



AGENT SELECTION AND EVALUATIONS POLICY

Approving authority	Governing Board
Approval date	April 2016
Purpose	This policy sets out the basis for the selection and evaluation of education agents to ensure regulatory compliance.
Responsibility for implementation	Institute Director
Next scheduled review	December 2018
Document Location	R:OIHE\Policies\Agent Selection and Evaluation Policy

Background

The Education Services for Overseas Students Act (ESOS) sets out the legal framework governing the delivery of education to overseas students studying in Australia on a student visa. The Australian Government administers the ESOS Act and its associated instruments. The Act governs the registration process and obligations of registered providers.

The National Code of Practice (2007) is a set of nationally consistent standards that governs the protection of overseas students and delivery of courses to those students by providers registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). Standard 4 of the code clarifies the requirements as they apply to education agents.

1 Rationale

The Oxford Institute of Higher Education (herein after referred to as 'the Institute') will take all reasonable measures to use education agents that have an appropriate knowledge and understanding of the Australian international education industry and does not use education agents who are dishonest or lack integrity.

3. Scope

This policy applies to all Institute employees and education agents involved in the promotion of the Institute's courses and services to international students.

4. Definitions

Agent: a qualified education agent counsellor who has a valid Agency Agreement with the Oxford group.

5. Policy

- 5.1 The Institute will use only reputable education agents who abide by the National Code 2007 and ESOS legislative requirements.
- 5.2 Agents will be selected by the Oxford Education Group Marketing team on the basis of their experience in referring students to Australian providers, and referee reports from 2 of these providers that confirm their experience and history and/or ability to comply with the National Code.



- 5.3 The Institute will have a written agreement with each education agent it engages to recruit students on its behalf. The agreement will formalise an ongoing and significant relationship in which the agent has undertaken to recruit students. All agents with current agreements with the Institute will be listed on the Institute's website.
- 5.4 Agent agreements will specify the responsibilities of the education agent and the Institute and the need to comply with the requirements in the National Code including Standards 1 (Marketing Information and practices), 3 (Formalisation of enrolment) and ESOS legislative requirements.

The agreement will include: processes for monitoring the activities of the education agent, including where corrective action may be required and termination conditions, including providing for termination in the circumstances outlined in Standard 4.4 of the National Code.

- 5.5 Processes and strategies to monitor and evaluate the activities and performance of education agents may include (but is not limited to) one or more of the following:
- regular face-to-face interviews with agents(onshore or offshore)
 - telephone/teleconference meetings and briefings
 - the administration of Agent Evaluation surveys to recruited student to gauge service quality
 - spot checks , in order to observe agents at work, for example at education fairs,
 - a comparative review of application conversions to enrolments from agent referrals including total enrolments and the identification of growth trends
 - an evaluation of Agent performance reports as supplied by the Oxford Marketing team, each of whom are allocated a country/region.

The Marketing Manager ensures that all relevant recorded information is used to evaluate agent performance and, provide feedback and is used to inform the range of actions listed below:

- the renewal or termination of an agent agreement
 - the timing of a performance review including follow up of any corrective or preventative remedies required
 - agent surveys or surveys of agents.
- 5.7 The Oxford Education Group Marketing team will ensure that the Institute's education agents have access to up-to-date and accurate marketing information as set out in Standard 1of the National Code (see Marketing Information and Practices Policy). This is and will be done by the provision of regular e-newsletters, updated brochures and other relevant publications and active referral of agents to the Institute website..
- 5.8 The Institute will not accept students from an education agent or enter into an agreement with an education agent if it knows or reasonably suspects the education agent to be:
- engaged in, or to have previously been engaged in dishonest practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Transfer between registered providers)
 - facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa
 - using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment other than bona fide a student, or
 - providing immigration advice where not authorised under the Migration Act 958 to do so.



5.9 Where the Institute has entered into agreement with an agent and subsequently becomes aware of or reasonably suspects, the agent or sub-contractor of that agent, of the conduct set out in Standard 4.3 (see dot points above), the Institute will terminate the agreement with the education agent. This does not apply if an individual employee or sub-contractor of the education agent was responsible for the conduct set out in 4.3 and the education agent has terminated the relationship with that individual employee or sub-contractor.

5.10 The Institute will take immediate corrective and preventative action upon becoming aware of an education agent being negligent, careless or incompetent or being engaged in false, misleading or unethical advertising and recruitment practices, including practices that could harm the integrity of the Australian education and training system.

Preventative action could include training sessions for agents, ensuring they have all the material they need to represent the provider accurately and professionally.

Corrective action may include providing additional information/material or targeted training in, for example, the expectations of the provider. Corrective action may also include termination of the agreement with the education agent.

5.11 The Institute will terminate the agreement with an agent if the agent engages in dishonest practices contrary to the National Code and ESOS legislative requirements.

A list of the Institutes agents can be found on its Oxford website at <http://www.oxfordhe.edu.au/services/agents/>