



AUSTRALIAN INSTITUTE
OF HIGHER EDUCATION

Agent Management Policy and Procedure

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Policy owner	Chief Growth Officer
Responsible Officer	Partner Experience Manager
Approving authority	Board of Directors
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Related Documents	Student Admissions Policy and Procedure
HESF (Threshold Standards) 2021	N/A

1. Purpose

This Policy and Procedure sets out how the Australian Institute of Higher Education Pty Ltd ('the Institute') engages and manages international education agents ('agents') with reference to the Institute's obligations under the National Code 2018 ('National Code') and the Education Services for Overseas Students Act 2000 ('ESOS Act').

2. Principles

The Institute will enter into a written agency agreement with each agent it engages to formally represent it. Agents will be formally engaged for a period of two years, at which time the contract may be renewed at the discretion of the Institute. The following will apply to all contracted agents:

- The Institute will maintain updated records on agents in its student management system and in PRISMS.
- The institute will maintain a register of all engaged agents and will publicise this through its website.
- The Institute will appoint agents on a non-exclusive basis.
- The Institute will require all agents to know and adhere to the requirements of the National Code and the ESOS Act and any other legislation in so far as it relates to the provision of services by agents to the Institute.
- The Institute will require agents to have an appropriate knowledge of the Institute, Australian International Education system and the requirements of the Australian student visa system.

- The Institute will require all marketing activities undertaken by agents in relation to the recruitment of students to be approved by the Institute and be in accordance with all relevant legislative requirements.
- The Institute will provide agents with accurate and up-to-date course and other information and materials to enable them to conduct their services.
- The Institute will advise agents as soon as practicable of changes to legal or regulatory conditions which may affect any potential enrolments with the Institute.

3. Context

This policy has been developed to ensure that:

- Both the Institute and its agents are aware of, and adhere to, the National Code and the ESOS Act.
- There are guiding principles for the engagement and management of international education agents for the purpose of international student recruitment and enrolment to the Institute.

Agents play a vital role in connecting prospective international students (both overseas and Australia-based) with Australian educational institutions. In playing this vital role, the ethics and procedures followed by agents are of crucial importance to maintaining the integrity of the Australian higher education sector.

In order to comply with the National Code, the Institute must enter into a written agreement with each agent it engages to formally represent it. The agreement must specify the responsibilities of the agent and the Institute, including the Institute's responsibility for compliance with the National Code and the ESOS Act at all times. The agent agreement is required to include, among other things:

- the Institute's processes for monitoring the activities of agents, including where corrective action may be taken by the Institute; and
- grounds upon which the Institute may terminate the written agreement with an agent, including but not limited to: dishonest practice including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of a registered provider; recruiting students whom the agents believe will not comply with their student visa conditions; providing immigration or migration advice where not authorised to do so under the Migration Act 1958.

4. Scope

This Policy and Procedure relates to the Institute (including the Institute's Executive Leadership team, International Student Recruitment and Admissions staff) and agents engaged by the Institute.

5. Definitions

See the *AIH Glossary of Terms* for definitions.

6. Policy details

6.1 Head of Admissions Responsibilities

The Head of Admissions is responsible for ensuring agent data is accurately entered into and maintained in PRISMS.

6.2 International Student Recruitment Staff Responsibilities

International student recruitment staff are responsible for reviewing agent performance data each Study Period, monitoring agents for compliance with the agent agreement, National Code and ESOS Act and escalating occurrences of non-compliance to the policy's Responsible Officer.

6.3 Responsible Officer

The policy's Responsible Officer is accountable for:

- entering into and maintaining accurate agent data in the Institute's systems,
- managing agent agreements,
- reporting incidents of non-compliances with the agent agreement, National Code or ESOS Act to the Principal/Chief Executive Officer,
- reporting on agent performance on a Study Period and annual basis to the Policy Owner, and
- making recommendations to the Principal/Chief Executive Officer in relation to the engagement and management of the Institute's Agents.

6.4 Policy Owner

The Policy Owner is responsible for:

- ensuring the Institute implements the procedures in section 7 to maintain compliance with the agent agreement, the National Code and the ESOS Act, including the entry and maintenance of accurate agent data in PRISMS and the student management system,
- reporting on agent performance, including incidents of non-compliance with the agent agreement, National Code, or ESOS Act, to the Board of Directors, and
- ensuring that the agent agreement is compliant with Standard 4 of the National Code.

6.5 Agent Responsibilities

Agents must comply with the obligations prescribed in the agent agreement, National Code and ESOS Act, and take all steps required to ensure that the Institute does not breach any of its obligations through engagement of the agent.

Apart from representing the Institute in an ethical and professional manner, in accordance with requirements to maintain the integrity of the Australian student visa program, the Institute only engages agents who seek to recruit high quality and genuine students. Agents must keep updated with these requirements.

