

## P60 Agent Monitoring and Termination Procedure

### 1.0 Purpose

- 1.1 This procedure explains the process of monitoring and terminating education agents who are cooperating with Baxter Institute to recruit students. The education agents are often the first point of contact between prospective students and the Australian international education industry. Their activities and ethics are important to Australia's reputation as a desirable destination for students. Baxter Institute is therefore committed to ensuring its agents act ethically and appropriately.
- 1.2 This procedure is to ensure Baxter Institute's compliance with Standards for Registered Training Organisations (RTO) 2015, Standard 7.

### 2.0 Scope

This procedure applies to:

- 2.1 Authorised Education Agents of the RTO; and
- 2.2 Staff of the RTO and partner providers involved in the appointment, accreditation and monitoring of Education agents for the RTO.

### 3.0 Definitions

- 3.1 **Accepted Student** means accepted student of a registered provider (Student) means a student (whether within or outside Australia):
  - who is accepted for enrolment, or enrolled, in a course provided by the provider; and
  - who is, or will be, required to hold a student visa to undertake or continue the course.
- 3.2 **Agent Agreement** means Agreement between the RTO and the agent including the schedules.
- 3.3 **Compulsory Study Period** means a period of study in which the student must enrol unless granted a deferment or suspension from enrolment or leave of absence under Standard 9 (Deferring, suspending or cancelling the student's enrolment). A compulsory study period does not include periods in which the student can elect to undertake additional studies.
- 3.4 **Course** means the fulltime registered University or vocational education and training courses or ELICOS courses offered by or through Baxter and registered on Registered Providers CRICOS scope of registration.
- 3.5 **Confirmation of Enrolment (CoE)** means an official document that provides important information about an international student's enrolment status. This document is required to be submitted to the Department of Home Affairs before applying for a student visa.
- 3.6 **CRICOS** means the Commonwealth Register of Institutions and Courses for Overseas Students.
- 3.7 **CUP** means the Centre for Partnerships
- 3.8 **Education Agent** means a person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers. Education agent does not refer to an education institution with whom an Australian provider has an agreement for the provision of education (that is teaching activities).
- 3.9 **Enrolment** means where the student has been issued with a CoE to confirm acceptance by the registered provider and is occupying a place in the CRICOS registered course for which the student was accepted and is progressing towards the completion of the course requirements. The period of enrolment includes scheduled breaks between study periods.

- 3.10 **ESOS Act** means the Education Services for Overseas Students Act 2000 revised 2017 of the Commonwealth of Australia.
- 3.11 **ESOS** means the Regulations:National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)
- 3.12 **Full time study** means the amount of study for a particular Course which is approved by the accrediting body for the Course, or in cases where the accrediting body gives no such approval, means minimum of 20 contact hours per week.
- 3.13 **Genuine Student** means an applicant that intends to obtain a successful educational outcome and has the language, education and material background to have a reasonable chance of achieving this educational outcome
- 3.14 **Genuine Temporary Entry (GTE)** means an applicant that has circumstances to support a genuine intention to enter and stay in Australia temporarily, notwithstanding the potential for this intention to change over time to an intention to utilise lawful means to remain in Australia for an extended period or permanently.
- 3.15 **Mode of Study** means the attendance including face-to-face in a classroom, supervised study on the registered provider's campus, distance learning, online learning and work-based learning.
- 3.16 **National Code** means the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students.
- 3.17 **Overseas Student** means a person (whether within or outside Australia) who holds a student visa as defined by the ESOS Act but does not include students of a kind prescribed in the ESOS Regulations. Where the student is under 18 years of age and the student is required to exercise rights or enter obligations as a legal person, this term may refer to the student's parent or legal guardian.
- 3.18 **Partner Provider** means the Educational institution providing programs and courses to a University through an approved education agreement.
- 3.19 **Principal Course of Study** means the principal course of study that refers to the main course of study to be undertaken by an overseas student where a student visa has been issued for multiple courses of study. The principal course of study would normally be the final course of study where the overseas student arrives in Australia with a student visa that covers multiple courses.
- 3.20 **PRISMS** means the Provider Registration and International Students Management System (the electronic system that holds CRICOS course and provider registration details and the electronic Confirmation of Enrolment).
- 3.21 **Prospective Student** means an intending overseas student (whether within or outside Australia) who intends to become, or who has taken any steps towards becoming, an overseas student
- 3.22 **Recruitment** means the pre-enrolment processes of engaging and assisting overseas students (or parent or guardian if the overseas student is under 18) to apply for a place in a course with a provider leading up to the formal enrolment, including assistance with administrative issues and the issuing of a Confirmation of Enrolment for an application for a student visa;
- 3.23 **Registered Training Organisation (RTO)** means the Registered training organisations (RTOs) are providers and assessors of nationally recognised training that have been registered by the Australian Skills Quality Authority (ASQA).
- 3.24 **Relevant Legislation and regulatory instruments** means
- The Education Services for Overseas Students Act 2000
  - National Vocational Education and Training Regulator Act 2011 (the Act)
  - National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)

