



International Education Association of Australia agent quality research

February 2026

Prepared for



Contents

Executive summary	4
Key findings	5
Policy options – Agent quality models	7
Recommendations	10
Moving toward implementation	10
Purpose and background	11
Project process	11
What this report covers	11
Part A – Literature review and desktop analysis	12
Accreditation models	17
Cross-sector comparators	33
Migration agents in Australia	33
Travel agents in Australia	34
Financial advisers and mortgage brokers	34
Additional observations	35
Part B – Consultation and stakeholder engagement in Australia and globally	37
Stakeholder consultations	37
Consultations with global bodies	40
Insights and lessons learned	40
Agent Reference Group	42
Part C – Policy options and evaluation	48
Conclusion	62
Appendix A	63
Appendix B	65



The Project Team



Sharyn Martin
Senior Partner



Thomas Eastwood
Senior Consultant



Chris Davis
Senior Consultant



Mark Pettitt
CEO

Executive summary

Commissioned by the International Education Association of Australia (IEAA) in November 2025, this report responds to growing sector and government focus on strengthening integrity and accountability across Australia's international education system. Australia operates within one of the most mature and comprehensive regulatory environments globally. However, recent integrity concerns—particularly involving a small proportion of agents and providers—have demonstrated that regulation alone is insufficient when enforcement is inconsistent and system gaps can be exploited. A proportionate, evidence-based response requires greater visibility of the scale of the issue, combined with practical reforms that protect students, strengthen integrity, and reinforce Australia's reputation as a trusted study destination.

Recent policy changes such as the onshore transfer commission ban and updates to the fit and proper provider requirements strongly signal the current Government's intention to act on integrity measures that it sees as threatening Australia's reputation as a quality study destination. There is therefore no time to waste in putting forward a practical, sector-led solution that can be implemented quickly, demonstrate early impact, and inform future government settings.

This report brings together a broad program of work comprising a desktop review of international agent quality frameworks and relevant models from adjacent sectors (including finance, tourism and migration), extensive consultations with Australian peak bodies, Austrade, education providers, regulators, the IEAA Agent Reference Group, and targeted discussions with global organisations such as the British Council, Education New Zealand and AIRC. Across consultations, stakeholders consistently acknowledged Australia's global leadership in regulation, but highlighted that enforcement is uneven and that "bad actors" can continue to operate through gaps in oversight, data visibility, and accountability. Examples raised included inconsistent monitoring of provider compliance and limited use of physical site visits, reducing the effectiveness of existing safeguards under ESOS and the National Code. Jurisdictional limitations over offshore agents were also identified as a key constraint, reinforcing the importance of provider responsibility for the agents they engage, and the need for stronger and more consistent monitoring and enforcement of provider obligations within Australia's jurisdiction.

To evaluate potential approaches consistently and fairly, the project applies six guiding principles reflecting the priorities shared across the sector: keeping students at the centre; protecting and promoting Australia's reputation; eliminating bad practice and rewarding good practice; encouraging competition and innovation; ensuring the model is adaptable and responsive; and ensuring it is practical and aligned with existing requirements. These principles provide a structured basis for identifying the core components of an agent quality framework and determining what should be included in each policy option.

Drawing on this evidence base, the report presents three policy options—each building on the previous in both effort and impact—to strengthen agent quality, accountability and transparency. Model 1 (Signal) is a light-touch, sector-led approach focused on establishing baseline visibility and expectations through registration and training. Model 2 (Standardise) introduces more consistent system-wide requirements, clearer provider obligations, improved data sharing, and stronger mechanisms for accountability without introducing new regulatory enforcement. Model 3 (Strengthen) provides a more comprehensive framework, incorporating higher assurance measures and stronger oversight settings to address persistent risks and support long-term integrity.

The report is structured in three parts: Part A presents the desktop review; Part B summarises stakeholder consultation insights; and Part C outlines the three policy options in detail, including their core components and comparative considerations. The next step is to use this work as a foundation for continued co-design with the sector and targeted advocacy to government, ensuring that future integrity measures are evidence-based, proportionate, and capable of delivering meaningful improvements in student protection and sector confidence.



Students at the centre:

The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.



Protects and promotes Australia's reputation:

The framework safeguards and enhances Australia's standing as a trusted, high-quality international study destination.



Eliminates bad practice and rewards good practice:

In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.



Encourages competition and innovation:

The framework supports a dynamic and competitive marketplace by reducing barriers to contract access for high-quality agents and fostering innovation in service delivery.



Adaptable and responsive:

The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.



Practical and aligned:

The framework provides clarity and usability for both providers and agents, building on – but not duplicating – the requirements of the *Education Services for Overseas Students Act 2000* (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code).

Key findings

The stakeholder consultations and desktop research highlighted a set of critical considerations for designing an effective and sustainable agent quality framework in Australia. There are:

- Stronger and more consistent enforcement of existing ESOS and National Code requirements—including more active monitoring and routine on-site visits to providers—would significantly influence provider behaviour and leave non-compliant agents with fewer pathways to operate.
- Student transfers are not all the same and are not always wrong. There are often legitimate reasons for students wanting to transfer between providers.
- A baseline agent registration system was deemed as essential to improve transparency, coordination and accountability across the network.
- The framework should be scalable, beginning with a light-touch approach and building over time as needed.
- Agent-provider relationships are commercial, and any model must avoid unnecessary regulatory burden or requirements that undermine competitiveness.
- Balancing integrity with practicality is critical to achieving widespread adoption and long-term sustainability.
- Government involvement is necessary for a quality assurance framework to be taken seriously. It allows for more effective oversight, monitoring and enforcement of requirements, particularly for onshore operations.
- Enforcement mechanisms should be proportionate and targeted, prioritising serious non-compliance and applying clear, transparent consequences.

- Government jurisdiction is limited offshore, reinforcing the need for sector-led mechanisms – such as provider accountability, data sharing, student feedback loops and registration conditions – to influence agent behaviour internationally.
- Co-design with agents, providers and government is essential to ensure legitimacy, buy-in and operational feasibility.
- Providers play a central role in enforcing standards as they choose which agents to work with and are ultimately accountable for those partnerships.
- Recognition and reward mechanisms for high-performing agents can incentivise quality, encourage voluntary adoption and help build a culture of professionalism.

It is also noted that while a new framework can significantly lift the industry-wide standards for all players, not least students, it is not the solution to certain problems that are sometimes associated with agents. For example, the legal but undesirable practice of ‘course hopping’ or ‘student poaching’. These challenges are better resolved through the enforcement of existing regulations for non-compliant institutions and changes to visa settings, for example requiring students to reapply for a visa if they wish to change institutions.

However, the limitations of a framework in addressing these behaviours do not diminish the need to address how agent quality is currently governed. While Australia’s current international education framework places clear and enforceable obligations on providers, the quality of education agent practice is largely managed through private, bilateral arrangements between institutions and agencies. This can result in fragmented oversight with limited transparency and few system-wide incentives for consistently high-quality practice. Where issues arise, they are typically addressed reactively and locally, with limited visibility beyond the individual provider relationship. The models outlined in this report do not seek to replace or duplicate existing regulation under ESOS, but to address this structural gap by introducing shared visibility, clearer quality signals and proportionate mechanisms that operate across the agent ecosystem rather than solely within individual contracts.

A baseline agent registration system is deemed essential to improve transparency, coordination and accountability across the network. To ensure credibility and consistent uptake, any QA framework should include compulsory registration through a government-managed register—potentially within the Department of Education—supported by PRISMS-linked data and existing ESOS enforcement levers.

Against this backdrop, the report sets out three agent quality models that build progressively on existing settings, ranging from enhanced visibility through to more structured coordination and oversight.

Policy options – Agent quality models

Drawing on extensive stakeholder feedback and guided by the six guiding principles, these three proposed models outline a scalable pathway – from minimal adjustment to existing practice through to a more comprehensive, high-assurance system. Each model is built from the same core components of an effective framework.



Model 1 – Signal

A light-touch model that focuses on visibility and builds on existing regulations. It introduces a national agent register, (co-designed with the sector and managed by government), mandatory signing of the code of ethics and baseline training to signal Australia's intention to act on agent quality and to show what good practice looks like. These changes signal Australia's commitment to a high-integrity international education system – protecting students, strengthening provider and agent accountability, and reducing opportunities for poor-quality or unethical behaviour

Core features: Register, Code of Ethics, voluntary training, best practice guides, existing enforcement



Model 2 – Standardise

A shared-responsibility model that introduces a more consistent approach to standards across the system. It includes mandatory training, clearer provider obligations, improved data sharing and formal mechanisms to capture student voice.

Core features in addition to Model 1: Mandatory training, provider obligations, data sharing, student voice, performance recognition



Model 3 – Strengthen

A more comprehensive integrity model with stronger oversight and performance monitoring to protect system integrity and address high-risk behaviour.

Core features in addition to Models 1 and 2: Government enforcement, compliance monitoring, individual registration, formal student feedback, data integration, public transparency

The diagram below shows how the models could build over time. They also allow for decision-makers to choose the model they are most comfortable with, knowing it can be strengthened later if necessary or desirable.

Figure 1: Overview of the three proposed models



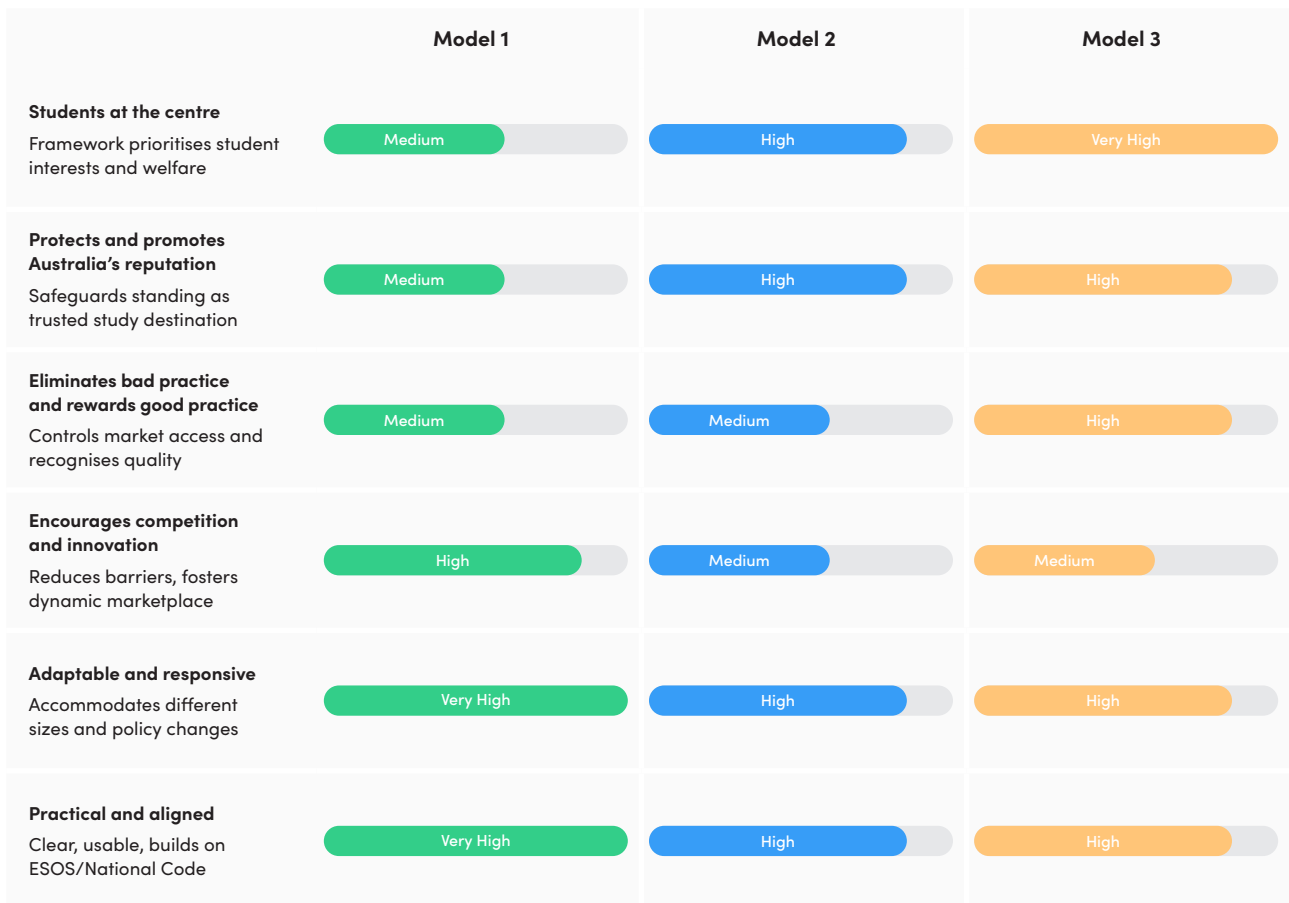
The diagram below shows the extent to which each of the components within each model aligns with the six guiding principles.

Figure 2: Alignment with Guiding Principles across models

Alignment with Guiding Principles

How effectively each model addresses the six core principles?

■ Model 1: Signal
 ■ Model 2: Standardise
 ■ Model 3: Strengthen



Recommendations

The actions listed below offer a path toward a credible, coordinated, and student-centred framework capable of strengthening integrity and supporting Australia's long-term competitiveness in international education.

As next steps, this report recommends the below.

- Working with government early to clarify feasible roles in oversight, monitoring, data sharing and any potential changes to visa settings and policy.
- Co-designing the preferred model with agents, providers, peak bodies and student representatives to ensure practicality, acceptance and long-term sustainability and effectiveness.
- Further refine the criteria for registration and de-registration and how the register will be implemented and managed
- Piloting foundational components, such as training or transparency measures, to build system-wide value and refine implementation. An agreed statement of what constitutes a 'good' agent, expectations of them and/or best practice guides could be completed early in the implementation phase.
- Developing a staged implementation roadmap that sequences actions, identifies dependencies and aligns with broader integrity reforms.
- Continued advocacy for clearer messaging and more stability from government on policy directions impacting the sector.
- Continued engagement with the Agent Reference Group, including, but not limited to, providing the group with an opportunity to see this report.

Moving toward implementation

Australia's international education sector is at a pivotal moment. Strengthening the integrity and transparency of education agent practices is essential not only to protect students, but also to safeguard Australia's global reputation and ensure the long-term sustainability of the sector. This report identifies the core components of an effective agent quality framework and presents three scalable models—ranging from light-touch improvements to a more comprehensive assurance system—shaped directly by stakeholder feedback and anchored in six guiding principles.

The findings make clear that meaningful progress is both possible and widely supported. Providers, agents and peak bodies share a strong appetite for greater consistency, clearer expectations, and stronger enforcement of existing rules. At the same time, recent government policy changes signal that reform is already underway, with increased attention on integrity measures across both provider and agent practices. This reinforces the importance of acting quickly, while ensuring future settings are proportionate and targeted to address poor practice without creating unintended consequences for ethical agents and high-quality providers.

Implementing a coherent quality framework will require partnership across the sector and clear leadership from government. To ensure reforms are practical, effective, and sustainable, the sector must play an active role in shaping the design of any future quality assurance framework and related policy development. Taking even the first steps outlined in this report would send a strong signal that Australia is committed to student protection, quality practice and preserving the integrity of its largest services export. The models provide a structured basis for IEAA's engagement with government and the broader sector to strengthen agent quality in a way that is credible, implementable, and owned by the international education community itself.

Project purpose

International education agents play a critical role in recruiting quality students to Australia, acting as key intermediaries and ambassadors for Australian education. While Australia has strong legislation to protect international students, regulation of commercial education agents remains limited and underdeveloped. In line with recommendations from recent parliamentary inquiries and international best practice, IEAA has undertaken this project to explore global approaches to agent regulation and to examine potential frameworks for enhancing quality assurance, compliance and ethical standards in the Australian context. While the outcome of this research may initially lead to a sector-led solution, it is anticipated that the feedback and evidence provided will be used to inform future government policy.

Project process

The project was carried out with a structured, phased approach to ensure comprehensive research, stakeholder engagement and practical outcomes.

Initiation phase

- Confirmed project goals, priorities and expectations
- Identified stakeholders for interviews and selected global and cross-sector quality frameworks for review
- Established the Agent Reference Group to provide sector input
- Agreed on the guiding principles for assessing potential models

Research and analysis phase

- Conducted a literature review and desktop analysis of international and cross-sector frameworks
- Undertook extensive stakeholder consultations, including interviews and focus groups with the Agent Reference Group
- Developed potential components for a possible framework
- Tested key assumptions and gathered feedback from stakeholders
- Refined the framework components and determined their inclusion across the three proposed models
- Delivered written reports summarising findings and recommendations

What this report covers

The report is structured in three parts.

- **Part A** – Desktop review of international and cross-sector agent quality frameworks
- **Part B** – Summary of stakeholder consultations, including peak bodies, providers, agents and global quality bodies
- **Part C** – Policy options – including detailed model components, rationale and comparative assessment against the guiding principles

Part A – Literature review and desktop analysis

Assessment framework

This analysis evaluates international education agent quality assurance models against six guiding principles developed in consultation with IEAA. These principles reflect Australia’s policy priorities and sector needs, providing a consistent lens through which to compare diverse approaches from different jurisdictions.

The models assessed were:



Assessing each model against the same criteria enables us to:

- Identify design strengths and weaknesses in a structured, comparable way
- Understand trade-offs between different policy objectives
- Surface practical lessons and transferable insights from real-world implementation
- Inform the development of a fit-for-purpose Australian framework

Guiding principles

The following six guiding principles were used to assess each model.



