



THE UNIVERSITY
of ADELAIDE
COLLEGE

Agent Management Policy and Guidelines

Published August 2017

Table of Contents

1.0	Introduction	3
2.0	Guidelines	3
2.1	Agent Application	3
2.2	Agent Approval	3
2.3	Training	4
3.0	Agent Updates	5
4.0	Agent Payments	5
5.0	Monitoring and Reviewing Agent Performance	5
6.0	Agent Marketing	6
7.0	Corrective Action	7
8.0	Agent Reporting	7

1.0 Introduction

This policy outlines the strict process of application and approval in the selection of education agents to work with the University of Adelaide College (the 'College'). The policy also outlines the College's firm practice in monitoring and suspending or terminating agents who do not act in an appropriate manner, and ensuring all agents act honestly and professionally in their representation of the College's programs.

2.0 Guidelines

2.1 Agent Application

Agents who wish to become a College approved Agent must follow the guidelines set out below.

- It is the responsibility of the relevant manager to ensure that communication between the College and its agents is efficient and effective.
- New agents are actively sourced by the College based on development markets. New agents can also be sourced, with assistance, from:
 - The University of Adelaide
 - existing College approved agents
 - Kaplan entities in Australia or overseas.
- An Agent can also make an enquiry about becoming a College approved Agent by:
 - contacting the College directly by phone or email
 - visiting a College location
 - contacting a Kaplan business either domestically or internationally
 - being visited by a College representative either domestically or internationally.
- The relevant manager contacts the enquiring Agent and requests relevant information, including the company profile, before providing the application of the prospective Agent to the relevant Sales Manager.
- The relevant Sales Manager then decides whether to continue with the application or not.
- If the Agent's application is not approved, the Agent is notified in writing by the relevant manager.

2.2 Agent Approval

When the College decides to continue with the Agent application, the relevant manager will create a new Agent account in the College management system and enter all relevant information.

- The manager requests the Agent complete a New Agent Questionnaire. All information in the questionnaire must be true and correct.
- Referees are also requested, where applicable.
- The manager may request approval from the Sales Director if non-standard commissions or bonuses apply.

- The application is then submitted to Compliance for relevant checks:
 - Correctly completed questionnaire
 - Relevant references
 - Required data fields completed correctly
 - Names of the agency and director(s) or authorised representative(s) that will sign the agreement are run through a global database to determine if there are any 'red flags' in dealing with this agency and/or Agent.
- Once all checks have been completed, Compliance produce an Agent Agreement:
 - The duties and responsibilities of the College are stipulated in the College Agent Agreement
 - The Agreement is sent electronically to the prospective Agent
 - The Agent has three (3) months to digitally sign the Agreement before it is voided, however automatic reminders are sent to the Agent on a weekly basis. However, no enrolments are accepted from the Agent and no payments are made to the Agent until the Agent has signed their agreement with the College.
 - When the Agent signs digitally, Compliance and the relevant manager are notified immediately by email.
 - The Agent also automatically receives an electronic copy of the signed contract
 - Compliance then verify the legitimacy of the Agreement and activate in the College management system
 - Upon activation in the College management system, the Agent is sent a/an:
 - Current Prospectus
 - Agent Sales toolkit, which includes promotional material, market specific fact sheets, application forms, fee sheets and a brand guidelines pack
 - Agent details are updated on the College website twice a year.

If the Agent's application is not approved, at any stage, the Agent is notified via email by the College.

2.3 Training

All new agents are provided with appropriate training on the College's courses and programs as well as clarification of the Agent's obligations and responsibilities under The National Code and ESOS Act (2000). This training is provided in person, via Skype, over the phone or through email.

Where applicable, Genuine Temporary Entrant (GTE) training is conducted with agents in person, via Skype, over the phone or through email. This training is aimed at managing any potential visa risks arising from a student's reasons for seeking to study in Australia.

- If the new Agent is based in Australia, the relevant manager will arrange for the Agent's Director/Manager to have a meeting and tour of the campus. This meeting should include information regarding the courses and facilities available at the College to ensure the Agent will pass on relevant information to prospective students.
- If the new Agent is overseas, the relevant manager will, where possible, arrange for a College representative - who may be travelling to that specific region - to meet with the Agent, view their premises and practices as well as informing them about the courses and facilities available at the College to ensure the Agent will pass on the correct information to prospective students.

Ongoing training is also provided through:

- Agent familiarisation visits to Australia
- Agent training and workshops days held in market
- Various training sessions where representatives from the University of Adelaide or Study Adelaide may be present.

3.0 Agent Updates

As required, the relevant manager communicates to agents on:

- Product and/or University updates
- Relevant government process changes
- The advertising of events.

In addition:

- If the College Agent is based in Australia, the relevant manager should regularly visit the Agent.
- If the College Agent is based overseas, the relevant manager should, where possible, arrange for a College representative who may be travelling to that specific region to visit the Agent.
- The relevant manager must ensure that all existing agents have current information on applicable promotional prices, new procedures and enquiry/enrolment information.
- Every College Agent is emailed a 'College Agent Update Email' every second month detailing the latest College updates.

