that may be taken by Hunter Education Group if an Education Agent does not comply with its obligations under the written agreement.
 - Hunter Education Group grounds for termination of the provider's written agreement with the Education Agent.
 - the circumstances under which information about the Education Agent may be disclosed by Hunter Education Group and the Commonwealth or state or territory agencies.

3. Reporting and Publication

- A list of Education Agents with whom Hunter Education Group has a written agreement will be included on Hunter Education Group's website. As a minimum this information will include the agency name, name of the principal agent, legal entity and street address.
- Hunter Education Group will advise ASQA of the third-party arrangements in place with Education Agents in accordance with clause 8.3 of the Standards, prior to that agreement taking effect and;
 - Within thirty days of an agreement commencing.

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- Within thirty days of an agreement coming to an end.
- Hunter Education Group will advise DE of all active Education Agents by maintaining a list of all required details within PRISMS that will be updated as agreements are commenced and/or terminated and reviewed annually.

4. Monitoring and termination

- Where Hunter Education Group becomes aware that, or has reason to believe, the Education Agent or an employee or subcontractor of that Education Agent has not complied with the Education Agent's responsibilities, Hunter Education Group will take immediate corrective action.
- Where Hunter Education Group becomes aware, or has reason to believe, that the Education Agent or an employee or subcontractor of the Education Agent is engaging in false or misleading recruitment practices, Hunter Education Group will immediately terminate its relationship with the Education Agent or require the Education Agent to terminate its relationship with the employee or subcontractor who engaged in those practices.
- Hunter Education Group will not accept students from an Education Agent if it knows or reasonably suspects the Education Agent to be:
 - providing migration advice unlawfully, unless that Education Agent is authorised to do so under the Migration Act.
 - engaged in, or to have previously engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of ed providers under Standard 7 (Overseas student transfers).
 - facilitating the enrolment of a student who the Education Agent believes will not comply with the conditions of his or her visa.
 - using PRISMS to create CoEs for other than bona fide students.
- The monitoring activities of Hunter Education Group will identify where an agent may be involved in any of the above activities. Hunter Education Group will also take into account reports from students where the number of students is a reasonable proportion of the students recruited by an agent (e.g. 3 in 10 students).

5. Marketing Materials

- Education agents will be provided with current and accurate marketing information that meets the requirements of Hunter Education Group's *Marketing and Advertising Policy*.

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Procedures

1. Process new Education Agent application

National Code: Standard 4

Procedure	Responsibility
A. Provide information to potential Education Agents Email or post potential Education Agents with the Education Agent Information Kit and <i>Education Agent Application Form</i> for completion.	Managing Director/Marketing
B. Assess application from agent - Acknowledge receipt of application. - Review application for completeness. - Where the application is incomplete, inform the agent of the additional information required and the requirement to provide this within 60 days or that otherwise the application will no longer be valid. - Consider information in application and contact referees as required. (Where the Managing Director has previously worked closely with the Education Agent previously, referee requests and checks may be waived.) - Assess application based on the responses from referees, the location that the agent will recruit from, the demonstrated understanding of Australian laws in regard to student recruitment and agent experience in the recruitment of international students. - Approve or refuse application. - Notify agents in writing of the decision to approve or not approve the application and including reasons where the application is declined.	Managing Director/Marketing

2. Confirm agreement

Relevant to National Code: Standard 4

Procedure	Responsibility
A. Confirm agreement with new Education Agent Send two copies of the written agreement to agent for signing with one to be returned. The agreement will be valid for one year for new applications.	
B. Report and publish new or ended third party agreements - Ensure details are maintained at all times in the event of changes. - Add/remove or update details in ASQAnet. - Under Organisation > Third Party Service Arrangement - Record name of provider, contact person details, start and end dates of the agreement and the type of service to be provided ('recruitment of prospective learners').	

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Procedure	Responsibility
- Add/remove or update approved agent to <i>Education Agent Agreements Register</i>. - Add/remove or update details of approved agencies listed on the website. Include the following details: - Agency business name - Agency Legal name (if different) - Agency website - Agency phone number - Agency City and Country - Add/remove or update the following details for approved agents into PRISMS (under Manage Agents) - MARA/Overseas Education agent Id (if known – optional) - Given Name: - Email Address: - Business Name: - Agency Name: - Country: - State: - Suburb/City:	
C. Renew existing agent agreements - For existing Education Agents and subject to effective performance, provide copies of renewed agreements for signing. Existing agreements will generally be renewed for a further three years. - Update <i>Education Agent Agreements</i>. - Update any revised details in ASQAnet and via PRISMS.	Managing Director/Marketing

