

Agent Management Procedure

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 Policy 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 Procedure describes the processes implemented by PBL Education Pty Ltd trading as International Graduate Institute (IGI), regarding all aspects of managing Education Agents.

This purpose of this procedure is to ensure that 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 Procedure applies to all activities related to IGI Education Agents and performed on behalf of IGI by those Agents and 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. Procedures

4.1. Agent appointment

- 4.1.1. Education Agents interested in becoming IGI agent representatives must complete and submit the Agent Application Form and provide certified copies of proof of business and supporting evidence as indicated on the form.
- 4.1.2. IGI staff representative will assess the application and information available, to determine if the education agent is suitable to be appointed. The assessment will consider the information provided in the application, available PRISMS data, the agent's website and social media accounts and other information available to ascertain the agent's past and current practices, reputation, ethics, performance and level of professionalism.
- 4.1.3. The assessment will include conducting reference checks. Education Agents are required to provide on their application form the details of two referees, at least one from Australian tertiary providers. The referees will be emailed the Agent Reference Check Form, which they must complete, sign and return to the IGI staff representative via email. If a referee is not contactable or does not complete and return the form, the education agent will be contacted and required to provide details of another referee.
- 4.1.4. Based on the information and documentation available, upon completion of the assessment and reference check the IGI staff representative will make a recommendation to the General

Manager IGI (or delegate) regarding the suitability of the appointment. The General Manager IGI (or delegate) will decide to approve or reject the appointment. Where the applicant has been assessed as suitable for appointment, the agent agreement will be prepared and forwarded for signing by the two parties. The term of the agreement is one year for new Education Agents. Where the agent's application has been rejected, the agent will be notified in writing of the outcome.

- 4.1.5. Where it is found that the application contains false or misleading information, the application will be rejected and no applications from the education agent will be accepted in the future.
- 4.1.6. IGI will not partner with or accept students from an education agent if it knows or reasonably suspects the agent to be:
 - a. providing migration advice unless that agent is authorised under the Migration Act
 - b. engaged in, or to have previously engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where this conflicts with the obligations of registered providers under Standard 7 (Overseas student transfers)
 - c. facilitating the enrolment of a student whom the agent believes will not comply with the conditions of their visa
 - d. using PRISMS to create CoEs for other than bona fide students.
- 4.1.7. When a new agent is appointed, and the existing agent agreement template is updated, those involved will first review the contents of this policy and the steps of this procedure to confirm that they understand them and will adhere to them.
- 4.1.8. When a written agreement between IGI and an Agent is established, updated or renewed, those developing and finalising it will ensure that it has covered all requirements of the National Code Standard 4, including, but not necessarily limited to ensuring it addresses:
 - a. IGI responsibilities as set out in the ESOS Framework and other regulatory standards
 - b. the processes IGI will follow in monitoring the Agent's activities
 - c. the processes IGI will follow in providing the Agent with up-to-date information
 - d. the obligations of the Agent, including but not limited to:
 - declaring in writing and avoiding conflicts of interests
 - observing appropriate confidentiality and transparency in dealing with students
 - acting honestly, in good faith and the best interests of the student
 - maintaining appropriate knowledge of international education in Australia, including the Australian International Education and Training Agent Code of Ethics.
 - e. the corrective action IGI will take if the Agent does not comply with the agreement and IGI policies and procedures, including the requirements set out in National Code
 - f. the grounds for terminating the agreement with the agent as per the National Code and as detailed herein
 - g. the circumstances for disclosure of agent information to Commonwealth and state agencies, including via PRISMS.
- 4.1.9. When a written agreement between IGI and an Agent is established, updated or renewed, the agent must sign the contract to declare that the Agent understands and will adhere to the requirements set out in the contract before engaging in recruitment activities.
- 4.1.10. Each party retains a copy of the signed Education Agent Agreement. IGI staff will add the Agent details to PRISMS and to the list of approved Education Agents published on the IGI website.
- 4.1.11. The Education Agent appointment process is detailed in **Appendix 1**.

