

KOI Agent Digital Media Compliance and Monitoring Protocol

<https://marketinghub.koi.edu.au/koi-agent-management/>

29 June 2026

Purpose

The purpose of the [KOI Agent Digital Media Compliance and Monitoring Protocol](#) is to establish a structured and repeatable process for KOI to periodically monitor and review the websites, social media, digital advertising and other online promotional activities of its Education Agents.

The Protocol supports KOI's ongoing oversight of Education Agents by verifying that information published or promoted in connection with KOI is accurate, current, authorised and not false or misleading, and is consistent with KOI's branding requirements, Education Agent Management Policy, Education Agent Code of Conduct, Education Agent Agreement, and applicable requirements of the ESOS Act 2000 and National Code of Practice for Providers of Education and Training to Overseas Students 2018.

Special attention is given to advertising or recruitment activity that may create heightened regulatory risk, including unauthorised or misleading representations **concerning student transfers**, commissions or incentives, scholarships, fees, admissions, courses, visa-related matters, or other recruitment arrangements.

The Protocol provides KOI with a practical mechanism for detecting, documenting, assessing, escalating and resolving potential Education Agent advertising and recruitment non-compliance, including corrective action, warning, enhanced monitoring, suspension or termination where appropriate under KOI's Education Agent governance framework.

Scope

The Protocol applies to all KOI Education Agents and, where applicable, their disclosed representatives, branches, sub-agents and other third parties undertaking KOI-related Education Agent activities.

It applies to digital channels through which KOI, its courses or student recruitment opportunities are promoted, including but not limited to Education Agent websites, Facebook, Instagram, TikTok, LinkedIn, YouTube, Google, paid digital advertising, online event promotions and other websites, social media or digital marketing channels.

Monitoring may include the use of KOI's name, logo and branding; course and admissions information; fees and scholarships; student transfer messaging; commissions, incentives or promotional offers; representations concerning visas or migration outcomes; and any other content that may reasonably be understood as representing KOI or recruiting students for KOI.

This Protocol does not replace the [KOI Education Agent Management Policy](#), [Education Agent Code of Conduct](#) or Education Agent Agreement. It operationalises and supports those requirements by establishing a documented process for digital monitoring, evidence collection, escalation, corrective action and ongoing oversight.

1. Monitoring Process

KOI reserves the right to periodically review an Education Agent's website, digital media, and other promotional material referring to KOI to assess compliance, accuracy, currency, and alignment with KOI's requirements and expectations.

This includes:

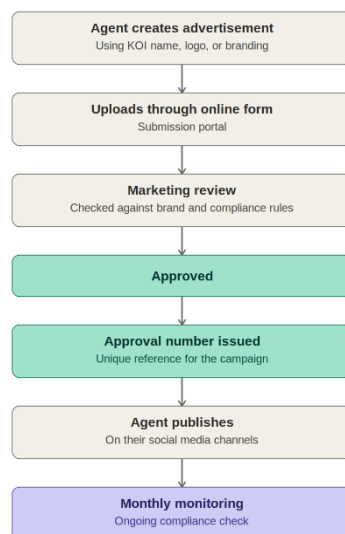
- **Website Review:** KOI may from time to time review content published on the agent's website to assess whether information relating to KOI is accurate, current, appropriately presented, and consistent with KOI requirements and applicable regulatory expectations, including Australian Consumer Law.
- **Digital Media Audit:** KOI will review other digital media platforms (e.g., Facebook, Instagram, LinkedIn, Youtube and Google) used by education agents to promote KOI's programs.
- **Marketing Material Compliance:** All marketing collateral, including the use of KOI logos, colors, and typefaces, must strictly follow the KOI Branding Guidelines (Version: April 2026) to maintain brand integrity and consistency across platforms (<https://marketinghub.koi.edu.au/branding-guide/>)
- **Time to time review** of the archived webpages and websites that house aggregated KOI course data: This includes the review of archived webpages and external websites that aggregate KOI course data. The review ensures the accuracy and timeliness of information regarding KOI on these platforms. Any discrepancies identified will be reported, and corrective actions will be taken to avoid misrepresentation of KOI's offerings.

