

SC31 Education Agent Policy and Procedures

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Purpose

This policy is to ensure that Batool International Pty Ltd uses education agents that have an appropriate knowledge and understanding of the Australian international education industry and does not use education agents who are dishonest or lack of integrity.

This policy will also ensure that intending students will benefit from the monitoring strategies of Batool International Pty Ltd and from Batool International Pty Ltd 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

DET means Department of Education and Training

National Code means the National Code of Practice for Providers of Education and Training to Overseas Students 2018

Policy

Education Agents

1. Batool International Pty Ltd enters into a written agreement with each education agent it engages to formally represent it and enters and maintains the education agent’s details in PRISMS.
2. The written agreement outlines:
 - the responsibilities of Batool International Pty Ltd, including that Batool International Pty Ltd is responsible at all times for compliance with the ESOS Act and National Code 2018
 - Batool International Pty Ltd requirements of the agent in representing the college as outlined in item 3 below.
 - Batool International Pty Ltd processes for monitoring the activities of the education agent in representing Batool International Pty Ltd, and ensuring the education agent is giving students accurate and up-to-date information on Batool International Pty Ltd services

- the corrective action that may be taken by Batool International Pty Ltd if the education agent does not comply with its obligations under the written agreement including providing for corrective action outlined in item 4 below
 - Batool International Pty Ltd grounds for termination of Batool International Pty Ltd written agreement with the education agent, including providing for termination in the circumstances outlined in 5 below
 - the circumstances under which information about the education agent may be disclosed by Batool International Pty Ltd and the Commonwealth or state or territory agencies.
3. Batool International Pty Ltd requires its education agents to:
- declare in writing and take reasonable steps to avoid conflicts of interests with its duties as an education agent of Batool International Pty Ltd
 - observe appropriate levels of confidentiality and transparency in their 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.
4. Where Batool International Pty Ltd becomes aware, or has reason to believe, that the education agent or an employee or subcontractor of that education agent has not complied with the education agent’s responsibilities under Standards 4.2 and 4.3 of the National Code, Batool International Pty Ltd takes immediate corrective action.
5. Where Batool International Pty Ltd 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, Batool International Pty Ltd immediately terminates its relationship with the education agent, or requires the education agent to terminate its relationship with the employee or subcontractor who engaged in those practices.
6. Batool International Pty Ltd will not accept students from an education agent if it knows or reasonably suspects the education agent to be:
- providing migration advice, 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 Batool International Pty Ltd under Standard 7 (Overseas student transfers) of the National Code
 - 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.

Procedure

1. Process new education agent application

Procedure	Responsibility
<p>A. Provide information to potential education agents</p> <ul style="list-style-type: none"> • Email or post potential education agents with the Education Agent Information Kit and Application Form for completion. • Advise in a covering email or letter that the application process will take 6 – 8 weeks from receipt of the completed form. 	Principal Executive Officer



Procedure	Responsibility
<p>B. Assess application from agent</p> <ul style="list-style-type: none"> 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. Assess application based on the responses from referees, the location that the agent will recruit from, the agent's demonstrated appropriate knowledge and understanding of the international education system in Australia (including the Australian International Education and Training Agent Code of Ethics), and the agent's 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. 	Principal Executive Officer

2. Confirm agreement

Procedure	Responsibility
<p>C. Confirm agreement with new education agent</p> <ul style="list-style-type: none"> 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. Following receipt of signed agreement, send certificate as evidence of registration with Batool International Pty Ltd to be displayed in agents' offices to indicate to prospective students that they have a written agreement with Batool International Pty Ltd. Add approved agents to Batool International Pty Ltd list of approved Education Agents and publish on Batool International Pty Ltd website. 	Principal Executive Officer
<p>D. Renew existing agent agreements</p> <ul style="list-style-type: none"> 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. 	Principal Executive Officer

3. Implement agent agreement

Procedure	Responsibility
<p>E. Induct new agents</p> <ul style="list-style-type: none"> Provide an induction regarding Batool International Pty Ltd course offerings Provide an overview of Batool International Pty Ltd current marketing Discuss student enrolment and selection process Provide approved marketing materials and discuss process for updating any revised marketing materials. Discuss and clarify National Code 2018 requirements and Batool International Pty Ltd 	Principal Executive Officer



Procedure	Responsibility
<p>Education Agent policy, including the following information regarding fees:</p> <ul style="list-style-type: none"> ○ Agents are obliged to handle all course monies with care and in accordance with their fiduciary obligations and the Batool International Pty Ltd <i>Education Agent Code of Conduct</i>. All such monies received must be passed on immediately to Batool International Pty Ltd without set off or deduction. ○ If a student pays the tuition and non-tuition fees required for their enrolment (as described in the <i>Letter of Offer and Student Agreement</i>) to an Agent, Batool International Pty Ltd will not issue the student's Confirmation of Enrolment (CoE) until the Agent has transferred those fees in full to Batool International Pty Ltd ○ If an Agent charges their own fees (in addition to Batool International Pty Ltd tuition and non-tuition fees), those fees remain the responsibility of the Agent. Batool International Pty Ltd is not responsible for the Agent's own fees and does not protect or refund those fees under any circumstances. <ul style="list-style-type: none"> ● Confirm dates for review of Agreement and targets to be achieved 	
<p>F. Provide up-to-date information to agents</p> <ul style="list-style-type: none"> ● Provide up-to-date information to agents through: <ul style="list-style-type: none"> ○ Email newsletters regarding important information for agents. ○ Emails, phone calls, text messages or other informal communications regarding specific student issues ○ Delivering seminars and marketing events with agents when Batool International Pty Ltd representatives are available in the agent's region. ○ Publishing content on Batool International Pty Ltd website and social media profiles 	Principal Executive Officer
<p>G. Monitor education agents</p> <ul style="list-style-type: none"> ● Implement monitoring procedures as per written agreement including: <ul style="list-style-type: none"> ○ Documented face to face meetings and/or teleconferences with agents. ○ Analysis of quality and quantity of applications on behalf of prospective students ○ Analysis of conversion rates from lodging applications to studying at Batool International Pty Ltd ○ 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. ○ Documenting on the agent's file instances where students claim to have been misinformed about their studies at Batool International Pty Ltd ○ 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. 	Principal Executive Officer



Procedure	Responsibility
<ul style="list-style-type: none"> Where an agent is meeting the terms as shown in the written agreement, provide written feedback to agent indicating such. 	
<p>H. Investigate agents who are not meeting the terms of their agreement</p> <ul style="list-style-type: none"> Seek feedback from the agent on the issue. Consider issue and decide on action as follows: <ul style="list-style-type: none"> 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 the Department of Home Affairs and DET. 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. 	<p>Principal Executive Officer</p>

Document Control

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