

Engaging Education Agents Policy & Procedure

1.0 Policy

1.1 Purpose

This Policy and Procedure outline the framework used by Princeton International College to engage, manage, monitor and, where necessary, terminate education agents in a manner that ensures compliance with:

- Education Services for Overseas Students Act 2000 (ESOS Act)
- Education Services for Overseas Students Regulations 2019
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018), Standard 4 – Education Agents
- Standards for Registered Training Organisations (RTOs) 2025

This policy ensures that education agents act ethically, honestly, transparently and in the best interests of overseas students and uphold the reputation and integrity of Australia's international education sector.

Responsibility for Implementation and Oversight

The Chief Executive Officer (CEO), in conjunction with the Marketing Officer, is responsible for the implementation, oversight and ongoing effectiveness of this Policy and Procedure.

This responsibility includes, but is not limited to:

- ensuring compliance with the ESOS Act, National Code 2018 and the Standards for RTOs 2025;
- approving, renewing and terminating Education Agent Agreements;
- overseeing education agent recruitment, monitoring and performance management processes;
- ensuring accurate reporting and record keeping, including PRISMS requirements; and
- reviewing this Policy and Procedure periodically to ensure continued alignment with legislative and regulatory requirements.
- The CEO ensures that education agent fit and proper assessments and conflict of interest declarations are obtained and reviewed prior to engagement and periodically thereafter.

The CEO and Marketing Officer ensure that appropriate systems, controls and resources are in place to support ethical engagement of education agents and the protection of overseas students and the integrity of Australia's international education sector.

1.2 Definition:

Education Agent: means an entity (whether in or outside Australia) that:

Engaging Education Agents Policy & Procedure

- a) engages in any of the following activities in relation to a provider:
- i. the recruitment of overseas students, or intending overseas students;
 - ii. providing information, advice or assistance to overseas students, or intending overseas students, in relation to enrolment;
 - iii. otherwise dealing with overseas students, or intending overseas students; and
- b) is not a permanent full-time or part-time officer or employee of the provider.

Casual employees or contractors are included in the definition of education agent where they undertake any of the activities listed above.

Education agent Commission: means any consideration or benefit, whether monetary or non-monetary, that:

- is or will be given by or on behalf of a provider to an education agent, or an associate of the education agent, and
- is in connection with:
 - o the recruitment of overseas students, or intending overseas students, or
 - o providing information, advice or assistance to overseas students, or intending overseas students, in relation to enrolment; or
 - o otherwise dealing with overseas students, or intending overseas students.

Princeton International College will identify and record all individuals or entities that fall within the definition of an education agent, regardless of whether a formal written agreement exists. Such education agents will be recorded in the Education Agent Register and, where applicable, reported in PRISMS in accordance with ESOS legislative requirements.

1.3 Ethical Engagement of Education Agents

Princeton International College will take all reasonable measures to ensure that education agents engaged to formally represent the College:

- have appropriate knowledge and understanding of the Australian international education system;
- comply with the Australian International Education and Training Agent Code of Ethics
- act ethically, honestly and in good faith;
- provide accurate, current and truthful information to prospective students; and
- act in the best interests of overseas students at all times.

Princeton International College will not engage, or will cease engagement with, any education agent who is dishonest, lacks integrity, or engages in unethical recruitment practices. Princeton

Engaging Education Agents Policy & Procedure

International College ensures that education agent recruitment practices prioritise the genuine educational interests, wellbeing and informed decision-making of overseas students.

Education Agent Fit and Proper Requirements

Princeton International College undertakes enhanced due diligence to ensure that education agents engaged by the College are fit and proper to represent the organisation. This includes identifying any ownership, financial interest, control, or influence relationships between education agents and education providers. Education agents are required to disclose any actual, potential, or perceived conflicts of interest to ensure recruitment practices remain transparent, ethical, and in the best interests of students.

1.4 Written Agreements

Princeton International College maintains a formal written agreement with each education agent that formally represents the College for the purpose of promoting courses and recruiting students. These agreements establish clear expectations, accountability and compliance obligations to ensure that education agents act ethically, honestly and in the best interests of overseas students.

