

ENGAGEMENT OF EDUCATION AGENTS

STANDARD 4:- Education Agents

Purpose	The main purpose of the Engaging Education Agents Policy and Procedure is to outline the measures taken by Swann College to manage the activities of education agents who promote Swann College with ensuring that they adhere by ethical standards and maintain integrity. It aims to provide procedures for monitoring education agents' activities and the ability to terminate agreements of agents who use false or misleading recruitment practices. The education agents comply with Swann's obligations under ESOS Act 2000, ESOS Regulations, the National Code and Migration Act.
Scope	This Policy will aide Swann College to engage with education agents who have appropriate knowledge and understanding of the Australian education industry. It would also aide prospective students make informed decisions prior to enrolment in courses within Swann's scope of registration. The agents are being monitored by Swann College with regularly by the Marketing Manager International.
Procedure	<p>The Swann College International Marketing Manager is responsible, under the supervision of the CEO, for the selection, appointment, monitoring and management of the activities of Agents.</p> <ol style="list-style-type: none">1. Agents Eligibility Check<ol style="list-style-type: none">a) Prospective education agents who wish to formally represent Swann College should provide in writing an expression of interest to the International Marketing staff.b) It would be followed by filling in an application form.c) A background / reference check would be conducted on the prospective agents who would include a reference check form filled in by their referees.d) Once the eligibility is determined Swann College and the Education Agent would engage in a formal written agreement.2. Education Agent Agreement<ol style="list-style-type: none">a) Any person who is formally engaged by Swann College to promote its courses with the intention of recruiting students for Swann College shall be required to be approved by the senior management team who will offer an 'Education Agent Agreement'b) All persons approved as an Education Agent shall be required to sign an 'Education Agent Agreement' prior to undertaking any promoting activities on behalf of Swann Collegec) Swann 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:<ol style="list-style-type: none">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

	<p>providers under Standard 7 (Transfer between registered providers);</p> <ol style="list-style-type: none"> ii. Facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa file. iii. Using Provider Registration and International Students Management System (PRISMS) to create e-Confirmations of Enrolment for other than bona fide students; or iv. Providing immigration advice where applicable. v. All agents who are approved by Swann College and have a signed agreement as an Education Agent will be paid a commission fee as outlined in their specific agreement. The agreement, conditions, and authorisation to promote Swann College relates to the Education Agent named in the agreement and, any sub-contractors or employees of the Education Agent must be authorised by Swann College. vi. The original signed agent agreement shall be kept in the Education Agents file and the Education Agent shall also receive a copy for their records. vii. Swann College maintains an 'Education Agents files' that lists all education agents with current agreements with Swann College viii. This register contains the following details: <ul style="list-style-type: none"> ✓ Education Agents Business Name ✓ Contact Person ✓ Address ✓ Contact Details ✓ Area the Education Agent is operating ✓ Dates of engagement ✓ Number of students referred to Swann ✓ Agent's Certificate ix. Swann College will publish a list of all its active education agents on the website and ensure that they are kept up date. <p>3. Updating agents about continuous improvement</p> <ol style="list-style-type: none"> a. Once an agent has been approved and is registered within Swann College a full set of marketing materials will be provided to the Education Agent via email or in-person. b. Any changes to marketing materials will be provided to the Education Agent as per the 'Marketing Policy and Procedure' regular basis. c. Agents will always be provided with current marketing material and where changes are made to marketing material, the new material will be forwarded to all agents via email and in-person.
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	<p>4. Monitoring Agent activities</p> <p>To ensure that Swann College is using reputable agents it will initiate a monitoring procedure with all active agents. This monitoring process is outlined below:</p> <ul style="list-style-type: none"> • Monitoring of Education Agents activities and conduct with prospective students will be gained through feedback collected from students upon enrolment. During the course orientation students will be asked to complete a survey in relation to their dealings with Education Agents that represent Swann. This process ensures that any issues relating to Education Agents providing misleading or dishonest information to prospective students is identified and can be addressed. • All Education agents are required to be reviewed annually. That includes:- <ul style="list-style-type: none"> ✓ Overview of current practices and relationship with Swann College ✓ Ensuring current marketing materials are being used ✓ Ensuring representation of Swann College is appropriate
	<p>Once the review has been done, the results go in their file for record keeping purposes and take any appropriate action if required on their review report.</p> <p>5. Terminating 'Education Agent Agreement</p> <ul style="list-style-type: none"> • Where any practices of the Education Agent are identified as 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, Swann College shall take immediate action. • Where the agent would find doing any unethical practice in Swann's promoting a student cohort nationally or internationally, immediately their contract will be terminated. The termination notes and action documents must be filed to their respective files and informing to all relevant staff of Swann Marketing.
Policy Delegated Authority	Manager International Marketing
Approved by and Responsibility Authority	CEO
Approved Date:	XXXXXXXX
Review Date	XX XXX XXXX
Forms and Documents	<p>Expression of Interest Form</p> <p>Agency Feedback Form</p> <p>Education Agent's File</p> <p>Education Agent's Certificate</p>

ACROYNMS

ESOS Regulations	The Education Services for Overseas Students Act 2000 of the Commonwealth of Australia
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
Education Agent	An accredited person or organisation with authority to promote Swann College courses and services to students to nominated regions.
ESOS Act	The Education Services for Overseas Students Act 2000 of the Commonwealth of Australia, as amended from time to time.