

Statutory and regulatory compliance

- National Code of Practice for Providers of Education and Training to Overseas Students 2018 Standard 1, 4, 7
- ELICOS Standards P8
- International Education and Training Agent Code of Ethics

Related Policies

- Continuous Improvement
- Stakeholder Interviews
- Providing Feedback to Contributors to Continuous Improvement
- Student Support and Welfare Services
- Fees and Charges
- Refunds
- Ethical Marketing
- Applications, Offers and Enrolments
- Enrolment Offer and Acceptance Agreement
- Welfare of Younger Students
- Information Provided to Applicants Prior to Enrolment

Related Documents

- Agent agreement
- Agent certificate of appointment
- Detailed Online Agent application
- Online Agent contact register (Salesforce)
- Agent referee check record
- Agent survey and feedback

- Agent update e-shots
- Email indicating corrective action is required of an agent
- Email informing agents of changes to marketing material

Policy

Education agents who are accepted by Study Group Australia PTY Limited (Embassy English) for the recruitment of students are required to enter into a written agreement with Study Group Australia PTY Limited which specifies the obligations of the agent and the obligations of Embassy English. Embassy English will thoroughly check the suitability of agents before entering into agreements with them.

Embassy English will ensure that education agents with whom agreements are entered into have an appropriate knowledge and understanding of the Australian international education industry. Embassy English will ensure that it does not enter into agreements with agents who are dishonest or lack integrity. Embassy English will at all times ensure that it enters and maintains the education agent's details in PRISMS.

Embassy English will monitor the performance of agents to ensure that they provide applicants with necessary pre-enrolment information. Embassy English will not accept students from an education agent whom is known or reasonably suspected by Embassy English of providing immigration advice where not authorised to do so under the Migration Act 1958.

Embassy English will provide education agents with current and accurate marketing information.

Agent agreements may be terminated by Embassy English if agents take negligent, unethical or incompetent action.

Procedures

Study Group and Embassy English Agent Selection

Potential Agent completes the online "Application to Become a Embassy English Agent" which is accessed through Study Group's website or Embassyenglish.com. The application asks the following questions;

- Agency name and contact details
- Number of students sent abroad last year and where
- Business licensed and when
- Number of counsellors and the number of years' experience they have
- Media used for advertising
- References

The online application is automatically sent through to the relevant country Embassy English Sales Manager

The Embassy English Sales Manager assesses the application and may refuse on-line. If refused then no further action is required as the agent will receive an automated response thanking them for their interest but notifying them that Embassy English is not taking on any new agents in this region at this time.

If the Embassy English Sales Manager decides the applicant is of interest to Embassy English an appointment is made to visit the agents office and/or meet with the agency Director/Manager within 6 weeks of the application (NB: wherever possible an agent will not be formally appointed without an office visit and a meeting with the Agency Director/Manager. Where geographic restraints limit the ability to visit within 6 weeks then a comprehensive phone interview is undertaken).

During the visit to the potential agent's office the information provided in the online application is verified and further information is sought;

- Details about office structure (application and recruitment process/responsibilities of individual staff/links with English language schools)
- Details about counsellors (of particular relevance is the number of years' experience of the staff in this industry - Embassy English will rarely work with newly established education agents, unless they have senior counsellors who are already known/experienced in this industry)
- Method of recruiting students
- Number of students sent abroad and to which countries
- Fees charged by agent to students and for what services

If the Embassy English Sales Manager is interested in working with the agent after the interview/office visit then Reference Checks may be undertaken with two of the referees provided by the agent. The Reference Checks request international institutions who are already working with this agent to provide the following information;

- Please give a brief summary of your business dealings with this agent.
- How long has the agent worked with your institution?
- Are you satisfied with the recruitment performance of this agent?
- In your opinion does this agency deal with its students and institution clients professionally and reliably and do you feel that they are reputable agents?

At this point if the Embassy English Sales Manager is satisfied that Embassy English should work in partnership, the Embassy English Sales Manager approves the Agent on Embassy English's CRM (Salesforce) and a Welcome Letter is sent automatically.

The agent receives an automated communication of their Unique Reference Number (URN) and the instructions on how to access the Partners website where their Agent Contract is stored. They will need to accept the conditions of the contract on line.

Within 1 week of Contract being accepted on Partners Embassy English training is conducted. This training is usually conducted over a few days to allow sufficient time to cover all Embassy English programmes (if the agent is representing all Embassy English programmes)

Embassy English will then add details of the approved agent on PRISMS to notify to the Department of Human Affairs (DHA; www.humanaffairs.gov.au) the successful appointment of an agent. Embassy English will at all times monitor this list on PRISMS to ensure it accurately reflects the current agents associated with Embassy.