1. **Students at the centre:** The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.



2. **Protects and promotes Australia’s reputation:** The framework safeguards and enhances Australia’s standing as a trusted, high-quality international study destination.



3. **Eliminates bad practice and rewards good practice:** In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.



4. **Encourages competition and innovation:** The framework supports a dynamic and competitive marketplace by reducing barriers to contract access for high-quality agents and fostering innovation in service delivery.



5. **Adaptable and responsive:** The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.



6. **Practical and aligned:** The framework provides clarity and usability for both providers and agents, building on – but not duplicating – the requirements of the ESOS Act and National Code.

Methodology

Each model is scored holistically on a 0–10 scale against the six principles, drawing on document analysis, comparative benchmarking and the Edified team’s collective experience across international education systems in Australia, the UK, USA, New Zealand and other major destination countries. Scores reflect both design intent and real-world implementation, with detailed commentary explaining the rationale for each assessment.

This table shows the scoring of each model against the six guiding principles. Scores are from 1 to 10 with 1 being the lowest and 10 being the highest.

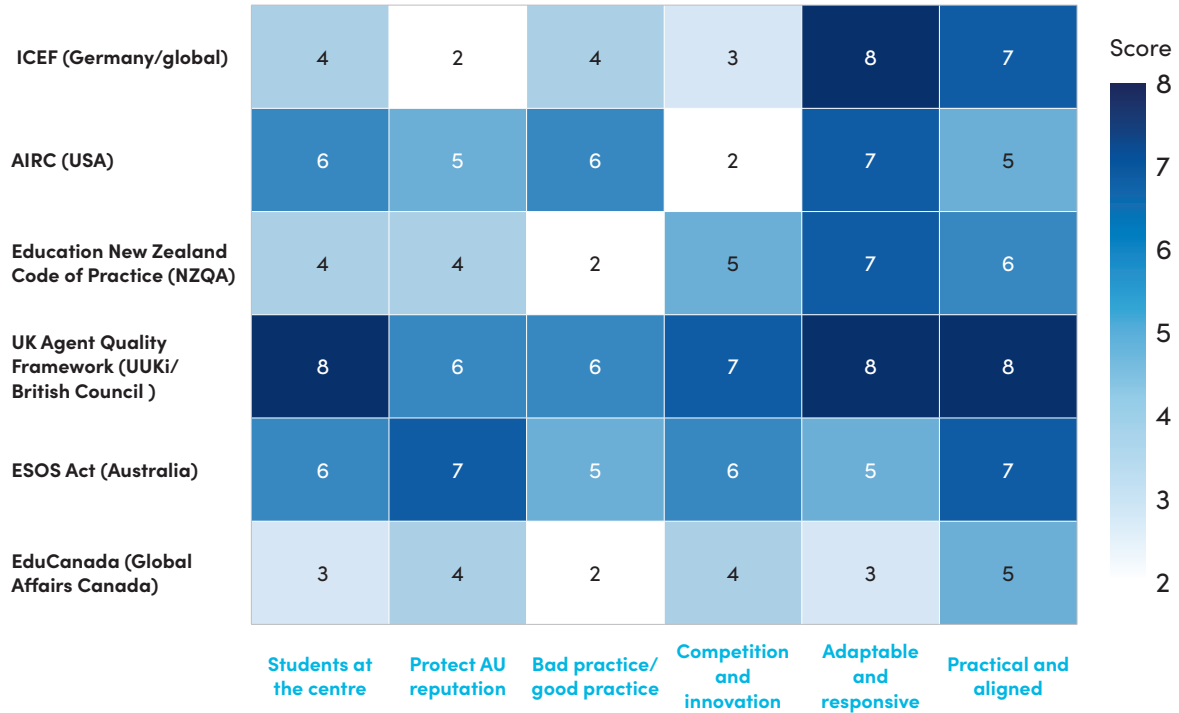
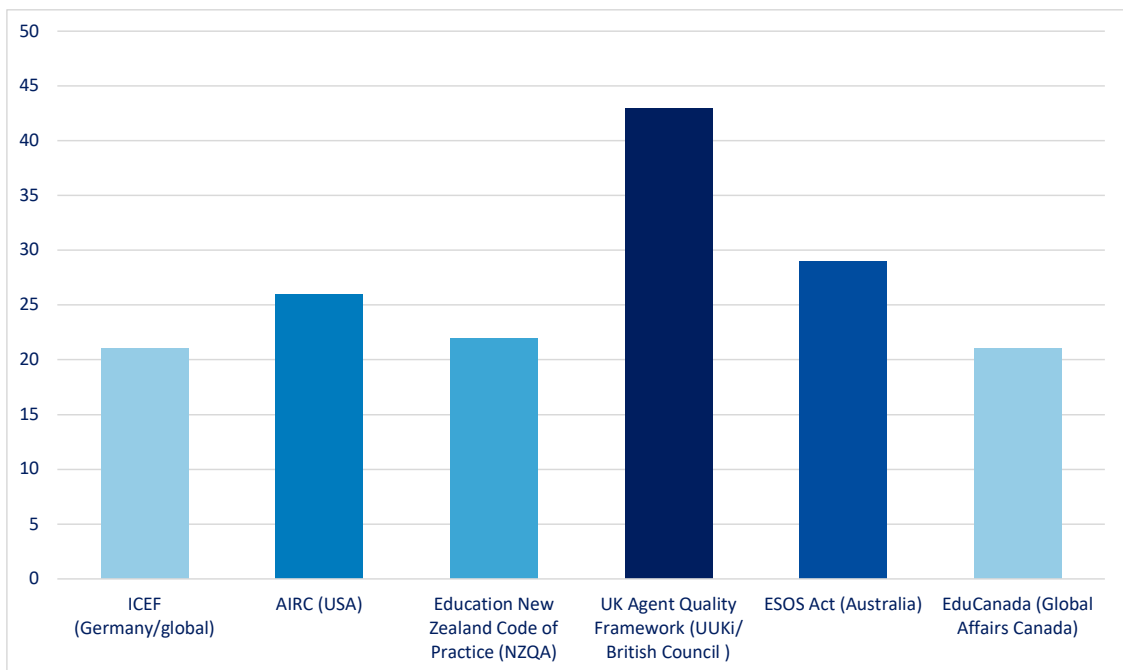


Figure 3: Total alignment by model shows the total score of each model



Common strengths across models

- **Training and professionalisation:** Models with accessible, regularly updated training (ICEF, UK AQF, AIRC) effectively raise baseline capability and knowledge
- **Provider accountability:** Frameworks that embed agent management within institutional responsibility (ESOS, New Zealand, UK) create clear compliance chains
- **Adaptability:** Principles-based, sector-led approaches (UK, AIRC, ICEF) can respond more quickly to policy changes than rigid legislative frameworks

Persistent weaknesses across models

- **Student voice and outcomes:** No model systematically collects or publishes student feedback on agent performance. Quality is assessed through process compliance, training or provider oversight rather than verified student experiences. This represents a significant gap across all jurisdictions.
- **Voluntary participation limits reach:** Even well-designed frameworks (ICEF, AIRC and the UK AQF) struggle to achieve comprehensive market coverage even when participation is optional. Bad actors can simply operate outside the system.
- **Public transparency:** Most models lack publicly accessible information about agent terminations, performance data or comparative quality indicators. Information asymmetry remains profound – students cannot easily verify agent standing or make informed choices.
- **Barriers to entry versus quality:** Rigorous accreditation (AIRC, ICEF Agency Status) protects standards but can exclude smaller, newer or niche-market agents who may deliver excellent service but lack the placement history or institutional references required for certification.

Examples of best practice



Students at the centre

UK AQF:

- A core pillar of the UK AQF is “Empowering student choice and enabling informed decision-making”.
- The framework embeds student-centred principles across its tools and guidance, positioning student welfare and informed consent as the organising aim.
- The framework provides practical, student-facing support tools (for example, Student & Parent Guide, public list of British Council-trained counsellors).
- The framework links agent conduct to institutional responsibility via the National Code and a Good Practice Guide, aligning agent management procedures with students’ best interests.



Protects and promotes Australia's reputation

ESOS:

- The ESOS framework represents one of the most comprehensive regulatory approaches globally for international education quality assurance. ESOS legislation ensures training and education providers meet nationally consistent standards and provides rigorous tuition fee protection.
- Only education institutions registered under the ESOS Act and listed on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) can enrol overseas students on student visas. This creates a publicly visible, government-backed quality threshold that competitors like the UK and US lack.
- The Provider Registration and International Student Management System (PRISMS) tracks provider and agent activities, enabling government monitoring of compliance with ESOS and National Code requirements.



Eliminates bad practice and rewards good practice

All the models assessed were strong in rewarding good practice, but lacked the legislative powers needed to respond quickly and effectively to bad behaviour and hold bad actors to account.

AIRC:

- AIRC strongly supports good practice through a rigorous, audited certification comprising background checks, in-person site review, eligibility thresholds and required evidence of meeting all standards.
- AIRC meets requirements for a student-centred complaints system and has clear responsibilities for master agents or aggregators.

UK AQF:

- The practical advice within Good Practice Guides gives providers levers to monitor and terminate poor performers.
- The government legislation that all providers must sign the UK AQF Pledge is pushing providers to require agents to commit to the National Code, establish student complaint channels, complete counsellor training and undertake other activities that will reward good practice and respond to bad practice.

ESOS:

- ESOS indirectly eliminates bad practice through provider accountability: agents who breach contractual obligations must be terminated and their details can be flagged in PRISMS.



Encourages competition and innovation

UK AQF:

- The free, online, UK-specific training, National Code of Ethics; publicly available Good Practice Guides; and student/parent resources are accessible and usable by agencies of all sizes, reducing knowledge and cost barriers.
- The UK AQF explicitly brings aggregators into scope with responsibilities and disclosure expectations.
- Regularly refreshed training content (including a recent senior level agency-management course) facilitated by the UK AQF encourages professionalisation and service innovation across varied operating models.



Adaptable and responsive

ICEF:

- ICEF applies uniform accreditation and training standards across agencies of all sizes
- It can adapt course content rapidly to meet changing landscapes.
- ICEF's modular design supports flexible, tailored learning across different agency sizes and markets.



Practical and aligned

UK AQF:

- The sector-owned toolkit provides all parties with usable, off-the-shelf materials rather than creating a parallel regime.
- UK AQF assets are built on existing UK guidance (for example, the National Code explicitly traces its roots to earlier UK/sector standards), aligning language and expectations across documents that institutions already use.
- Good practice guides and agent training content were developed by the UK AQF in collaboration with institutions, agents and students to ensure content was relevant and not duplicated elsewhere.
- The framework tools are practical and implementable. Good practice guides include templates and tips, allowing institutions to make immediate enhancements. The National Code and UK AQF Pledge both include examples of how providers and agencies can evidence how they are meeting their commitments rather than simply saying they will.
- UK AQF materials are hosted centrally and signposted by institutions and sector bodies. This ensures version control and consistent messaging.

Accreditation models

The following sections provide a detailed analysis of each model.

1. AIRC (Association of International Enrollment Management) (US)



AIRC is a non-profit organisation that was founded in 2008 to further develop US institutional approaches to the ethical recruitment of international students. The AIRC Board includes an agent representative and over time the AIRC has become the de facto regulator of education agent practice in the US. However, it only has 400 member organisations – including educational institutions and service providers – of the thousands of universities and agents. ICEF is a founding strategic partner of the AIRC. Alongside other international education-oriented membership organisations, AIRC also has a role lobbying government.

Principle	Alignment	Assessment
<p>Students at the centre <i>The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.</i></p>	6/10	<p>AIRC embeds student-centred principles throughout its detailed accreditation standards and robust certification processes.</p> <p>Its dual framework linking institutional and agency accountability aims to safeguard student welfare and ensure ethical recruitment.</p> <p>AIRC does not routinely collect student feedback or outcome data, relying instead on process compliance and institutional oversight. This limits its ability to verify lived student experiences or directly enforce standards beyond its network, meaning student protection depends largely on how institutions implement AIRC's guidance.</p>
<p>Protects and promotes Australia's reputation <i>The framework safeguards and enhances the US's standing as a trusted, high-quality international study destination.</i></p>	5/10	<p>AIRC is designed to protect the integrity of US international recruitment by making agent practice more transparent, more auditable and more accountable within its network. The public standards and certification process reduce reputational risk for participating institutions because they create a defensible baseline for who universities work with and what is expected of agents.</p> <p>However, the model's influence is constrained by uptake. With a relatively small share of institutions and agencies participating, AIRC's impact is real within its ecosystem, but limited as a destination-wide quality signal.</p>
<p>Eliminates bad practice and rewards good practice <i>In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.</i></p>	6/10	<p>AIRC strongly supports good practice through a rigorous, audited certification: background checks, in-person site review, eligibility thresholds and required evidence of meeting all standards.</p> <p>It has strong requirements for a student-centred complaints system and clear responsibilities for master agents/aggregators.</p> <p>AIRC lacks legal powers, so enforcement is restricted to the AIRC network and relies on institutions choosing to require AIRC accreditation.</p> <p>Membership only covers only a small share of US institutions, so AIRC's ability to eliminate bad practice sector-wide is significantly constrained.</p>

Principle	Alignment	Assessment
<p>Encourages competition and innovation <i>The framework supports a dynamic and competitive marketplace by reducing barriers to entry for high-quality agents and fostering innovation in service delivery.</i></p>	2/10	<p>AIRC promotes equitable access through transparent, publicly available standards and a phased Certification Applicant Assessment Program (CAAP) that allows newer agencies up to three years to meet eligibility requirements via modular online training.</p> <p>It offers tiered and discounted fees for under-represented markets to offset membership costs.</p> <p>AIRC also clearly addresses accountability for sub-agents, clarifying potentially complex multi-tier chains.</p> <p>Full certification with AIRC remains costly and administratively demanding, requiring at least two years of operation, a record of more than 25 student placements, and institutional references.</p> <p>These safeguards protect quality but restrict entry for smaller or newer agencies.</p>
<p>Adaptable and responsive <i>The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.</i></p>	7/10	<p>AIRC reviews and updates its frameworks in response to regulatory change, as required by the US Standards Development Organisation.</p> <p>It has a history of recent revisions (2023), adding guidance on AI in admissions, document authenticity and student wellbeing.</p> <p>Its modular CAAP pathway supports agencies who are not ready for full certification.</p> <p>AIRC's relationships with government bodies help align messaging and quickly identify emerging trends.</p> <p>Aggregator agents are welcomed within the AIRC model with clarity that the master agency "takes full responsibility for ensuring compliance with AIRC standards with any sub-agents, franchisees, or other persons acting on its behalf".</p> <p>With no formal government coordination or policymaking role, policy shifts are responded to by AIRC, rather than co-designed.</p> <p>Participation in the framework is voluntary and patchy across the market; even if AIRC adapts quickly, system-wide uptake can lag, limiting real-world agility.</p>
<p>Practical and aligned <i>The framework provides clarity and usability for both providers and agents, building on – but not duplicating – existing sector guidelines, legislation and national codes in the USA</i></p>	5/10	<p>The AIRC model is practical and clear. Detailed agency standards and separate institutional standards are publicly available, showing what 'good' looks like and how responsibilities are shared.</p> <p>The certification pathway – eligibility, fees, timelines and CAAP – is well-documented, giving predictable steps and expectations.</p> <p>There is no single statutory national code in the US. Institutions rely on voluntary frameworks (for example, NACAC, EducationUSA, NAFSA) and AIRC adds a complementary, operational layer to this guidance.</p> <p>Participation is voluntary, so market-wide clarity is uneven. Benefits are strong inside the AIRC ecosystem, but national uptake depends on institutional choice.</p>

What can the Australian education sector learn from the AIRC model?

AIRC provides a clear, operational blueprint for quality. Its detailed standards (agents and institutions) set out what 'good' looks like, backed by robust, audited certification processes (background checks, self-evaluation, in-person site reviews). Clear master-agent accountability for sub-agents clarifies responsibility across multi-tier channels, while requirements for transparent contracts, fee disclosure and student complaints handling strengthen day-to-day practice and student protection. The model is practical with eligibility, timelines, fees and the CAAP on-ramp being well-documented and publicly available. AIRC works well with other sector bodies to update guidance to address emerging risks (for example, AI, document authenticity).

What are the weaker areas of the AIRC model in relation to the Australian education sector?

The model can be costly and administratively heavy, with a high bar to entry putting full certification out of reach for many smaller or newer agencies. Quality assurance leans on process compliance rather than verified student experience. While there is a welcome feedback route for students and the wider public, student outcomes (satisfaction rates, visa approval, student success) are not required metrics for accreditation or renewal.

Participation is voluntary, so AIRC's 'teeth' bite mainly within its own network. Without legal authority or formal government backing, it cannot influence the whole market. To be genuinely transformative at a national level, a much higher level of institutional uptake would be required.

2. Education New Zealand Code of Practice (NZQA)

New Zealand's approach to education-agent quality is anchored in the Education (Pastoral Care of Tertiary and International Learners) Code of Practice 2021, administered by NZQA and supported by Education New Zealand (ENZ) through its AgentLab training and engagement platform.

Along with Immigration New Zealand (INZ) and the Immigration Advisers Authority (IAA), these organisations form a connected regulatory framework that places clear responsibility on tertiary providers to ensure their agents act ethically and give accurate, student-centred advice. ENZ's role is largely developmental, offering guidance and professional learning to strengthen sector capability, but it does not certify or accredit agents.

