

International Education Agent Management Procedure

Section 1 - Purpose

(1) In accordance with the terms of the international education agent agreement (Agent Agreement) for an international education agent (Agent), 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 Agents (Part A);
- b. ensuring that Agents perform to the required standards and targets as set out by the Future Students team 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 Agent Agreement term (Part D).

Scope

(2) This Procedure applies to all University staff, contractors, and 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 Agent Manager

(4) The International Agent Manager is responsible for:

- a. liaising with the potential Agents identified by the Regional Directors, Future Students, to complete application forms and collect all required documentation;
- b. performing the necessary due diligence checks as provided on the Macquarie Representative Application Form for the Agent (and any sub-Agents) including:
 - i. company registration (ABN confirmation or registration number if a foreign company; business registry on government websites);
 - ii. location of the head office, branches and the territory/ies that the Agent will recruit students from;

- iii. company website;
 - iv. agency structure, such as whether the Agent is a company or an individual;
 - v. evidence of Agent knowledge in relation to the Australian education framework and relevant legislation, for example, Qualified Education Agent Counsellor (QEAC);
 - vi. experience/profile of the company director (Director's Curriculum Vitae);
 - vii. company profile and business plan, including recruitment and marketing strategies;
 - viii. fees and charges for clients where applicable;
 - ix. two (2) referee's reports (as nominated by the Agent); and
 - x. recruitment performance for the nominated institutions.
- c. reviewing the recommendations of the Regional Directors, Future Students, discussing and clarifying any areas of concern, and any additional training or qualifications necessary, and recommending remuneration;
 - d. if due diligence findings are positive, providing application information, findings, and recommendation to the Manager, International Admissions and the Executive Director, International for their review and recommendation. The International Agent Manager is responsible for confirming whether any sub-Agent will be included in the assessment;
 - e. declaring any actual, potential, or perceived conflicts of interest in accordance with the checklist provided by the Chief Procurement Officer – Strategic Procurement, and consulting with them where any such conflicts are declared;
 - f. if the findings are not positive, confirming refusal of the application with the Regional Directors, Future Students, and the Executive Director, International;
 - g. if an Agent appointment is recommended, preparing the Agent Agreement on the appropriate template for the approval and signature of the Pro Vice-Chancellor (Future Students);
 - h. creating Agent profiles and codes on all relevant systems, including:
 - i. the student administration system (Agent and Office Codes);
 - ii. the StudyLink admissions system and application portal;
 - iii. the Universities Admissions Centre (UAC) application system (as required);
 - iv. the University's Agent Commission Database;
 - v. the Ascent One Agent Management system; and
 - vi. PRISMS, ensuring the Agency (head office) as well as any branches in the approved territory/ies have profiles created;
 - i. issuing the Agent Agreement to the Agent and once returned, completing Ascent One set-up to ensure the Agent details are displayed on the University's website and relevant documents and commission details are recorded; and
 - j. uploading the final executed Agent Agreement or refusal letter and related documentation to [TRUTH](#).

Regional Directors, Future Students

(5) The Regional Directors, Future Students are responsible for:

- a. notifying the International Agent Manager when a potential Agent is identified, or an application request is received;
- b. following-up with individual Agents on pending documents to facilitate the application process;
- c. following receipt of completed applications, making recommendations to the International Agent Manager on the following:
 - i. quality and experience of the Agent;
 - ii. strategic reasons for appointing another Agent;
 - iii. ability to appropriately service another Agent; and

- iv. remuneration package, including relativities in market;
- d. ensuring site visits are conducted as part of due diligence and Macquarie University specific training, promotional materials, and Agent portal access are provided after contract commencement; and
- e. declaring any actual, potential, or perceived conflicts of interest in accordance with the checklist provided by the Chief Procurement Officer – Strategic Procurement, and advising the International Agent Manager where any such conflicts are declared.

Manager, International Admissions and Executive Director, International

(6) The Manager, International Admissions and the Executive Director, International are responsible for reviewing findings prepared by the International Agent Manager, and recommendations from the Regional Directors, Future Students, and for submitting a recommendation to the Pro Vice-Chancellor (Future Students) for final review and approval.

(7) The Manager, International Admissions and the Executive Director, International must also declare any actual, potential or perceived conflicts of interest in relation to their recommendation.

