



Education Agent Management Policy

Effective Date: 2024.05.21

Last Reviewed: 2024.05.21

Version: v1.2 2026.03.26

1. 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.

2. Scope

This policy applies to all AC stakeholders whose role involves the recruitment, management and review of education agents, and to international education agents appointed by AC for the purpose of international student recruitment.

3. Definitions

- 3.1. **Education Agent:** an individual or organisation engaged by AC to recruit prospective international students, guided by the terms outlined in this policy and any related agency agreement.
- 3.2. **Director International Student Recruitment:** the officer operationally responsible for the appointment, induction, training, monitoring and review of education agent performance and ongoing management.
- 3.3. **ESOS Act:** the Education Services for Overseas Students Act 2000.
- 3.4. **National Code 2018:** the National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- 3.5. **PRISMS:** the Provider Registration and International Student Management System.
- 3.6. **KPIs:** Key Performance Indicators established by AC to measure education agent performance.
- 3.7. **CoE:** Confirmation of Enrolment, issued by AC to students who have been offered and accepted a place in an AC course.
- 3.8. **Studylink:** the student information and agent management system used by AC to record agent profiles, agreements, and performance data.

4. Policy Statement

4.1. Agent Selection Principles

- 4.1.1. AC is committed to managing inherent risks with regard to the international student market by appointing and working with education agents who have an:
 - a. ethical commitment to the best interests of international students;
 - b. extensive knowledge of the education system in Australia and the legislative instruments pertaining to the international education sector;
 - c. extensive knowledge of the programs, courses, policies and procedures of AC;
 - d. alignment to AC's core values; and
 - e. appreciation of the Australian culture.

4.2. Agent Expectations

- 4.2.1. Education Agents are expected to facilitate AC student recruitment targets by:
 - a. promoting AC programs and courses in identified markets lawfully, accurately and with integrity;
 - b. undertaking Genuine Student (GS) checks prior to the submission of applications to AC;



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

5. Roles and Responsibilities

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

5.2. Chief Marketing Officer: The Chief Marketing Officer is responsible for policy oversight and implementation, and for ensuring AC's education agent management practices are consistent with AC's strategic goals and legislative obligations.

6. Procedures

6.1. Appointment of Agents

6.1.1. AC will:

- a. exercise due diligence in the assessment and recruitment of education agents, recording all outcomes on the agent's company profile in Studylink;
- b. 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;
- c. ensure that, upon appointment, the agent's details are added to PRISMS in accordance with the relevant PRISMS guide and ASQANet; and
- d. ensure that, when education agents recruit students for VET courses, AC registers each agent as a third party in ASQANet.

6.2. Induction and Training of Agents

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

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

6.3. Ongoing Monitoring and Review of Education Agent Performance

6.3.1. 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:

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



6.4. Annual Review

- 6.4.1. 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:
- a. professional and ethical education agent interactions with AC and/or students;
 - b. working in the best interests of AC and its students;
 - c. quality of students referred to AC; and
 - d. conversion and visa success rates.
- 6.4.2. The outcome of the education agent performance review will be recorded on the agent profile within Studylink.

6.5. Renewal, Suspension or Termination of Agency Agreements

- 6.5.1. 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.
- 6.5.2. 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 the suspension or termination clauses below. The investigation may lead to the suspension or termination of the agency agreement.
- 6.5.3. As per the terms of the agency agreement, AC may, at its discretion, terminate an agency agreement with 30 days' notice.
- 6.5.4. Suspension or termination of an agency agreement may occur in the following cases relating to agent conduct:
- a. a breach of the agency agreement;
 - b. referral of unqualified students or non-genuine students;
 - c. unsatisfactory performance in relation to KPIs set by AC;
 - d. unsatisfactory student feedback in relation to the services rendered by the agent;
 - e. misrepresentation of AC or reputational damage caused to AC;
 - f. non-compliance with the ESOS Act and/or the National Code 2018 or other Standards;
 - g. unprofessional, unethical, or unlawful conduct; and
 - h. unsatisfactory value/output from the agent.
- 6.5.5. Upon suspension of an agency agreement, the agent is required to:
- a. cease any promotional activity on behalf of AC;
 - b. return to AC any promotional material supplied; and
 - c. cease the submission of any student applications.
- 6.5.6. Upon termination of an agency agreement, AC:
- a. will remove any access to systems that were previously available to agents;
 - b. may disclose the termination to other parties, including government departments, agencies and the agent's employer, within relevant privacy regulations; and
 - c. 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.

6.6. Change of Agent

- 6.6.1. 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. 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 an AC Change of Agent Request form which identifies the intended new authorised agent.



7. Responsible for Implementation

7.1. Chief Marketing Officer.

8. Related AC Policies or Documents, Standards and Legislations

8.1.AC Policies or Documents

This policy is to be read in conjunction with the following AC policies available at ac.edu.au/ppm/:

8.1.1. Third Party Arrangement Implementation and Management Policy;

8.1.2. International Student Policy.

8.2. Relevant Standards and Legislation

8.2.1. Education Services for Overseas Students Act 2000 (ESOS Act);

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

8.2.3. Higher Education Standards Framework (Threshold Standards) 2021;

8.2.4. Standards for Registered Training Organisations (RTOs) 2015.

9. Review and Revision

This policy will be reviewed by the Chief Marketing Officer on a regular basis in accordance with the Policy Development and Review Policy. Any proposed changes will be endorsed by the Chief Financial Officer and tabled at the Executive for approval. Revisions will be communicated to all relevant stakeholders upon approval.

10. History of Approval and Amendments

Policy owner	Chief Marketing Officer
Policy category	Management: International
Policy status	Approved
Approval Body	Executive
Endorsement Body	Chief Financial Officer
Approval Date	2024.05.21
Last Review Date	2024.05.21
History of Policy Amendments	
V1 2024.05.21	New policy approved.
V1.2 2026.03.26	Reformatting to new template.

Add a new row for each version of the policy. Do not remove previous changes.

Appendices

- N/A