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## Education Agent Procedure

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### Procedure

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#### Applications and new agents:

On receipt of all applications for enrolment, the Greenwich English College Pty Ltd Admissions team will ascertain if an agent was involved in the application and check that any such agent is a registered agent of Greenwich English College Pty Ltd by checking in the Student Management System – STARS.

Where an agent has been involved and that agent is not yet a registered agent of Greenwich English College Pty Ltd the admissions officer involved will forward the application to the relevant marketing manager. The marketing manager will then contact the agent to discuss the possibility of the agent becoming a registered agent of Greenwich English College Pty Ltd.

The agent will be directed to complete the Agent Application Form. This includes supplying two references of CRICOS registered providers that the applying agent already works with. The form will be reviewed by the relevant Marketing Manager and the references contacted. The marketing manager will question the references on the quality of the agent's support of the students, their adherence to regulatory and legislative requirements and the quality of the students they recruit.

Where the references are positive the Marketing Manager will the contact and meeting with the agent to discuss their application further. Where the references are not positive and the marketing manager believes that the agent will not support Greenwich English College Pty Ltd in upholding its policies on marketing and engagement with students, the application will be rejected and the applying agent informed.

If the agency is new and no references from other CRICOS registered providers are possible, the relevant marketing manager will make sufficient enquiries to ensure appropriate and reliable information is available to make an effective decision on the application as per the steps set out below. As an absolute minimum, the agent must have a website and an office as well as the areas covered below.

For an agent to be accepted the marketing manager needs to be satisfied, through reference, background check and face to face discussion that the applying agent:

- has an appropriate level of knowledge and understanding of the Australian international education industry and its legislative and regulatory framework
- has the intention to adhere to all legislative and regulatory requirements relevant –

such as those set out in the ESOS Act, the National Code 2018, The Standards for RTOs 2015 and the National ELICOS Standards 2018.

- Carries out all activities and communications in a manner which is honest, accurate and lawful
- Has the intention and capacity to provide high quality service to students both prior to and during the students' enrolments
- Has a strong awareness of and care for needs of students.

Having completed the above process successfully the agent will become a registered agent of Greenwich English College Pty Ltd via the procedure set out below.

**NOTE:**

Greenwich English College Pty Ltd will not accept students from a student recruitment agent or enter into an agreement with a student recruitment agent if it knows or reasonably suspects the student recruitment agent to be:

- Engaged in dishonest practices, including the deliberate attempt to recruit a student where it clearly conflicts with the obligations of registered providers under Standard 7 (Transfer between registered providers).
- Facilitating the enrolment of a student who the student recruitment agent believes will not comply with the conditions of his or her visa
- Providing immigration advice where not authorised under the *Migration Act 1958* to do so.

**Registering agents**

On successful completion of an agent application process the follow steps will be taken by the marketing manager involved:

1. Populate an agent agreement template with the details of the agent, including :
  - its location
  - the specific courses the agent can recruit students into
  - the behaviours and actions required of the agent, including adherence to the relevant legislative and regulatory requirements - the National ELICOS Standards 2018, the Standards for RTOs 2015, The National Code 2018, including Standards 1

(Marketing Information and practices), 3 (Formalisation of enrolment) and the ESOS legislative requirements.

- the behaviours and actions required of Greenwich English College Pty Ltd, including adherence to the relevant legislative and regulatory requirements - the National ELICOS Standards, the Standards for RTOs 2015, The National Code 2018, including Standards 1 (Marketing Information and practices), 3 (Formalisation of enrolment) and the ESOS legislative requirements.
  - the relevant details regarding payment of fees and invoices
  - Termination conditions, including providing for termination in circumstances outlined in Standard 4.4.
  - Processes for monitoring the activities of the student recruitment agent, including where corrective action may be required, and
2. Have the new agent agreement approved and signed by the General Manager of Greenwich English College Pty Ltd
  3. Forward the signed written agreement to the agent for them to sign and return
  4. Create a record, including the agreement for the agent in the Greenwich English College Pty Ltd computer systems
  5. Create a record for the agent in the Greenwich English College Pty Ltd student management system, including contact details for the agency and its staff
  6. Upload the agreement for the agent in the Greenwich English College Pty LTD student management system, including contact details for the agency and its staff

### **Working with registered agents**

In line with the Advertising and Marketing Policy and Procedures, the Marketing Managers of 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.

Greenwich English College Pty Ltd will monitor the activity of its agents on a regular basis. This will be responsibility of the marketing managers and may include the following:

- regular face-to-face meetings,
- telephone meetings,
- regular reports from agents,
- surveys of students recruited by agents,
- spot checks by providers e.g. to observe agents at work,
- Greenwich English College Pty Ltd internal surveys of agents.

The Marketing Manager ensures that all relevant information is recorded in the Greenwich database and uses the above information to evaluate agent performance, provide feedback to agent and, on discussion with and approval from the General Manager, take appropriate actions as below:

- to renew agent contract
- to decide the next agent performance review
- to advise agents of any actions required, including corrective or preventative actions
- to terminate contract with agent

Greenwich English College Pty Ltd marketing managers must take immediate corrective and preventative action upon becoming aware of a student recruitment agent being negligent, careless or incompetent or being engaged in false, misleading or unethical advertising and recruitment practices that could harm the integrity of Australian education and training. This includes discussing the matter with the General Manager of Greenwich English College Pty Ltd and with the agent itself if appropriate.

Where Greenwich English College Pty Ltd becomes aware of, or reasonably suspects, the engagement by one of its registered student recruitment agents, or an employee or sub-contractor of that agent, of the conduct set out in Standard 4.3 of the National Code (2018), the relevant marketing manager will conduct an immediate investigation and if the suspicions remain or are proven to be valid, they will terminate the agreement with the student recruitment agent. This does not apply where an individual employee or sub-contractor of the student recruitment agent was responsible for the conduct set out in Standard 4.3 and the student recruitment agent has terminated the relationship with that individual employee or sub-contractor. Such conduct includes where the agent is:

- 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.

The steps of this process will include, but are not necessarily limited to:

- obtaining information about the above listed conduct by an agent through a student or other reliable stakeholder
- discussing said conduct with the relevant parties in the agency
- sighting evidence that sustains or denies said allegations of mis-conduct
- receiving assurances and evidence that relationships with any agency staff or sub-contractors involved in said conduct have been terminated
- bringing to the attention of to the agency the clauses within this policy and the signed agreement between Greenwich English College Pty Ltd and the agency which detail the grounds for and manner of termination of the contract

- confirming that, post termination of the above mentioned staff or sub-contractor relationships, all such conduct had ceased and all future conduct would be monitored closely to ensure future compliance with all relevant legislation and regulations
- terminating the contract as per the clause within said contract by communicating to the agency said termination in writing
- dis-activating the agency with the STARS student management system so as to disallow future enrolments via this agency
- removing the agency from the list of contracted agents on the Greenwich English College Pty Ltd website.

Greenwich English College Pty Ltd will list all the agents it has agreements with on its website.

Authorising Officer: \_\_\_\_\_ Date: \_\_\_\_\_ Review Date: \_\_\_\_\_

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