

## GCA Education Agent Monitoring Policy

### Context

This policy ensures that Group Colleges Australia (GCA) has documented procedures and guidelines regarding the monitoring of partner education agents. Its purpose is to ensure that GCA appoints only those education agents who have demonstrated honest and ethical business practices and who will uphold the reputation of GCA and the Australian international education sector.

### Rationale

GCA is committed to ensuring that it meets the requirements of the Education Services for Overseas Students Act 2000 (Cth) (ESOS) and National Code of Practice for Registration Authorities and Providers of Education to Overseas Students 2018 (National Code).

### Scope

This policy applies to all staff responsible for the management of GCA education agents.

### Definitions

**Education Agent:** relates to a person or organisation who is engaged by GCA to recruit students and has a written agreement with GCA with terms and conditions relating to the scope of the agent's promotional activities, commissions and so on, and is formally representing GCA.

**MyGCA:** a web-based college administration system, providing an easy online service from any computer around the world for all stages of an educational pathway, from initial inquiry, to enrolment and final graduation.

### Procedure

The GCA Admissions Centre provides the guidelines by which agents are monitored to ensure they operate in accordance with Standard 4 of the National Code. This policy is applied to all GCA partner education agents. The GCA Admissions Centre will carry out the following actions to manage and monitor agents:

- i. **Select and recruit education agents:** all education agents interested in representing Group Colleges Australia must submit an 'Agency Application Form' including business information and referees, as well as certified business registration and education industry affiliations such as QEAC (Qualified Education Agent Counsellor) certificates.

#### Actions:

- A GCA Marketing Manager will facilitate the potential education agent with an **Agency Application**.
- Once an agent submits the application, this is thoroughly checked, as well as the additional documents submitted (as per in agency application). A background check is also carried out and Marketing Managers will use one or more of the following methods to ensure demonstrated knowledge and understanding of the requirements of the ESOS Act and National Code:

- contact referees provided by the Agent by email
- contact referees provided by the Agent by phone
- contact known educational or business partners that the Agent has worked with in the past
- contact known students that the Agent has recruited in the past
- review the Agent's social media profiles and website
- check the ABN or ACN provided by the Agent using the Australian Business Register (ABN Lookup) website if it's an onshore agent, making sure the ABN or ACN covers the agency name
- check the Migration Agent Registration Authority database of Registered Migration Agents
- check the Pier Online database of Qualified Education Agent Counsellors
- review information provided in the Agent Application form
- conduct a web search for the Agent and review any feedback or other related content that has been posted online.

The **Agency Application** will be uploaded to the Agent's Journal together with any supporting documents submitted. If a referee is contacted an **Agent Reference check report (referees)** will be filled out and uploaded to the Agent's Journal. If no referee is available, an **Agent Reference check report (other)** will be completed and uploaded to the Agent's Journal.

After all the above steps have been fulfilled, the Marketing Manager will create an online agency account in MyGCA for the agents and send them a welcoming information pack including:

- MyGCA account login and temporary password
- MyGCA User Guide
- Web links to websites and marketing material
- Web links to ESOS Act and National Code

- ii. **Establish an agency agreement:** all education agents engaged by Group Colleges Australia are required to enter into an agency agreement. This agreement will specify the responsibilities and undertakings of both parties in accordance with the National Code and the ESOS Act. The agency agreement is accepted by the agents online through MyGCA.

**Actions:**

- Once an agency application has been approved and a representative agent has access to MyGCA they will be able to accept the terms and conditions of the Agency Agreement online through MyGCA.
- Marketing Managers need to follow up with new agents to ensure that they are able to access their account and accept the agreement. This is actioned within the first week after a MyGCA agency account is created.
- Accepting the agreement is part of the agent registration process. Student applications will not be able to be submitted until the agreement is accepted by the agent.

- iii. **Gather student feedback:** Group Colleges Australia conduct Agent Surveys with its students and use the feedback to identify issues related to agent's conduct and interaction with the students.

**Actions:**

- The Business Development & Admissions Director carries out Agent Surveys periodically.
- In the case of negative feedback submitted anonymously related to student satisfaction with agents, the Business Development & Admissions Director will communicate the entire student body within 15 days with information on how to approach the GCA Admissions Centre to resolve agency related issues.