Part B - Agent Performance Review

International Agent Manager

(8) The International Agent Manager is responsible for:

- a. forwarding the following reports to the Regional Directors, Future Students, in preparation for the review in October each year:
 - i. Student Satisfaction Survey Report;
- b. collating relevant Agent performance data in November each year for review, including:
 - i. Agent remuneration information;
 - ii. Agent recruitment statistics;
 - iii. Student weighted average mark (WAM);
 - iv. Student attrition rate;
 - v. Year-on-year growth in conversion rates;
 - vi. visa refusal data (if any); and
 - vii. compliance incident records including any highlights from the Student Satisfaction Survey results;
- c. presenting all of the data listed in clause 7(b) to the Regional Directors, Future Students, for their input and recommendation on any changes in remuneration package, change of Agent Agreement term, Agent Agreement renewal/termination, and other appropriate actions;
- d. reviewing the data and recommendations from the Regional Directors, Future Students, with the Executive Director, International, and Head of Admissions and Scholarships for final recommendation to the Pro Vice-Chancellor (Future Students);
- e. presenting the final recommendations to the Pro Vice-Chancellor (Future Students) for sign off on any change to the Agent's network;
- f. updating the Agent database accordingly and informing the Future Students, Admissions and Scholarships, and Central Finances Services teams of any changes as appropriate;
- g. issuing Agent Agreements or correspondence such as warning/termination letters and uploading all relevant documents to [TRUTH](#) and StudyLink; and
- h. coordinating with Group Finance and Admissions to collect, verify and collate information relating to education agent commissions, where requested by the Secretary of the Department of Education under the [Education Services for Overseas Students Act 2000](#), and to provide that information to the Secretary in the format and

timeframe specified, including:

- i. the total monetary commissions paid to each Agent during the specified reporting period;
- ii. the value and description of any non-monetary commissions or benefits provided to each Agent; and
- iii. the number of accepted students recruited by each Agent.

Regional Directors, Future Students

(9) The Regional Directors, Future Students, are responsible for:

- a. reviewing the Agent's performance based on the above reports and data prepared by the International Agent Manager;
- b. making recommendations and providing justification for 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:
 - i. changes to remuneration package;
 - ii. changes to contractual term;
 - iii. renewal/termination of an Agent's contract;
 - iv. correspondence to be issued; and
- c. addressing any matters arising from the review with the Agent as appropriate, including follow-up phone calls/emails to inform the Agent of any changes.

Head of Admissions and Scholarships (or suitable nominee) and Executive Director, International

(10) The Head of Admissions and Scholarships (or suitable nominee) and the Executive Director, International are responsible for reviewing the findings prepared by the International Agent Manager, and recommendations from the Regional Directors, Future Students, for recommendation to the Pro Vice-Chancellor (Future Students).

Pro Vice-Chancellor (Future Students), Head of Admissions and Scholarships and Executive Director, International

(11) The Pro Vice-Chancellor (Future Students), the Head of Admissions and Scholarships and the Executive Director, International, are jointly responsible for ensuring that commission payment arrangements set out in the Agent Agreement are administered at all times in compliance with the University's obligations under the [Education Services for Overseas Students Act 2000](#) and the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#), including restrictions on education agent commissions and the prohibition on paying commissions for onshore student transfers. These obligations apply across all relevant University staff involved in admissions assessment, agent management, and commission administration.

Part C - Agent Compliance Incident Management

Admissions Officers

(12) The Admissions Officers are responsible for:

- a. identifying any compliance incidents, including fraudulent documents, document irregularity, dishonest or deceptive practice, agent mishandling of the application, or potential non-Genuine Students (non-GS) applicants; and
- b. referring any incidents to the International Agent Manager, or Regional Directors, Future Students, as appropriate.

International Agent Manager

(13) The International Agent Manager is responsible for:

- a. investigating any actual or potential Agent compliance incidents by communicating with the stakeholders involved and reviewing any evidence or findings;
- b. reviewing the evidence or findings with the Regional Directors, Future Students, and determining the first course of action where a response from the Agent is required;
- c. inviting the Agent to respond to the initial findings within two (2) weeks of sending the correspondence to the Agent;
- d. reviewing the Agent's response with Regional Directors, Future Students, and making recommendations on the appropriate actions to the Head of Admissions and Scholarships, and the Executive Director, International if non-compliance is confirmed, including:
 - i. issuing a formal warning and suggesting immediate remedial and preventative actions; or
 - ii. suspending or terminating the Agent Agreement;
- e. submitting final recommendations to the Pro Vice-Chancellor (Future Students) for approval in the event of a suspension or termination of the Agent Agreement, and issuing the relevant correspondence to the Agent once the final decision is made;
- f. notifying the relevant University staff of the actions or decisions as appropriate and uploading relevant documentation to [TRUTH](#); and
- g. updating internal systems and the relevant University staff to reflect any suspension/termination status and note the compliance incident on StudyLink.

