

A2 Education Pty Ltd t/a



Education Agent Engagement and Monitoring

Policy and Procedure

V2.0

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1. Purpose

The purpose of this policy is to establish the college’s approach to the engagement and monitoring of education agents who provide student recruitment services to the college. This policy ensures:

- (i) education agents are formally engaged as external parties under written agreements;
- (ii) education agents are monitored in a risk-based manner to protect students,
- (iii) integrity is maintained in student recruitment practices, and
- (iv) compliance with the *Standard 4.2 of the Outcome Standards for NVR Registered Training Organisations (2025)*¹, *Standard 17 of the Compliance Standards for NVR Registered Training Organisations 2025*², and *Standard 4 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)*³.

2. Definition

Term	Meaning
College	Matic International College
ASQA	Is the Australian Skills Quality Authority, the Vocational Education and Training (VET) regulator, which regulates the legislation relating to Registered Training Organisations (RTOs)
Code of Conduct	Refers to the college’s Code of Conduct
Disciplinary Action	Is the formal action that can be taken against a college staff or staff member of the education agent for breaching this policy, up to and including termination of employment or in the case of an agent or Contractor, termination of their Agreement or contract with the college and potential legal action.
National Code 2018	Refers to the National Code of Practice for Providers of Education and Training for Overseas Students 2018.

¹ Refer to <https://www.legislation.gov.au/F2025L00354/asmade/text>

² Refer to <https://www.legislation.gov.au/F2025L00355/asmade/text>

³ Refer to <https://www.legislation.gov.au/F2017L01182/latest/text>

RTO Standards 2025	<p>Refers to the Standards for Registered Training Organisations (RTOs) 2025. It comprises of:</p> <ul style="list-style-type: none"> (i) Outcome Standards: https://www.legislation.gov.au/F2025L00354/asmade/text (ii) Compliance Standards or Compliance Requirements: https://www.legislation.gov.au/F2025L00355/asmade/text (iii) Credential Policy: https://content.training.gov.au/sites/default/files/2025-03/Credential%20Policy.pdf
Students	Refers to current or prospective international students of the college
Agreement	Refers to a Third-Party Provider Agreement that an education agent is required to enter into with the college to provide recruitment services in compliance with Standard 4 of the National Code 2018 and Outcome Standard 4.2 of the RTO Standards 2025.
CoE	Confirmation of Enrolment is a document, provided electronically, which is issued by the college to prospective students, and which must accompany their application for a student visa. It confirms the student's eligibility to enrol in the particular course of the college. CoE includes the course of study and time duration in which the course is to be completed by the student.
PRISMS	Refers to Provider Registration and International Student Management System

3. Scope

This policy applies to all education agents engaged by the college for student recruitment activities; and all college staff involved in education agent engagement, communication, monitoring, or oversight.

This policy does not replace contractual obligations but operates in conjunction with formal Education Agent Agreements.

4. Policy Statement

The college recognises that education agents act as representatives of the organisation and play a significant role in student recruitment. Accordingly, the college engages education agents only under a written Education Agent Agreement. It ensures education agents are provided with accurate and approved information to support correct representation of the college and its courses. It monitors education agent conduct using a risk-based approach and takes appropriate and proportionate action where concerns are identified.

5. Engagement of Education Agents

5.1. Nature of Engagement

Education agents are engaged as third parties to provide student recruitment services. Engagement does not create an employment relationship or transfer regulatory responsibility.

5.2. Decision to Engage

The decision to engage an education agent is approved by the Chief Executive Officer (CEO).

5.3. Formal Engagement

An education agent is considered engaged only upon execution of a written Education Agent Agreement. Education agents must not provide student recruitment services on behalf of the college prior to agreement execution.

5.4. Recording of Education Agent Details

Where required under the National Code 2018⁴ and applicable regulatory arrangements, the college records and maintains details of engaged education agents in PRISMS in accordance with relevant requirements.

5.5. Agents Commission

The agent will be eligible for the commission as mentioned in the written agreement. The commission will be paid as per the payment terms and relevant details agreed upon by the agent and the college, and as stated in the agreement.

⁴ Refer to Standard 4.2

In case an onshore international student⁵ has been transferred to another RTO and has commenced his or her studies, then the agent will not be eligible for commission. There are some exceptions to the commission payment related to the transfer of onshore international students, as given below:

- the college will be required to pay commission to the agent if the college accepts the enrolment of an onshore international student on or before 31st March 2026; or
- when an onshore international student has completed his or her principal course of study with the college, after which he or she commences a course with another RTO; or
- when an onshore international student is enrolled in a course, as specified in the CoE, with the college, for which his or her student visa was granted.