In practice, this creates a provider-led quality assurance model rather than a nationally regulated or publicly rated system for agents.

The framework has strong compliance teeth for providers but soft accountability for agents. Misconduct is addressed privately through contractual termination rather than through a transparent, sector-wide consequence or reward structure. Without public reporting or a recognition system, reputational incentives for excellence remain weak.



Principle	Alignment	Assessment
<p>Students at the centre <i>The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.</i></p>	<p>4/10</p>	<p>The Code of Practice 2021 is firmly student-centred in its intent (ensuring students receive accurate and ethical advice and are well-informed, safe and cared for), but the monitoring and feedback mechanisms are almost entirely provider-led.</p> <p>If you are an approved education provider and enrol international students, you must sign and follow a code of practice for the care of your students.</p> <p>There is no direct student input or feedback loop in which students can rate, review or otherwise influence an agent's standing or continued recognition.</p> <p>Student complaints are directed towards providers or, in serious cases, the Dispute Resolution Scheme, but that process evaluates provider conduct, not individual agent quality.</p> <p>Students have no transparent means to verify an agent's standing with providers, access comparative quality information or contribute to agent performance assessments. Information asymmetry is profound – students rely entirely on agents' self-representation and providers' private due diligence processes. The framework protects students indirectly through provider accountability, but does not empower them as active participants in quality assurance. Students are passive beneficiaries of institutional oversight rather than partners in maintaining standards.</p>

Principle	Alignment	Assessment
<p>Protects and promotes NZ's reputation <i>The framework safeguards and enhances New Zealand's standing as a trusted, high-quality international study destination.</i></p>	4/10	<p>ENZ ended the ENZRA (Education New Zealand Recognised Agency) program in 2023, replacing it with an open AgentLab hub. This improves inclusivity but removes a discrete recognition badge that some markets used as a reputation signal.</p> <p>AgentLab is designed to support agents with training, resources and sector updates. It is not student-facing and participation is voluntary (no mandatory certification).</p> <p>While the Dispute Resolution Scheme (DRS) is not designed to investigate the performance of education agents directly, it indirectly captures issues arising from agent misrepresentation – such as inaccurate information about fees, accommodation or program content – because these ultimately constitute a provider's breach of the Code. Providers are held accountable for the conduct of their agents, meaning an upheld complaint against a provider can expose underlying agent malpractice.</p> <p>Neither NZQA nor ENZ publishes information about agents terminated for misconduct. This creates a closed-loop accountability system where reputational consequences are private and localised. Problematic agents can move between providers, shift to other markets or rebrand without sector-wide awareness of their history.</p>
<p>Eliminates bad practice and rewards good practice <i>In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.</i></p>	2/10	<p>Neither NZQA nor ENZ publishes information about agents who have been terminated for poor conduct. Consequently, lessons from bad practice are not shared system-wide, and students and other providers cannot easily identify repeat offenders.</p> <p>Each provider determines its own agent vetting, monitoring and termination processes, guided but not audited in detail by NZQA. This results in variable practice and fragmented intelligence on agent quality.</p> <p>The discontinuation of the ENZRA program in 2023 removed a national recognition mechanism that previously rewarded reputable agencies.</p> <p>The Immigration Advisers Authority prosecutes unlicensed immigration advice within New Zealand but has no jurisdiction over offshore agents</p> <p>While the Code requires providers to have agent agreements and monitoring processes, there is no tiered system to recognise agents who consistently exceed standards, innovate in student support or demonstrate long-term ethical practice. This removes a key market incentive for excellence. In competitive agent markets, the lack of visible quality differentiation may drive agents toward volume-based strategies rather than practices focused on student outcomes.</p>
<p>Encourages competition and innovation <i>The framework supports a dynamic and competitive marketplace by reducing barriers to entry for high-quality agents and fostering innovation in service delivery.</i></p>	5/10	<p>The NZQA model devolves choice to providers to contract with a diverse agent ecosystem, promoting competition on service quality (for example, responsiveness, accurate advice) rather than membership of a closed scheme.</p> <p>This open-market approach reduces barriers to entry for new and emerging agents, particularly those serving niche markets or employing innovative digital recruitment models.</p> <p>However, the absence of a formal, tiered recognition pathway (post-ENZRA) means less market signalling to reward excellence. Without visible quality indicators, competition may devolve to price competition or volume metrics rather than service quality differentiation.</p>

Principle	Alignment	Assessment
<p>Adaptable and responsive <i>The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.</i></p>	7/10	<p>The Code of Practice 2021 and NZQA guidance are high-level, principles-based and updated with supplementary provider guidance. Providers are expected to determine appropriate practice for their learners and update agent contracts and monitoring accordingly. This flexibility enables institutions to respond to their specific contexts: different source markets, learner cohorts, risk profiles and institutional resources.</p> <p>The framework can accommodate policy changes (visa rule adjustments, pandemic responses, geopolitical shifts) without requiring legislative amendment, and providers can adjust agent management practices in real-time rather than waiting for sector-wide regulatory updates.</p> <p>Because teeth operate via providers, system-wide responsiveness relies on institutional execution (for example, refreshing contract clauses, training, quality assurance and spot checks on sub-agents). There is no mechanism to ensure consistent, timely responses across all providers when external conditions change. Well-resourced universities may adapt quickly; smaller private training establishments may lag significantly.</p>
<p>Practical and aligned <i>The framework provides clarity and usability for both providers and agents, building on – but not duplicating – the requirements of the ESOS Act and National Code.</i></p>	6/10	<p>AgentLab offers a single entry-point to updates, resources and sector guidance, reducing information fragmentation for agents engaging with the New Zealand market. This centralisation improves practical accessibility compared to scattered guidance across multiple institutional websites.</p> <p>The principles-based approach creates significant variance in how providers interpret and implement agent management requirements. There are no standardised templates for agent agreements, no common KPIs for monitoring, and no shared definitions of what constitutes adequate due diligence. This makes it difficult for agents working with multiple New Zealand providers to understand baseline expectations or demonstrate compliance efficiently across partnerships.</p> <p>The Code of Practice 2021 operates largely independently of INZ's visa framework. While INZ and IAA are mentioned as part of the 'connected regulatory framework', there are no formal data-sharing protocols or coordinated enforcement mechanisms.</p>

What can the Australian education sector learn from the NZQA model?

The New Zealand model shows the value of a single, well-understood national standard that sits above individual institutional policies. Even where implementation varies, the Code of Practice 2021 creates a shared reference point for what is expected and gives regulators a clean basis for enforcement.

AgentLab is also instructive in a practical sense. A central hub that provides regular updates, training resources and consistent messaging reduces information fragmentation and helps agents stay current without the system needing to be heavy-handed or expensive.

What are the weaker areas of the NZQA model in relation to the Australian education sector?

The main limitation is that the model is strong on provider compliance, but weak on agent accountability in a way that is visible to students or the market. Poor performance is mostly handled privately through contract termination. There is no meaningful sector-wide consequence structure and no recognition pathway that helps high-quality agents stand out.

The end of ENZRA makes this more obvious. Removing a recognised badge improved inclusivity, but it also removed a simple market signal that some students and providers used to separate stronger agencies from the rest.

3. UK Agent Quality Framework (UUKi/British Council/BUILA)



The UK AQF started as a voluntary quality assurance scheme driven through universities and is currently transitioning to become a mandatory requirement for institutions to maintain their student sponsor licence.

Principle	Alignment	Assessment
<p>Students at the centre <i>The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.</i></p>	8/10	<p>The UK AQF is genuinely student-centred in intent and design. “Empowering student choice and enabling informed decision-making” is a core pillar of the framework.</p> <p>It embeds student-centred principles across its tools and guidance, positioning student welfare and informed consent as the organising aim.</p> <p>The model provides practical, student-facing support tools (for example, Student and Parent Guide, public list of British Council-trained counsellors).</p> <p>It links agent conduct to institutional responsibility via the National Code and a Good Practice Guide, aligning agent management procedures with students’ best interests.</p> <p>The UK AQF is strong on signalling competence (training, commitment to practice standards) but less focused on student outcomes. There is no overarching mechanism for institutions to monitor how well their agents are meeting their UK AQF commitments.</p>
<p>Protects and promotes the UK’s reputation <i>The framework safeguards and enhances the UK’s standing as a trusted, high-quality international study destination.</i></p>	6/10	<p>The framework is specifically designed to ensure advisers understand the UK study offer and the integrity of UK Visas and Immigration (UKVI) rules. The National Code sets sector-wide standards clarifying expected behaviours and reducing reputational risk from poor practice.</p> <p>Good Practice Guides translate the Code into actionable processes, giving universities practical levers to safeguard brand and compliance. Student and Parent Guides provide guidance on how to select a ‘good agent’.</p> <p>Government requirement for institutions that use agents to sign up to the UK AQF (via Sponsor Licence policy) is a move towards sector-wide accountability.</p> <p>The framework does not operate an overarching accreditation of agencies. The British Council certifies individual counsellors (knowledge/awareness test) and lists them publicly, but it does not endorse or accredit organisations. There is no statutory requirement for agents to be certified, participation was originally voluntary and at the discretion of the contracting institution, but is now transitioning to become mandatory.</p> <p>Co-authorship by multiple sector bodies (British Council, BUILA, UKCISA, UUKi) gives the UK AQF a single, trusted standard that boosts legitimacy and sends clear market signals that protect ‘Brand UK’.</p>

Principle	Alignment	Assessment
<p>Eliminates bad practice and rewards good practice <i>In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.</i></p>	6/10	<p>The framework primarily rewards good practice, with indirect penalties for bad practices. The UK AQF leans on positive signals (for example, British Council training, public database of certified counsellors, the National Code) to recognise and surface compliant practice.</p> <p>Practical advice within the Good Practice Guides gives providers levers to monitor and terminate poor performers. The move to record agent details on Confirmation of Acceptance for Studies (CAS) documents will strengthen traceability over time.</p> <p>However, there is no sector-wide register of poor practice or accreditation of agencies and the proposed mechanism for flagging concerns is not yet fully public.</p> <p>The government legislation that all providers must sign the UK AQF Pledge is pushing providers to require agents to commit to the National Code, establish student complaint channels and complete counsellor training.</p> <p>However, in the absence of a legal requirement for providers to only work with 'accredited agencies' and the lack of an agency accreditation system, eliminating bad practice and bad actors largely depends on each institution's individual agent management practices and risk tolerance.</p>
<p>Encourages competition and innovation <i>The framework supports a dynamic and competitive marketplace by reducing barriers to entry for high-quality agents and fostering innovation in service delivery.</i></p>	7/10	<p>The free, online, UK-specific training, National Code of Ethics; publicly available Good Practice Guides; and student/parent resources are accessible and usable by agencies of all sizes, reducing knowledge and cost barriers.</p> <p>Regularly refreshed training content (including a recent agency-management course) facilitated by the UK AQF encourages professionalisation and service innovation across varied operating models.</p> <p>The framework explicitly brings aggregators into scope with responsibilities and disclosure expectations, but there are no standard requirements on how this is implemented, how data is gathered, or consequences for lack of information or misrepresentation.</p> <p>Movement towards agent data on CAS documents should, over time, enable fairer comparisons and performance-based selection – fuel for healthy competition. However, there is no clarity yet on how agent data will be recorded on CAS documents (master agents, sub-agent or both?).</p>
<p>Adaptable and responsive <i>The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.</i></p>	8/10	<p>The UK AQF is operationally flexible and policy-aware. Co-leadership by the British Council, BUILA, UKCISA and UUKi enables shared horizon-scanning and coordinated communication with government, improving responsiveness.</p> <p>The sector-owned tools (training, good practice guides, code of ethics) can be updated quickly. Agent and counsellor training recertifies on a two-year cadence, ensuring users maintain up to date knowledge.</p> <p>The public database of certified counsellors is continuously updated to reflect current certification status, giving providers and students a real-time check point.</p> <p>The sector-led channel for flagging concerns about agent practice remains in development. Information exchange is uneven and largely informal, and follow-up action sits with individual institutions. This slows and fragments feedback loops on emerging visa/policy shifts, reducing its ability to coordinate consistent and impactful adjustments.</p>

Principle	Alignment	Assessment
<p>Practical and aligned <i>The framework provides clarity and usability for both providers and agents, building on – but not duplicating – existing sector guidelines, legislation and national codes in the UK.</i></p>	8/10	<p>A sector-owned toolkit packages the National Code, UK AQF Pledge, Good Practice Guides (for providers, agents and students), agent training and a public counsellor list, providing all parties with usable, off-the-shelf materials rather than creating a parallel regime.</p> <p>The assets are built on existing UK guidance. For example, the National Code explicitly traces its roots to earlier UK/sector standards aligning language and expectations across documents institutions already use. Good practice guides and agent training content were developed in collaboration with institutions, agents and students to ensure content was relevant and not duplicated elsewhere.</p> <p>The framework's tools are practical and implementable. Good Practice Guides include templates and tips, allowing institutions to make immediate enhancements. The National Code and UK AQF Pledge both include examples of how providers and agencies can evidence how they are meeting their commitments rather than simply saying they will.</p> <p>Materials are hosted centrally and signposted by institutions and sector bodies. This ensures version control and consistent messaging.</p> <p>Lack of data clarity – for example, no agent details on CAS documents and a fledgling channel for sharing concerns on bad practice – plus the fact that there is no overarching accreditation or quality kite mark for agencies, means that the framework does not offer institutions the full clarity on agent quality that they would ideally like.</p>

What can the Australian education sector learn from the UK AQF model?

The UK AQF provides a clear, sector-owned operating toolkit, empowering institutions and agencies to implement 'what good looks like' without creating a parallel bureaucracy. It is genuinely student-centred and accessible to agencies of all sizes with a significant effort made to lower cost and experience barriers. The framework covers contemporary operating models (digital aggregators and sub-agents) and gives providers practical agent management tools. Cross-sector leadership and a government requirement for sponsors using agents to sign the UK AQF Pledge strengthen common expectations. Moves toward including agent details on CAS documents and a formal risk-sharing mechanism, supported by a live certified counsellor database, improve traceability and real-time verification, supporting reputation and market discipline.

What are the weaker areas of the UK AQF model in relation to the Australian education sector?

The UK AQF lacks an overarching agency accreditation kitemark. British Council certification validates individual counsellor knowledge, but does not accredit organisations.

Agent participation in the UK AQF is still voluntary, and how this is implemented by institutions varies significantly.

Data clarity is still maturing; the risk-sharing mechanism for poor practice is not yet fully operational and agent details on CAS documents – including how master/sub-agent roles are recorded – are still in development, limiting sector-wide visibility.

The framework is strong on good practice signals and process guidance, but there is no unified mechanism to monitor whether agents are meeting the UK AQF commitments; consequently, excluding bad actors and rewarding good ones still depends heavily on individual universities' agent management practices and risk tolerance.

4. ESOS Act



The ESOS Act framework attempts to combine comprehensive regulatory oversight with provider-mediated agent management. This creates accountability for providers but leaves agents operating in a largely unregulated space, free to contract with multiple providers simultaneously and move between partnerships without cumulative consequences for misconduct or rewards for excellence.