- Standards for Registered Training Organisations (RTOs) 2015
- Student Identifiers Act 2014
- The Migration Act 1958
- The Migration Regulations 1994
- Any other legislation or regulations relevant to governing the provision of education to overseas students in Australia.

#### 4.0 **Actions**

Actions required to meet this procedure are outlined in the following sections:

##### 4.1 Agent Audit.

- 4.1.1 The performance of agents will be reviewed by the RTO or, as applicable, the Compliance Manager annually using the Agent Audit checklist (MK268). Audit dates must be recorded on the In-File Agent Checklist.
- 4.1.2 The RTO will consider the performance of the agent to decide whether to:
  - Maintain the agent's appointment;
  - Appoint the agent for a further period subject to certain conditions; or
  - Terminate the agent's appointment in accordance with Termination of an Agent within this Procedure.
- 4.1.3 In considering the performance of the agent under Item 2, the RTO will consider:
  - the agent's compliance with the Agent Agreement and any conditions placed on the agent by the RTO;
  - the number of students the agent has recruited and the conversion rate of:
    - Student applications to RTO offers; and
    - RTO offers to actual enrolment of student;
  - the reasons why applications from potential students did not proceed to student enrolment status;
  - the number of student Visa refusals for students recruited by the agent;
  - any feedback or information from students or third parties regarding the agent;
  - the quality and accuracy of enrolment applications submitted by the agent;
  - the quality, accuracy and currency of information and advice provided by the agent to students; and
  - the quality of the appointment as assessed by the RTO.
- 4.1.4 Agent student Appraisals.
  - Students who have been recruited by an agent, may complete a Student Post Arrival Appraisal of Agent form.

##### 4.2 Re-appointment of an Agent

- 4.2.1 If, following completion of an existing agreement, the RTO is satisfied that the agent has not engaged in unprofessional conduct and breaching any part of the agent's agreement, a new Agent Agreement may be offered to the agent. The Agent performance review form (MK269) to be completed by Sales staff, Sales Team Leader and Compliance Manager before renewal is decided.
- 4.2.2 The new Agent Agreement is to be updated to include any new Home Affairs Department or Department of Education and Training or other regulations or requirements.
- 4.2.3 RTO staff will file the new Agent Agreement on the agent's file.

##### 4.3 Termination of an Agent

- 4.3.1 If the RTO believes or suspects that an agent has engaged in unprofessional conduct or has breached any of the conditions detailed in the agent's agreement, the Chief Executive Officer or delegated manager may write to and forward the *Agent Warning Letter* to the agent.
- 4.3.2 The agent must provide a written response within ten (10) business days of the date of the letter as specified above in *Item 1*. An extension of time to provide a response may be provided at the discretion of the Chief Executive Officer or delegated manager.
- 4.3.3 After ten (10) business days from the date of the letter as referred to in Item 1, or after the expiration of such further period as may have been granted as stated in Item 2, the Chief Executive Officer or delegated manager may consider the agent's performance in light of:
- the response of the agent to the letter referred to in Item 1;
  - whether the agent engaged in unprofessional conduct;
  - whether the agent breached the conditions of the agreement between the agent and the RTO and
  - the considerations contained in the Agent Audit, Items 3 (i-vii).
- 4.3.4 After considering the agent's conduct and performance, the Chief Executive Officer or delegated manager may:
- require the agent to undertake further training;
  - warn the agent and maintain the agent's appointment and impose conditions on the agent's agreement;
  - maintain the agent's appointment subject to certain conditions;
  - suspend the agent's appointment; or
  - terminate the agent's appointment immediately.
- 4.3.5 The Chief Executive Officer or delegated manager must terminate the appointment of an agent if they know or reasonably suspect the agent may have been engaged in unprofessional conduct or has breached the agent agreement.
- 4.3.6 Where Chief Executive Officer or delegated manager has made a decision as stated in Item 4 above, they may disclose that decision and the reasons for it to other people, organisations, bodies or professional associations, including the agent's employer. Any disclosure must be made in accordance with the RTO's Privacy Policy.
- 4.3.7 If the Chief Executive Officer or delegated manager decides to terminate an agent's appointment, Chief Executive Officer or delegated manager should:
- write to the agent to advise them that their appointment has been terminated using the *Agent Termination Letter*;
  - notify ASQA, Department of Home Affairs and the Department of Education and Training of the termination and the grounds for the termination; and
  - notify the RTO's admission centre, and sales and marketing departments of the termination of the agent and advise staff that no further applications are to be accepted from the agent.

