

ICL CODE OF PRACTICE SELF- ASSESSMENT AND REVIEW REPORT

2024

Introduction

At ICL, we are committed to maintaining a high standard of educational practice, ensuring the safety, well-being, and academic success of all our students. Our continuous efforts to align with the New Zealand Qualifications Authority (NZQA) and the Code of Practice for the Pastoral Care of International Students are reflected in our adherence to the various outcomes outlined in this document.

Through a series of comprehensive policies, procedures, and practices, we prioritise clear communication, rigorous support systems, and a proactive approach to student engagement and welfare. Each outcome is designed to address specific areas of student experience, from the application process and orientation to ongoing academic support, safety, and grievance management.

We also place significant emphasis on ensuring that all processes are compliant with relevant regulations and best practices, such as those related to immigration, complaints, withdrawals, and under-18 student care. Our efforts are rooted in fostering a respectful and inclusive environment where students, staff, and stakeholders are fully informed and supported at every stage of the educational journey.

This report highlights our commitment to these values through a detailed review of each outcome, demonstrating our ongoing dedication to quality, compliance, and continuous improvement.



Marketing and Promotion

Compliance Status: Compliant

Compliance Details:

Significant progress has been made in alignment with our previously established action plan. Below are the key achievements to date:

a. Website Renovation and Launch:

Four websites have been successfully renovated and launched, significantly improving user experience and navigation:

- [ICL Graduate Business School](#)
- [Auckland English Academy](#)
- [Bridge International College](#)
- [ICL Education Group](#)

b. Updated Price Lists and Promotional Materials:

Price lists and flyers are regularly updated to ensure they reflect the latest information.

c. Monthly Activity Calendar:

A comprehensive monthly activity calendar has been developed to keep students informed of events and engagement opportunities.

d. Digital Screens:

Digital screens have been installed and are regularly updated with timely information for students.

e. Marketing Collaterals:

All promotional materials—including prospectuses, intake dates, fee schedules, and new programme information—are routinely reviewed and updated. A standardised template ensures consistency across all formats.

f. Marketing and Communication Specialist Role:

A dedicated role has been created to enhance and manage our social media presence (LinkedIn, Instagram, Facebook), and to ensure timely publication of news and updates. An official presence has also been established on Little Red Book (Xiaohongshu).

g. Social Media Campaigns:

Ongoing monthly campaigns and topic creation drive increased student engagement and online visibility.

h. Annual Event Plan:

An annual event plan is in place to regularly host student events that promote engagement and a vibrant campus life.

i. Weekly Marketing Meetings:

Weekly meetings are held to update staff on programme developments, student recruitment, and communication strategies.

j. Agent Training:

Training is provided both online and offline to ensure agents are well-informed about courses, entry requirements, student services, fees, and key dates.

k. Communication with Clients:

Regular promotional emails, newsletters, activity calendars, and notices are sent to maintain engagement with our client base.

l. Student Feedback:

Student feedback is consistently gathered and reviewed to drive improvements in services and communications.

m. Monthly Job Club:

We host a monthly job club providing free employment guidance for students navigating the New Zealand job market.

n. First Language Support:

Support is available in students' native languages to improve understanding and enhance service accessibility.

Evidence:

- **Website Launches:** All four websites are live and operational.
- **Marketing Collaterals:** Updated digital and printed materials are in use.
- **Corporate Gifts:** ICL-branded items have been designed and ordered.
- **Application Form Update:** Revised and fillable PDFs are now in use.

- **Distribution of Materials:** Up-to-date resources have been distributed to agents and students.
- **Social Media Engagement:** Increase in content output and follower count.
- **Agent Performance Reviews:** Ongoing evaluations and updated agreements.
- **Agent Training & Office Visits:** Conducted regularly to support agent networks.
- **Marketing Manager Visits:** Annual visits to engage with agents and attend regional education events.
- **Hosting Delegations:** Hosted international delegations and signed MoUs.
- **Interdepartmental Collaboration:** Ongoing collaboration through regular meetings.
- **New Staff Training:** Documented procedures and onboarding process in place.

