

International Education Agent Management Procedure

Section 1 - Purpose

(1) In accordance with the terms of the Agent Agreement, the [Education Services for Overseas Students Act 2000](#), and the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#), this Procedure details the steps required for:

- a. assessing and approving applications from prospective education agents (Part A);
- b. ensuring that agents perform to the required standards and targets as set out by the Global and Domestic Student Recruitment Teams and the Agent Agreement to enable strategic review of the University's agent network (Part B);
- c. investigating and managing actual or potential compliance incidents (Part C); and
- d. exiting from a formal relationship with an agent due to the expiry of an existing Agent Agreement (non-renewal) or due to a breach of contract or non-performance (termination) within the agreement term (Part D).

Scope

(2) This Procedure applies to all University staff, contractors, and international education agents who recruit international students on the University's behalf.

Section 2 - Policy

(3) Refer to the [International Education Agent Policy](#).

Section 3 - Procedures

Part A - Agent Appointment

International Compliance Manager

(4) Liaise with the potential agents identified by Regional Directors, Global and Domestic Student Recruitment to complete application forms and collect all required documentation.

(5) Perform the necessary due diligence checks as provided on the Macquarie Representative Application Form including:

- a. company registration (ABN confirmation; company website; business registry on government websites; stock exchange listings, reports and announcements etc.);
- b. referee's reports (as nominated by the agent);
- c. evidence of agent knowledge and qualifications in relation to Australian education framework and providers (PIER, EATC, ICEF);

- d. experience of the company director / operational manager (company org chart, Director's CV, company history on website);
- e. immigration risks (visa refusal figure); and
- f. recruitment performance for other institutions.

(6) Review the recommendations of the Regional Directors, Global and Domestic Student Recruitment. Discuss / clarify any areas of concern, additional training or qualifications necessary, recommended remuneration.

(7) If due diligence findings are positive, provide application information, findings, and recommendation to the Director, International Operations, and Executive Director, International for their review and recommendation.

(8) If the findings are not positive, confirm refusal of the application with the Regional Directors, Global and Domestic Student Recruitment, and Executive Director, International.

(9) If agent appointment is recommended, prepare Agent Agreement on the appropriate template for approval and signature of Chief Student Recruitment Officer (Global and Domestic).

(10) Create agent profile and codes on all relevant systems including Student Administration system (Agent and Office Codes); StudyLink Admissions system and application portal; UAC application system; the University's Agent Commission Database; Freight provider online ordering system; Ascent One Agent Management system.

(11) Issue Agent Agreement to the agent and once returned complete Ascent One set-up to ensure Agent details are displayed on Macquarie's website and relevant documents and commission details recorded.

(12) Upload final executed agreement / refusal letter and related documentation to [TRUTH](#).

Regional Directors, Global and Domestic Student Recruitment

(13) Notify International Compliance Manager when a potential agent is identified, or application request received.

(14) Follow-up with individual agents on pending documents to facilitate the application process.

(15) Following receipt of completed applications make recommendations on the potential agent including:

- a. quality and experience of the agent;
- b. strategic reasons for appointing another agent;
- c. ability to appropriately service another agent; and
- d. remuneration package including relativities in market.

(16) Ensure site visits, Macquarie specific training, promotional materials, agent portal access are provided prior to contract commencement.

Director, International Operations and Executive Director, International

(17) Review findings prepared by the International Compliance Manager, and recommendations from Regional Directors, Global and Domestic Student Recruitment for recommendation to the Chief Student Recruitment Officer (Global and Domestic).

Part B - Agent Performance Review

International Compliance Manager

(18) Forward the following reports to the Regional Directors, Global and Domestic Student Recruitment in preparation

for the review in October each year:

- a. Agent annual reports from agent; and
- b. Student Satisfaction Survey report

(19) Collate relevant Agent performance data in November each year for review including:

- a. Agent remuneration information;
- b. Agent recruitment statistics;
- c. Event/visit attendance (from Regional Directors, Global and Domestic Student Recruitment);
- d. Marketing related and commission spending (from Central Finances Services);
- e. Visa refusal data (if any); and
- f. Compliance incident record including any highlights from the agent annual report and student satisfaction survey results.

(20) Present all data as listed in clause 19 to the Regional Directors, Global and Domestic Student Recruitment for their input and recommendation on any changes in remuneration package, change of agreement term, agreement renewal/termination, and other appropriate actions.

(21) Review data and recommendations from Regional Directors, Global and Domestic Student Recruitment with Executive Director, International, and Director, International Operations for final recommendation to the Chief Student Recruitment Officer (Global and Domestic).

(22) Present final recommendations to the Chief Student Recruitment Officer (Global and Domestic) for sign off on any change to agent's network.

(23) Update agent database accordingly and inform the Global and Domestic Student Recruitment, Admissions, and Central Finances Services team of any change as appropriate.

(24) Issue agreements or correspondence such as warning / termination letters and upload all relevant documents to [TRUTH](#) and Studylink.

Regional Directors, Global and Domestic Student Recruitment

(25) Review agent's performance based on the above reports and data prepared by the International Compliance Manager. Make recommendations and provide justification on changes to the agent network that are in line with the University's Agent Management Strategy and the University's risk profile. This may include:

- a. Change to remuneration package;
- b. Change to contractual term;
- c. Renewal/termination of agent's contract; and/or
- d. Correspondence to be issued.

