

KOI Education Agent Code of Conduct

Version: 17 July 2026

Introduction

The KOI Education Agent Code of Conduct is designed to ensure that all Education Agents representing King's Own Institute (KOI) adhere to the highest standards of ethical behaviour, professionalism, transparency and integrity. The Code reflects KOI's obligations under the Education Services for Overseas Students Act 2000 (ESOS Act), the National Code of Practice for Providers of Education and Training to Overseas Students 2018, including Standard 4 - Education Agents, and subsequent legislative amendments relating to Education Agents and Education Agent commissions.

It establishes expectations for ethical student recruitment, transparency of Education Agent, sub-agent and third-party arrangements, appropriate management of student transfers, and compliance with legislative restrictions and prohibitions on Education Agent commissions, including the prohibition on commissions for the recruitment of transferring overseas students.

Ethical Framework

Education agents must adhere to the following ethical principles:

Integrity	Be straightforward and honest in all professional and business dealings.
Objectivity	Ensure professional judgment is not compromised by bias or conflict of interest.
Professional Competence and Due Care	Maintain professional knowledge and diligence in service
Transparency	Declare conflicts of interest and ensure transparency in dealings
Confidentiality	Respect and preserve the confidentiality of personal information
Professional Behaviour	Act in accordance with ESOS Act, the National Code, relevant laws and regulations
Professionalism and Purpose	Act in a manner that serves the interests of clients and society.

Principles

1. Practice Responsible Business Ethics

- Avoid conflicts of interest.
- Observe confidentiality and transparency.
- Act professionally, honestly, and responsibly.
- Refrain from engaging in fraudulent visa applications.
- Act in the best interests of students.
- Declare conflicts of interest.
- Be transparent about fees and commissions.
- Provide clear avenues for handling complaints and resolving disputes.
- Comply with the ESOS Act, the National Code, relevant laws and regulations.

- 2. Provide Current, Accurate, and Honest Information**
 - Tailor information to individual student circumstances.
 - Specify student rights and responsibilities.
 - Avoid false claims of government endorsement.
 - Use approved material when promoting providers.
 - Avoid encouraging inappropriate transfers between providers.
- 3. Develop Transparent Business Relationships**
 - Sign agreements between the student, agent, and provider.
 - Detail arrangements, payment schedules, and refund policies.
 - Archive agreements appropriately.
- 4. Disclosure of Sub-Agents and any Third-Party arrangements**
 - Education Agents must fully disclose to KOI all sub-agents, contractors, representatives, branch offices and other third parties undertaking KOI Education Agent activities in Australia or overseas, and promptly notify KOI of any change to these arrangements. Education Agents must not engage an undisclosed third party to undertake KOI-related recruitment or student transfer activities
- 5. Provide Up-to-Date Information for Informed Choices**
 - Provide information on accreditations, training, and memberships.
 - Support comparison of qualifications and experience.
- 6. Act Professionally**
 - Participate in training and professional development.
 - Join professional associations that promote best practices.
- 7. Raise Ethical Standards and Best Practices**
 - Share best practices in recruiting international students.

Key Requirements

- 1. Written Agreements:**

Registered providers must have a written agreement with each education agent and maintain the education agent's details in PRISMS. The agreement should outline responsibilities, monitoring processes, corrective actions, and grounds for termination.
- 2. Immediate Corrective Actions:**

Providers must take immediate corrective action if an education agent or their subcontractor fails to comply with the required standards. The corrective actions must be implemented without delay and may include additional training, formal warnings, suspension, or termination of the education agency agreement.
- 3. Transparency and Accountability:**

Providers must ensure education agents avoid conflicts of interest and declare them. Education agents must also observe confidentiality and transparency in their dealings with students.
- 4. Compliance and Monitoring:**

Providers must ensure education agents have appropriate knowledge of the Australian education system and the International Education and Training Agent Code of Ethics. Regular training and up-to-date marketing information must be provided.
- 5. Ethical Recruitment:**

Providers must not accept students from education agents engaging in dishonest or misleading practices, including providing unauthorised migration advice or recruiting non-bona fide students; engaging in dishonest, deceptive, or misleading recruitment practices; encouraging or facilitates enrolment of students who are unlikely to comply with their student visa conditions.
- 6. Education Agent Commission Restrictions**

KOI complies with the National Code requirements regarding education agent commissions. KOI will not pay education agent commissions for recruiting an overseas student who has already commenced studying in a

course with another registered provider, unless one of the permitted exceptions under the National Code applies. A commission may only be paid where the recruited student:

- became an accepted student of KOI on or before 31 March 2026; or
- is enrolling in the courses specified on the Confirmation of Enrolment (CoE) for which the student's visa was granted; or
- commences a KOI course only after completing their principal course of study with the previous registered provider.