Future Actions:

- Continue organising regular student events.
 - Host annual events for agents.
 - Maintain and update marketing collaterals consistently.
 - Continue distributing newsletters and updated information to agents.
 - Strengthen social media engagement by producing more student experience videos.
 - Implement the annual social media campaign and content calendar.
 - Develop closer connections with alumni and collect employment outcome data.
 - Organise and participate in webinars for students and agents.
 - Enhance agent training initiatives continuously.
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Managing and Monitoring Education Agents

Compliance Status: Compliant

Compliance Details:

We maintain a comprehensive framework to manage and monitor our education agents (retailers), ensuring quality, compliance, and consistent performance. Key practices include:

a. Clear Communication:

We ensure timely and clear communication with our retailers via emails, phone calls, texts, online meetings, webinars, agent visits, and events. This multi-channel approach ensures that critical information is effectively disseminated.

b. Performance Review:

Agents' performance is regularly reviewed based on a combination of factors, including application volume and quality, compliance with institutional policies, feedback from students, and visa approval rates. Adjustments to commission structures or agreement terms may be made based on performance outcomes.

c. Compliance Monitoring:

We actively monitor agent compliance with our internal procedures and the Code of Practice. Misconduct or non-compliance is investigated thoroughly. Where necessary, notices are issued and agreements are terminated. All relevant documentation is recorded.

d. Support and Development:

We provide ongoing support to our agents, helping them improve their performance by addressing challenges, setting KPIs, and collaborating on solutions. Regular training is offered to ensure agents are well-informed about courses, promotions, events, and procedures.

e. Reference Checks:

Before entering into agreements with new agents, reference checks are conducted. All checks and related documentation are kept on file.

f. Student Feedback:

We collect feedback from students regarding their experience with agents. This input is used to assess and improve agent services and performance.

Evidence:

- **Daily Communication Logs:** Ongoing correspondence with agents via email, phone, and meetings.
- **Agreement Management:** Regular renewal and review of agent agreements, with an up-to-date agent database.
- **Performance-Based Reviews:** Adjustments to commission and agreement terms based on performance data.
- **Training Records:** Records of agent training sessions (online, in-office, or via visits).
- **Compliance Documentation:** Investigations and termination notices are formally documented and archived.
- **Web and Social Media Updates:** Regular updates on websites and social media platforms for agents' access.
- **Reference Check Records:** Completed reference checks for all new agent applications.

Future Actions:

- Continue enhancing communication channels to ensure agents are consistently informed.
 - Maintain a regular cycle of reviewing and renewing agent agreements.
 - Ensure that all school updates, policies, and marketing materials are shared promptly with agents.
 - Continue monitoring performance and visa approval rates for quality assurance.
 - Provide regular agent training to keep them informed of institutional updates.
 - Keep websites and social media platforms updated with current and relevant content.
 - Continue gathering and analysing student feedback on agent services to inform ongoing improvements.
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Offer, Enrolment, Contracts, and Insurance

Compliance Status: Compliant

Compliance Details:

We have robust procedures in place to ensure that the offer, enrolment, contract, and insurance processes are compliant with the Code of Practice, while remaining student-centric and efficient. Key practices include:

a. Application Document Assessment:

We ensure all required documentation is received before issuing offer letters. Our academic team carefully assesses each application to confirm eligibility against entry criteria. All documents are securely archived in shared folders for record-keeping.

b. U18 Student Applications:

Applicants under 18 and their guardians must complete a U18 Student Agreement Form. For those not living with a parent or legal guardian, approved homestay or designated caregiver arrangements are mandatory.

c. Clear and Accurate Information:

We provide comprehensive and transparent information on programmes, fees, policies (including refunds and withdrawals), academic pathways, and employment opportunities. This is communicated through multiple channels to both students and agents.

d. Documentation and Record-Keeping:

All student documents, including valid visas and insurance certificates, are reviewed and filed in our shared folders prior to enrolment.

e. Orientation:

We deliver orientation both online and in person at each intake, ensuring students receive essential information before their courses begin. Orientation packs and details are emailed in advance.

f. Website and Platform Updates:

Course and enrolment information on our websites and digital platforms is updated regularly. Social media is also used to share relevant updates with students and stakeholders.

Evidence:

- **Updated Application and U18 Forms:** Maintained in shared folders with clear terms and conditions.
- **Marketing Materials:** Regularly reviewed, updated, and distributed to agents and prospective students.
- **Website and Social Media:** Timely updates to ensure alignment with current programme offerings and policies.
- **Accommodation Booking Form:** Up-to-date forms and fee information provided to students and archived.

