

P.04.03

EDUCATION AGENTS POLICY

1.0 INTRODUCTION

In line with the National Code of Practice for Providers of Education and Training to Overseas Students - National Code 2018, Standard 4, AVETA has specifically design this policy and procedure to ensure that its Education Agents act ethically, honestly and in the best interest of overseas students and uphold the reputation of Australia's international education sector.

This means that AVETA must ensure its Education Agents declare and take all reasonable steps to avoid conflicts of interest with its duties as an Education Agent of AVETA (examples of conflicts of interest include, but are not limited to i) when the agent charges services fees to both overseas students and registered providers for the same service; ii) where an Education Agent has a financial interest in a private education provider; or iii) where an employee of an Education Agent has a personal relationship with an employee of AVETA.

In addition, AVETA will also ensure its Education Agents observe appropriate levels of confidentiality and transparency in dealings with overseas students while acting honestly and in good faith; and have appropriate knowledge and understanding of the overseas education system in Australia, including the Australian International Education and Training Agent Code of Ethics. To assist its Education Agents in meeting these requirements AVETA will provide each Education Agent with up-to-date and accurate marketing information and the Australian International Education and Training Agent Code of Ethics. The provision of this material will ensure that AVETA's Education Agents adhere to and practice responsible business ethics, and that Education Agents understand their obligations to provide current, accurate and honest information to overseas students to help them make informed decisions about study in Australia.

Accordingly, AVETA will:

- have a written agreement with each Education Agent they engage with;
- outlining the Agents requirements in representing AVETA in recruiting overseas students on behalf of AVETA;
- AVETA's processes for monitoring the Education Agent's activities and ensuring the Education Agent gives overseas students accurate and up-to-date information;
- the corrective actions that may be taken and the grounds for termination of the written agreement with the Education Agent;
- the circumstances which information about the registered provider may be shared by the registered provider and Commonwealth or state and territory agencies
- enter and maintain AVETA's Education Agent details in Provider Registration and International Student Management System (PRISMS);
- ensure that AVETA's Education Agents have appropriate knowledge and understanding of the Australian International Education and Training Agent Code of Ethics;
- ensure that AVETA's Education Agents act honestly and in good faith;

- take immediate corrective action, or terminate a relationship if an agent is not complying with the National Code (this includes Education Agents that provide migration advice to overseas students when they are not authorised to do so under the Migration Act 1958); or if false or misleading recruitment practices were engaged in by an employee or subcontractor of the Education Agent, the registered provider must require the Education Agent to terminate its relationship with those individuals; and
- not accept overseas students from an Education Agent if it knows or suspects that the Education Agent is engaging in unethical recruitment processes (i.e AVETA will not accept overseas students from an Education Agents if they believe the Education Agent is creating Confirmation of Enrolments (CoEs) in PRISMS for non bona fide overseas students or facilitating the enrolment of overseas students while knowing that the overseas student will not comply with the conditions of their visa.

In addition, AVETA will require

- the Education Agent to declare in writing and take reasonable steps to avoid conflicts of interests with its duties as an Education Agent of AVETA; and
- to observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students; and
- act honestly and in good faith, and in the best interests of the student.