



RTO 31736 | CRICOS 03010G

Education Agents Policy

BRISBANE

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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 the Standards for RTOs 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	Registered providers must ensure that their education agents act ethically, honestly and in the best interests of overseas students, and uphold the reputation of Australia's international education sector.
Clause 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.
Clause 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	<ul style="list-style-type: none"> • 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.
PRISMS	The provider registration and International Students Management Systems.
Course Fee	The tuition and other fees set by Queensford College for the Courses.
Courses	The full-time registered courses offered by Queensford College and registered on CRICOS.

6. Policy

- 6.1. Queensford College ensures that its education agents act ethically, honestly, and in the best interest of overseas students.
- 6.2. Queensford College requires every education agent to go through a comprehensive process prior to recruiting students. This includes completion of the Agent Application Form, Reference check, Approval and Agent Agreement signing.
- 6.3. Queensford College usually appoint agents whose company is registered in the relevant country, state or province and if relevant in Australia.
- 6.4. Queensford College maintains an accurate and current list of its approved list of education agents on the college website and on its internal database system, and reports education agent details to the regulatory agencies (ASQA and PRISMS) in accordance with compliance requirements.

Written Agreement

- 6.5. Queensford College enters into a formal written agreement with each education it engages to formally represent the College. The written agreement outlines the obligations and requirements in accordance with the ESOS Act and National Code 2018.
- 6.6. Queensford College requires its agents to:
 - a) Declare in writing and take reasonable steps to avoid conflicts of interests with its duties as an education agent of the college
 - b) Observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students
- 6.7. 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:

- 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 authorized under the Migration Act 1958 to do so.

Support and Monitoring:

6.8. 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

6.9. 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.

6.10. Queensford College will conduct ongoing monitoring and performance reviews of its approved education agents. Monitoring activities are designed to ensure that Queensford College is using reputable agents and may include but are not limited to:

- Collecting and reviewing student feedback regarding Agent practices
- In-House analysis of agent performance
- Ongoing and consistent contact with agents via telephone and email
- Regular training of agency staff of regulatory requirements including ESOS and National Code requirements, and product knowledge updates.
- Regular provision of Queensford College promotional material
- Analysis of student study outcomes (e.g. course completion rates, visa compliance)
- Review of Department of Home Affairs data, in relation to visa grant /refusal rates.

6.11. Queensford College utilises the outcome of its monitoring activities to inform part of its agent agreement renewal process.

6.12. All information related to Agent monitoring will be documented under the agents record.

Corrective Actions and Termination

6.13. 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*.

6.14. 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*.

7. Procedure to Agent Application

7.1. Before completing an application to represent Queensford College, agents should be familiar with the following:

- 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 and Providers of Education and Education Services for Overseas Students Act 2000 (ESOS Act)
- The Australian Government Department of Home Affairs
- Australian Skills Quality Authority: <https://www.asqa.gov.au/>
- Please refer to CRICOS information: <https://cricos.education.gov.au/Institution/InstitutionSearch.aspx>

7.2. It is recommended that agents complete an Education Agent Training course.

7.3. International Education agents willing to represent Queensford College are required to submit an Agent Application available on our website along with profile of their company, copy of registration of company or business. All Agents are required to nominate and include details of two referees.

7.4. Once the application and all documents are received, the officer in charge will check references and if successful, will generate an *Agent Agreement* for the Agent Company and forward it to the agent for signature.