- **Visa and Insurance Records:** Required before enrolment and securely stored.
- **Agent Training Records:** Ongoing online and offline sessions with documentation of participation.
- **Staff Training and Internal Communication:** Training sessions and interdepartmental updates ensure consistent messaging.
- **Student Supervision:** Ongoing monitoring of attendance, insurance, and visa validity to ensure student compliance.

Future Actions:

- Continue enhancing the clarity, consistency, and accessibility of information across all platforms (brochures, websites, social media, etc.).
 - Maintain regular agent training (online/offline) to ensure understanding of current policies, fees, course details, and student obligations.
 - Continue providing detailed and timely pre-enrolment information to students and agents.
 - Ensure consistent delivery of comprehensive orientation for all new intakes, online and offline.
 - Continue offering staff training and interdepartmental updates to ensure accuracy and alignment.
 - Maintain and expand first-language support to ensure all students receive clear and accessible communication.
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Immigration Matters

Compliance Status: Compliant

Compliance Details:

We maintain robust processes and open lines of communication with Immigration New Zealand (INZ) and key stakeholders to ensure full compliance with immigration regulations and visa conditions.

a. Staying Informed:

We subscribe to updates from Immigration New Zealand, English New Zealand, and ITENZ to stay current on all immigration matters affecting our students and institution.

b. Information Sharing:

We ensure that students and education agents (retailers) are promptly informed of any changes to immigration policies and visa requirements. Relevant internal processes are adapted accordingly.

c. Enrolment Compliance:

Only students with the appropriate valid visa documentation are enrolled. Applications that do not meet immigration requirements are not processed.

d. Ongoing Communication with INZ:

We engage in continuous two-way communication with INZ to provide supporting documentation for visa applications, respond to queries, and seek clarification when needed.

Evidence:

- **Visa Requirement Communication:** Clear communication with students and agents about visa conditions via email and phone.
- **Enrolment Control:** No students are enrolled without valid visas. Enrolment records are maintained in EnrolPro.
- **Interdepartmental Coordination:** Marketing and administration teams collaborate closely to ensure consistency in messaging and support for students and agents.
- **Correspondence with INZ:** Ongoing emails and letters to and from INZ regarding visa support, application clarifications, and student status updates.

Future Actions:

- **Immigration Update Newsletter:** Introduce a regular newsletter for students and staff, summarising key immigration changes and updates from INZ.
 - **Student Representative Meetings:** Add immigration updates as a standing agenda item in student representative meetings to improve awareness and promote discussion.
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Orientation

Compliance Status: Compliant

Compliance Details:

We provide consistent, effective Orientation sessions across all our schools—GBS, AEA, BIC, and the Graduate Diploma in Teaching (ECE)—to ensure students are well-informed and supported from the outset of their academic journey.

a. General Orientation (GBS and Language Students):

Orientation is conducted regularly and includes distribution of a comprehensive Orientation pack. This contains the student handbook, outlining school policies, designated staff contacts, complaints procedures, refund/withdrawal processes, and other Code of Practice-aligned content.

b. Auckland English Academy (AEA):

- Held weekly every Monday.
- Orientation content includes academic and administrative processes tailored to each program.
- Orientation slides and handbooks are reviewed and updated before each session.
- Admin staff deliver sessions and collect enrolment documentation.
- Students are informed of Orientation schedules in a timely manner.

c. Bridge International College (BIC):

- Follows the same process as AEA with content specific to NZCEL programs.
- Orientation is held at the start of each intake.

d. Graduate Business School (GBS):

- Scheduled the week prior to class commencement.
- Delivered both face-to-face and online to cater to offshore students.
- Canvas modules are introduced for hands-on navigation during Orientation.
- Slides and documents are reviewed before each session.
- A second Orientation is held in Week 3 to accommodate late enrolments and students seeking clarification.

e. Graduate Diploma in Teaching (ECE):

- A separate, specialised Orientation is provided due to the nature of the program and practicum requirements.
- Orientation is held during each intake and within the two-week late enrolment window.

f. Student Support Across All Schools:

Reception staff are available at every Orientation to assist, guide, and support students. Feedback is actively collected and analysed to inform improvements.

Evidence:

- **Student Communication:** Orientation schedules, formats, and details are communicated clearly and in advance.
- **Orientation Materials:** Updated slides and Orientation packs are shared with students digitally and in print.
- **Attendance Tracking:** Comprehensive records of Orientation attendance are maintained.