Regional Directors, Future Students

(14) The Regional Directors, Future Students, are responsible for:

- a. reviewing the findings on the Agent's compliance incidents with the International Agent Manager and making appropriate recommendations;
- b. addressing any matters arising from the review with the Agent if necessary, for example, follow-up phone calls/emails, and providing the necessary training and monitoring of the Agent's performance where appropriate; and
- c. providing feedback from investigation and discussion to the International Agent Manager.

Head of Admissions and Scholarships, and Executive Director, International

(15) The Head of Admissions and Scholarships, and the Executive Director, International are responsible for reviewing the findings and recommendations from the International Agent Manager to determine the appropriate action, and for recommendation to the Pro Vice-Chancellor (Future Students) in the event of a suspension or termination of the Agent Agreement.

Part D - Agent Non-renewal and Termination

(16) Where it is determined that the University may wish to exit the Agent Agreement with an Agent, the International Agent Manager must review the situation with the Regional Directors, Future Students, and present recommendations and findings to the Head of Admissions and Scholarships, and the Executive Director, International for a final recommendation to the Pro Vice-Chancellor (Future Students).

(17) 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, Future Students;

- 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 to 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.

International Agent Manager

(18) The International Agent Manager is responsible for:

- a. receiving decision/approval of non-renewal or termination of an Agent Agreement from the Pro Vice-Chancellor (Future Students) following an appraisal of the Agent's performance or investigation into a breach of contract;
- b. issuing a letter to notify the Agent of the decision in accordance with the terms of the Agent Agreement, giving the following notice:
 - i. in the event of termination due to non-renewal: per the existing Agent Agreement's term end date;
 - ii. in the event of termination due to non-performance: 30 days; or
 - iii. in the event of termination due to breach of contract, the University may terminate the Agent Agreement immediately;
- c. informing the relevant staff from Future Students, Admissions and Scholarships, and Group Finance of the non-renewal or termination for their records;
- d. removing the Agent from the relevant systems, including:
 - i. the student administration system (Agent and Office Codes);
 - ii. the StudyLink admissions system and application portal;
 - iii. Universities Admissions Centre (UAC) application system (if applicable);
 - iv. the University's Agent Commission Database;
 - v. the Ascent One Agent Management system; and
- e. uploading all relevant documentation and correspondence in StudyLink and [TRUTH](#).

Head of Admissions and Scholarships and Executive Director, International

(19) The Head of Admissions and Scholarships and the Executive Director, International are responsible for reviewing the findings prepared by the International Agent Manager for recommendation to the Pro Vice-Chancellor (Future Students).

Section 4 - Guidelines

(20) Nil.

Section 5 - Definitions

(21) The following definitions apply for the purpose of this Procedure:

- a. Agent (international education agent) means an entity that:
 - i. engages in any of the following activities in relation to a provider:
 - the recruitment of overseas students, or intending overseas students;

- providing information, advice or assistance to overseas students, or intending overseas students, in relation to enrolment;
- otherwise dealing with overseas students, or intending overseas students; and

ii. is not a permanent full-time or part-time officer or employee of the provider*.

b. Agent Agreement (international education 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.

*For the purposes of this Procedure, the following groups are not considered to fall within the definition of an Agent:

- a. onshore casual staff of the University; and
- b. offshore-based contractors engaged by the University.

This position is supported by Department of Education guidance indicating that activities of a general nature, not connected to any individual overseas student or intending overseas student, may fall outside the definition of an education agent, and that exceptions may include overseas or senior staff engaged on long-term contracts with a provider.

Status and Details

Status	Current
Effective Date	16th June 2026
Review Date	16th June 2031
Approval Authority	Deputy Vice-Chancellor (People and Operations)
Approval Date	10th June 2026
Expiry Date	Not Applicable
Responsible Executive	Eric Knight Deputy Vice-Chancellor (People and Operations)
Responsible Officer	Lee-ann Norris Pro Vice-Chancellor (Future Students) +61 2 9850 7665
Enquiries Contact	Kanami Torii International Agent Manager