

Overview

As a registered provider to international students, UNE must comply with the National Code 2018 Standard 4: Education Agents in relation to its recruitment Agents.

In relation to its Agents, UNE must:

- have a written agreement with each education Agent they engage with;
- enter and maintain education Agent details in PRISMS;
- ensure education Agents have appropriate knowledge and understanding of the Australian International Education and Training Agent Code of Ethics;
- ensure education Agents act honestly and in good faith;
- take immediate corrective action, or terminate a relationship if an Agent (or an employee or subcontractor) is not complying with the National Code; and
- not accept overseas students from an education Agent if it knows or suspects that the education Agent is engaging in unethical recruitment processes

UNE maintains written agreements with education Agents that outline both UNE's and the Education Agent's obligations under that agreement relating to marketing to and recruitment of international student's, Agent performance and remuneration:

<https://www.une.edu.au/study/international/agents/information-for-agents>

Agents are required to be aware and knowledgeable of the [Education Services for Overseas Students Act 2000](#) (ESOS Act) including the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

UNE International (via the Director, International) is currently responsible for ensuring that UNE's agent network is managed effectively and in accordance with UNE policies and procedures and the required governing legislation.

Procedures

1. Agent Assignment

UNE has a written agreement with each of its Education Agents. UNE undertakes due diligence in assigning a new or renewing an existing education Agent to represent UNE in relation to International Student recruitment. [Appendix 6.1]

Agent application process

Agents can submit an EOI via the UNE website

<https://www.une.edu.au/study/international/agents/information-for-agents> EOI's are assessed 4

times per year and, if the recruitment team want to continue, then the Agent will be contacted and sent UNE's Agent Application Form.

The recruitment team may also initiate discussions with an education Agent prior to the Agent submitting an EOI. If the Agent is deemed suitable to continue then they will be sent an application form.

UNE International staff vet the Agents at this stage via the following:

- Checking the Agent's website content
- Discussions with the potential Agent on recruitment practices, marketing practices, recruitment regions and recruitment numbers.
- Market data on the Agent, including but not limited to: Australian institutions engaging the Agent, known compliance issues, PRISMS Agent data, location of Agent and current state of that market
- Number of Agents in region already contracted to UNE
- Size of Agent and operation model
- Location of headquarters: Onshore, Offshore or both

Unsuccessful Agents are notified via email.

Application assessment

The Agent is required to complete UNE's Agent Application Form and supply supporting evidence and documentation relating to the following:

- Two referees – 1 must from an Australian University
- List of institutions they currently represent
- Explanation and understanding of the ESOS Act 2002, the "National Code" and other legislation related to the provision of recruitment services
- Recruitment numbers
- Detailed company profile
- CV of principals and staff
- Business registration certificate

The assessment process involves contacting the Agent's nominated referees and asking them to complete the UNE Agent Referee Check which assesses the following for that particular institution:

- Length of relationship
- Quality of applicants
- Completion rate of applicants
- Visa refusal rate
- Understanding of ESOS
- Post-enrolment Agent support
- Agent administration
- Recommendation
- Any other relevant matters

Once the references have been returned and all supporting evidence has been received, a final assessment is conducted on the suitability of the Agent for UNE.

Application outcome

If the Agent is deemed suitable to represent UNE, then an Agent Agreement will be offered to the Agent.

If the Agent is unsuccessful then the Agent will be notified via email.

Variation to agreements

If any part of the executed agreement needs to be varied, then a variation to the agreement must be completed and signed by both UNE and the Agent.

Variations to agreements may be requested for the following reasons:

- To add or remove contracted territories
- To amend the length of the agreement

Agreement renewal

Agent Agreements have a term of 1 or 2 years and are not automatically renewed. When an Agent's agreement is due to expire, they will be added to the next Agent Review Meeting as a renewal consideration. The Agent performance data for this Agent over the entire duration of their contract will be examined and a decision will be made to offer a renewal or to let them expire.

- If it is decided to renew the Agent:
 - The recruitment team will decide on a 1- or 2-year term; and
 - The application to assign a new Agent is followed.
- If it is decided that the Agent will not be renewed:
 - The Agent is unlinked in Ascentone;
 - Any existing applications in the Ascentone admissions system will be processed according to their agreement if they were received before the agreement expired; and
 - International Admissions Manager is notified of the decision.

2. Agent Management and Training

Agent Management

The International Recruitment team will be responsible, under the direction of the Director, International, for the management of the Agent network assigned to them. That recruitment team member will be the point of contact for the Agent in relation to providing the Agent UNE marketing resources, training and training materials and the monitoring of Agent recruitment practices, activities and performance. [Appendix 6.2]

The recruitment team member will formally undertake the following with each contracted Agent:

- Recruitment planning and events
- Performance management
- Counsellor training
- Review recruitment practices
- Agent monitoring

The recruitment team will provide trip reports for all in-person Agent office visits.