Principle	Alignment	Assessment
<p>Students at the centre <i>The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.</i></p>	6/10	<p>The ESOS framework requires registered providers to ensure their education agents act ethically, honestly and in the best interests of overseas students, with this obligation codified in Standard 4 of the National Code 2018. Providers must have written agreements with agents, monitor their activities and take immediate corrective action when agents fail to comply with their responsibilities.</p> <p>The Commonwealth Ombudsman can investigate complaints from international students about private education providers and education agents who have agreements with providers. The Tuition Protection Service (TPS) assists international students whose providers default, either arranging alternative placements or providing refunds of unspent tuition fees.</p> <p>While PRISMS agent performance reports track student outcomes, including visa refusals, cancellations and course completion rates, this data is currently provided only to individual providers for agents they have agreements with, and is not made publicly available to students. The long-promised public reporting has not materialised despite announcements dating back to 2018.</p> <p>Students cannot publicly rate agents, contribute to agent assessments or access comparative quality information when selecting representation. The framework assumes students will be protected by provider oversight, but provides no mechanism for students to inform that oversight through their experiences.</p> <p>Students experiencing agent misconduct must complain to the provider first, making the process indirect and potentially ineffective if the provider has strong commercial interests in maintaining the agent relationship.</p>
<p>Protects and promotes Australia's reputation <i>The framework safeguards and enhances Australia's standing as a trusted, high-quality international study destination.</i></p>	7/10	<p>The ESOS framework represents one of the most comprehensive regulatory approaches globally for international education quality assurance. ESOS legislation ensures training providers meet nationally consistent standards and provides rigorous tuition fee protection.</p> <p>Only education institutions registered under the ESOS Act and listed on CRICOS can enrol overseas students on student visas. This creates a publicly visible, government-backed quality threshold that competitors like the UK and US lack.</p> <p>PRISMS tracks provider and agent activities, enabling government monitoring of compliance with ESOS and National Code requirements.</p> <p>Integrity concerns are particularly concentrated in the VET sector, where course-switching and visa-selling allegations are most prevalent. The framework's provider-led model may be less effective in a highly fragmented, commercially-driven sector compared to more established university systems.</p>

Principle	Alignment	Assessment
<p>Eliminates bad practice and rewards good practice <i>In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.</i></p>	5/10	<p>ESOS indirectly eliminates bad practice through provider accountability: agents who breach contractual obligations must be terminated and their details can be flagged in PRISMS.</p> <p>However, because PRISMS data is not public, and there is no sector-wide recognition mechanism for exemplary performance, transparency and reward remain limited.</p> <p>Government reforms aim to publish aggregated agent performance data to allow market-wide visibility, but implementation has been repeatedly delayed.</p> <p>At present, reputational incentives are weak, and problematic agents can continue operating by shifting provider relationships.</p> <p>The framework is robust on compliance but weak on incentivisation, it prevents malpractice reactively rather than promoting excellence proactively.</p>
<p>Encourages competition and innovation <i>The framework supports a dynamic and competitive marketplace by reducing barriers to entry for high-quality agents and fostering innovation in service delivery.</i></p>	6/10	<p>Proposed amendments to the ESOS Act enable providers to access performance data about all education agents, not just those they have existing relationships with, allowing providers to make better-informed decisions about agent engagement. This reduces information asymmetry and allows quality differentiation based on measurable outcomes rather than reputation alone.</p> <p>Unlike the discontinued ENZRA in New Zealand or British Council accreditation in the UK, Australia provides no credential or tiered recognition system for agents demonstrating consistent excellence. This limits the market premium that quality agents can command and reduces incentives for innovation in service delivery.</p> <p>The government has identified collusive practices between agents and providers around onshore student transfers, with agents earning commissions for facilitating course-switching. This creates incentives for agents to prioritise volume and transfers over student outcomes. The proposed ban on onshore commissions aims to address this, though stakeholders warn it may drive problematic practices underground rather than eliminate them.</p>
<p>Adaptable and responsive <i>The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.</i></p>	5/10	<p>The ESOS framework is robust in its ability to identify and eliminate poor practice but remains largely ineffective in recognising or rewarding excellence. Its strength lies in the compliance chain linking agents to providers; where an agent engages in misconduct, the provider is legally required to act, supported by the regulator's powers to sanction or suspend non-compliant institutions.</p> <p>Fit-and-proper requirements, ministerial intervention powers, and the PRISMS system's capacity to flag anomalies give the framework a genuine enforcement backbone. These mechanisms create a credible deterrent effect and allow regulators to detect patterns of concern across large volumes of data.</p> <p>However, the framework's reach ends at the provider boundary. Agents themselves are not regulated entities under ESOS and face no direct legal or financial consequences for malpractice. Misconduct results in private contract termination rather than public accountability, and intelligence about poor behaviour is fragmented across institutions and regulators. There is no shared registry of terminated or high-risk agents, meaning individuals or businesses removed by one provider can quickly re-enter the market under a different partnership or trading name.</p> <p>The reward side of the equation is weak. Although performance data within PRISMS could, in theory, highlight high-performing agents, this data remains confidential and is not used to drive reputational incentives or streamline compliance for those demonstrating consistently ethical practice.</p>

Principle	Alignment	Assessment
<p>Practical and aligned <i>The framework provides clarity and usability for both providers and agents, building on – but not duplicating – the requirements of the ESOS Act and National Code.</i></p>	7/10	<p>The ESOS Act and National Code together form a clear, integrated compliance system recognised across the sector.</p> <p>For providers, obligations are unambiguous: written agreements, monitoring, corrective action and termination where necessary.</p> <p>The PRISMS platform provides a single data source linking agents to enrolments and visa outcomes, offering clarity that few other systems achieve.</p> <p>However, from an agent’s perspective, usability is limited. ESOS is designed around provider compliance rather than agent behaviour, leaving individual counsellors reliant on institutional interpretation of requirements.</p> <p>Without a shared industry training or accreditation framework, understanding of ESOS obligations among agents varies widely.</p>

What can the Australian education sector learn from the ESOS Act?

Australia’s ESOS settings show the value of building agent management into a broader compliance system rather than treating it as a separate add-on. Standard 4 creates a clear expectation that providers must have agreements in place, monitor behaviour and take action where problems arise.

PRISMS is also a genuine asset. It creates traceability between agents, providers, enrolments and visa outcomes, which very few destinations can match.

What are the weaker areas of the ESOS Act in relation to the Australian education sector?

Agents sit outside the formal regulatory perimeter. Consequences for poor behaviour are mostly private and fragmented, and there is no consistent way for the market to learn from issues or for students to make informed choices.

The lack of public reporting is also a structural problem. If PRISMS outcomes data remains confidential, it cannot operate as a market discipline mechanism. It becomes a private tool for individual providers rather than a system-wide signal.

Finally, the framework remains skewed toward preventing and responding to poor practice rather than actively rewarding excellence.

5. EduCanada



Principle	Alignment	Assessment
<p>Students at the centre <i>The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.</i></p>	3/10	<p>The Government of Canada does not qualify, accredit, guarantee or endorse education agents, leaving international students with no federal-level quality assurance mechanism when selecting their agent.</p> <p>At the federal level, there is currently no collective policy on education agents, with no accreditation system or formal endorsement of any education agents, nor is there any legislation, policy or guidelines that apply to how institutions can work with education agents.</p> <p>Provincial consumer protection varies significantly, with only Manitoba providing comprehensive legislative protection through its International Education Act.</p>
<p>Protects and promotes Canada's reputation <i>The framework safeguards and enhances Canada's standing as a trusted, high-quality international study destination.</i></p>	4/10	<p>Canada has invested significantly in the EduCanada brand and international marketing. In 2023–24, the Trade Commissioner Service delivered marketing campaigns that led to 3.4 million visitors to the EduCanada website and generated \$31.6 million in direct exports of education services.</p> <p>The Designated Learning Institution (DLI) system provides some quality threshold – only institutions designated by provincial or territorial governments can receive international students requiring study permits.</p> <p>Recent federal interventions have focused on controlling immigration volume rather than improving quality:</p> <ul style="list-style-type: none"> • Introduction of Provincial Attestation Letters (PALs) in 2024 to cap study permit allocations • Requirements for DLIs to report student compliance twice yearly, with suspensions for non-compliant institutions • Students must now apply for new study permits when transferring between DLIs <p>These measures address symptoms but not the underlying agent misconduct that contributes to integrity concerns. Unlike Australia's National Code Standard 4, there is no legislative requirement for institutions to ensure agents act ethically and in students' best interests.</p>
<p>Eliminates bad practice and rewards good practice <i>In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.</i></p>	2/10	<p>This is the biggest weakness for EduCanada as there is virtually no mechanism to eliminate bad practice or reward good practice at a sector-wide level.</p> <p>Institutions can terminate individual agent contracts, but this remains a private commercial decision with no public record, shared registry or sector-wide consequence, meaning agents removed by one institution can immediately establish relationships with others without any equivalent to Australia's requirement for immediate corrective action when agents breach obligations.</p> <p>Global Affairs Canada's consultation papers for the renewed International Education Strategy identify unethical agent practices as a key vulnerability and question whether agents can self-regulate or whether a body like the College of Immigration and Citizenship Consultants (CICC) should oversee them. However, these remain discussions rather than implemented reforms.</p>

Principle	Alignment	Assessment
<p>Encourages competition and innovation <i>The framework supports a dynamic and competitive marketplace by reducing barriers to entry for high-quality agents and fostering innovation in service delivery.</i></p>	4/10	<p>The voluntary Canada Course for Education Agents (CCEA), jointly owned by ICEF, Languages Canada and CAPS-I and covering various aspects of the Canadian education system, provides some professional development; however, the course remains optional, with no requirement that agents complete it to operate in the Canadian market.</p> <p>The immigration restriction under Bill C-35 creates a specialised niche: education agents providing immigration advice must be accredited through the CICC.</p>
<p>Adaptable and responsive <i>The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.</i></p>	3/10	<p>The institutional-led model is highly flexible in allowing varied agent relationships as institutions can contract with small boutique agencies, large aggregators, sub-agents or individual counsellors without regulatory constraints.</p> <p>Manitoba's International Education Act includes a Code of Practice and Conduct for designated education providers and their recruiters, with a Director of International Students position to oversee compliance. This demonstrates that provincial regulation is feasible, but the model has not been replicated elsewhere despite being operational since 2016.</p>
<p>Practical and aligned <i>The framework provides clarity and usability for both providers and agents, building on – but not duplicating existing legislation</i></p>	5/10	<p>There are clear requirements at the provincial level. Institutions must meet provincial criteria to be listed as DLIs and maintain compliance with reporting obligations. Requirements are documented in provincial policy frameworks, such as Ontario's 'Requirements for Designated Learning Institutions under the International Student Program'.</p> <p>The DLI Portal enables post-secondary institutions to complete student compliance verification requests from IRCC twice yearly, providing a centralised reporting mechanism for student enrolment status.</p> <p>For agents, the picture is far murkier. There are no common national standards for agent conduct, training or practice.</p> <p>The voluntary CCEA provides educational content but carries an exam fee of €295 (or €99 for IAS-accredited agency members) and is not required to operate as an agent in Canada.</p> <p>Professional associations like the Canadian Bureau for International Education (CBIE) have developed codes of practice, but these are non-binding and apply only to member institutions, not to agents directly.</p>

What can the Australian education sector learn

Canada is a useful reminder of what happens when there is no strong national position on education agents. The market defaults to institutional choice, local practice and informal reputational signals. That flexibility can feel attractive, but it leaves students with very limited ability to judge agent quality and leaves institutions carrying the reputational risk when things go wrong.

What are the weaker areas in relation to Australia

The most obvious weakness is the absence of a national baseline for agent conduct and training. With no common framework, agent management becomes inconsistent and students have no reliable, comparable quality signal.

There is also no mechanism to share intelligence about poor practice across the system. Institutions can terminate relationships, but that tends to be private and local. Agents can move between institutions without cumulative consequences.

The voluntary training option helps at the margin, but it does not shift the system because completion is optional and not meaningfully tied to market access or ongoing recognition. In practice, the model relies on goodwill and self-selection, which is rarely enough where commercial incentives are strong.

6. ICEF (Germany / Global) Privately owned accreditation model



ICEF is a global organisation that provides training, vetting and accreditation for international education agents and counsellors. Its core offerings include the ICEF Agency Status (IAS) – an accreditation program assessing agencies through reference checks, due diligence and annual reviews – and the ICEF Academy, a large-scale training and certification platform with over 140,000 users worldwide and bespoke online training packages to upskill counsellors with specific market knowledge alongside key skills such as safeguarding, sales techniques and an introduction to international education.

ICEF requires its qualified agents to endorse and uphold the ICEF Code of Conduct and maintains a publicly accessible and searchable register recognising its certified counsellors and accredited agencies.

Principle	Alignment	Assessment
<p>Students at the centre <i>The framework prioritises the interests and welfare of students, recognising their reliance on agents for accurate, ethical and well-informed advice.</i></p>	4/10	<p>ICEF embeds student-centred values through training and the ICEF Code of Conduct, which emphasise honesty, transparency and safeguarding.</p> <p>However, it lacks a centralised mechanism for collecting and analysing student feedback, meaning quality is assessed through agent knowledge and due diligence rather than verified student outcomes.</p>
<p>Protects and promotes Australia's reputation <i>The framework safeguards and enhances Australia's standing as a trusted, high-quality international study destination.</i></p>	2/10	<p>ICEF strengthens Australia's reputation by aligning training with CRICOS, PRISMS, ESOS and the Agent Code of Ethics – ensuring counsellors understand the country's regulatory and quality-assurance context.</p> <p>The AEATC course and QEAC certification enhance professional standards, but participation is voluntary and IAS accreditation is global rather than Australia-specific, meaning brand awareness will depend on the level to which Australian institutions and agents value and actively promote the value of the certifications.</p>
<p>Eliminates bad practice and rewards good practice <i>In the absence of legal enforcement, compliance is achieved through control of market access, ensuring poor-performing agents are excluded while quality and ethical practice are recognised and rewarded.</i></p>	4/10	<p>ICEF is strong on promoting good practice through rigorous vetting, ethical codes and comprehensive training, but weaker on eliminating bad practice.</p> <p>Enforcement relies on voluntary compliance and market influence rather than legal authority, limiting ICEF's ability to address misconduct beyond its own network.</p>
<p>Encourages competition and innovation <i>The framework supports a dynamic and competitive marketplace by reducing barriers to entry for high-quality agents and fostering innovation in service delivery.</i></p>	3/10	<p>ICEF provides open, globally accessible training with no prerequisites, allowing new agents to upskill easily.</p> <p>Yet, compulsory exam fees and demanding accreditation requirements (for example, four educator references and history of student placements) favour larger, established agencies and limit entry for smaller or newer ones.</p>

Principle	Alignment	Assessment
<p>Adaptable and responsive <i>The framework accommodates agencies of different sizes and operating models, and can adjust to policy or visa changes across different government settings.</i></p>	8/10	<p>ICEF applies uniform accreditation and training standards across agencies of all sizes, and can adapt course content rapidly to meet changing landscapes.</p> <p>Its modular design supports flexible, tailored learning across different agency sizes and markets.</p> <p>However, updates rely on ICEF’s internal processes, with limited oversight or coordination from government bodies.</p>
<p>Practical and aligned <i>The framework provides clarity and usability for both providers and agents, building on – but not duplicating – the requirements of the ESOS Act and National Code.</i></p>	7/10	<p>ICEF offers a clear, easy-to-use online training and accreditation platform aligned with Australia’s regulatory frameworks. The public directory also improves transparency for providers and students.</p> <p>However, some confusion may arise from ICEF’s own Code of Conduct existing alongside the Australian Agent Code of Ethics, and participation remains voluntary.</p>

What can the Australian education sector learn from the ICEF model?

The training element of the ICEF model performs strongly. Its open-entry, online format allows anyone to participate, with no prerequisites or barriers to access. The modular design enables agents to upskill at their own pace and select destination-specific content relevant to their work. Course materials can be updated quickly in response to changes in international education policy or practice, ensuring content remains current and relevant.

The ICEF model reinforces good practice through its comprehensive training and accreditation structure. The ICEF Academy equips agents and counsellors with the knowledge and skills needed to deliver high-quality, compliant advice to students, reinforcing understanding of key legislation and regulatory frameworks relevant to Australia. The IAS accreditation complements this by setting clear professional expectations, while the ICEF Code of Conduct promotes integrity, transparency and safeguarding – helping to ensure agents uphold the ethical standards required to protect students and maintain sector credibility.

What are the weaker areas of the ICEF model in relation to the Australian education sector?

The ICEF model has some limitations that reduce its overall effectiveness as a quality assurance system.

The training certification processes reward knowledge and compliance, primarily assessing counsellor understanding through exams. There is no mechanism to gather or analyse student-focused feedback, meaning quality is judged on exam knowledge rather than on how well agents support or advise students in practice.

The IAS application process creates barriers for smaller or newer agencies, which may meet high ethical and service standards but lack the placement history or institutional references required for certification – favouring larger, more established operators.

Finally, because there is no obligation or legislation requiring agencies to carry IAS accreditation, ICEF’s ability to address or prevent bad practice is limited. ICEF can (and does) restrict participation in its network and revoke accreditation, but it cannot stop unaccredited or unethical agents from continuing to recruit students or partner with institutions directly.

Cross-sector comparators

This section looks at quality models in other sectors.

Migration agents in Australia

Australia already has a domestic example of how intermediary behaviour is regulated in the migration advice sector. The Office of the Migration Agents Registration Authority (OMARA), which operates within the Department of Home Affairs, regulates individuals who provide migration advice for a fee, whether they are based in Australia or offshore.

Registration with OMARA is not voluntary. Migration advice for a fee can only be provided by individuals who are registered. Entry requirements include character checks, completion of prescribed qualifications and an entry-level assessment. Applicants must also agree to a Code of Conduct covering areas such as competence, ethical behaviour, conflicts of interest, client care and record keeping. Registration applies at the individual level rather than the business level, which places responsibility with the adviser rather than the agency structure.

Registration is time limited and subject to renewal. Ongoing registration is contingent on meeting mandatory Continuing Professional Development requirements linked to OMARA's competency standards. Where standards are not met, OMARA has the ability to impose conditions, suspend registration or cancel it. In more serious cases, individuals can be prevented from re-registering.

OMARA maintains a public register that allows consumers and other stakeholders to check an agent's current registration status, including whether registration has been suspended or cancelled. Registration data is published on a regular basis. In practice, OMARA combines a number of functions within a single authority, including registration, training and Continuing Professional Development (CPD) settings, complaints handling, conduct monitoring and publication of sector data.

Operationally, OMARA oversees around 5,000 registered migration agents with a dedicated internal team. While many agents operate offshore, their advice relates directly to Australian migration law and is therefore subject to Australian legislation, providing a clear enforcement pathway that does not rely on voluntary participation.

Implications for international education agents

OMARA is a useful point of comparison, but not a model that can be directly replicated. It operates effectively because registration, minimum standards, transparency and enforcement sit within a single statutory system. Compliance appears to be driven less by training alone and more by individual accountability, public visibility of registration status and the consequences attached to non-compliance.

There are clear limits to the comparison. Migration agents advise on Australian law, which provides a strong legal basis for regulation, including for agents operating offshore. International education agents work across multiple jurisdictions and commercial contexts, much of which falls outside direct Australian regulatory control.

For that reason, OMARA is better understood as a source of system design lessons rather than a blueprint. It highlights the role of individual accountability, public registers and mandatory CPD in professionalising an intermediary market, while also illustrating why a full licensing approach is unlikely to be feasible for international education agents.

