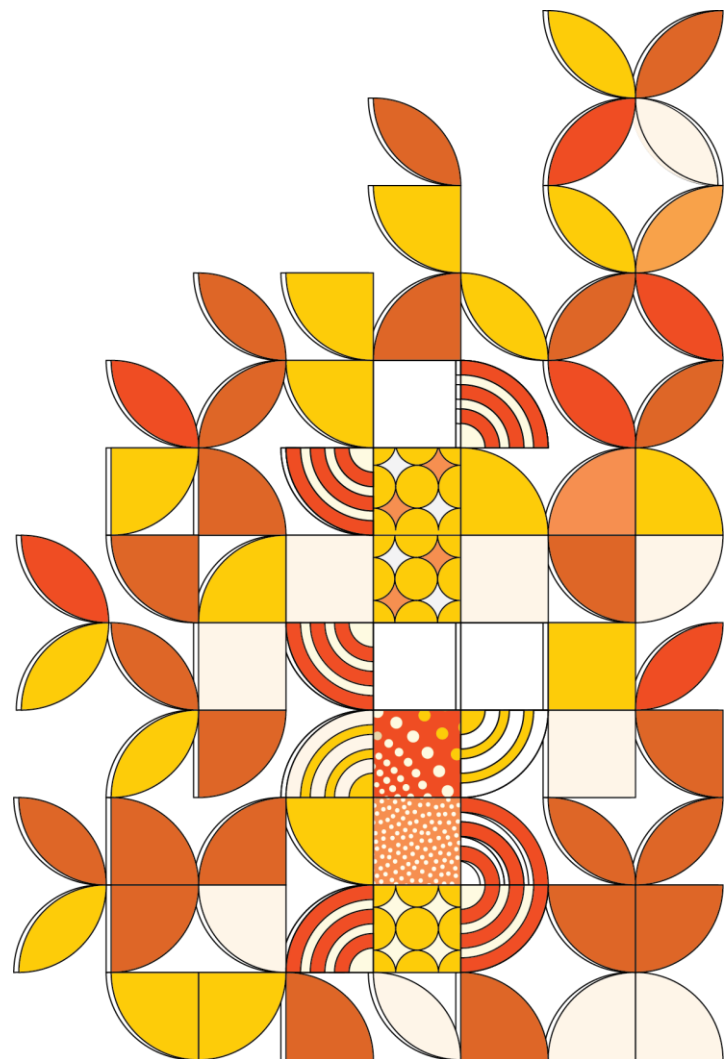


Agent Appointment, Monitoring and Management Procedure



SECTION 1

Purpose

1. This document sets out the Institute of Health and Management's (IHM) policy in relation to the recruitment, management and termination of International Student Recruitment Agents (Agents).

Scope

2. This document applies to all recruitment agents that IHM engage with for student recruitment and promotion of its courses.

Definitions

3. The following terms are used throughout this document:
 - a) **Agent:** A person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers.
 - b) **Authorised Person:** a person or organisation designated to sign and make decisions on behalf of IHM.
 - c) **Course Fee:** the tuition and other fees set by IHM for the courses.
 - d) **Courses:** the full-time registered Courses offered by IHM and registered on CRICOS.
 - e) **PRISMS:** the Provider Registration and International Students Management System (the electronic system that holds CRICOS and the electronic confirmation of enrolment).
 - f) **Prospective student:** a person (whether within or outside Australia) who intends to become, or who has taken any steps towards becoming a Student at IHM.
 - a) **Relationship Officer:** an individual who is responsible for building and maintaining positive relationships with agents or representatives working on behalf of IHM.

Suite documents

4. This procedure is linked to the following documents:
 - a) Agent Appointment, Monitoring and Management Policy
 - b) See Associated Information listed in the 'Related Internal Documents' in Section 3 below.

SECTION 2

Procedure

Agent Recruitment

5. Application

Potential Agents must complete an International Student Recruitment Agents Registration form and submit it together with a business profile to IHM for review and consideration. Agents can submit the through different methods:

- a. Online registration is through the IHM website via downloading the Registration form and emailing the completed form to enquiry@ihm.edu.au
- b. Contacting any IHM Staff, who will redirect enquiry to relationship officer respectively for each geographical area.

