

Education Agent Management Policy

Fact box

- **Policy owner:** Associate Director of International Student Recruitment
- **Policy category:** Management: Executive
- **Policy status:** Approved
- **Approval body:** Executive
- **Endorsement body:** Vice President Operations
- **Related policies:**
 - [Enrolment Policy](#)
 - [Exclusion from a Course or Subject Policy](#)
 - [Marketing Policy](#)
- **Last amended:** 4th April 2025
- **Relevant HESF:** 1.1, 1.2, 2.1, 2.2, 2.3, 2.4, 3.3, 4.2, 6.2, 6.3, 7.1, 7.2

Purpose

This policy provides a framework within which Alphacrucis University College (AC) exercises its due diligence with regard to the appointment, induction, training, monitoring and review of education agents, education agent performance, and ongoing management of education agents within the requirements of relevant legislation, and its strategic goals.

Scope

This policy applies to:

- All AC stakeholders whose role involves the recruitment, management and review of education agents
- International education agents appointed by AC for the purpose of international student recruitment

Policy

AC is committed to managing inherent risks with regard to the international student market by appointing and working with education agents who have an:

- ethical commitment to the best interests of international students
- extensive knowledge of the education system in Australia and the legislative instruments pertaining to the international education sector
- extensive knowledge of the programs, courses, policies and procedures of AC
- alignment to AC's core values
- appreciation of the Australian culture

Education Agents are expected to facilitate AC student recruitment targets by:

- promoting AC programs and courses in identified markets lawfully, accurately and with integrity
- undertaking Genuine Student (GS) checks prior to the submission of applications to AC

- provide market intelligence, including trends, program popularity and demand to inform future recruitment strategies
- upholding the reputation of AC and the Australian education sector at all times
- complying with AC admissions and policy frameworks, values, and broader legislative requirements
- ensuring satisfactory performance in terms of student quantity, quality and diversity as well as meeting any set Key Performance Indicators (KPIs).

Supporting guidelines

Australian International Education and Training - Agent Code of Ethics

Responsible for implementation

Associate Director, International Student Recruitment

Key stakeholders

Education Agents

Director International Student Recruitment

Chief Marketing Officer

Quality Assurance Committee

AC Third Party Partners

International Students

Related legislation

Higher Education Standards Framework

Federal Register of Legislation - Standards for Registered Training Organisations (RTOs) 2015

Education Services for Overseas Students Act 2000 and Regulations (ESOS Act)

The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018);

Immigration (Education) Act 1971

The Australian International Education and Training Agent Code of Ethics

The Privacy Act 1988

Spam Act 2003

Procedures

Education Agent Management Procedures

The Director International Student Recruitment is operationally responsible for the appointment, induction, training, monitoring and review of education agent performance, and their ongoing management.

Appointment of Agents

AC will:

- exercise due diligence in the assessment and recruitment of education agents, recording all outcomes on the agent's company profile in Studylink

- ensure a valid Agreement between AC and the agency, as well as an Agency Certificate, are made available to both parties and stored in Studylink
- ensure that, upon appointment, the agent's details are added to PRISMS in accordance with: <https://prisms.education.gov.au/information/ShowContent.ashx?Doc=How to manage Agent Details.pdf> and ASQANet
- ensure that, when education agents recruit students for VET courses, AC registers each agent as a third party in ASQANet

Induction and Training of Agents

AC will provide an education agent induction program and ongoing training which will cover:

- the ESOS Act and National Code requirements
- the HESF and RTO Standards requirements
- education agent management, including the monitoring and review process
- relevant AC policies and frameworks and other compliance requirements
- agent responsibilities associated with being an AC appointed agent as stated in the agency agreement
- AC responsibilities with regard to the relevant legislative instruments

Ongoing Monitoring and Review of Education Agent Performance

AC will monitor and review education agent performance throughout the life of their agency agreement. Monitoring and review processes will include, but are not limited to, the following methods:

- regular meetings with education agents
- student feedback
- data, including but not limited to –
 - visa approval rates (PRISMS)
 - CoE conversion rates
 - progression and attrition of students
 - academic intervention
- education agent websites, events and student communications for accurate and ethical communication

Annual Review

AC will undertake an annual review of education agent performance to determine if the agency agreement will be continued or terminated.

Review criteria include, but are not limited to:

- professional and ethical education agent interactions with AC and/or students
- working in the best interests of AC and its students

- quality of students referred to AC
- conversion and visa success rates

The outcome of the education agent performance review will be recorded on the agent profile within Studylink.

Renewal, Suspension or Termination of Agency Agreements

AC education agent agreements are initially valid for two years. AC has no obligation to renew an education agent agreement. In the case of an education agent agreement renewal, agents will be required to complete an *AC Agreement Renewal Form*.

AC will conduct an immediate investigation in relation to an agent should it become aware of any allegation or conduct pertaining to behaviours mentioned in Clauses 5.1.1 through 5.1.3. The investigation may lead to the suspension or termination of the agency agreement.

As per the terms of the agency agreement (Clause 9.1), AC may, at its discretion, terminate an agency agreement with 30 days' notice.

Suspension or termination of an agency agreement may occur in the following cases relating to agent conduct:

- a breach of the agency agreement
- referral of unqualified students or non-genuine students
- unsatisfactory performance in relation to KPIs set by AC
- unsatisfactory student feedback in relation to the services rendered by the agent
- misrepresentation of AC or reputational damage caused to AC
- non-compliance with the ESOS Act and/or the National Code 2018/or other Standards
- unprofessional, unethical, or unlawful conduct
- unsatisfactory value/output from the agent

Upon suspension of an agency agreement, the agent is required to:

- cease any promotional activity on behalf of AC
- return to AC any promotional material supplied
- cease the submission of any student applications

Upon termination of an agency agreement, AC:

- will remove any access to systems that were previously available to agents
- may disclose the termination to other parties, including government departments, agencies and the agent's employer, within relevant privacy regulations
- may discontinue the payment of any outstanding commissions from the date of termination of the agreement where the termination was on the basis of unethical, unprofessional or unlawful conduct

Change of Agent

There are limited circumstances in which students can seek a change of agent. These include, but are not limited to cases where AC has terminated the agency agreement for the above reasons.

Typically, AC does not allow for a change of agent request where a COE has been issued. To instigate the change of agent process, the student is required to submit the following to AC:

- an AC Change of Agent Request form which identifies the intended new authorised agent
- a statement identifying why changing agents is within the student's best interests
- a release email from the existing agent

The change of agent application will be assessed by the Director International Student Recruitment to determine if the change of agent request is within the best interests of the student.

The change of agent application will be declined if the intended new agent is not an existing authorised AC agent.

The existing agent will be given an opportunity to respond to the request within 48 hours of notification from AC.

Upon approval of the application, AC will:

- notify the existing agent of the student's intended change of agent
 - Inform the new agent that AC has approved the change of agent request
 - Update Studylink to reflect the change
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