

MONITORING AND MANAGEMENT OF EDUCATION AGENTS PROCEDURE

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1.0 Purpose

The purpose of this procedure is to establish a framework for the ongoing monitoring, review and management of education agents engaged by the Engineering Institute of Technology (EIT). This procedure supports the implementation of the *Education Agents Policy* and ensures EIT monitors education agent performance and conduct, takes appropriate corrective action where required, and maintains compliance with applicable legislative and regulatory requirements.

2.0 Scope

This procedure applies to all EIT staff involved in the monitoring, review, management, renewal, suspension or termination of education agents authorised to represent EIT in relation to CRICOS-registered courses.

3.0 Procedure

3.1 Ongoing Monitoring

EIT will actively monitor the performance and conduct of all authorised education agents to ensure adherence to:

- EIT policies and procedures;
- the Education Agent Agreement;
- the Education Services for Overseas Students (ESOS) framework;
- the National Code of Practice for Providers of Education and Training to Overseas Students 2018;
- the Australian International Education and Training Agent Code of Ethics; and
- other applicable legislative and regulatory requirements.

Monitoring activities may occur throughout the term of the Education Agent Agreement and are not limited to annual review periods.

3.2 Communication and Engagement

EIT recognises that regular communication is essential to maintaining effective relationships with education agents. EIT's Student Recruitment team, or other delegates, will maintain ongoing communication with education agents through activities such as:

- training sessions
- webinars
- agent newsletters
- compliance updates
- meetings and site visits (where appropriate)
- individual support and guidance

Education agents will be provided with information regarding changes to:

- courses and entry requirements
- admissions processes
- visa-related developments
- legislative or regulatory requirements
- EIT policies, procedures and expectations

3.3 Performance Monitoring

EIT will monitor education agent performance using available quantitative and qualitative information. Performance indicators may include:

- number of applications submitted
- quality and completeness of applications;
- The conversion rates of student applications to Confirmation of Enrolments (CoE);
- visa grant and refusal rates
- Student enrolment outcomes
- Responsiveness to EIT communications
- Compliance with contractual obligations
- participation in training and information sessions
- overall contribution to EIT recruitment objectives

3.4 Student Feedback and Complaints

EIT will consider student feedback as part of its ongoing monitoring of education agent performance. Information may be obtained from:

- student surveys
- complaints
- appeals
- admissions feedback

- academic and student support staff feedback
- other relevant sources

Where concerns are identified, EIT may investigate the matter and determine whether corrective action is required.

3.5 Annual Performance Review

Each authorised education agent will undergo a formal performance review:

- at least annually; and
- prior to the renewal of an Education Agent Agreement.

The review will be undertaken by the Student Recruitment Manager, with input from relevant EIT departments, including Admissions and Compliance, where appropriate. The review may evaluate:

- recruitment performance
- application quality
- visa outcomes
- compliance history
- student feedback
- responsiveness and communication
- participation in training activities
- any previous corrective actions

A documented performance review record must be completed and retained on the education agent file.

3.6 Corrective Action

Where EIT becomes aware of conduct or performance that does not meet legislative requirements, contractual obligations or EIT expectations, appropriate corrective action will be taken. Corrective actions may include:

- additional guidance or training
- requests for corrective action by the education agent
- increased monitoring
- issuance of a warning letter
- placement on a probationary period
- suspension of recruitment activities
- termination of the Education Agent Agreement

The corrective action taken will be proportionate to the nature and severity of the issue.

3.7 Warning Letters

A warning letter may be issued where an education agent:

- demonstrates ongoing performance concerns
- repeatedly submits incomplete or unsuitable applications
- fails to comply with EIT requirements
- receives substantiated complaints from students
- fails to respond to reasonable requests from EIT
- engages in conduct which adversely affects its relationship with EIT.

The warning letter will identify:

- the issue or concern
- any required corrective action
- expected timeframes for improvement; and
- potential consequences if improvement is not demonstrated

3.8 Probation Arrangements

An education agent may be placed on probation where:

- a warning letter has been issued, and the concerns have not been adequately addressed;
- EIT requires additional monitoring before deciding whether to continue the relationship; or
- significant performance concerns have been identified that EIT believes may be capable of remediation.