4.2. Agent performance monitoring and review

- 4.2.1. Newly appointed IGI Education Agents will be provided with training in the IGI course offering, policies, and ESOS framework. Training will be used to identify areas that require improvement and further training (if any) and refresher sessions will be organized regularly, as required by the changes in courses and/or legislation.
- 4.2.2. The IGI staff representative responsible for managing an Education Agent will ensure consistent and ongoing monitoring of the Agent's operations, including recruitment practices, outcomes of students recruited by the Agent, and any other matters relevant in assessing the Agent's compliance with the written Agreement and with applicable legislative and regulatory requirements.
- 4.2.3. The IGI staff representative responsible for managing an Agent will maintain regular communication and notify them of any updates or changes.
- 4.2.4. The IGI staff representative responsible for managing an Agent will ensure that new staff or contractors engaged by the Agent are made aware of their responsibilities under the agreement and IGI policies.
- 4.2.5. The IGI staff representative responsible for managing an Agent will ensure they are provided with the following:
 - a. up-to-date marketing collateral, student recruitment collateral, or other relevant documents
 - b. details any changes to courses, activities, or policies relevant to the agent's activities
 - c. training and support with understanding and taking any action(s) required.

Marketing collateral developed by an Education Agent on behalf of IGI will be subject to approval by the General Manager IGI (or delegate) before publication and dissemination.

- 4.2.6. A formal agent performance review will be conducted annually, including the review before the Agreement's expiry date (part of the reappointment process as described in this Policy). The annual performance reviews for each Agent will be scheduled around the start date indicated on the respective Education Agent Agreement. The performance review for the Agent reappointment will be initiated at least one month before the Agreement expiry date.
- 4.2.7. The Agent performance review will consider the Education Agent's performance and compliance, including:
 - a. the Education Agent's compliance with the agreement and, if applicable, with any conditions placed by IGI
 - b. the number of students the Education Agent has recruited and the conversion rate of student applications to offers and offers to enrolment
 - c. reasons why prospective student applications did not proceed to enrolment
 - d. whether the students referred by Agents are genuine and engaged in learning
 - e. number of student visa refusals for students recruited by the Agent
 - f. feedback or information from students or third parties regarding the Agent
 - g. the quality, accuracy and currency of the agent's information and advice to students
 - h. the Agent's interactions with the regulator
 - i. the quality of the appointment as assessed by IGI staff
 - j. outcomes of Agent visits and meetings.
- 4.2.8. Following assessment of agent performance IGI will decide whether to:
 - a. maintain/renew the education agent's appointment as applicable, or
 - b. request the Agent to undertake additional training, or
 - c. issue a written warning to the Agent, or
 - d. re-appoint the Agent for a further period subject to certain conditions, or

- e. terminate the Agent's appointment.

4.3. Re-appointment

- 4.3.1. Reappointing existing IGI Education Agents must begin with the agent performance review, as described in this Procedure, at least one month before the current agent agreement expires. The reappointment process is detailed in **Appendix 3**.
- 4.4. The Education Agent will receive the Agent Performance Review Form, which they must complete, sign and return to the IGI staff representative. The Education Agent performance review will be conducted as indicated above at 5.2. and according to the process described in **Appendix 2**.
- 4.4.1. Where following the review issues are being identified, the IGI staff representative will notify the Agent in writing of the required corrective actions.

4.5. Termination

- 4.5.1. The process of terminating an Education Agent's appointment is detailed in **Appendix 4**.
- 4.5.2. Where IGI becomes aware or has reasons to believe that an IGI Education Agent or an employee or subcontractor of that Agent has not complied with the Agent's responsibilities under the National Code, Standards 4.2 and 4.3 and the Agreement, IGI will take immediate corrective action.
- 4.5.3. When the IGI staff representative responsible for managing an Agent becomes aware of agent non-compliance, the matter will be immediately escalated to the General Manager IGI (or delegate). Information regarding agent non-compliance will immediately be investigated, and a warning letter will be issued to the Agent. A written response from the Agent will be required within 10 business days. The following may be considered:
 - a. the nature and reliability of the source of the information
 - b. the seriousness of the non-compliance
 - c. additional information available and the Agent's written response
 - d. communication with any other party informed, involved, implicated, or impacted.