6. Agent Profile in Stakeholder Portal

- a) An IHM Relationship Officer reviews the Agent's registration form and creates an International Recruitment Agent profile in the Stakeholder Portal on the IHM Knowledge Hub (KH). All details from agent must be entered including:

Stakeholder Name

Legal Entity Name

Is this an Australian Business?

ABN /ACN

Address

Country

Phone Number

Website

Campuses

Stakeholder Type

Company Type

Stakeholder Association

Relationship Officer

Referees

b) A minimum of one contact person from the Agent must be added including details under the agent profile.

c) The Agent's recruitment form must be uploaded under documents under the agent profile.

7. Review of Application

a) A notification will be sent to an Authorised Person attached with the Agent's registration form for further review. All sections in the registration form must be reviewed to determine if the agent will be considered for potential agreement or not. The Authorised Person will notify the Relationship Officer of the outcome by email:

a. If the Agent's application is approved, the Relationship Officer must proceed with creation of an agent profile in the Stakeholder Portal.

b. If the Agent's application is not approved, the Relationship Officer must notify agent about the outcome and not proceed further with application.

8. Reference Check

The Relationship Officer must contact the 3 referees supplied in the Agent's application and record the conversation/meeting/email on the Agent Reference Check Form. This will be added in the documents section under agent profile in the stakeholder portal. A minimum of one Reference check (positive feedback) is required to consider agent agreement.

9. Agreement

a) Once the Relationship Officer has completed and uploaded the Agent Reference Check Forms, an agreement must be issued and sent to the Agent for completion, signature and return.

b) Once the agreement has been returned, an Authorised Person will review and confirm all mandatory documents required and fields are completed and uploaded under agent profile in stakeholder portal to proceed with signature of the same.

10. Signature of Agreement

- a) Once reviewed, agreement signatures from the CEO or a delegate is required. A scanned copy of the form will be returned to Relationship Officer.
- b) The Relationship Officer must send the copy of the signed agreement along with the Agents Manual to the Agent for their reference. A copy of the agreement will be stored under the agent profile in the Stakeholder Portal.

11. Change status in Stakeholder Portal

- a) When all above forms have been completed (including the agreement) and uploaded under the Agent's profile in the stakeholder portal, the status of the Agent must be changed to "Agreement Signed" which means agent is active.
- b) A notification must be sent to the Compliance Team to report the new Agent to TEQSA. Refer to point 14.

12. Training & Induction

- a) IHM (Authorised Person, Relationship Officer or delegate) will conduct an induction (face-to-face or online) for the new Agent, which will include but not limited to:
 - a. Introduction to HCI and IHM
 - b. course information
 - c. entry requirements, including required level of English proficiency.
 - d. application and enrolment procedures
 - e. payment procedures, including medical insurance (if applicable)
 - f. course progress/attendance requirements
 - g. key dates and details
 - h. orientation day
 - i. arrangements for reporting on compliance with visa requirements
 - j. student support services
 - k. other services for students, such as accommodation
 - l. costs of living in Australia
 - m. Policies and Procedures
 - n. Compliance requirements
 - o. Monitoring

- p. Stakeholder portal induction
- b) The above information is also included in the Agents' Manual which is provided to the Agent earlier with the Agreement.

13. Stakeholder Portal Access for Agents

- a) The Relationship Officer will make the International Recruitment Agent a "user" though the Stakeholder portal, so the Agent can start submitting enquiries through the portal.
- b) The Agent's details are created and maintained in the Stakeholder portal.

14. TEQSA Notification

- a) Agents must be notified to TEQSA annually by Compliance.
- b) Agents must be added to PRISMS with the contact details.

Updating Information

- 15. IHM will ensure that the Agent is provided with current information regarding the provider and the courses offered.
- 16. New/updated course documents and detailed information will be provided to agents once approved.
- 17. Agents are required to notify IHM if any details related to the Agent, or its operations are altered.
- 18. IHM will ensure the Agent is provided with the latest marketing materials, posters and promotion material (electronic or hard copy). All Agents must ensure they use the current marketing materials supplied and destroy previous versions.

