

Marketing and Advertising Policy and Procedures

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1. Purpose

The purpose of this policy is to outline the City College’s approach to ensuring it markets and advertises its courses ethically and accurately, in compliance with the *Standards for Registered Training Organisations, 2015 (SRTO 2015)* specifically Clause 4.1 and the *National Code 2018 (NC 2018)* Standard 1, 2 and 3

2. Related Documents

Education Agent Policy and Procedure
 Transfer Policy and Procedure
 Refund and Cancellation Policy and Procedure
 Complaints and Appeals Policy and Procedure
 Marketing Advertising Material Approval Form
 Release of Information Form
 Marketing Materials Annual Compliance Checklist

3. Related Legislation

ESOS Act 2000
The ESOS Regulations 2001
National Code 2018
NVR Act 2011
Standards for Registered Training Organisations (RTOs), 2015
 The Migration Act 1958
 The Migration Regulations 1994

4. Scope

1.1. This policy applies to all employees of the City College.

5. Responsibility

1.1 The Marketing Staff and CEO are responsible for the ethical and accurate marketing of the City College, and its courses.

1.2 The Marketing Staff is responsible for the annual review of all marketing materials.

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 1 of 8

6. Definitions

City College	City College
Australian Consumer Law	A national law guarantees consumer rights when buying goods and services to ensure that false or misleading information is not provided. Education services provided by City College are covered by Australian Consumer Law.
CRICOS	The Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS).
Education Agent Agreement	A legal written agreement between the City College, and the Education Agent outlining the obligations and responsibilities of both parties.
Education Agent	An education agent is a person or organization (in or outside Australia) who recruits overseas students and refers them to education providers such as City College. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services on behalf of the education provider(s).
ESOS Act	The Education Services for Overseas Students Act 2000 of the Commonwealth of Australia.
National Code 2018	The National Code of Practice for Providers of Education and Training to Overseas Students 2018, established pursuant to Part 4 of the ESOS Act.
Principal Course	The principal course refers to the main or highest level course of study to be undertaken by the international student for which a student visa has been issued. It is typically the final course of study for which the international student is granted a visa to study multiple courses in Australia.
SRTO 2015	<p>The Council of Australian Governments (COAG) Industry and Skills Council agreed to new regulatory standards for training providers and regulators—the <u><i>Standards for Registered Training Organisations (RTOs), 2015</i></u>.</p> <p>The SRTO 2015 ensures nationally consistent, high-quality training and assessment across Australia's vocational education and training (VET) system. Compliance with the SRTO 2015 is a requirement for all ASQA-registered training organisations.</p>

7. Policy Provisions

- 7.1 City College ensures the information provided to students about its services, courses, units and qualifications delivered is accurate and factual, regardless of whether the information is provided by City College directly, its brokers, online directories, agents or other authorised third parties. City College will not provide students with any false or misleading information.

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 2 of 8

- 7.2 All information must clearly distinguish between non-recognised training and nationally recognised training.
- 7.3 All information clearly distinguishes CRICOS registered courses that are offered to international students.
- 7.4 City College marketing information will enable informed choices for students by ensuring the information is clear, accurate and complies with the requirements of the *SRT0 2015* and the *NC 2018*.
- 7.5 By complying with the SRT0 2015 and the NC 2018, City College ensures adherence to consumer protection laws.
- 7.6 City College will manage and monitor its authorized Education Agents via a written agreement between both parties. This ensures that City College Education Agents will act with honesty and integrity at all times, and within the terms of the Education Agent Agreement when representing and/or acting on behalf of City College.
- 7.7 City College will not advertise and/or market courses until they have been approved on the College scope of CRICOS approved courses by the regulatory body (and on PRISMS).
- 7.8 City College advertising is factual and ethical and does not misrepresent City College training and assessment, products and other services.
- 7.9 The Admin Staff will maintain an event register of communication with education agents and City College representatives.
- 7.10 City College staff and representatives must only use marketing or advertising materials that have been approved by the Marketing Staff and/or CEO of City College.
- 7.11 The Marketing Staff will ensure that they communicate in writing with relevant City College staff, trainers, agents, representatives, and students, where relevant and appropriate when any marketing or advertising material has been amended and/or updated.
- 7.12 All marketing documentation and materials for City College must:
- 7.12.1 Include City College CRICOS Provider Number: **04234E**, and National RTO Code: **91770**,
 - 7.12.2 Ensure that the NRT logo is used only in accordance with the conditions of use as specified in the SRT0 2015.
 - 7.12.3 Include the full name and code of each relevant course/Training Product, whether it is a full qualification, a unit of competency, within a skill set, or an approved/accredited course. All assigned/approved Codes and Names are published on the National Register at: www.training.gov.au
 - 7.12.4 Be consistent with City College course training and assessment strategies.
 - 7.12.5 Include clear and accurate information consistent with the NC 2018 and the SRT0, 2015 including, associations with any other persons or organisations that City College has arrangements with for the delivery of the course, prerequisites (including English language proficiency) - for entry to the

