



Charles Sturt
University

Charles Sturt University

International Agent Guidelines

For further information please contact
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1. Overview

International agents play a significant role in supporting Charles Sturt University's international student recruitment strategies by providing a physical presence and representation in Australia and overseas.

Agents are often the first point of contact for prospective international students and their parents. They are expected to assess prospective international student suitability for study in Australia and the respective university in compliance with student visa legislation and regulation; guide prospective international students in the process of applying for admission, accepting an offer, and gaining a student visa; and prepare international students for living and studying in Australia.

These guidelines are to be read in conjunction with the International Agent Agreement and apply to all agents contracted by Charles Sturt.

The purpose of these guidelines is to provide a range of advice and guidance on what would be best practice. It is intended as advice to international agents in the application of the International Agent Agreement, and to clarify options or considerations that may assist international agents in carrying out its obligations.

Please note that defined terms in these guidelines have the corresponding meaning as in the International Agent Agreement.

2. International Agent Guidelines

1. Legislation and regulatory regime

1.1 Pursuant to the International Agent Agreement, the international agent must comply with a range of prescribed legislative and regulatory requirements. To assist the international agent in complying with these obligations, the international agent should:

- 1.1.1 implement systems to keep informed of, and at all times comply with the current requirements from time to time of the ESOS Framework and other such laws and obligations relevant to the delivery of the services;
- 1.1.2 implement systems to at all times keep informed of, and at all times comply with the legal and regulatory conditions for student visa requirements which may change from time to time, available at www.homeaffairs.gov.au/;
- 1.1.3 promptly advise Charles Sturt University in writing regarding the existence and any relevant requirements of any law, regulation, rule or practice in the Territory with which Charles Sturt University must comply, or with which the international agent must comply on Charles Sturt University's behalf in the delivery of the Services, where the failure to comply by Charles Sturt University or the international agent may lead to a legal claim or action against Charles Sturt University or the imposition on Charles Sturt University of a fine,

compensation or other penalty or may damage the reputation of Charles Sturt University; and

- 1.1.4 take reasonable steps to ensure that all staff member or any approved subcontractors of international agents are aware of their obligations under the International Agent Agreement and understand the potential implications for any breach of such obligations.

2. International agent registration

- 2.1 Before the commencement date of the International Agent Agreement, the international agent should provide Charles Sturt University with its details including:

- 2.1.1 legal entity name and status of the International Agent (for example, company or individual);
- 2.1.2 trading name of the international agent and whether it is a registered trading name;
- 2.1.3 an Australian Business Number or Australian Company Number (if applicable);
- 2.1.4 contact details of the international agent street and postal address, email, telephone, facsimile, website;
- 2.1.5 any relevant memberships and registrations of the business including international agents' associations, industry and regulatory bodies; and
- 2.1.6 a statement on whether the international agent has previously been refused registration by the designated Australian authority or any designated authority (and, if so, the name of the designated authority) and reasons for refusal.

- 2.2 The international agent should keep Charles Sturt University informed at all times of any changes to the above details during the term of the International Agent Agreement.

3. Marketing information and practices

- 3.1 Charles Sturt University will nominate a contact person for the purposes of correspondence, communication, contact and liaison with the International Agent on behalf of Charles Sturt University, including on issues relating to prospective international student applications, offers and acceptances, training, payment of fees and the international agent fee, planning of promotional visits, seminars, exhibitions and advertising.
- 3.2 Charles Sturt partner institutions are responsible for providing International Agents with specific information about Charles Sturt University programs delivered at their institutions.

- 3.3 When complying with its marketing and recruitment obligations pursuant to the International Agent Agreement, the international agent should ensure that it:
- 3.3.1 obtains prior approval for, and keep Charles Sturt University informed of all the international agent's promotional and marketing activities, including those which are connected to or make reference to the courses or Charles Sturt University or include the use of Charles Sturt University's name and logo in agency material. Approval is to be sought from Charles Sturt International Marketing at internationalclient@csu.edu.au;
 - 3.3.2 is sensitive to the cultural and political background of prospective international students and is aware of their historical, political background and education systems;
 - 3.3.3 is knowledgeable, experienced and competent in the administration of student policy and in personal dealings with prospective international students;
 - 3.3.4 promotes Charles Sturt University accurately in terms of quality of education and course locations for example, prospective international students should be informed of selection criteria in order to help predict success rate and maintain Charles Sturt University's academic standard; and
 - 3.3.5 does not bring Charles Sturt University and/or the industry into disrepute, which includes (but is not limited to):
 - not making exaggerated claims for the services they are able to offer, the qualifications they possess or the experience they have gained;
 - not making disparaging references or unsubstantiated comparisons to the work of others;
 - not creating false, misleading, deceptive or unjustified expectations of favourable results;
 - not implying the ability to influence any court, tribunal, regulatory agency or similar body or official;
 - not containing misrepresentations that are likely to cause damage to the business or goodwill of a competitor;
 - not portraying people or depict material in a way that discriminates or vilifies a person or section of the community on account of race, ethnicity, nationality, sex, age, marital status, sexual preference, religion, disability or political belief;
 - not containing inappropriate language or strong or obscene language;
 - not containing testimonials, endorsements or any other representations that would be likely to cause a reasonable person to misunderstand or be deceived;
 - not making unjustified claims to be an expert or specialist in a particular field.
 - not omitting or obscuring information required to be included where