Future Actions:

- **Enhance Student Engagement:** Make Orientation sessions more interactive and enjoyable to boost student engagement.
 - **Celebrate Cultural Diversity:** Integrate cultural activities and content that highlight New Zealand culture while providing opportunities for students to share their own backgrounds and traditions.
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Safety and Wellbeing

Compliance Status: Compliant

Compliance Details:

We are committed to fostering a safe and supportive environment that promotes the wellbeing of all students across all programs.

a. Student Support Accessibility:

Clear student support contact details are provided to all students, ensuring they know who to reach in emergencies or times of need.

b. Academic Collaboration:

A strong referral system is in place between teaching staff and the Student Support team.

- Teachers are encouraged to refer students showing signs of needing additional help.
- Students may also approach Student Support directly. Where necessary, with the student's consent, relevant information is shared with teaching staff.
- Student Support and Academics coordinate to identify common needs and design tailored workshops or share important information with students.

c. Support for Pregnant Students:

Tailored support is offered to students who become pregnant during their studies, including collaboration with Immigration New Zealand and the academic team to ensure students are informed and supported appropriately.

d. Engagement with Authorities:

Where appropriate, communication with external authorities is conducted to ensure the safety and well-being of students.

e. Follow-ups and Check-ins:

Student Support regularly conducts phone calls and follow-ups for students who have been referred or requested assistance.

f. Job Club Initiative:

The Job Club provides guidance and workshops on job-seeking skills, helping students, especially new arrivals, understand how to secure employment. These workshops are jointly facilitated by academic and admin staff.

g. External Workshops:

We have invited external experts to deliver sessions on mental health, coping mechanisms, and job search strategies.

h. Homestay and Arrival Support:

We maintain partnerships with multiple homestay providers to ensure accommodation is safe

and suitable. Airport pickup services are arranged when needed to provide a secure transition to homestay living.

Evidence:

- Communication records between students, support staff, and academics
- Workshop logs and materials
- Student notes recorded in EnrolPro
- Job Club materials and session attendance
- Student feedback surveys and responses

Future Actions:

- **Integrated Record Keeping:** Develop a more structured and consistent system of recording student support interactions within EnrolPro.
 - **Enhanced Partnerships:** Increase collaboration with external organisations and run regular programs on common issues affecting students (e.g., mental health, employment, tenancy rights).
 - **Homestay Network Expansion:** Explore new partnerships with additional homestay providers to expand student accommodation options and improve safety.
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Learner Support, Advice, and Services

Compliance Status: Compliant

Compliance Details:

We are committed to providing well-rounded support services that meet the academic, personal, and cultural needs of our learners.

a. Attendance Monitoring and Intervention:

Student Support actively monitors attendance. Follow-ups are conducted when students are absent, often uncovering broader issues that require support.

b. Personalised Follow-Up:

Attendance warning letters are issued in person during face-to-face meetings. This not only reinforces policy expectations but also allows for meaningful interaction and support tailored to the student's situation.

c. Cross-Departmental Collaboration:

Admin and academic staff work in close partnership to ensure students receive holistic support throughout their academic journey.

d. Policy Awareness:

School policies are clearly explained during Orientation. These are consistently implemented and referenced when providing guidance and support.

e. Flexible and Compassionate Support:

Students are encouraged to discuss their challenges. When students need to pause studies or take extended leave, we provide support in line with policy, maintaining communication throughout the student's time away and upon their return.

f. Proactive Staff Engagement:

Admin and Student Support staff attend weekly academic meetings to ensure they are aligned with current learner needs and can offer targeted assistance.

g. Celebrating Cultural Diversity:

We actively promote a sense of belonging and inclusivity by acknowledging and celebrating important cultural events such as Diwali, Chinese New Year, and national sporting milestones.

Evidence:

- Communication records between students and Student Support
- Notes and updates recorded in EnrolPro

Future Actions:

- **Recruitment:** Hire additional staff specifically focused on Student Support to meet growing needs.
 - **Workshops and Presentations:** Expand the range of sessions offered on topics relevant to student life and wellbeing.
 - **Cultural Engagement:** Increase the number and variety of cultural celebrations to reflect the diversity of our student body.
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Managing Withdrawal and Closure

Compliance Status: Compliant

Compliance Details:

We have effective processes in place to manage student withdrawals and ensure transparency and compliance with regulatory requirements.

a. Clear Policy Communication:

Withdrawal and refund policies are clearly stated in the Application Form, explained during Orientation, and included in the Student Handbook provided to all students.

b. Staff Awareness and Procedure Compliance:

Sales and front-line staff are regularly reminded to follow proper procedures for processing withdrawals. When a student on a visa withdraws, Immigration New Zealand is notified as required.

c. Case-by-Case Handling:

Admin and Student Support staff handle withdrawal requests sensitively, especially those arising from unavoidable circumstances or changes in visa policy, ensuring students are supported appropriately.

