

Agent Management Policy

Policy Category	Corporate		
Policy Owner	General Manager IGI		
Responsible for Implementation	General Manager IGI		
Review Date (2 years)	October 2025		
Relevant to	IGI Staff		
Related Documents	Admissions Policy and Procedure Agent Management Procedure Agent Agreement Agent Application Form Agent Performance Review Form Agent Reference Check Form Credit for Prior Learning Policy and Procedure Enrolment Terms and Conditions Refunds Policy and Procedure		
Version	Authorised by	Approval Date	Effective date
1.2	Governing Board	6 Oct 2023	6 Oct 2023

1. Purpose

This purpose of this Policy is to ensure that PBL Education Pty Ltd trading as International Graduate Institute (IGI) has appropriate written agreements with each education agent it engages and that it has and implements appropriate policies and procedures to ensure each such agent complies with all legislative and regulatory requirements.

2. Definitions

In the context of this document, the following definitions apply:

Definitions	
Agent Agreement	Agreement between an education agent and IGI, including the schedules.
Agent Code of Ethics	Means the Australian International Education and Training Agent Code of Ethics, a set of standards specific to Australia's Education Agents mirroring the requirements for education providers under the ESOS Framework.
CoE (Confirmation of Enrolment)	A document issued by a registered provider to intending overseas students and which must accompany their application for a student visa. It confirms the overseas student's eligibility to enrol in the particular course of the registered provider. They are sometimes called eCoE (Electronic CoE).
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students, that lists all Australian education providers that offer courses to people studying in Australia on student visas and the courses offered.
ESOS Framework	The legal framework that sets out the requirements for registration as an ESOS provider and defines the standards that must be met by providers offering courses to overseas students.
IGI	PBL Education Pty Ltd trading as International Graduate Institute (IGI)

Definitions	
IGI Education Agent (or IGI Agent)	A person or organisation (in or outside Australia) who has a written agreement with IGI to recruit overseas students and to refer them to IGI. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to IGI.
International student/ Overseas student	A student who is not a domestic student and who may hold a student visa and is protected by the Education Services for Overseas Students Act 2000.
Marketing Collateral	Any print or digital materials that promote enrolment in a course of study, including but not necessarily limited to brochures, flyers, promotional posters, website content, promotional emails
National Code	The National Code of Practice for Providers of Education and Training to Overseas Students 2018. Sets out standards for the conduct of registered providers and governs the protection of and the delivery of courses to overseas students.
PRISMS	The system used to process information given to the Department of Education by registered providers concerning an overseas student's course enrolment. It is used by providers to issue/amend CoEs, extract reports on student visas etc.
Student Recruitment Collateral	Any print or digital materials that enable enrolment in a course of study including but not necessarily limited to Application Forms, Letters of Offer/Written Agreement, Student Invoice, and Terms and Conditions of Enrolment.

3. Scope

This Policy applies to all activities related to IGI Education Agents, and performed on behalf of IGI by those Agents, and to any individuals and/or organisations employed or contracted by those Agents.

This document exists in the context of all related IGI marketing, recruitment and enrolment policies and should be read together with those documents. Matters specific to policies and procedures relating to those related areas are dealt with in their respective policy documents.

4. Policy Principles

- 4.1. When recruiting overseas students, either directly or via Education Agents or other third-party organisations, IGI prioritises protecting the rights of overseas students and protecting the reputation of IGI and the Australian international education industry.
- 4.2. IGI is committed to ensuring its engagement with Agents is ethical and in accordance with all legislative and regulatory requirements that govern IGI and its operations.
- 4.3. This Policy exists in the context of the IGI marketing, recruitment and enrolment policies and procedures, which ensure that:
 - Before their enrolment in any IGI course, prospective students are provided with clear, accurate, comprehensive information readily available in plain English to support them in making well-informed decisions on their future studies.
 - Appropriate processes have been followed, and data collected.
- 4.4. IGI will enter into a written agreement with each Agent it engages, ensuring written agreements are maintained current and compliant with all applicable regulatory and legislative requirements.
- 4.5. IGI will enter and update the agent details in PRISMS as required. IGI will ensure that appropriate records of its engagement with Agents are maintained.

- 4.6. IGI will ensure that the Agents it engages are aware of their obligations; act honestly, in good faith, and in the best interests of students; declare and/or avoid conflicts of interest; and observe appropriate confidentiality and transparency in their dealings with students.
- 4.7. All engagement with Agents will involve ongoing oversight to ensure compliance with this Policy and all legislative and regulatory requirements.
- 4.8. IGI will actively monitor its Agents' activities. Where an agent is reasonably believed to have engaged in fraudulent or misleading practices, IGI will terminate its relationship with that agent or ensure that the agent immediately terminates its relationship with the employee or contractor implicated in the matter.
- 4.9. IGI will not accept students from Agents where it is known or reasonably suspected that the agent has:
 - a. Provided migration advice without being authorised to do so under the Migration Act
 - b. Engaged in dishonest or unethical recruitment practices
 - c. Deliberately attempted to recruit a student in contravention of the requirements set out in Standard 7 of the National Code
 - d. Facilitated the enrolment, including via the creation of a CoE, of a student whom the agent believes will not comply with the conditions of their visa.

5. Responsibilities

- The General Manager IGI is the owner of this policy and is responsible for the implementation of this policy.
- The IGI staff representatives involved in managing Agents are responsible for being aware of and complying with this Policy.

6. References

- Higher Education Standards Framework (Threshold Standards) 2021
- Education Services for Overseas Students Act 2000 (Cth)
- Education Services for Overseas Students Regulations 2019
- The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (The National Code)
- Tertiary Education Quality and Standards (TEQSA) Act 2011 (Cth)
- Australian International Education and Training Agent Code of Ethics
- TEQSA Sector alert: Provider responsibilities when using Education Agents

7. Document History

Version	Date	Author	Reason	Sections
1.0	Jun 2022	PBL Education	New policy	All
1.1	Oct 2023	IGI	Rebrand and review	All
1.2	Jun 2025	IGI	Logo update; minor amendments to Definitions for additional clarity; roles and responsibilities updated.	2, 5