

Policy Number & Name: RTOPRO030 International Education Agents Policy

Policy Area: Crown College International – International Students Only

Authorised by: Internationalisation Advisory Committee

CRICOS Provider No **03582D**

Organisation Definition:

Crown Melbourne Limited trades as Crown Melbourne Limited, Crown College and Crown College International. For the purpose of this policy, any reference to Crown College, or the “college” should be considered a reference to any of these respective trading names.

1. Policy

1.1 This policy has been developed by Crown College International to outline the process for selection and performance management of its International Education Agents in order to satisfy the requirements of the ESOS Act and National Code (Part D, Standard 4) which states that: “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”.

1.2 Crown College International takes all reasonable measures to ensure that the International Education Agents it engages are ethical, professional and have a good working knowledge of:

- i. The National Code 2007;
- ii. The ESOS Act;
- iii. The Education Agents Code of Ethics;
- iv. Crown College International’s values.

1.3 Crown College International will not recruit or maintain a relationship with any International Education Agent who is unethical, dishonest, or does not adhere to the principles of the agreement.

2. Scope

2.1 This policy applies to all International Education Agents, or their employees engaged by Crown College International, on any basis and at all times.

3. Responsibility

3.1 The Sales and Marketing Officer will manage and monitor all International Education Agents continuously and consistently against this policy, procedures and Agent Agreements.

4. Procedures

4.1 Crown College International engages International Education Agents as its representatives for the specific purpose of providing recruitment services of suitable and committed prospective international students for enrolment into full time study programs at Crown College International.

4.2 All International Education Agents engaged by Crown College International must ensure high standards of ethics are demonstrated to prospective students throughout all pre-enrolment and follow up services (if applicable) in accordance with the International Education Agent Agreement, all relevant policies, procedures and guidelines and the requirements of the ESOS Act and the National Code.

4.3 Crown College International will only appoint agents with suitable company structures in their relevant country or in Australia where relevant. All prospective agents will be required to complete an International Education Agent Application Form for consideration to become an official agent for Crown College International and all referee checks will be completed before the consideration of the issue of an Agent Agreement.

4.4 The following procedures are to be adhered to by all Crown College International Education Agents:

4.4.1 Crown College International will specify the responsibilities of the International Education Agent and Crown College International and the need to abide by the ESOS Act and the National Code 2007.

4.4.2 Crown College International will ensure its International Education Agents have up-to-date and accurate marketing information provided by Crown College International.

4.4.3 Crown College International will monitor the performance of its International Education Agents and take action, including terminating the agreement, when the International Education Agent does not fulfil its responsibilities.

4.5 Selection criteria

4.5.1 Crown College International will select International Education Agents on the basis of their overall experience and understanding of the National Code and ESOS Act.

4.5.2 Whenever Crown College International is approached by an Agent to provide student recruitment services, the agent will be asked to complete and sign the International Agent Application Form. This form will request information that includes, but is not limited to:

- i. Business/company details
- ii. Name of primary contact person
- iii. All contacts details including website, telephone, fax and email
- iv. Primary countries of operation
- v. Membership of Professional Associations
- vi. References

4.5.3 On receiving an application the Sales and Marketing Officer will establish an Agents File and will verify all details are correct and undertake the reference checks.

4.5.4 International Education Agents making application to Crown College International must provide a minimum of three (3) Referees. In the event the International Education Agent cannot supply this, then Crown College International will make a professional judgement on the validity of the International Education Agent's application.

4.5.5 If all outcomes of the checks are positive the Agent will be offered a contract.

4.6 Agent Agreements (Standard 4.1)

4.6.1 Crown College International will enter into a written agreement with each International Education Agent it engages.

4.6.2 The agreement will specify the roles and responsibilities of both parties and will regularly review the performance of the International Education Agent, including where corrective action may be required and conditions under which the agreement may be terminated.