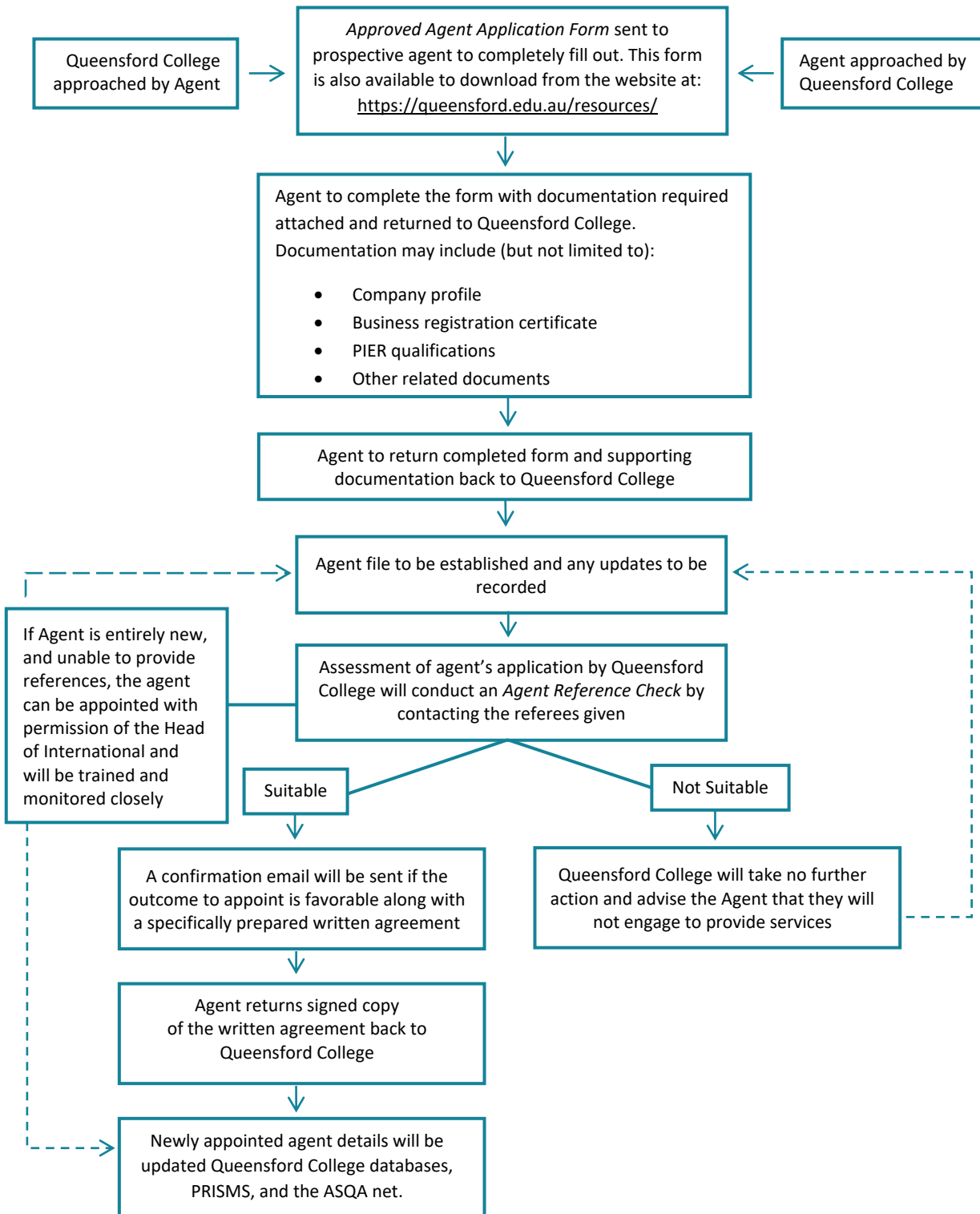
7.5. In case of a newly established Agent who are unable to provide references; Queensford College's Head of International will review the application and upon successful appointment, the College will provide training and monitor their activities closely.

Checklist:

- Completed agent application
- Company profile
- Business registration certificate
- PIER qualifications
- Other related documents

7.6. The commission details will be included on the *Agent Agreement*. Once the agent signs and forwards Queensford College a copy of signed agreement, a *Certificate of Appointment* will be issued. Agent Agreements by default are issued for a given period of time. Upon expiry of the Agent Agreements, the agents can apply for renewal of the same.