3. Implement agent agreement

National Code: Standard 4

Procedure	Responsibility
A. Induct new agents - Provide an induction regarding Hunter Education Group's course offerings - Provide an overview of Hunter Education Group's current marketing - Discuss student enrolment and selection process - Provide approved marketing materials and discuss process for updating any revised marketing materials.	Managing Director/Marketing

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Procedure	Responsibility
- Discuss and clarify National Code 2018 requirements and Hunter Education Group's <i>Education Agent Policy & Procedures</i>. - Confirm dates for review of Agreement and targets to be achieved.	
B. Provide up to date information to agents - Provide up to date information to agents through: - Email monthly newsletters regarding important information for agents. Ensure each newsletter identifies by version numbers/name the most current documents/links, so that the agents are able to easily check they are using the most current up to date material available. - Emails, phone calls, text messages or other informal communications regarding specific student issues - Delivering seminars and marketing events with agents when Hunter Education Group representatives are available in the agent's region. - Publishing content on Hunter Education Group's website and social media profiles	Managing Director/Marketing
E. Provide up to date marketing information to agents - Provide up to date marketing information to agents each time marketing information is updated. - Send updated marketing information via email or post. - Where the web site is updated, email agents with a link to the updated web site and provide a summary of changes. - Check that emails have been received from all agents confirming that they are using new versions and have removed, taken down or destroyed previous versions. - Follow up agents who have not sent this email confirmation to ensure they send it immediately.	Managing Director/Marketing
F. Monitor Education Agents - Implement monitoring procedures as per written agreement including: - Documented face to face meetings and/or teleconferences with agents at least every six months - Analysis of quality and quantity of applications on behalf of prospective students - Analysis of conversion rates from lodging applications to studying at Hunter Education Group. - Requirement for a quarterly report documenting the number of students interviewed by the agent either in their offices or at other venues such as education fairs.	Managing Director/Marketing

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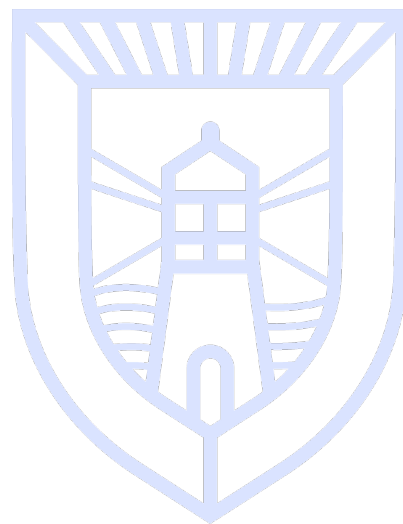
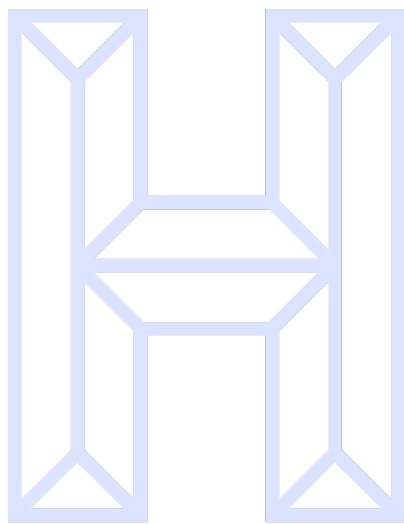
Procedure	Responsibility
– Documenting on the agent's file instances where students claim to have been misinformed about their studies at Hunter Education Group. – Documenting on the agent's file instances where the agent has shown a lack of knowledge of student visa requirements or other matter relating to the student's stay in Australia. – Surveying current and prospective students about the information provided to them by the Education Agent and the level of assistance given to the student to assist them in travelling to Australia. • If at any time, monitoring procedures show that the agent is not meeting the terms as specified in the written agreement, investigate the issue as shown below. • Where an agent is meeting the terms as shown in the written agreement, provide written feedback to agent indicating such.	
G. Investigate agents who are not meeting the terms of their agreement • Seek feedback from the agent on the issue. • Discuss issue with CEO and decide on action as follows: – Where it is considered that there was no breach of the agreement, write to agent confirming this. – Where corrective or preventative action is required, inform agent in writing of breach and action required and timelines. – Where breach is considered to be major, inform agent of the reasons, terminate agreement and report to DHA and DE. Remove agent from . • Where an agent is required to implement corrective or preventative action, monitor agent to ensure that actions are implemented according to agreed timelines. If actions are not implemented, terminate the agreement as above. • Keep all documentation on file.	Managing Director/Marketing

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