- Any agents who are identified by the Business Development & Admissions Director and proven through the surveys to be acting unethically or in breach of the Agency Agreement may be contacted first by the respective Marketing Managers. A Corrective Action Sheet – Agent will need to be filled out for each of the agents by the respective Marketing Manager and then approved by the Business Development and Admissions Director. Corrective actions may include providing additional information to the agents and targeted training, written warnings and ultimately, if deemed necessary, terminations of the agreements.
- Students who visit the GCA Admissions Centre are continuously requested for feedback regarding their relationship with their agents. Any complaint received through this channel is discussed with the agent and if found in breach, the agency agreement may ultimately be terminated.

iv. **Communication with agents:** constant and open communication with education agents is a very important function of GCA Admissions Centre. Our Marketing Managers communicate with agents regularly via email, telephone, video-conferencing and in person through agent visits. GCA monitors and ensures all agents are compliant with their agency agreement and the National Code by utilising all the measures mentioned above. These activities focus on monitoring, training, customer relationship building, information updates and ensuring agents have access to the latest marketing material available on the website.

**Actions:**

- Based on their market, agents are distributed among the GCA Marketing Managers. Marketing Managers communicate directly with their respective agents via email, phone, in person, videoconference and/or through the Broadcast Module in MyGCA.
- It is the responsibility of each Marketing Manager to ensure that agents are monitored every year and that they have access to and are knowledgeable about updated physical marketing material. After each visit an Agent Visit Checklist must be filled out and uploaded in the Agent's Journal. The Agent Visit Checklist is an agency monitoring tool used by GCA.
- It is the responsibility of the Business Development & Admissions Director to communicate general news and updates to all agents. These communications are actioned through the Broadcast Module in MyGCA. All these types of communications are logged in MyGCA.

v. **Monthly agent performance reports:** through MyGCA, the Business Development & Admissions Director runs Refund Requests reports on a monthly basis. This report will help in identifying agents with a high visa refusal rates or other identified factors (systemic or otherwise). Based on this report agents will be sent a warning or termination of agreement notice.

**Actions:**

- The Business Development & Admissions Director extracts and compiles the agent performance report on a monthly basis from MyGCA, then sends it to all Marketing Managers.
- It is the responsibility of the Marketing Managers to contact agents, send warnings or terminate agreements as per the performance report.

vi. **Annual Agent Performance report:** a comprehensive agent performance analysis is compiled by the Business Development & Admissions Director in a report which will help in identifying enrolment activity, CoE incompleteness rates, student academic performance, visa refusal rates and other agent management parameters.

**Actions:**

- The Business Development & Admissions Director extracts and compiles the agent performance report on a yearly basis from MyGCA, then sends it to all Marketing Managers.
- It is the responsibility of the Marketing Managers to contact agents, send warnings or terminate agreements as per the performance report.

Any breach of the conditions stipulated in the Agency Agreement (Section 9) will result in the termination of the agency agreement.

**Warnings & Terminations**

Any breach of the conditions stipulated in the GCA Agency Agreement will result in the termination of the agency agreement. It is the responsibility of the Business Development & Admissions Director to send reports/requests to Marketing Managers to action agency warnings and terminations. Warnings and Terminations are implemented based on students' complaints, negative feedback, performance reports and any breach of the Agency Agreement. Any enquiries submitted by a student whose agent has their agreement terminated will be dealt directly by GCA Admissions Centre.

**Legislative Context**

- Education Services for Overseas Students Act 2000 (Cth)
- The Education Services for Overseas Students Regulations 2001 (Cth)
- The Migration Act 1958 (Cth)
- The Migration Regulations 1994 (Cth)
- National Code of Practice for Registration Authorities and Providers of Education to Overseas Students 2018 (National Code) and
- Any other legislation or regulations relevant to the provision of education to overseas students in Australia.

**Related Documents**

- GCA Agent Agreement
- GCA Agent Management Policy

**Version Control and Accountable Officers**

Policy Category	GCA		
Responsible Officer	Business Development and Admissions Director		
Review Date	January 2022		
Approved By	EMT		
Previous Version/Date	V9		January 2021
<b>Version</b>	<b>Authored By</b>	<b>Description of Changes</b>	<b>Approved By</b>
001	AK	New template <sup>1</sup>	EMT March 2021

<sup>1</sup> Note the new template was approved by the EMT 4 March 2021