Each Education Agent Agreement includes, but is not limited to, provisions addressing:

- the respective roles and responsibilities of Princeton International College and the education agent, including limits on the agent's authority to act on behalf of the College;
- a requirement for the education agent to comply with the Education Services for Overseas Students Act 2000 (ESOS Act), the National Code of Practice for Providers of Education and

Engaging Education Agents Policy & Procedure

Training to Overseas Students 2018, and the Standards for Registered Training Organisations (RTOs) 2025;

- monitoring, reporting and performance review arrangements used by the College to assess agent conduct, student quality and ongoing compliance;
- corrective action and performance management requirements where issues, risks or non-compliances are identified;
- termination conditions, notice periods and circumstances under which immediate termination may apply; and
- information-sharing arrangements with Commonwealth, State and Territory authorities where required for regulatory, compliance or integrity purposes.
- requirement for the education agent to complete a fit and proper, conflict of interest and integrity declaration as part of the agreement.

Education Agent Agreements are reviewed periodically and updated as necessary to reflect legislative changes, regulatory guidance and internal risk management requirements.

1.5 Agents Acting on Behalf of Students

Princeton International College is not required to have a written agreement with agents who act solely on behalf of students, do not formally represent the College, and are not authorised to promote, market or recruit students on behalf of Princeton International College.

Such agents do not act as representatives of the College and have no authority to:

- promote Princeton International College courses,
- provide official information on behalf of the College, or
- recruit students for enrolment.

Where an agent undertakes any activity that constitutes formal representation of Princeton International College, a written Education Agent Agreement is required in accordance with the National Code 2018.

1.6 Monitoring and Integrity

Princeton International College actively monitors education agent activities to ensure that agents maintain the integrity and reputation of Australian education and training. Monitoring processes are detailed in Section 6 of this policy.

Engaging Education Agents Policy & Procedure

1.7 Prohibited Agent Conduct

Princeton International College will not enter into an agreement with, or will terminate an existing agreement with, an education agent where the College knows, or reasonably suspects, that the education agent, or its employees or subcontractors, has engaged in any of the following conduct:

- Dishonest or unethical recruitment practices, including recruiting or attempting to recruit students in a manner that conflicts with Princeton International College's obligations under the National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- Facilitating the enrolment of students where the education agent knows or reasonably believes that the student will not comply with the conditions of their student visa.
- Facilitating, inducing or attempting to influence the creation or issuance of Confirmations of Enrolment (CoEs) for non-bona fide students, including by providing false, misleading or incomplete information. *Princeton International College does not provide education agents with access to PRISMS under any circumstances.*
- Engaging in false, misleading or deceptive advertising or recruitment practices, including providing inaccurate information about courses, visa outcomes, fees, duration or migration prospects.
- Providing immigration or migration advice without being authorised to do so under the *Migration Act 1958*, including representing to students that visa outcomes are guaranteed.

Where any of the above conduct is identified or reasonably suspected, Princeton International College will take immediate corrective action, which may include suspension or termination of the Education Agent Agreement in accordance with this policy.

1.8 Termination Due to Agent Misconduct

Where Princeton International College becomes aware or reasonably suspects that an education agent is engaged in dishonest or unethical conduct, the College will terminate the agreement with the agent.

Where the misconduct is attributable to an individual employee or subcontractor of the agent, and the agent has terminated that relationship, Princeton International College may continue the agreement at its discretion.

Engaging Education Agents Policy & Procedure

1.9 Preventive and Corrective Action

Princeton International College takes immediate preventive and corrective action where an education agent is found to be negligent, careless, incompetent or engaged in false, misleading or unethical advertising or recruitment practices.

1.10 Responsibility for Implementation

CEO along with Marketing Officer is responsible for implementing this policy, monitoring compliance and reviewing the effectiveness of this policy in accordance with regulatory requirements.

2.0 Procedure

2.1 Education Agent Application Process

Any individual, business or organisation seeking to enter into an agreement to promote Princeton International College and recruit students on its behalf must submit a completed Education Agent Application Form prior to any consideration of engagement.

The Education Agent Application Form:

- is available upon request from the College reception; and/or
- can be downloaded from the Princeton International College website.

The application form requires prospective education agents to provide detailed information, including but not limited to:

- legal entity name, trading name and business registration details;
- contact information and operational addresses;
- countries or regions of operation;
- details of key personnel involved in student recruitment;
- details of any Migration Agents Registration Number (where applicable);
- recruitment history and experience in the Australian international education sector;
- referees and supporting documentation as requested.

