1.1.0 Student Recruitment Framework

1.0 Rationale

In August 2023, TEQSA, the Tertiary Education Quality and Standards Agency, an Australian government agency responsible for ensuring the quality of higher education in Australia, noted considerable concerns in recruiting international students (https://www.teqsa.gov.au/sector-alert-recruitment-admission-support-overseas-students). This underscores the necessity for Acknowledge Education (AE) to have strong recruitment and admission procedures bolstered by vigilant oversight and self-evaluation mechanisms. AE addresses this through this framework, prioritising ethical conduct and clear communication. This comprehensive approach serves a twofold purpose: ensuring the well-being and respect of international students and meeting regulatory requirements to enhance AE's standing as an education provider. This framework consolidates various operational procedures within AE to meet its objectives consistently. The framework delves into four primary areas:

Educational Agent Representation: Collaborations with educational agents are critical in reaching potential students globally. By emphasising ethical engagements with these agents, AE assures students of a trusted and honest introduction to their preferred learning pathways.

Student Recruitment and Admissions: Clear, transparent, and comprehensive information is pivotal for students making transformative life decisions. Aligning practices with recognised standards like HESF and the National Code amplifies AE’s commitment to educational best practices with overseas students.

Student Support and Transition: Transitioning to a new educational system and culture can be daunting. AE's orientation and support services are structured, recognising this challenge, and ensuring students feel supported, understood, and equipped to succeed.

English Proficiency: English, often an additional language for many overseas students, is paramount for academic success. AE's tiered approach ensures students not only adapt to academic demands but also to professional environments.

Risk Management and Mitigation: In an era of rapid change, educational institutions must be agile in identifying and nimble in mitigating risks. AE’s proactive approach, guided by AE’s Risk and Compliance Committee (RCC), serves as a protective shield, ensuring the institution's and students' interests are always safeguarded.

This framework represents AE's commitment to excellence, integrity, and student welfare, ensuring that overseas students have an enriching and supportive educational experience.

2.0 Scope

This framework outlines AE's strategies, principles, and practices in engaging with educational agents, recruiting, supporting, and admitting overseas students. This document is paramount for all key internal and external stakeholders of AE.

3.0 Regulatory Context

When recruiting overseas students, under the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) and the Higher Education Standards Framework (Threshold Standards) 2021 (HES Framework), registered providers have obligations. These obligations are outlined in the table below (from https://www.teqsa.gov.au/sector-alert-recruitment-admission-support-overseas-students) .

Obligation	Standard
Recruit responsibly and ensure students are appropriately qualified for, and well-informed about, their chosen course of study	Standard 2 of the National Code Standard 1.1.1 of the HES Framework
Ensure their education agents act ethically, honestly and in the best interests of overseas students	Standard 4 of the National Code
Safeguard the integrity of Australia's migration laws by supporting overseas students in fulfilling their visa requirements	Standard 8 of the National Code Standard 7.2.3 of the HES Framework
Ensure representations of the higher education provider, its educational offerings and charges are accurate and not misleading	Standard 7.1.1 of the HES Framework
Monitor the performance of agents, taking prompt corrective action in the event or likelihood of misrepresentation or unethical conduct	Standard 7.1.4 of the HES Framework
Maintain updated enrolment information in the Provider Registration and International Student Management System (PRISMS) database	Standard 9 of the National Code

4.0 Educational Agent Representation

AE has a policy for Engaging Educational Agents that ensures the ethical engagement of agents, emphasising transparency, honesty, and the best interests of overseas students. The policy sets clear directives for initiating written agreements with agents, outlining agents' responsibilities, the mandatory monitoring of agents' performance, and provisions for terminating engagements. Agents must act without conflict of interest, maintain confidentiality, and prioritise the welfare of the students. AE commits to continuous monitoring, including annual audits of agent performance and compliance, and terminates any relationship with agents found to be acting unethically or against the provisions of the policy.