It also brings into focus a broader trade-off that applies across intermediary sectors. Stronger quality settings tend to lift standards, but they also raise barriers to entry and alter market participation. Any move towards tighter assurance in international education would need to balance improvements in confidence and consistency against potential impacts on participation, particularly in smaller or emerging markets. As with other intermediary models, the question is not only about standards, but about how much control the system chooses to exercise over who is able to operate within it.

Travel agents in Australia

Australia's travel industry provides a useful case study in what happens when statutory regulation is replaced with voluntary accreditation. From July 2014, state-based licensing and the national Travel Compensation Fund were abolished following a review that concluded consumer protection could be delivered more efficiently through the Australian Consumer Law and general commercial mechanisms such as credit card chargebacks. The Travel Agents Acts were repealed across states and the compensation fund wound up in 2015. Since then, consumer protection has rested largely on general law and payment protections rather than a sector specific regime.

In parallel, the sector introduced the Australian Federation of Travel Agents (AFTA) Travel Accreditation Scheme (ATAS) as a voluntary response. ATAS established a charter, code of conduct, training standards and complaints processes for participating businesses. However, it did not replace the former financial protections, nor did it restrict market entry. Accreditation operates as a quality signal rather than a licence to trade. While this has lifted standards among participating agencies, it has also created a two-speed market in which accredited and non-accredited operators coexist. The overall system now depends far more on consumer choice and awareness than on structural safeguards, shifting both responsibility and risk towards the individual.

Implications for a future Australian agent-quality model

Australia's travel industry experience shows the limits of voluntary systems when they are asked to do the work of regulation. Accreditation can foster professionalism among those who opt in, but it cannot prevent low-quality operators from trading nor address misconduct beyond its membership base. In practice, this creates a framework that rewards the motivated but does little to constrain the indifferent or opportunistic.

The removal of a sector-specific safety net also reveals an important trade off. Simplifying regulation may reduce cost and friction, but it shifts risk from institutions to students. In travel, this risk is comparatively brief and transactional. In international education, it is high value, long term and impactful once a student has committed.

Perhaps the strongest lesson is reputational rather than operational. Voluntary marks only retain value where they are consistently associated with better outcomes. Without enforcement mechanisms or financial safeguards, quality signals risk drifting into branding, which perhaps makes it harder for students and institutions to distinguish between genuine quality and surface-level credibility.

Financial advisers and mortgage brokers

Financial services took the opposite path. Following systemic misconduct exposed during and after the Global Financial Crisis, Australia shifted away from a disclosure-led model towards enforceable conduct obligations. The Future of Financial Advice reforms introduced a statutory requirement that advisers act in the best interests of their clients, banned conflicted remuneration and strengthened the regulator's enforcement powers. The intent was not simply to inform consumers better, but to change behaviour by reshaping incentives.

Mortgage brokers were later brought under a similar regime through amendments to the National Consumer Credit Protection Act, with explicit obligations to prioritise consumer outcomes over commissions. Regulatory guidance translated legislative principles into expectations around governance, client assessment, documentation and conflict management. Disclosure remains part of the system, but is no longer its foundation. Authority, accountability and enforcement are the architecture.

What is notable is that regulation here is not primarily about form filling. It is about risk ownership. The framework makes advisers legally responsible for the quality of advice given, not merely for whether they explained the terms.

Implications for a future Australian agent-quality model

What makes the financial services comparison both powerful and imperfect is jurisdiction. Financial advisers and mortgage brokers operate within Australian borders and can therefore be licensed, monitored and sanctioned directly under Australian law. International education agents do not. Many operate offshore, beyond the practical reach of domestic legislation, which means the tools available to government are fundamentally different.

The financial services example underscores how behaviour rarely changes through transparency alone. Disclosure may inform, but it does not realign incentives. Where income, volume and performance pressures remain untouched, so too does the behaviour they produce. Statutory duties are effective precisely because they disrupt those incentives and because they can be enforced against individuals, not just institutions.

In international education, that enforcement pathway does not exist in the same way. Governments cannot mandate conduct standards for much of the agent market operating offshore. This does not make the financial services comparison irrelevant; it makes the design problem more precise. If obligations cannot be imposed directly on agents, then control shifts to the system around them, the contractual terms, commercial incentives, institutional oversight and transparency mechanisms through which agents are engaged.

In financial services, the shift in practice did not follow guidance or training. It followed licensing powers, penalties and the visible presence of a regulator with authority to act. Trust emerged not from the language of reform, but from the consequences attached to it.

At the same time, the model illustrates the cost of ambition. Higher regulatory thresholds raise professionalism, but they also change the shape of the market. Barriers to entry rise, consolidation accelerates, and some participants exit altogether. Regulation is therefore not just a question of standards, but of market design. A rigid model may raise quality while narrowing access. A permissive model may preserve participation while undermining trust.

Additional observations

UK's proposed mandatory registration system for international recruitment agents

In response to government concerns around potential abuse of the UK's Graduate Route visa scheme, the Migration Advisory Committee (MAC) – the independent body that advises the UK government on immigration policy – was tasked with carrying out a very rapid review of the Graduate Route.

The May 2024 review found no evidence of widespread abuse of this visa route by international students, but raised concerns about transparency and oversight in recruitment practices.

As well as recommending that the Graduate Route remains in its current form, further agent-related recommendations made by MAC following their review included that:

- the government should establish a mandatory registration system for international recruitment agents and sub-agents, which encompasses the quality controls in the UK AQF
- universities should be required to publish data on their spend on recruitment agents and the number of international students recruited through such means annually
- universities should be required to provide the UKVI with information on which recruitment agent was used for each CAS document issued. This would allow UKVI to build a comprehensive dataset on agents and sub-agents and identify areas of concern

While the UK government has confirmed that it is “considering the review's findings very closely”, there has been no concrete announcement regarding how, when or which of the recommendations will be implemented.

A significant challenge for the UK is the lack of shared data. Currently, agent details are not included on CAS statements (visa letters) and many institutions do not have the capability to link agent data to student outcome data.

There are ongoing conversations between sector bodies such as BUILA and Universities UK International and government departments exploring the best approaches to capturing and sharing agent data. A target of Summer 2025 was initially set for agent data to be formally named on CAS documents, with the UKVI committing to “develop the technical capability to add agent details to the CAS”.

EAIE's approach to international education agent quality assurance

The European Association for International Education (EAIE) is a member-led professional body, not a regulator or accreditor. Its contribution to agent quality is capacity-building and thought leadership, not certification or enforcement.

EAIE supports good agent management practices by:

- curating principles rather than setting binding rules. EAIE consistently signposts to established guidance such as the London Statement and, where relevant, to sector tools like British Council training and the UK AQF
- operationalising ethics via practice. Through blogs, EAIE 'Forum' articles, podcasts and conference workshops, EAIE focuses on the *how*: agent selection criteria, due diligence, KPIs/monitoring, complaints handling and off-boarding – helping institutions embed good practice
- building a community of practice. Regular sessions with independent experts provide horizon scanning and peer learning on emerging risks

EAIE does not:

- set binding guidelines or audits. There's no EAIE-run accreditation, sanctions register or certification of agents. EAIE does not collect or publish agent-level outcomes data
- have any enforcement power. Quality assurance ultimately depends on each institution's procurement, contracts and monitoring; uptake and practice vary by country and provider

Part B – Consultation and stakeholder engagement in Australia and globally

A comprehensive consultation process was undertaken to ensure the development of an effective and credible agent quality framework informed by the full breadth of sector experience and international best practice. Edified engaged with peak bodies representing all education sectors, representatives from Austrade, members of the Agent Reference Group (ARG), and international organisations responsible for agent quality frameworks in key competitor destinations such as the UK, Canada and the US. Together, these stakeholders provided valuable insights spanning policy, provider obligations, market dynamics and on-the-ground agent practice.

This breadth of perspectives enabled the project team to test early assumptions, identify areas of convergence and divergence, and understand both the opportunities and limitations inherent in different approaches. There was a high degree of alignment across peak bodies, providers and agents, with many raising the same core issues and priorities. This strong consistency is a positive foundation, giving confidence that a quality model can be developed with broad sector support and clear, shared expectations. The feedback gathered has directly shaped the model options presented in this report, informing both the selection of core components and the scaling of requirements across the three proposed models. Importantly, stakeholder insights have helped ensure that each option is grounded in practical implementation considerations, aligned with sector expectations, and responsive to the challenges and opportunities identified throughout the consultation process.

Stakeholder consultations

Consultations with Australian international education peak bodies provided critical insights into the practical realities, challenges and opportunities across the higher education, VET, ELICOS and schools sectors. These bodies, representing the collective perspective of providers, highlighted what they see as the core components of an effective agent quality framework, including registration and accreditation, training, governance, student-centred practices, and mechanisms for recognition and accountability. They also identified gaps in the current regulatory framework, such as inconsistent enforcement of existing standards, limited visibility of agent performance, and uneven compliance across providers and sectors. Peak bodies emphasised the role of government in supporting a framework by providing endorsement, oversight, and mechanisms to enforce provider obligations, while acknowledging that much of the day-to-day accountability would need to be sector-led. Their insights have been instrumental in shaping the proposed models, ensuring they are practical, achievable and responsive to both provider needs and broader regulatory expectations.

Interviews were conducted with senior staff from the following organisations and their insights and feedback has been summarised below. Individual and agency names have been withheld to enable more open and honest feedback.



Common themes emerging from stakeholders

The themes below emerged from interviews with staff from the organisations listed above.

The need to have clear definitions of agents, agencies and counsellors, and expected professional standards. While the new government definition of agents was released mid-project, and this was supported as a good step, the strong view is that the definition is too broad and needs refinement.

A national, government-administered registration or accreditation system with individual-level accountability. This was viewed as the most effective way to reduce poor agent practices, as it provides clear expectations and meaningful consequences for non-compliance. However, stakeholders noted that the Australian Government can only enforce laws within Australia, limiting its ability to regulate offshore agents directly. This reinforces the need for stronger enforcement of existing legislation governing providers, who *are* within Australia's jurisdiction and can be held accountable for the conduct of the agents they engage.

Better enforcement of existing laws (ESOS, National Code) rather than creating new regulatory layers.

All interviewees outside of government consistently highlighted that Australia is widely recognised globally for having strong regulations governing international education, including the ESOS Act and the National Code. However, they observed that these rules are not always consistently or rigorously enforced by the relevant regulatory bodies, creating gaps in accountability and allowing some poor agent and provider practices to persist. A specific example raised was the limited use of physical site visits, with compliance monitoring often occurring remotely or "on paper," which can miss serious integrity issues—such as providers maintaining the appearance of compliant operations while classrooms remain largely empty or not delivering genuine face-to-face learning. Stakeholders noted that if enforcement were applied more systematically, including stronger provider monitoring and verification, many of the issues currently affecting student experiences, agent behaviour and provider compliance could be significantly reduced. The consensus was that robust enforcement—not just well-designed regulations—is critical to maintaining the integrity, reputation and credibility of Australia's international education sector.

Mandatory baseline training for counsellors and agents, focused on integrity, compliance and student welfare was strongly supported. Baseline training for counsellors and agents, if made mandatory, would ensure that all individuals advising international students have a clear understanding of integrity, compliance obligations, workplace laws and student welfare. Training was seen as critical in reducing the risk of misinformation and supporting consistent, high-quality guidance to students.

Improved data sharing, integration and visibility across PRISMS, Home Affairs, ASQA and TEQSA. While it was recognised that PRISMS data is useful, there appears to be limited sharing across departments and between regulators. Greater connectivity would allow providers to identify trends and risks and to make more informed decisions about who they do and do not work with, and regulators to respond quickly to potential breaches.

Students at the centre. This theme was unanimously agreed as the single most important aspect of an agent quality framework. Publishing clear guidelines on what constitutes good practice helps agents, providers and students understand expectations and align behaviours accordingly. A student feedback mechanism was strongly supported as a way of monitoring and measuring this; however, there was also caution about the added administrative burden of mandatory student reporting and actioning their complaints.

Using existing systems more effectively, with digital tools and AI. This is to support proactive risk detection, identification of concerning patterns and early intervention in cases of misconduct. Technology enhancement should be used where possible to enhance the sector's capacity to manage compliance efficiently without overburdening stakeholders. A recommendation that regulators could use AI to identify trends and check agent/provider contracts was put forward as a way to speed up compliance checking and acting on breaches.

Balancing integrity and accountability with practicality. The commercial nature of the agent/provider relationship was raised often as influencing behaviour on both sides. Both agents and providers are businesses and no quality framework should impede competitiveness or consumer (student) choice considerations. Any framework should focus enforcement and compliance efforts where risks are highest, while still maintaining fairness, accessibility and scalability across the sector.

The following quotes are representative of individuals' sentiments and have been paraphrased or edited for clarity.

"Agent are there to serve the consumer, and consumers – students – should know what to expect from them"

"Better data integrity will enable more 'policing' of integrity issues"

"Commercial interests and self-interest often get in the way. Providers should hold firm, [and be] made more accountable for who they choose to work with"

"Any new guardrails should not disregard the established, professional relationship between providers and their agents"

"ESOS mechanisms are there but are not being implemented fully"

"There needs to be a way to reward good practice beyond just numbers"

"There are so called 'classrooms' that are empty and the regulators are not conducting site visits, so they are getting away with it"

Divergent views

The administration and location of any new entity. There were differing views on the most appropriate place for any new entity to sit and who should be responsible for administering a proposed register and any other elements of the preferred policy option. Some suggested OMARA already had structures in place that could be leveraged. Other stakeholders suggested that it could be an extended function of IEAA, though this was not a widely supported view, with interviewees citing the paid membership model of IEAA could be a conflict of interest. If government is involved, the Department of Education was mentioned as a common sense place for any new entity to reside given the capacity for data flows via PRISMS.

Transparency in agent performance. While better sharing of data to identify risks and trends, and to reduce duplication, was a common theme, the extent to which any agent-specific data should be made publicly available differed greatly, ranging from being fully supported to completely opposed.

A centralised, searchable register of provider/agent agreements, agent performance data and compliance history. While providing a single source of truth and increased transparency, a register was supported by less than half of the stakeholders interviewed. The main objection centred around lack of confidence in the integrity of the data, integration between government departments and limitations of current performance data.

Allowing new players into the market. This was discussed in the context of what a criteria for registration might be. Views ranged between new agents needing to have a minimum number of years of experience plus provider references, to strong objection to this idea due to encouraging 'cartel' type arrangements that could restrict new, potentially high-quality agents into the market. It also risks limiting the capacity to recruit from new and emerging markets and retain diversity in the cohort.

The following quotes are representative of individuals' sentiments and have been paraphrased or edited for clarity.

"Any criteria should include references and a history of working with Australian providers."

"Any requirement for references and previous experience will limit access to new, potentially good, players."

"Students should be able to validate agents through a searchable register."

"Good providers should band together and agree to only work with good agents. The bad ones will then have nowhere to go."

"PRISMS doesn't integrate with [the] immigration system, so the data has gaps and cannot safely be used to measure integrity."

"Department of Education are best placed to manage a register as they can access PRISMS data, as long as that doesn't mean everything gets stalled."

Consultations with global bodies

In addition to the consultation with Australia peak bodies, Edified conducted consultations with international bodies responsible for agent quality frameworks, listed below, to understand the approaches they have taken, lessons learned and advice for the IEAA in developing an Australian framework. Most of these frameworks have focused on training, best practice guidance, and light-touch or minimal registration and accreditation processes. Across all consultations, there was strong recognition that Australia already leads globally in terms of regulatory standards for international education, and these bodies expressed keen interest in observing how the Australian sector develops a comprehensive, sector-led agent quality framework. Their insights provided valuable comparative perspectives, highlighting both opportunities and practical considerations for implementing effective measures in the Australian context.

Interviews were conducted with senior staff from the following organisations and their insights and feedback has been summarised below.



Insights and lessons learned

- **Mandatory training.** Most international frameworks have emphasised training for agents and the provision of best practice guides rather than formal registration or accreditation. This may not have the desired impact for Australia.
- **Uplift capability.** The aim of the frameworks was to improve overall agent capability rather than enforce strict regulatory oversight.
- **Provider closures.** As a result of the Education Quality Assurance requirement introduced in British Columbia, Canada five years ago, several providers closed. The Educational Credential Assessment (ECA) is administered by the British Columbia government and governs the behaviours of providers only, not agents.
- **Limited enforcement.** Accountability mechanisms are generally informal and rely on provider relationships rather than government enforcement. Though this approach is less resource-intensive and relies on agents acting in good faith, it still requires a level of resourcing.

- **Providers are the key to managing agent behaviour.** Providers continue to play a critical role in influencing agent behaviour and provider accountability is a key lever for maintaining standards where government authority is limited.
- **Provider-led oversight.** To be effective, a framework should include provider-led oversight, such as selecting preferred agents, monitoring performance and sharing feedback. Involving the government may have more impact but is more difficult and slower to implement.
- **Australia's reputation for strong regulations.** Australia's strong regulatory environment for international education is widely recognised and admired. Global bodies expressed interest in Australia's sector-led approach to quality frameworks, noting it could provide a model for other countries.
- **Sector collaboration.** Their experiences reinforced that strong guidance, supported by sector collaboration, can have a meaningful impact even without heavy-handed regulation. Co-designing the model with the sector will be critical.

