PIONEER COLLEGE
RTO: 45763 CRICOS: 03956A

Education Agent

Policy and Associated Procedures

July 2026

Pioneer Education Institute Pty Ltd t/a Pioneer College

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1. Purpose and Scope

1.1 This policy and associated procedures have been developed to ensure that Pioneer College (hereafter, referred to as 'Pioneer') has processes in place to ensure that education agents act honestly and in the best interests of overseas students, as well as uphold the reputation of Australia's international education sector.

1.1.1 This policy and associated procedures meet the requirements of Standard 2.1 of the Outcome Standards for RTOs and marketing and advertising requirements in Compliance Requirements, as well as the National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standard 4.

1.1.2 The objective of this policy is to ensure Pioneer supports high-quality and ethical recruitment practices and maintains compliant with all education agent matters, in regards to both onshore and offshore governance.

1.1.3 This policy applies to all staff involved in Education Agent engagement, monitoring and oversight.

1.1.4 This policy works to align Pioneer with the national ban on onshore transfer commissions and prevent unethical agent practices, through ensuring the protection of registration and quality record keeping practices.

2. Related Documents

Education Agent Agreement and Declaration

Education Agent Register

Agent Application Form

Student Handbook

Marketing Policy and Associated Procedures

3. Related Legislation

3.1 *Education Services for Overseas Students (ESOS) Act 2000*, specifically the *National Code 2018*

3.2 *National Vocational Education and Training Regulator (NVR) Act 2011*, specifically the *2025 Standards for Registered Training Organisations (RTOs) and 2025-2026 integrity reforms.*

This policy and associated procedures will contribute to Pioneer complying with other requirements such as included in the:

- *ELICOS Standards 2018*
- *Equal Opportunity Act 1984 (WA)*
- *Privacy Act 1988*

4. Definitions

Education Agent	An entity (onshore or offshore) that engages in one or more of the following activities in relation to a Provider: • The recruitment of overseas students, or intending overseas students; • Providing information, advice or assistance to overseas students, or intending • Overseas students, in relation to enrolment; • Otherwise dealing with overseas students, or intending overseas students; and • is not a permanent full-time or part-time officer or employee of the provider **Onshore Education Agent:** Agent operating inside Australia; not permitted to recruit transferring students to Pioneer and not eligible for any commission in this relation. **Offshore Education Agent:** Agent located outside Australia; not permitted to recruit transferring students to Pioneer and not eligible for any commission in this relation. **Sub-Agent:** Any agent engaged by the primary agent; must be declared and follow Pioneer requirements.
Education Agent Commission	Education Agent Commission means any monetary or non-monetary benefit, including but not limited to fees, bonuses, gifts, discounts, incentives or rewards, given by or on behalf of the Provider to the Education Agent or an associate, in connection with: a) recruitment of overseas or intending overseas students; b) providing information, advice or assistance about enrolment; or c) otherwise dealing with overseas or intending overseas students.
Overseas Student / Intending Overseas Student	A person who holds, or intends to apply for, a student visa for study in Australia.

5. Policy Statements

5.1 Overview

5.1.1 Pioneer will not accept students from an education agent if it knows or reasonably suspects the education agent to be:

5.1.1.1 Providing migration advice, unless that education agent is authorised to do so under the Migration Act.

5.1.1.2 Engaged in, or to have previously engaged in, dishonest recruitment practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Overseas student transfers).

5.1.1.3 Facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her visa, and/or

5.1.1.4 Using PRISMS to create CoEs for other than bona fide students.

5.2 Education Agent Agreements

5.2.1 All education agents representing Pioneer must sign and abide by Pioneer's Education Agent Agreement and Declaration.

5.2.2 Pioneer's Education Agent Agreement and Declaration meet the requirements of the National Code including:

5.2.2.1 Responsibilities of Pioneer, including that Pioneer is responsible at all times for compliance with the ESOS Act[1] and National Code 2018[2].

