

PP01 MARKETING AND PROMOTIONAL MATERIAL POLICY AND PROCEDURE

PURPOSE

To ensure consistent, accurate and ethical standards are used for all marketing activities and meets all governing legislation and regulations, as well as enabling prospective students to make an informed decisions regarding their choice of course, learning needs and supports, fees and refunds, delivery and assessment methods. This includes the provision of accurate and unambiguous information regarding the Southern Cross Education Institute's services and performance.

SCOPE

This policy and procedure applies to all staff of Southern Cross Education Institute who are responsible for and/or involved in marketing and enrolment of student activities, this includes its authorised education agents and third party providers.

DEFINITIONS

SCEI	Southern Cross Education Institute
Student	Active, on-campus student with a current course of enrolment with Southern Cross Education Institute. Includes a person (whether within or outside Australia) who holds a student visa as defined by the ESOS Act, but does not include students of a kind prescribed in the ESOS Regulations
Prospective student	A person who is considering attending SCEI but has not yet officially enrolled
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
Education Agent	A person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers.
Third party	Any party that provides services on behalf of the RTO but does not include a contract of employment between an RTO and its employee
Training product	AQF qualification, skill set, unit of competency, accredited short course and module
VET sector	Vocational Education and Training Sector
AQF	Australian Qualifications Framework
NRT	Nationally Recognised Training
National Code 2018	The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018

POLICY

Southern Cross education Institute:

1. Is committed to ensuring ethical marketing of training products and services are implemented.
2. Ensures that marketing processes properly inform and protect prospective and current students by providing accurate and factual information regarding training and assessment service provided, fees and learning support services. This is regardless of whether the information is provided by SCEI, its agents, brokers, online directories or other third parties. (1.1)
3. By complying with the Standards, SCEI ensures consumer protection laws are adhered to. (1.1)
4. Advertises courses (AQF and NON Accredited) only if they are included in the scope of registration and will not state or imply that services are within the scope if they are not.
5. Ensures that in seeking to enter into written agreements with all current students or prospective students all information given makes clear distinction between nationally recognised training and non-recognised training. (1.1, 1.2)
6. Ensures that all marketing material identify training and assessment services leading to AQF qualification and/or Statement of Attainment separately from any other non-nationally recognised training and assessment services.
7. Ensures the appropriate use of the Nationally Recognised Training (NRT) and Australian Qualification logos on advertisements in accordance with Standards and Guidelines.

8. Obtains prior written permission from any person or organisation for use of any marketing or advertising material, which refers to or provides a visual of that person or organisation, and will abide by any conditions of that permission.
9. Ensures it distinguishes where it is delivering training and/or assessment on behalf of another RTO.
10. Ensures that it distinguishes where training and/or assessment is being delivered on its behalf by a third party.
11. Markets all products and services in an ethical manner ensuring integrity and accuracy; avoiding misleading or ambiguous statement, enabling clients to make informed decisions about training products.
12. Only promotes licensing or regulated outcomes, for training products it delivers, where these have been confirmed by the relevant industry regulator in the jurisdiction in which it is being advertised.
13. Course objectives, costs and expectations are clearly communicated to participants prior to commencement (2.1.3)
14. Includes details regarding VET Student Loans, government funded subsidy or other financial support arrangements associated with the provision of relevant training products.
15. Does not guarantee:
 - 15.1. a student will successfully complete a training product on its scope of registration; or
 - 15.2. a training product can be completed in a manner which does not meet the requirements of the relevant training package or VET accredited course; or
 - 15.3. a student will obtain a particular employment or migration outcome as a result of training and/or assessment. (1.3.1)
- (1.1) (1.3.2)
- 15.4. encourage unrealistic expectations about the level of qualifications attainable and the facilities and equipment provided: or (1.2.4)
- 15.5. make misleading statements concerning the qualifications or experience of staff; or
- 15.6. give false or misleading comparisons with other education providers and training products; or
- 15.7. give false or misleading information or advice in relation to claims of association between providers, or any other persons or organisations the registered provider has arrangements with for the delivery of the course in which the student intends to enrol or may apply to enrol; or (1.2.1)
- 15.8. guarantee or infer any promise that a student will be automatically accepted into another course.
- 15.9. guarantee that a student will be eligible for any license or accreditation as a result of training and/or assessment unless it is a license outcome guaranteed by the issuer of the license or accreditation.
16. Will ensure any course information details of the requirements for acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience is clear, thorough and factual. (1.2.3)
17. Ensures any requirement for work based training required during the duration of the course will be outlined clearly and thoroughly. (1.2.2)
18. Will ensure at all times that full details or special conditions applying to our services will be communicated to our prospective and current students.

