



Agent Policy

1. Purpose

To ensure ALACC's Agents act ethically, honestly, transparently, and in the best interests of students while supporting compliance with ALACC's obligations under the ESOS Act, the National Code, and the 2025 Standards for RTOs. This policy supports the maintenance of high-quality student recruitment practices and upholds the reputation of ALACC and Australia's international education sector.

2. SCOPE

This policy applies to all Agents (education or migration) engaged by ALACC to recruit students into ALACC courses, including both international and domestic students.

3. DEFINITIONS

Term	Definition
Agent	Includes education agents, migration agents, and their employees/subcontractors who represent ALACC in recruiting students.
Code of Ethics	The Australian International Education and Training Agent Code of Ethics based on the London Statement.
ESOS Act	Education Services for Overseas Students Act 2000.
National Code	Refers to the most current version (including any 2025 updates) of the National Code of Practice for Providers of Education and Training to Overseas Students.
PRISMS	Provider Registration and International Student Management System.
ASQA 2025 Standards	The revised Standards for RTOs (2025) published by the Australian Skills Quality Authority.



4. POLICY STATEMENT

ALACC is committed to engaging only reputable, ethical, and knowledgeable Agents to ensure that prospective students receive accurate and transparent information about study options and to ensure full compliance with the ESOS Act, the National Code, and ASQA 2025 Standards.

5. PROCEDURES

5.1 Agent Engagement

ALACC will only engage Agents:

- With whom a **formal written agreement** has been signed.
- Whose details are entered and maintained in **PRISMS** once they recruit a student.
- Who are assessed to:
 - Have sound knowledge of Australian international education systems.
 - Understand and adhere to the **Code of Ethics**.
 - Act in good faith and uphold ALACC's standards.

5.2 Written Agreement Requirements

All agreements with Agents must outline:

- ALACC's obligations under the **ESOS Act, National Code, and ASQA 2025 Standards**.
- The Agent's responsibilities, including:
 - Ethical conduct
 - Provision of accurate information
 - Avoiding conflicts of interest
- Monitoring processes including performance evaluation.
- Conditions for suspension or termination.
- ALACC's and regulators' rights to share information regarding agent performance or misconduct.



5.3 Monitoring and Review

- ALACC will monitor each Agent's performance annually through:
 - Student feedback (via evaluations)
 - Conversion and visa grant rates
 - Complaints or breach reports
- ALACC may conduct spot checks or request updated training evidence from Agents.
- Underperformance or breach may result in additional training, formal warning, or termination.

5.4 Corrective Action

- If an Agent is found to be:
 - Misleading students
 - Violating the ESOS Act or National Code
 - Providing unregistered **migration advice**
ALACC will take immediate action, which may include:
 - Providing additional training
 - Formal warning
 - Termination and reporting to regulators

5.5 Ethical Requirements for Agents

Agents must:

- Provide students with current, accurate, and unbiased information.
- Declare and manage any **conflicts of interest**, such as:
 - Receiving commissions from multiple parties for the same service.
 - Having a financial interest in ALACC.
- Not make false claims or misrepresent ALACC or Australian visa conditions.
- Refrain from recruiting students known to be currently enrolled with another provider without following transfer rules (Standard 7).



- Comply with **Standard 1 (Student Protection)** and **Standard 2 (Quality Assurance)** of the ASQA 2025 Standards.

5.6 Data and Record Maintenance

ALACC will:

- Maintain accurate records of all Agent Agreements.
- Update PRISMS with agent activities.
- Keep records of complaints, appeals, and resolution outcomes.
- Review and log all terminated Agent relationships.

6. LEGISLATION AND GUIDELINES

- **ESOS Act 2000**
- **National Code of Practice** (latest version)
- **ASQA Standards for RTOs 2025**
- **Migration Act 1958** (if applicable)
- **Australian International Education and Training Agent Code of Ethics**

7. RELATED DOCUMENTS

- Agent Agreement Template
- Agent Application Form
- Student Enrolment Form
- Student Evaluation of Agent
- Records of Complaints & Appeals
- Marketing and Information Provision Policy
- Complaints and Appeals Policy
- Continuous Improvement Register



8. NON-COMPLIANCE

Any suspected breach of this policy must be reported immediately to the CEO or Director of Studies. Non-compliance will trigger a formal investigation and may lead to suspension or termination of the Agent Agreement, and notification to regulatory bodies where required.

9. Document Control

Policy:	Agent Policy
Policy owner:	CEO / Director of Studies
Reviewed by:	Compliance Team
Approval authority:	Dr Janet Lawrence, D.Ed., FACN CEO/Director of Studies
Last Review date:	April 2025
Version:	2025.1
Next review:	April 2027
Summary of changes:	The updated Agent Policy has been revised to align with the ASQA Standards for RTOs 2025, reinforcing ethical and compliant agent practices. Key changes include the addition of explicit references to ASQA 2025 Standards, strengthened requirements for monitoring agent performance, clearer definitions of conflicts of interest, and enhanced procedures for corrective actions and termination. The policy now also clarifies obligations around data management, the provision of accurate and transparent information, and prohibits unauthorised migration advice. The review and documentation section was also updated to reflect current timelines.