8. Agent Appointment Application Process



9. Procedure to Manage and Monitor the performance of the Education Agent

9.1. Queensford College monitors the performance of its approved agents in an ongoing way by numerous methods, which may include not restricting to the below:

- Student feedback
- In-House analysis of agent performance
- Ongoing and Consistent contact with agents via telephone and email
- Regular training of agency staff of regulatory requirements including ESOS and National Code requirements, and product knowledge updates
- Regular provision of Queensford College promotional material
- Student study outcomes (e.g. course completion rates, visa compliance)
- Department of Home Affairs data, in relation to visa grant / refusal rates

9.2. The monitoring procedure is designed to ensure that Queensford College is using reputable agents. The outcome of any monitoring will form part of the input to the agent agreement renewal. All information related to monitoring will be recorded under the agents record.

9.3. Queensford College will maintain a register of its appointed agents and will also publish an up-to-date list of agents on PRISMS, ASQAnet and on Queensford College's website.

9.4. All agency agreements will be subject to review towards the end of the duration of the agreement.

9.5. The Associate Director will develop a schedule for the review of agency agreements.

- a) For all agreements due to renew, the review decision will be based on the review outcome/results.
- b) For ongoing agreements, the date of review will generally coincide with the anniversary date.

9.6. For the purposes of the review Agents will be divided into 2 groups:

- a) Those agents who have not recruited/enrolled students during the duration of the agreement.
- b) Those agents who have recruited/enrolled students during the duration of the agreement.

9.7. Agents who have not recruited/enrolled any students with Queensford College, will:

- a) Automatically become inactive if the agreement is due to expire, it will not be renewed.
- b) Be removed from PRISMS, ASQAnet, Queensford College's website.

9.8. Agents who have recruited/enrolled students will be reviewed based on:

- Monitoring evidence gathered throughout the duration of the agreement
- Number of student enquiries received from the agent
- Number of students enrolling from the agent
- Number of students dissatisfied, if any, with the agents services and
- Student study outcomes (e.g. course completion rates, visa compliance)
- Department of Home Affairs data, in relation to visa grant / refusal rates;
- Student feedback

9.9. 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.

9.10. 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.

9.11. The Associate Director considering the review evidence has a number of options for agreements due to expire including:

- Renew or decide not to renew the agreement
- Notify the agents of renewing the agreement
- Notify the agents of unsatisfactory performance and renew the agreement
- Implement some corrective or preventive actions, if any and renew the agreement.
- Terminate the agreement
- The agents that are not renewed will be removed from PRISMs, ASQAnet and Queensford College website.

9.12. Renewal of Agreement: Agents who satisfy Queensford College requirements will be issued a new agent agreement for a period of up to two years.

Corrective and Preventative Actions

9.13. If, as a result of ongoing monitoring or as the result of a review at renewal, the Marketing office has concerns about the performance of an education agent the Associate Director may authorise some form of corrective or preventative action. Queensford College will take immediate corrective and preventative action upon becoming 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 Australian education and training.

9.14. Corrective and preventative action may include:

- a) Requiring the Agent to undertake counselling by Queensford College, about the Agent's responsibilities code of conduct under the agreement and requirements under the National Code
- b) A warning letter
- c) Corrective action may also include termination of the agreement with the education agent.
- d) Preventative action could include training sessions for agents and ensuring they have all the material they need to represent Queensford College accurately and professionally.

9.15. Corrective and preventative actions will be appropriate to the breach of requirements by the Agent. Agents refusing to undertake the required corrective and preventative action will have their agreement cancelled.

9.16. The Associate Director provides half yearly reports to the Executive Management Team on the recruitment of students through the network of Queensford College agents including any issues that have arisen. The Associate Directors report will include but not be limited to number of student enrolments received through agents:

- a) number of students enrolling through agents,
- b) onshore/offshore;
- c) number of students expressing dissatisfaction with agent services, if any; and



- d) number of visa grant / refusal rates of students who were offered.

Terminating the Agreement

9.17. Either Queensford College or the education agent may terminate an agency agreement at any time by giving the other party 30 days prior written notice.

9.18. If the Agent breaches any provision of the Agreement, Queensford College may terminate the Agreement at any time and with immediate effect by giving written notice to the Agent. On termination of the agreement, the agent must:

- a) submit all applications and fees from prospective students received up to the termination date
- b) immediately cease using any advertising, promotional or other material supplied by the Institute and return all material to Queensford College.