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 3 of 8

course and any other information relevant to the College, its courses or outcomes associated with those courses.

- 7.12.6 Include relevant cost information including, but not limited to course fees and charges.
- 7.12.7 Include document version control.
- 7.12.8 Ensure that the marketing and advertising of its courses and qualifications accurately represents its training and strategies, policies, and procedures.
- 7.12.9 Include clear information about any government-funded subsidy or other financial support associated with City College's provision of training and assessment.
- 7.12.10 Refer to another person or organisation in its marketing material only where consent from that person or organisation has been obtained in writing.
- 7.12.11 Provide details of all third parties such as Education Agents who have been authorised to recruiting prospective learners on behalf of City College.

7.13 Prior to accepting an international student enrolment, City College will ensure that comprehensive, current and plain English information is available, accessible and provided to the prospective student including, but not limited to:

- 7.13.1 The requirements for an international student's acceptance into a course, including the minimum age requirements, minimum level of English language proficiency, academic/educational level and qualifications, and/ or work experience requirements, recognition of prior learning and/ or course credits, if applicable,
- 7.13.2 The CRICOS course code and title, the course description, delivery modes and methods of study including, but not limited to; face-to-face in a classroom, and/ or e-learning and any compulsory work-based training/ work placement requirements, collaborative and/ or individual research,
- 7.13.3 The course duration and scheduled breaks,
- 7.13.4 The course outcome/s and the issuance of relevant certification such as an Award, qualification and/ or Statement of Attainment,
- 7.13.5 Campus location, address, facilities, equipment and resources available to students,
- 7.13.6 Indicative course tuition and non-tuition fees, including advice on the potential for changes to fees over the duration of a course, and the registered provider's cancellation and refund policies and procedures,
- 7.13.7 The grounds on which a student's enrolment may be deferred, suspended or cancelled,
- 7.13.8 The ESOS framework, including official Australian Government material or links and access to such information and/ or materials online, and
- 7.13.9 Accommodation options and indicative costs of living in Australia.
- 7.13.10 Prior to enrolment or the commencement of training, City College provides each individual with current and accurate information that enables the individual to make informed decisions about undertaking training with City College
- 7.13.11 Course information provided prior to enrolment will provide the individual with detailed information about fees in line with *the SRTO 2015* (Clauses 5.1 to 5.3), as well as the National Code (Standard 2)
- 7.13.12 City College will obtain prior written permission from any person or organisation used as a source of comment, testimonial or picture, for any marketing and/ or other material and will always abide by the conditions of that permission.

