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Purpose

This policy is to ensure that the Paramount International College (PIC) uses education agents who have an appropriate knowledge and understanding of the Australian international education industry and do not use education agents who are dishonest or lack of integrity.

This policy will also ensure that intending students will benefit from the monitoring strategies of Paramount International College and from Paramount International College's ability to terminate agreements with education agents who engage in false or misleading recruitment practices.

This ensures compliance with Standard 4 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018. It also ensures compliance with Clauses 2.3, 2.4 and 8.3 of the Standards for RTOs 2015 with regard to third-party arrangements.

Definition

DE means Department of Education

DHA means Department of Home Affairs

ESOS Act means the Education Services for Overseas Students Act 2000 which can be accessed from <https://www.legislation.gov.au/Details/C2022C00066>

National Code means National Code of Practice for Providers of Education and Training to Overseas Students 2018 which can be accessed from <https://www.legislation.gov.au/Details/F2017L01182>

RTO means Registered Training Organisation, a provider and assessor of nationally recognised vocational education and training.

SRTO means the Standards for RTOs 2015, refer definition of 'Standards', which can be accessed from <https://www.legislation.gov.au/Details/F2019C00503>

Standards mean the Standards for Registered Training Organisations (RTOs) 2015 of the VET Quality Framework which can be accessed from www.asqa.gov.au

Training Product means AQF qualification, skill set, unit of competency, accredited short course or module.



Policy

1. Recruitment of Agents

- Paramount International College will only work with reputable education agents who have an appropriate knowledge and understanding of the Australian international education industry and Australian vocational education and training (VET) sector.

2. Written Agreements

- Paramount International College develops and implements a written agreement with each Education Agent that is engaged to recruit students on its behalf. All written agreements are recorded in the Education Agent Agreements Register.
- Written agreements will specify all of the following:
 - Paramount International College responsibilities, including that Paramount International College is responsible at all times for compliance with the ESOS Act and National Code 2018.
 - Paramount International College requirements for agents who represent them, including the requirement to:
 - declare in writing and take reasonable steps to avoid conflicts of interest with duties as an Education Agent of Paramount International College.
 - observe appropriate levels of confidentiality and transparency in dealings with overseas students or intending overseas students.
 - act honestly and in good faith, and in the best interests of the student.
 - have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.
 - Paramount International College processes for monitoring the activities of Education Agents in representing the provider, and ensuring the Education Agent is giving students accurate and up-to-date information on Paramount International College services
 - corrective action that may be taken by Paramount International College if an Education Agent does not comply with its obligations under the written agreement.
 - Paramount International College grounds for termination of the registered provider's written agreement with the Education Agent.
 - the circumstances under which information about the Education Agent may be disclosed by Paramount International College and the Commonwealth or state or territory agencies.
- A list of Education Agents with whom Paramount International College has a written agreement will be included on Paramount International College's website. As a minimum, this information will include the agency name, name of the principal agent and the street address.
- Paramount International College will advise ASQA of third-party arrangements in place within 20 days of the arrangements commencing and within 30 days of the agreement coming to an end.

3. Monitoring and termination

- Where Paramount International College becomes aware that, or has reason to believe, the Education Agent or an employee or subcontractor of that Education Agent has not complied with the Education Agent's responsibilities. Paramount International College will take immediate corrective action.
- Where Paramount International College becomes aware, or has reason to believe, that the Education Agent or an employee or subcontractor of the Education Agent is engaging in false or misleading recruitment practices, Paramount International College will immediately terminate its relationship with the Education Agent, or require the Education Agent to terminate its relationship with the employee or subcontractor who engaged in those practices.
- Paramount International College will not accept students from an Education Agent if it knows or reasonably suspects the Education Agent to be:



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- providing migration advice, unless that Education Agent is authorised to do so under the Migration Act.
- engaged in, or to have previously engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Overseas student transfers).
- facilitating the enrolment of a student whom the Education Agent believes will not comply with the conditions of his or her visa.
- using PRISMS to create CoEs for other than bona fide students.
- The monitoring activities of Paramount International College will identify where an agent may be involved in any of the above activities. Paramount International College will also take into account reports from students where the number of students is a reasonable proportion of the students recruited by an agent (e.g. 3 in 10 students).

4. Marketing Materials

- Education agents will be provided with current and accurate marketing information that meets the requirements of Paramount International College's Marketing and Advertising Policy & Procedure.



