Marketing and Advertising Policy and Procedures

POLICY CODE: CR 1.7
Related Compliance Section 7
POLICY CODE: CR 1.8
Related Compliance Section 8

NATIONAL CODE OF PRACTICE FOR PROVIDERS OF EDUCATION AND TRAINING TO OVERSEAS STUDENTS 2018 STANDARD 1, 2 AND 7

1. Purpose

This policy ensures that all marketing and advertising conducted by City College, its staff, and any third parties or experts engaged on its behalf is accurate, ethical, lawful, compliant, and not misleading or deceptive in guarantees about course completion or employment outcomes. It ensures that prospective students can make informed decisions based on clear, transparent, and lawful representations of the City College's services. It aims to protect prospective and current students from being misled by inaccurate or exaggerated claims. As per Standard 1 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018, City College will ensure that advertising and marketing of AQF qualifications to prospective students are ethical, accurate and consistent with its scope of registration. City College will further ensure that the information used in all its written and online material, will not be false or misleading and always will include its Commonwealth Register of Institutions and Course for Overseas Students (CRICOS) registered name and number. Additionally, according to Standard 2, City College will ensure that the said information will be available in plain English and easily accessible to assist students. Critical with this requirement, in compliance with the conditions of use for the Nationally Recognised Training (NRT) logo.

2. Legislative Background

Compliance Requirements, Division 1 – Information and Transparency, Marketing and Advertising (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025 (Cth).
National Code of Practice for Providers of Education and Training to Overseas Students 2018 Standard 1, 2 and Standard 7.

3. Scope

This policy applies to all City College staff that is involved in the marketing and advertising of City College materials, across all mediums to recruit students in Australia.

4. Policy Statement

City College is committed to ensuring all marketing and advertising materials and activities, regardless of the medium or source, are compliant with current legislative and regulatory requirements and uphold the integrity of Australia's international education sector.

This includes all promotional content produced internally, by experts, or by third parties and ensure that the marketing and promotion of its courses and education services is not false or misleading and is consistent with Australian Consumer Law.

To meet the compliance requirements, City College ensures that:

- RTO code and full legal entity name will be clearly displayed at campuses/sites and on all written and electronic material that is used for the purpose of marketing/corresponding with students.

- City College will include their Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered name and registration number will be displayed at campuses/sites and in all written and online material that is used for marketing/corresponding with international students.
- City College will inform students of the modes of study through which the course is offered as per the course marketing material. Any changes will be firstly advised in writing to students and also signed as agreed to by students, prior to a change being made.
- City College recognises all trainees/students and clients as consumers requiring the protection afforded by legislation.
- City College will provide clients and trainees/students with the following fee information relating to courses and training so as to ensure clients and trainees/students are supplied with sufficient clear information to make valid decisions. The fee information will explain:
    - The total amount of all fees including course fees, administration fees, materials fees and any other charges.
    - Payment terms, including the timing and amount of fees to be paid and any non-refundable deposit/administration fee.
    - The nature of the guarantee given by City College to complete the training and/or assessment once the student has commenced study in their chosen qualification or course.
    - The fees and charges for additional services, include such items as issuance of a replacement qualification/Statement of attainment and the options available to students who are deemed not yet competent on completion of training and assessment, and City College fee and refund policy.

City College will follow a set of guidelines when preparing advertisements and promotional information. These guidelines include but are not limited to:

a. not provide any guarantees to students about the successful completion of training or any particular employment that is outside of the control of City College.
b. only advertise those qualifications or units of competency that are listed as current on the City College scope of registration.
c. identify qualifications in advertising by their full code and title as they appear in the training package and not to represent these qualifications or units of competency in any other way.
d. maintain a clear distinction between nationally endorsed training being offered and other training being offered by City College.
e. not integrate or confuse in any way training that is nationally endorsed with training that is not accredited.
f. use the NRT logo only in accordance with the Standards for Registered Training Organisations, Schedule 2.
g. identify City College in any marketing material by its full RTO code and legal name.
h. not refer to another person or organisation in any marketing material without obtaining prior consent and approval.
i. clearly distinguish where training and assessment is being delivered on behalf of City College by any third-party organisation.
j. include details about any government funded subsidy or other financial support arrangements associated with the provision of training and assessment.
k. not provide approval for any third-party organisation to advertise on behalf of City College unless it is appropriately specified with limitations within a written and signed agreement with the third-party organisation.
l. not provide false or misleading information about automatic acceptance into another course or migration outcome.

