

Policy Number: 19

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### **Education Agent Policy**

### Purpose

The purpose of this policy is to provide guidelines to all staff responsible for any matters or procedures relating to education agents within their area of responsibility as employees of Greenwich English College Pty Ltd.

## Scope

This policy covers all staff involved with the initiation, negotiation, and maintenance of working relationships with and the contracting of education agents, particularly staff involved in managing agent relationships and communications and those involved in processes of admissions and receipt of payments.

The General Manager has overall responsibility for the management of how Greenwich English College Pty Ltd will enter into agreements with, and how its employees will interact with, education agencies.

# Policy

In all dealings with education agencies, Greenwich English College Pty Ltd will ensure an ethical and honest approach is followed in the recruitment and enrolment of students to its courses and that all involvement of education agents will be in line with this policy and with all aspects of the relevant legislation and regulations, including Standard 4 of the National Code 2018, the ELICOS National Standards, and the Standards for RTOs 2015.

Greenwich English College Pty Ltd is dedicated to working with education agents in a positive and honest manner to ensure that international students' experience of education in Australia is positive in all relevant respects.

Greenwich English College Pty Ltd will take all reasonable measures to use education agents that have an appropriate knowledge and understanding of the Australian international education industry and its legislative and regulatory framework and whose activities and communications are honest, accurate and lawful.

Greenwich English College Pty Ltd will enter into a written agreement with each education agent which recruits students on its behalf and enter and maintain the education agent's details in PRISMS. Greenwich English College Pty Ltd requires any new agent to complete a written application which includes the provision of at least two references from other CRICOS registered providers.

The written agreement will specify the responsibilities of the education agent and Greenwich English College Pty Ltd and the need to comply with all relevant legislative and regulatory requirements. The agreement will also address monitoring and terminating of the agreement where such requirements are not met.

The written agreement will include:

- Greenwich English College Pty Ltd'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 Greenwich English College Pty Ltd;
- Greenwich English College Pty Ltd's processes for monitoring the education agent's activities and ensuring that education agent gives overseas students accurate and up-to-date information;
- The corrective actions that may be taken and the grounds for termination of the written agreement with the education agent; and
- Circumstances which information about Greenwich English College Pty Ltd may be shared by Greenwich English College Pty Ltd and Commonwealth or state and territory agencies.

Greenwich English College Pty Ltd will ensure that all agents it works with have access to up to date and accurate information relating to courses, services, fees and conditions and that these are accurately used in the agents' marketing of Greenwich English College Pty Ltd products and services to potential students. All agents' providing information to students will ensure that course information is provided before enrolment or commencement of training (whichever comes first) and ensure that the training product is suitable and appropriate for the student learning needs.

Greenwich English College Pty Ltd will not work with an education agent or enter into an agreement with an education agent if it knows or reasonably suspects the education agent to be engaged in dishonest practices, facilitating the enrolment of a student which does not comply with the conditions of the student's visa or other inappropriate or unlawful activities. Where Greenwich English College Pty Ltd has reasons to suspect an education agent to be engaged in dishonest practices, facilitating the enrolment of a student which does not comply with the conditions of the student's visa or other inappropriate or unlawful activities, it will investigate the situation immediately and if the concerns are substantiated it will move to terminate the contract as per the details of the procedure associated with this policy and as per the terms of the contract between the college and agent.

Greenwich English College Pty Ltd will ensure:

- education agents will act ethically, honestly and in the best interest of overseas students, this includes declaration and take all reasonable steps to avoid conflict of interest with its duties as an education agent of Greenwich English College Pty Ltd
- education agents observe appropriate levels of confidentiality and transparency in dealing with overseas students while acting honestly and in good faith.
- education agents must have appropriate knowledge and understanding of the overseas education system in Australia, including the Australian International Education and Training Agent Code of Ethics (2018) in which education agents must adhere to.

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#### Authorising Officer:\_

Date:\_\_\_\_

\_ Review Date:\_

This policy is to be reviewed twelve (12) months from this date.

Greenwich English College Pty Ltd will take immediate corrective action when made aware or believe the education agent or its employee or subcontractor, have not complied with the education agent's responsibilities under Standard 4. If Greenwich English College Pty Ltd becomes aware, or has reason to believe that an education agent is engaging in false or misleading recruitment practices, Greenwich English College Pty Ltd will immediately terminate its relationship with the agent. If the false or misleading recruitment practise were engaged in by an employee or subcontractor of the education agent, Greenwich English College Pty Ltd will require the education agent to terminate its relationship with those individuals.

Greenwich English College Pty Ltd will not accept students from education agents if Greenwich English College Pty Ltd believe the education agent is engaging in unethical recruitment practices including unauthorised migration advice to overseas students.

Greenwich English College Pty Ltd will not accept overseas students from education agents that engage in, or have previously engaged in, dishonest recruitment practise. This includes education agents knowingly recruiting an overseas student in conflict with Greenwich English College Pty Ltd obligations under Standard 7 of the National Code 2018 (Overseas Student Transfers).

Greenwich English College Pty Ltd will not accept overseas students from education agents if Greenwich English College Pty Ltd believe the education agent is creating Confirmation of Enrolments (CoEs) in PRISMS for non bona fide overseas students or facilitating the enrolment of overseas students while knowing that the overseas student will not comply with the conditions of their visa.

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Authorising Officer:

Date:\_

Review Date:\_\_

This policy is to be reviewed twelve (12) months from this date.