Procedure

1. Process new education agent application

Relevant to National Code: Standard 4

Procedure	Responsibility
<p>A. Provide information to potential education agents</p> <ul style="list-style-type: none"> ▪ Email or post potential education agents with the Education Agent Application Form for completion. 	Head of Administration/ Marketing
<p>B. Assess application from agent</p> <ul style="list-style-type: none"> ▪ Acknowledge receipt of application. ▪ Review the application for completeness. ▪ Where the application is incomplete, inform the agent of the additional information required and the requirement to provide this within 60 days or that otherwise the application will no longer be valid. ▪ Consider the information in the application and contact referees as required. ▪ Assess the application based on the responses from referees, the location that the agent will recruit from, the demonstrated understanding of Australian laws in regard to student recruitment and agent experience in the recruitment of international students. ▪ Approve or refuse application. ▪ Notify agents in writing of the decision to approve or not approve the application and include reasons where the application is declined. 	Head of Administration/ Marketing

2. Confirm agreement

Relevant to National Code: Standard 4

Procedure	Responsibility
<p>A. Confirm agreement with new Education Agent</p> <ul style="list-style-type: none"> ▪ Send a copy of the written agreement to the agent for signing with a signed copy to be scanned and returned. The agreement will be valid for 6 months for new applications. ▪ Following receipt of the signed agreement, send a certificate as evidence of registration with Paramount International College to be displayed in agents' offices to indicate to prospective students that they have a written agreement with Paramount International College. ▪ Update the Chief Executive Officer (CEO) about approved agent details. ▪ Add approved agents to Paramount International College's List of approved Education Agents and publish on the Paramount International College website. ▪ Enter details of the education agent into PRISMS. Ensure details are maintained at all times in the event of changes. ▪ Enter details of arrangements into ASQAnet. 	Head of Administration/ Marketing
<p>B. Renew existing agent agreements</p> <ul style="list-style-type: none"> ▪ For existing education agents and subject to effective performance, contracts remain in place until communicated otherwise. ▪ Update Education Agent Agreements Register. 	Head of Administration/ Marketing



3. Implement agent agreement & monitoring

Relevant to National Code: Standard 4

Procedure	Responsibility
<p>A. Induct new agents</p> <ul style="list-style-type: none"> ▪ Provide an overview of Paramount International College’s current marketing prospectus ▪ Discuss student enrolment and selection process ▪ Provide approved marketing materials and discuss the process for updating any revised marketing materials. ▪ Discuss and clarify National Code 2018 requirements and Australasian International Academy’s Education Agent Policy & Procedure. 	Head of Administration/ Marketing
<p>B. Provide up-to-date information to agents</p> <ul style="list-style-type: none"> ▪ Provide up-to-date information to agents through: <ul style="list-style-type: none"> – Email newsletters regarding important information for agents. – Emails, phone calls, text messages or other informal communications regarding specific student issues – Delivering seminars and marketing events with agents when Paramount International College representatives are available in the agent’s region. – Publishing content on the Paramount International College’s website and social media profiles 	Head of Administration/ Marketing
<p>C. Monitor education agents</p> <ul style="list-style-type: none"> ▪ Implement monitoring procedures as per the written agreement. ▪ Use agent monitoring form to conduct and report monitoring. Monitoring is to be conducted every 6 months. ▪ If at any time, monitoring procedures show that the agent is not meeting the terms as specified in the written agreement, investigate the issue as shown below. ▪ Where an agent is meeting the terms as shown in the written agreement, provide written feedback to the agent indicating such. 	Head of Administration/ Marketing
<p>D. Investigate agents who are not meeting the terms of their agreement</p> <ul style="list-style-type: none"> ▪ Seek feedback from the agent on the issue. ▪ Discuss the issue with the Chief Executive Officer (CEO) and decide on the action as follows: <ul style="list-style-type: none"> – Where it is considered that there was no breach of the agreement, write to the agent confirming this. – Where corrective or preventative action is required, inform the agent in writing of breach and action required and timelines. – Where a breach is considered to be major, inform the agent of the reasons, terminate the agreement and report to DHA and DE. Remove the agent from the register. ▪ Where an agent is required to implement corrective or preventative action, monitor the agent to ensure that actions are implemented according to agreed timelines. If actions are not implemented, terminate the agreement as above. ▪ Keep all documentation on file. ▪ Where an agent is terminated, advise ASQA through ASQAnet. 	Head of Administration/ Marketing



Document Control

Document Name:	PIC Education Agent Policy
Version ID:	PIC Education Agent Policy V4.0
Quality Area:	Quality Assurance
Authored by:	External Compliance Consultant and Compliance Officer
Reviewed and approved by:	Chief Executive Officer (CEO)
Date of Approval:	01.01.2024
Standards (National Code)	Standard 4
Standards (SRTO)	Standard 2
Legal Framework	ESOS (Education Services for Overseas Students) Act 2020

Version	Description of Change	Modified Date
3.1	Version ID: PIC-EA-V1.0 Purchased from the provider with this version ID. Customised and branded for PIC. <u>Full Version Education Agent Policy and Procedure</u>	15.04.2015
2020.1	Version ID: PIC-EA-V1.0 Revised version V2020.1 Version naming convention changed to keep consistency across all policies and procedures as well as other PIC documents. Reviewed and updated against the current SRTOs and National Code Standards. Reviewed and updated according to the current administrative and legal frameworks in practice.	28.09.2020
4.0	Version ID: PIC-EA-V1.0 Version naming convention changed to keep consistency across all policies and procedures as well as other PIC documents while reviewing all documents in the context of regulatory performance assessment report. Reviewed and updated government department names and internet reference links for legislation tools. Reviewed the policy and procedures to align with the practice and updated responsibilities according to the current organisation structure.	01.01.2024