

# Cape Breton University Agent Code of Conduct

## 1. Introduction, Purpose, and Scope

Cape Breton University is a leading public university located in the province of Nova Scotia that provides students from around the world with an educational experience that prepares them for their role in an exciting future. As the nature of international student recruitment has grown and evolved, our university must evolve to serve an increasingly diverse student population.

This document builds on the ongoing efforts that Cape Breton University is undertaking to create a student-focused experience with the highest standard of service and care. The Cape Breton University Agent Code of Conduct (the “Code of Conduct”) is a critical component of this framework and provides a guide for the expected professional behaviour of individual agents working with international students, parents, providers, and fellow agents across the sector.

The Code of Conduct builds on the ethical framework of the Statement of Principles for the Ethical Recruitment of International Students, known as the London statement, which has been providing guidance on policy and governance in the UK and Australia for the past ten years.

The Code of Conduct applies to all third-party agencies and partners who work to recruit students on behalf of Cape Breton University (hereinafter referred to as “an Agent” or “Agents”).

## 2. Core Values (The Ethical Framework of the London statement)

- 2.1 Integrity: being straightforward and honest in all professional and business dealings;
- 2.2 Objectivity: not allowing professional judgment to be compromised by bias or conflict of interest;
- 2.3 Professional competence and due care: maintaining professional knowledge and professional service, and acting diligently;
- 2.4 Transparency: declaring conflicts of interest to all clients, especially when service fees are charged to both the education provider and the prospective student;
- 2.5 Confidentiality: respecting and preserving the confidentiality of personal information, and not releasing such information to third parties without proper authority in line with Canadian data protection legislation;
- 2.6 Professional behaviour: acting in accordance with relevant laws and regulations and dealing with clients competently, diligently and fairly; and
- 2.7 Professionalism and purpose: acting in a manner that will serve the best 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).

### **3. Expectations**

#### **3.1 Ethical Practices**

Agents will:

- 3.1.1 Provide successful applicants to Cape Breton University with all necessary documentation and information for the student's success. This includes but is not limited to:
  - CBU student e-mail address; and
  - Full Notice of Acceptance as provided by CBU.
- 3.1.2 Undertake marketing of and communication about Cape Breton University's academic programs and services that is accurate, consistent, and not misleading. This includes not guaranteeing any academic, immigration or employment outcome.
- 3.1.3 Make accessible to prospective students information to support them to make informed choices about programs suited to their background, goals, and aspirations, including information about:
  - The nature of university education and student responsibilities at Cape Breton University.
  - Entry requirements, including language proficiency.
  - Student life in Cape Breton, including the types and cost of accommodation and the types of part-time work available while studying.
  - The student profile at the campus at which the program is delivered.
  - The services the university provides, such as academic supports, health-care services and housing services, as well as related services available in the community.
  - The status and cost of health care services, including any insurance requirements and information about uninsured health services.
- 3.1.4 Maintain the accuracy of all information provided to applicants. For greater clarity, Agents will not alter official CBU documents or communication before providing same to applicants or make any false or misleading statements concerning CBU or attendance at CBU

#### **3.2 Training**

Agents will:

- 3.2.2 Maintain familiarity with CBU's brand guidelines, which will be provided through Cape Breton University's International Agent Handbook.
- 3.2.3 Attend initial training session(s) upon joining Cape Breton University's agent network. These training sessions will be conducted by Cape Breton University staff.
- 3.2.4 Maintain regular contact with Cape Breton University and receive updates and training via telephone, written communication, virtual meetings and/or in-person visits. Agents will attend a minimum of one training session per semester in order to stay current with CBU's programs and policies. Agents must review and implement any information and training provided, including with respect to:
  - updated academic programs
  - school and admission information
  - revisions to procedures and application processes
  - branding guidelines, including the use and placement of Cape Breton University wordmarks, logos, and promotional materials.
- 3.2.5 Familiarize themselves with academic program changes, policies, admissions, marketing materials, application processes, visa regulations and other applicable information.

### **3.3 Monitoring, Inspection & Audit**

- 3.3.2 Cape Breton University will monitor Agent websites and other media (e.g., social) on a regular basis to ensure accurate and current representation of CBU-related information, including adherence to the terms and conditions for applications and admission.
- 3.3.3 Cape Breton University may randomly inspect Agents virtually or during on-site visits to confirm compliance with the Code of Conduct. Cape Breton University may conduct an audit of an Agent's compliance with the Agent's agreement(s) with CBU, and this Code of Conduct, at any time. Agents will provide all information reasonably necessary to conduct such inspection or audit to Cape Breton University upon request.
- 3.3.4 Notwithstanding any random inspection as provided for in Article 3.3.3, Agents will:
  - 3.3.4.1 Provide, upon request by CBU, materials used to promote CBU, to ensure accuracy and consistency. Such materials will be produced as soon as reasonably possible and no later than 5 business days following the request.
  - 3.3.4.2 Undergo an annual performance review by CBU and comply with all requests for materials and information which, in CBU's sole discretion, CBU deems necessary to give effect to such annual review.
- 3.3.5 Agents will bear the cost of complying with any requests for information by CBU.
- 3.3.6 Cape Breton University will investigate any complaints about Agents and take corrective action as deemed appropriate by CBU, in CBU's sole discretion, pursuant to the terms of this Code of Conduct and any applicable agreement(s).

### **4. Corrective Action**

- 4.1 Cape Breton University will issue a written warning to Agents who are in breach of this Code of Conduct. The warning will detail the infraction, corrective action and timeframe to complete the corrective action.
- 4.2 Agents are required to submit a written response either acknowledging or appealing the warning within ten (10) business days of the warning issuance date. Should the Agent not respond to Cape Breton University's warning within this time frame, CBU shall proceed to treat the infraction as an unremedied infraction pursuant to Article 4.5 of this Code of Conduct.
- 4.3 Cape Breton University will review and provide a written response to Agent appeals within fifteen (15) business days of receipt of the appeal.
- 4.4 Unless an alternate timeframe is mutually agreed upon by the Agent and Cape Breton University, Agents with failed appeals have ten (10) business days from the time CBU communicates its decision on the appeal, to remedy the infraction.
- 4.5 Agents with unremedied infractions may be subject to some or all of the following actions, in CBU's sole discretion:
  - 4.5.1 additional training as mandated by Cape Breton University
  - 4.5.2 restriction of recruitment activities on behalf of Cape Breton University
  - 4.5.3 lowering of application and/or commissionable-student quotas, as applicable
  - 4.5.4 temporary suspension of the Agent's representation of Cape Breton University
  - 4.5.5 termination of the Agent's agreement with Cape Breton University, subject to any applicable terms of that agreement.