The decision may include maintaining the Education Agent's appointment as applicable, requesting the Agent to undertake additional training, re-appoint the Agent for a further period subject to certain conditions, or terminating the Agent's appointment.
- 4.5.4. Where IGI becomes aware or has reason to believe that an IGI Education Agent or an employee or subcontractor of the Agent is engaging in fraudulent or misleading recruitment practices, IGI will immediately terminate its relationship with the respective Agent or request them to terminate its relationship with the employee or subcontractor who engaged in those practices.

5. Responsibilities

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

6. References

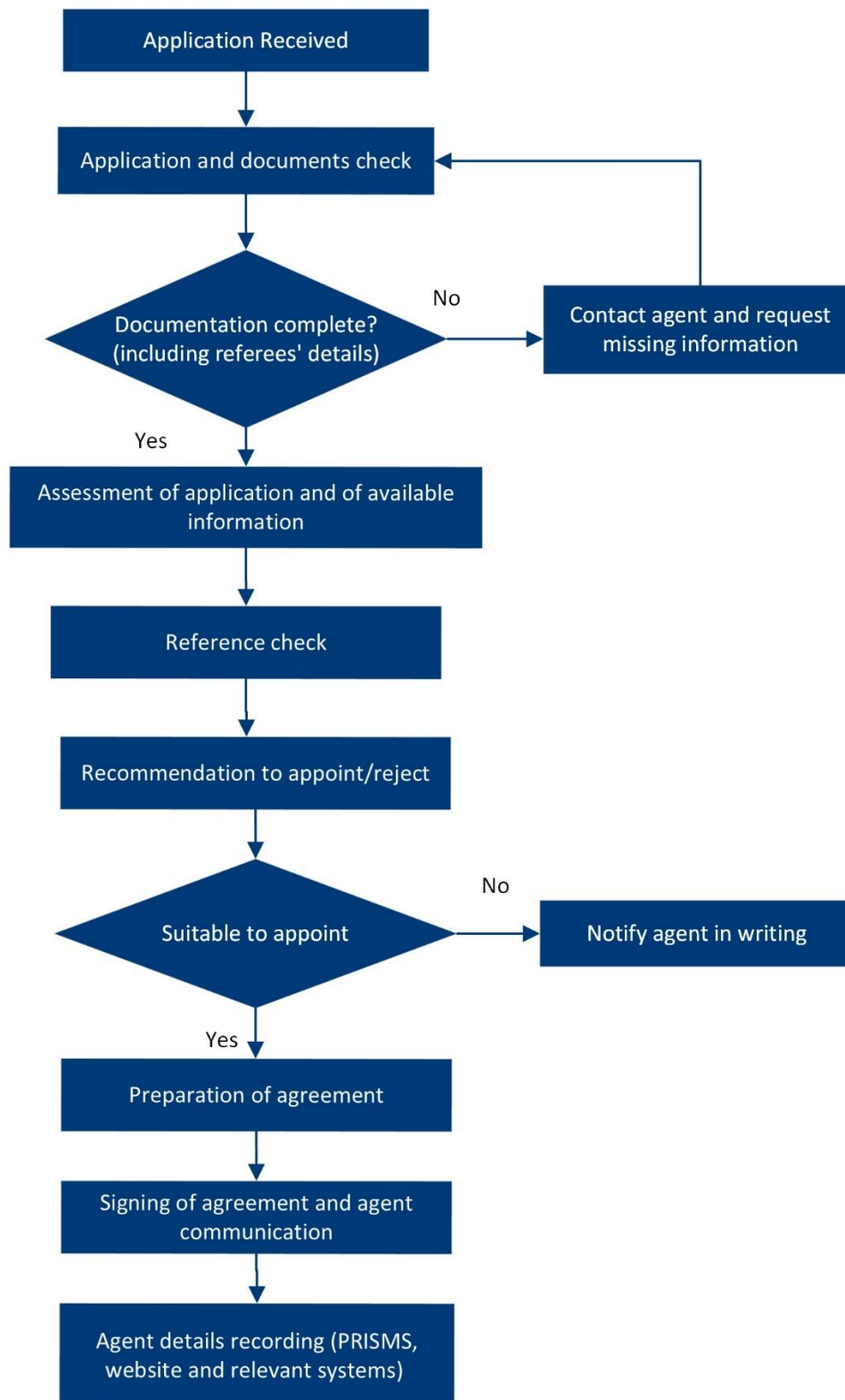
- Higher Education Standards Framework (Threshold Standards) 2021
- Education Services for Overseas Students Act 2000 (Cth)