## 5.0 **Responsibility**

- 5.1 **Chief Executive Officer:** Overall responsibility of the RTO's operations.
- 5.2 **General Manager VET:** Responsible for the day to day management of the RTO's operations.
- 5.3 **Director of Studies:** Responsible for the RTOs academic operations management.
- 5.4 **RTO Operations manager:** Responsible for the logistical, student support and administration operations of the RTO.

5.5 **Compliance Manager:** Responsible for the RTOs compliance and meeting the regulators requirements for the good management of a Registered Training Organisation

## 6.0 Policy Base

- 6.1 Baxter Institute - Agents Policy and Procedure.
- 6.2 Agent Appointment Monitoring and Termination Policy.
- 6.3 Education Services for Overseas Students Act 2000\
- 6.4 National Vocational Education and Training Regulator Act 2011 (the Act)
- 6.5 National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)
- 6.6 Standards for Registered Training Organisations (RTOs) 2015
- 6.7 Student Identifiers Act 2014
- 6.8 The Migration Act 1958
- 6.9 The Migration Regulations 1994

## 7.0 Associated Documents

- 7.1 Agent Appointment Procedure.
- 7.2 Agent Agreement (International) Students (CRICOS) and VET Domestic students)
- 7.3 Refer to Forms.
  - 7.3.1 MK168 Agent Audit Checklist
  - 7.3.2 Agent Reference Check
  - 7.3.3 Student Post Arrival Appraisal of Agent Form
  - 7.3.4 MK169 Agent Performance Review form

## 8.0 Records Management

Title	Location	Responsible Officer	Minimum Retention Period
<b>In-File Agent Checklist</b>	Office	RTO Operations manager	Seven (7) years after contract has expired or been terminated.
<b>Agent Agreement</b> <i>(Only available from the Centre for University Partnerships)</i>	Office	Chief Executive Officer or delegated RTO manager	Seven (7) years after contract has expired or been terminated.
<b>Agent Audit and Agent Performance Review</b>	Office & Compliance dept.	RTO Operations manager, Compliance team leader	Three (3) years after contract has expired or been terminated.
<b>Student Post Arrival Appraisal of Agent</b>	Office	RTO Operations manager, Compliance team leader	Three (3) years after contract has expired or been terminated.

<b>Agent Warning Letter</b>	Office	Chief Executive Officer or delegated RTO manager	Seven (7) years after contract has expired or been terminated.
<b>Agent Termination Letter</b>	Office	Chief Executive Officer or delegated RTO manager	Seven (7) years after contract has expired or been terminated.

## 9.0 Implementation

The Agent Appointment Monitoring and Termination Procedure will be implemented throughout the RTO via:

- An Announcement Notice under the RTO's website and through the RTO Policy -
- 'Recently Approved Documents' webpage to alert the RTO-wide community of the approved Procedure; and
- An email alert to all agents to inform them of the update.

**ANNEX A****Agent's Ethical Practices and Responsibilities Statement**

Australia offers a high-quality education experience to overseas students across all sectors, including English language and foundation programs through to higher education. By providing a fair and accessible system that supports overseas students, Australia has gained an enviable reputation as a popular study destination.

The Education Services for Overseas Students legislation is a robust framework that protects and enhances the experiences of overseas students in Australia. An integral part of the legislation is the National Code of Practice for Providers of Education and Training to Overseas Students (the National Code). The National Code provides nationally consistent standards for the conduct of registered providers and the registration of their courses.

Baxter Institute must comply, and ensure that education agents comply, with the CRICOS National Code to maintain their registration to provide education services to overseas students.