The Institute's agents must ensure all applicants for enrolment in the Institute's courses meet the requirements of the Australian government for a student visa. Prior to submitting a student's application to the Institute, the agent must take into consideration all criteria stipulated by the Department of Home Affairs and the student's intention to comply with visa conditions.

Agents must advise prospective students that the Institute may undertake further screening of the student to determine suitability for a student visa prior to making an offer to the student.

An agent engaged by the Institute is an important representative of the Institute for the purposes of student recruitment. The Institute supports marketing and recruitment activities of its agents through the Institute's participation in:

- Student exhibitions and interview programs in an advertised venue or virtual fairs;
- Student interviews/seminars in the agent's office;
- Briefing and training of counsellors;
- Email updates;
- Briefing of Faculty and/or course experts;
- Advertising in conjunction with the agent.

The Institute will ensure that its agents have access to up-to-date and accurate marketing information so that the agent can clearly inform students regarding their study options at the Institute.

7. Procedure

7.1 Agent Appointment

- Agents may submit an expression of interest to represent the Institute by emailing partner@aih.edu.au.
- The Institute may also strategically approach agents directly and invite them to become an agent for the Institute.
- Agents deemed suitable and meeting the Institute's requirements for additional representation will be emailed a link to complete a formal application which will be require the following accompanying information: Business Registration, Company Profile, Referees from a minimum of two Australian education institutions, and any relevant qualifications, migration agent or industry certifications, where held.
- The relevant International Student Recruitment staff (based on region) is responsible for reviewing the agent's application and approving the engagement of education agent.

- In the event of an agent's application being successful, an agent agreement shall be prepared for execution and exchange.
- In the event of an agent's application being rejected, notification will be forwarded to the agent and the decision recorded on the Institute's student management system.
- The International Student Recruitment staff are the key points of contact and liaison with agents, including for issues relating to admissions, planning or promotion activities, advertising, training of agents and counsellors.

7.2 Training and Monitoring Authorised agents

- Agents engaged by the Institute will receive comprehensive induction and training including information relating to international education in Australia, Australian requirements for and conditions of student visas, the Institute's programs and courses, and administrative procedures and forms.
- The relevant International Student Recruitment staff will actively monitor the performance of its agents on an ongoing basis.
- The Policy Owner or delegate will undertake regular agent monitoring using data from internal databases, Australian Government agencies and their reporting systems and student feedback.
- Formal monitoring of agents occurs at least annually, and includes.
 - Review of agent performance in terms of new student referrals, visa outcomes, overall compliance, student attrition and academic outcomes with the aim of escalating immediate issues for action.
 - Recommendations on the ongoing appointment of agents.
- The Responsible Officer, in conjunction with International Student Recruitment staff, is responsible for the monitoring and review of agents at the Institute and will report on outcomes to the Policy Owner.
- The Policy Owner will report monitoring outcomes to the Board of Directors.

7.3 Agent Communication

- The policy's Responsible Officer, in conjunction with International Student Recruitment staff, is responsible for communication with agents regarding contract renewal, key operational updates, policy changes, enrolment details, training, and termination.

7.4 Agent Termination

- In the case of complaints made by students in relation to agents, the Policy Owner or delegate will undertake an investigation of the complaint, document the

complaint received and, if required, escalate with a request for immediate corrective action or termination.

- The Institute will take immediate corrective action where it becomes aware, or has reason to believe, that an agent (or an employee or subcontractor of that agent) has not complied with its responsibilities under the agent agreement, National Code or ESOS Act.
- The Institute will immediately terminate its relationship with an agent where it becomes aware, or has reason to believe, that the agent (or employee or subcontractor of that agent) has intentionally or negligently engaged in false or misleading recruitment practices.
- The Institute may decide to maintain an agent’s appointment where an individual employee or subcontractor of the agent was responsible for the conduct outlined immediately above and the agent has terminated the relationship with the individual employee or sub-contractor.

8. Legislation

This policy is formulated taking into consideration the requirements of the ESOS Act and the National Code.

9. Version Control

This Policy and Procedure has been endorsed by the Australian Institute of Higher Education Board of Directors as at July 2024 and is reviewed at least every 3 years. The Policy and Procedure is published and available on the Australian Institute of Higher Education website <http://www.aih.edu.au> under ‘Policies and Procedures’.

Change and Version Control				
Version	Authored by	Brief Description of the changes	Date Approved:	Effective Date:
2019.1	Principal	Template created.	22 November 2019	25 November 2019
2021.1	Director, Student Recruitment & Admissions	Changes to title and agent responsibilities Formatting changes	7 July 2021	13 July 2021
2022.1	Registrar	Updated Higher Education Standards Framework [Threshold Standard] 2021	25 May 2022	26 May 2022
2024.1	Chief Growth Officer/ Partner Experience Manager	Reference to student visa criteria and SSVF updated to be more generic for relevance to recent and future regulatory changes. Updated position titles to refer to the policy owners and responsible officers to provide easier updating of positions in future.	30 July 2025	31 July 2025