

Draft International Student Education Agent Policy

1. RATIONALE

The International Student Education Agent Policy address the rights and responsibilities of both The Friends' School and Education Agents in relation to Education Agents contracted to represent the School. The International Student Education Agent Policy is inclusive of SV500 Students and addresses all National Code 2018 requirements.

2. SCOPE

This policy includes the following

- 2.1. Principal
- 2.2. Director of Business Affairs
- 2.3. Director of Community Engagement
- 2.4. Enrolments Manager
- 2.5. K-12 International Student Coordinator
- 2.6. International Students
- 2.7. Parents of International Students

3. POLICY

3.1. The Friends' School will engage Education Agents to represent and assist the School with the recruitment of international students, including students who will require a SV500 Visa and students who can study in Australia on another type of temporary visa, as a permanent resident or as a citizen of Australia. Education Agents:

- 3.1.1. will generally be based off- shore and located in countries and cities being targeted by the School for recruitment of students
- 3.1.2. may be based onshore, but will only be engaged for students studying on a Student Visa 500 and where a student has been completed at least 6 months study in their previous principal course of study, and meets the Friends' entry requirements. Such enrolments will be considered by the School if vacancies are available and Friends' are convinced that there are legitimate reasons for the student to change schools, and that the change is being driven by the student and not the Agent.

3.2. The Role of Education Agents

Education Agents will be engaged to assist the School as follows:

- 3.2.1. Promoting The Friends' School and its Courses to prospective students in the countries and regions agreed to by both parties
- 3.2.2. Recruiting and assisting in the recruitment, application and enrolment process of prospective students to study at The Friends School, in line with the School's policies and CRICOS registered courses
- 3.2.3. Provide prospective students with any relevant and necessary information about the School's entry requirements, courses, fees, facilities, boarding accommodation options, pastoral care program, co-curricular program and life in Hobart. This information must be accurate, approved by The Friends' School and comply with the National Code 2018
- 3.2.4. Assist the student to book an AEAS Test, or arrange any other assessment required by the School

- 3.2.5. Assist the student to complete the application form and submit all required and certified documentation
- 3.2.6. Advise the student of their obligation, and that of the agent, to be fully transparent with the School about any matters (academic, health and wellbeing, social, emotional and/or physical) which may impact the student's learning. This includes any matters which may hinder the student's ability to meet satisfactory achievement requirements for their course of study. See *Enrolment Policy, International Student Entry Requirements Policy and SV500 Student Visa Requirements*
- 3.2.7. Assist the student to complete all enrolment documents, if offered a place of enrolment
- 3.2.8. Assist the students to complete and lodge Visa application, if required
- 3.2.9. Maintain contact with the students and parents over the duration of the student's enrolment at The Friends' School, supporting them as necessary with communications with the School about the student's progress and wellbeing.

3.3. Education Agent Approval Process

Prior to engaging an Education Agent, The Friends' School's Enrolments Manager will:

- 3.3.1. Interview the Principal Agent, in-country where possible (or via skype otherwise) to gain an understanding of the Agent's experience in the industry, approach to recruitment, knowledge of international education and the Australian education market, and experience in the Australian Schools market
- 3.3.2. Assess the Agent's online presence
- 3.3.3. Seek and make contact with three referees (CRICOS registered Providers), two of whom should be from the Australian School sector (See *SV500 Procedure Education Agent Selection*)

3.4. Education Agent Agreement

- 3.4.1. All Agents approved to represent The Friends' School must complete and sign the *Education Agent Agreement* before marketing to or recruiting students on behalf of the School. The Agreement will be co-signed by the Enrolments Manager and both parties will retain copies of Agreement
- 3.4.2. The Agent cannot assign this agreement (or part thereof) or subcontract this agent to any third party without the prior consent of The Friends' School

3.5. PRISMS

- 3.5.1. Upon signing the Education Agent Agreement, the School is required to enter and maintain the education agent's details in PRISMS. See *SV500 Procedures: Managing Education Agents*

3.6. Publishing Approved Education Agents

- 3.6.1. Upon receiving the signed Education Agent Agreement and adding the agents details to prisms, the enrolments manager will authorise and arrange for the agents details to be published on the School's website

3.7. Education Agent and Training

- 3.7.1. The School is obliged and committed to providing all education agents with training, enabling them to represent the School accurately. *SV500 Procedure: Managing Education Agents*
- 3.7.2. Where possible, the Enrolments Manager will offer this training to the Principal Education Agent and their education consultants at the offices of the Agent. Where this is not possible, the training will be conducted via skype or a similar App. The initial training will occur within two weeks of the Agent signing the Agent Agreement and prior to the Agent promoting the School or recruiting any students for the School
- 3.7.3. The Enrolments Manager will provide training updates to agents annually
- 3.7.4. All Agents will be provided with updated marketing material as it is published and an update to Fees on an annual basis

3.8. The Expectations and Obligations of Education Agents

Education Agents must:

