

Agent Appointment and Management Policy

1. Purpose and Scope

- 1.1 The Agent Appointment and Management Policy outlines the principles associated with the appointment and management of international education agents for AIAT.
- 1.2 This policy applies to appointed Agents and staff involved in the appointment and monitoring of international education agents.

2. Definitions

Refer to *Glossary of Terms* for commonly used terms. The definitions below are included for clarity.

Agent: Any person or organisation who is contracted by AIAT to recruit international students and refer them to AIAT. The Agent may provide education counselling to international students as well as marketing and promotion services to AIAT. Agents may be operating in Australia and/or overseas.

Agent Agreement: Agreement between the Agent and AIAT.

ESOS legislative framework: Establishes legislative requirements (Education Services for Overseas Students Act) and standards for the quality assurance of education and training institutions offering courses to international students who are in Australia on a student visa. ESOS also provides tuition fee protection for international students.

National Code: The National Code is a legislative instrument (National Code of Practice for Providers of Education and Training to Overseas Students 2018) made under the Education Services for Overseas Students Act and sets nationally consistent standards to support providers to deliver quality education and training to overseas students.

PRISMS - Provider Registration and International Student Management System.

3. Policy Statement

- 3.1 AIAT is committed to ensuring that its international education agents (Agents) act ethically and in line with AIAT's mission, legislative and regulatory obligations.

4. Policy Principles

- 4.1 AIAT will
 - 4.1.1 appoint high quality international education agents (Agents);
 - 4.1.2 provide adequate training and information to Agents, including their obligations under the ESOS legislative framework and National Code;

- 4.1.3 provide adequate support to Agents to assist with their recruitment of students;
 - 4.1.4 manage the Agents relationship in a professional and responsible manner;
 - 4.1.5 manage and mitigate reputational and other risks associated with Agents;
 - 4.1.6 regularly review Agent performance; and
 - 4.1.7 take immediate corrective and preventative action upon becoming aware of an Agent being negligent, careless or incompetent or being engaged in false, misleading or unethical advertising or recruitment practices, including practices that could harm the integrity of Australian education and training.
- 4.2 AIAT will immediately suspend, discontinue or terminate a contract with an Agent who:
- 4.2.1 seriously breach their contract with AIAT;
 - 4.2.2 do not meet performance criteria or KPIs as set by AIAT;
 - 4.2.3 represent AIAT in an incorrect or dishonest manner;
 - 4.2.4 damage the reputation of AIAT;
 - 4.2.5 do not comply with AIAT’s admissions requirements, policy frameworks or values;
 - 4.2.6 do not comply with Australian legislative requirements including the ESOS Act and the Agent Code of Ethics; or
 - 4.2.7 provide services to students which are poor, unethical and dishonest.
- 4.3 An accurate database of approved Agents will be maintained and published on AIAT’s website.
- 4.4 AIAT will enter and maintain the Agent’s details in PRISMS, as required under the National Code.

5. Roles and responsibilities

- 5.1 The Director: Marketing is responsible for:
- 5.1.1 the selection, assessment and appointment of Agents with approval from the CEO;
 - 5.1.2 responding to Agent solicitations;
 - 5.1.3 the development and issuing of Agent Agreements;
 - 5.1.4 signing agreements with Agents not already engaged;
 - 5.1.5 the management and contractual oversight of Agents;
 - 5.1.6 the compliance of Agent activities with the ESOS Act, National Code, Migration Act, Agent Agreement and AIAT policy;
 - 5.1.7 ensuring student applications submitted by an Agent are only accepted from Agents with a signed agreement in place;
 - 5.1.8 taking corrective action (which may include termination of an agreement) with any Agent that does not perform satisfactorily or does not comply with the terms and conditions of the Agent Agreement;
 - 5.1.9 undertaking Agent performance reviews;
 - 5.1.10 organising agreement renewals and terminations when approved by the CEO; and
 - 5.1.11 reporting annually to the Board of Directors on Agent activity.
- 5.2 Agents are expected to:

- 5.2.1 act in accordance with the ESOS legislative framework, National Code and the Agent Code of Ethics;
- 5.2.2 support AIAT's student recruitment objectives;
- 5.2.3 promote AIAT's courses;
- 5.2.4 undertake lead-generation activities and assist with conversion of these leads;
- 5.2.5 provide in-country representation in existing, new and emerging markets for AIAT;
- 5.2.6 counsel students on AIAT pathway programs and provide 'leads' to these courses;
- 5.2.7 assist prospective students in completing AIAT course applications, taking all reasonable steps to confirm the accuracy of the information provided by prospective students in those applications;
- 5.2.8 ensuring that only completed, signed applications with all required supporting documentation (originals sighted, verified, and stamped) are submitted to AIAT;
- 5.2.9 undertake Genuine Temporary Entrant (GTE) checks prior to the submission of applications to AIAT;
- 5.2.10 ensure confidentiality of all information provided by AIAT and prospective and existing students, other than to the extent disclosure is required to perform the Services in accordance with Agent Agreement, and to the extent, disclosure is necessary to comply with legislative and regulatory requirements;
- 5.2.11 terminate any employment, contract or agreement with any employee or Sub-agent if the Agent becomes aware of, or reasonably suspects, dishonest practices, including engaging in false or misleading practices and the deliberate attempt to recruit a student where this conflicts with the obligations of registered providers under the National Code or any other dishonest practices; and
- 5.2.12 provide market intelligence, including trends, course popularity and demand to inform future recruitment strategy development.

6. Policy Details

Institution	Australian Institute of Advanced Technologies (AIAT)
Policy name	Agent Appointment and Management Policy
Policy Reference No.	POL – 01
Policy Approval	Board of Directors
Policy Authority	Executive Management Group
Responsible Officer	CEO
Governance Reference Threshold Standards	HESF 2021: 2.4.1, 7.1.1, 7.1.4, 7.1.5
Related Documents	Agent Appointment and Management Procedure Staff Code of Conduct
Related Legislation	Australian International Education and Training – Agent Code of Ethics Education Services for Overseas Students Act 2000 (Cth) (ESOS) Higher Education Standards Framework (Threshold Standards) 2021 (HESF)

	<p>Migration Act 1958</p> <p>Migration Regulations 1994</p> <p>National Code of Practice for Providers of Education and Training to Overseas Students 2018</p>
References	<p>AIAT has referred and benchmarked with the following institutions and policies during the creation of this policy:</p> <p>Australian National University (2021) Policy: International student education agent management</p> <p>Charles Sturt University (unknown) International Education Agent Policy, <i>retrieved 29/11/2021</i></p> <p>Federation University (2021) Agent Appointment Monitoring and Termination Policy</p> <p>The University of Notre Dame Australia (2019) Policy: International Education Agents</p>
Date of approval	31 March 2022
Review date	December 2024
Policy Category	Governance

6. Document Version Control

Document No	POL - 01	Last Modify Date	Summary of Changes
Version No	1.0	NA	Initial version approved by Board of Directors
	1.01	31/3/2022	Updated HESF
Created Date	Feb 2022		