



**ASSOCIATION OF
AUSTRALIAN EDUCATION
REPRESENTATIVES IN INDIA**

Registered under the Societies Registration Act XXI 1860
Registration No: S-31213 of 1997

Mailing Address:

1018 Hemkunth Chambers
89 Nehru Place, New Delhi 110019
E-mail: aaeri@aaeri.in
Website: www.aaeri.org.in

05/Jun/2023

To
Mathew Johnston
Minister – Counsellor (Education & Research)
Australian Government Department of Education
Australian High Commission, New Delhi

Dear Matt

Currently the behaviour of education agents, integrity issues, agent-institute relationship, have been an on-going topic of discussion. We would like to make the following submission via your office to various stakeholders in the industry:

“How Australia can remain internationally competitive and provide a quality student experience.”

- More publicity on study opportunities and more promotion of benefits such as world-class qualifications and extended post study work
- Raising international students’ awareness of financial aid/scholarships, Australian institutes must offer more scholarships to students with high academic records
- Improving the experience of international students and including work integrated learning
- Support organisations such as AAERI in self-regulation
- GTE must be consistent among all institutes
- Link student visas to the education provider
- Open Study in Australia Education Hub’s in few major cities of India
- Education providers should publish an annual ‘Employment report’ which provides details about the jobs in demand and past employment record of its graduates.
- Travel concessions (local public transport) for all International students irrespective of their course level must be provided

“What guidance or requirements for providers would be appropriate or helpful in managing the education agents from whom they accept students”

Education Agents role is extremely important role. Overall selection, training, monitoring, support and rewarding are all part of the institute-agent relationship and all closely linked to ensure integrity. On the other hand, prospective students would expect the agent to have detailed first-hand information on all aspects of the country, institute and other protocols

- Institutes must check the profile and expertise of education agents and appoint them after conducting transparent due-diligence
- Ensure that there is no conflict of interest
- Ensure that all agents are trained and have thorough knowledge of Australian education system and related topics (courses, admission requirements, ESOS framework, visa procedures, code of ethics etc)



ASSOCIATION OF AUSTRALIAN EDUCATION REPRESENTATIVES IN INDIA

Registered under the Societies Registration Act XXI 1860
Registration No: S-31213 of 1997

Mailing Address:
1018 Hemkunth Chambers
89 Nehru Place, New Delhi 110019
E-mail: aaeri@aaeri.in
Website: www.aaeri.org.in

- Institutes must publish the list of agents in each and every country / city on their website
- The Confirmation of Enrolment (CoE) in PRISMS must have the name of the agent
- Institutes must work closely with agent associations such as AAERI and only appoint such agents, self-regulation is the way forward
- Providing more clarity on Standard 7 of the National Code (ESOS) on principal agent and sub agent relationship.

“How to keep agent commissions “at manageable levels”

For students and their parents, Education Agents are very important source as they provide support for the complex decisions and processes associated with studying abroad. For institutions, agents are important extension of institutional support services for prospective and incoming students.

The commissions being paid to agents is commercial confidential decision based on value proposition of the agency

- ·Must have a mechanism so ‘double-dipping’ – charging both students and educators for their services can be avoided
- ·Institutes must require their agents to develop transparent business relationships with students via written agreements and encourage business ethics
- ·Institutes that are marketing their courses by luring agents with more commissions to agents should be strictly termed as unethical practice. (Such acts are a clear indication that agents or institutes are not acting in the vested interests of the students - commercial gains is the motive).

“Ways to hold agents “accountable for unscrupulous behaviour”

- ·Track agent performance record and take action and terminate agreements in case of any breach
- ·Institutes must become aware of the threats of appointing “Aggregators”
- ·Should have a clear code to make the contracting agent and institution more accountable around the “sub-agent” use beyond referrals. (hire & fire formula not acceptable and has risks)

Issues with student transfers before 6 months and unethical poaching onshore

- Review COE’s, make it mandatory to add agent’s details to the COE on PRISMS
- Remove the concurrent COE’s (Students must be allowed to enrol in the second program only with the verification of enrolment {VOE})
- Release letter mandatory and No transfers within the first 12 months
- Ban / stop commissions for shore movement within first 12 months
- ·ASQA and TESQA must strictly monitor institute / agent activities and follow up on unscrupulous activities



**ASSOCIATION OF
AUSTRALIAN EDUCATION
REPRESENTATIVES IN INDIA**

Registered under the Societies Registration Act XXI 1860
Registration No: S-31213 of 1997

Mailing Address:

1018 Hemkunth Chambers
89 Nehru Place, New Delhi 110019
E-mail: aaeri@aaeri.in
Website: www.aaeri.org.in

Student Visas

- Link student visas to institutions and make it mandatory for reapplication of student visa if changing provider or program onshore
- Applicants (students) should not be punished if they have a PSW ambition
- PRISMS agent data should be linked with the Department of Home Affairs visa lodgement details. (Visa applications should be lodged by the Principal agent)
- Students who have their student visas declined for some reason, should be given COE to relodge the application

TAFE - Australia

- TAFE Australia must be purposely separated out from the private VET sector
- Students must be encouraged to study at world-class Australian TAFE towards technical level vocational, trade or professional qualifications. TAFE needs to be promoted in the sub-continent

Since there is deliberations going on in Canberra around changes and policies, it is our hope that the voice of offshore agents is also included and so this is being shared. Thank you for giving us the opportunity to make this submission.

Yours Sincerely

Nishidhar Reddy Borra

President AAERI

Mobile: +91 9949242222

Copy to:

1. Reuben Gray, Counsellor (Immigration), Department of Home Affairs, New Delhi
2. Nathaniel Webb, Counsellor (Education and Research) – South Asia
3. Monica Kennedy, Sr Trade and Investment Commissioner, Austrade