Submission of an Education Agent Application Form:

- does not authorise the applicant to represent Princeton International College;
- does not permit the applicant to promote courses or recruit students on behalf of the College; and
- does not guarantee approval or execution of an Education Agent Agreement.

All applications are assessed in accordance with the College's due diligence and risk management processes. Only applicants who successfully complete the assessment process and enter into a

Engaging Education Agents Policy & Procedure

signed Education Agent Agreement are authorised to act on behalf of Princeton International College.

Any promotional or recruitment activity undertaken without written authorisation constitutes a breach of this policy and may result in rejection of the application.

2.1.1 Assessment of Applications

The Marketing Officer / Marketing Staff is responsible for assessing all Education Agent Application Forms to determine the suitability of the applicant to represent Princeton International College.

The assessment process includes, but is not limited to, the following:

- **Verification of Accuracy, Completeness and Adequacy of Information**
The application is reviewed to ensure that all required information has been fully completed, is accurate, current and supported by relevant documentation. This includes verification of the agent's legal entity details, business registration, contact information, operational locations and declared recruitment markets.
- **Referee and Background Checks**
Referee checks are conducted via telephone or email with nominated referees to confirm the applicant's recruitment history, professionalism, ethical conduct and reliability. Where appropriate, informal background checks may also be undertaken with industry contacts to assess the agent's standing within the international education sector.
- **Industry Feedback and Market Reputation**
Where considered necessary, feedback may be sought from other registered education providers, students or industry stakeholders regarding the applicant's past recruitment practices, student quality and compliance history. This information is used to identify any potential risks, patterns of non-compliance or concerns relating to the agent's conduct.
- **Review of Business Reputation and Recruitment History**
The applicant's business reputation and recruitment history are reviewed, including consideration of:
 - volume and quality of students previously recruited;
 - visa outcomes, refusals or cancellations where known;
 - compliance with the National Code 2018 and visa integrity requirements; and
 - any known history of misleading, unethical or non-compliant recruitment practices.
- **Risk Assessment and Decision Making**
Based on the information gathered, the Marketing Officer / Marketing Staff assesses the overall risk associated with engaging the applicant as an education agent. Recommendations are documented and submitted for approval in accordance with internal delegation requirements.

Engaging Education Agents Policy & Procedure

All assessment records, referee checks, communications and decisions are documented and retained on the Education Agent file as evidence of due diligence and compliance with the National Code 2018 and the Standards for RTOs 2025.

2.1.2 Notification of Outcome

Princeton International College ensures that all applicants who submit an Education Agent Application Form are formally notified of the outcome of their application in a timely and transparent manner.

- **Timeframe for Notification**

All applicants will be notified in writing within fourteen (14) calendar days of the College's receipt of a completed Education Agent Application Form. Written notification may be provided via email or formal correspondence.

- **Unsuccessful Applications**

Where an application is unsuccessful, the written notification will clearly state the outcome and outline the reasons for the decision. Reasons may include, but are not limited to, concerns identified during due diligence checks, referee feedback, recruitment history, compliance risks, or failure to meet the College's suitability requirements.

An unsuccessful application does not prevent the applicant from submitting a future application, subject to any conditions or timeframes determined by Princeton International College.

- **Approved Applications**

Where an application is approved, the applicant will be issued with a formal Education Agent Agreement for review and execution. Approval is conditional upon the applicant signing and returning the Education Agent Agreement and complying with all terms and conditions outlined within the agreement.

The applicant is not authorised to promote courses or recruit students on behalf of Princeton International College until the Education Agent Agreement has been fully executed by both parties.

All notifications, correspondence and executed agreements are retained on the Education Agent file as evidence of compliance with the National Code 2018 and the Standards for RTOs 2025.

2.1.3 Education Agent Fit and Proper, Conflict of Interest & Integrity Declaration

As part of the education agent approval process, all prospective education agents must complete and sign the Education Agent Fit and Proper, Conflict of Interest & Integrity Declaration incorporated within the Education Agent Agreement prior to undertaking any recruitment activities

Engaging Education Agents Policy & Procedure

This declaration requires education agents to disclose:

- ownership, financial interest, or controlling influence in another education provider;
- family, business, or commercial relationships with education providers or migration agents;
- any arrangement that may create an actual, potential, or perceived conflict of interest;
- any other information relevant to determining whether the education agent is fit and proper to represent Princeton International College.