7.14 City College will not:

- 7.14.1 Guarantee that a student will be issued with a qualification or statement of attainment or

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 4 of 8

successfully complete a training product on its scope of registration,

- 7.14.2 Draw false or misleading comparisons with other education providers and courses
- 7.14.3 Guarantee any employment or migration outcome as a result of training and/or assessment,
- 7.14.4 A training product can be completed in a manner which does not meet the relevant training product requirements or in accordance with the requirements of the *NC 2018* and the *SRT0 2015*.
- 7.14.5 Guarantee the student will secure/obtain a particular employment outcome to the course/enrolment with City College.
- 7.14.6 Guarantee that a student will be automatically accepted into another course,
- 7.14.7 Claim 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
- 7.14.8 Give any other false or misleading information or advice in relation to itself, its course or outcomes associated with the course
- 7.14.9 Knowingly recruit a student before they have completed six months of their principal course of study (Standard 7 Overseas Student Transfers).

Protection of consumer rights

- 7.15 City College ensures consumer protection laws are adhered to through the following mechanisms:
 - 7.15.1 Having all students sign a written student agreement in acknowledgement of the Terms and Conditions of their enrolment,
 - 7.15.2 Having and providing access to prospective and current students with clear and detailed information regarding Fees and charges, and the Refund and Cancellation Policy and Procedure – which are published on our website and also outlined in the International Student Handbook and contained within the City College Enrolment Application, and within the Students written Letter of Offer / Student Agreement,
 - 7.15.3 Having a Complaints and Appeals Policy documented, accessible and implemented for prospective students, current students, staff, stakeholder, employers and the public to access at any time to provide feedback and/or make a complaint and/or an appeal regarding City College products, services, staff or decisions.
- 7.16 City College ensure that it’s course information, study and student support and services are available and accessible prior to a prospective student enrolling and will also provide the prospective student with detailed information regarding the location and request options for obtaining and/or accessing and reading relevant information about such areas as – Course fees, pre-requisites, entry requirements, English and Academic requirements and Levels - in accordance with the *NC 2018* and the *SRT0 2015*.
- 7.17 City College management, staff, trainers, authorised agents, nor any other authorised third parties will not:
 - 7.17.1 Claim to secure any migration outcomes based on completing a course with City College.
 - 7.17.2 Give any other false or misleading information or advice in relation to the College, its course/s or the outcomes associated with the course.
 - 7.17.3 Knowingly recruit or seek to enrol an international student before they have completed six months of their principal course of study.
- 7.18 City College must ensure that marketing information is provided and acknowledged by its authorised agents and enrolled students that includes and ensures the following:
 - 7.18.1 City College and its agents will not engage in the recruitment and/or poaching of students who are enrolled with another provider. Education Agents are monitored as per City College ‘Education

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 5 of 8

Agents' Policy and Procedure.

7.18.2 City College will not enrol a new student from another institution who have not complete the required six months of their principal course or in courses they are enrolled/undertaking prior to commencing their principal course e.g.: within a package of courses, unless the student's enrolment conditions meet the requirements as outlined in the National Code 2018 - Standard 7, and in accordance with the City College 'Transfer Between Registered Providers policy' and procedure.

Prior to enrolling a new student applying to enrol with City College and who may be wishing to transfer from another provider, the City College Admin Manager and/or Student Support Officer are to first check the students PRISMS record to determine if the applicant student is already enrolled with another provider. The PRISMS check will provide City College Staff with a warning that the student is already enrolled in another Educational Institution.

7.19 All Student enrolment offers, and refusals issued, and the student enrolment acceptances received will be retained on the relevant students record for future reference and audit purposes.

7.20 Prior to enrolment or the commencement of the course of study, City College will provide prospective students with access and/or a copy of the relevant, current and accurate information they require in order to enable them to make informed decisions about them enrolling and possibly undertaking study and/or courses with City College.

7.21 Only refers to a person or organisation with their consent

Roles and Responsibilities

7.22 The Marketing Staff, Admin and CEO are responsible for:

7.22.1 Ensuring that the marketing and advertising of City College accurately represents its training and assessment strategies, practices and services provided, and City College's approved scope of registration (VET and CRICOS) as per the National register and PRISMS.

7.22.2 Applicants receive sufficient, current, factual and appropriate information in order to enable them to be in a position to make an informed decision about studying with City College.

