



# Education Agents Policy

## *International Student Program*

### Statement

Ipswich Girls' Grammar School including Ipswich Junior Grammar School (the School) will consider enrolment applications from students wishing to apply for a Student Visa, subject to compliance with minimum requirements and conditions set by the School, and with legislative requirements of the State of Queensland and the Commonwealth of Australia, including any requirements to undertake extra tuition in the English language in order to demonstrate the English language proficiency standard needed to enter mainstream classes.

A copy of this policy is located on the School's website at:

<https://iggs.qld.edu.au/why-iggs/international/International-agents/>

### Scope

This policy applies to school staff, agents, international students and their parents/legal guardians.

### Responsibility

The Principal has the primary responsibility for this policy.

The following staff are responsible for ensuring compliance with this policy:

- Manager of International Exchanges & Marketing
- Enrolments Registrar

### Introduction

Ipswich Girls' Grammar School including Ipswich Junior Grammar School (the School) is committed to ensuring its Education Agents act ethically, honestly and in the best interest of overseas students and uphold the reputation of Australia's international education sector. The engagement of Education Agents must comply with the Education Services for Overseas Students Act 2000 (ESOS Act) and the requirements of the National Code of Practice for Providers of Education and Training to Overseas Students (the National Code).

Further information is available for agents at:

- <http://education.gov.au/privacy>
- <https://internationaleducation.gov.au/Regulatory-Information/Pages/Education-Agents.aspx>
- <https://internationaleducation.gov.au/Regulatory-Information/Pages/Education-Agents-FAQ.aspx> .

### Education Agents

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

The education agent agrees to comply with the requirements of Standard 4 in the 2018 National Code, including:

- declaring in writing and taking reasonable steps to avoid conflicts of interests with any duties as an education agent representing *The 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 School monitoring activities and corrective and preventative action, and understands the grounds for termination of agreement as outlined in Standard 4.4 of the 2018 National Code
- 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 School practices due diligence by requiring its agents to have an appropriate knowledge and understanding of the overseas education system in Australia, including the Australian International Education and Training Agent Code of Ethics, requesting comprehensive information about the agency (including up-to-date and accurate marketing information) via the 'Education Agent Application' form and references from reputable sources. In addition, the School regularly monitors the performance and activities of all Education Agents on an ongoing basis, to ensure that they continue to act ethically, honestly and in the best interest of overseas students.

Education Agents engaged by the School will have their details entered into the Provider Registration and International Student Management System (PRISMS) and will enter into a written agreement outlining:

- the School's responsibilities, including legislative compliance;
- the requirements of the agent in representing the School;
- the School's processes for monitoring the agent's activities and ensuring the agent gives overseas students accurate and up-to-date information;
- the corrective actions that may be taken and the grounds for termination of the written agreement with the agent; and
- the circumstances which information will be shared.

The School may receive a student enrolment application from an education agent on behalf of the parent. 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 NC St 4.

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

Information recorded about education agents includes:

- 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 ph1 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.

## Conflicts of Interest

Education Agents must declare and take all reasonable steps to avoid conflicts of interest with their duties as an education agent of the School and maintain transparency with their activities.

Conflicts of interest may include:

- when the Education Agent charges services fees to both overseas students and registered providers for the same service;
- where an Education Agent has a financial interest in a private education provider; or
- where an employee of an Education Agent has a personal relationship with an employee of the School.

## Australian International Education and Training Agent Code of Ethics

This Code of Ethics is based on the 'London Statement' (Statement of Principles for the Ethical Recruitment of International Students by Education Agents and Consultants). These requirements ensure Education Agents adhere to and practice responsible business ethics, and that they understand their Education Agents Policy obligations to provide current, accurate and honest information to overseas students to help them make informed decisions about study in Australia.

## Education Agent Monitoring

The performance of each Education Agent will be reviewed by the School annually using the 'Monitoring Agent Interactions' form. The School will consider the performance of the Education Agent to decide whether to:

- maintain the Education Agent's appointment;
- appoint the Education Agent for a further period subject to certain conditions; or
- terminate the Education Agent's appointment.
- In considering the Education Agent's performance the School will consider:
  - the Education Agent's compliance with the written agreement or relevant legislation;
  - the number of students the Education Agent has recruited;
  - conversion rates (number of applications, offers and commencements);
  - the academic progress and performance of students recruited by the Education Agent;
  - any feedback or information from students or third parties regarding the Education Agent;
  - the quality, accuracy and currency of information and advice provided by the Education Agent to students; and
  - the quality of the appointment as assessed by the School.

## Termination of an Education Agent's Appointment

The School may terminate an Education Agent's appointment where the School knows or has a reasonable suspicion that the agent may have been engaged in unprofessional conduct. The School maintains the right to ban any agent activity that in the School's opinion is not compliant with:

- the written agreement; or
- any relevant legislation; or
- any information provided to the agent by the School.

The 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

## Immediate corrective actions

The School will take immediate corrective action if it believes the Education Agent is in breach of Standard 4 of the National Code. This corrective action will adhere to the principles of 'Natural Justice' and corrective actions may include:

- providing the Education Agent with additional information; or
- providing targeted training to the Education Agent regarding obligations and expectations; or
- warning the Education Agent; or
- suspending the Education Agent's appointment; or
- maintaining the Education Agent's appointment subject to certain conditions; or
- Education Agents Policy
- terminating the Education Agent's appointment immediately
- If the School becomes aware or has a reasonable suspicion that an Education Agent is engaging in false or misleading recruitment practices, it will immediately terminate their relationship with the Education Agent and notify the Department of Home Affairs.

## Privacy

Personal information that may be obtained, stored and released is done so in accordance with the Privacy Act 1988. For further information please refer to the School's Privacy Procedure.

<b>Approved By:</b> Dr Marie Perry Principal	<b>Date:</b> 16 January 2023
<b>Maintained By:</b> Enrolments Registrar	<b>Date:</b> 16 January 2023
<b>Policy Review:</b> Enrolments Registrar	<b>Date:</b> 16 January 2024