

<b>Policy Name:</b>	Education Agents
<b>Policy Number:</b>	4-CRICOS-2011
<b>Current Version:</b>	05 – 01/07/2014
<b>Next Revision Date:</b>	July 2015
<b>Purpose:</b>	To ensure that the PGA IGI only engages education agents who are ethical and that can provide a high level of service to international students.
<b>Scope:</b>	Education agents under contract and acting on behalf of the PGA IGI.
<b>Exceptions:</b>	Domestic students
<b>Policy Owner:</b>	Marketing & Student Recruitment Manager
<b>Related policies and legislation:</b>	<ul style="list-style-type: none"> <li>• Education Services for Overseas Students (ESOS) Act 2000 (<a href="https://www.aei.gov.au/ESOS">https://www.aei.gov.au/ESOS</a>)</li> <li>• The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (<a href="https://www.aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Documents/National_Code_2007_pdf.pdf">https://www.aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Documents/National_Code_2007_pdf.pdf</a>)</li> <li>• For further detailed information on the legislative requirements in the National Code 2007, see National Code Explanatory Guide (<a href="https://aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Pages/default.aspx">https://aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Pages/default.aspx</a>)</li> </ul>
<b>Internal procedures guided by this policy:</b>	N/A
<b>Published Location:</b>	Y:\Administration - Compliance/Policy & Procedure - Master File/CRICOS

## Revision History

<b>Revision Date:</b>	<b>Status: (Draft/Final)</b>	<b>Summary of Changes</b>	<b>Prepared/Approved By:</b>	<b>Revision #:</b>
03/02/2011	Draft	Formatting	Institute Coordinator	01
07/04/2011	Final	Formatting	Institute Coordinator	02
18/05/2011	Final	Audit review	Institute Coordinator	03
21/01/2014	Draft	Updated web links and staff titles	Dean & Executive Officer	04
01/07/2014	Final	Updated staff title and government departments. Removed ongoing agent agreements.	Systems Administrator/Dean and Executive Officer	05

## Glossary of Terms/Definitions

<b>CRICOS</b>	Commonwealth Register of Institutions and Courses for Overseas Students
<b>DEEWR</b>	Former Department of Education, Employment and Workplace Relations
<b>DeptEd</b>	Department of Education
<b>DIAC</b>	Former Department of Immigration and Citizenship
<b>DIBP</b>	Department of Immigration and Border Protection
<b>ESOS</b>	Education Service for Overseas Students
<b>PGA IGI</b>	PGA International Golf Institute
<b>PRISMS</b>	Provider Registration and International Students Management System (PRISMS). This site provides Australian education providers with Confirmation of Enrolment (Coe) facilities required for compliance with the Education Services for Overseas Students (ESOS) Legislation.

## Procedure Measures

<b>Procedure Measures</b>	<b>Target</b>
Compliance with National Code - Standard 4	100%

## Distribution

All Directors  
All Staff  
All International Students

## INTRODUCTION

Education agents acting on behalf of the PGA IGI are required to provide a high standard of service and information to overseas students. The PGA IGI will take reasonable measures to use education agents that have an appropriate knowledge and understanding of the Australian international education industry. We do not use education agents who are dishonest or lack integrity, or who have had negative reports issued publically or privately through our due diligence process.

## 1.0 Lines of Responsibility

The Marketing & Student Recruitment Manager under the management of the Dean & Executive Officer of the PGA IGI is responsible for the selection, appointment, monitoring and management of the activities of PGA IGI education agents.

## 2.0 How we Advertise Approved Agents

The PGA IGI has an agent section on its website; this area is easily accessible to site visitors and outlines the following education agent information:

- Agent name
- Agents address
- Contact person/s
- Company name
- Contact details - email and phone

## 3.0 Education Agent Selection

Education agents are engaged to represent the PGA IGI and recruit students for the Institute. A person or organisation wishing to apply to be an approved education agent of the PGA IGI will be provided with an Education Agent Application Form on request. Applicants must complete the form and return it to the PGA IGI. The applicant's suitability is assessed on the basis of the requirements outlined in the National Code, as well as other information required as part of our due diligence process.

**NC Extract** The registered provider must not accept students from an education agent or enter into an agreement with an education agent if it knows or reasonably suspects the education agent to be:

- a. 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);
- b. facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa
- c. using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than bona fide a student; or
- d. providing immigration advice where not authorised under the Migration Act 1958 to do so.