AE's "Engaging Educational Agent Procedure" elaborates on the "Engaging Educational Agents Policy" details. While the policy offers a broad overview of the intended actions, the procedure delves deeper, providing specific instructions to operationalise the policy. This procedure not only amplifies the content of the policy but also describes a clear method to achieve the policy's goals and objectives.

At the heart of this process is AE's commitment to maintaining the integrity and quality of its recruitment practices, ensuring the well-being of its students, and upholding its obligations under the ESOS Act and National Code 2018.

5.0 Student Recruitment

AE ensures prospective students receive transparent and comprehensive information about admissions, course requirements, and obligations. AE aims to establish clear and informed arrangements with students, including disclosure of fees, obligations, withdrawal procedures, and

support for international students. In achieving these objectives, our practice aligns with the standards outlined in the 2021 Higher Education Standards Framework (HESF, Sections 1.1 to 1.3) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code, Standard 6 and Standard 8).

5.1 Admissions

The policies and procedures addressing section 1.1 to 1.3 of the HESF include:

- AE's Marketing Integrity and Compliance Policy,
- AE's Student Enrolment Procedure, Admissions Policy, and
- AE's Admissions Policy and Procedure for Overseas Students.
- AE's Awarding Credit in Higher Education Programs Policy and Procedure.

Collectively, these documents serve to achieve the following objectives:

5.1.1 Marketing Integrity and Compliance: Ensuring that students receive accurate and transparent information about our course offerings, reflecting our values of honesty and integrity in our interactions with all stakeholders. Our marketing practices ensure that students and educational agents can access all the information necessary to make informed decisions about their educational journeys.

5.1.2 Enrolment and Admissions Policies: Reinforcing our commitment to transparency by providing detailed descriptions of the contractual arrangements between AE and students during the admissions process. AE ensures that all prospective students know the necessary requirements to access our courses, including information about fees and charges, course progress requirements, refund policies, English language thresholds and the credit for prior learning options. Our rigorous admissions process aims to prevent the admission of ill-prepared or unlikely-to-succeed students.

5.1.3 Genuine Student Assessment: The Genuine Student (GS) Admission Procedure supports compliance with Ministerial Direction 106, which outlines the Genuine Temporary Entrant (GTE) requirements for Subclass 500 (Student) visa applications. This procedure strengthens AE's alignment with regulatory standards, ensuring that offers are issued to students who demonstrate a genuine intent to study in Australia.

The GS Admission Procedure ensures a robust assessment process that includes:

- **Genuine Student Application Form**: Captures personal, academic, and immigration history details.
- **Genuine Student Financial Matrix**: Verifies financial capability to meet study and living expenses.
- **Genuine Student Questionnaire**: Documents the applicant's purpose and rationale for selecting AE courses.
- **Supporting Documentation Checklist**: Ensures comprehensive submission of required evidence.

5.1.4 Credit and Recognised Prior Learning. The policy and associated procedure that addresses section 1.2 of the HESF is: Awarding Credit in Higher Education Programs Policy and Procedure. AE is committed to maintaining the integrity of awarded qualifications and ensuring that granting credit does not disadvantage students or compromise educational standards. The policy emphasises transparency,

consistency, and integrity in the credit transfer process while ensuring the learning outcomes of qualifications are maintained.

5.2 Enrolment, Orientation and Course Progress

The policies and procedures in place that address section 1.3 of the HESF are:

Student Enrolment Procedure, Course Orientation Policy, Course Progress and Completion Policy and Course Progress and Completion Procedure. These policies and procedures work together to prepare students for success and support students at risk of not achieving academically.

AE has established a comprehensive student enrolment procedure to ensure transparency, equity, and support for all prospective students. The process spans from initial application, where students review course offerings and gather required documentation, to final enrolment. Key stakeholders in this procedure range from student-facing roles to the quality assurance manager and the sales and marketing team.

