



**BARTON  
BUSINESS  
SCHOOL**

# **Agent Management Policy and Procedures**

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## 1. PURPOSE

This policy establishes the Barton Business School's ("BBS's") commitment to upholding standards in collaborating with agents for ethical and accurate representation about BBS. BBS maintains rigorous compliance with the [Education Services for Overseas Students \(ESOS\) Framework](#), the [Higher Education Standards Framework \(Threshold Standards\) 2021](#), and the [Migration Act 1958](#).

## 2. SCOPE

This policy and these procedures encompass:

- a. recognised agents designated to represent BBS;
- b. BBS staff members engaged in admissions;
- c. BBS staff members interacting directly with education agents;
- d. education agents seeking to achieve official recognition with BBS;
- e. students who have secured their enrolment via a recognised agent;
- f. agents representing either prospective or current BBS students, both onshore and offshore.

## 3. DEFINITIONS

Refer to BBS's *Glossary of Terms*.

## 4. POLICY

### 4.1. POLICY PRINCIPLES

The primary principles that underpin this policy are:

- a. BBS values the importance of working with agents who uphold transparency and honesty, prioritise the best interests of students, and behave ethically and professionally at all times.
- b. Agents associated with BBS must have a comprehensive understanding of the Australian higher education sector, including all relevant legislation, codes, and standards.
- c. Only agents who have formalised agreements with BBS are allowed to recruit and represent BBS's students.
- d. Prior to entering any partnership, BBS must undertake a thorough assessment of potential agents.
- e. BBS must continually monitor and review partnered agents to ensure they maintain appropriate standards of representation.
- f. BBS reserves the right to terminate or restrict any agent partnership in cases of discrepancies, especially non-adherence to the signed agreements, institutional guidelines, or relevant laws. BBS may also decline student applications forwarded by non-compliant agents.

## 4.2. OBLIGATIONS OF BBS

- a. BBS must consistently ensure adherence to the [Education Services for Overseas Students \(ESOS\) Framework](#), the [Higher Education Standards Framework \(Threshold Standards\) 2021](#), and the [Migration Act 1958](#).
- b. In relation to agents, BBS oversees:
  - i. the process of application and approval for agent collaboration agreements.
  - ii. initiation and continuous training of agents to ensure they have an appropriate understanding and knowledge of:
    - their responsibilities alongside those of BBS;
    - the intricacies of Australia's international education system;
    - the ESOS Framework.
  - iii. supervision and assurance of compliance with the collaboration agreement, including performance indicators, rewards, warnings, suspensions, contract terminations, and validation of the [Genuine Student \(GS\) requirement](#).
- c. BBS holds the right to refuse student applications and take corrective action if there is substantial proof of or if BBS perceives an agent to be:
  - i. offering visa advice without appropriate Australian legal authorisation;
  - ii. previously or currently engaging in dishonest recruitment practices;
  - iii. violating statutes—for instance, the [Modern Slavery Act 2018](#);
  - iv. recruiting students who have not completed the first six months of their principal course, unless permitted by [Standard 7 of the National Code 2018](#);
  - v. recruiting potential students deemed unlikely to comply with their visa conditions;
  - vi. misusing [PRISMS](#) to generate Confirmation of Enrolment (CoEs) without sincere intentions;
  - vii. engaging in or trying to be involved in tax fraud or evasion in connection with a commission or payment received, or to be received, from BBS.

## 4.3. OBLIGATIONS OF AGENTS

- a. agents must always act ethically, legally, and in the best interests of students.
- b. agents must:
  - i. understand and strictly follow this policy;
  - ii. notify BBS promptly of any changes in their agency contact or business details;
  - iii. use only BBS-approved promotional materials in their recruitment processes;
  - iv. ensure transparency and confidentiality when dealing with current or potential students.
- c. for formal collaboration, agents must enter into an official agreement with BBS.
- d. when recruiting students, agents must provide comprehensive information, enabling students to make informed decisions about studying with BBS in Australia.
- e. agents must not:
  - i. provide visa advice unless they are legally authorised to do so under Australian law;

- ii. make false claims about potential migration, career, or assessment outcomes from BBS courses;
- iii. disseminate misleading or incorrect information regarding BBS programs, affiliations, or prerequisites.
- f. agents must refrain from:
  - i. recruiting students who have not completed the first six months of their principal course, unless permitted by [Standard 7 of the National Code 2018](#).
  - ii. enrolling students suspected of not being able to satisfy the [Genuine Student \(GS\) requirement](#).
  - iii. actions that could risk the conditions of a student's visa.
- g. agents must comply with the [Simplified Student Visa Framework \(SSVF\)](#).
- h. agents must use the [PRISMS](#) platform responsibly, ensuring they do not create CoEs with fraudulent intentions.