Evidence:

- Processed withdrawal requests with documented communication
- Communication records with students, NZQA, and other education providers

Future Actions:

- **Withdrawal Form Compliance:** Ensure every student completes a formal withdrawal form before leaving their course.
 - **Retailer Communication:** Reinforce understanding of the Withdrawal and Refund Policy among agents/retailers, particularly during the offer letter stage.
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Dealing with Complaints

Compliance Status: Compliant

Compliance Details:

We have demonstrated a consistent and fair approach to managing complaints, ensuring students are heard and supported, while internal processes are continually reviewed for improvement.

a. Fair and Transparent Process:

In response to post-COVID growth and increased student numbers, we have addressed a higher volume of complaints with a fair and balanced approach, taking all facts into account.

b. Cross-Departmental Collaboration:

Complaints are managed by the relevant department and escalated to Academic Directors, Directors of Study, Admin Managers, or the Campus Principal when necessary. This ensures appropriate handling and resolution at every level.

c. External Endorsement:

All complaints escalated to Study Complaints have been resolved in favour of ICL, reflecting the fairness and transparency of our internal processes.

Evidence:

- Communication and documented notes between departments
- Resolution outcomes shared and supported with appropriate follow-up
- Record of complaint escalations and outcomes

Future Actions:

- **Ongoing Policy Communication:** Continue to communicate clearly with students and staff about any process or policy changes.
 - **Greater Student Engagement:** Increase opportunities for students to interact with management to provide feedback or raise concerns directly.
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Compliance with International Learner Contract Dispute Resolution Scheme (DRS)

Compliance Status: Compliant

Compliance Details:

We have demonstrated full compliance with the DRS by handling all disputes and complaints in accordance with established policies and procedures.

a. Fair Resolution of Complaints:

In all complaints escalated to Study Complaints, ICL's decisions were upheld, confirming the robustness and fairness of our internal processes. One case was closed due to no response from the student.

b. Adherence to Formal Process:

For informal complaints, students were informed of their right to submit a formal complaint to Study Complaints. These matters were effectively resolved internally following ICL Group's comprehensive Complaints Policy.

Evidence:

- Communication records with Study Complaints
- Communication with students about the formal complaint process
- EnrolPro logbook entries documenting relevant interactions
- Orientation slides and Student Handbook explaining the DRS process

Future Actions:

- **Policy Review:** Ongoing review and updates of relevant policies, procedures, and documentation

- **Orientation and Communication Enhancements:** Regularly review orientation content and communication strategies to ensure all students understand the complaint process and their rights
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Under-18 Student Support

Compliance Status: Compliant

Compliance Details:

We ensure comprehensive support and safety for all under-18 students through consistent monitoring and communication with caregivers and relevant parties.

a. Absentee Notification:

ICL promptly informs the caregiver of any absences of under-18 students via email to ensure the safety and well-being of the student is monitored closely.

b. Agreement and Monitoring:

For all under-18 students, the U18 Agreement and Home Visit Form must be signed by the caregiver. We also use the U18 Arrival/Quarterly Review Form to track the student's progress and well-being.

c. Accommodation Safety Checks:

We conduct safety checks on accommodation for under-18 students to confirm that it is secure and suitable. Additionally, caregivers must provide Police Vetting documentation to further confirm the accommodation's safety.

d. Emergency Contact Information:

ICL requires all under-18 students to provide their parents' or caregivers' contact details. This ensures that, in case of an emergency, the appropriate contacts can be reached immediately. The Principal, Ewen Mackenzie-Bowie, is the designated contact for any emergency situations.

Evidence:

- U18 caregiver agreements
- Homestay safety audit reports

Future Actions:

- **Continuous Improvement:**

We will continue to engage with feedback and review policies to ensure they align with the latest regulations and best practices, updating systems where necessary.