

Education Agents Policy & Procedure

National Code Standard 4

Federation Technology Institute (FTI) will take all reasonable measures to ensure our Education Agents have appropriate knowledge and understanding of the Australian International Education Industry and Training Agent Code of Ethics.

Federation Technology Institute (FTI) will not use Education Agents who are dishonest or lack integrity.

Education Agents are not authorised to accept payment on Federation Technology Institute (FTI) '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 agent's agreement with FTI.

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

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

This agreement will:

- a. Federation Technology Institute responsibilities, including that Federation Technology Institute is responsible at all times for compliance with the ESOS Act and National Code 2018.
- b. Federation Technology Institute requirements for agents who represent them, including the requirement to:
 - declare in writing and take reasonable steps to avoid conflicts of interests with duties as an Education Agent of Federation Technology Institute.
 - 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.
- c. Federation Technology Institute 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 Federation Technology Institute services
- d. corrective action that may be taken by Federation Technology Institute if an Education Agent does not comply with its obligations under the written agreement.

- e. Federation Technology Institute grounds for termination of the registered provider's written agreement with the Education Agent.
- f. the circumstances under which information about the Education Agent may be disclosed by Federation Technology Institute and the Commonwealth or state or territory agencies.

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

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

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

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

All prospective agents must undertake and provide evidence of completion the Education Agents Training Course (EATC) offered by PIER (Professional International Education Resources) or a recognized equivalent and belong to a professional association representing education agents where one exists.

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

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

FTI 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. A regular review of the Agent's performance, to be undertaken at least every six months at the discretion of CAC including a record of inquiries and outcomes.
- b. Spot checks to be undertaken by representatives of CAC both at the agent's premises and at promotional events.
- c. Surveys of students recruited by the Agent regarding the accuracy, usefulness and comprehensiveness of the information received from the Agent.

- d. Accessing PRISMS Agent Performance Reports (the Australian Government Department of Education and Training's review and publication of PRISMS data on student outcomes associated with international education agents).

PROCEDURE/PROCESS

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

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

FTI 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 FTI website; Compliance Manager /Marketing Manager to ensure this list must be kept current at all times.

Agents will only be engaged by the Marketing Manager.

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 Compliance Manager/CEO for appropriate action.

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

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

Agents are required to report their activity on behalf of FTI 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 agent's agreement with FTI.

Any known fraudulent activity by an agent will be reported to the Department of Home Affairs and the Department of Education and Training.

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.

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