Princeton International College reviews the declaration as part of its due diligence and risk assessment process. Failure to disclose relevant information may result in rejection of the application, suspension, or termination of the Education Agent Agreement.

The declaration forms part of the Education Agent Agreement and is binding on the education agent.

2.2 Education Agent Agreements

2.2.1 Execution of Agreement

- All approved education agents must sign and return the Education Agent Agreement prior to undertaking any promotional activities.
- The CEO signs all agreements on behalf of Princeton International College.
- Agreements may be executed via email, post or in person.

2.2.2 Agreement Validity and Review

- Agreements are valid for the period stated in the agreement.
- Agreements are reviewed prior to expiry for renewal.
- Legislative changes impacting agent arrangements are communicated in writing, and agent acknowledgement is required.

2.2.3 Commission Payments

Princeton International College will only pay education agent commissions strictly in accordance with:

- the terms and conditions outlined in the signed Education Agent Agreement; and
- the requirements of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, including Standard 4 – Education Agents.

Commission payments are subject to verification that the recruitment activity is compliant with the ESOS framework and does not constitute a prohibited student transfer.

Princeton International College ensures that commission arrangements do not create conflicts of interest or encourage unnecessary student transfers between providers.

Engaging Education Agents Policy & Procedure

Prohibition on Commission Payments

Princeton International College will not pay education agent commissions where:

- the overseas student is transferring from another registered provider and has already commenced study with that provider; and
- the movement constitutes a student transfer under the National Code 2018.

This prohibition applies to all forms of commission or consideration, whether monetary or non-monetary, including but not limited to:

- commission fees or percentages;
- service charges or administrative fees;
- bonuses, incentives or performance payments;
- gifts, rebates, discounted services or any other benefit provided directly or indirectly to the education agent or an associate of the agent.

No Exception to Commission Ban: The prohibition on education agent commissions for onshore transfers applies to all transferring students accepted for enrolment on or after 1 April 2026. This prohibition applies regardless of compassionate or compelling circumstances, provider default, or any other exceptional situation.

Overseas students may still seek assistance from an education agent to transfer between providers; however, Princeton International College will not pay any commission or provide any benefit to the education agent in relation to such recruitment.

Transitional Arrangement

The prohibition on education agent commissions for onshore transfers does not apply to overseas students who were accepted for enrolment by Princeton International College on or before 31 March 2026. Existing commission arrangements for such students will continue to apply. This transitional arrangement applies only to enrolments accepted prior to the effective date of the legislative changes and does not apply to any enrolments accepted on or after 1 April 2026.

Permitted Commission Payments

Education agent commissions may be paid where:

- the student has completed, or is in the process of completing, their principal course of study before commencing with Princeton International College;
- the student's movement to Princeton International College constitutes further study and does not fall within restricted transfer provisions; or
- the student is progressing through a package of courses for which the student visa was granted, and the College is the approved provider for one or more courses in that package.

Engaging Education Agents Policy & Procedure

In these circumstances, commission payments are made only in relation to the course(s) delivered by Princeton International College and in accordance with the Education Agent Agreement.

Verification and Record Keeping

Prior to processing any commission payment, Princeton International College verifies:

- the student's enrolment and commencement status;
- the nature of the student's movement (transfer or further study);
- compliance with the National Code 2018; and
- the agent's entitlement under the signed agreement.

All commission payments, supporting documentation and verification records are retained on the Education Agent file and form part of the College's financial and compliance audit trail.

2.3 Education Agents Register & PRISMS

Princeton International College maintains a centralised and up-to-date Education Agents Register as part of its governance, quality assurance and compliance framework. The Register provides an accurate record of all education agents who have a current or previous written agreement with the College.

The Education Agents Register includes, but is not limited to, the following information for each education agent:

- legal business name and any trading names;
- name and position of the primary contact person;
- registered business address and operational address (where different);
- contact details including telephone number and email address;
- countries and/or regions in which the education agent operates;
- commencement date of the agreement;
- expiry date and renewal details (where applicable); and
- termination date (where applicable).

The Education Agents Register is reviewed regularly by the Marketing Officer to ensure accuracy, currency and completeness.