AE's Student Orientation Policy is designed to facilitate a smooth transition for students into Australia's academic and cultural environment. The comprehensive orientation program offers an introduction to studying and living in the country, covering vital aspects like medical and emergency services, legal rights, and employment guidance with a focus on the Fair Work Ombudsman's role. The program familiarises students with campus facilities, the teaching staff, and available resources within the AE institution. AE's adherence to the Education Services for Overseas Students framework is integral to the policy, ensuring that staff interactions are informed and supportive. Orientation covers many areas, from the learning environment and course specifics to personal safety and health. Additionally, provisions are made for late arrivals and various communication formats to enhance the effectiveness of the orientation process.

Course Progress and Completion Policy and Procedure aim to monitor and assess students' course progress, identify those at risk of poor progress, and provide them with the necessary support to achieve academic success. These documents establish intervention strategies to support students identified as 'at risk' and set attendance requirements to ensure active study engagement. They also address reporting and compliance with regulatory requirements, provide an appeals process, and define circumstances under which a student may be excluded from the course.

5.3 English Proficiency

AE’s approach to English proficiency is firmly rooted in the belief that it is not a monolithic or static skill but a dynamic continuum that evolves with a student's academic and professional journey. This philosophy can be encapsulated in the three-tiered understanding of English proficiency: General, Academic, and Professional English proficiency development.

At the base is General English, which sets the foundation for more complex competencies. It encompasses reading, writing, listening, and speaking skills, ensuring students can navigate daily life and understand broad contexts. At AE, we are committed to ensuring that all students admitted to our College have the necessary English language proficiency to commence the course they wish to complete. As such, English proficiency is a key component of our admissions processes. No students are admitted to AE unless they have demonstrated the necessary level of English proficiency for entry to their chosen course.

The next layer, Academic English, is pivotal for students in higher education settings. It delves deeper, equipping students with the skills to comprehend complex texts, participate in academic discussions, construct well-reasoned arguments, and navigate the nuanced linguistic demands of higher education. At AE we have academic support services in each of our campuses where students can access one-on-one assistance for any form of academic writing support. In addition, our academic support teams frequently run free workshops for students on various academic writing topics. We also understand the importance of students having access to teaching staff. At AE, we have enshrined in policy the priority for staff to provide time to work with students, particularly where they may be struggling with academic work. Teaching staff are also provided an additional hour of consultation time for each unit they teach to ensure they can work specifically with students who may need additional support.

The culmination of this progression is Professional English. Beyond the classroom, students must be adept at utilising English in their chosen professions, interpreting industry-specific jargon, communicating effectively in professional settings, and understanding the subtleties and cultural nuances of the professional world. To assist students in developing their professional English proficiency, AE incorporates work-based placements in courses and encourages authentic teaching practices and assessments where students engage in presentations and roll-plays to develop their professional English use.

AE's commitment to the ongoing development of English proficiency ensures that by the end of their course, students are given every opportunity to develop into academically competent and empowered graduates with the robust English language skills they need to thrive in professional settings.

6.0 Monitoring for Risk Management and Mitigation

Robust governance oversight is vital for AE to effectively demonstrate adeptness in identifying, analysing, and mitigating risks associated with recruiting, admitting, and supporting overseas students. TEQSA emphasises that to understand these risks genuinely, institutions like AE must actively monitor and evaluate the performance of international student groups.

AE's Risk and Compliance Committee (RCC) is an integral sub-committee established by AE's Board of Directors (The Board). It plays a pivotal role in overseeing risk and compliance matters related to AE. The RCC's core mandate is to scrutinise, advise, recommend, and report on all issues concerning risk and compliance to The Board. The overarching aim of the RCC is to aid The Board in the creation and sustenance of robust risk management and compliance programs, ensuring that AE consistently meets its obligations while effectively navigating risks.

As TEQSA announced a Sector Alert on 11th August 2023 to highlight recruitment, admission and support of overseas students as a substantial risk area, AE's RCC adopted this risk as a priority area of focus for identifying, analysing and responding to risk in this area.