Agent Management

The role of Embassy English's Partner and Accounts team worldwide is to monitor and assist Embassy English agents to recruit students into our programmes in Australia, Canada, New Zealand, UK, Ireland, the Netherlands and the USA.

The following activities are undertaken with agents:

Group Agent Training Sessions each quarter in each of our key markets are organised. Agents also receive a Partners Manual with exhaustive details of the programmes and Universities, as well as access to Partners, our exclusive agent-facing website with up to date information on all Embassy English programmes.

Individual trainings and/or visits to agent offices - these visits include activities such as programme and country training; counselling with potential students and parents; scholarship interviews; materials (brochures/posters) updates

Daily phone calls and emails with student counsellors - updating on latest Embassy English programme information; students' application progress; Embassy English marketing plans and visitor schedule; seeking information about market trends; comments on our service

Visits from product specialists are arranged for the benefit of all agents. Active agents are visited frequently (once per quarter minimum) by a specialist Brand Recruitment Manager, for detailed update training

Counselling staff from active agents may be invited on an annual basis to visit Embassy English's various institutions, with all costs paid for by Embassy English (airfares, accommodation and meals). The counsellors selected to attend these "Familiarisation Trips" each year are not necessarily those from our top agents but rather those who have demonstrated a high level of service and a genuine interest in recruitment to Embassy English's institutions.

Webinars with International Marketing Managers and University Partner Institutions are held on a regular basis to ensure all agents and their staff are aware of all new regulatory advice.

In-market Agent Training Visits from International Admissions Centre/Visa Compliance Manager/Centre Heads/ Academics/Programme Managers with presentations, updates, group discussions etc.

Combined in-market events by Embassy English Regional Offices and International Offices of Partner Universities

Open Days for students/parents and agents with University IO and Embassy English academics

Agent Risk Management Process

The recent developments in Australian government regulations for student visas and the resulting heightened focus on our enrolment procedures, accuracy of student visa information and assessment of student academic ability has highlighted the importance of our agent management. It is critically important for us to be compliant with government guidelines and for student enrolment and visa information to be accurate and true.

In particular, this has highlighted, now more than ever, that we need to rely on our agents and feeder partners to represent us accurately and with integrity.

In order to control and minimise this risk of losing our registration, the introduction of this formalised agent warning process gives Embassy English staff and our partner agents a structured, transparent and fair procedure to follow.

Steps:

Any member of staff encountering a situation where an agent has broken the terms of our Agent Agreement or has acted in any way that would compromise our status with the government should bring the instance to the attention of:

- Global Sales Director
- Relevant Partner Director
- International Admissions Centre (IAC) Director

The case will then be managed by the IAC Director and reviewed by the above in conjunction with the relevant Partner/Account Director and Recruitment Director at each stage.

A database will be maintained by the IAC Director of the agencies involved and at which stage.

If it is decided that the agent is at fault and knowingly broke our enrolment guidelines, while placing us at risk, or is negligent or uncooperative in relation to the case, then the agent will be issued with the 'Initial Agent Warning Letter'.

Where a Student Visa has been refused due to an agent misguiding the student and/or being negligent in preparing the student for the Visa application, Embassy English reserves the right to reconsider agent commission payments for up to £5,000 which may be due, as per the Study Group Policy.

After a 2nd such instance, the agent will be issued with the 'Second Agent Warning Letter'.

After a 3rd such instance, the agent will be issued with the 'Agent Termination Letter' at which point the agent ceases to be an Embassy English representative.

Please note that in cases where an agent has falsified an enrolment document, knowingly allowed a student to misrepresent themselves on an application or any other extreme cases of negligence, Embassy English reserves the right to immediately terminate any agency agreement.

After termination we will inform the relevant government department of the agent's details to record that we are no longer working with this agent.

Student Non-Arrival Process:

When a student sponsored by Embassy English or by a partner University on behalf of Embassy English, fails to arrive in centre as expected, the following steps will be taken:

- IAC reconfirm with the centre that the student has not arrived, 24 hours after expected arrival date
- IAC will then contact the agent, copying the relevant Recruitment Manager and Partner/Account Manager, to ascertain the student's whereabouts
- If no response within 48 hours, IAC will reattempt to contact the agent
- Head of Centre will inform the relevant authorities at this stage, if appropriate
- We request a full and formal account of reasons the student is not in centre

These full report days could include:

- Proof of reason for student not attending
- Proof of leaving the country
- Proof of attendance at other institution (students attending other institutions do not count towards non-compliance statistics, if proof is received)

If the report is not forthcoming within 3 working days, we reserve the right to implement the agent warning process

Policy Version Details	
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Document History

Commencing Date	Summary of Changes	Next Review Date
December 2017	v4.0 Review, minor amendment and approval	December 2022
06 April 2018	v4.1 Review and amendment to maintain currency with business and regulatory changes	December 2022
31 August 2018	V4.2 Administrative amendments	December 2022