#### 4.4. DISPLAY OF CRICOS REGISTRATION NAME AND NUMBER

When advertising or promoting courses, agents must prominently display the CRICOS registration name and number of BBS. This requirement is mandatory for materials related to:

- a. offering or provision of a BBS course to international students;
- b. encouraging students to apply or enrol in a BBS course;
- c. highlighting BBS's capability or willingness to provide a course to international students.

#### 4.5. AGENT INFORMATION IN PRISMS

- a. BBS will diligently record and maintain information related to agents within PRISMS, in line with the standards outlined in the [ESOS Framework and Threshold Standards 2021](#).
- b. Agents must inform BBS about any alterations to their contact details, ensuring this update is made within 15 working days.

#### 4.6. BBS WEBSITE

To comply with the ESOS Framework, BBS must regularly update and display a list of its current agents on its official website. This ensures transparency and provides accurate data for reference.

### 5. PROCEDURES

#### 5.1. SELECTION AND APPOINTMENT

- a. BBS determines the necessity for agents based on comprehensive evaluations from both internal and external market data.

- b. The process to evaluate agent applications follows a set of criteria, including a minimum of two reference verifications from CRICOS-registered entities.
- c. For agents lacking prior experience with Australian institutions, references are sought from esteemed international bodies.
- d. Potential conflicts of interest must be disclosed by agents in a written format, pertaining to their association with BBS.
- e. Agents must take preemptive measures to prevent any conflicts throughout their tenure with BBS.
- f. Responsibility for authorising agent applications lies with BBS's Marketing Manager.
- g. BBS's Marketing Manager notifies agents of the outcome of their application in writing within 10 working days of the Marketing Manager's decision.
- h. Representing BBS, the Chief Executive Officer (CEO) signs agent agreements containing all the requirements for agreements outlined in Standard 4 of the National Code of Practice.
- i. Agents must return the signed agreements to BBS within eight weeks.
- j. An agent is officially associated with BBS upon receipt of the signed agreement by BBS.
- k. Details of the agents are recorded both in the PRISMS database and BBS's database.

## 5.2. INDUCTION

- a. BBS's Marketing Manager must provide a comprehensive induction for agents immediately upon their engagement.
- b. BBS's induction for agents must cover the ESOS and National Code stipulations, roles and responsibilities associated with agent management, and monitoring and review processes.
- c. BBS must introduce agents to BBS's admissions policies, procedures, and other mandatory compliance requirements.
- d. Agents must be informed of performance benchmarks, including visa refusal and first-year attrition rates, as part of their induction.
- e. To supplement the initial information provided to an agent, BBS must provide a formal training session for them within three months of the agent agreement being signed.
- f. Every agent training initiative must be evaluated for the dual purpose of quality assurance and continuous improvement.

## 5.3. REVIEW AND MONITORING

- a. BBS's Marketing Manager and CEO must be notified promptly of any potential breaches by agents or their associates, especially if these actions could challenge BBS's compliance with laws such as the ESOS Act or National Code.
- b. Agents must be regularly monitored by BBS's Marketing Manager through:
  - i. Tracking visa refusal rates and first-year attrition rates on a rolling basis.
  - ii. Identifying and addressing trends that indicate potential non-compliance.
  - iii. feedback from students and other parties;

- iv. reviewing agent application quality, conversion rates, and reasons students might withdraw;
  - v. regular checks on agents' online materials, events, and communications;
  - vi. comparing agent recruitment performance against promotional expenses;
  - vii. examining records of student visa approvals, refusals, and cancellations.
- c. If a breach occurs, BBS's CEO must investigate, in collaboration with BBS's Marketing Manager, and take needed actions, which could include suspension of agent activities pending the outcome of the investigation.
- d. Confirmed breaches may result in either termination of the agreement or termination of the relationship with an employee or associate found to have engaged in the breach.