Specifically, the RCC will scrutinise student outcomes within their initial six months of study and beyond. Further processes that allow AE to identify and understand students' attrition more completely are expected to assist AE in identifying students that may not have been adequately prepared for their courses. Such a process includes follow-up with a sample of students recorded as non-starts, non-completions, and unsatisfactory academic progress. Reports from the RCC will be forwarded to AE's Academic Board and The Board to formulate robust strategies for risk mitigation.

In conclusion, Acknowledge Education's Student Recruitment Framework epitomises our commitment to creating and sustaining a transparent, ethical, and supportive environment for overseas students. Grounded in regulatory adherence and a genuine concern for student welfare, the framework serves as a blueprint for engaging, admitting, and developing our student community. By unifying best practices, rigorous oversight, and proactive risk management, AE upholds its reputation and ensures that every overseas student embarks on a transformative educational journey with us.

7.0 Definitions

Key Term	Definition
Academic Board	A formal committee responsible for academic governance, including setting and maintaining academic standards within an educational institution.
Educational Agent	An individual or agency that provides advice and placement services to students seeking to study overseas, typically receiving a commission.
ESOS Act	Education Services for Overseas Students Act, Australian legislation governing the education of overseas students.
HES Framework	Higher Education Standards Framework, a regulatory instrument outlining the standards for higher education providers in Australia.
National Code	A set of nationally consistent standards that governs the protection of overseas students and delivery of courses to these students by providers.
PRISMS database	Provider Registration and International Student Management System, an Australian government system used to process information for overseas students.
RCC	Risk and Compliance Committee, a sub-committee focused on identifying, analysing, and mitigating risks within an institution.
TEQSA	Tertiary Education Quality and Standards Agency, the Australian government agency responsible for regulating higher education.

8.0 Related Documents

Document Name
1.1.3 Student Enrolment Procedure
1.1.1 Admissions Policy for Overseas Students (HE and VET)
1.1.8 Genuine Student Admission Procedure
1.1.2 Admissions Procedure for Overseas Students (HE and VET)
1.2.1 Awarding Credit in Higher Education Policy
1.2.2 Awarding Credit in HE Procedure
1.3.1 Course Orientation for Students Policy
1.3.3 Course Progress and Completion Policy
1.3.4 Course Progress and Completion Procedure
1.4.1 Student Assessment and Awarding of Grades Higher Education Courses Policy
1.4.3 Course Development, Review and Approval Policy and Procedure
2.2.1 Respecting Diversity and Facilitating Access and Equity Policy and Procedure
3.2.2 Academic Teaching, Training and Administrative Staff Policy
3.2.3 Teaching Staff Engagement and Assessment Procedure
5.2.1 Fostering Academic Integrity Policy
5.3.1 Moderation, Validation and External Referencing Policy
5.3.2 HE Moderation, Validation and External Referencing Procedure
7.1.2 Engagement of Educational Agents Policy
7.1.3 Engagement of Educational Agents Procedure
7.2.1 Sales Material Integrity and Compliance Policy

9.0 Document Information

Document Name	Student Recruitment Framework
Document Number	1.1.0
Purpose	This framework serves two purposes ensuring the well-being and respect of international students and meeting regulatory requirements to enhance AE's

	standing as an education provider. This framework consolidates various operational procedures within AE to meet its objectives consistently.
Audience	All AE Stakeholders
Category	Student Participation and Attainment
Subcategory	Admissions
Approval Date	30/10/2024
Effective Date	23/10/2023
Review Date	Under review as at April 2026
Policy Advisor	The Registrar
Approving Authority	Board of Directors
Contact	Quality Assurance Regulator.compliance@ae.edu.au

10.0 Change Log

Date	Version	By	Notes
12/8/2023	1.0	Narelle Whatley (Dean)	Framework constructed to guide the focus of AE student recruitment process considering identified risks by TEQSA.
30/06/2024	1.1	Narelle Whatley	Updated framework to include new GTE Procedure
30/10/2024	1.2	Narelle Whatley (Dean)	The Academic Board reviewed and determined the following changes, which have been implemented: The Registrar should replace the Dean as the policy advisor. The BoD should replace the AB as the approving authority.