such omission or obscurity would be misleading, or give false or misleading information or advice in relation to:

- the employment outcomes associated with a course;
- automatic acceptance into another course;
- possible migration outcomes; or any other claims relating to Charles Sturt University or Charles Sturt University's partner institutions, its courses or outcomes associated with the course.

4. International agent training

- 4.1 Following signing of the International Agent Agreement with Charles Sturt University, all international agents who have not previously had an International Agent Agreement with Charles Sturt University must undertake training with Charles Sturt University. Where possible, this training will be conducted in person or via Skype. Charles Sturt University will make available a suite of documents to the international agent.
- 4.2 International agents must engage in ongoing training, as provided by Charles Sturt University from time to time. Charles Sturt University uses a number of communication methods to advise international agents of any significant changes to the information provided in the initial international agent training relevant to international agents' recruitment of Prospective International Students to Charles Sturt University.

5. Pre-enrolment engagement with students

- 5.1 To comply with its obligations pursuant to the International Agreement in regard to engaging prospective international students, the international agent should take reasonable steps to:
- 5.1.1 advise prospective international students that they are required to provide Charles Sturt University with their ordinary home address, address for correspondence and email address (not the international agent's address);
 - 5.1.2 ensure that only certified true copies of original documents are submitted with prospective international students' applications;
 - 5.1.3 implement systems to monitor and measure the level of service provided to prospective international students or international students to ensure appropriate levels of prospective international student and international student satisfaction;
 - 5.1.4 maintain any premises or facility from which the services are provided in a manner that ensures the health and safety of prospective international students and international students and stores international student files in a secure storage system so as to comply with its privacy obligations pursuant to the International Agent Agreement;

5.1.5 possess relevant knowledge and available information on the following:

- Student visa processing arrangements.
- Australian living/culture:
 - travel information;
 - transport information;
 - realistic information on the availability of part-time work;
 - the totality of finances required for study in Australia, i.e. study obligations, tuition fees, living costs, transport, book and equipment requirements and costs of using other facilities such as computers or medical etc; and
 - the availability of Australian Government scholarships (if applicable).
- Charles Sturt University Information:
 - campus locations (or Charles Sturt Partner Institution locations) and a general description of facilities, equipment, and learning and library resources available to International Students;
 - accommodation options;
 - student amenities fees including applicable refund policies;
 - information about the grounds on which the International Student's enrolment may be deferred, suspended or cancelled and the availability of complaints and appeals processes;
 - for Charles Sturt University courses offered at Charles Sturt partner institution locations international agents must inform prospective international students about the similarities and differences, and the nature of the partnership; and
 - available Charles Sturt Scholarships and how to apply (if applicable).
- Course Information:
 - indicative course tuition fees and payment options;
 - possible additional costs for practicums or placements (as outlined in the online course brochures);
 - the requirements for acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required and whether course credit may be applicable. This information can be found in Charles Sturt publications and online: study.csu.edu.au/international or if further clarification is required international agents should contact Charles Sturt International Marketing team at internationalclient@csu.edu.au
 - the course content and duration, qualification offered, modes of study and assessment methods (as outlined in the online course brochures).

- Application and admissions Information:
 - assist Prospective International Students to apply for admission. This involves assisting the prospective international student to complete the application form, but must not involve completing the form on the prospective international students' behalf;
 - ensure prospective international students provide their home address and email address on their application form (i.e. not that of the International Agent);
 - assist prospective international students to arrange IELTS testing if required;
 - ensure only certified true copies of original documents are submitted with applications. Charles Sturt University prefers that International Agents certify these, however it is also possible to accept certified true copies from other acceptable sources; and
 - ensure compliance with the Australian *Privacy and Personal Information Protection Act 1998* which requires international agents to **only** release details about a prospective international student or international student to Charles Sturt University. Information must not be released to a support family member or friend unless written approval has been provided by the prospective international student or international student.
- Accepting an offer of admission and payment of fees:
 - Assist prospective international students to understand the terms and conditions of the offer (including refund policy, overseas health cover, conditions of offer, payment of upfront fees by required date, etc) and how to accept their offer and make payment of their fees;
 - International students must pay fees directly to Charles Sturt University (not to the International Agent); and
 - Acceptance of offer and payment of fees processes and other important information is outlined online: [my- offer.csu.edu.au/](https://my-offer.csu.edu.au/)