- 3.8.1. comply with the requirements of the ESOS Act 2000 and Australian National Code of Practice 2018 (National Code 2018) and pay particular attention to Part D Standards 1-4
- 3.8.2. adhere to the [Australian International Education and Training Agent Code of Ethics](#)
- 3.8.3. be informed about and comply with all of The Friends' School policies which apply to International Students, including SV500 Student
- 3.8.4. maintain confidentiality and transparency in all matters concerning the students, while acting honestly and in good faith (See TFS Privacy Policy)
- 3.8.5. act in the best interest of students at all times
- 3.8.6. declare any conflicts of interests when representing students and the School, including but not limited to:
 - charging service fees to both overseas students and registered providers for the same service
 - personal or financial relationships with a prospective student and family (this applies to employees of the agent)
 - financial interest in any third party provider involved in the enrolment of a prospective student at The Friends' School
 - any financial, administrative or supervisory role in any testing or assessments required of the student

3.9. Managing and Monitoring Education Agents

The Enrolments Manager will monitor and review the performance of Education Agents as follows:

- 3.9.1. Update the details of the Education Agent involved in each enrolment via the PRISMS system
- 3.9.2. A regular review of the Agent's performance, to be undertaken at least every six months at the discretion of The Friends' School including a record of inquiries and outcomes
- 3.9.3. Checks to be undertaken by representatives from Friends' at the agent's premises and at promotional events. These checks will include the requirement for the Agent to be using current promotional material

- 3.9.4. A survey of parents of students, and students recruited by the Agent will be conducted annually
- 3.9.5. See (*SV500 Procedure: Managing Education Agents*)

3.10. Corrective Action

- 3.10.1. If at any point the School suspects that a contracted Educated Agent:
- Is negligent, careless or incompetent
 - has knowingly withheld vital information from the School, which may impact the student's ability to meet their course requirements
 - has engaged in false, misleading or unethical advertising, or recruitment practices
 - has provided migration advice, unless the Education Agent is authorised to do so under the Migration Act
 - facilitated the enrolment of a student, whom the Education Agent suspects or believes will not comply with the conditions of his or her visa
 - deliberately attempted to recruit a student where this clearly conflicts with the School's *SV500 Student Transfer Policy* and the obligations of registered providers under Standard 7 of the National Code 2018.
 - initiates and actively encourages students to leave The Friends' School in Year 11 or 12, where such a move is being driven by the Agent seeking an extra commission and not the best interests of the student. Such cases may include encouraging the student, who is otherwise happy and settled at TFS, to enrol in a non-school sector course prior to the student completing Year 12, and where there is clear evidence that the student will successfully complete Year 12 at TFS and gain an ATAR that will enable the student entry to a wide range of Higher Education Courses.

the school reserves the right to terminate the Agent Agreement immediately.

- 3.10.2. Alternatively, the School may decide, at the discretion of the Principal, to engage in corrective action with the Agent. Corrective action may include but is not limited to:
- On-shore training for the Agent
 - Requiring the Agent to complete the AEI on-line Agent training Course

3.11. Reporting Agents In the case that an Agent has breached the terms of the Education Agent Agreement, engaged in unethical recruitment practices, and is not complying with the National Code the School will terminate the Education Agent Agreement and report the termination of the Agent via PRISMS. See *SV500 Procedure: Terminating Agent Agreement and Reporting Agents*

3.12. Agent Fees

- 3.12.1. The Friends' School will pay Education Agents a commission for the recruitment of each new student. The commission rate and conditions will be recommended by the Enrolment Manager, and decided by the Principal on an annual basis.
- 3.12.2. The Education Agent Agreement will specify the commission to be paid for the successful enrolment of each student and the conditions of payment.

4. **LEGAL AND OTHER REQUIREMENTS**
 - 4.1. ESOS Act 2000
 - 4.2. National Code 2018
 - 4.3. National Code 2018 Factsheets
 - 4.4. [Australian International Education and Training Agent Code of Ethics](#)
 - 4.5. Australian Consumer Law

5. **ASSOCIATED POLICIES, PROCEDURES, GUIDELINES AND FORMS**
 - ❖ **Education Agent Agreement**
 - ❖ **SV500 Procedure: Managing Education Agents**
 - ❖ **SV500 Procedure: Selecting Education Agents**
 - ❖ Critical Incident Management Policy
 - ❖ Domestic Fees Policy/Schedule
 - ❖ Enrolments Policy
 - ❖ International Student Fee Policy/Schedule
 - ❖ Marketing Policy
 - ❖ Privacy Policy
 - ❖ International Student Accommodation Policy
 - ❖ International Student Entry Requirements Policy
 - ❖ International Student Health Management Policy
 - ❖ International Student Support Services Policy
 - ❖ International Student Welfare Policy
 - ❖ SV500 Complaints and Internal Appeals Policy
 - ❖ SV500 Course Progress Policy
 - ❖ SV500 Deferring, Suspending or Cancelling Enrolment Policy
 - ❖ SV500 External Appeals Policy
 - ❖ SV500 Fee Policy/Schedule
 - ❖ SV500 Formal Offer and Acceptance Policy
 - ❖ SV500 Refund Policy
 - ❖ SV500 Student Transfer Policy
 - ❖ SV500 Student Visa Requirements Policy