Below is a summary of advice interviewees had for IEAA in developing an agent quality framework:

- ✓ **Start simple: frameworks that are too complex or burdensome risk low adoption.**
- ✓ **Continuous engagement with agents and providers is essential to refine guidance and maintain relevance.**
- ✓ **Transparent expectations and clear communication are crucial for uptake and credibility.**
- ✓ **Design frameworks that are scalable and adaptable, recognising differences in agency size, market and resources.**
- ✓ **Incorporate student-centred principles at the core. It is hard for stakeholders to argue with this in terms of rationale for changes.**
- ✓ **Consider mechanisms for recognition of good practice, which encourages adoption and motivates improvement.**

The following quotes are representative of individuals' sentiments and have been paraphrased or edited for clarity.

“Institutions will always push back regardless of how light touch the model is. Don't let that stop you.”

“Our government does not want to get involved in policing or monitoring of agents.”

“We wish we had gone further.”

“An iterative approach will limit push-back. We started with a low bar, but it has had limited impact”.

“With all the policy change happening around the same time, impact of the agent quality framework is hard to measure.”

Agent Reference Group (ARG)

The ARG brought together experienced practitioners from a diverse range of agency sizes and international markets. Across most topics, participants were overwhelmingly aligned in their views, demonstrating strong consensus on the key priorities for a quality agent framework. The main area of divergence related to the entry of new players into the market, reflecting differing perspectives on balancing access and quality. ARG members expressed that being invited to provide input was validating and reinforced their commitment to the sector. They emphasised that developing an effective framework requires collaboration between agents, providers and the broader sector, and they strongly expressed a desire to remain involved in co-designing the model wherever possible. The involvement of this group to date has enabled us to gather practitioner insights, sense-check assumptions, and identify risks and opportunities prior to developing the models.

Consultation approach

- Six participants per session, representing small, medium and large agencies across different markets
- Online focus groups using interactive tools (for example, Mural) to gather structured input
- Questions covered core components of an agent quality framework, practical implementation, risks, and sector-wide considerations
- Members provided feedback asynchronously between sessions
- Individual and agency names have been withheld to enable more open and honest feedback

Participation

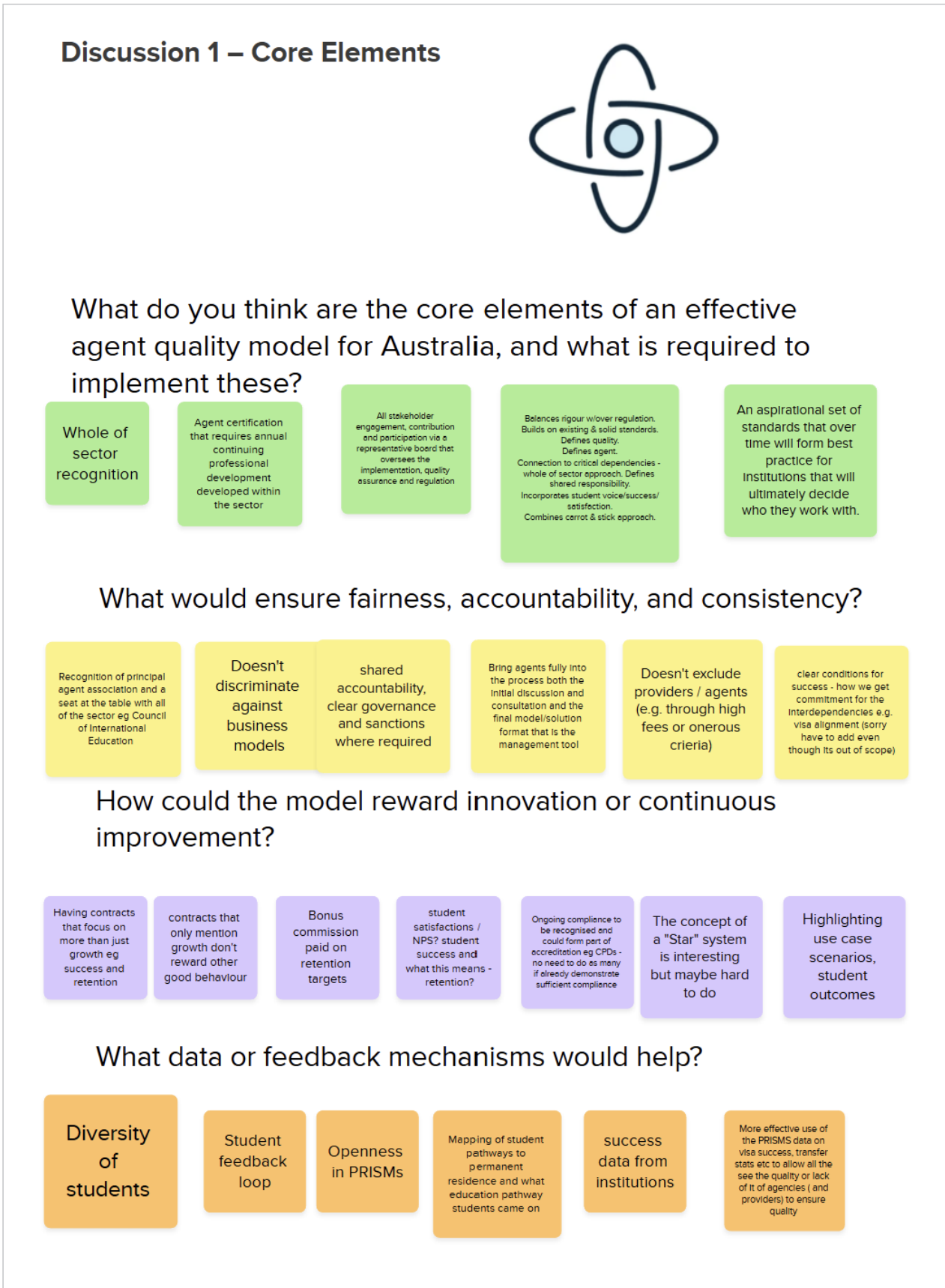
Nominated representatives from the following agencies participated:



Process

Two approaches were used in the two sessions with the ARG. In the first session, a digital whiteboard was used to allow maximum input from each participant, and their views were captured in writing under a number of topic areas. The second session was structured as an online discussion to allow for frank and honest debate and the challenging of ideas. Below is an example of one of the sets of responses captured on a digital whiteboard.

Figure 4: Stakeholder workshop output



Common themes emerging from Agent Reference Group

Agents recognised the need for clearer expectations and consistent standards across providers. Agents want uniform definitions, clearer quality benchmarks and alignment with ESOS/National Code to reduce ambiguity. They also stressed the need for shared responsibility across the sector so expectations are consistent, not institution by institution.

Concerns about unethical or low-quality agents affecting sector reputation. Stakeholders repeatedly highlighted onshore poaching, misuse of sub-agents and weak enforcement mechanisms. Poor behaviour by a minority continues to damage trust and Australia's reputation as a high-quality study destination.

Desire for mechanisms that support ethical practice without creating unnecessary administrative burden. Participants favoured practical, scalable solutions such as CPD-based certification, improved data visibility and simple compliance pathways. They stressed that frameworks must not become bureaucratic or penalise well-performing agencies.

Opportunity to use technology, data and training to reduce poor practice. Better use of PRISMS data, standardised performance dashboards, student feedback loops and practical PD were widely supported. Technology is seen as a tool for transparency, early detection of issues and reinforcing quality behaviour.

Fairness and transparency are critical. Members emphasised the need for open data sharing, consistent sanctions, clear governance and sector-wide accountability. A fair model must treat different agency types equitably and provide visibility of performance without unfairly penalising innovation or scale.

Practicality and scalability matter for small and mid-sized agencies. Any framework must accommodate the realities of varied business models, including small agencies with limited resources. Stakeholders strongly rejected high-cost or overly complex requirements that could distort competition or exclude quality operators.

Collaboration between agents, providers and regulators is key. There was clear support for a whole-of-sector approach involving providers, agents, peak bodies and government. Many suggested a representative governing board to oversee standards, data use and certification.

Shared commitment to student welfare and protecting Australia's international reputation. Student-centred outcomes – accurate advice, ethical behaviour and genuine student pathways – were highlighted as the core of any effective model. Protecting national reputation was universally recognised as a shared responsibility across all stakeholders.

Divergent views

Entry of new agents: some favour easier access to encourage market growth, others emphasise stronger vetting to protect quality. Some participants advocated for open, low-barrier entry to support innovation and competition, especially for offshore entrepreneurs. Others argued for a more robust vetting process to prevent bad actors entering the system and raising institutional risk.

Level of mandatory compliance versus voluntary participation. Views varied on whether a sector-led model should be entirely voluntary or backed by mandatory government oversight. Some preferred a light-touch, incentive-based approach, while others felt only government-enabled enforcement could drive consistent behaviour across the market.

Disclosure of agent performance data and public accountability measures. Opinions diverged on how transparent agent performance data should be – some pushed for public visibility and a 'star' system, while others warned of legal risk, misinterpretation, and unfair impacts on smaller or newer agencies. Balancing transparency with fairness remains contested.

The following quotes are representative of individuals' sentiments and have been paraphrased or edited for clarity.

“We need a model that defines quality clearly, rewards good behaviour and puts students at the centre – without drowning providers or agents in unnecessary regulation.”

“Bad actors undermine the entire sector, but most agents are doing the right thing. Better data, clearer expectations and consistent enforcement will help us recognise the good and deal fairly with the rest.”

“Transparency is essential, but it has to be paired with fairness. Performance data must illuminate quality – not punish innovation or smaller agencies trying to grow ethically.”

“A sector-led approach can work, but only if agents, providers and government share responsibility. No single part of the system can fix this alone.”

“If we want to protect Australia’s reputation, we must align incentives around student success – accurate advice, ethical recruitment and pathways that support long-term outcomes.”

Implications of the desktop review and consultations on policy options development

The consultations with the ARG, peak bodies and global education bodies provided rich insights into what a practical, effective and credible agent quality framework should include. Across these diverse perspectives, common themes emerged around the importance of student-centred practice, clear and consistent standards, training, recognition, accountability and proportionate enforcement. The feedback highlighted both opportunities and constraints – such as government jurisdictional limits and the need to avoid overburdening ethical agents – while confirming the value of a collaborative, government/sector co-designed approach. These insights have directly informed the design of the three proposed models in Part C, ensuring that each option reflects real-world, practical considerations as well as stakeholder priorities, and could potentially deliver global best practice. Implications for each model are grouped into the core components of an agent quality framework.

Registration

- All consultation groups emphasised that a baseline of agent registration is critical to ensure transparency and accountability.
- Models should be scalable and start with a light-touch approach.
- Registration criteria needs to balance accessibility for new, capable agents with mechanisms to exclude high-risk operators.

Training

- All consultation groups agreed on the importance of mandatory baseline training, particularly around integrity, compliance and student welfare.
- Training should be modular, accessible and regularly updated, with requirements scaling with model intensity.
- Incorporating sector-wide standards ensures consistency while allowing flexibility across different markets and agency sizes.

Provider obligations

- It must be a partnership. Providers are central to enforcing standards, as they engage agents and hold them accountable.
- Best practice guides are needed for providers also.

Quality assurance/enforcement

- Enforcement mechanisms must be proportionate, transparent and focused on serious non-compliance.
- Stakeholders acknowledged government limitations in regulating offshore agents, reinforcing the need for enforcement through provider obligations, data sharing, student feedback loops and registration conditions.
- Across all models, agent registration is mandatory and managed through a government-administered register, with enforcement mechanisms increasing in intensity—from light-touch compliance and market-based consequences in Model 1 to structured monitoring, audits, and formal suspension or de-registration pathways in the higher models.

Data and reporting

- Integrated, transparent data systems are essential for monitoring performance, identifying risk and supporting accountability.
- Early models may rely on voluntary reporting, while higher models incorporate formalised, centralised reporting across providers and regulators.
- Data should be used to inform decision-making, detect emerging trends and support continuous improvement.

Governance

- Strong governance is necessary to ensure transparency, fairness and credibility. And to have teeth, the government must have a role in administering, monitoring and enforcing any new requirements.
- Governance intensity can scale across models, with light-touch self reporting in Model 1 and formalised structures with recourse in other models.

Student voice

- Student feedback mechanisms are essential for monitoring agent and provider performance, and identifying poor practice should form a part of each model.
- The framework should embed student-centred principles from the start, ensuring that models maintain student welfare and informed decision-making as core priorities.

Recognition and reward

- The model should include recognition and reward mechanisms.
- Recognition of high-performing agents would encourage adoption and promote a quality culture.
- Recognition acts as a positive incentive and aligns with stakeholder feedback on rewarding ethical and effective practice.

Communication and advocacy

- Clear communication about expectations, processes and benefits is crucial to drive uptake and adoption.
- Stakeholders stressed the need for consistent messaging and guidance for both agents and providers. Ideally, there would be a centralised, two-way communication channel for updates and questions.
- The Austrade agent portal, and other existing agent broadcasts, could be leveraged in Model 1.
- Advocacy efforts should highlight the value of quality-assured agents for student welfare and sector reputation.

Part C - Policy options and evaluation

This section outlines the proposed policy options for an Australian agent quality framework, drawing on the core components identified through desktop research and extensive stakeholder consultation. These components form the foundation of any effective, student-centred and transparent system. They cover registration, training, provider obligations, quality assurance and enforcement, data and reporting, governance, student voice, recognition and reward, and communication and advocacy. They establish clear expectations for agents and providers, support ethical practice, and uphold Australia's reputation as a trusted study destination. The three models presented: Signal, Standardise and Strengthen, apply these components with progressively increasing depth and oversight to illustrate different pathways for improving transparency, accountability and integrity in the agent ecosystem. Together, they offer IEAA a structured set of options to consider, balancing feasibility, impact and sector buy-in, and provide a basis for future discussion with government and the broader international education community.

Alignment with recent ESOS changes

The models presented in this section have been developed in the context of recent updates to ESOS requirements relating to education agents, commission arrangements and provider reporting obligations. These changes strongly signal that government is already progressing integrity reforms and is likely to continue strengthening its involvement in provider and agent quality measures. They reinforce the case for a coordinated agent quality framework by clarifying provider accountability while also highlighting gaps that can be addressed through practical, sector-informed mechanisms. The proposed models are designed to complement—and not duplicate—these updated ESOS requirements, while supporting effective implementation and minimising unintended impacts on high-quality providers and ethical agents.

Core components of an agent quality framework

Registration (and/or accreditation). A compulsory, government-managed register creates a transparent and structured way to identify education agents operating in the Australian international education ecosystem. By setting clear entry criteria and increasing ongoing expectations with each model, registration provides a foundation for market confidence, enables providers to make informed partnership decisions, and—if publicly available—helps students identify trustworthy advisors. Importantly, a government-administered register also supports stronger integrity outcomes by enabling consistent verification of agent details and providing a formal mechanism for status changes, including suspension or de-registration where registration conditions are not met or serious integrity concerns are substantiated. This establishes a credible baseline for visibility, accountability, and quality assurance across the agent network.

Training. Training ensures that agents have up-to-date knowledge of Australia's education system, visa settings, compliance requirements and student support expectations. As policy and market conditions shift, training becomes essential for maintaining accuracy and consistency in information provided to students. Well-trained agents reduce integrity risks, improve student outcomes and strengthen Australia's reputation as a high-quality study destination. Opportunities to develop new skills can also be seen as an incentive to retain and attract high-performing counsellors who are serious about furthering their career in international education.

Provider obligations. Education providers play a central role in the agent ecosystem and their participation is essential for any framework to be effective. Provider obligations – such as reporting data, sharing performance concerns and using registered or accredited agents – help ensure that standards are applied consistently and that poor practice is not inadvertently rewarded. This component strengthens the overall system by aligning provider behaviour with quality objectives. It also is a strong signal that the success of the sector depends on strong partnerships between agents, providers and government, with students at the centre.

Quality assurance and enforcement. For the model to be effective there should be some element of quality assurance and escalation mechanisms. This may range from existing ESOS and National Code requirements and peer reporting through sector forums to structured monitoring and escalation pathways that enhance accountability and integrity.

Data and reporting. Data and reporting provides objective, evidence-based insights into agent performance, student outcomes and market trends. It allows the sector to identify risks early, support continuous improvement, and

make informed decisions about accreditation and oversight. Strong data foundations are critical for transparency, accountability and the long-term credibility of any agent quality framework.

Governance. Governance provides the structure, decision-making authority and accountability needed to oversee the framework effectively. It ensures fairness, transparency and consistency in how standards are applied, complaints are handled and quality is monitored. Strong governance builds trust across the sector and gives the framework credibility with providers, agents, government and students.

Student voice. Student voice mechanisms give direct insight into students' experiences with agents, highlighting both good practice and areas for concern that providers alone cannot see. Feedback helps the sector identify patterns, respond to emerging risks, and ensure that the framework remains focused on student needs and protection. This component is essential for maintaining a genuinely student-centred system.

Recognition and reward. Recognition and reward reinforce positive behaviour by highlighting agents who consistently demonstrate high ethical standards, strong student outcomes and professional excellence. This creates incentives for continuous improvement and helps high-performing agents differentiate themselves in competitive markets. Celebrating quality also sends a strong global message about Australia's commitment to integrity and professionalism.

Communication and advocacy. Clear communication and strong advocacy ensure that the purpose, expectations and benefits of the framework are understood by stakeholders across global markets. This helps drive awareness, adoption and consistent messaging to students and families. Effective communication also enhances Australia's reputation internationally and reinforces the value of choosing quality-assured agents.

