International Representation Policy

1. Purpose

This policy articulates the role and functions of international representatives ("representatives") and the framework for their appointment and management. Through this policy, the institution demonstrates its commitment to ensuring that representation of its educational offerings and experiences is transparent, accurate, monitored and operating in accordance with regulatory requirements.

2. Scope

This policy applies to all representatives appointed by the institution.

3. Definitions

See Glossary of Terms.

4. Policy statement

4.1 Overview

- 4.1.1 Individual persons or organisations, in Australia or overseas, may be engaged by the institution in the capacity of representatives, to assist the institution in recruiting international students.
- 4.1.2 Representatives represent the institution only for international student recruitment and must not represent themselves as having any other function, unless otherwise specified in a current written agreement with the institution.
- 4.1.3 Representatives must abide by the requirements of the written agreement and be aware of the institutions' and their own responsibilities in complying with the requirements of the *ESOS Act*, the *National Code* and *HESF*.

4.2 Appointing representatives

4.2.1 Representatives are appointed by entering into written agreements with the institution. To become an approved representative the prospective applicants will

need to apply, be assessed and approved in accordance with the *Representative Engagement and Appointment Procedures* and the *Delegations of Authority*.

- 4.2.2 Representative agreements are active for a period of two years unless otherwise stated and must comply with the institution's policies and Australian Government legislation, including maintaining and updating a list of representatives on PRISMS, and as requested by Government agencies and the institution's website.
- 4.2.3 Representatives are remunerated by various means, including direct payment for particular time-specific services and payment of commission based on enrolments, as stipulated in their individual written agreements.

4.3 Training of representatives

- 4.3.1 Newly appointed representatives will receive a training package by the institution's Marketing and Recruitment Department. In addition to institutional specific information, the training must ensure representatives have the appropriate knowledge and understanding of the international education system in Australia including the Australian International Education and Training Agent Code of Ethics.
- 4.3.2 All representatives will receive additional updates as required, including information on new courses and legislative changes. In-person training may occur when the institution's staff conduct a site visit.
- 4.3.3 All training activities are recorded in the institution's database in accordance with the *Training of Representative Procedures*.

4. Monitoring representatives

- 4.4.1 The institution is committed to monitoring the activities and performance of all representatives while ensuring the representatives are providing accurate information to students about the institution. The annual monitoring of representatives will constitute the basis for the renewal/non-renewal of representative's agreements.
- 4.4.2 Monitoring of representatives is conducted using various methods, as detailed in the *Monitoring Representatives and Agreement Renewal Procedures* and representative agreements, including key performance

indicators as follows:

| Category: | Key performance indicators: |
|--|---|
| Pre-enrolment | Quality of applications: • Overall number of applications • Offer versus enrolment conversion rate • Number of offers granted • Percentage of visas granted |
| Course enrolment | Academic performance: • Confirmation of Enrolment (COE) completion rates • Graduation rate |
| Adherence to contractual obligations | Written agreement: • Abide by the roles and responsibilities • Comply with the agreement |
| Feedback & complaints from applicants/students | Complaint received from applicant/student Specific feedback from alumni |

- 4.4.3 Corrective action will be taken where the monitoring report deems a representative has not met their obligations, as required by the *National Code*. The Marketing and Recruitment Department will advise the representative of the outcome of the annual review and corrective action plan if applicable.
- 4.4.4 Monitoring of representatives may also occur on an ad hoc basis where it is deemed necessary, and subsequent corrective action prescribed.

4. Termination of an agreement

4.1 The institution will terminate a representative agreement, as per the Representative Agreement Termination Procedures, where there is evidence the representative, an employee or a sub-contractor of the representative has participated in false or misleading recruitment practices, as required by the National Code. Additional grounds for terminating an agreement are detailed in representative agreements.

5. Roles and responsibilities

- 5.1 The Senior Vice President (Domestic and International Development) is the Responsible Officer of this policy.
- 5.2 The Marketing and Recruitment Department has responsibility for implementing the policy and procedures, including ongoing compliance with legislation and monitoring performance and activities of representatives.

6. Related and superseded documents

Monitoring Representatives and Agreement Renewal Procedures

Representative Agreement Termination Procedures

Representative Engagement and Appointment Procedures

Training of Representative Procedures

Approved by the Board of Directors on 7 December 2020.