Under the National Code, education agents must act ethically, honestly and in the best interests of overseas students, as well as uphold the reputation of Australia's international education sector. In order to comply with these regulations, it is imperative that all education agents contracted to Baxter Institute understand and abide by the requirements and responsibilities set out in this Statement. Failure to do so will result in corrective action which may include termination of your education agent agreement.

**Education agents must:**

- enter a written agreement with Baxter Institute to be appointed as an authorised education agent.
- not provide migration (visa) advice unless authorised to do so under Australian migration law.
- not give false or misleading information, or engage in any deceptive practices, in the marketing and promotion of Baxter Institute's courses.
- not claim to commit to securing a migration outcome from undertaking an Baxter Institute course.
- not claim that an Baxter Institute course will guarantee any specific career or job outcome for a student.
- not actively recruit a student that has not completed the first six months of their principal course (except as permitted by Standard 7 of the CRICOS National Code 2018).
- not accept or recruit students reasonably suspected to be non-genuine entrants into Australia.
- provide students with sufficient information to enable them to make informed decisions about studying with Baxter Institute in Australia.
- declare in writing and take reasonable steps to avoid conflicts of interests with their duties as an authorised Baxter Institute education agent.
- observe appropriate levels of confidentiality and transparency in their dealings with overseas students or prospective overseas students.
- use RTO approved marketing and promotional materials in its recruitment activities have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.
- notify the RTO as soon as there are any changes to their Agency contact details and business information (i.e. registered address, email and/or director/owner details).
- **Note:** The Australian Government collects education agent details through PRISMS (the Australian Government's Provider Registration and International Student Management System) and makes available access to reports about the education agents Baxter Institute has engaged to recruit overseas students.
- If you have any questions about any of the requirements and responsibilities outlined in this Statement, please contact your Business Development Representative.

**ANNEX B**

**AUSTRALIAN INTERNATIONAL EDUCATION AND TRAINING AGENT CODE OF ETHICS**

**Introduction:**

Australia is committed to ensuring the highest standard of service and care is delivered across its international education and training sector and has a comprehensive international education and training quality framework to support this aim.

The Agent Code of Ethics (ACE) is a critical component of this framework and provides a guide to the expected professional behaviour of individual agents and agencies working with Australian international students, parents, providers and fellow agents across the sector.

The ACE builds on the London Statement's ethical framework and provides a set of Australian specific 'Standards' for Australia's education agents.

The ACE also aims to support Australia's education and training providers to meet their obligations under the National Code.

**1. Purpose**

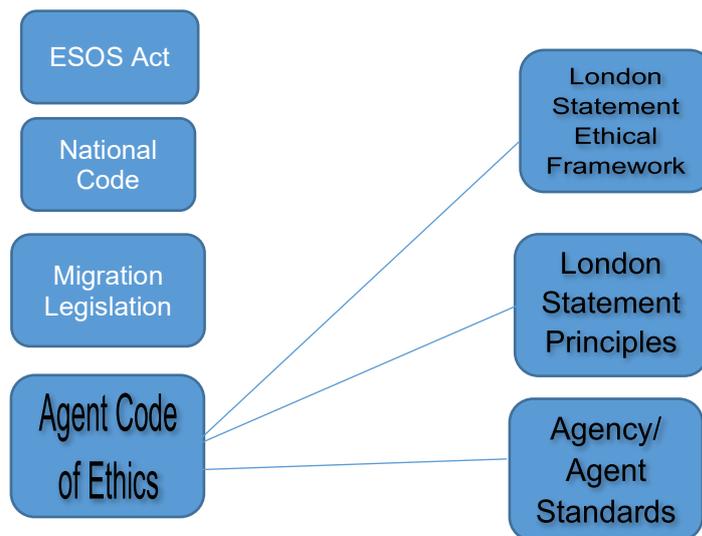
1.1 The Agent Code of Ethics aims to:

Outline the principles and expectations of fair and ethical conduct of Australia's offshore and onshore education agents

Foster best practice among education agents to assist them to provide quality services to potential and existing international students and partner providers

Provide assurances on the quality and standard of services provided by education agents recruiting into Australia

Build on Australia's globally recognised international education and training quality systems to further enhance the reputation of Australia's education system. Australian International Education and Training Australia's international education and training provides a holistic approach across the sector to ensure the highest quality outcomes for everyone. Agent quality is one component of a comprehensive and integrated quality system.