Monitoring Progress

- 19. By signing the Agent Agreement, the Agent agrees to 6 month and annual reviews with IHM in relation to its performance, quality and any other issues that may arise.
- 20. IHM monitors and reviews the performance of its approved agents through a number of methods:
 - a) Ongoing and consistent contact with Agents via telephone, email, skype meetings, expos, or any marketing activities.

- b) Auditing of Agent websites for accuracy and currency of information relating to IHM.
 - c) Monitoring of the number of enquiries received, enrolments and visa refusals.
 - d) New Student Agent Feedback Form
 - e) Complaints received by students or IHM staff.
 - f) 6 months and annual reviews on Agent performance.
21. The monitoring procedure is designed to ensure that IHM is using reputable Agents. The outcome of any monitoring will form part of the input to the annual review and further renewal or termination of the agreement.
22. New Student Agent Feedback Form: Upon arrival at the Institute, new students who have come through an IHM approved Agent are asked to complete the New Student Agent Feedback Form, included in student orientation packs. This form provides direct feedback concerning students' opinions and experiences with their agents. Feedback Forms will be kept under each agent under their profiles in the Stakeholder portal.

Monthly / Annual Review

23. IHM will contact the Agent to arrange a 6 monthly or annual review meeting from the date of signing of the agreement. This review may be either in-person or online.
24. IHM Relationship Officers will conduct the 6 monthly or annual review based on agent performance with regard to quality of enquiries, enrolments, visa outcomes, Industry and regulatory knowledge, ethical practices, student feedback and complaints. The review will also consider the agents' marketing strategies and plans to best represent IHM and promote IHM courses to prospective students.
25. A report of these reviews is submitted to the Authorised Person.
26. The outcome of this review may be renewal or termination of the agent. Agent will have the right to appeal against this outcome.
27. Agent Feedback on IHM service: The agent will be asked to provide feedback on the services that IHM provides. Any comments and or issues raised should be collated and filled in the Agent profile in stakeholder portal. In addition, any comments requiring action should be put into the Action Plan Register.

Ethical Standards

28. IHM expects its agents to **not**:

- a) engage in unethical behavior, nor have ever engaged, in any dishonest practices, including suggesting to prospective students that they may use a student visa to come to Australia for a primary purpose other than full-time study.
- b) facilitate applications and/or enrolment of prospective students who the Agent believes will not comply with the conditions of their student visas.
- c) facilitate or encourage applications from any student that the Agent has referred to the Institute to attend another educational institution whilst that student is enrolled in an IHM course.
- d) make any representations or offer any guarantees to prospective students about:
 - a. whether they will be granted a student visa
 - b. any employment outcomes or prospects associated with a course.
 - c. residency requirements or immigration status in Australia, including any possible migration outcomes.
- e) provide immigration advice unless authorized to do so under the Migration Act 1958.
- f) commit, or purport to commit IHM to offer any prospective student enrolment in a course.
- g) Create Confirmations of Enrolment.
- h) use any registered or unregistered mark of IHM without the prior written consent of the institute.
- i) undertake any advertising or promotional activity about courses or IHM or any of its associates, sponsors, business partners or any other organization without the prior written consent of the Institute; or
- j) receive or bank any fees or charges payable to the Institute by a prospective student or deduct any amount from such fees or charges.

29. Failure to abide by these above obligations will result in a review process which may result in warning or termination of the Agent agreement.

6 months / Annual Review

30. Twice a year, Relationship Officers will run a review process that will typically cover Agents whose anniversary of renewal takes place within the previous 6 months.
31. The Relationship Officer will arrange for a review meeting with the Agent. This review will not wait for the anniversary if the agent is suspected of unethical conduct but will be called as soon as possible. An Authorized person will conduct the review meeting for this instance.
32. If IHM deems it necessary, IHM may suspend the Agent until the review is complete. In this instance the Agent will have the right to appeal against this outcome. The review must be convened with 10 working days of the notice of Intention to Terminate the Agent Agreement letter is received.
33. Ideally this will be in-person either at the Agent's offices or at IHM offices. For Agents overseas who are not being visited by an IHM representative, a conference call meeting will be required
34. When IHM representatives are travelling in the region of the Agent within 3 months of the anniversary then the review can be held at that time relaxing the one-month rule.
35. The meeting should be recorded on the IHM Recruitment Agent Review Form and filed on the Agent's profile in the Stakeholder portal.
36. This meeting will cover the below points:
 - a) Review of business generated by the Agent agreement including numbers of students referred, enrolled, and continuing at IHM supplied by the agent.
 - b) Complaints, issues, unethical behaviour raised for the Agent.
 - c) Review of markets, trends and other factors affecting the recruitment of students.
 - d) Feedback based on New Student Agent Feedback Form and information provided by students or IHM staff that have had cause to interact with the agent.
 - e) Any other relevant topics to be discussed.
37. Review will take the above factors into consideration, agents who fail to meet standard requirements will not have their agreement renewed.