PROCEDURE

1. Ethical Marketing Practices

- 1.1. SCEI will ensure that itself, its education agents and third parties will:
 - 1.1.1. Only advertise and promote AQF qualifications and non-accredited training products that are on SCEI's scope of registration
 - 1.1.2. Only advertise and promote training products to prospective international students that have been CRICOS approved and listed on the CRICOS register
 - 1.1.3. Clearly distinguish nationally recognised training products from non-accredited training products
 - 1.1.4. Provide prospective and current students with current, accurate and sufficient information about fees, VET Student Loan or Government funding subsidies
 - 1.1.5. not complete an application or enrolment form for a prospective students

- 1.1.6. not complete or conduct a Language, Literacy and Numeracy (LLN) test for a prospective student
- 1.1.7. not engage in cold-calling of a person to market, advertise or promote a course and promote VET Student Loans
- 1.1.8. not offer inducements or benefits to a prospective student in any marketing practices to enrol in a training product or apply for a VET Student Loan.
- 1.2. SCEI will provide the most updated marketing material to its agents and third parties. However, SCEI will not be held liable if the latest marketing material is not used by its education agents and/or third parties.
- 1.3. Where the Marketing and / or Compliance Managers have approved written marketing material, it will be placed in the shared drive in the Marketing folder. All previous versions will be archived and the version control register updated.
- 1.4. The Marketing and/or Compliance Manager will also ensure any changes to marketing material and practices are communicated to all education agents and staff of the SCEI via email.
- 1.5. All marketing material will have a version number applied according to the PP26 Version control policy and procedures and entered into the Version Control Register.
- 1.6. All marketing material aimed at prospective international students will make it clear that transfers between registered education providers during the first six months of a student's enrolment are permitted only under exceptional circumstances and in accordance to the National Code 2018.

2. Marketing of Training Products

- 2.1. All marketing materials used by or on behalf of Southern Cross Education Institute must be approved by the Marketing and/or Compliance managers before it can be used
- 2.2. All education agents or third parties will forward marketing materials such as brochures or electronic media to SCEI for approval prior to using in marketing any training products to prospective students.
- 2.3. SCEI will ensure the marketing of its training products by education agents and third party providers is undertaken in a professional and ethical manner and maintains the integrity and reputation of SCEI and the VET sector.
- 2.4. SCEI will ensure that all marketing material meet the requirements of the Equal Opportunity Act 2010 (Vic), Equal Opportunity Act 1984 (SA) and related Laws
- 2.5. SCEI will clearly identify on all written marketing materials including electronic forms e.g. website:
 - 2.5.1. Its name
 - 2.5.2. RTO code and CRICOS provider number
 - 2.5.3. Full NTIS and CRICOS Code and Title of the Training Product
 - 2.5.4. Entry requirements including the minimum level of English language proficiency and pre-requisites (if applicable)
 - 2.5.5. Duration and mode of delivery including Practical Placement requirements (where applicable)
 - 2.5.6. Venue
 - 2.5.7. Course content
 - 2.5.8. Fees
 - 2.5.9. Assessment methods
 - 2.5.10. Entry requirements and pre-requisites
 - 2.5.11. Training services are provided to eligible persons with funds made available by Victorian, South Australia and Commonwealth Governments (which is applicable)
- 2.6. SCEI's marketing material will not:
 - 2.6.1. offer any inducements to prospective or current students
 - 2.6.2. target any vulnerable students or group who cannot complete the course
 - 2.6.3. encourage unrealistic expectations about the level of qualifications attainable and the facilities, equipment and services provided
 - 2.6.4. make any claim to approval or recognition that is inaccurate

- 2.6.5. make any misleading statements concerning the qualifications or experience of its staff
- 2.6.6. make misleading or false statements about:
- 2.6.6.1. the prospects of employment following the course
 - 2.6.6.2. automatic pathways or credits into other courses offered by another education provider
 - 2.6.6.3. licencing or registration following completion of a course