Agent review

The recruitment team meet each quarter, or when the need arises, to undertake a review of the results of the Agent monitoring process. Each Agent will be discussed, and any issues will be raised for actioning.

Each meeting will assess the following for each Agent:

- Performance data
- Agreement renewals/non-renewals
- Disciplinary and Corrective Actions

Agent review actions are recorded on the Agent management Microsoft Teams site.

Agent Training

UNE must provide the Agent with up to date and accurate course and other relevant information to enable the Agent to conduct their services including the Genuine Student (GS) requirements. This includes providing information and training on the following:

- Academic and English Language requirements
- Genuine Student requirements
- UNE policy and procedures
- Information relevant to Student Visa requirements
- Marketing and compliance

Training sessions can be conducted in person in country or online.

3. Agent Monitoring

Agent monitoring is an ongoing practice performed throughout the term of an Agent's Education Agreement which undertaken by all areas in UNE International, including marketing, recruitment, admissions and services. Agent monitoring ensures that Agents that UNE engages with are meeting their obligations under their Education Agent Agreement, the ESOS Act and the National Code.

Agent Monitoring encompasses the following:

Agent requirements

- ESOS Act understanding and compliance
- National Code compliance
- Agent agreement – understand obligations under UNE's contract

Application Quality

- % of applicants that meet our academic and English language requirements vs % that are rejected at admission stage
- % of applicants that meet our pre-admission GS screening vs % that are rejected at GS stage
- % of applicants that receive a Positive GS outcome vs % of applicants that receive a Negative GS outcome
- % of applicants that are rejected at admissions or GS stage based on fraud

GS assessment

- Quality of GS documentation
- Understanding of the SSVF and Student Visa framework
- No. of applicants submitting fraudulent documentation

Visa refusal rate

- Does the Agent have an acceptable visa refusal rate as per their Education Agent Agreement

Attrition rate

- % of applicants that have transferred – not released

Completion rate

- % of applicants that have met course requirements and completed

As part of the monitoring process, UNE will access and assess reports from internal and external systems, including:

- PRISMS
 - Agency by CoE Incomplete Rate
 - Agency CoE outcomes
 - Agency Involvement Summary
 - Agent by CoE Incomplete Rate
 - Agent CoE outcomes
 - Agent Involvement Summary
 - Institution Reliance by Agency
 - CoE and Student Export
- Callista
- Business Intelligence Services
- Ascentone (admissions data)

4. Corrective Action

UNE, where necessary, will take immediate corrective action under Clause 11 of the Education Agent Agreement when the Agent is in:

- Breach of their contract
- Breach of the ESOS Act including the National Code 2018.

Agent Notice and disciplinary actions

Agents that have not met UNE International performance measures, or have undertaken actions resulting in a breach, will be subject to the appropriate disciplinary actions.

- On discovery of an incident that may result in a breach, UNE will contact the Agent in relation to the matter and ask for an explanation or required action from the Agent. If the explanation or action from the Agent is not deemed satisfactory, then the Agent will be issued with a Notice of Corrective Action.
- If an Agent has undertaken an action or their performance has resulted in a breach, then UNE will issue a Notice of Corrective Action.

Corrective action may be in the form of the following:

- Additional training
- Probation
- Variation to agreement
- Suspension

After being issued with a corrective action, the Agent will be monitored for a set period of time to ensure that the corrective action has been effective.

A Notice of Termination will be issued (in conjunction with UNE's Legal Office) if an Agent repeatedly fails to rectify non-compliance.

Corrective actions are recorded on the Agent Management Teams site.

5. Commission Payments

UNE commission model

UNE pays commission to its Education Agents in two instalments. The first instalment is for the initial trimester of enrolment and the second instalment is for the second and subsequent trimester of a student's enrolment. Commission is only paid once a student has remained enrolled at the Census Date for the appropriate study period.

Invoice requirements

Agents are required to submit a valid invoice after census date of each eligible trimester and include the following details:

- UNE Student Name
- UNE Student Number
- Course Name
- Commencement date
- Annual Course fees
- Commission amount claimed for instalment
- Commission instalment number: (1of2) or (2of2)

Payment approval process

UNE International checks if a student is correctly enrolled for the trimester that the Agent is claiming the commission for. If the invoice is correct, then International forwards the invoice to Accounts Payable for processing. If the invoice needs amending, then it is sent back to the Agent for correction.

Appendix

5.1 UNE12.01 Appoint International Agents

- 5.1.1 Education Agent Agreement
- 5.1.2 Welcome Letter
- 5.1.3 Agent Certificate
- 5.1.4 Rejection/non-renewal letter
- 5.1.5 Agent application
- 5.1.6 Agent Referee Check
- 5.1.7 Agent Agreement Processing procedure
- 5.1.8 UNE12.02 Manage International Agents
- 5.1.9 Notice of Corrective Action

Administration

Document Type:	Internal Operating Procedure
Administrator:	Director, UNE International
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Responsible parties for review:	International Admissions Manager International Recruitment Officer International Marketing Manager
Approved by:	Director, International