Princeton International College will publish and maintain a current list of education agents with whom it works on its website in accordance with ESOS Act requirements. The list will be reviewed regularly to ensure accuracy and currency.

PRISMS Recording and Maintenance

In accordance with the Education Services for Overseas Students Regulations 2019 and the National Code 2018, Princeton International College:

Engaging Education Agents Policy & Procedure

- enters the details of all education agents with whom it has a written agreement into the Provider Registration and International Students Management System (PRISMS);
- ensures that agent details recorded in PRISMS are accurate and kept up to date; and
- updates PRISMS within thirty (30) calendar days of:
 - commencement of an Education Agent Agreement; and
 - termination or expiry of an Education Agent Agreement.

Where an education agent has engaged in recruitment activity for an accepted student, Princeton International College records the agent's involvement in PRISMS in accordance with regulatory requirements.

Record Keeping and Audit Trail

All records relating to the Education Agents Register and PRISMS updates, including confirmations, screenshots and correspondence, are retained on the Education Agent file. These records form part of the College's evidence base for internal reviews, regulatory reporting and external audits.

Princeton International College will maintain records of education agent involvement where an agent has facilitated the enrolment of a student, even where no formal agreement exists.

2.4 Education Agent Marketing Materials

Princeton International College ensures that all approved education agents are provided with accurate, current and authorised marketing and enrolment information to enable ethical, transparent and compliant student recruitment.

Upon approval and execution of the Education Agent Agreement, the following official marketing and student information materials are provided to education agents, as applicable:

- Student Information Handbook
- Marketing brochures and course information materials
- Enrolment application forms
- Course entry requirements, including academic, English language and visa-related requirements
- Relevant College policies and procedures relating to enrolment, fees, refunds, complaints and appeals

The provision of marketing materials may be in electronic format, hard copy format, or both, depending on operational requirements and agent location.

Management and Updating of Marketing Materials

Princeton International College maintains strict controls over the accuracy and currency of marketing materials used by education agents. In this regard:

- The Marketing Officer ensures that education agents are provided with updated marketing materials within fourteen (14) working days of any approved change or update.

Engaging Education Agents Policy & Procedure

- Education agents are formally notified in writing of any updates, amendments or replacements to marketing materials and are instructed to immediately discontinue use of all superseded materials.
- Education agents are required to provide written acknowledgement confirming:
 - receipt of updated materials; and
 - that all outdated or superseded materials have been discarded and are no longer in use.
- Where marketing materials are distributed electronically, agents are required to confirm that outdated versions have been removed from their websites, social media platforms and promotional channels.

Monitoring and Record Keeping

Princeton International College monitors education agents' use of marketing materials through periodic reviews, website audits and spot checks to ensure ongoing compliance.

All correspondence, acknowledgements of receipt, confirmations of disposal of outdated materials and monitoring records are retained on the Education Agent file as evidence of compliance with the National Code 2018 and the Standards for RTOs 2025.

2.5 Student Recruitment & Pre-Enrolment

Education agents engaged by Princeton International College must comply at all times with the Student Recruitment and Pre-Enrolment Policy & Procedures, the National Code of Practice for Providers of Education and Training to Overseas Students 2018, and all relevant legislative and regulatory requirements.

Education agents are required to conduct recruitment activities ethically, honestly and transparently, ensuring that prospective students are provided with accurate, current and complete information to enable informed decision-making.

2.5.1 Education Agent Responsibilities

Education agents must:

- **Identify Agent Involvement**

Clearly identify their involvement in the recruitment of a student by stamping, signing or recording their details on all student application forms and related documentation. This identification serves as evidence of the agent's role in recruitment and supports accurate PRISMS reporting and commission verification.

- **Conduct Pre-Enrolment Interviews (Where Authorised)**

Where authorised by Princeton International College, education agents may conduct an initial pre-enrolment interview with prospective students to obtain background information, including educational history, English language ability and study intentions. Any such interview is preliminary in nature and does not replace the College's own assessment.

Engaging Education Agents Policy & Procedure

• Submit Complete Enrolment Documentation

Submit completed and accurate enrolment documentation, including application forms and supporting evidence, to Princeton International College for formal assessment. Education agents must not issue offers, make guarantees of enrolment or visa outcomes, or represent that enrolment has been approved unless formally confirmed by the College.

