



RTO No. 31736 | CRICOS Provider No. 03010G

Education Agents Policy

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1. Purpose

The purpose of this policy is to ensure that Queensford College appoints and monitors education agents and their activities to uphold the reputation and integrity of Australian education in accordance with SRTOs 2015 and the National Code 2018.

2. Scope

This policy applies to marketing and other relevant staff at Queensford College, all current and aspiring education agents and third parties who have partnership with college for student recruitment services.

3. Responsibility

The Head of International Student Recruitment and Admissions is responsible for the implementation of this policy which includes policy review, communication with education agents and other relevant stakeholder and monitoring the policy.

4. Compliance/legislation

Clause/standard	Requirement
standard 4 of the National Code 2018	Education Agents
Standard 2.3 of SRTOs 2015	The RTO ensures that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.
Standard 2.4 of SRTOs 2015	The RTO has sufficient strategies and resources to systematically monitor any services delivered on its behalf and uses these to ensure that the services delivered comply with these Standards at all times.

5. Definition

Education Agent	An accredited person or organisation with the authority to promote Queensford College's programs and services to students or intending students in nominated regions
Agent Agreement	The agreement between Queensford College and the agent including the schedules.

CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students. All courses and Education Providers have a designated CRICOS Code
ESOS Act	Education Services for Overseas Students Act 2000 of the Commonwealth of Australia
ESOS Regulations	Education Services for Overseas Students Act 2000 of the Commonwealth of Australia
National Code	National Code of Practice 2018 for Registration Authorities and Providers of Education and Training to Overseas Students
Prospective Student	A person who intends to become, or who has taken any steps towards becoming, a student, an 'overseas student' or 'intending overseas student' as defined by the ESOS Act
Prospective Agent	An accredited person or organization who wishes to have the authority to promote Queensford College programs and services to students or intending students in nominated regions
Student	A person who holds an Australian Student Visa and is an 'overseas student' as defined by the ESOS Act
Relevant Legislation	The ESOS Act 2000 (Cth); The ESOS Regulations 2001 (Cth); The Migration Act 1958 (Cth); The Migration Regulations 1994 (Cth); The National Code 2018; and Any other legislation or regulations relevant to governing the provision of education to overseas students in Australia

1. Policy

1.1 Queensford College requires every education agent to go through a comprehensive process prior to recruiting students. This includes Agent Application Form, Reference check, Approval and Agent Agreement signing. Please see Annex-1 for the step by step process.

1.2 Queensford College usually appoint agents whose company is registered in the relevant country, state or province and if relevant in Australia.

- 1.3 Queensford College will not enter into an agreement with any Education Agent or potential Education Agent if it knows or reasonably suspects the Education Agent to be:
- i. 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);
 - ii. facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa;
 - iii. using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than bona fide a student; or
 - iv. providing immigration advice where not authorized under the Migration Act 1958 to do so.
- 1.4 Queensford College will support education agents with up to date industry knowledge and marketing materials relevant to the approved courses via College website and/or direct email links/face to face visits and/or presentations.
- 1.5 Queensford College requires its agents to have an appropriate knowledge and understanding of the Australian International Education Industry and in particular below:
- Education Services for Overseas Students Act 2000:
 - Education Services for Overseas Students Amendment Act 2014:
 - The National Code of Practice for Providers of Education and Training to Overseas Students 2018
 - Providers of Education and Education Services for Overseas Students Act 2000 (ESOS Act)
 - The Australian Government Department of Home Affairs
 - Agents Gateway
 - Australian Skills Quality Authority information
- 1.6 Queensford College requires its education agents act honestly, ethically and appropriately.
- 1.7 Queensford College will conduct monitoring and reviews of the performance of approved education agents.
- 1.8 Queensford College may terminate an agent's appointment where it knows or has a reasonable suspicion that an agent may have been engaged in unprofessional conduct and has breached any contractual agreement mentioned in the Agent Agreement.