7.22.3 Ensuring that all marketing materials are current, comprehensive and in plain English.

7.22.4 Ensuring that information is available and easily accessible to assist applicants prior to their enrolling or commencing study/a course with City College, including but not limited to; course fees, duration, delivery of learning and assessment methods and modes, location, entry requirements, English & Academic requirements etc.

7.22.5 Ensuring that training and assessment that leads to AQF Qualifications and Statements of Attainment are marketed and advertised separately from any other training and assessment service offered by City College

7.22.6 Ensuring that all marketing and advertising of products and services (electronic included) released for the promotion include the correct RTO Code and CRICOS registration number.

7.22.7 Ensuring that all marketing and advertising products (electronic included) released for the promotion does not contain false and/or misleading information or advice in relation to:

- Claims of association between providers

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 6 of 8

- The employment outcomes associated with a course
- Automatic acceptance into another course
- Possible migration outcomes, or
- Any other claims relating to the registered provider, its course or outcomes associated with the course.

8. Policy Information

Authorised Officer	Marketing Staff
Supporting documents, procedures & forms of this policy	Education Agent Policy and Procedure Transfer between Registered Providers Policy and Procedure Refund and Cancellation Policy and Procedure Complaints and Appeals Policy and Procedure Marketing Advertising Material Approval Form Social Media Post Checklist Release of Information Form Student Image Usage Form Marketing Materials Annual Compliance Checklist
Related Legislation and Codes of Practice	<i>ESOS Act 2000</i> <i>The ESOS Regulations 2001</i> <i>National Code 2018</i> <i>NVR Act 2011</i> <i>Standards for Registered Training Organisations (RTOs), 2015</i> The Migration Act 1958 The Migration Regulations 1994
Audience	Public

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_V.01	Approved: May 2024	Review Date: May 2025
		Page 7 of 8

9. Procedures

- 9.1** The Marketing Staff and the CEO are responsible for:
- 9.1.1** Reviewing and authorising changes, edits and updates to be made to the City College website and/or all marketing material and information in order to ensure compliance with the requirements of the NC 2018 and the SRTO 2015.
 - 9.1.2** Ensuring all City College documentation, advertising and marketing including, policies and procedures have a system in place to ensure and manage version control.
 - 9.1.3** Written approval has been secured from an individual or organization where a reference is to be made to that individual or organization in any City College documentation and/or advertising and marketing materials.
 - 9.1.4** Ensuring that staff and trainers receive written notification/information (emails acceptable) regarding any updates/changes/edits and/or any changes that affect any City College documentation, policies, and procedures, etc.
 - 9.1.5** Ensuring NO unauthorised changes are made to City College marketing materials and corporate documentation that may put City College at risk of not meeting their compliance requirements as prescribed in the NC 2018 and the SRTO 2015.
 - 9.1.6** Ensuring that City College staff **do not enrol** a student transferring from another provider if there is any **Breach to the requirements of NC 2018 - Standard 7**. Ensure that management and staff refer and comply with City College Policy and Procedures for “Transferring between Providers”.
 - 9.1.7** Ensuring that staff check the student's record on PRISMS thoroughly to confirm that all student applications and new students wishing to enrol at City College are not currently enrolled with another provider and that any/all issues and/or concerns identified are reported immediately to the Marketing Staff. Evidence and the applicant documentation are to be retained on the applicant’s/student’s record. Ensuring that **PRIOR** to City College entering into a new arrangement with another provider/Educational Institution, approval must be gained from the CEO.
 - 9.1.8** Ensuring that **NO** City College staff, trainer and/or authorised education agents engage in the recruitment/poaching of students from other providers. Any inference or poaching reported, will be fully investigated by the Marketing Staff and if confirmed, appropriate action taken.

Document History

Version #	Date	Approved by
MKG_PP_01_ V.01	June 2024	CEO

Document Name: Marketing and Advertising Policy and Procedures	RTO Code: 91770	CRICOS Code: 04234E
Version: MKG_PP_01_ V.01	Approved: May 2024	Review Date: May 2025
		Page 8 of 8