6. Student visa processing

- 6.1 While it is the responsibility of the international agent to inform themselves and keep themselves informed of the current regulatory requirements for visa processing, Charles Sturt University will use reasonable endeavours to notify all International Agents in writing of any changes to the visa requirements for studying in Australia as soon as practicable after it becomes aware of the changes.
- 6.2 To comply with its obligations pursuant to the international agreement in regard to processing prospective international students, the international agent should take reasonable steps to:
- 6.2.1 implement systems to at all times keep informed of, and at all times comply with the legal and regulatory conditions for International Student Visa requirements which may change from time to time, available at www.homeaffairs.gov.au;

- 6.2.2 comply with any updates that may be issued by Charles Sturt University from time to time relating to compliance with International Student Visa processing legislation and regulation;
- 6.2.3 ensure that low rates of visa refusal or visa cancellation are achieved by undertaking the appropriate steps to ensure that the prospective international student is a Genuine Temporary Entrant (GTE) with the primary intention to study, to complete the course offered and also has the means to finance the tuition and the living costs involved;
- 6.2.4 be aware that it is the international agent's responsibility to ensure they are recruiting genuine and quality international students to Charles Sturt University;
- 6.2.5 be aware that frequent visa rejections and/or visa cancellations in respect of International Students who have been recruited by the international agent may result in termination of the International Agent Agreement with Charles Sturt University, or Charles Sturt partners;
- 6.2.6 ensure that all applications are complete before they are submitted to the department for visa processing. Incomplete applications may result in visa rejections;
- 6.2.7 ensure that the eCoE accompanies all visa applications. Applications must not be submitted with a letter of offer rather than an eCoE. Any applications submitted to the department with a letter of offer rather than an eCoE will be assessed under the old Visa processing arrangements which may result in delayed turnaround time and Visa rejections;
- 6.2.8 notify Charles Sturt University of any and all refused or cancelled visas for Prospective International Students on whose behalf the International Agent has been acting. Notification to Charles Sturt University is to include a copy of the decision record and must be provided to internationaladmiss@csu.edu.au within seven (7) days of the agent's receipt of the decision; and
- 6.2.9 once Confirmation of Enrolment (COE) is issued by Charles Sturt University it is expected that the applicant attends classes from the day shown on start date in the offer. If the student is not able to commence on this date, the agent will need to seek approval for late start from international support team of this at international@csu.edu.au

7. Agency staff capability, educational resources and premises

- 7.1 To comply with its obligations pursuant to the International Agent Agreement, the international agent should take reasonable steps to ensure that:
 - 7.1.1 the staff of the international agent must be suitably qualified or experienced in relation to the functions they perform for international students;

- 7.1.2 the international agent must have and implement policies and procedures to ensure its staffing resources are adequate; and
- 7.1.3 the international agent notify international students registered with the international agent of any intention to relocate premises at least 20 working days before the relocation.

8. Monitoring of international agent's activities

- 8.1 To comply with its obligations pursuant to the International Agent Agreement in regard to Charles Sturt University monitoring the international agent's performance of its obligations under the International Agent Agreement, the international agent acknowledges it will cooperate fully with Charles Sturt University including providing access to the International Agent's premises, records, accounts and personnel for the purpose of inspection, review and audit.

9. Complaints by the International agent against Charles Sturt University

- 9.1 In the event that the international agent wishes to lodge a concern or a complaint (which is not a dispute under the International Agent Agreement) against Charles Sturt University, the international agent may:
 - 9.1.1 lodge a written complaint with the Charles Sturt Business Developing Office via email to: internationalclient@csu.edu.au.
- 9.2 Upon receipt of the complaint, Charles Sturt University will seek to acknowledge receipt of the complaint within three (3) working days.
- 9.3 The Business Developing Office will investigate the complaint including a written explanation from the relevant departmental supervisor or manager. In the event that the complaint relates to the Business Developing Office, the Office of Student Administration will investigate the complaint.
- 9.4 Charles Sturt University will seek to resolve the complaint within two (2) weeks of receipt of the complaint by:
 - 9.4.1 contacting the complainant to discuss the concerns or complaint and seek a resolution;
 - 9.4.2 writing to the complainant with an explanation or response or acknowledging the concern (if an acknowledgment is all that is required);
 - 9.4.3 advising the complainant that an investigation will be conducted into the concerns or complaint (and the complainant advised of the outcome if this is requested); or
 - 9.4.4 some other response suitable to the resolution of the concern or complaint.