4.6.3 Crown College International will monitor the performance of International Education Agents through the following means:

- i. regular review of the international Agent website for accuracy and currency of information relating to Crown College International
- ii. regular provision and restocking of Crown College International marketing material
- i. ongoing and consistent contact with International Education Agents via telephone and email and through the CRM Salesforce

- 4.6.4 The Sales and Marketing Officer will be responsible for organising training and support for Agents at a time suitable for both parties. This training and support will include but not limited to:
- i. ensuring the Agent understands all areas of the International Education Agent Agreement;
 - ii. promotional/marketing materials
 - iii. overview of student Orientation program
 - iv. Crown College International resources and facilities
 - v. regular training of agency employee/s of regulatory requirement including ESOS Act and National Code 2007 requirements
- 4.6.5 The Sales and Marketing Officer will ensure that all Agents have up-to-date, appropriate and sufficient marketing materials necessary to conduct promotion and recruitment services that reflect the high standards of Crown College International, the ESOS Act and National Code 2007.
- 4.6.6 Crown College International will regularly review the agreements it has in place to ensure they are compliant with the National Code 2007, Standard 4.3. Crown College International will not accept students from an International Education Agent or enter into an agreement with an International Education Agent if it knows or reasonably suspects the International 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);
 - i. Facilitating the enrolment of a student who the International Education Agent believes will not comply with the conditions of their student visa;
 - ii. Using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than a bona fide student;
 - iii. Providing immigration advice when not authorised under the Migration Act 1958 to do so.

4.7 Communication

- 4.7.1 Crown College International considers an ongoing and open communication with Agents as a critical part of the successful relationship between both parties. The Sales and Marketing Officer is responsible for such communication and will take every opportunity both in Australia and overseas, to ensure that there is regular and ongoing communication with all contracted Agents.
- 4.7.2 All communications with agents by the Sales and Marketing Officer will be logged in Salesforce and maintained on the Agent's File.
- 4.7.3 Communication channels with Agents will include but not limited to:
- i. Face-to-face contact (in person or electronically)
 - ii. Salesforce (CRM)
 - iii. Telephone
 - iv. Email
 - v. Facsimile
 - vi. All other forms of electronic communication

4.8 Performance Review

- 4.8.1 Agent contracts will be reviewed annually from commencement dates by the Sales and Marketing Officer who will prepare a report on the performance of the agent and agency.
- 4.8.2 The report will be based on analysis of information in the Agent's File and international student survey results. The report will include, but not limited to:
- i. Number of students provided by the agent
 - ii. Number of students provided by the agent who have had to be reported to the Department of Immigration and Border Protection (DIBP)
 - iii. Analysis of student satisfaction of agent services
 - iv. Comment on responsiveness of agents to communications with the Sales and Marketing Officer
 - v. Crown College Performance Review Assessment form
- 4.8.3 On the basis of this report the Group Manager – Operations, General Manager and the Chair of the Internationalisation Committee will make the decision to extend or terminate the Agent's Contract with Crown College International.

4.8.4 If the decision is made to extend the Agent's Contract a new agreement will be signed and the Sales and Marketing Officer will ensure that all agent details held on file are accurate and up-to-date.

4.9 Termination of International Agency Agreements (Standard 4.4)

4.9.1 Where Crown College International has entered into an agreement with an International Education Agent and subsequently becomes aware of, or reasonably suspects, the engagement by that International Education Agent, or an employee or sub-contractor of that agent, of the conduct set out above, Crown College International will terminate the agreement with the International Education Agent.

4.9.2 If Crown College International knows or suspects an employee of the agent is engaged in the activities mentioned in Standard 4.3, Crown College International should report the employee to the International Education Agent (agency). The Education Agent may investigate the complaint and possibly terminate the employee's contract. Crown College International may choose to terminate its agreement with the International Education Agent, depending on the terms of the agreement.

4.9.3 This would not normally apply where an individual employee or sub-contractor of the International Education Agent was responsible for the conduct set out above and the International Education Agent has terminated the relationship with that individual employee or sub-contractor.

4.10 Preventative and Corrective measures to be taken by Crown College International (Standard 4.5)

4.10.1 As a matter of policy, Crown College International will take immediate corrective and/or preventative action upon becoming aware of an International Education Agent 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 provision.

4.10.2 Preventative action could include training sessions for agents and ensuring they have all the material they need to represent Crown College International accurately and professionally.

4.10.3 Corrective action may include providing additional information/material or targeted training in, for example, the expectations of Crown College International.

4.10.4 Corrective action may also include termination of the agreement with the education agent.

4.11 International Marketing Materials (Standard 4.2)

- 4.11.1 Crown College International marketing materials will be developed and reviewed using the Marketing Material Checklist, to ensure it meets Crown College International's quality guidelines.
- 4.11.2 All Marketing Material Checklists will be logged in the International Marketing Materials Register, along with samples of the materials, in order to track and review effective marketing strategies.
- 4.11.3 New and revised International Marketing Materials will be forwarded to ALL International Education Agents, to ensure that Crown College International's materials are up to date and do not mislead potential international students about Crown College International's courses and services.