The three models (Signal, Standardise, Strengthen)

Any new approach for agent quality in Australia will not start from a blank page. ESOS, the National Code and PRISMS already provide a relatively strong spine of provider accountability, visa and enrolment monitoring, and tuition-fee protection compared with many competitor systems. The three proposed models should therefore be read as additive overlays on top of this existing architecture, not as wholesale replacements. Each option assumes the current ESOS obligations and data infrastructure remain in place, with the addition of a mandatory, government-managed agent register to establish baseline transparency and accountability across the agent network. The key difference between the models lies in how much additional standardisation, assurance, and collective discipline the sector is willing to build around this foundation.

Seen in that light, Model 1 – Signal is a low-burden approach that introduces a mandatory register, shared code of ethics and baseline training, making agent participation visible and establishing clear minimum expectations, while leaving the underlying ESOS compliance chain unchanged. Model 2 – Standardise builds on this by introducing more consistent national requirements for training, reporting, student feedback and complaints handling, improving comparability and coordination across providers while still relying on ESOS for statutory enforcement. Model 3 – Strengthen goes further by meaningfully increasing the level of assurance through stronger quality controls, higher-integrity data, and audit or review capability to address persistent gaps—particularly around student voice, cross-provider intelligence, and transparency on agent performance.

Figure 5: Model summary cards

This diagram gives a snapshot of each of the models.

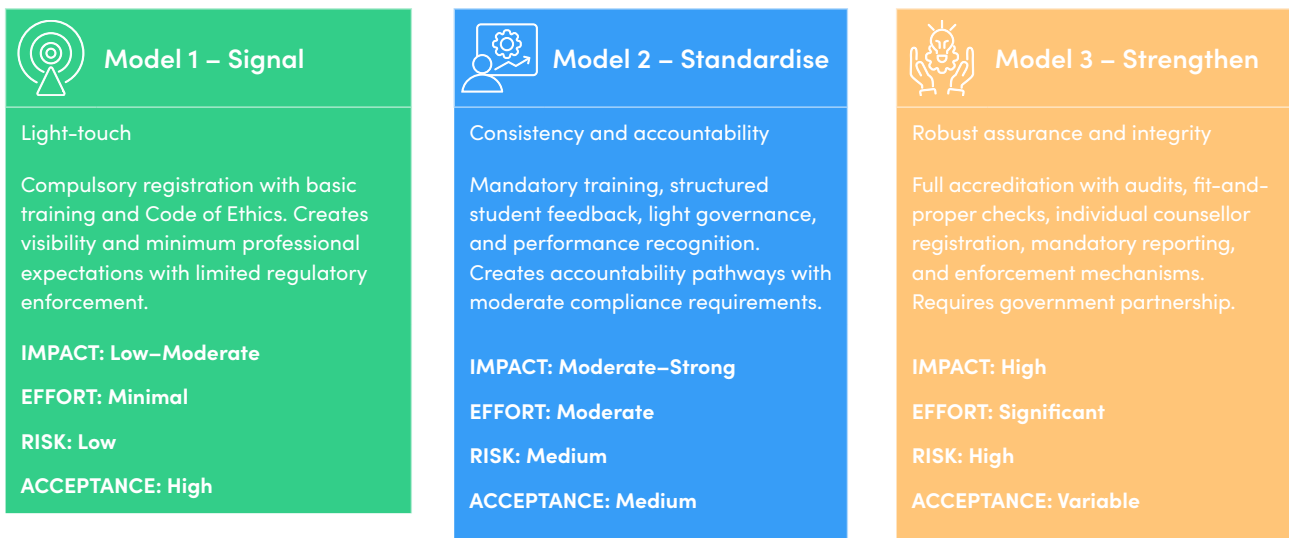


Figure 6: Example system component cascade diagram

This diagram shows how the models build on each other and could be rolled out progressively.



This section details the components of each proposed model.










Model 1 – Signal



Model 1 is a light-touch, sector-led approach designed to establish a visible baseline of agent quality. It focuses on basic registration, mandatory signing of and training in the Code of Ethics, and foundational training, creating an initial signal of professionalism without regulatory enforcement. This model sets the groundwork for broader uptake and sector engagement. The model raises visibility and expectations with limited compliance load. It does not eliminate bad practice, but reduces anonymity. The model includes the creation of an entity to manage the register.

In the following model outlines, any new body responsible for oversight, managing the agent register, or administering other functions is referred to as ‘the entity’, as its precise structure, governance and location have not yet been determined.

Table 1 Model 1 feature set by component and guiding principle mapping

Component	Feature	Guiding principles
 Registration	<p>Agency register</p> <ul style="list-style-type: none"> • Compulsory government-managed agent register established (e.g. within the Department of Education), underpinned by PRISMS data. • Baseline entry criteria introduced to verify identity, nominate an accountable person, and confirm agreement to minimum standards. • Registration provides a single source of truth for identifying agents working with Australian providers and improving transparency for students and the sector. • Register includes clear status categories (e.g. Pending Verification / Registered / Suspended or Removed) to support basic integrity and administrative control. • A detailed example of proposed registration and deregistration criteria and process is provided in Appendix A. <p>All other agent/institution requirements as per the National Code/ESOS</p>	<p>Practical and aligned</p> <p>Protects and promotes Australia’s reputation</p> <p>Encourages competition and innovation</p>
 Training	<p>Mandatory Code of Ethics training for accountable person</p> <ul style="list-style-type: none"> • A digital badge on completion <p>Voluntary Code of Ethics training for other staff</p> <ul style="list-style-type: none"> • A digital badge on completion <p>Voluntary training on important matters for students</p> <ul style="list-style-type: none"> • A suite of training modules is developed for topics such as: ethical counselling, living in Australia, budgeting, safety • Agents are encouraged to complete all modules and offered digital badges upon completion <p>Best practice guides for agents and institutions are developed and made publicly available</p> <p>‘Choosing an Agent’ guide for students/parents developed and made publicly available</p> <p>Access for all registered agents to professional development</p> <ul style="list-style-type: none"> • Programs offered by Austrade, IEAA (paid members), ECAA and other peak bodies 	<p>Practical and aligned</p> <p>Adaptable and responsive</p> <p>Eliminates bad practice and rewards good practice</p>

Component	Feature	Guiding principles
 <p>Provider obligations</p>	<p>Per current ESOS requirements</p> <p>No mandated additional reporting or audit requirements</p> <p>Encouraged to only work with agents on the register</p> <p>Encouraged to report concerns to the entity to record, but no formal investigation mechanism</p> <p>Declare on their website which of their agents are registered and which are not</p> <p>Provide advice to contracted agents on how to register and complete training</p> <ul style="list-style-type: none"> Providers are encouraged to integrate training as part of their internal onboarding <p>Contribute to best practice discussions</p>	<p>Practical and aligned</p>
 <p>Quality assurance/enforcement</p>	<p>No new enforcement powers beyond existing ESOS and National Code requirements.</p> <p>Administrative enforcement only (e.g. removal/suspension for failure to verify, sign Code, or complete training).</p> <p>Providers encouraged to cease working with agents who are not registered or fail to meet baseline requirements.</p> <p>Agents and providers encouraged to share concerns through existing sector forums and channels.</p> <p>Government maintains register integrity through clear rules, basic thresholds and due process for status changes.</p> <p>Best practice guides for agents and institutions</p>	<p>Practical and aligned</p>
 <p>Data and reporting</p>	<p>No additional requirement for providers for structured data reporting</p> <p>PRISMS training offered on reporting on agent performance</p>	<p>Protects and promotes Australia's reputation</p>
 <p>Governance</p>	<p>Register governance sits with government (potentially the Department of Education) to ensure credibility and consistency.</p> <ul style="list-style-type: none"> Providers support implementation through data submission and maintaining accurate agent records. Ongoing sector consultation to keep requirements practical and aligned with market realities 	<p>Practical and aligned</p> <p>Adaptable and responsive</p>
 <p>Student voice</p>	<p>Basic sentiment monitoring</p> <ul style="list-style-type: none"> Captured via the existing Student Sentiment Survey but could add specific questions on agents Feedback aggregated to identify sector-wide trends <p>'Choosing an Agent' guide for students/parents developed with input from students</p> <p>Providers are encouraged to refer students to existing information</p> <p>Student representatives included in agent quality discussions</p>	<p>Students at the centre</p> <p>Adaptable and responsive</p>



Component	Feature	Guiding principles
 Recognition and reward	<p>Listing on the register</p> <p>Certificate of registration</p> <p>Access to sector-endorsed training badges that can be displayed in marketing materials</p>	<p>Eliminates bad practice and rewards good practice</p> <p>Protects and promotes Australia's reputation</p>
 Communication and advocacy	<p>Registered agents included in outbound communications from Austrade and other peak bodies</p> <p>ARG maintained and consulted throughout the model development and testing process</p>	<p>Adaptable and responsive</p>










Model 2 – Standardise

Model 2 builds on Model 1 by improving consistency and professionalism at scale and introduces more accountability. It includes additional training, more structured student feedback and strengthened governance, creating greater assurance and accountability across the agent network.

Table 2 Model 2 feature set by component and guiding principle mapping

Component	Feature	Guiding principles
 Registration	<p>Agency register</p> <ul style="list-style-type: none"> Mandatory government-managed register continues, with strengthened criteria and more consistent national requirements. Enhanced registration conditions introduced (e.g. structured training requirements, provider reporting expectations, and agreed minimum conduct standards). Defined pathways for suspension or deregistration support consistent sector-wide consequences for non-compliance. <p>Re-registration required every two years</p> <p>Register is searchable and publicly available</p> <p>Agreement to data and feedback participation</p> <ul style="list-style-type: none"> Agencies must agree to data sharing Agencies must agree to meaningful participation in student feedback mechanisms 	Eliminates bad practice and rewards good practice
 Training	<p>Pre-departure student orientation requirement</p> <ul style="list-style-type: none"> Agents must ensure all students complete a standardised pre-departure briefing on study expectations, visa conditions and support services before travel <p>Training courses in Model 1 are mandatory for all accountable persons</p> <p>Additional modules are added covering:</p> <ul style="list-style-type: none"> Student safeguarding Mental health awareness, financial vulnerability, cultural adjustment and referral pathways. Australian workplace standards <p>Registered agents get access to CPD training offered by the sector</p>	Students at the centre Eliminates bad practice and rewards good practice Adaptable and responsive

Component	Feature	Guiding principles
 <p>Provider obligations</p>	<p>Mandatory participation in the agent register</p> <ul style="list-style-type: none"> Providers can only work with agents on the register <p>Mandatory high-level reporting to the register on terminations</p> <ul style="list-style-type: none"> No requirement for evidence submission <p>Encourage agents to complete basic training</p> <ul style="list-style-type: none"> Providers promote (but are not required to enforce) completion of the sector’s basic agent training module Providers encouraged to work only with agencies with 50% or more trained counsellors <p>Voluntary participation in sector-led community of practice</p> <ul style="list-style-type: none"> Providers are encouraged to attend briefings, contribute to best practice discussions, or receive updates from the entity Participation is optional and aims at sector uplift 	<p>Practical and aligned</p> <p>Adaptable and responsive</p>
 <p>Quality assurance/enforcement</p>	<p>A structured QA pathway managed through the register (warning → remediation → suspension → de-registration).</p> <ul style="list-style-type: none"> Evidence informed by provider reporting, PRISMS-linked signals and student feedback mechanisms (where included). Focuses on repeated or serious non-compliance rather than minor issues. Government continues to enforce provider obligations through existing ESOS/National Code settings. 	<p>Eliminates bad practice and rewards good practice</p> <p>Protects and promotes Australia’s reputation</p>
 <p>Data and reporting</p>	<p>List of registered agents searchable by providers</p> <p>Agent ID mandatory on all CoEs</p> <p>Extend PRISMS agent performance reports</p> <ul style="list-style-type: none"> Reports go further to provide benchmarked reports on individual agents <p>Providers may voluntarily contribute:</p> <ul style="list-style-type: none"> general observations about agent performance (non-specific, non-sensitive) insights to support the sector’s continuous improvement <p>Feedback mechanism for agents on provider performance</p>	<p>Protects and promotes Australia’s reputation</p> <p>Practical and aligned</p>
 <p>Governance</p>	<p>Compulsory register remains government-managed, with stronger operating procedures and consistent national settings.</p> <p>Formalised sector advisory arrangements to support ongoing refinement of criteria, training and reporting.</p> <ul style="list-style-type: none"> Structured coordination between government, providers and peak bodies to support implementation and consistency. Clear roles and responsibilities across stakeholders, particularly provider obligations and reporting expectations. Governance supports national standardisation without creating new legislative enforcement mechanisms for agents. 	<p>Practical and aligned</p> <p>Adaptable and responsive</p>





Component	Feature	Guiding principles
 Student voice	<p>Entity-hosted student feedback link – optional</p> <ul style="list-style-type: none"> • A simple, central student feedback form • Students can provide comments about their experience with an agent at any time in their student journey • Feedback is aggregated to identify sector-wide trends but not used for compliance • Feedback is used to help shape training materials, guidance materials and future improvements to the mode <p>Entity-hosted exit survey – optional</p> <ul style="list-style-type: none"> • Short, online surveys for students who withdraw, have visas cancelled or claim TPS. These surveys will be templated to capture information about the agent's role in the international student journey and the quality of service 	<p>Students at the centre</p> <p>Protects and promotes Australia's reputation</p>
 Recognition and reward	<p>Recognition by the entity for agents who participate actively in training, demonstrate good student feedback or meet performance expectations.</p> <p>Opportunities for agents to participate in sector events, pilot programs or highlighted good-practice case studies</p>	<p>Eliminates bad practice and rewards good practice</p> <p>Encourages competition and innovation</p>
 Communication and advocacy	<p>Coordinated outbound communications to all agents on register</p> <ul style="list-style-type: none"> • Monthly emails to agents for important policy updates • Invitations to policy update webinars and in-country info sessions run by Austrade, EACC, and others. • Agents linked to newsfeed from PRISMS – important alerts to ensure timely information flow <p>Establish a Whatsapp group for registered agents to encourage networking and exchange of trends and ideas</p>	<p>Adaptable and responsive</p>



Model 3 – Strengthen

Table 3 Model 3 feature set by component and guiding principle mapping

Component	Feature	Guiding principles
 Registration	<p>Stronger entry and renewal requirements apply, including more robust verification and ongoing compliance expectations.</p> <p>Registration integrates risk-based monitoring and intelligence</p> <p>Individual counsellors are listed on the register</p> <ul style="list-style-type: none"> • A public, searchable database of individual counsellors within registered agencies, showing current status and training credentials. <p>Agents must declare sub-agents</p> <ul style="list-style-type: none"> • A requirement for master agents to declare all sub-agents within the register. Master agents assume full accountability for the conduct of their sub-agents. 	<p>Students at the centre</p> <p>Protects and promotes Australia's reputation</p> <p>Encourages competition and innovation</p> <p>Eliminates bad practice and rewards good practice</p>
 Training	<p>Training courses in Models 1 and 2 are mandatory for all relevant staff and must be completed every two years</p> <p>The accountable person of each agency is responsible for ensuring training of all staff is complete and up to date</p> <p>Ongoing registration is contingent on having 75% of all staff training up to date</p> <p>Optional modules are published that cover more specialised areas such as 'recruiting to the VET sector', 'equality, diversity and inclusion', and so forth.</p>	<p>Eliminates bad practice and rewards good practice</p> <p>Adaptable and responsive</p> <p>Students at the centre</p>
 Provider obligations	<p>Standardised clauses for all institutional agent agreements, reducing variation and legal ambiguity</p> <p>Providers must upload agent contracts to a central repository, allowing for consistent oversight, transparency and quality assurance across the sector</p>	<p>Students at the centre</p> <p>Practical and aligned</p> <p>Eliminates bad practice and rewards good practice</p>
 Quality assurance/enforcement	<p>Formal investigation and compliance review processes for serious integrity concerns.</p> <ul style="list-style-type: none"> • Targeted audits/spot checks using risk-based thresholds and trend monitoring. • Tiered sanctions framework including probation/conditional registration, suspension, deregistration and re-entry rules. • Stronger public register transparency (e.g. status visibility) to support deterrence and market discipline. 	
 Data and reporting	<p>List of registered agents searchable for providers and students</p> <ul style="list-style-type: none"> • Including the status of registration (for example, active, suspended, cancelled) <p>Centralised Data Exchange Platform</p> <ul style="list-style-type: none"> • Integrated platform connecting PRISMS, TEQSA, ASQA and Home Affairs data to monitor agent performance, visa outcomes and student success metrics <p>Public Annual Sector Scorecard</p> <ul style="list-style-type: none"> • Public annual report showing agent performance, visa approvals, completions, risk distribution, complaints and student satisfaction 	<p>Protects reputation</p> <p>Practical and aligned</p> <p>Students at the centre</p>

Component	Feature	Guiding principles
 Governance	<p>Government-led governance with defined oversight capability and stronger integrity settings.</p> <ul style="list-style-type: none"> Formal QA function established (or designated) to manage monitoring, investigations and escalation processes. Independent review/appeal pathway to ensure procedural fairness and credibility of decisions. Stronger data governance, transparency settings and cross-agency coordination where required. Clear accountability mechanisms for both agents (through registration status) and providers (through ESOS enforcement). 	<p>Eliminates bad practice and rewards good practice</p> <p>Protects and promotes Australia's reputation</p>
 Student voice	<p>Mandatory entity-hosted student feedback link</p> <p>Mandatory entity-hosted exit survey</p> <p>Student feedback collection system</p> <ul style="list-style-type: none"> Multi-touchpoint, anonymous student feedback on agent performance collected at pre-departure, post-arrival and post-first semester. Ensures students' lived experiences inform recognition decisions. Results feed into the agent performance scorecard and recognition and reward scheme. <p>Student complaint triage protocol</p> <ul style="list-style-type: none"> Web and phone channels with multilingual support. Case tracking and quarterly publication of anonymised themes. 	<p>Students at the centre</p> <p>Protects and promotes Australia's reputation</p> <p>Eliminates bad practice and rewards good practice</p>
 Recognition and reward	<p>Sector-led awards program</p> <p>Sector-led mentoring program</p>	<p>Eliminates bad practice and rewards good practice</p> <p>Practical and aligned</p>
 Communication and advocacy	<p>Rapid-response policy update service</p> <ul style="list-style-type: none"> Centralised multi-channel notification system pushing verified policy and visa updates to all registered agents, ensuring consistent, real time advice across markets <p>Agent peer support network</p> <ul style="list-style-type: none"> A structured, sector-facilitated network where experienced agents contribute to training and case-study sharing for emerging agencies, strengthening professionalism without direct competitive evaluation 	<p>Students at the centre</p> <p>Practical and aligned</p>

Comparative risk assessment of proposed models

Table 4 presents a comparative assessment of the three models, highlighting how each responds to different levels of integrity, and reputational and student risk. The table is intended to illustrate trade offs in assurance, burden and impact, rather than to indicate a preferred or sequential pathway.