(26) Address any matters arising from the review with agents as appropriate, including follow-up phone calls/emails to inform agents of the change.

Director, International Operation and Executive Directors, International

(27) Review findings prepared by the International Compliance Manager and recommendations from Regional Directors, Global and Domestic Student Recruitment for recommendation to the Chief Student Recruitment Officer (Global and Domestic).

Part C - Agent Compliance Incident Management

Admissions Officer

(28) Identify compliance incident including fraudulent documents, document irregularity, dishonest or deceptive practice, agent mishandling of the application, or potential non-Genuine Temporary Entrant (non-GTE) applicant.

(29) Refer incident to International Compliance Manager, or Regional Directors, Global and Domestic Student Recruitment as appropriate.

International Compliance Manager

(30) Investigate any actual or potential agent compliance incidents by communicating with the stakeholders involved and review any evidence or findings.

(31) Review the evidence or findings with the Regional Directors, Global and Domestic Student Recruitment and determine first course of actions where response from the agent is required.

(32) Invite agent to respond to the initial findings within two (2) weeks of sending the correspondence to the agent.

(33) Review agent's response with Regional Directors, Global and Domestic Student Recruitment and make recommendations on the appropriate actions to Executive Director, International, and Director, International Operations if non-compliance is confirmed, including:

- a. issuing formal warning and suggesting immediate remedial and preventative actions; or
- b. suspension or termination of Agent Agreements.

(34) Submit final recommendations to Chief Student Recruitment Officer (Global and Domestic) for approval in the event of a suspension or termination of Agent Agreement, and issue the relevant correspondence to agent once the final decision is made.

(35) Notify the relevant University staff of the actions or decisions as appropriate and upload relevant documentation to [TRUTH](#).

(36) Update internal systems and the relevant University staff to reflect any suspension/termination status and note the compliance incident on AscentOne (from October 2019 onward – Studylink).

Regional Directors, Global and Domestic Student Recruitment

(37) Review findings on the agent's compliance incidents with the International Compliance Manager and make appropriate recommendation.

(38) Address any matters arising from the review with agents if necessary e.g. follow-up phone calls/emails, and provide the necessary training and monitoring of agent's performance where appropriate.

(39) Provide feedback from investigation and discussion to International Compliance Manager.

Director, International Operations and Executive Director, International

(40) Review findings and recommendations from the International Compliance Manager to determine the appropriate action and for recommendation to the Chief Student Recruitment Officer (Global and Domestic) in the event of a suspension or termination of Agent Agreement.

Part D - Agent Non-renewal and Termination

International Compliance Manager

(41) Where it is determined that the University may wish to exit the Agent Agreement with an agent, review the situation with the Regional Directors, Global and Domestic Student Recruitment and present recommendation and findings to the Executive Director, International and Director, International Operations for a final recommendation to the Chief Student Recruitment Officer (Global and Domestic).

(42) The University may decide to exit an Agent Agreement with an agent in the following situations:

- a. an agent continually fails to meet their Key Performance Index despite warnings and adequate support from the Regional Directors, Global and Domestic Student Recruitment;
- b. an agent has breached the terms and conditions of the Agent Agreement;
- c. an agent has been found to conduct dishonestly and unethically, including submission of fraudulent documentation;
- d. an agent is considered to contribute high immigration and reputational risks to the University;
- e. following the Annual Performance Review, an agent's agreement is deemed not renewable when it expires; or
- f. other performance issues as determined by the relevant staff.

(43) Receive decision/approval of non-renewal or termination of an Agent Agreement from the Chief Student Recruitment Officer (Global and Domestic) following an appraisal of the agent performance or investigation into a breach of contract.

(44) Issue a letter to notify agent of the decision in accordance with the terms of the Agent Agreement, giving the following notice:

- a. In the event of termination due to non-renewal: per the existing Agent Agreement's term end date;
- b. In the event of termination due to non-performance: 60 days; or
- c. In the event of termination due to breach of contract: immediate effect.

(45) Inform the relevant staff from Global and Domestic Student Recruitment, Admissions and Central Finance Services of the non-renewal or termination for their records.

(46) Remove agent from the relevant systems including the Student Administration system (Agent and Office Codes); StudyLink Admissions system and application portal; UAC application system; Agent Commission Database; Freight provider online ordering system; Ascent One Agent Management system.

(47) Upload all relevant documentation and correspondence in Studylink and [TRUTH](#).

Director, International Operations and Executive Director, International

(48) Review findings prepared by the International Compliance Manager for recommendation to the Chief Student Recruitment Officer (Global and Domestic).

Section 4 - Guidelines

(49) Nil.

Section 5 - Definitions

(50) Commonly defined terms are located in the University Glossary. The following definitions apply for the purpose of this Policy:

- a. Agent (international education agent) means a commercial entity engaged by the University via a formal agreement to undertake approved international student recruitment activities on behalf of the University, where they are paid a commission for a successful placement.
- b. International Education Agent Agreement (agent agreement) means the formal contract between the University and the agent outlining the terms and conditions under which the services of the agent are provided.

Status and Details

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