Actions following a Review

38. Following the review meeting the Authorized Person or delegate will make a recommendation on the continuing relationship between IHM and the Agent. The Authorized Person or delegate will classify the Agent as one of the following:

a) Recommended for renewal:

a. If the Agent is recommended for renewal, then a new Agency agreement will be issued for counter signature by both parties for another 1 year.

b. If Agent is recommended for renewal, but with specific requirements in relationship to behavior, working practices, etc, these will be recorded in the IHM Recruitment Agent Review Form under the agent's profile in stakeholder portal for future references.

b) Recommended for termination as an IHM agent:

a. If the Agent is recommended for Agreement Termination, a Terminate Agent Agreement letter will be issued with details of the reasons for the decision and sent to the agent. On termination of the Agreement, the Agent must:

- submit all applications and fees from prospective students received up to the termination date; and
- immediately cease using any advertising, promotional or other material supplied by IHM and return all material to IHM by registered mail or a reputable international courier.

b. Either party may terminate the Agreement at any time by giving the other party 30 days prior written notice.

c. If IHM becomes aware of the Agent breaching any provision of their Agreement or being identified as being negligent, careless or incompetent or being engaged in false, misleading or unethical advertising and recruitment practices, including practices that could harm the integrity of Australian education and training, IHM will immediately write to the Agent suspending their Agreement pending a review.

d. Where the Agent has been suspended, no applications will be accepted from the Agent and all payments will be suspended until the review process is complete.

Right to Appeal

39. IHM supports an Agent’s right to appeal a non-renewal decision.
40. Agents have the right to appeal non-renewal of Agent Agreements within ten (10) business days of the Notice of Termination of Agreement letter received. Agents must address their appeal in writing with any supporting documentation to the Authorised Person who will arrange a review meeting for the appeal and conclude if the Agent is eligible for probationary extension of agency agreement valid for 1 year.

Responsibilities

41. The Chief Operations Officer has the overall responsibility of this procedure. Other responsibilities are outlined within the procedure.

SECTION 3

Associated Information

| | |
|---|---|
| Related Internal Documents | Marketing of Courses to Offshore and Overseas Students Policy Agent Reference Check form Agents Manual New Student Agent Feedback Form Action Plan Register Intention to Terminate an Agent Agreement letter International Student Recruitment Agents Registration form IHM Recruitment Agent Review Form Notice of Termination of Agreement |
| Related Legislation, Standards and Codes | Education Services for Overseas Students Act 2000 Freedom of Information Act 1982 Information Privacy Act 2000 (VIC) Migration Act 1958 National Code of Practice for Providers of Education and Training to Overseas Students 2018 Privacy Act 1988 Privacy and Personal Information Protection Act 1998 (NSW) |
| Date Approved | 16.08.2023 |
| Date Endorsed | 18.08.2023 |
| Date of Effect | 18.08.2023 |
| Date of Next Review | 31.07.2026 |

| | |
|--|---|
| Approval Authority | Executive Management Committee endorsed by Board of Directors |
| Responsibility for implementation | Chief Operating Officer |
| Document Custodian | Chief Operating Officer |
| Responsible Department | Marketing Department |
| PinPoint Doc ID | IHM-AAMMP-3.0 |

Change history

| | | Version Control | | Version 3.0 |
|-----------------------|------------|------------------------|---|-------------|
| Change Summary | Date | Version | Short description of change, incl version number, changes, who considered, approved etc | |
| | 05/06/2018 | Version 1.0 | Original document (combined with Policy) | |
| | 28/07/2023 | Version 2 | Transfer into updated template | |
| | 14/08/2023 | Version 3 | Transfer into current template and separation of Policy and Procedure into separate documents | |