## 4.0 Appointment and Written Agreement

It is mandatory for PGA IGI to have a written agreement with education agents who formally represent the Institute. 'Formally' covers situations where the agent promotes the PGA IGI courses with the intention of recruiting students into the PGA IGI. We are not required to have a formal agreement with an education agent who acts on behalf of an international student or their parent.

When the applicant has been assessed as suitable, the Marketing & Student Recruitment Manager prepares the Education Agent Agreement. The applicant and the PGA IGI sign the Education Agent Agreement. The Agreement specifies responsibilities of each party and the need to comply with the National Code 2007.

A copy of the signed Agreement is retained by the PGA IGI and a copy is held by the Education Agent. The PGA IGI Marketing & Student Recruitment Manager will file a copy of the agreement in the Agents Register and update the agent section of the website with the new agent details. Agents are issued with an agreement which commences upon the commencement date specified in the agreement and remains in force until termination of the agreement by either party, or on the date specified in the agreement. Agents are issued a PGA IGI current Certificate of Approval to act as its agent.

## **5.0 Education Agent Training and Information**

The PGA IGI ensures that education agents have access to up-to-date and accurate marketing information and materials as set out in National Code. Information used for marketing and recruitment purposes will be updated as changes occur. This information and materials will be provided in both hard-copy and softcopy. Where the monitoring of education agents indicates a deficiency or non-compliance with legislation or the National Code, training and/or the provision of additional information in relation to the expectations of PGA IGI will be provided to the agent.

## **6.0 Monitoring Education Agents**

The PGA IGI will take immediate corrective and preventative action if it becomes aware of an 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 Australia's education and training sector.

We will not deal with an education agent who engages in unethical behaviour. The agreement with an education agent includes processes for monitoring the activities of agents and termination conditions. The Marketing & Student Recruitment Manager, under the management of the Dean and Executive Officer, is responsible for the review process. The PGA IGI uses a number of monitoring mechanisms to evaluate the education agent's activities. These may include one or more of the following:

- Visits to education agent's offices;
- Face-to-face meetings where feasible;
- Telephone meetings;
- Documented comments taken when speaking or visiting the agent;
- Regular reports from education agents;
- Formal /informal feedback from students recruited by the agent;
- Surveys of students and/or parents of students recruited by the agents;
- Performance benchmarks against agreement responsibilities;
- Observation of education agents (for example, at education fairs/expos);
- Quality of students (completion rates, number of students reported to DIBP);
- Conversion rates of successful enrolments from letters of offer;
- Recommendations from within the industry;
- Informal feedback from industry colleagues.

The PGA IGI will hold one or more annual reviews of education agents. A review report for each education agent will be submitted to the Dean & Executive Officer for discussion and sign-off. A copy will be sent to the agent to inform them of the review outcomes and document any corrective action required.

## **7.0 Education Agent Change of Details**

The Marketing & Student Recruitment Manager will update education agents contact details through:

- receipt of email advice;
- written confirmation on an official letterhead.

Any change of details will be noted in the Agent Register and up-dated on our website.

## **8.0 Termination of Agreement**

If as a result of an annual review (or at any time during the period of the agreement) it is decided to terminate the education agent agreement, the PGA IGI will give notice to the education agent in accordance with the terms of the agreement. We will terminate the agreement with an agent if the Institute becomes aware of, or reasonably suspects, the behaviour of an agent or an employee or sub-contractor of that agent, is unethical or deceptive. Where an individual employee or sub-contractor of the education agent was responsible for the unethical conduct, and the education agent has terminated the relationship with that individual employee or sub-contractor, termination of the agreement is not required.

## 9.0 Advertising our Agents

The PGA IGI will maintain a list of all persons, whether within or outside Australia, who represent or act on our behalf in dealing with overseas students or intending overseas students. The PGA IGI will publish the list on its website.

We will ensure that:

- A list of agents is available on our website;
- Consistent with Standard 4 of the ESOS National Code 2007, this requirement is taken to mean listing only those education agents with whom the provider has a formal written agreement (as opposed to listing agents who act independently on behalf of a student or parent of a student);
- The online location of this information is readily accessible to students and regulators;
- We include at a minimum the agency name, name of the principal agent, legal entity and street address.

**This policy will be reviewed annually and revision history updated.**