#### 5.4. YEARLY ASSESSMENT

- a. Agents are subject to an annual evaluation in addition to continuous monitoring.
- b. This annual evaluation checks for compliance with the agreement, adherence to relevant legislation, and agreed performance criteria.
- c. The assessment will include performance benchmarks, which may evolve over time to ensure agents maintain high standards. At a minimum, the following measures will be considered:
  - i. Visa Refusal Rate: An agent will be deemed unsatisfactory if the visa refusal rate for their referred students exceeds 40%.
  - ii. First-Year Attrition Rate: An agent will be deemed unsatisfactory if more than 40% of their recruited students discontinue within their first year of study.
  - iii. Other performance benchmarks as determined by BBS in response to regulatory or strategic requirements.
- d. The annual review's outcome, determined by the Marketing Manager, can be:
  - i. Satisfactory – The agent has met or exceeded all benchmarks.
  - ii. Needs Improvement – The agent has fallen below the required standards in one or more areas but is provided with an opportunity to rectify issues.
  - iii. Unsatisfactory – The agent has failed to meet critical benchmarks, requiring immediate remedial action or termination.
- e. Agents receiving an "Unsatisfactory" rating must submit a corrective action plan within 10 working days from receipt of notification, unless an extension is granted by the Marketing Manager.

#### 5.5. AGREEMENT RENEWAL OR TERMINATION

- a. Following a positive annual evaluation, or if the issues raised during the review are resolved satisfactorily, BBS has the discretion to:
  - i. renew the agent's contract;

- ii. extend the agent's contract, but under specified conditions; including performance monitoring and additional compliance requirements where necessary;
  - iii. advise the agent to undertake corrective actions, such as supplementary training, process improvements, or other measures, before considering reappointment.
- b. On successful re-evaluation, the agent's agreement with BBS may be renewed, provided the agent continues to meet performance and compliance expectations.
- c. BBS's Marketing Manager holds the responsibility to either suspend or conclude an agent's agreement. Where suspension is imposed, the agent will be required to rectify identified deficiencies within a specified timeframe. The agent will be informed about such decisions in writing within three weeks.
- d. Apart from situations highlighted in previous sections of these procedures, BBS reserves the right to end an agent's agreement where performance benchmarks are persistently unmet, regulatory obligations are not fulfilled, or non-compliance issues remain unresolved.
- e. The agency agreement can be ended by any involved party for any reason, given a 60-day written notification is provided to the opposite party.
- f. On the termination of the contract:
  - i. Agents must ensure all outstanding student applications are transferred to BBS, and no further applications are submitted on behalf of BBS.
  - ii. Agents must cease all activities representing BBS instantly.
  - iii. All outstanding invoices by the agent must be submitted to BBS within 30 working days of the termination date.

## 6. COMPLAINTS AND APPEALS

Agents have the right to appeal BBS's decision to terminate an agreement, because they believe the review process has not been fairly applied or that they have implemented a solution to any grounds leading to the termination. The CEO makes the final decision within four weeks of the appeal.



## 7. VERSION CONTROL

Document title	Agent Management Policy and Procedures	
Approved By	Board of Directors	
Date of Review	This document is to be reviewed every two years at a minimum from the date of final approval.	
Related Documents	<ul style="list-style-type: none"> <li>• Admission Policy and Procedures</li> <li>• Student Deferment, Suspension, and Cancellation of Enrolment Policy and Procedures</li> <li>• Student Orientation Policy and Procedures</li> <li>• International Student Transfer Between Registered Providers Policy and Procedures</li> <li>• Marketing and Student Recruitment Policy</li> <li>• Privacy Policy</li> <li>• Staff Code of Conduct</li> <li>• Student Fees and Refund Policy and Procedures</li> <li>• Student Letter of Offer and Acceptance Form</li> <li>• Student Agreement Template</li> </ul>	
Related Legislation and References	<ul style="list-style-type: none"> <li>• <a href="#"><i>Higher Education Standards Framework (Threshold Standards) 2021</i></a></li> <li>• <a href="#"><i>Tertiary Education Quality and Standards Agency (TEQSA) Act 2011</i></a></li> <li>• <a href="#"><i>Direction Number 106 - Assessing the Genuine Entry and Stay Requirements for Student Visa and Student Guardian Visa Applications</i></a></li> </ul>	
Version	Notes	Date Approved
1.0	<ul style="list-style-type: none"> <li>• The first draft was presented and approved with minor editorial changes.</li> </ul>	09/10/2023
1.1	<ul style="list-style-type: none"> <li>• Changes in 4.2 and 4.3 to add GTE hyperlink</li> </ul>	13/11/2023
1.2	<ul style="list-style-type: none"> <li>• Replacement of GTE to GS requirements in line with the Ministerial Direction Number 106</li> </ul>	08/04/2024
2.0	<ul style="list-style-type: none"> <li>• The BoD approved this document with updates in sections 5.2, 5.3, 5.4 and 5.5.</li> </ul>	17/02/2025