5.2.2.2 Pioneer requirements of the agent in representing it including:

a) Declaring in writing and taking reasonable steps to avoid conflicts of interests with its duties as an education agent of the registered provider.

b) Observing appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students.

c) Acting honestly and in good faith, and in the best interests of the student.

d) Having appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.

5.2.2.3 Pioneer's processes for monitoring the activities of the education agent in representing the provider and ensuring the education agent is giving students accurate and up-to-date information on the registered provider's services.

5.2.2.4 The corrective action that may be taken by Pioneer if the education agent does not comply with its obligations under the written agreement, including providing for corrective action outlined in Standard 4.4

5.2.2.5 Grounds for termination of Pioneer's written agreement with the education agent, including providing for termination in the circumstances outlined in Standard 4.5

5.2.2.6 The circumstances under which information about the education agent may be disclosed by the registered provider and the Commonwealth or state or territory agencies.

[1] Education Services for Overseas Student Act 2000 (https://www.legislation.gov.au/C2004A00757/latest/text)

[2] National Code of Practice for Providers of Education and Training to Overseas Students 2018 (https://www.legislation.gov.au/F2017L01182/latest/text)

5.3 Monitoring and Corrective Action

5.3.1 Pioneer will monitor all education agents using the monitoring processes described in the agreement.

5.3.2 Pioneer will take immediate corrective action where Pioneer becomes aware that, or has reason to believe, the education agent or an employee or subcontractor of that education agent has not complied with the education agent's responsibilities as outlined above.

5.4 Termination

5.4.1 Pioneer will immediately terminate its relationship with the education agent, or require the education agent to terminate its relationship with the employee or subcontractor who engaged in those practices, where Pioneer becomes aware, or has reason to believe that the education agent or an employee or subcontractor of the education agent is engaging in false or misleading recruitment practices.

5.5 Education Agent Commissions

5.5.1 Pioneer acknowledges its obligations under the ESOS Act to ensure that Education Agent arrangements are lawful, transparent and in compliance with the national ban on onshore transfer commissions.

5.5.2 Pioneer ensures that commissions and bonuses (if any) are paid only after the student completes the census period of one (1) term. This includes:

5.5.2.1 No upfront commissions

5.5.2.2 No non-monetary incentives.

5.5.2.3 No commissions for onshore transferring students.

5.5.3 Pioneer ensures that all or any arrangements are documented and clearly defined.

6. Procedures

6.1 Process Education Agent Applications

6.1.1 Provide an Education Agent Application form to education agent.

6.1.2 On receipt of an application, check that the application form has been completed in full and that any supporting information has been provided.

6.1.3 Send an acknowledgement that the application form has been received within 3 working days of the receipt of the application. Request additional information not provided, as relevant.

6.1.4 Review information included in application form.

6.1.5 Call referees for reports on the agents.

6.1.6 Approve the agent's application where the agent has demonstrated experience and skills, provides services that align with Pioneer's marketing objectives and positive reports from referees are received.

6.1.7 For successful agents, customise the Education Agent Agreement and send to the agent for signing. This must be within 10 working days of receiving the application.

6.1.8 Where the agent is not deemed to be suitable, send an email within 10 working days of receiving the application advising that their application has not been successful and including the reasons why.

6.2 Manage Education Agents

6.2.1 Following the signing of the agreement, add the agent details to PRISMS following the *How to manage agent details* in PRISMS information.

6.2.2 Following the signing of the agreement, advise ASQA via ASQAnet and within 30 days of the agreement being entered into or prior to the obligations under the agreement taking effective, whichever occurs first.

6.2.3 Add the agent details to list of agents on website.

6.2.4 File all signed education agent agreements.

6.2.5 Contact the agent to provide an induction, including an overview of Pioneer, requirements and marketing and recruitment processes.

6.2.6 Provide the education agent with current copies of marketing materials and enrolment forms.

6.3 Monitor Education Agents

6.3.1 Regularly update education agents with details of new courses and any updated marketing and enrolment materials/processes.

6.3.2 Monitor agents every six months using the Education Agent Monitoring Form.

6.3.3 Where the Education Agent Monitoring Form or feedback from students indicates that the Education Agent may not be meeting the terms of their agreement, immediately investigate the issue.

