



**Choice Business College (CBC)** will take all reasonable measures to ensure our Education Agents have appropriate knowledge and understanding of the Australian International Education Industry.

Choice Business College (CBC) will not use Education Agents who are dishonest or lack integrity.

Education Agents are not authorised to accept payment on Choice Business College (CBC)'s behalf.

Any known activity by the agent that is negligent, careless or incompetent or has engaged in false, misleading or unethical advertising and recruitment practices, will be acted upon immediately and could lead to the termination of the agents agreement with CBC.

Agents as a third party provider to Provider trading name MUST cooperate with ASQA and any other delegated Regulator and provide prompt accurate responses to requests about delivery of services under this agreement.

CBC will enter into written agreements with each agent we engage to formally represent us.

This agreement will:

- a. Specify the responsibilities of the Agent and the College and the need to comply with ESOS Framework including the National Code.
- b. Our expectation they provide students with current, accurate marketing material.
- c. State our processes for monitoring their activities including where any corrective action may be required
- d. State termination conditions, including details of what would be considered a breach of the agreement.
- e. State details of action that will be taken should an agent breach the agreement.

CBC will keep copies of our monitoring processes, and full details of termination of agents including immediate preventative and corrective action taken including a log of conversations/emails.

If an agent approaches CBC on behalf of a student, no agreement is required, as the agent has not been authorized to promote CBC or our courses on an ongoing basis. In this case we will write on the Letter of Offer that the agent IS **NOT** acting on behalf of CBC.

All current agent details (agents who we have an agreement with) must be recorded in PRISMS and published on our website.

Education Agents' personal information will be accessed by the Australian Government Department of Education and Training, Department of Home Affairs (DHA) and other Commonwealth agencies that access PRISMS. This information may be disclosed to other Australian Government entities (including, but not limited to ASQA and TEQSA), education institutions and publically. The Australian Government Department of Education and Training will share individual agents' performance publically as aggregated data (but will not identify agent – provider relationships). Agent-provider relationships will only be identified when data is shared with education providers and other Australian Government entities.

Education Agents will not have access to PRISMS on CBC's behalf.



CBC recommends our agents (as stated in our agreement) participate in the 'Education Agent Training Course' online <https://eatc.onlinetrainingnow.com/courses/education-agent-training-course>

CBC has a documented process for monitoring agents marketing material to be current and informing agents of any changes applicable to them.

CBC does not have to advise intending students whether or not they have an agreement with an agent.

CBC WILL NOT accept students or enter into an agreement with an education agent if it knows or suspects the agent to be:

1. Engaged in any dishonest practices or if we know they have previously engaged in dishonest practices.
2. Recruiting or enrolling anyone other than genuine/bona fide students
3. Providing immigration advice where they are not authorised to do so under the Migration Act 1958.

We will monitor agents by **one or more** of the following:

- a. regular face-to-face meetings with agents onshore or offshore;
- b. telephone/teleconference meetings;
- c. regular reports from agents;
- d. surveys of students recruited by particular agents, during orientation;
- e. surveys of parents of the students recruited by particular agents;
- f. performance benchmarks included in agreements;
- g. spot checks by the College, for example, to observe agents at work at education fairs; or
- h. Surveys of agents.

## PROCEDURE/PROCESS

All agents engaged by CBC must complete and sign an Agent Agreement.

The CEO /Marketing Manager are responsible for monitoring agents and to ensure agent contracts are current.

CBC does not have to advise intending students whether or not they have an agreement with an agent.

All current agents MUST be listed on PRISMS and the CBC website; this list must be kept current at all times.

Agents will only be engaged by the Marketing Manager or CEO.



All students and families will be provided with a survey/feedback to complete about their dealings with the agent during orientation or as soon as possible after enrolment. This feedback is to be given to the Marketing Manager/CEO for appropriate action.

Local agents will be visited by CBC staff a minimum of 6 monthly.

Off shore / non-local agents will be contacted by phone a minimum of 6 monthly.

Agents are required to report their activity on behalf of CBC 6 monthly (in writing) and complete a written survey annually.

Evidence of agent monitoring will be kept on the agent's file for audit.

All agents are to be monitored and all grievances / complaints followed up as a matter of urgency.

Any known activity by the agent that is negligent, careless or incompetent or has engaged in false, misleading or unethical advertising and recruitment practices, will be acted upon immediately and could lead to the immediate termination of the agents agreement with CBC.

Any know fraudulent activity by an agent will be reported to DHA and DET.

The Compliance Manager/Marketing Manager will send any updated marketing material to all agents as soon as it is approved to ensure currency of agent information. This will include a list of most current information the agent should have, to enable them to check against their stock/electronic versions.

The Compliance Manager /Marketing Manager are responsible to ensure the website contains current Agent details at all times.

National Code Standard 4 must be adhered to at all times.

#### **FORMS/LETTERS /TEMPLATES FOR POLICY/PROCEDURE**

*Education Agent Agreement*

*Student Survey of Education Agents*