- 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

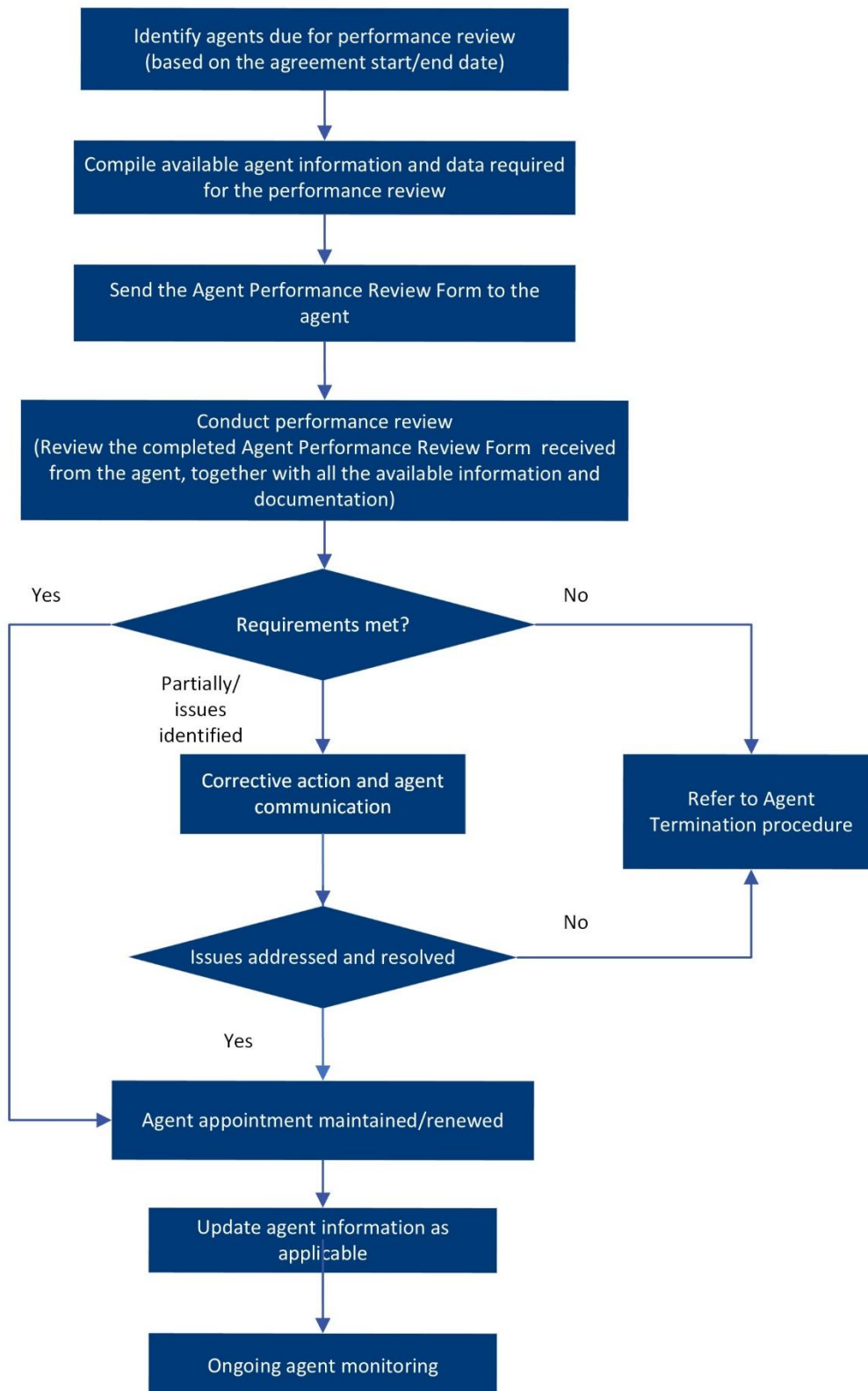
7. Document History

Version	Date	Author	Reason	Sections
1.0	Jun 2022	PBL Education	New policy	All
1.1	Oct 2023	IGI	Rebrand and minor amendments	All
1.2	Jun 2025	IGI	Logo update; minor amendments to Definitions for additional clarity; roles and responsibilities updated.	2, 4, 5

