

## EDUCATION AGENTS POLICY AND PROCEDURE

### 1. PURPOSE

The purpose of this policy is to ensure that education agents engaged by The Lan-Grove Office Training Centre Pty Ltd trading as The Sydney Business and Travel Academy (SBTA) and The Lan-Grove Office Training Centre (SELA) herein known as “The Academy” act ethically and honestly and in the best interest of overseas students and uphold the reputation of Australia’s international education sector.

### 2. SCOPE

This policy applies to all education agents who have a written agreement with The Academy.

### 3. POLICY STATEMENT

The Academy will ensure that it has a written agreement with each education agent that formally represents their education services and enter and maintain the education agent’s details in Provider Registration and International Student Management System (PRISMS).

The Academy will ensure that:

- a) It has a written agreement with each education agent they engage with;
- b) enter and maintain education agent details in Provider Registration and International Student Management System (PRISMS);
- c) ensure education agents have appropriate knowledge and understanding of the Australian International Education and Training Agent Code of Ethics;
- d) ensure education agents act honestly and in good faith;
- e) take immediate corrective action, or terminate a relationship if an agent (or an employee or subcontractor) is not complying with the National Code; and
- f) not accept overseas students from an education agent if it knows or suspects that the education agent is engaging in unethical recruitment processes.

### 4. PROCEDURE

#### 4.1 Prior to entering into a Written Agreement

Prior to entering into a Written Agreement, The Academy will ensure that the marketing team:

- a) will ensure that the education agent completes an Agent Application form;
- b) reviews the education agent’s past performance via third party feedback and agent’s website;
- c) contacts at least two (2) references to verify the education agent’s performance;
- d) informs the education agent of The Academy’s policies and procedures and ensures that the education agent is aware of the need to observe appropriate levels of confidentiality and transparency in dealings with overseas students while acting honestly and in good faith;
- e) provides the education agent with accurate, relevant and up to date information about The Academy’s courses, terms and conditions of enrolments;

- f) ensures that the education agent declare and take all reasonable steps to avoid conflicts of interest with its duties as an education agent of The Academy. Examples of conflicts of interest include, but are not limited to:
  - ❖ when the agent charges services fees to both overseas students and registered providers for the same service;
  - ❖ where an education agent has a financial interest in a private education provider; or
  - ❖ where an employee of an education agent has a personal relationship with an employee of the education provider.
- g) ensures that the education agent completes The Academy's training course. The training course can be activated by the agents clicking on the link sent by The Academy. Once the training course is completed the Agent is sent a Certificate of Attendance to verify their attendance;
- h) ensures that the education agents have appropriate knowledge and understanding of the overseas education system in Australia, including the Australian International Education and Training Agent Code of Ethics.
- i) Ensures that the education agent, including offshore agents, have The Academy's up-to-date and accurate marketing information; and
- j) completes a Written Agreement which outlines the following:
  - ❖ The Academy's registered provider's responsibilities, including for compliance with the Education Services for Overseas Students Act 2000 (ESOS Act) and National Code 2018;
  - ❖ the requirements of the agent in representing The Academy;
  - ❖ The Academy's processes for monitoring the education agent's activities and ensuring the education agent gives overseas students accurate and up-to-date information;
  - ❖ Education agents must ensure that recruitment of students is conducted at all times in an ethical and responsible manner consistent with the requirements of the relevant course or curriculum as detailed in marketing materials published by The Academy.
  - ❖ the corrective actions that may be taken and the grounds for termination of the written agreement with the education agent; and
  - ❖ the circumstances which information about the registered provider may be shared by the registered provider and Commonwealth or state and territory agencies.
- k) The Academy will enter and maintain the details of education agents with whom it has a written agreement with in PRISMS.

#### **4.2 Education agent's monitoring activities**

Education agents are monitored on an ongoing basis by the marketing team. Monitoring may occur using a variety of methods which includes but not limited to:

- ❖ Informal and formal feedback
- ❖ Agent visits and meetings
- ❖ Reports from education agents and other external stakeholders
- ❖ audit checklist to evaluate agent's performance prior to renewal of the agreement.

#### **4.2 Immediate Corrective action**

- a) The Academy will take immediate corrective action if The Academy is aware that or believe the education agent or its employee or subcontractor, have not complied with the education agent's responsibilities under Standard 4. Corrective actions may include

providing education agents with additional information or targeted training on expectations of the agent.

- b) If The Academy becomes aware, or has reason to believe that an education agent is engaging in false or misleading recruitment practices, The Academy will immediately terminate its relationship with the education agent.
- c) If the false or misleading recruitment practices were engaged in by an employee or subcontractor of the education agent, The Academy will require the education agent to terminate its relationship with those individuals.
- d) The Academy will not accept students from education agents if The Academy believes the education agent is engaging in unethical recruitment practices. This includes education agents that provide migration advice to overseas students when they are not authorised to do so under the Migration Act 1958.

#### 4.4 Record keeping

Copies of all signed agreement with the education agent will be stored electronically under the agent’s file including all correspondence with the agent.

### 5. CONTINUOUS IMPROVEMENT

This policy and procedure will be reviewed according to the Continuous Improvement Cycle on an annual basis.

### 6. EVIDENCE

- ❖ Education Agent’s Agreement
- ❖ Education Agent Policies and Procedures
- ❖ Marketing Policy and Procedures
- ❖ Website

### 7. RESPONSIBILITY

- Principals
- Marketing Team
- Education Agents
- Student Services Coordinator
- All staff

### 8. RELATED STANDARDS

Standards for RTOs

National Code of Practice 2018 Standard 4: Education Agents

ESOS Act 2000

The Migration Act 1958

Approved by: Jane Koch

Signature: *Jane Koch*

Date: 12/1/2018

Version	Created by:	Date created	Reason for update	Implementation date
1	Jane Koch, CEO	September	Updated to read in plain English	December 2015
2	Jane Koch, CEO	January 2016	Updated to reflect Standards	23/2/2016
3	Jane Koch, CEO	9/1/2018	Updated to reflect changes to Standards to RTOs and National Code of Practice 2018	12/1/2018