



# Agent Recruitment and Development Policy

Policy Area: Corporate Governance

Approval: Executive Principal

Signature:

Date:

## 1. PURPOSE

This Policy explains Sheridan College’s process of application and approval in the recruitment and selection of education agents. The College will ensure that the agents engaged by the College have appropriate knowledge of the Australian education system. Sheridan College will engage in strict monitoring of agents and will suspend or terminate education agents who do not act in an appropriate manner, ensuring all agents are honest and professional in their representation of the Sheridan College courses.

This policy aligns with Sheridan College’s strategic plan and compliance obligation with:

- The Higher Education Standards Framework (2015);
- The Education Services for Overseas Students (Act 2000);
- The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (2018); and
- The Competition and Consumer Act (2010).

## 2. CONTEXT

In implementing this policy Sheridan College shall:

- Keep itself informed of the current state and federal legislation and regulations relating to agents’ recruitment.
- Seek to go beyond legal compliance and minimum standards and to promote a culture of high standards for agents representing Sheridan College, through rigorous recruitment and management practices.
- Ensure that information is accurate for agents conducting marketing to inform international students on Sheridan College’s course offering and is accessible online.
- Ensure that all staff, agents, and students receive accurate information on course and unit structure during the admission process.

## 3. RESPONSIBILITY AND ACCOUNTABILITY

Initial approval of policy and later amendments:	Board of Directors
Amendment of procedures consistent with the policy:	Executive Principal
Distribution of policy:	Executive Principal
Implementation of policy:	Executive Principal, Academic Principal, Director of Student Services

Monitoring and compliance of policy:	Academic Council, Executive Principal, Academic Principal, Director of Student Services
Evaluation and recommendations for amendments:	Academic Council, Executive Principal, Academic Principal, Director of Student Services

#### 4. POLICY STATEMENT (S)

Sheridan College will enter into a written agreement with each education agent engaged as a formal representative. The details of each agent will be entered and maintained in PRISMS.

The written agreement will outline:

- the responsibilities of Sheridan College, including the responsibility for compliance, at all times, with the ESOS Act and National Code 2018;
- the requirements of the agent in representing Sheridan College as outlined in Standard 4.3 of the 2018 National Code;
- Sheridan College’s processes for monitoring the activities of the education agent in representing the College, and ensuring the education agent is giving students accurate and up-to-date information on Sheridan College’s services;
- the corrective action that may be taken by Sheridan College if the education agent does not comply with its obligations under the written agreement, including providing for corrective action outlined in Standard 4.4 of the 2018 National Code;
- Grounds for termination of the Sheridan College written agreement with the education agent, including providing for termination in the circumstances outlined in Standard 4.5 of the 2018 National Code; and
- the circumstances under which information about the education agent may be disclosed by Sheridan College and the Commonwealth or state or territory agencies.

In accordance with the 2018 National Code, Sheridan College requires its education agents to:

- declare in writing and take reasonable steps to avoid conflicts of interests with its duties as an education agent of Sheridan College;
- observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students;
- act honestly and in good faith, and in the best interests of the student; and
- have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.

Where Sheridan 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 under standards 4.2 and 4.3 of the 2018 National Code, the College will take immediate corrective action.

Where Sheridan 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, the 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.

Sheridan College will not accept students from an education agent if it knows or reasonably suspects the education agent to be:

- 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 of the 2018 National Code;
- facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her visa; and/or
- using PRISMS to create CoEs for other than bona fide students.

## 5. PROCEDURE

The Sheridan College procedure for recruiting and developing agents is summarised in the Flowchart attached to this policy as Appendix A.

When an agent contacts Sheridan College requesting an agent agreement, the Registrar sends the agent a Sheridan College Agent Application Form.

The Registrar processes all completed application forms and undertakes a number of quality assurance checks:

- If the agent is an immigration agent, then MARA is checked.
- If the agent is an education agent, PIER registration is checked.
- References for the agent are checked.
- Websites of listed partner providers are checked to make sure that the agent has been truthful and has strong and ongoing partnerships with providers.