3. Use of Logos

- 3.1. SCEI acknowledges its obligations in ensuring the correct use of National and State training logos.
- 3.2. The NRT logo will only be used in accordance with its conditions of use as outlined in Schedule 4 of the Standards for Registered Training Organisations (RTOs) 2015
- 3.3. SCEI will ensure the NRT logo is not used in any marketing material for training products and services which are not associated with the Australian Qualifications Framework.
- 3.4. The Australian Qualifications Framework logo will only be used in accordance with the Conditions for the use of the Australian Qualifications Framework Logo

4. Monitoring

- 4.1. SCEI will monitor all marketing activities of its education agents and third parties using different approaches in accordance with the *PP06 Education Agent Engagement and Monitoring Policy and Procedure* and the *Education Agents Handbook*

MARKETING MATERIALS DEVELOPMENT PROCEDURES	
Development of Marketing Materials	
STEP 1 – Development of Marketing Materials	
Who	Actions
Marketing personnel /team / Graphic designer	<ul style="list-style-type: none"> a) Develop marketing and advertising templates for the various marketing and advertising strategies. b) Develop marketing materials in accordance with advertising templates. Note: Where any material contains a pull out or tear-away section, the removable section should also comply. c) Print and commence completion of 'Marketing Materials Checklist'. e) Provide 'Marketing Materials Checklist' and marketing documentation to Compliance and/or Marketing manager for approval.
STEP 2 – Authorisation of Marketing Materials	
Who	Actions
Compliance Manager	<ul style="list-style-type: none"> a) Review and approve (as appropriate) all marketing materials prior to release, completing a 'Marketing Materials Checklist'. b) Approve marketing material if it includes only the following: course title, CRICOS course code, duration, fees, location and CRICOS provider number c) Forward all documentation to marketing for implementation. d) Sign Marketing Material Checklist and print and attach the final approved version of marketing material and send to Marketing
STEP 3 – Implementation of Marketing Materials	

Who	Actions
Marketing personnel /team	<ul style="list-style-type: none"> a) Send Marketing and advertising materials for implementation/printing/distribution. c) Ensure all international education agents have been supplied with the new marketing materials
Graphic Designer	<ul style="list-style-type: none"> a) Uploads all approved marketing material onto the SCEI website
STEP 4–Recording of Marketing Materials	
Who	Actions
Principal	<ul style="list-style-type: none"> a) Files the countersigned approved Marketing Material Checklist and version of marketing material for auditing purposes

RELATED DOCUMENTS

- ASQA Nationally Recognised Training (NRT) Logo Specifications, accessed from: http://www.asqa.gov.au/verve/resources/NRT_logo_specifications_NEW.pdf
- Conditions for the use of the Australian Qualifications Framework Logo, accessed from: <http://www.aqf.edu.au/wp-content/uploads/2013/05/AQF-Logo-Conditions-for-Use-July-2011-Reissued-May-2012.pdf>
- PP29 Logo Usage Policy
- Education Agent Handbook
- PP06 Education Agent Engagement and Monitoring Policy and Procedure
- PP26 Version Control of RTO Documents Policy

LEGISLATIVE CONTEXT

- Equal Opportunity Act 1984 (SA)
- Equal Opportunity Act 2010 (Vic)
- The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, known as ‘the National Code 2018’ Standards 1 and 4
- Standards for Registered Training Organisations (RTOs) 2015; Standard 4.1
- VET Student Loans Bill 2016; Part 5, Division 5
- **2017 Standard VET Funding Contract Skills First Program; Clause 1 of Schedule 1**

RESPONSIBILITIES

Marketing and Compliance managers, responsible for:

- Review and final approval of all marketing material
- Version control and management of outdated versions
- Informing all staff, education agents and third parties of new and updated versions of marketing material and information
- Auditing of compliance with marketing procedures by SCEI staff, education agents and third parties

Business Development Manager and Officers, responsible for:

- The management and communication to staff and education agents
- Abiding by this policy and procedure in all marketing and promotional activities

Education Agents and Third Parties are responsible for:

- Practicing ethical marketing
- Abiding by this policy and procedure in all marketing and promotional activities

Author	Compliance Manager
Approved by	Chief Executive Officer
Effective date	23 January 2019
Version	9.2
Review date	January 2020