6.3.4 Where the investigation confirms that the provider has not complied with their responsibilities as per the Education Agent Agreement (except in the case of where the education agent has engaged in false or misleading practices – see the following section), contact the education agent in writing to advise to corrective actions that are required.

6.3.5 Implement relevant corrective actions.

6.3.6 Monitor corrective actions as required to ensure they are implemented.

6.3.7 File all documentation associated with monitoring.

6.4 Terminate Education Agent Agreements

6.4.1 Where education agent monitoring or any other intelligence demonstrates that the education agent has engaged in false or misleading practices, immediately send a notice in writing to the agent advising them that their agreement is terminated and giving the reasons why.

6.4.2 Remove the agent details from website.

6.4.3 Remove the agent details from PRISMS following the How to manage agent details in PRISMS information.

6.4.4 Advise ASQA via ASQAnet of termination of the agreement and within 30 days of the agreement ending.

7. Policy Review

7.1 Policy review is undertaken by the CEO with input from relevant staff.

7.2 Policy reviews are identified by an annual review cycle, or through audit and continuous improvement activities. An earlier review may occur if legislative or regulatory changes occur, or if a significant incident or near miss occurs.

7.3 The CEO actions the changes and updates the policies and associated procedures manual accordingly.

7.4 The CEO communicates amendments to policies and associated procedures to all relevant staff via email and/ or staff meetings.

7.5 Changes will be recorded in the updated version control and Document History.

8. Responsibilities

8.1 The CEO/ PEO is responsible for, but not limited to:

8.1.1 Ensuring appropriate record management and documentation is in place for a retention period of 7 years.

8.1.2 Maintaining accurate documentation for internal and external audits.

8.1.3 Protecting the CRICOS registration and reputation of Pioneer.

8.1.4 Ensuring all agreements are in practice with organisational values and regulatory expectations.

8.2 The Marketing Department are responsible for, but not limited to:

8.2.1 Managing day to day relations with Education Agents, including communication of terms.

8.2.2 Monitoring Education Agent recruitment practices and ensuring correct data entry into the register for documentation accuracy.

8.2.3 Escalating concerns to senior management as/ if they arise.

8.2.4 Ensuring marketing material used by Education Agents are approved and current, and not misleading.

8.2.5 Assessing and approving education agent applications.

8.2.6 Managing education agent applications.

8.2.7 Monitoring and terminating education agent agreements.

8.3 The Compliance Team is responsible for, but not limited to:

8.3.1 Monitoring the arrangements via liaison with the relevant staff and initiating investigations where required.

8.5 Education Agents are responsible for, but not limited to:

8.5.1 Complying with all terms written in their signed agreement, including commission conditions.

8.5.2 Providing accurate, complete and transparent information to prospective students.

8.5.3 Complying with Pioneers Policies and Procedures.

Any complaints or breaches in relation to this document should be reported to the Chief Executive Officer in person or by email to: ceo@pioneercollege.edu.au

Document History:

Version No.	Issue date	Nature of Amendment	Approved By
1.0	1 Jul 2025	*As per implementation of the Revised 2025 Standards for RTOs, all related documentation is reset to version 1.0 to reflect alignment with the updated regulatory framework.* Creation of Document.	CEO
1.1	23 Oct 2025	Document edited.	CEO
1.2	7 Dec 2025	Updates to definitions according to new legislation. New section added.	CEO
1.3	16 Dec 2025	Minor formatting changes. Elaborated on responsibilities and section 1.	CEO
1.4	15 Jul 2026	Review completed. Amendments to responsibilities section. Minor formatting corrections. Footnotes added.	CEO

Document Code	EDA-PP001-150726
File Location	https://www.dropbox.com/scl/fo/s35dv9ddwfrrzgnom3ltg/ADZplj4w2Lv6kMNkExcDkN4?rlkey=65ra355s1ilhxfmuyt20pngiu&st=23w3ionp&dl=0