SOUTHERN ACADEMY OF
HIGHER EDUCATION

Southern Academy of Higher Education (SAHE)

Education Agent Management Policy

Table of Contents

1. Policy Statement 3
2. Scope 3
3. Policy Principles 3
4. Procedures 3
5. Agent Duties 4
6. Monitoring and Compliance 5

1. Policy Statement

The Education Agent Management Policy (the 'Policy') outlines the Southern Academy of Higher Education's ('SAHE' or the 'Academy') commitment to ensuring its compliance with the Education Services for Overseas Students (ESOS) ACT (2000), the Agent Code of Ethics and the National Code 2018. The purpose of this Policy is to ensure consistent and effective management of the education agents (Agents) engaged by SAHE.

1.1 Definitions

For definitions, please refer to the '*Dictionary of Terms*'.

2. Scope

This Policy applies to:

a. Agents appointed by SAHE to represent the Academy and its program;
b. Agents representing prospective or enrolled students of SAHE; and
c. Agents seeking to become registered Agents for SAHE.

3. Policy Principles

SAHE will engage and manage Agents to:

a. support the Academy's student recruitment objectives;
b. provide clarity in management responsibility both internally and to appointed Agents;
c. ensure the Academy and prospective students receive high levels of service;
d. ensure transparent, fair and ethical dealings with prospective students;
e. maintain compliance with policies, procedures and broader legislative requirements related to the promotion of the SAHE program of study.

4. Procedures

4.1 Agent Appointment

a. Individuals or organisations may apply to the Academy to become a Registered Agent.
b. The Academy may also strategically approach Agents directly and invite them to become an agent for the Academy.
c. SAHE will collect agent information and data including business registration, company profile, reference contact details and copies of any accreditation certificates.
d. The Dean, in consultation with the Marketing Manager, will be responsible for reviewing and approving the agent's application.
e. Agents who are assessed as meeting the requirements of the Academy and the requirements of the National Code will be offered a written *Agent Agreement* to represent the Academy and promote the program of study to recruit quality students who meet admissions, student visa and Genuine Temporary Entrant (GTE) requirements.
f. SAHE will publish an up-to-date list of authorised Agents on the Academy website, maintain records of agreements and enter and maintain each agent's details in Provider Registration and International Student Management System (PRISMS).

4.2 Agent Monitoring and Review

a. Agents engaged by the Academy will receive a comprehensive training manual including information relating to international education in Australia, Australian requirements for and conditions of student visas, SAHE's program and majors, administrative procedures and forms.

b. The Marketing Manager will undertake regular agent monitoring using data from internal databases, PRISMS and student feedback.

c. The Marketing Manager will undertake the formal monitoring and review of Agents immediately prior to the expiry of *an Agent Agreement*, as part of the renewal process. Review performance will include:

i. the agent's compliance with the *Agent Agreement* and any conditions placed on the agent by the Academy;
ii. analysis of quality and quantity of applications on behalf of prospective students;
iii. analysis of conversion rates from application to offer, offer to acceptance, and acceptance to commencement;
iv. analysis of visa grants, refusals and cancellations for the Academy;
v. analysis of student transfers, deferments and suspensions;
vi. adherence to the Academy's admissions processes and completeness of applications;
vii. conduct of students once enrolled, including instances of academic misconduct, general misconduct, non-payment of fees and visa breaches;
viii. analysis of instances where students claim to have been misinformed by the agent about their studies at SAHE;
ix. analysis of instances where the agent has shown a lack of knowledge of the Academy, student visa requirements or other matters relating to a student's stay in Australia.

d. Following the annual review of each agent, or identification of negligence or non-compliance through ongoing monitoring, the Marketing Manager will provide a report summarising the performance of each agent and recommended actions to the Dean. The Dean will approve one of the following actions:

i. renewal of agreement;
ii. non-renewal of agreement;
iii. termination of the agreement; or
iv. further training or corrective action.

e. The Dean will present an annual report to the Governing Council on the outcomes of the monitoring and review process of the authorised Agents of the Academy.

4.3 Agent Termination

a. If an agent has been found to have acted dishonestly, with negligence, carelessly or incompetently, or has been engaged in false, misleading or unethical advertising and recruitment practices, the Academy may advise the agent of further training, corrective action or immediately terminate the agent in accordance with the terms of the *Agent Agreement* and report the termination of the agent via PRISMS.

4.4 Agent Fees

a. SAHE will pay Agents a commission for the recruitment of each new student. The commission rate and conditions will be decided by the Dean on an annual basis. A report will be provided by the Dean to the Governing Council if there are major changes made to the commission rates of the Agents.

b. The written *Agent Agreement* will specify the commission to be paid for the successful enrolment of each student and the conditions of payment.

5. Agent Duties

a. Agent use of the SAHE name and logo:

i. SAHE will ensure consistent, compliant and professional use of the SAHE logo, and visual branding in accordance with the *Marketing Plan*;
ii. SAHE authorised agent must agree to only advertise the provision of the program specified in the *Agent Agreement* and CRICOS Provider Number must appear in all written and electronic material;
iii. all requests for use of the relevant SAHE logo must be emailed to the Marketing Manager for approval.

b. The responsibilities of the agent are stipulated in the written *Agent Agreement*. The *Agent Agreement* outlines an Agent's obligations in relation to the rules and regulations as set out in the ESOS Act (2000) and National Code (2018), recruitment rules, promotional activities, fees, privacy and conduct.

6. Monitoring and Compliance

Through the active review of reports from the Dean and the Marketing Manager, the Governing Council will actively monitor compliance with the ESOS Act (2000), the National Code (2018), the Agent's Code of Ethics and the terms of the *Agent Agreement* with SAHE, on an ongoing basis.

Version Control

Version	v1.1
Review	The Governing Council will review this Policy in accordance with the Southern Academy of Higher Education *Policy Documents Review Schedule*.
Approving Body	Governing Council
Approval and Effective Date	4 May 2023
Policy Custodian	Dean
Policy Contact	Dean
Higher Education Standards Frameworks (Threshold Standard) 2015 (Cth)	B1.1 "Higher Education Provider" Category Standard 7.1
Benchmarking Institutes	Federation University University of New South Wales Australian Institute of Higher Education Charles Sturt University King's Own Institute Australian National University La Trobe University Kaplan Business School Australia
Related Document	Dictionary of Terms Marketing Plan Delegation of Authority Policy
Related Legislations	Higher Education Standards Framework (Threshold Standards) 2021 (Cth); Tertiary Education Quality and Standards Agency Act 2011 National Code 2018 Australian Qualifications Framework (AQF) Standards for Registered Training Organisations (RTOs) Migration Act 1958

	Australian International Education and Training Agent Code of Ethics