4.12 Student Surveys

- 4.12.1 During student orientation, each student will be asked to complete a survey relating to the performance of their Agent.
- 4.12.2 The collected survey responses will be reviewed by the Sales and Marketing Officer.
- 4.12.3 Any responses or comments from students on the surveys that indicate failure to provide agreed information or level of service, or where the student has expressed dissatisfaction with the assistance of the Agent will be followed up with the student in the first instance and then with the Agent.
- 4.12.4 Such responses and follow up actions will be recorded in Salesforce and on the Agent's File.

International Education Agent - Engagement Application Process

Expression of interest (EOI) can be demonstrated by an International Education Agent or Crown College International. ↓
All Application and Agreement procedures must be applied regardless of personal relationships between the two parties (if any). ↓
Initial contact with the Sales and Marketing Officer will be discuss, business introductions, purposes and operations, previous student recruitment and services, education, training, and professional associations allowing the Sales and Marketing Officer to collect initial information about the International Education Agent prior to offering an International Education Agent Application. ↓
If an International Education Agent Application is provided the application will be assessed for International Education Agent suitability to provide Crown College International with recruitment services for international students based on, but not limited to: <ul style="list-style-type: none">• The International Education Agent’s current business operations, purpose of business and business provisions• Detailed international student services provision• Primary countries of operation• Membership of professional bodies and nationally recognised associations• Provision of three (3) referees, one of which must be a student• A signed declaration from the International Education Agent stating they are free from any convictions or engaging in dishonest, deceptive, or unethical practices ↓
The Sales and Marketing Officer will be responsible for checking all received information and will as a minimum: <ul style="list-style-type: none">• Confirm all the International Education Agent’s details – website, phone numbers, email etc.• Confirmation of advised memberships to professional bodies and national association• Contact of the three (3) referees, one of which must be a student ↓
If any outcomes of these checks are incorrect or unfavourable, then the Sales and Marketing Officer will take no further action to process the International Education Agent’s application and will advise that Crown College International will NOT be engaging then to provide recruitment services for international students ↓

5. Related Documents

Marketing Policy – International
International Education Agent Agreement
International Education Agent Code of Ethics

6. Policy Publication

All policies and procedures that are applicable to prospective students and enrolled students (domestic or international) and all relevant organisation employees/contractors are made available on request at all times, and form part of the induction and orientation for employees/contractors and students and are made available via the website (where appropriate), student administration/management systems, learning management system and internal electronic systems.

7. Definitions

Agent Agreement – the written agreement between Crown College International and the agent including all relevant schedules.

CRICOS – the Commonwealth Register of Institutions and Courses for Overseas Students. Only CRICOS courses can be offered to International Students studying in Australia on a student visa.

ESOS Act – (Legislative Framework) - The Education Services for Overseas Students Act 2000, or ESOS Act, establishes legislative requirements and standards for the quality assurance of education and training institutions offering courses to International Students who are in Australia on a student visa.

National Code of Practice for Providers of Education and Training to Overseas Students 2007 – is the full name of the Code of Practice which is often referred to as the “National Code 2007”.

The National Code is a set of nationally consistent standards that governs the protection of International Students and delivery of courses to those students by providers registered on CRICOS.

Components of the National Code 2007 - The National Code 2007 is divided into four parts:

Part A includes a description of its role in the ESOS legislative framework and its purpose and objectives;

Part B outlines the roles and responsibilities of the Australian and State and Territory governments which share the responsibility for implementing the Code;

Part C outlines the CRICOS registration process including providers’ requirements and obligations;

Part D provides 15 standards that providers must meet in their interactions with International Students;

Prospective Student – any person who intends to become, or who has taken any steps towards becoming an ‘overseas student’ or ‘intending overseas student’ as defined by the ESOS Act;

Student - a person who holds an Australian Student Visa and is an “overseas student’ as defined by the ESOS Act.

8. Amendment Schedule

Table detailing any amendment made to the policy between review dates:

Date	Modification	Version	By

Document ID	RTOPRO030	Version No 1.0	Controlled copy, uncontrolled when printed
Release Date	Jan 2017	G:\HR\TRAINING\4. CROWN COLLEGE - INTERNATIONAL\POLICIES & PROCEDURES\Final\RTOPRO030 International Education Agents Policy.docx	