If all quality assurance checks are successful, the agent is invited to a meeting to provide the agent with detailed information about the courses and services provided by Sheridan College. These meetings are held face-to-face for onshore agents and via phone or Skype for offshore agents.

If both parties are satisfied to proceed, the agent is provided with a copy of the *Sheridan College Agent Agreement*. The agent can review the document, which clearly outlines the responsibilities of the agent and the College. Once the agreement is signed, a digital copy is kept securely on file and the agent's details are added to PRISMS and the College website as soon as possible.

Reviews are conducted twice a year or immediately if there is a serious issue arising. See appendix for agent report template. These reviews involve collating student performance, student reviews of the agent, communication with the agent and documenting the review process and outcomes.

- If the performance of the agency is satisfactory or better, (for example, students are persevering and genuine, student reviews are positive, documentation is complete and thorough), the agency is commended for their service.
- If problems are identified the agent is given a formal warning. The formal warning explains the issues that have arisen during the review process. The agency is informed that for a period of one trimester the school will not accept new student applications from this agency while the school monitors the performance and satisfaction of current students from this agency. The agency is offered online training to improve their understanding of Sheridan College standards for agent conduct.
- If the College is satisfied that all quality standards have been met after training, the agent is informed that they may start sending student applications again. The agent is also cautioned to be thorough and careful in the future.
- If the College is not satisfied that services provided by the agent will improve, or if there is any evidence that the agent is engaging in false or misleading recruitment practices, the agency is informed that the agreement with the agency has been terminated and will not be

re-signed. Agent details are removed from PRISMS and the College website as soon as possible.

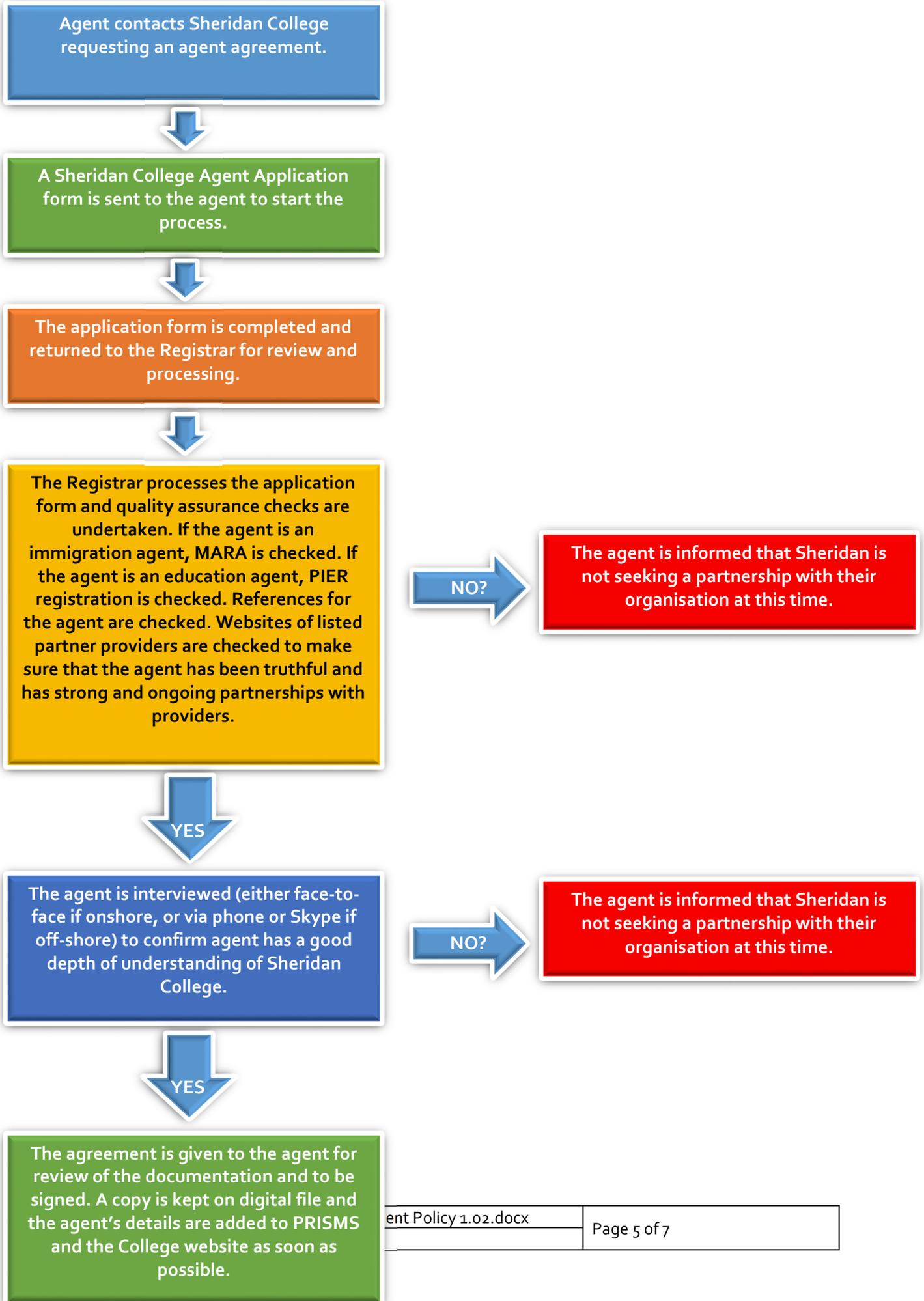
Agents will be kept informed of any updates relating to Sheridan College and encouraged to sign new agreements when current agreements are reaching the termination date.

