

Policy Title

Agent (Educational Advisor) Management Policy

Preamble

This policy complies with:

- The Migration Act 1958 and Migrant Regulations 1994 as updated;
- The Education Services for Overseas Students Act 2000 (ESOS Act);
- The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018).

Purpose

Educational Advisors (agents) play an important role in recruiting overseas students for Deakin College. Deakin College works collaboratively as part of the wider Navitas Group of Higher Education Colleges and within a joint management system of educational advisor management and quality assurance. This policy is linked to the Navitas policies, procedures and required agent management documentation. It has been developed to ensure that agents or Educational Advisors act ethically in the best interest of overseas students.

Scope

This Policy applies to Deakin College Marketing and Admissions Staff and Educational Advisors with the authority to promote Deakin College's programs and services to prospective overseas students.

Policy

1. Appointment of Educational Advisors

- 1.1.** The appointment of Educational Advisors for prospective Deakin College overseas students complies with the ESOS Act and the National Code as all Educational Advisors appointments by Navitas comply with reciprocal laws and regulations in Canada, Singapore, and United Kingdom when appointing and managing its Educational Advisors.
- 1.2.** Appointed Educational Advisors have appropriate qualifications as well as knowledge and understanding of the overseas education system in Australia, including the Australian International Education and Training Agent Code of Ethics, the ESOS Act, National Code of Practice and immigration regulations.
- 1.3.** Navitas on behalf of Deakin College enters into a written agreement with each Educational Advisor it engages. The agreement specifies the responsibilities of the Educational Advisor and Navitas (Deakin College) and the need to comply Australian ESOS Act and the National Code. The agreement also includes:
 - A process for Educational Advisor selection and review;
 - A process for Educational Advisor monitoring;
 - Corrective and preventative actions; and
 - Termination conditions.

1.4. Deakin College will not accept Educational Advisors who:

- engage in dishonest recruitment practices;
- create enrolment in PRISMS for non-bona fide students or students they know will not comply with their visa conditions; and/or
- Educational Advisors not acceptable to other Navitas Colleges or Deakin University.

2. Responsibilities of the Deakin College Recruitment and Marketing Team

- 2.1.** The Deakin College Director Marketing and Admissions and staff members (The Deakin College Team) work as an integral part of the wider Navitas Educational Advisor (Agent) management system and participate in overall management and compliance as delegated including interviewing Educational Advisors at on-shore and overseas fairs and conferences and monitoring the performance of designated agents.
- 2.2.** The Deakin College team ensures that Educational Advisors promoting Deakin College courses to overseas students are provided with up-to-date course information and marketing materials and have their current contact details listed on the Deakin College website.
- 2.3.** The Deakin College Team monitors overall agent performance and responds promptly to student complaints and or other avenues through which they become aware of agent non-compliance with their agreement.
- 2.4.** A Deakin College Agent (Educational Advisor) Management audit and review is conducted on an annual basis. The audit will identify all Deakin College agents, those reviewed and any complaints reported. If there are findings that suggest breach of contract, the termination clause will be activated by Navitas.

Related Policies

- Admission Policy
- Marketing Policy
- The Navitas Educational Advisors Management Policy and Procedures

Related Documentation

- Navitas Educational Advisor Expression of Interest Form
- Navitas Educational Advisor Due Diligence Checklist & Questionnaire
- Navitas Educational Advisor Details Form
- Navitas Educational Advisor Agreement and Terms & Conditions
- Channel Partner Management Guide

Procedure

- Agent (Educational Advisor) Management Procedure

Definitions

Key Terms or Acronym	Definition
Prospective Student	A person who intends to become, or who has taken any steps towards becoming a student, an 'overseas Student' or 'intending overseas Student'

	as defined by any laws and regulations applicable to Australia, Canada, New Zealand, Singapore, the United Kingdom, Germany, the United States of America, United Arab Emirates, and the Netherlands.
Student	A person who holds a Student Visa and is an 'overseas Student' as defined by the applicable regulation in Australia, Canada, New Zealand, Singapore, the United Kingdom, the United States of America, United Arab Emirates, Germany, and the Netherlands; or a person who holds a Permanent Residency in those countries and applies to study at Navitas through an Educational Advisor.
Educational Advisor	A person or an organisation with the authority to promote Navitas college's programs and services to prospective students or students in nominated territories.
Educational Advisor Expression of Interest	The Expression of Interest form is issued by Account Managers, marketing or admissions staff on behalf of Navitas. The form is used to evaluate an Educational Advisor's suitability to represent the group.
Educational Advisor Agreement and Agreement Terms & Conditions	The official agreement issued by Navitas includes terms and conditions that apply to all appointed on-shore and off-shore Educational Advisors, covering all entities of the group in Australia, Canada, New Zealand, Singapore, the United Kingdom, the United States of America, United Arab Emirates, Germany, and the Netherlands (Educational Advisor agreements are reviewed annually with a duration of 1 or 3 years depending on the service level of the agreement).
Educational Advisor Agreement Paragraph 'E'	Paragraph 'E' of the agreement states "Navitas may terminate this agreement at any time and with immediate effect by giving notice to the Educational Advisor" (generally applied where the Educational Advisor breaches any provision of the Agreement).
Educational Advisor Certificate	The official certificate of representation for the Educational Advisor to represent the Navitas group.
Navitas Educational Advisor Code	The official code issued by the Channel Partner Services Team for use on the respective Student Administration database.
Educational Advisor Agreements may be 12 or 36-months	The length of service and engagement agreed between Navitas and the Educational Advisor, as specified in the Educational Advisor's agreement.
Criteria	Navitas will engage in a formal written agreement with an Educational Advisor where they meet the criteria, assessed using a variety of measures including: <ul style="list-style-type: none"> a) Information recorded on the Navitas Educational Advisor Expression of Interest form. b) Due Diligence and Questionnaire Form, which includes a risk assessment. c) Positive referee reports.

	<p>d) Clear sanction screening results.</p> <p>e) The Advisor agreeing to comply with its stated responsibilities.</p> <p>f) The Advisor agreeing to fulfil the requirements of any laws and regulations applicable in Australia, Canada, New Zealand, Singapore, the United Kingdom, the United States of America, United Arab Emirates, Germany, and the Netherlands.</p>
Navitas Educational Advisor Identifier (client code)	The official and unique identifier code generated in the database (Salesforce) by Channel Partner Services, used to identify each Educational Advisor’s account in the database.
CRICOS	The Australian Commonwealth Register of Institutions and Courses for Overseas Students, as amended from time to time.
ESOS	The Education Services for Overseas Students Act 2000 of the Commonwealth of Australia, as amended from time to time.
National Code	The Australian National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students, established pursuant to the ESOS Act, as amended from time to time.

Status and Details

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Implementation Officer	Director Marketing & Admissions
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