2. Approved Marketing Materials

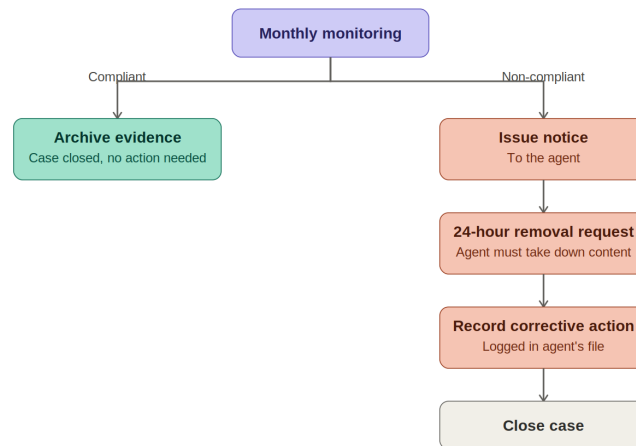
KOI will regularly provide approved marketing materials to education agents to ensure consistency and compliance. This includes:

- Official logos and branding assets, as specified in KOI Branding Guidelines
- Pre-approved advertisements and marketing content.
- Guidelines for the use of KOI branding and materials across all platforms, including social media.
- Social media artworks and advertising content made by education agents
- Reporting and corrective action

Education Agent Partners must follow to seek approval before creating or publishing advertisements that use KOI's name, logo, or branding on their social media channels. It also sets out how KOI monitors published content for ongoing compliance. The diagram below shows the end-to-end process from advertisement creation through to publishing.



Once content is published, the marketing team reviews it monthly. The outcome determines whether the case is archived or escalated.



- Education Agents: creates advertisements, submits for approval, publishes only after receiving an approval number, and removes content promptly if a non-compliance notice is issued.
- KOI Marketing team: reviews submissions, issues approval numbers, conducts monthly monitoring, and manages the non-compliance process.

3. Breach Classification and Escalation

Risk Ratings

Risk Rating	Example (any channel)	Required Action
High	Misrepresentation, false or misleading claims, unauthorised representations on behalf of KOI, improper solicitation of students to transfer to KOI, aggressive recruitment practices, cash back incentives, or any serious breach of the ESOS Act, National Code or Education Agent Agreement.	Immediate written breach notice; immediate cessation or removal of the non-compliant content/activity; record under the Education Agent Misconduct Register; escalate to Marketing Director and Senior Executive for consideration of further action under the Education Agent Management Policy (e.g. mandatory training, suspension or termination).
Medium	Unapproved social media posts or advertisements (published without the approval); use of unapproved promotional material; unapproved testimonials or student images; unapproved scholarship or fee claims; vague or potentially misleading statements; inaccurate course, intake or campus information.	Written breach notice; correction within 24–48 hours; record under the Education Agent's misconduct register and monitor future compliance.
Low	Outdated fee or scholarship information; Outdated or incorrect KOI logo or branding; spelling or formatting errors; missing CRICOS number where required; expired promotional material; minor administrative errors without misleading students. no misrepresentation.	Formal/ informal reminder; correction within 48 hours

4. Consequences of Non-Compliance

Failure to comply with KOI's branding and marketing guidelines, or providing false or misleading information, directly or indirectly invites currently enrolled students from another provider to KOI, may result in the following actions:

- Warning: the agents will receive a formal warning outlining the non-compliance and necessary steps to rectify the situation.
- Suspension: persistent non-compliance or failure to address the issues within the given timeframe may result in the suspension of the agency agreement.

5. Review and Updates

This monitoring protocol will be reviewed annually, or as needed, to ensure it aligns with KOI's policies and the evolving regulatory environment. KOI reserves the right to update this protocol and the associated branding guidelines at any time.

For further information or assistance, please contact the KOI Marketing Department (marketing@koi.edu.au)