During the probation period, EIT may impose specific requirements or restrictions, including additional monitoring, reporting or training requirements. The duration and conditions of the probation period will be determined by EIT.

3.9 Immediate Corrective Action

Where EIT becomes aware, or has reason to believe, that an education agent, employee or subcontractor has failed to comply with legislative, regulatory or contractual obligations, EIT will take immediate corrective action. Immediate corrective action may include suspension of recruitment activities while EIT investigates the matter.

3.10 Termination of an Education Agent Agreement

EIT may terminate an Education Agent Agreement in accordance with the terms of the agreement. Termination may occur where an education agent:

- engages in dishonest, unethical or fraudulent conduct
- provides false or misleading information to students or EIT
- engages in false or misleading recruitment practices
- provides migration advice without appropriate authorisation
- facilitates the enrolment of non-genuine students

- knowingly assists students to breach visa conditions
- breaches legislative or regulatory requirements
- breaches the Education Agent Agreement
- fails to rectify significant performance concerns
- otherwise acts in a manner that may damage the reputation or integrity of EIT or Australia's international education sector

Where EIT becomes aware, or has reason to believe, that an education agent, or an employee or subcontractor of that education agent, has failed to comply with legislative, regulatory or contractual obligations, EIT will take appropriate corrective action.

Where EIT becomes aware, or has reason to believe, that an education agent, or an employee or subcontractor of that education agent, is engaging in false or misleading recruitment practices, EIT will immediately terminate its relationship with the education agent, or require the education agent to terminate its relationship with the employee or subcontractor responsible for those practices.

Following termination of an education agent agreement, EIT will cease accepting new applications from the education agent unless otherwise approved following a subsequent due diligence assessment.

3.11 Non-Renewal of Agreements

Following a performance review, EIT may determine not to renew an Education Agent Agreement. Where an agreement is not renewed:

- the education agent will be notified in writing
- system access will be removed
- EIT records will be updated
- PRISMS records will be updated where required
- the agent will be removed from EIT's published list of authorised education agents.

3.12 Renewal of Agreements

Where an Education Agent Agreement is renewed, EIT may:

- confirm or update contact information
- review due diligence information
- issue a new agreement
- update internal systems and records
- update PRISMS information where required

Renewal of an agreement is at EIT's discretion and is subject to satisfactory performance and compliance outcomes. The renewal decision and supporting review outcome will be documented and retained on the education agent file.

3.13 Records Management

EIT will maintain records relating to:

- performance reviews
- student feedback
- complaints and investigations
- corrective actions
- warning letters
- probationary arrangements
- suspensions
- agreement renewals
- agreement terminations
- communications with education agents.

Records will be retained in accordance with legislative, regulatory and institutional requirements.

4.0 Definitions

Please refer to the EIT Glossary that can be found [here](#) for all definitions used in this document.

5.0 Related Documents

- Annual Report on the Performance of Education Agents
- Education Agent Agreement
- Education Agent Code of Conduct
- Education Agents Policy.HE
- Marketing and Promotion Policy and Procedure.DS
- Privacy Policy.DS
- Records Management Policy.DS
- Recruitment and Appointment of Education Agents Procedure.HE
- Student Complaints, Grievances and Appeals Policy.HE
- Student Complaints, Grievances and Appeals Procedure.HE

6.0 Related Legislation

The following legislation is relevant to this policy, however not all are mandatory for education providers:

- Australian International Education and Training Agent Code of Ethics
- [*Education Services for Overseas Students Act 2000 \(Cwth.\)*](#)
- [*Higher Education Standards Framework \(Threshold Standards\) 2021 \(Cwth.\)*](#)
- [*Migration Act 1958*](#)
- [*National Code of Practice for Providers of Education and Training to Overseas Students 2018.*](#)
- [*Privacy Act 1988 \(Cwth.\)*](#)
- [*Tertiary Education Quality and Standards Agency Act 2011 \(Cwth.\)*](#)

7.0 Accountabilities

The Governance Board is responsible for review and approval of this policy.

The policy is to be implemented via induction and training of staff and distribution to students and EIT's community via the website and other publications.