9.19. The termination the Agreement by either party will not affect any accrued rights or remedies of either party.

9.20. The agents that are terminated will be removed from PRISMs, ASQAnet and the College's website

10. Agent Feedback form by Students (Template)

Student Feedback Form	Yes or No
Did you receive information on living in Australia?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did your agent provide you with migration advice?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did your agent guarantee successful completion of the training?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did your agent provide you with Sufficient information on Queensford College and its support services?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did your agent guarantee that you will be able to complete the courses in a manner/duration contrary to the offer and agreement issued by Queensford College?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did your agent provide you with incorrect information in relation to the course attendance requirement?	<input type="checkbox"/> Yes <input type="checkbox"/> No
How did you receive the above information?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did you receive any incentive from your agent to study at Queensford College?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Were you happy with the overall service provided by your agent?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did you complete all application forms/document yourself?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did you receive sufficient information in relation to the course (The Course content and duration, associated fees, policies and procedures, modes of study and assessment method, etc.) you are enrolled in to and information on course entry requirements. English Language/Language Literacy and Numeracy requirement as well as other requirements to successfully complete the course?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Did your agent acted honestly and in good faith, and in your best interest while marketing the course and providing you with enrolment services on behalf of Queensford College?	<input type="checkbox"/> Yes <input type="checkbox"/> No
Any other feedback on your agent.	<input type="checkbox"/> Yes <input type="checkbox"/> No

11. Agent Performance: At Renewal or as required (Template)

Agent Name	
Country Serving	
Recruitment Manager	
Review Period*	
Number of Student Enrolled	

Performance Criteria	Satisfactory	Non-Satisfactory
1. Agent's level of understanding of the ESOS Act, Australian visa regulations and Genuine Temporarily Entrant		
2. Agent always provides accurate information about Queensford College including its courses and services to students		
3. Agent aware of Queensford College Terms and Conditions of Enrolment and Refund Policy and always inform students before enrolling to Queensford College		
4. Ethically responsible practice (eg. no fraudulent documents)		
5. Agent pre & post enrolment support to Queensford College and students		
6. Feedback from student(s)		
7. Agent DO NOT promise or guarantee that students would get a job if they completed the course(s) at Queensford College		
8. Agent DO NOT offer you any money or gift such as an iPhone or iPad to sign up to the course(s) at Queensford College		
9. Percentage of incomplete eCoEs <input type="text"/>		
10. Percentage of visa refusal <input type="text"/>		
11. Percentages of visa cancelled <input type="text"/>		

Other Comments (if any)

Office Use Only:

<input type="checkbox"/> Continue appointing the agent <input type="checkbox"/> More training required <input type="checkbox"/> Warning letter issued <input type="checkbox"/> Termination of the agreement	Final Approved <input type="checkbox"/> Yes <input type="checkbox"/> No Initial of Staff Approved: Date:
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Initial of Recruitment Manager Reviewed:	
Date:	

Note: In assessing the Review of Agent Performance:

- The primary factors that are considered (but not limited to):
 - Visa refusal
 - Incomplete CoE's within principal course period of 6 months
 - Visa cancellation by Department of Home Affairs
 - Feedback from students
- For Queensford College, Incomplete CoE beyond the 6 months of the principal course cannot be solely attributed to the work or intention of the agent.
- For Queensford College, Visa Refusals, cannot be solely attributed to measure exactly the work of the agent.

12. 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	Checklist: <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	Contact the referees and forward them the "Agent Reference Check" form. Must receive a minimum of one referee in order to appoint (where provided) 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.
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

13. Associated Documents

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

14. Version Control

Date	Version	Changes made	Author
30 Oct 2018	V1.0	Released for comment	GD
29 Jan 2021	V1.1	Policy reviewed and updated in new policy template	KS
8 May 2024	V1.2	Minor change to monitoring	SV
16 Aug 2024	V2.0	Merged 'Education Agents Policy' and 'Agent Manual'	MR & SV
24 Mar. 2025	V2.1	Few word corrections and updated the footer	SV