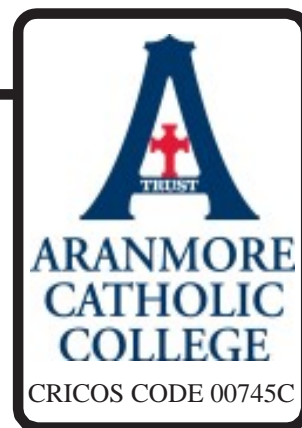


AGENTS



Principles: Aranmore Catholic College recognises:

- that as a Catholic educational institution, it places the highest value on ethical and honest practices in all its dealings with others
 - the interests of the student transcend all business considerations
 - that it must take all reasonable measures to ensure its agents are well informed as to their obligations under the ESOS Act
 - that it must take all reasonable measures to ensure that its agents act with honesty and integrity
 - that the use of agents may involve the acceptance of additional liabilities arising from the actions of its contracted agents
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- that the College must actively scrutinise any agents prior to their appointment

Procedures:

1. The initial application for appointment as an approved agency will require the provision of a minimum of two references by other registered education providers within Australia for whom the agent is presently contracted.
2. The duration of all such appointments in the first instance will be for a period of one year with the possibility of extension for an additional year. Where agents demonstrate their reliability, then an appointment may be made for a maximum term of three years. The termination date and renewal provisions will be stated in the contract.
3. Agents are required to provide a written assurance that they understand and will abide by the requirements of the ESOS Act and the National Code (2007). In addition, as a matter of principle, the College will give preference to those agents able to demonstrate proficiency as an education agent or a migration agent by way of certification such as the 'pieronline' website.
4. Agents will be notified in writing via the Agency Agreement Contract that the work of the agency will be reviewed from time to time and that the contract has provisions to suspend or terminate the appointment of any agent with due cause. Suspension or termination of appointment will result when and if the College 'reasonably suspects' or has 'grounds for believing' that the agent or a person acting on the agent's behalf as a 'sub-agent' is failing to abide by the provisions or intentions of the National Code or demonstrated incidents of:
 - negligence
 - carelessness
 - incompetence
 - dishonest practices
 - false, misleading or unethical advertising
 - false, misleading or unethical recruitment practices
 - practices that could harm the integrity of Australian education and training
5. Agents will be notified that 'inactivity' is grounds for agency agreement termination. Inactivity will mean that the agency has failed to provide any student referrals during the duration of the agency agreement.

6. The College will expect an annual written report outlining the activity of the agent on the College's behalf. This will invite the agent to identify any aspect of the College/Agent relationship that requires attention or improvement.
7. The College will maintain an up-to-date list of approved agents published on its website.
8. The College will inform agents of its expectations and obligations relating to approved agents.
9. The College will inform parents and students of its relationship with agents, especially the payment of commissions so as to avoid agents 'double charging' the College and the student. This also highlights the potential for any 'conflicts of interest'.
10. Provision will be made in those markets where it is normal practice for an agent to recoup certain 'processing costs' such as postage, fax, telephone, photocopying, and/or courier service. Such costs must be of an amount less than \$500.
11. The College will regularly update its agents by way of electronic communication and/or agents information and training seminars.
12. The College will ensure that all registered agents have been provided with up-to-date and accurate marketing information. This will normally be done by way of electronic communication such as email.
13. The majority of overseas students come to the College by way of family members, agents acting on behalf of the student and/or parent or other informal contact from agents. When a person makes repeated referrals to the College, then the College will seek registration from that person as an approved agent.
14. The College will monitor the activity of its approved agents through activities such as:
 - student and/or parent formal or informal feedback
 - face-to-face meetings for onshore or offshore agents where possible
 - telephone/teleconferencing meetings
 - informal or formal annual reports by agents
15. The College will not enter into an agreement, nor accept students from any agent where the College knows or reasonably suspects the 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 obligation of registered providers under Standard 7 of the National Code (Transfer Between Registered Providers)
 - facilitating the enrolment of a student who the agent believes will not comply with the conditions of his or her student visa
 - using Provider Registration and the International Students Management System (PRISMS) to create Confirmations of Enrolment (CoE) for other than bona fide students
 - providing immigration advice where not authorised to do so under the Migration Act 1958