

Education Agent Policy

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Approved By: Dhyan Singh

1. Purpose

This policy sets out the principles for engaging and monitoring education agents working with and on behalf of Stanley College.

2. Scope

This policy applies to all Education Agents of Stanley College and all staff involved in the recruitment and monitoring of the agents for the College.

3. Key Definitions

Education Agent	A person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers. Education agent does not refer to an education institution with whom an Australian provider has an agreement for the provision of education (that is teaching activities).
ESOS Act	The <i>Education Services for Overseas Students Act 2000</i> of the Commonwealth of Australia.
International Student	A student studying in Australia on a student visa issued by DoHA.
National Code 2018	The National Code of Practice for Providers of Education and Training to Overseas Students 2018, established pursuant to Part 4 of the ESOS Act.
PRISMS	Provider Registration and International Students Management System: the Australian Government database that provides Australian education providers with Confirmation of Enrolment facilities required for compliance with the ESOS legislation.

4. Policy Principles

4.1 Principles

Stanley College will enter into a formal written agreement that governs the appointment of Education Agents engaged to representing Stanley College.

Stanley College engages and manages agents to support its recruitment objectives.

Stanley College will not accept students from an Education Agent if it reasonably suspects that the Education Agent, their employee or sub-contractor has:

- engaged in, or has previously been involved in dishonest practices, including the deliberate attempt to recruit a student where it conflicts with Standard 7 of the National Code 2018;
- facilitated the enrolment of a student who the Education Agent believes will not comply with the student visa conditions;
- provided immigration advice where it is not authorised to do so under the Migration Act.

Stanley College will:

- select only reputable Education Agents;
- manage and monitor its Education Agents to ensure they act with honesty and integrity;
- manage its Education Agents in a professional and responsible manner;
- enter into a written agreement with each Education Agent, as per the *Education Agent Procedure*;
- maintain an accurate list of its Education Agents and enter and maintain the Education Agents' details in PRISMS, ASQANET, Ebecas and the Stanley College website;
- provide information on Education Agents in PRISMS for every student enrolment where an agents employee has facilitated the students' acceptance for enrolment;
- be responsible at all times for compliance with the Tertiary Education Quality and Standard Agency (TEQSA) Act 2011, ESOS Act and National Code 2018;
- provide adequate training and information twice a year for Education Agents, including their obligations under this policy, the written agreement and Australian migration laws;
- monitor the Education Agents' compliance with the written agreement;
- take immediate corrective action if it becomes aware that the Education Agent, or its subcontractor, has not complied with the responsibilities outlined in the written agreement;
- terminate the written agreement if it becomes aware, or has reason to believe, the Education Agent is engaging in false or misleading recruitment practices; and
- take responsibility for the creation of all Confirmation of Enrolment (CoE) for students.

(Note: Education Agents are not permitted to create CoEs on behalf of Stanley College and not provided with access to PRISMS.)

With specific reference to marketing and advertisements, Stanley College will:

- Ensure any advertisements or marketing materials published or disseminated by the Education Agent to prospective international students;
 - include Stanley Colleges registration code or a link to the part of the National Register where Stanley Colleges registration code is located;
 - where the advertisements or marketing materials refer to the Stanley Colleges services, they must be accurately represented, including by distinguishing the types of training and assessment that will result in the issuance of AQF certification documentation from any other training and assessment delivered;
 - include accurate information regarding any financial support arrangements available in respect of the services referred to in the advertisements or marketing materials;
 - do not refer to or imply a connection with another person unless the consent of that person has been obtained;
 - include the code and title of the training product as published on the National Register;
 - accurately represent the training products on the organisation's scope of registration;
 - only refer to a training product that is no longer current while it remains on the organisation's scope of registration and new enrolments are permitted; and
 - only represent that completion of a training product will lead to a licensed or regulated outcome where this has been confirmed by the relevant industry regulator.

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- Ensure that where Education Agent advertisements or marketing materials refer to services Stanley College has engaged it to deliver – the marketing materials must clearly articulate that the service provided is the recruitment of prospective VET students on behalf of Stanley College only.

5. Roles and Responsibilities

- **International Recruitment Manager:** Oversee the management of Education Agents at Stanley College and ensure compliance. Responsible for orchestrating all monitoring actions and associated actions/reporting.
- **Vice President Business Development:** Oversee the management of Education Agents at Stanley College and ensure compliance.
- **Compliance Team:** Responsible for monitoring processes and ensuring compliance.
- **International Recruitment Officers:** Responsible for processing of onboarding and offboarding Education Agents, education agent agreement processing, training, application of monitoring requirements and day to day administration.

6. Policy Information

Policy Area	VET / HE
Authorised Officer	Vice President Business Development
Supporting documents, procedures, work guidelines and forms	Education Agent Procedure Marketing Procedure (VET & ELICOS) Agent Agreement Guidelines for use of PRISMS
Audience	Public

7. Compliance Monitoring Summary

Overview	Frequency
Biannual Agent performance and activity review/monitoring, every six months. Summary report and recommendations for training or corrective actions to be submitted from the International Recruitment Manager to the Vice President Business Development for approval and action.	Biannually (June/ December)
Annual marketing material issuance and declaration collection. Each year new marketing materials will be issued to all Education Agents following annual updates. The international recruitment team will collect a declaration from all registered Education Agents confirming compliance.	January-February annually
Annual Marketing Material Review – Education Agents. The international recruitment team will complete a compliance check of a representative ‘sample’ of its education agents. Summary report to be submitted from the International Recruitment Manager to the Vice President Business Development and then Compliance Team.	April annually
Superseded and Removed Courses Monthly Audit. Monthly check completed by the Compliance Team, including Education Agent websites. Communicated to International Recruitment for action.	Monthly
Education Agent Platform Audit. Stanley College audits Education Agents’ details across the five platforms detailed in the Education Agent Procedure, every six months. Summary report to be submitted from the International Recruitment Manager to the Compliance Team.	Biannually (May/ November)

8. Link to Standards

8.1 Standards for RTOs 2025

Quality Area	Outcome Standard	Focus Area	Standard	Performance Indicator
VET Student Support	VET students are treated fairly and are properly informed, supported and protected.	Information	Standard 2.1	(a)
Governance	Effective governance and a commitment to continuous improvement supports the quality and integrity of VET delivery.	Leadership and accountability	Standard 4.2	(c) (d)

Compliance Requirements / Credential Policy	Standards
Compliance Requirements	7. Marketing and Advertising: Standards 1 (a-d), 2 (a-d) and 3 (a-b) 17. Third Party Arrangements: Standards 1 (a-e), 2 (a-b)

8.2 National Code of Practice 2018

Standard (Number)	Standard (Descriptor)	Standards (Individual)
Standard 4	Education agents	4.1, 4.2, 4.3, 4.4, 4.5, 4.6