

International Education Agent Management Policy

Section 1 - Purpose and Scope

Purpose

(1) This Policy sets out Southern Cross University's requirements for the appointment, management, and termination of its international education agents (Agents).

(2) This Policy supports compliance with:

- a. [Education Services for Overseas Students Act 2000](#) (ESOS) and [Education Services for Overseas Students Regulations 2019](#);
- b. [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) (National Code 2018);
- c. [Higher Education Standards Framework \(Threshold Standards\) 2021](#) (HES);
- d. [Migration Act 1958](#);
- e. [Privacy and Personal Information Protection Act 1998](#) (NSW);
- f. [Privacy Act 1988](#);
- g. [Australian International Education and Training Agent Code of Ethics](#); and
- h. [Modern Slavery Act 2018](#)

Scope

(3) This Policy applies to all University staff, the University's controlled entities, the University's educational partners, contractors, and Agents who recruit international students on the University's behalf.

Section 2 - DEFINITIONS

(4) For the purposes of this policy, the following definitions apply:

- a. Agent – means an International Education Agent, a commercial entity engaged by the University via an Agent Agreement to undertake approved international student recruitment activities on behalf of the University, where they are paid a commission and/or bonuses for a successful commencement and meeting Key Performance Indicators.
- b. Agent Agreement – means an International Education Agent Agreement, the formal written contract between the University and the Agent outlining the terms and conditions under which the services of the agent are provided.
- c. Main Campus – means campuses operated directly by Southern Cross University in Lismore, Coffs Harbour, and the Gold Coast; including Online as a campus location.
- d. Master Agent – An agent that manages other agents on behalf of SCU under a Master Agency Agreement.
- e. PRISMS – means the Provider Registration and International Students Management System (the electronic system that holds CRICOS information and the electronic confirmation of enrolment).

- f. Prospective Student – means any person (whether within or outside Australia) who intends to become, or who has taken steps towards becoming a Student.
- g. SCU Ventures (SCUV) – is a wholly owned entity of Southern Cross University. SCU Ventures operates the University’s metropolitan campuses, including student recruitment and its related functions via the SCU Agent network.
- h. Student – means a person (whether within or outside Australia) enrolled in a course at the University who holds a student visa and are 'overseas students' as defined by the ESOS Act;
- i. The Hotel School (THS) - is wholly owned by SCU Ventures and operates campuses under The Hotel School brand, including student recruitment and its related functions.

Section 3 - POLICY STATEMENT

(5) The University will ensure that

- a. Agents are of high quality and are committed to complying with the standards specified in the [Education Services for Overseas Students Act 2000](#) and [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#). Southern Cross Global, SCU Ventures, and THS conduct regular reviews to monitor Agents' performance and activities;
- b. communication to Agents on matters such as courses, admission requirements, policies, training, complaints, and issues requiring corrective action is timely, accurate and relevant;
- c. relationship building activities with Agents are ethical, and abide by the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#);
- d. students are only accepted from Agents with a current Agent Agreement in place; and
- e. breaches of an Agent Agreement are dealt with in accordance with that agreement and the requirements of the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#).
- f. Where a Master Agency is not a wholly-owned SCU Entity, there are no instances where that Master Agency's representative can also be an SCU employee.

Responsibilities

Southern Cross Global (SCG)

(6) Southern Cross Global (SCG) is responsible for the appointment, management, and termination of Agents for Main Campus. The responsibilities include:

- a. selection, assessment, and appointment of Agents;
- b. provision of training and assistance to Agents;
- c. development and issuing of Agent Agreements;
- d. management and contractual oversight of Agents, including contract signing, extension, renewal and termination;
- e. ensuring compliance of Agent activities with the [Education Services for Overseas Students Act 2000](#) (ESOS), [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#), [Higher Education Standards Framework \(Threshold Standards\) 2021](#), [Migration Act 1958](#), [Privacy Act 1988](#), Australian International Education and Training Agent Code of Ethics; and relevant University policies.
- f. ensuring student applications received via Agents are only accepted from Agents with a current signed Agent Agreement in place;
- g. taking corrective action (which may include termination of an agreement) with any Agents that do not have satisfactory performance or do not comply with the terms and conditions of the Agent Agreement;

- h. conducting annual Agent performance reviews;
- i. managing Agent relationships in a professional and responsible manner; and
- j. managing and mitigating reputational and other risks associated with Agents.

SCU Ventures

(7) SCU Ventures is jointly responsible with SC Global for the management of Agents for the campuses that they operate. SCU Ventures' responsibilities are the same as those set out in clause 7 except as follows:

- a. SC Global is responsible for clause (7)d.

Master Agents

(8) A Master Agent is responsible for the appointment, management, and termination of Agents that they manage on behalf of SCU for the campuses that they operate. The responsibilities are the same as those set out in clause 7.

Agent Responsibilities

(9) Agents are responsible for:

- a. providing prospective students with accurate and comprehensive information about the University and its courses.
- b. submitting prospective student applications to the University with all required information and genuine documentation. Once a student has accepted a letter of offer from the University, Agents who are also registered migration agents are expected to assist students with visa preparation and lodgement, as well as pre-departure and travel formalities.
- c. representing the University within the terms of the Agent Agreement, including approved recruitment territories.
- d. taking reasonable steps to identify, assess and address risks of Modern Slavery practices in the operations and supply chains used in the recruitment of international students, as outlined in the Agent Agreement.
- e. complying with the requirements of the National Code as it applies in relation to education agents.
- f. abiding by the [Australian International Education and Training Agent Code of Ethics](#).
- g. declaring conflicts of interest in a timely manner.

Section 4 - PROCEDURES

(10) Southern Cross University will manage Agents in accordance with the provisions of applicable legislation and the International Education Agent Management Procedure.

Status and Details

Status	Current
Effective Date	9th October 2024
Review Date	9th October 2027
Approval Authority	Vice-Chancellor
Approval Date	9th October 2024
Expiry Date	Not Applicable
Responsible Executive	Anna-Maree Shaw Vice President (Future Students and Outreach)
Head of Work Unit	Damon Ferris Executive Director, Global
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