1.9 Queensford College requires all agents to inform the College in writing of any subcontracts who will be promoting Queensford College. It is the primary agent's responsibility to ensure that the sub-agents are not involved in any deceptive or misleading advertisements about Queensford College or its courses. Details pertaining to termination are set out in the Agent Agreement.

1.10 Queensford College will update the approved list of education agents on the college website and its database system and report to the regulatory agencies (ASQA and PRISMS) as required by compliance.

2. Procedure

2.1. Agent Application

- (i) Education agents intending to affiliate with Queensford College first complete an Education Agent Training Course and submit an Agent Application Form along company profile, copy of the registration of company or business and 2 referees.
- (ii) For newly established Agents unable to provide references, the application will be reviewed by Queensford College's Head of International. Given the agent's application is successful, the college will provide training and monitor agent activities closely.

2.2. Agent Agreement

Once the application is approved, the College will offer a signed Agent Agreement with a given period of time. Upon expiry of the Agent Agreement, the College will determine whether or not to renew the agreement based on the monitoring and review report.

2.3. Marketing and Advertising

- All Education Agents receive and promote only approved marketing materials sent by the college,
- Education agents are allowed to recruit their sales personnel and employ different sales activities/strategies (digital, campaign etc.),
- A Marketing Request Form is to be completed by the agents intending to promote Queensford College and its courses by using College logo, website link or course descriptions. All relevant sections of the form must be completed and sent to Queensford College for approval.

2.4. Monitoring and Review

2.4.1 Queensford College conducts half yearly monitoring (every 6 months) of the performance of the education agents. Those agents who have recruited/enrolled students during the duration of the agreement, will be reviewed on an ongoing basis based on one or many of the following:

2.4.1.1 Number of student enquiries received from the agent

- 2.4.1.2 Number of students enrolling from the agent
- 2.4.1.3 Student study outcomes (e.g. course completion rates, visa compliance)
- 2.4.1.4 Department of Home Affairs data, in relation to visa grant / refusal rates; (this is subject the market circumstances).
- 2.4.1.5 Student feedback
- 2.4.1.6 New students who have come through the Queensford College agent are asked to complete the Education Agent Feedback Form, included in student orientation packs. This form provides direct feedback concerning students' opinions and experiences with their agents.
- 2.4.1.7 From this feedback, Queensford College is able to collate and analyse areas where agents could improve and also provides an assessment of their services and performance on a routine basis.

3. Associated documents

- Agent Application Form
- Agent Agreement
- Marketing Request Form
- Student Agent Feedback Form
- Agent Monitoring Report template
- Agent Reference Check

Annex-1 Agent Appointment Process

	Steps	Who is responsible?	Comments
1.	Approved Agent Application Form sent to prospective agent	Marketing and Admin Staff	
2.	Completed form with documentation required attached and returned to Queensford College	Prospective Agent	<p>Checklist:</p> <ul style="list-style-type: none"> • Completed agent application. • Company profile • Business registration certificate • PIER qualifications • Other related documents
3.	If determined to be suitable to appoint, contact referees for completion of Agent Reference Check	Marketing and Admin Staff	<p>Contact the referees and forward them the “Agent Reference Check” form. Must receive a minimum of one referee in order to appoint (where provided)</p> <p>In case Agent is entirely new, and unable to provide references, appoint the agent with permission of the Head of International, train and monitor closely.</p>
4.	Once Agent Reference Check has been completed, reassess to determine if suitable to appoint	Marketing and Admin Staff	
5.	Details of Agent updated on Queensford database	Marketing and Admin Staff	
6.	Prepare the Agent Agreement	Marketing and Admin Staff (Signed and dated)	Send a copy to the agent's designated email address.
7.	Agent returns signed copy of the agreement	Prospective Agent	Queensford staff will then file the copy under the Agent Record
8.	Prepare a list to Update: PRISMS/ASQAnet/Website	Marketing and Admin Staff	List to be provided to the Content and Social Media Manager on a fortnightly basis – to be updated on PRISMS, ASQAnet and Queensford website