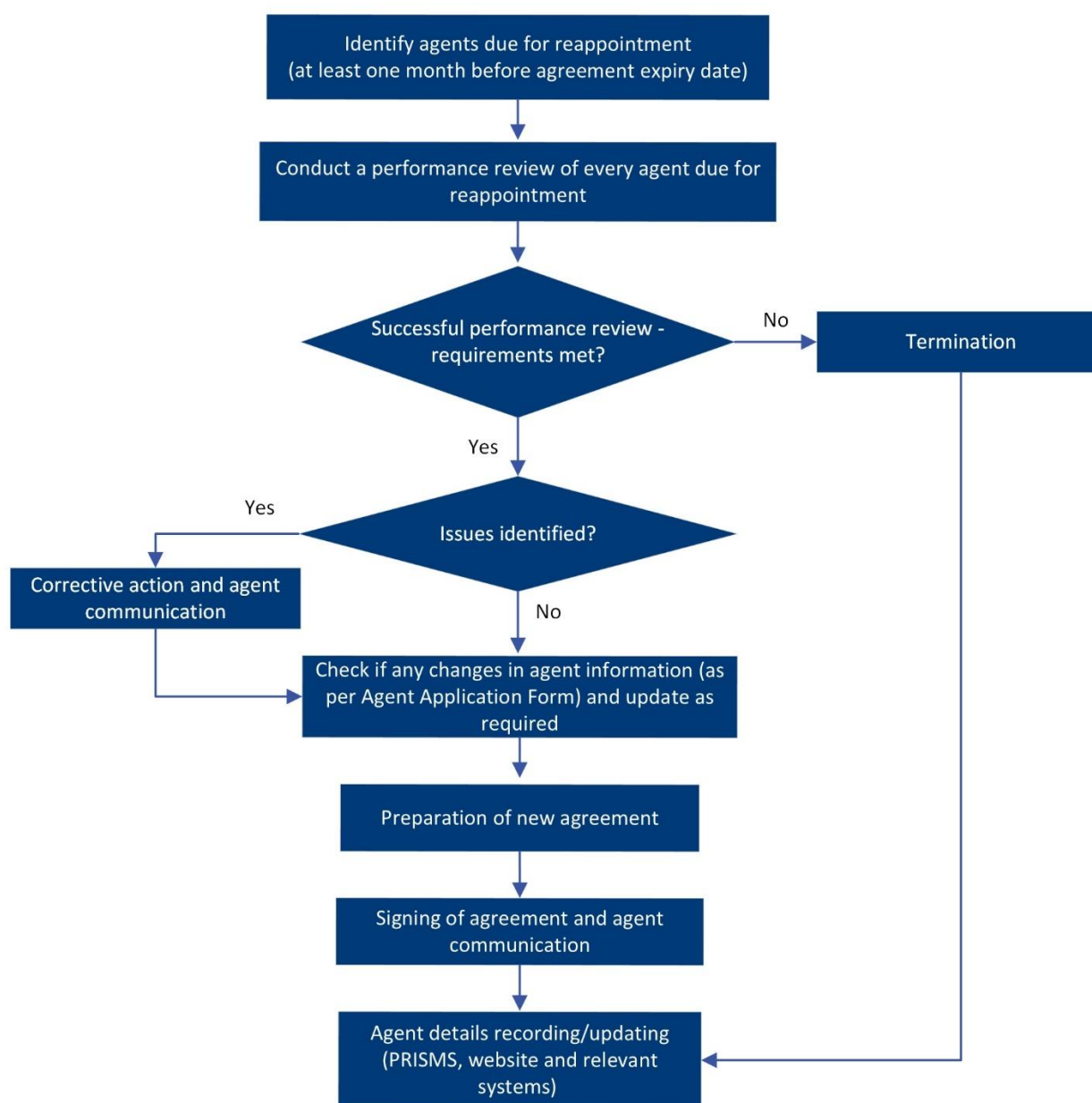
Appendix 1: Agent Appointment process



Appendix 2: Agent performance review process



Appendix 3: Agent Reappointment process



Appendix 4: Termination of the Agent Appointment process