1.2 Education Agent Code of Ethics Australia's Education Agent Code of Ethics is based on three core elements of:

- The London Statement's Ethical Framework
- The London Statement's Principles
- 3. Australia's Education Agent Standards

1.3 The Australian education and training sector expects education agents to adhere to seven ethical principles, as outlined in the London Statement, that are supported by an underlying ethical framework of:

- Integrity – being straightforward and honest in all professional and business dealings;
- Objectivity – not allowing professional judgment to be compromised by bias or conflict of interest;
- Professional competence and due care, maintaining professional knowledge and professional service, and acting diligently;
- Transparency – declaring conflicts of interest to all clients, especially when service fees are charged to both the education provider and the prospective student;
- Confidentiality – respecting and preserving the confidentiality of personal information acquired and not releasing such information to third parties without proper authority;
- Professional behaviour – acting in accordance with relevant laws and regulations and dealing with clients competently, diligently and fairly; and
- Professionalism and purpose – acting in a manner that will serve the interests of clients and the wider society even at the expense of self-interest; recognising that dedication to these principles is the means by which the profession can earn the trust and confidence of stakeholder groups (individual clients, the public, business and government).

## 2. Principles

The London Statement Principles promote best practice among education agents and consultant professions that support international students. The Statement of Principles is a unifying set of understandings for the recruitment of students in international education that serve to promote best practice among education agents and consultants. The seven principles are:

***Principle 1: Agents and consultants practise responsible business ethics***

- Avoiding conflicts of interest.
- Observing appropriate levels of confidentiality and transparency.
- Acting professionally, honestly and responsibly.
- Refraining from being party to any attempt by students or others to engage in fraudulent visa applications.
- Acting in the best interests of the student at all times.
- Declaring conflicts of interest.
- Being transparent in fees to be paid by students and commissions paid by providers.
- Providing clear avenues for handling complaints and resolving disputes.
- Complying with relevant laws and regulations.

***Principle 2: Agents and consultants provide current, accurate and honest information in an ethical manner***

- Providing realistic and appropriate information that is tailored to the individual student's circumstances, particularly in relation to language skills, capacity to pay and level of study.
- Specifying the rights and responsibilities of the student in the country of destination.
- Refraining from claiming a direct government endorsement or privileged relationship with a public official or member of the government where one does not exist; including for example the misuse of national brand logos.

- Providing a registration number or other identifier on advertising material.
- Using institutions' officially approved material in promoting providers with whom agents have an agreement.

***Principle 3: Agents and consultants develop transparent business relationships with students and providers through the use of written agreements:***

- Signed by the student and the agent.
- Signed by the provider and the agent.
- Include information on the arrangements put in place by agents and consultants on behalf of the student, such as itemised payment schedules of fees and services, and refund and transfer policies.
- Provide details on information provided under Principles 1 and 2, as a means of guiding agents and consultants to give appropriate information to students so that both students and agents understand what has been agreed to maintain student confidentiality.
- Are archived in an appropriate manner so that the agreements can be made available to the student or an appropriate authority within a reasonable timeframe.

***Principle 4: Agents and consultants protect the interests of minors***

- Ensuring that the prospective student has adequate representation and support from a guardian and/or legal counsel during meetings with the agent or consultant and that this is recorded as informed consent before any money changes hands.
- Ensuring that the client has the legal capacity to enter into any commitment.
- Acting not only in accordance with relevant laws and regulations, but competently, diligently and fairly as befits dealings with minors.

***Principle 5: Agents and consultants provide current and up-to-date information that enables international students to make informed choices when selecting which agent or consultant to employ***

- Providing information to students about the accreditations the agents have met, the training they have undertaken, the memberships they hold to professional associations or processes undertaken to become registered and accredited education agents and consultants.
- Providing information about themselves that support comparison of qualifications and experience.

***Principle 6: Agents and consultants act professionally***

Participating in training courses and professional development wherever possible.

- Becoming members of professional associations and networks that promote and support best practice in the recruitment of international students.

***Principle 7: Agents and consultants work with destination countries and providers to raise ethical standards and best practice***

Sharing information on best practice in the recruitment of international students by education agents and consultants.

### **3. Standards**

To ensure alignment and equity, Australia's Standards for international education agents mirror the requirements for education and training providers as outlined in the ESOS Act and National Code.

The ACE provides a guide to the expected professional behaviour of individual agents and agencies working with Australian international students, parents, providers and fellow agents across the sector.

