

# International Representation Policy

## 1. Purpose

This policy outlines the roles and responsibilities of international representatives (“representatives”) and the framework for their appointment and management. It ensures that the representation of the Institution’s educational offerings and experiences are transparent, accurate and operating in accordance with regulatory requirements. This policy highlights the Institution’s commitment of ensuring its representatives act ethically, honestly and in the best interests of international students and uphold the reputation of Australia’s international education sector.

## 2. Scope

This policy applies to all representatives appointed by the Institution.

## 3. Definitions

See *Glossary of Terms*.

## 4. Policy statements

### 4.1 Overview

4.1.1 Individual persons or organisations, in Australia or overseas, may be engaged by the Institution as a representative (also known as agents), to assist with the recruitment of international students.

4.1.2 Representatives are only authorised to recruit international students who are genuine and engaged in learning, and must not claim to have any other role unless specified in a written agreement with the Institution.

4.1.3 Representatives must abide by the requirements of the written agreement and understand their responsibilities and those of the Institution under the *ESOS Act*, the *National Code* and *Higher Education Standards Framework (Threshold Standards)*, *Foundation Standards* and *TEQSA Act*.

## **4.2 Appointing representatives**

4.2.1 Representatives are appointed through a written agreement with the Institution. Prospective applicants must apply, be assessed and be approved in accordance with the *Representative Engagement and Appointment Procedures*.

4.2.2 Representative agreements are valid for two years unless otherwise stated. They must comply with the Institution's policies and Australian 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 outlined in the written agreement.

## **4.3 Training of representatives**

4.3.1 Newly appointed representatives receive a training package from the Institution's International Development team. This training covers specific institutional information, latest legislative changes and best practices in international education. The Institution ensures that representatives understand the international education system in Australia including the Australian International Education and Training Agent Code of Ethics.

4.3.2 All representatives are provided with updates as required, including information on new courses and legislative changes. In-person training may occur during staff site visits.

4.3.3 All training activities are recorded in the Institution's database in accordance with the *Training of Representative Procedures*.

## **4.4 Monitoring representatives**

4.4.1 The Institution monitors the activities and performance of all representatives through regular reviews and feedback mechanisms to ensure they provide accurate and non-misleading information to students. Annual monitoring determines whether representative agreements are renewed.

4.4.2 Representatives are monitored using various methods, as detailed in the *Monitoring Representatives and Agreement Renewal Procedures* and

representative agreements. Key performance indicators include:

| Category:                                      | Key performance indicators:  |
|--|--|
| Pre-enrolment                                  | Quality of applications: <ul style="list-style-type: none"><li>• Overall number of applications</li><li>• Offer versus enrolment conversion rate<ul style="list-style-type: none"><li>• Number of offers granted</li><li>• Percentage of visas granted</li></ul></li></ul> |
| Course enrolment                               | Academic performance: <ul style="list-style-type: none"><li>• Confirmation of Enrolment (COE) completion rates</li><li>• Graduation rate</li></ul>   |
| Adherence to contractual obligations           | Written agreement: <ul style="list-style-type: none"><li>• Abide by the roles and responsibilities</li><li>• Comply with the agreement</li></ul>   |
| Feedback & complaints from applicants/students | <ul style="list-style-type: none"><li>• Complaint received from applicant/student</li><li>• Specific feedback from alumni</li></ul>  |

4.4.3 Corrective action is taken if a representative does not meet their obligations, as required by the *National Code* or the written agreement. The International Development team informs the representative of the outcome of the annual review and any corrective action plan if applicable.

4.4.4 Representatives may also be monitored on an ad hoc basis when necessary with corrective action taken as needed.

## **4.5 Termination of an agreement**

4.1 The Institution terminates a representative agreement, as per the *Representative Agreement Termination Procedures*, if there is evidence of poor performance or false or misleading recruitment practices by the representative, an employee or a sub-contractor, as required by the *National Code*. Additional grounds for termination are detailed in the written 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 International Development team has responsibility for implementing the policy and procedures, including ongoing compliance with legislation and monitoring performance and activities of representatives.

## **6. Related 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 18 March 2025**