



SV500-15 EDUCATION AGENT POLICY

1. RATIONALE

SV500-15 Education Agent Policy address the rights and responsibilities of both Bunbury Cathedral Grammar School and Education Agents in relation to Education Agents contracted to represent the School.

2. SCOPE

This policy includes the following

- 2.1. Education Agents
- 2.2. Head of School
- 2.3. Deputy Head of School
- 2.4. Chief Financial Officer
- 2.5. Marketing and Community Relations Manager
- 2.6. International Students
- 2.7. Parents of International Students

3. POLICY

3.1. *Education Agents*

Bunbury Cathedral Grammar School will engage Education Agents to represent and assist the School with the recruitment of international students, including students who will require a Student Visa 500 (SV500) and students who can study in Australia on another type of temporary visa, as a permanent resident or as a citizen of Australia. Education Agents:

- 3.1.1. will generally be based off-shore and located in countries and cities being targeted by the School for recruitment of students
- 3.1.2. may be based onshore, but will only be engaged for:
 - students studying on a SV500 and where the student has completed at least six months study in their previous principal course of study and meets the School entry requirements. Such enrolments will be considered by the School if vacancies are available and the School is convinced that there are legitimate reasons for the student wanting to change schools, and that the change is being driven by the student and not the Agent. See *SV500-3 Students Transfer Policy*
 - for students based offshore who meet the School's *SV500-2 Entry Requirements Policy*

3.2. *The Role of Education Agents*

Education Agents will be engaged to assist the School as follows:

- 3.2.1. Promoting the School and its courses to prospective students in the countries and regions agreed to by both parties
- 3.2.2. Recruiting and assisting in the recruitment, application and enrolment process of prospective students to study at Bunbury Cathedral Grammar School, in line with the School's policies and CRICOS registered courses
- 3.2.3. Provide prospective students with accurate, relevant, and necessary information about the School's entry requirements, courses, fees, facilities, boarding accommodation options, wellbeing program, co-curricular options and life in Bunbury. This information must be accurate, approved by the School and comply with the National Code 2018
- 3.2.4. Assist the student to book an AEAS Test, or arrange any other assessment required by the School



- 3.2.5. Assist the student to complete the School's Application for Enrolment Form and submit all required and certified documentation
- 3.2.6. Advise the student of their obligation, and that of the agent, to be fully transparent with the School about any matters (academic, health and wellbeing, social, emotional and/or physical) which may impact the student's learning. This includes any matters which may hinder the student's ability to meet satisfactory achievement requirements for their course of study.
- 3.2.7. Assist the student to complete all enrolment documents, if offered a place of enrolment
- 3.2.8. Assist the student to complete and lodge Visa application, if required
- 3.2.9. Maintain contact with the students and parents over the duration of the student's enrolment at the School, supporting them as necessary with communications with the School about the student's progress and wellbeing

3.3. Education Agent Approval Process

Prior to engaging an Education Agent, the School's Marketing and Community Relations Manager will:

- 3.3.1. Interview the Principal Agent, in-country where possible (or via online service) to gain an understanding of the Agent's experience in the industry, approach to recruitment, knowledge of international education and the Australian education market, and experience in the Australian Schools' market
- 3.3.2. Assess and review the Agent's online presence
- 3.3.3. Seek and make contact with three referees (CRICOS Registered Providers), two of whom should be from the Australian School sector, about their experience with the Education Agent in question

3.4. Education Agent Agreement

- 3.4.1. All Agents approved to represent the School must complete and sign the *Education Agent Agreement* before marketing to or recruiting students on behalf of the School. The Agreement will be co-signed by the Head of School (or nominee) and both parties will retain copies of the Agreement
- 3.4.2. The Agent cannot assign this agreement (or part thereof) or subcontract this agreement to any third party without the prior consent of the School

3.5. Provider Registration International and Student Management System (PRISMS)

- 3.5.1. Upon signing the *Education Agent Agreement*, the School is required to enter and maintain the education agent's details in PRISMS.

3.6. Publishing Approved Education Agents

- 3.6.1. Upon receiving the signed *Education Agent Agreement* and adding the agents details to PRISMS, the Marketing and Community Relations Manager will authorise and arrange for the Education Agent's details to be published on the School's website

3.7. Education Agent and Training

- 3.7.1. The School is obliged and committed to providing all Education Agents with training, enabling them to represent the School accurately.
- 3.7.2. Where possible, the Marketing and Community Relations Manager will offer this training to the Principal Education Agent and their education consultants at the offices of the Agent. Where this is not possible, the training will be conducted online. The initial training will occur within three weeks of the Agent



signing the Agent Agreement and prior to the Agent promoting the School or recruiting any students for the School

- 3.7.3. The Marketing and Community Relations Manager will provide training updates to agents annually, and/or as changes at the School occur
- 3.7.4. All Agents will be provided with updated marketing material as it is published and an update to International Student Fees on an annual basis