6. Monitoring of Education Agents

6.1. Monitoring Approach

The college monitors education agent activities to identify and address potential risks associated with student recruitment services. Monitoring does not imply continuous supervision or guarantee agent compliance but provides oversight proportionate to identified risks. The college, annually, will monitor the education agents' activities, including but not limited to:

- Education Agent Agreements: The agents must provide their services as agreed within the signed agreement. The agreement must be valid and renewed (if applicable).
- Agents Information: The relevant details of authorised agents of the college must be notified to the VET regulator within thirty (30) calendar days of entering into or terminating the written agreement, or prior to the agreement taking effect, whichever occurs first. The relevant details of authorised agents must be entered and maintained in PRISMS. The admission team will be in charge of maintaining the details of the education agents on PRISMS.
- Marketing and relevant materials: The relevant materials used by agents for recruiting students are up-to-date and provide accurate information about the college, its courses, and services.
- Pre-enrolment: The agents must follow the up-to-date pre-enrolment process as per the college's policies and procedures⁶.

⁵ Refers to an international student who has arrived in Australia, on student visa (subclass 500), for undertaking his or her studies.

⁶ Refer to Pre-Enrolment Policy and Procedure for more details about the pre-enrolment process.

- **Confidentiality:** The agents must act honestly, in good faith, and in the best interest of students and maintain confidentiality and transparency in all their dealings with students.
- **Regulations:** Education agents must adhere to this policy and the legislative requirements of, including but not limited to, Standard 4 of the National Code 2018, Australian International Education and Training Agent Code of Ethics, and the Migration Act 1958.
- **Corrective Actions:** Take corrective actions based on the situation and/or the identified issues and communicate to agents the necessary steps that are required to be taken within the provided timeframe and their relevant details.

The college will be utilising the *Education Agent Monitoring Form* to monitor the education agents who are engaged with the college.

6.2. Risk-Based Oversight

The nature and frequency of monitoring may vary based on the factors, including but not limited to:

- the volume of students referred by an agent;
- student feedback or complaints;
- identified trends in recruitment outcomes; or
- previous compliance or conduct concerns.

6.3. Corrective Action

Where issues are identified, the college may require corrective action in accordance with the terms of the Education Agent Agreement and relevant regulatory expectations. Corrective actions are determined by the college based on the circumstances of each case and may include, but are not limited to:

- providing clarification, guidance, or written instructions to the education agent to address identified issues;
- requiring the education agent to correct or amend inaccurate information or representations provided to prospective students and inform students about the accurate information;
- requiring additional training, briefing, or updated information to be acknowledged by the education agent;
- issuing a formal written warning outlining concerns and required improvements;
- temporarily suspending the education agent's student recruitment services; or
- terminating the Education Agent Agreement in accordance with its terms.

6.4. Provision of Approved Information

The college provides education agents with accurate and approved information and materials to support correct representation of the college, its courses, fees, entry requirements, and student obligations. Where changes occur, the college updates such information where reasonably practicable.

6.5. Review and Appeal by Education Agents

Where an education agent is subject to corrective action under this policy, the agent may request a review of the decision. Any request for review or appeal must:

- be submitted in writing to the college within a reasonable timeframe following notification of the corrective action; and
- clearly outline the grounds for the request, including any supporting information the agent wishes the college to consider.

The college will review the request and determine whether the corrective action should be confirmed, varied, or withdrawn. The outcome of such a review will be communicated to the education agent in writing. The review process does not prevent the college from taking immediate action where required to manage risk or meet regulatory obligations. The complaints and/or appeals of agents will be handled as per the process outlined in the college's *Complaints and Appeals Policy and Procedure*⁷.

7. Continuous Improvement

The college considers information obtained through education agent monitoring activities, agents' or staff feedback, complaints, and/or identified issues to determine improvements to education agent engagement and monitoring practices. The areas where weaknesses, gaps, or recurring concerns are identified, the college will implement appropriate improvements, including, but not limited to, changes to engagement arrangements, monitoring practices, communication processes, internal control through the college's policy, etc. Continuous improvement processes are performed as per the college's established *Continuous Improvement Policy and Procedure*⁸, which governs how improvement actions are recorded, reviewed, and monitored.

⁷ Refer to Complaints and Appeals Policy and Procedure for more details about the college's process of handling complaints and appeals.

⁸ Refer to Continuous Improvement Policy and Procedure for more details about the continuous improvement process of the college.

8. Version Control

Current Version	2.0
Previous Version	1.0