



<b>Type:</b> Overseas Students – CRICOS Policies and Procedures	<b>Name:</b> Engaging and Monitoring Education Agents' Policy	<b>Policy No:</b> OS-0006
<b>Implementation Date:</b> 2015	<b>Last Reviewed:</b> December 2023	<b>Next Review Date:</b> December 2025

## Engaging and Monitoring Education Agents' Policy

### Purpose

This policy outlines the steps taken to ensure the responsibility St Hilda's School has in formally engaging Education Agents.

### Context

Education agents are engaged to formally represent St Hilda's School under the following conditions.

### Scope

The education agent agrees to comply with the requirements of Standard 4 in the National Code of Practice for Providers for Education and Training to Overseas Students 2018, including:

- declaring in writing and taking reasonable steps to avoid conflicts of interests with any duties as an education agent representing St Hilda's School (St 4.3.1).
- observing appropriate levels of confidentiality and transparency in dealings with overseas students or intending overseas students (St 4.3.2).
- acting honestly and in good faith, and in the best interests of the student (St 4.3.3).
- having appropriate knowledge and understanding of the international education system in Australia, including the [Australian International Education and Training Agent Code of Ethics](#) (St 4.3.4).

The education agent signs and abides by the conditions of the School's written agency agreement.

The education agent responds appropriately to the School 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 of Practice for Providers for Education and Training to Overseas Students 2018.

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.

The Agent must participate in a range of activities to review the performance of the Agent. These activities may include but are not limited to:

- A regular review of the Agent's performance, to be undertaken at least every six months at the discretion of St Hilda's School including a record of inquiries and outcomes.
- Spot checks to be undertaken by representatives of St Hilda's School both at the agent's premises and at promotional events where possible.
- A yearly survey of parents of students and students recruited by the Agent.

- The Australian Government Department of Education and Training’s review and publication of PRISMS data on student outcomes associated with international education agents in Agent Performance Reports.

St Hilda’s School will not accept a student from an education agent if it is known or suspected at any time that the agent:

- engages in or has previously engaged in dishonest practices;
- 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;
- facilitates the enrolment of a student he/she believes will not comply with visa conditions, or is not a bona fide student, or
- provides immigration advice where he/she is not authorised to do so under the Migration Act 1958.

St Hilda’s 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 of Practice for Providers for Education and Training to Overseas Students 2018 Standard 4.

A list of education agents with whom the school has a formal written agreement are listed on the home page of St Hilda’s School’s website and is readily available to students and regulators.

St Hilda’s School enters and keeps up to date details about education agents with whom the school has a formal written agreement in Provider Registration and International Student Management System (PRISMS).

Information provided about education agents includes at a minimum:

- the agent’s name
- the address of the agent’s principal place of business
- if the agent is a body corporate – the address of the body corporate’s registered office
- the agent’s postal address (if different from address for principal place of business/registered office)
- the agent’s phone number, email address and website address (if any)
- the agent’s ABN or ACN (if any)
- the agent’s trading name or names (if any)
- if the agent is a body corporate – the names of the body corporate’s directors
- if the agent is a registered migration agent – the agent’s Migration Agents Registration Number
- the following information about each of the agent’s employees (if any) who are involved in the agent facilitating the enrolment:
  - the employee’s name;
  - the employee’s email address;
- if the employee is a registered migration agent – the employee’s Migration Agents Registration Number.

This policy should be checked and updated whenever there is a change in regulations about National Code of Practice for Providers for Education and Training to Overseas Students 2018 Standard 4 or in Department of Home Affairs (Immigration) regulations about activities of education agents, or when existing School policies regarding education agents need to be adapted or strengthened.

## Definitions

- a) **Education Agent** – approximately 75 per cent of overseas students obtain the assistance of an education agent for research, enrolling and applying for a visa in Australia. Education agents will help students to complete the application forms and will deal directly with the education institution on their behalf.
- b) **PRISMS** – The Provider Registration and International Student Management System (PRISMS) is the system used to process information given to the Secretary of Department of Education, Skills and Employment (DESE) by registered providers. Any education agent that has a relationship with a provider must have their details entered and maintained in PRISMS.

## Related documents

- **Legislation**
  - [Department of Home Affairs](#)
  - [Migration Act 1958](#)
  - [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) – Standard 4
  - [Australian International Education and Training Agent Code of Ethics](#) – Standard 4.3.4
- **St Hilda's School**
  - Education Agent Listing (available on the [School website](#))
- **Anglican Schools Commission**
  - [Creating Environments for Students to Thrive](#)

## Resource

The School will ensure that there are adequate resources (financial, skill and time) to ensure compliance with the legislative environment.

## The School Council

The School Council will ensure that it is focused on the development of key policies that will enable clear implementation of this policy. Resources will be available for the Principal to develop programs. The School Council ensures there are policies to support the needs of all students who are part of the school community.

## The Principal

This policy will be implemented after approval of the School Council. The Principal will be responsible for the leading of a respectful and inclusive culture, the ongoing professional development of staff and the dissemination of Anglican Church and government materials to meet the objectives of the policy. The Principal will report to the School Council on the operations of the policy and the needs that may emerge from appropriate evaluation. The Principal will ensure programs fall within budget guidelines.

## Evaluation

A continual review will be conducted and reviewed for breaches of compliance and in line with current legislative requirements. Appropriate training, processes and practices will be developed or modified to meet the review conclusions.

## Policy Management

The School may, from time to time, review and update this document to take account of new laws and technology, changes to the School's operations and practices and to make sure it remains appropriate to the changing school environment.

## Document Control

Version	Description	Date
V1.0	Document created, followed by biennial updates.	2015 (created) 14/12/2021 (last updated V1.0)
V2.0	Document formatted in new policy template and updated. Added content to Purpose section. Updated links in Related Documents and Distribution Checklist details.	25/09/2023 26/09/2023 20/12/2023

## Distribution Checklist

No.	Recipient	Responsible	✓
1	Document location: T:\Policies and Procedures\7. CRICOS	EA to the Deputy Principal – Head of Senior School	✓
2	Staff Portal – PDF format, all St Hilda’s staff access	Payroll & Compliance Officer <a href="mailto:compliance@sthildas.qld.edu.au">compliance@sthildas.qld.edu.au</a>	✓
3	St Hilda’s School website <a href="http://sthildas.qld.edu.au">sthildas.qld.edu.au</a>	St Hilda’s School marketing team <a href="mailto:marketing@sthildas.qld.edu.au">marketing@sthildas.qld.edu.au</a>	✓
4	Printed form: <ul style="list-style-type: none"><li>Principal’s office</li></ul>	EA to the Deputy Principal – Head of Senior School	✓