2.5.2 College Pre-Enrolment Interview and Assessment

Following referral of a prospective student by an education agent, Princeton International College conducts its own pre-enrolment interview and assessment prior to issuing an offer of enrolment or Confirmation of Enrolment (CoE).

This interview is conducted by the CEO or authorised admissions staff and is independent of any interview conducted by the education agent.

2.5.3 Purpose of the College Pre-Enrolment Interview

The College pre-enrolment interview is undertaken to:

- confirm the student's understanding of the selected course, including duration, delivery mode, assessment requirements and study obligations;
- assess the student's suitability against academic, English language and entry requirements;
- clarify the student's educational background, study objectives and future plans;
- ensure the student understands their obligations under their student visa;
- explain Princeton International College's key policies and procedures, including:
 - fees and refunds,
 - attendance and academic progress requirements,
 - complaints and appeals process,
 - deferral, suspension and cancellation conditions; and
- confirm that the student has received accurate and complete information and is making an informed decision to enrol.

The pre-enrolment assessment process also assists Princeton International College in assessing whether the student appears to be a genuine student and whether the course is appropriate to the student's academic background, study goals and individual circumstances.

2.5.4 Enrolment Decision Authority

All final decisions regarding:

- acceptance of students,
- issuance of offers of enrolment, and
- creation and issuance of Confirmations of Enrolment (CoEs)

remain the sole responsibility of Princeton International College, regardless of any recommendation, assessment or involvement by an education agent.

2.5.5 Record Keeping

Engaging Education Agents Policy & Procedure

All recruitment documentation, agent-conducted interview records (where applicable), College pre-enrolment interview notes and related communications are retained on the student and education agent files as evidence of compliance with the National Code 2018 and the Standards for RTOs 2025.

2.6 Verification of Student Documentation

All student documentation must be verified as originals or certified copies.

Where documentation is found to be non-genuine:

- the agent agreement may be terminated; and
- the student enrolment is reassessed, including possible CoE cancellation.

2.7 Ensuring Education Agent Quality and Performance

Princeton International College undertakes ongoing monitoring of education agent performance to ensure that agents are recruiting genuine students who meet visa, academic and entry requirements and who are likely to successfully complete their studies.

To support this process, monthly internal performance reports are generated and reviewed by the Marketing Officer.

These reports assess outcomes associated with each education agent, including but not limited to:

Student Transfers:

The number of students transferring to another registered provider, including transfers occurring within the restricted transfer period, and the reasons for such transfers.

Student Visa Refusals:

The number and percentage of visa refusals for students recruited by the agent, including analysis of refusal reasons where available.

Student Visa Cancellations:

The number and percentage of student visa cancellations, including cancellations arising from non-compliance with visa conditions or enrolment requirements.

- Identification of High-Risk or Underperforming Agents
- Where analysis of the monthly reports identifies that more than fifty percent (50%) of the students recruited by an education agent and accepted by Princeton International College have experienced negative outcomes (including transfers, visa refusals or visa cancellations), the agent is classified as high-risk or underperforming.

Corrective Action and Performance Management

In such circumstances, Princeton International College implements the following corrective actions:

Written Notification:

The education agent is formally notified in writing of the identified concerns, including a summary of the data, trends and outcomes giving rise to the performance issue.

Targeted Training and Support:

The agent is provided with targeted training and guidance, which may be delivered face-to-face, by telephone or via online meeting platforms. Training focuses on:

Engaging Education Agents Policy & Procedure

- student visa integrity;
- genuine student assessment;
- entry requirements and documentation standards;
- recruitment obligations under the National Code 2018.

Performance Management Period:

The agent is placed under a formal performance management period of three (3) months, during which recruitment activity is closely monitored. Additional reporting or approval controls may be applied during this period.

All actions, communications and training provided are documented and retained on the Education Agent file.

Review and Termination

At the conclusion of the performance management period:

- agent performance is formally reviewed against agreed benchmarks;
- improvements in student quality, visa outcomes and compliance are assessed.
- Where satisfactory improvement is demonstrated, the agent may continue to operate under the existing agreement, subject to ongoing monitoring.
- Where the agent fails to demonstrate sufficient improvement, or where negative outcomes continue at unacceptable levels, Princeton International College will terminate the Education Agent Agreement in accordance with Section 2.10 of this policy.
- Termination decisions and supporting evidence are documented and retained for audit and regulatory purposes.

