# FFPOS Education Agents Policy

Policy Audience: Public Document

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| | Help for non-English speakers.<br>If you need help to understand this policy, please contact us at enquiries@kilvington.vic.edu.au |

## 1.0 Rationale

Education Agents play a vital role in connecting prospective international students with Australian educational institutions competing in the international education industry. In playing this vital role, the ethics and procedures followed by Education Agents are of crucial importance to maintaining Australia's high reputation for its international educational quality and services.

To this end, Kilvington Grammar School (the School) is committed to appointing and working with Agents demonstrating:

- A comprehensive understanding of international students' requirements, Australian culture and Australia's education system in general.
- The nature of Education Centre of Australia programs, policies and requirements in particular.
- Honesty, integrity and the highest ethical standards.

## 2.0 Purpose

The purpose of this Full Fee Paying Overseas Student Education Agent Monitoring Policy (the Policy) is to outline how the School will comply with all legislative and regulatory requirements established under the:

- Education Services for Overseas Students Act 2000 (Cwlth) Act (ESOS Act).
- Education Services for Overseas Students Regulations (ESOS Regulations).
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cwlth) (National Code).

## 3.0 Scope

The School enters into an Education Agent Contract with each Education Agent it engages to formally represent it. The agreement specifies the responsibilities of the Education Agent and the School and the need to comply with the requirements in the National Code.

These requirements are effectively summarised under National Code Standard 4 which aims to strengthen *'the ability of providers to manage the activities of their education agents, ensuring providers use only reputable education agents.'*

Intending students will benefit from the monitoring strategies of the School and from the School's ability to terminate agreements with an Education Agent who engages in false or misleading recruitment practices.

## 4.0 Policy

Education Agents are monitored formally by the Director of Admissions and by checking International Education Agent Performance Reports annually via PRISMS.

Education Agents are monitored informally by the International Student Coordinator via feedback from students, families and colleagues.

For more details, please refer to **Appendix A** of this Policy.



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Education Agents are engaged to formally represent the School under the following conditions:

1. The Education Agent agrees to comply with the requirements of Standard 4 in the National Code, including:
   a. Declaring in writing and taking reasonable steps to avoid conflicts of interests with any duties as an Education Agent representing the School (Standard 4.3.1).
   b. Observing appropriate levels of confidentiality and transparency in dealings with overseas students. or intending overseas students (Standard 4.3.2).
   c. Acting honestly and in good faith, and in the best interests of the student (Standard 4.3.3).
   d. Having appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics (Standard 4.3.4).

2. The Education Agent signs and abides by the conditions of the School's written Education Agent Agreement.

3. The Education Agent responds appropriately to the School's monitoring activities and corrective and preventative action, and understands the grounds for termination of agreement as outlined in Standard 4.4 of the National Code.

4. The Education Agent accurately promotes the services and facilities provided by the School and uses up to date marketing materials as supplied by the School.

5. The School will not accept a student from an Education Agent if it is known or suspected at any time that the Education Agent:
   a. engages in or has previously engaged in dishonest practices;
   b. deliberately attempts to recruit a student within the first six months of that student's study in their first registered school sector course with another provider;
   c. facilitates the enrolment of a student he/she believes will not comply with visa conditions, or is not a bona fide student, or
   d. provides immigration advice where they are not authorised to do so under Migration Act (Cwlth) (1958).

6. The School will monitor the activities of the Education Agent in representing it (the School) and to ensure the Education Agent is giving students accurate and up-to-date information regarding the services provided by the School. For details, please refer to the Process for Monitoring Education Agents as outlined in **Appendix A** of this Policy.

7. The School may receive a student enrolment application from an Education Agent on behalf of the parent/legal guardian. As the Education Agent has not been engaged by the School to formally recruit students on the School's behalf, such an agent would fall outside the scope of National Code Standard 4.

8. A list of Education Agents with whom the School has a formal written agreement are listed on the School's website and is readily available to students and regulators.

9. The School enters and keeps up-to-date details about Education Agents with whom the School has a formal written agreement in PRISMS.

10. Information provided about education agents includes at a minimum:
    a. Agency name
    b. Name of principal agent
    c. Legal entity of agency



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d. Street address(es) of agency
e. Business email
f. Telephone number

11. The School will not accept students from an agent that is using PRISMS to create CoEs for other than bona fide students.

**5.0 Responsibilities**

1. The Director of Admissions is responsible for the implementation of this policy, reporting to the Principal and International Student Coordinator as needed.

2. It is the responsibility of the Director of Admissions to monitor and assess the performance of the School's Education Agents.

Ultimately, decisions about continuing to engage any Education Agent to recruit students for the School is at the Principal's sole discretion.

**6.0 Relevant Legislation and Standards and Related Documents**

**6.1 Relevant Legislation and Standards**

- Education Services for Overseas Students Act (Cwlth) (2000).
- Education Services for Overseas Students Regulations.
- Migration Act (Cwlth) (1958).
- National Code of Practice for Providers of Education and Training to Overseas Students (2018).
- Victorian Child Safe Standards (2022).

**6.2 Related Documents**

- Child Safety and Wellbeing Policy.
- Complaints Resolution Policy (Parents, Guardians and Students) Policy.
- Full Fee Paying Overseas Student Academic Progress and Attendance Policy.
- Full Fee Paying Overseas Student Assessment of English Language Proficiency Policy.
- Full Fee Paying Overseas Student Business Regulations: International Students Enrolment and Written Agreement.
- Full Fee Paying Overseas Student Education Agents Policy.
- Full Fee Paying Overseas Student English Language Proficiency Policy.
- Full Fee Paying Overseas Student Enrolment Policy.
- Full Fee Paying Overseas Student Enrolment Deferment, Suspension or Cancellation Policy.
- Full Fee Paying Overseas Student Refund Policy.
- Full Fee Paying Overseas Student Younger Overseas Student Policy.
- Kilvington Grammar School Education Agent Agreement.
- Kilvington Grammar School Homestay Responsibility Agreement.
- Privacy Policy.

**7.0 Evaluation**

**Policy last reviewed: August 2026**
**Approval: The Executive**
**Review cycle: 5 years**



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**APPENDIX A: PROCESS FOR MONITORING EDUCATION AGENTS**

1. It is the School's practice to maintain an agreement with an Education Agent where that agreement is in the best interest of all stakeholders.
2. The Principal and the Director of Admissions and International Student Coordinator will monitor the performance of the Education Agent. The School will take immediate corrective and preventative action if it becomes aware of the Education Agent being negligent, careless or incompetent. The School has the right to immediately terminate this Agreement if the Education Agent breaches any of its obligations, or acts in a negligent, careless or incompetent manner. For more information, please refer to the Education Agent Agreement.
3. The Director of Admissions maintains frequent email correspondence with Education Agents. As part of this contact, the Director of Admissions will remind the Education Agent of the School's expectation that it (being the School) expects:
   - To be represented in an honest and ethical manner by the Education Agent.
   - The Education Agent is giving students accurate and up-to-date information on the School's services.
4. When the opportunity to have face-to-face meeting either in Australia or in the Education Agent's local setting presents itself, the Director of Admissions conducts such meetings.
5. The Director of Admissions will ensure the Education Agent provides written evidence of their prospectus before the School enters into any Education Agent Agreement.
6. The Director of Admissions will, where required, pursue referrals regarding an Education Agent from other registered providers.
7. The Director of Admissions will provide the Education Agent with any new or updated information that is necessary to ensure they can provide overseas or intending overseas students with accurate information.
8. The Director of Admissions will, where required, write to the Education Agent to follow-up on any erroneous information about the School being disseminated by the Education Agent.



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