Table 4

	Model 1 Signal	Model 2 Standardise	Model 3 Strengthen
Purpose	Establish a universal baseline of professional expectations without heavy compliance requirements	Introduce sector-wide consistency, complaints handling, and performance recognition	Provide a high level of assurance, integrity protection and risk management – potentially aligned with government
Rationale	Creates a shared minimum expectation with minimal burden, signalling professionalism and change but without policing or investigation functions	Enables meaningful accountability without the cost or burden of formal audits. Strengthens behaviour through transparency, recognition and consistent expectations across providers	Provides robust assurance, driven by evidence, monitoring and meaningful consequences – appropriate for a model aimed at integrity and market protection
Stakeholder acceptance	High – Low burden and easy adoption for providers and agents	Medium – Requires moderate process change; higher provider and agent involvement	Variable – Some pushback likely from providers and agents; depends on government role and anticipated effectiveness in solving the problem
Student benefit	Improved visibility of who is registered and trained; consistent minimum advice standards	Greater transparency, clearer accountability pathways and improved overall service quality	Highest level of consumer protection; strong safeguards against misinformation and poor practice
Dependencies/enablers	Simple digital register; basic training module; Code of Ethics; voluntary sector participation	Sector governance body; data inputs from providers and pledges	Registration infrastructure; audit capability; robust data systems; government engagement
Government role	Model 1 - Register administration	Model 2 - Register administration + oversight	Model 3 - Register administration + formal QA partnership
Integrity protection	Low – Relies mostly on voluntary compliance	Moderate – Code, complaints and recognition introduce behavioural incentives	High – Audits, reporting and consequences provide substantive integrity protection

Establishing an agent register

While this report does not seek to define detailed implementation arrangements, an indicative, phased approach to establishing an agent register is outlined below to demonstrate how registration could be introduced in a practical and low-risk manner. Since all agents who have ever lodged an eCOE are recorded in PRISMS, PRISMS as the starting point for the data capture is the most obvious. Further, since agent performance is partially measured by visa success, having a direct link between the register and PRISMS is essential.

Appendix A outlines some of the elements that may be included as criteria for registration and also for deregistration.

Phase 1: PRISMS data clean (months 1–3)

PRISMS already contains every agent who has ever requested an eCOE. However, the set up of PRISMS has allowed some agents to have multiple records and for the inconsistent recording of agent locations and staff. A first step would be to re-design and finalise the data structure of agencies, their locations and staff. The next step would be to use a tech team and/or AI to fit the current data into the agreed data structure as best as possible

Phase 2: Agent verification (months 3–6)

Agents appearing in the updated PRISMS data structure, are notified and invited to claim and verify their record in order to become both correctly recorded on PRISMS and part of the new register. As part of this process, each agency nominates an accountable individual, formally agrees to the Code of Ethics, and completes the required baseline training. A unique agent identifier is issued only once verification is complete, avoiding uncontrolled duplication and ensuring each registered entity is clearly identifiable. Depending on the data structure used, and upon the decision of the sector as to how comprehensive the register should be, further sub-codes could be issued for agencies' locations and staff.

This approach allows the register to be established efficiently and accurately, while minimising disruption. It also creates an unbreakable link between the register and PRISMS ensuring potential reporting of agents' success metrics throughout the sector, to government departments and potentially to prospective students is accurate.

Towards a best practice model

In addition to the three proposed models, a number of initiatives were considered that could further enhance agent quality beyond the core framework. These options represent best practice approaches and have the potential to set Australia apart globally, but they are more resource-intensive and complex, and therefore not recommended as initial steps. We have included them in this report to provide a view of what could be achievable in the future. Where appropriate, each of these ideas could be incorporated into one of the three models as they evolve, offering opportunities to strengthen oversight, accountability and student-centred practice over time.

Accreditation versus registration

While a system accreditation goes further in ensuring that agents are verified, not just identified, it is a more labour-intensive approach and should only be considered once a system of registration has been implemented and tested. Accreditation goes beyond the 'gatekeeping' role of registration, and introduces a formal assessment or audit (sector-led or joint governance) to verify that an agent not only meets standards on paper but also demonstrates ongoing high-quality performance, ethical conduct and student-centred practices.

Purpose: Accreditation is a stronger signal of quality to students, providers and government, and carries greater credibility because it involves independent verification, not self-attestation. Agents can use accreditation to differentiate themselves in competitive markets – particularly valuable in countries where quality concerns persist.

Tiered accreditation scheme (agency-level)

A three-tier accreditation system provides a clear, progressive pathway for agencies to demonstrate quality beyond baseline compliance. All agencies that meet the minimum requirements to join the Agency Register enter the scheme at Bronze, ensuring the system remains accessible and inclusive while establishing a consistent national floor for agency practice.

Agencies that show performance above baseline indicators (for example, lower-than-average visa refusal rates, and stronger conversion and completion outcomes) are eligible for Silver accreditation. This tier recognises agencies whose performance exceeds routine expectations and who contribute positively to student outcomes and provider efficiency.

The highest tier, Gold, is reserved for agencies that demonstrate sustained sector-leading practice over multiple years. Gold agencies consistently meet or exceed stringent performance benchmarks, receive strong and verifiable student feedback, show exemplary compliance behaviour and may voluntarily undergo peer review or external validation.

The exact criteria required to move through the tiers will be agreed and set by the sector-led coordinating body. Criteria can be changed from year to year and according to the market.

Transparent criteria and sector-wide visibility of accreditation status will create a strong reputational differentiation across the tiers. The scheme rewards continuous improvement, highlights excellence in the marketplace, and provides clearer decision-making signals for both students and providers.

Purpose: Gives high-performing agencies a visible market advantage, supports providers in making evidence-based partnership decisions and helps students identify reputable, reliable agencies. Ultimately, the scheme lifts overall standards while rewarding those who invest in quality practice.

Sandbox accreditation scheme

Providing a time-limited provisional licence for new agencies or those using new technology (for example, AI-led counselling) allows the model to test innovative models under enhanced supervision.

- There would be a 12-month provisional accreditation period. If no serious issues arise, the sector-led coordinating body can approve the agency to progress to standard accreditation.
- Provisional license can be extended for an additional 12-month period with capped enrolments and close monitoring (mystery shopping, student feedback, institution feedback, data from visa approvals, enrolments, retention)
- Student consent is required for agents on the provisional licence (for instance, students must be made aware that the agent is on a provisional accreditation pathway). Evaluation from the sector-led coordinating body informs future accreditation.

Purpose: To enable innovation in agent business models while managing risk, by allowing new or technology-enabled agencies to operate under enhanced supervision before progressing to full accreditation.

Joint TEQSA–Home Affairs risk ratings

Quarterly joint data exchanges between TEQSA and Home Affairs identify anomalies and emerging trends. A joint TEQSA–Home Affairs risk intelligence system that profiles agent–provider relationships could provide an early warning alarm of integrity risks. A unified risk system triggers audits or warnings that must then be reviewed at Regular cross-agency meetings to review cases. Formal accountability remains with providers, who must act on the intelligence.

Purpose: To give regulators and institutions early warning of integrity risks.

Commission disclosure requirement

Agents must disclose to students that there is a financial, commission-based agreement between them and their contracted providers before agent–student contracts are signed, ensuring transparency and informed decision-making. Agents would not be expected to declare the exact amount of commission.

A standard commission disclosure template signed by students and verified by institutions should be submitted with other application documents. Disclosure details could be included with offer letters and need to be signed as part of the acceptance process. This would allow students to compare offers from institutions more objectively.

Continued non-compliance results in removal from the agent register. Disclosure documents should include the services that the agent will provide to the student for no extra cost.

Purpose: To improve transparency and student confidence by ensuring students understand the existence of commission-based relationships before committing, without imposing unnecessary complexity on agents or institutions.

International education commissioner

This could be a statutory appointment and function as a coordinating mechanism for better communication and alignment between the various government departments, peak bodies and the new entity.

Purpose: To strengthen system-wide coordination, accountability and strategic alignment across international education policy, regulation and sector practice.

Conclusion

Australia's international education sector is at a pivotal moment. The evidence gathered through this project – across literature, data analysis, interviews, focus groups and extensive sector consultation – shows strong alignment on the need to lift transparency, consistency and accountability in education agent practice. While stakeholders hold differing views on the preferred mechanism, the sector is unified in its desire to strengthen integrity, support high-performing agents, and ensure students receive accurate, ethical and student-centred advice. This provides a solid foundation for progressing a practical, scalable and sector-led quality framework.

The three models outlined in this report – Signal, Standardise and Strengthen – offer progressively stronger pathways to achieve this. They provide IEAA and the sector with a clear set of building blocks that can be adapted to policy appetite, implementation readiness, and the level of assurance required by government and the community. Regardless of which model is ultimately pursued, the components presented here create an actionable roadmap: improving agent visibility, setting clear expectations, sharing data more effectively and supporting better decision-making for students and providers.

The next step is to move from analysis to coordinated action. IEAA is now well positioned to engage with government, peak bodies and providers to refine a preferred option, test implementation requirements, and determine the most feasible governance and funding arrangements for the entity that would oversee new functions. By advancing this work in partnership with the sector, Australia can deliver a quality framework that is credible, achievable and future-focused – ultimately strengthening trust in the system and reinforcing Australia's position as a world-leading destination for international education.

Appendix A

Registration and deregistration criteria for an agent register

The registration and deregistration criteria set out below are provided by Edified as illustrative examples only, to support discussion and further consideration by the IEAA Steering Committee. They are not intended to represent final or exhaustive requirements. Developing a fully operational register—including final criteria, governance arrangements, resourcing implications, and implementation pathways—would require detailed investigation, consultation, and planning. The intent of this material is to demonstrate the types of elements that could form part of a future framework, rather than to prescribe a definitive model.

Registration and deregistration operate as a single, integrated quality assurance mechanism within the proposed agent quality framework. Mandatory registration through a government-managed register establishes clear entry requirements, baseline transparency, and ongoing obligations for all agents working with Australian education providers. Deregistration provides the corresponding accountability mechanism, allowing registration status to be suspended or removed where agents fail to meet these requirements or engage in conduct that undermines student welfare or system integrity. Together, these processes enable proportionate, evidence-based responses that escalate across the three models—from administrative controls in Model 1 to structured quality assurance pathways in Model 2 and high-assurance enforcement in Model 3—ensuring fairness, consistency and credibility while supporting Australia's broader regulatory framework under ESOS and the National Code.

Example registration criteria – Models 1, 2 and 3

Purpose: This document sets out the proposed agent registration requirements across all three models. Registration is mandatory in all models and administered through a government-managed register. Requirements increase in depth, assurance and ongoing obligations from Model 1 (Signal) through to Model 3 (Strengthen).

Model 1 – Signal

- Mandatory registration on a government-managed agent register (e.g. within the Department of Education).
- Verification of legal business identity, trading name(s), country of operation and contact details.
- Nomination of an accountable person responsible for agent conduct and compliance.
- Agreement to a Code of Ethics and minimum standards of conduct.
- Completion of mandatory baseline training.
- Administrative suspension or deregistration for failure to maintain baseline requirements.
- A detailed example of registration and deregistration criteria and processes is provided in Appendix 1.

Model 2 – Standardise

- All Model 1 registration requirements must be met and maintained.
- Completion of enhanced, role-specific training for counsellors and managers, refreshed at defined intervals.
- Formal declaration of any sub-agent arrangements, including accountability for oversight and conduct.
- Participation in structured data reporting and performance monitoring, including PRISMS-linked indicators.
- Acceptance of graduated quality assurance actions linked to registration conditions.
- Clear linkage between registration status and provider engagement expectations.

Model 3 – Strengthen

- All Model 2 registration requirements must be met and maintained.
- Stronger verification of ownership, governance structures and business controls.
- Participation in periodic re-verification, reviews or risk-based audits.
- Demonstrated history of ethical practice, student-centred outcomes and compliance.
- Full participation in student feedback, transparency and data-sharing mechanisms.
- Acceptance of formal investigation, audit and sanction processes, including public status changes where appropriate.

Example deregistration framework – Models 1, 2 and 3

Model 1 – Signal

- Deregistration limited to administrative non-compliance with registration conditions (e.g. failure to verify details, complete baseline training, or maintain acceptance of the Code of Ethics).
- No misconduct-based investigations conducted through the register.
- Integrity concerns addressed indirectly through provider actions and existing ESOS and National Code enforcement.
- Register status outcomes limited to Pending, Registered or Deregistered for administrative reasons.

Model 2 – Standardise

- Deregistration triggered by repeated breaches of registration conditions or substantiated integrity concerns.
- Structured escalation pathway managed through the government-administered register: warning → remediation plan → suspension → deregistration.
- Evidence informed by provider reporting, PRISMS-linked performance indicators and student feedback mechanisms.
- Formal notice to agents with clear timeframes to respond and remedy issues.
- Providers notified of registration status changes to support consistent sector-wide consequences.

Model 3 – Strengthen

- Formal investigation processes led by government or a delegated quality assurance function.
- Risk-based audits, spot checks and enhanced data verification.
- Tiered sanctions framework including probation or conditional registration, suspension, deregistration and defined re-entry restrictions.
- Public visibility of registration status where appropriate to support transparency and deterrence.
- Independent review or appeal mechanisms to ensure procedural fairness and credibility of decisions.

Appendix B

Agent performance data on PRISMS

PRISMS currently captures rich data on both agents and providers. While the interface is not intuitive, the data could be better structured and extracting some information requires merging of different reports, nonetheless it's possible for providers to see very detailed metrics about their agents, their prospective agents and about their competitors and their agents.

The kind of data about agents included in PRISMS is:

- Number of eCOEs
- Number of eCOEs all providers
- Number of transfer eCOEs
- Number of provider decision eCOEs
- Number of non-compliance eCOEs
- Number of deferment eCOEs
- Number of non-commencement eCOEs
- Total number of incomplete eCOEs
- Percent transfer
- Percent provider decision
- Percent non-compliance
- Percent deferment
- Percent non-commencement
- Incompletion percent
- Completion rate
- Completion rate for all providers
- Earliest eCOE create date
- Recent eCOE create date

It does not appear to include:

- Visa rejection rates
- From where, to where a student is transferred
- Commission payments
- eCOE request to visa lodgement timelines

The addition of rejection rates and transfer details would be very welcome. The addition of commission payments and lodgement times would be a nice to have, and with regards to commissions, would need the support of the sector

Company profile

Edified is a specialised consulting firm focused exclusively on the education industry.

Working across Australia, NZ, the UK, and North America, our team is driven by a belief in the power of education to change lives. We help education providers and government bodies solve challenges in marketing and recruitment, admissions, pricing and student experience.

Our clients say that Edified 'gets them' like no-one else does. All our people have held senior roles in education institutions, so we understand the nuances and opportunities of the sector.

We'll help untangle your most complex problems and unearth insights that give you the confidence and clarity to take action.



Our aspiration

To be the education sector's favourite consulting firm

Our values

Integrity, respect, excellence, inclusivity, happiness

Social responsibility

- Edified is committed to making the world a better place to live in:
- We carbon offset any travel associated with the delivery of this document.
- All of our print work is done on FSC paper and we only use eco inks.

Every year we co-fund and run a grants program called Energiser to support students and recent graduates around the world to deliver innovative programs to improve education in their communities.

Edified acknowledges the Traditional Custodians of Country throughout Australia and their connections to land, sea and community. We pay our respect to their Elders past and present and extend that respect to all Aboriginal and Torres Strait Islander peoples today.

Edified is a place free from discrimination, where everyone belongs. We respect and celebrate the diversity of our communities, including people of all cultural and faith backgrounds, classes, gender or sexual identities, ages and abilities and we are committed to being a safe and welcoming space for all.

Wurundjeri Country, 820 Lygon Street,
Carlton North, Melbourne, VIC 3054, Australia

T +61 438 900 244 | E mark@edified.com.au
ABN 68 6232 959 56 | ACN 623 295 956
www.edified.com.au