2.8 Monitoring Agent Activities

Monitoring of education agents is undertaken on an ongoing and systematic basis to ensure continued compliance with the National Code 2018, the Standards for RTOs 2025, and Princeton International College's internal quality assurance requirements.

Monitoring includes, but is not limited to, the following activities:

Regular Meetings

Princeton International College conducts scheduled and ad-hoc meetings with education agents (onshore and offshore) via face-to-face meetings, telephone or video conferencing. These meetings are used to discuss recruitment practices, compliance expectations, student quality, visa outcomes, emerging risks, legislative updates and any identified issues. Minutes or meeting notes are recorded and retained on the agent file.

PRISMS Performance Reports

Monthly and periodic reports are generated from PRISMS to review agent performance, including

Engaging Education Agents Policy & Procedure

enrolment trends, CoE issuance, completion rates, transfers, visa refusals and cancellations. These reports are analysed to identify patterns, risks or concerns relating to the quality of students recruited by each agent.

Student Feedback Surveys

Feedback is collected from students upon commencement and/or orientation regarding their recruitment experience, accuracy of information provided by the education agent, and overall satisfaction with the agent's services. This feedback is reviewed as part of agent performance monitoring and is used to identify any misleading, unethical or inappropriate recruitment practices.

Complaints and Appeals Monitoring

Complaints, appeals or allegations relating to education agent conduct are reviewed as part of ongoing monitoring activities and may trigger corrective action, enhanced monitoring, suspension or termination of the Education Agent Agreement where required.

Marketing Material Reviews

The College regularly reviews education agents' use of Princeton International College marketing materials to ensure accuracy, currency and compliance with approved information. Agents are required to update or remove outdated or incorrect materials immediately when notified.

Website Audits

Education agent websites are audited at least once every three months to verify that information relating to Princeton International College is accurate, current and consistent with approved marketing materials. Written instructions are issued where discrepancies are identified, and compliance is monitored.

Agent Monitoring Database

Princeton International College maintains a centralised Education Agent Monitoring Database as part of its quality assurance and compliance framework. This database includes, but is not limited to, the following records for each education agent:

- details of student enrolments and outcomes linked to the agent;
- student feedback collected upon commencement regarding recruitment and agent conduct;
- records of meetings, communications and training provided to the agent;
- identified issues, risks or non-compliances and corrective actions taken;
- assessment of the quality of students recruited, including visa outcomes, transfers and cancellations; and
- performance review outcomes and decisions regarding continuation, suspension or termination of the agent agreement.

Engaging Education Agents Policy & Procedure

The Education Agent Monitoring Database is reviewed regularly by the Marketing Officer and forms part of the evidence used to assess agent performance, implement corrective action, and support regulatory reporting and audit requirements.

All records of monitoring activities, reviews and decisions are retained on the education agent file in accordance with ESOS and RTO record-keeping requirements.

Princeton International College conducts periodic reviews, at least annually, of education agent fit and proper status and conflict of interest declarations. Education agents must submit updated declarations where there are changes in ownership, management, or business relationships. Updated declarations are retained on the education agent file as part of the College's governance and compliance framework.

2.9 Monitoring Agent Websites

- Agent websites are reviewed at least once every three months.
- Agents are required to update incorrect information within 10 working days of notification.

2.10 Termination of Agent Agreements

Princeton International College reserves the right to terminate an Education Agent Agreement in order to protect the interests of overseas students, ensure compliance with the ESOS framework, and uphold the integrity and reputation of Australian education.

Termination of an Education Agent Agreement may occur under one or more of the following circumstances:

2.10.1 Immediate Termination for Serious Breaches

Princeton International College may terminate an Education Agent Agreement with immediate effect where the College becomes aware of, or reasonably suspects, that the education agent, or its employees or subcontractors, has engaged in serious misconduct or non-compliant practices, including but not limited to:

- dishonest, misleading or unethical recruitment practices;
- facilitation of enrolment of non-genuine students;
- provision of false, inaccurate or misleading information to students;
- facilitation of visa non-compliance or student visa breaches;
- creation or facilitation of non-bona fide Confirmations of Enrolment (CoEs) in PRISMS;
- providing immigration or migration advice without authorisation under the Migration Act 1958;
- breaches of the National Code 2018, including Standard 4 or Standard 7; or
- conduct that may damage the integrity, reputation or regulatory standing of Princeton International College or the Australian international education sector.