3.8. *Expectations and Obligation of Agents*

Education Agents must:

- 3.8.1. comply with the requirements of the ESOS Act 2000 and Australian National Code of Practice 2018 (National Code 2018) and pay particular attention to Standards 1-4
- 3.8.2. adhere to the [*Australian International Education and Training Agent Code of Ethics*](#)
- 3.8.3. be informed about and comply with all of the School's policies which apply to International Students, including SV500 Students
- 3.8.4. maintain confidentiality and transparency in all matters concerning the students, while acting honestly and in good faith
- 3.8.5. act in the best interest of students at all times
- 3.8.6. declare any conflicts of interests when representing students and the School, including but not limited to:
 - charging service fees to both overseas students and registered providers for the same service
 - personal or financial relationships with a prospective student and family (this applies to employees of the agent)
 - financial interest in any third-party provider involved in the enrolment of a prospective student at Bunbury Cathedral Grammar School
 - any financial, administrative or supervisory role in any testing or assessments required of the student

3.9. *Managing and Monitoring Education Agents*

The Marketing and Community Relations Manager will monitor and review the performance of Education Agents as follows:

- 3.9.1. Update the details of the Education Agent involved in each enrolment via the PRISMS system
- 3.9.2. A regular review of the Agent's performance, to be undertaken at least every six months at the discretion of the School including a record of inquiries and outcomes
- 3.9.3. Checks to be undertaken by representatives from the School at the agent's premises and at promotional events. These checks will include the requirement for the Agent to be using current promotional material
- 3.9.4. A survey of parents of students, and students recruited by the Agent will be conducted annually

3.10. *Corrective Action*

- 3.10.1. The School reserves the right to terminate the Agent Agreement immediately if at any point the School suspects that a contracted Education Agent:
 - is negligent, careless or incompetent
 - has knowingly withheld vital information from the School, which may impact the student's ability to meet their course requirements
 - has engaged in false, misleading or unethical advertising, or recruitment practices



- has provided migration advice, unless the Education Agent is authorised to do so under the Migration Act
- facilitated the enrolment of a student, whom the Education Agent suspects or believes will not comply with the conditions of his or her visa
- deliberately attempted to recruit a student where this clearly conflicts with the School's *SV500-3 Student Transfer Policy* and the obligations of registered providers under Standard 7 of the National Code 2018
- initiates and actively encourages students to leave Bunbury Cathedral Grammar School in Year 11 or 12, where such a move is being driven by the Agent seeking an extra commission and not the best interests of the student.

3.10.2. Alternatively, the School may decide, at the discretion of the Head of School, to engage in corrective action with the Agent. Corrective action may include but is not limited to:

- On-shore training for the Agent
- Requiring the Agent to complete the [AEI on-line Agent Training Course](#)

3.11. Reporting Agents

3.11.1. In the case that an Agent has breached the terms of the Education Agent Agreement, engaged in unethical recruitment practices, and is not complying with the National Code the School will terminate the Education Agent Agreement and report the termination of the Agent via PRISMS.

3.12. Agent Fees

3.12.1. The School will pay Education Agents a commission for the recruitment of each new student. The commission rate and conditions will be decided by the Head of School on an annual basis.

3.12.2. The *Education Agent Agreement* will specify the commission to be paid for the successful enrolment of each student and the conditions of payment.

3.13. Disclosure of Information

3.13.1 The School is required under the National Code 2018 to enter details of all Education Agents it has agreements with into the Provider Registration and International Student Management System (PRISMS).

3.13.2 The School will only share or publish information about education agents in a manner consistent with the Australian Privacy Policy

3.13.3 Further to 3.13.2, the School will only disclose personal information without obtaining individual consent, if that use or disclosure is required, or authorised by, or under an Australian law or a court/tribunal order.

4. LEGAL AND OTHER REQUIREMENTS

See SV500-4 CRICOS Registration Policy

5. ASSOCIATED POLICES, PROCEDURES, GUIDELINES AND FORMS

- ❖ **Education Agent Agreement**
- ❖ POL-060 Critical and Emergency Incident Management and Response Plan
- ❖ SV500 Fee Schedule
- ❖ SV500-1 Marketing Information and Practices Policy
- ❖ POL-227 Privacy Policy
- ❖ SV500-10Accommodation Policy
- ❖ SV500-2 International Student Entry Requirements Policy



- ❖ SV500-12 Health Management Policy
- ❖ SV500-13 Support Services Policy
- ❖ SV500-14 Welfare Policy
- ❖ SV500-19 Complaints and Internal Appeals Policy
- ❖ SV500-20 Course Progress Policy
- ❖ SV500-8 Deferring, Suspending or Cancelling Enrolment Policy
- ❖ SV500-22 External Appeals Policy
- ❖ SV500-7 Fee Policy
- ❖ SV500-16 Refund Policy
- ❖ SV500-3 International Student Transfer Policy
- ❖ SV500-23 Visa Requirements Policy

Version Control				
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