Education agents must not encourage or promote student transfers primarily for the purpose of earning commission or financial benefit. All student recruitment must comply with the ESOS Act and the National Code Standard 4. This prohibition applies regardless of whether the recruitment or transfer activity is undertaken directly by the Education Agent or through a sub-agent, representative, contractor, associate or other third-party arrangement.

7. Transparency and Reporting:

KOI must maintain and publish an up-to-date list of all Education Agents, including sub-agents who meet the activity-based definition, and must report Education Agent details in PRISMS whenever the Education Agent facilitates enrolment. KOI keeps records of commissions paid to each Education Agent, including monetary and non-monetary benefits, and provides this information to the Secretary of the Department of Education upon request. Education Agents must cooperate fully with these obligations, and any information provided for PRISMS reporting must be complete, accurate, and not misleading; providing false or incomplete information is a serious breach of the Education Agent Agreement. Education Agents must provide KOI with complete and current information regarding all persons or entities undertaking KOI Education Agent activities on their behalf and must immediately notify KOI of any new, changed or ceased sub-agent or third-party arrangement.

8. Marketing and Promotional Materials:

Education Agents may only use marketing and promotional materials that have been approved by KOI. Agents must provide accurate, complete and current information about courses, fees, entry requirements and living in Australia; must not make false or misleading claims regarding migration outcomes, employment opportunities or course recognition; and must not engage in high-pressure or unethical recruitment practices. KOI periodically reviews agent-generated materials to ensure ongoing compliance.

9. Commissions and Prohibited Payments:

Commission arrangements with Education Agents are subject to heightened regulatory scrutiny under the ESOS Act, the National Code, and the Education Legislation Amendment (Integrity and Other Measures) Act 2025. KOI will only pay Education Agent commissions where the payment is permitted under the ESOS Act, National Code and applicable KOI commission requirements. KOI strictly prohibits the payment of commissions or any other benefit in connection with the transfer of an overseas student between registered providers within Australia, or any activity intended to induce or facilitate a student transfer, contrary to Standard 7 of the National Code. Education Agents must not structure or disguise commissions - including through marketing fees, service charges, sub-agents, or third-party arrangements - to avoid regulatory requirements, and all commissions and benefits must be fully disclosed, documented, and capable of being reported in accordance with KOI's regulatory obligations. Non-compliance with this section is a material breach and may result in immediate suspension or termination of the Education Agent, and notification to relevant authorities.

Implementation and Monitoring

KOI will regularly review and monitor the activities of education agents to ensure compliance with this Code of Conduct. This includes:

- Conducting regular training and updates for agents as per the [KOI Education Agent Management Policy](#)
- Implementing feedback mechanisms for students to report unethical practices.
- Reviewing and updating agreements with education agents to reflect current standards and practices.
- Reviewing digital media platforms (e.g., Websites, Facebook, Instagram, LinkedIn, Youtube and Google).
- Monitoring commission arrangements, PRISMS reporting, and agent-generated marketing materials to ensure ongoing compliance with KOI's transparency, reporting, and commission obligations.
- Verifying declared sub-agent and third-party arrangements against student recruitment information, student feedback and other KOI records, and investigating any identified inconsistencies or undeclared arrangements.

Conclusion

By adhering to this Code of Conduct, Education Agents representing KOI will ensure they act in the best interests of students and maintain the integrity and reputation of Australia's international education sector. This commitment to ethical practices will enhance the trust and confidence of students, education providers, and stakeholders in the services provided by KOI.

Declaration

I, the undersigned, as the principal Education Agent or a nominated officer, hereby declare that I have read, acknowledged, and accepted the KOI Education Agents Code of Conduct (V 17 July 2026). I understand and agree to adhere to the ethical principles, key requirements, and professional standards outlined in this document.

Full Name:

Education Agency Name:

Signature:

Date:

For any inquiries or further assistance regarding this Code of Conduct, please contact the KOI Marketing at marketing@koi.edu.au