Engaging Education Agents Policy & Procedure

Where immediate termination occurs:

- written notice is provided to the education agent outlining the reasons for termination;
- the termination takes effect immediately upon issuance of the notice; and
- Princeton International College will cease accepting any further students from the agent.

Where the misconduct is attributable to an employee or subcontractor of the agent, the College may require the agent to immediately terminate that relationship. Failure to do so may result in termination of the Agreement.

2.10.2 Termination with Written Notice

Either party may terminate the Education Agent Agreement by providing thirty (30) days' written notice to the other party.

Termination under this clause may occur for reasons including, but not limited to:

- changes in business strategy or recruitment markets;
- organisational or structural changes;
- ongoing underperformance or failure to meet agreed performance benchmarks;
- repeated minor breaches that remain unresolved despite corrective action; or
- mutual agreement to discontinue the relationship.

During the notice period:

- the education agent must continue to comply with all obligations under the Agreement;
- no new recruitment activities may be commenced unless otherwise authorised by Princeton International College; and
- all applications and student fees received up to the termination date must be submitted to the College

2.10.3 Termination Due to Inactivity

The Education Agent Agreement will lapse or may be terminated where the education agent:

- does not refer any international students to Princeton International College within the first twelve (12) months of the commencement of the Agreement; or
- fails to demonstrate genuine recruitment activity during a period agreed in writing.

Written notification of termination will be provided to the agent where termination occurs due to inactivity.

2.10.4 Post-Termination Obligations

Upon termination of the Education Agent Agreement, the education agent must, within seven (7) days:

- submit to Princeton International College all student applications and course fees received prior to termination;

Engaging Education Agents Policy & Procedure

- immediately cease using Princeton International College's name, logo, branding and promotional materials;
- return or securely destroy all marketing, promotional and confidential materials supplied by the College; and
- cease representing itself as an authorised education agent of Princeton International College.

2.10.5 Regulatory Notifications and Record Keeping

Princeton International College will:

- update PRISMS within 30 days of termination;
- notify relevant government bodies where required, including the Department of Home Affairs and, where applicable, Australian diplomatic missions (for offshore agents);
- retain all termination notices, correspondence, supporting evidence and meeting records on the Education Agent file.

Termination of the Agreement does not affect any accrued rights or remedies of either party prior to termination.

2.10.6 Refusal to Undertake Corrective Action

Where an education agent refuses or fails to undertake required corrective or preventive actions within specified timeframes, Princeton International College may terminate the Agreement **immediately**, without further notice.

All terminations are documented and reported as required.

2.11 Re-appointment of Agents

Following satisfactory performance review, agents may be re-appointed under a new agreement reflecting updated regulatory requirements.

2.12 Continuous Improvement

Princeton International College regularly reviews education agent management practices through monitoring activities, student feedback, visa outcomes, complaints, PRISMS data, internal reviews and governance processes to ensure ongoing compliance and continuous improvement.

Issues, risks, trends and improvement opportunities identified through education agent monitoring are recorded within the Continuous Improvement Register and reviewed through management and governance processes under the oversight of the CEO.

Corrective and preventive actions relating to education agents are monitored through to completion and reviewed for effectiveness.

Engaging Education Agents Policy & Procedure

3.0 Records Management

Princeton International College maintains accurate, complete and secure records relating to education agent appointments, agreements, monitoring, communications, performance reviews, complaints, corrective actions and termination processes.

All education agent records are maintained in accordance with the Records Management Policy and Procedure, ESOS Act 2000, National Code 2018 and applicable regulatory requirements.

Records are securely stored within authorised institutional systems with access restricted to authorised personnel only.

Education agent records may include:

- education agent agreements
- agent applications and due diligence records
- monitoring and performance review records
- communication records and meeting notes
- student and stakeholder feedback relating to agents
- complaints, incidents and corrective actions
- training and compliance updates provided to agents
- termination or suspension records where applicable

The CEO maintains oversight of education agent records management and compliance monitoring processes.

Appendix A- Education Agent Agreement