4.0 Agent Payments

Payment of commission is made in accordance with the College's Agent Agreement. In addition, Agents may be eligible to take part in the College's Bonus Incentive Scheme which is reviewed annually at which time agents may be invited to participate.

5.0 Monitoring and Reviewing Agent Performance

The College monitors and reviews the performance of its approved agents on an ongoing basis as well as through a formal annual review. The College collects information about each Agent's performance through Australian government agencies (such as immigration and education) and their reporting systems, local government agencies around the world, and student feedback, including those that change agents.

Ongoing Agent Performance Reports are to be completed every two months and include the relevant manager reporting formally on:

- Agent performance in their specific market
- Any issues that have arisen including concerns and challenges

Annual Agent Performance Reports

- The College will review Agent performance before the end of every year.
- Agents will be sorted into three groups:
 - Dormant
 - Performing
 - New (registered with the College for under 6 months).
- Agents who are “dormant” may be suspended in the College management system and no further enrolments will be allowed until the suspension is lifted. If a suspended agent seeks to be reactivated the agent may be required to undertake the full Agent approval process at the College’s discretion.
- Agents who are “performing” will remain under contract with the College provided the Agent has maintained consistent enrolments and demonstrated a proven ability to continue to abide by all regulatory requirements, including ESOS and the National Code.
- Higher Performing agents may be provided with a number of incentives, including (but not limited to) bonuses and additional marketing support and resources at the College’s discretion.
- Agents who have not acted in a professional manner and/or have not adhered to all regulatory requirements and/or the terms of their agreement with the College, will be subject to any or all of the following actions:
 - A written warning on performance from the College
 - Suspension of their Agent Agreement (i.e. no enrolments allowed until the Agent can demonstrate their capacity to improve performance)
 - Termination of Agent Agreement (i.e. the Agent’s relationship with the College is fully terminated such as in the case of criminal activities and serious non-compliances by the Agent or any of its officers, employees or subcontractors)

The College supports an Agent’s right to appeal any decisions made by the College in relation to its Agent Agreement. Agents will be given the opportunity to show cause as to why any of the above actions should not be imposed against them by the College by submitting their reason(s) and any supporting documentation to the Sales Manager in writing. The Sales Manager will review the appeal and establish if the Agent is eligible for a probationary extension of the Agent Agreement valid for 3 to 6 months or the re-issue of an Agent Agreement.

6.0 Agent Marketing

The use of the College name, logo and other branding is subject to guidelines agreed with the University of Adelaide. All agents must ensure the following in conducting marketing and promotion activities connected with the College (in addition to complying with the terms of their Agent Agreement, ESOS and the National Code):

- Adherence to the College’s Agent Brand Guide (or other directions issued by the College) to ensure consistent, compliant and professional use of the College brand.
- Only advertise the provision of courses with the written permission from the College.
- Ensure that the College’s business name and CRICOS Provider Number appear in all written and electronic marketing material.

- All advertising and use of the College brand must be approved by the College prior to publication.
- All requests for use of the College brand are sent by email to marketinganz@kaplan.com.

7.0 7.0 Corrective Action

All Agents must adhere to the terms of this policy. Any Agent that is found not to be compliant with these requirements will be subject to corrective action. The College will undertake the following action before terminating an Agent Agreement:

- If it is established that an Agent has engaged in unsatisfactory performance or in breach of the terms of their Agent Agreement, the compliance team or the relevant manager will make a recommendation to the Sales Manager to issue a warning or immediately terminate the Agent's Agreement.
- Where a warning has been issued, the Sales Manager will have discretion to determine the most appropriate action.
- In the first instance, a letter or email of warning will be sent.
- When an Agent has breached the terms of its Agent Agreement, the compliance team must be notified and a letter informing the Agent of circumstance of the default must be sent to the Agent.
- This notice must also provide the Agent with a right to submit their reason(s) as to why the College should not proceed to terminate the Agent's Agreement (i.e. show cause).
- Where the College determines that the Agent has engaged in a material or significant breach of the terms of its Agent Agreement then the College may issue an immediate termination notice without any right to show cause. A material or significant breach may include fraud, dishonest or misleading marketing activities and/or a negative notice received from the College's global compliance monitoring systems and database.

8.0 Agent Reporting

- The University of Adelaide and the College are jointly committed to the appointment, monitoring and managing of Agents in line with this Policy and ESOS and the National Code.
- The University of Adelaide and the College has established a Joint Marketing Board through which the strategies for marketing and promotion of the College are agreed and implemented. This board also takes responsibility for Agent monitoring. An Agent performance report will be submitted to the quarterly Joint Marketing Board meetings outlining the following:
 - Performance of key agents
 - Summary of training and monitoring of agents that has been conducted
 - Any corrective action taken against agents
 - Number of visa rejections and actions taken to prevent future occurrences