These Standards will be reviewed and updated to ensure continued relevance to the sector. The standards are:

STANDARD	ELEMENT
<p><b>Organisational Effectiveness</b></p>	<ul style="list-style-type: none"> <li>• Demonstrates effective organisational governance and appropriate ownership including a well-articulated strategic plan, policies and procedures.</li> <li>• Evidence of relevant and up-to date business licensing and or registration.</li> <li>• Discloses all relevant partnerships, affiliations and agreements are disclosed, including disclosure of sub agent representation agreements and a clearly articulated approach to managing these relationships is in place to ensure compliance with the ACE.</li> <li>• Offers assurance of the organisation’s financial integrity and financial systems.</li> <li>• Provides clear and transparent disclosure of recruitment practices and activities including countries serviced.</li> </ul>
<p><b>Business Ethics</b></p>	<ul style="list-style-type: none"> <li>• Demonstrates agency and individual agent adherence to the ethical standards and principles of the ACE.</li> <li>• Discloses any past, pending, threatened or potential litigation, arbitration or administrative actions or other disputes against the agency, CEO or other relevant business associate.</li> <li>• Provides current, accurate and appropriate information to students and offers a commitment to not knowingly providing false or misleading information.</li> <li>• Demonstrates openness and disclosure of any incentives to any party that may influence the student’s decisions.</li> </ul>
<p><b>Staff Capability</b></p>	<ul style="list-style-type: none"> <li>• Demonstrates effective human resource management practices are in place to ensure all employees and representatives are trained, informed and act in the best interests of clients at all times.</li> <li>• Demonstrates a strong working understanding the Australian education and training system, including all relevant legislation, regulations and information.</li> <li>• Completion of an Agent Training program and or other relevant education and training qualifications or programs.</li> </ul>
<p><b>Agency Recruitment Practices and Standards</b></p>	<ul style="list-style-type: none"> <li>• Implements considered and targeted marketing practices and ensures honest and accurate communication resources are in place.</li> <li>• Provides appropriate, fair and considered counselling of students including assessing the student’s willingness and ability to complete the courses, their understanding of course and provider requirements and awareness of realistic employment and pathway outcomes.</li> <li>• Demonstrates and articulates a clear and fair complaints and appeals process.</li> <li>• Offers transparent and clearly articulated fees and charges including a documented refund policy.</li> <li>• Ensures strict confidentiality of personal information and ensures this information is not shared with a third party unless consent is given.</li> </ul>

#### 4. Australia’s International Education Agent Code of Ethics main objectives

ETHICS	PRINCIPLES	STANDARDS
<p><b>Integrity:</b> being straightforward and honest in all professional and business dealings.</p> <p><b>Objectivity:</b> not allowing professional judgement to be compromised by bias or conflict of interest.</p> <p><b>Professionalism:</b> competence and due care maintaining professional knowledge and professional service and acting diligently.</p> <p><b>Transparency:</b> declaring conflicts of interest to all clients, especially when service fees are charged to both the education provider and the prospective student.</p> <p><b>Confidentiality:</b> respecting and preserving the confidentiality of personal information acquired and not releasing such information to third parties without authority.</p> <p><b>Professional behaviour:</b> acting in accordance with relevant laws and regulations, behaving with clients competently, diligently and fairly.</p> <p><b>Professionalism and behaviour:</b> acting in a manner that will serve the interests of clients and the wider society even at the expense of self-interest; recognising that dedication to these principles is the means by which the profession can earn the trust and confidence of stakeholder groups i.e. individual clients, the public, business, training providers and the government.</p>	<ul style="list-style-type: none"> <li>• Agents and consultants practice responsible business ethics.</li> <li>• Agents and consultants provide current, accurate and honest information in an ethical manner.</li> <li>• Agents and consultants develop transparent business relationships with students and providers using written agreements.</li> <li>• Agents and consultants protect the interests of minors.</li> <li>• Agents and consultants provide current and up to date information that enable international students to make informed choices when selecting which agent or consultant to employ.</li> <li>• Agents and consultants act professionally.</li> <li>• Agents and consultants work with destination countries and providers to raise ethical standards and best practice.</li> </ul>	<ul style="list-style-type: none"> <li>• Agents and consultants comply with this framework and the ACE.</li> <li>• Agency demonstrates robust organisation effectiveness.</li> <li>• Agency demonstrates strong business ethics.</li> <li>• Agency supports staff capability development and ongoing education.</li> <li>• Agency demonstrates quality and effective recruitment practices and standards at all times.</li> </ul>