## 6. APPENDIX: DOCUMENT HISTORY AND VERSION CONTROL RECORD

<b>Document Title:</b>	Agent Recruitment and Development Policy
<b>Source Documents:</b>	The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (2018)
<b>Associated Internal Documents:</b>	Sheridan College Agent Application Form Sheridan College Agent Agreement.
<b>Associated External Documents</b>	The Higher Education Standards Framework (2015); The Education Services for Overseas Students (Act 2000); The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (2018); and The Competition and Consumer Act (2010).
<b>Authorised Officer:</b>	Darren Smith, Executive Principal
<b>Approved by:</b>	Executive Principal
<b>Date of Approval:</b>	15 April 2019
<b>Next Review Before:</b>	April 2021

Version Number	Version Date	Authorised Officer	Amendment Details
1.01	15 April 2019	Executive Principal	Policy developed to ensure College internal processes comply with The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (2018).
1.02	17 April 2019	Executive Principal	Minor grammar edits and addition of Agent Sample Report Template.

*Appendix A: Sheridan College Agent Recruitment and Development Flowchart*





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Agents are kept informed of any updates relating to Sheridan College and encouraged to sign new agreements when current agreements are reaching the termination date.



The agent is informed that they may start sending student applications to us. Also, they are cautioned to be thorough and careful in the future.



Agency is informed that the agreement with the agency has been terminated and will not be re-signed. Agent details are removed from PRISMS and the College website as soon as possible

2019 AGENT REPORT – SAMPLE

Student attrition

Total no of students issued CoEs	Total students not completing course (excludes future students)	Attrition rate <i>Benchmark = 25%</i>	AGENT PERFORMANCE
-	-	-	-

KEY	
	Meeting benchmark
	Watch and see future students
	Warning or suspension

COMPLETED/ACTIVE COES			
Graduated	Good standing	Academic probation	Deferred
-	-	-	-
-	-	-	-

INCOMPLETE COES				
Withdrew	Transfer	Terminated	Non-compliant	Did not commence
-	-	-	-	-
-	-	-	-	-

FUTURE COES		
Visa granted	Visa status unclear	
-	-	Is this student still planning to study at Sheridan College (Y/N)? <b>[AGENT PLEASE COMPLETE]</b>
-		
-		
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Student satisfaction

STUDENT SURVEY ANALYSIS AND SUMMARY	RATING

KEY	
	Generally satisfied
	Some areas for concern
	Significant concerns raised

Other comments/concerns/observations

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