m. not actively seek recruitment of students studying in other RTOs and monitor closely the advertising and marketing provided by any third-party organisation on behalf of City College.
n. not provide false or misleading information in relation to course requirements when seeking to enter into a written agreement;
o. The training product can be completed in a manner that contravenes any requirement outlined in an instrument made under section 185 of the Act, including assessment volume, delivery structure, or student identifier requirements.
p. not commit to securing migration or education assessment outcomes for overseas students; and
q. not recruit students if it conflicts with its obligations under Standard 7 (Overseas Student Transfers).
r. When a third party or expert is involved in recruitment or delivery:
    i. The marketing material must explicitly identify the services being delivered by the third party or expert, including recruitment or training and assessment responsibilities.
    ii. Where the third party is an education agent, the City College ensures compliance with Standard 4 of the National Code 2018.

Procedures

Marketing Content Review

- All marketing materials (including websites, brochures, social media, emails, and print ads) are reviewed and approved by the Business Development Manager in consultation with the Compliance Manager before publication.
- A Marketing Compliance Checklist must be completed for every marketing material, campaign or promotion.

Branding and Registration References

- The RTO Code and CRICOS Code and reference to the National Register must be included in all marketing materials.
- Training product references must include the exact title and code as listed on the National Register.
- The NRT logo will not be used on City College products such as corporate stationery, business cards, building signage, mouse pads, pens, satchels, coffee cups, USB sticks and packaging around products. The NRT logo will also not be incorporated into or on the cover of learning and assessment resources supplied by City College, this includes PowerPoint presentations.

Third-Party and Expert Attribution

Where a third party or expert is responsible for recruitment or delivery:

- The marketing material must name the third party.
- The specific role (e.g., delivering, training or recruiting) must be disclosed.
- City College must retain written evidence of approval and review.

Delivery of standalone units of competency

Where City College has qualifications on its scope of registration, the core units of competency and the listed (named) elective units of competency may be offered and delivered as standalone units of competency. This means that whilst these units of competency are not individually listed on the City College scope of registration, they are approved by ASQA for delivery as standalone units and City College does not need to seek approval for the delivery of these units of competency. City College is entitled to publish advertising that promotes these standalone units of competency as individual courses.

Others

City College marketing material will be consistent with its training and assessment strategies, including any variations or additions for courses delivered to students.
City College will provide detailed information on the amount of training provided to all student cohorts.
City College will never claim that a student will be eligible for any license or accreditation as a result of training and/or assessment unless the issuer of that license or accreditation has confirmed.

Informing students of their rights and obligations

City College must inform students prior to their enrolment about their rights and obligations, about the services to be provided and about the payment of fees, other charges and refund arrangements.

Consent for Endorsements or Affiliations

City College will maintain ethical standards at all times within its marketing activities. On occasion, City College may use student testimonials for marketing. City College will ensure that appropriate consent is sought and recorded for compliance purposes. A nominated staff will contact the party via telephone, email or in-person to request for a testimonial. The nominated staff will also explain the testimonial request and give all details with regards to the time, place, audience, reason and plan for using the testimonial. City College will ensure that the testimonial is solely used for the purpose as explained to the client. All approvals are documented in the Marketing and Advertising Register.

Marketing Non-Accredited Training

When City College will promote non-accredited training,

- It will clearly distinguish between nationally recognised training and that which is not nationally recognised.
- Practices, where nationally endorsed and non-accredited training are combined within a brochure or a website, will be avoided and ideally City College would separate these course offerings into different areas of our website and other marketing material to make a clear distinction.

Guarantees and inducements

City College must not, under any circumstances—verbally or in writing—make guarantees or inducements to a VET student that:

- They will successfully complete a training product, as successful completion depends on the student's participation, demonstrated competence, and compliance with the assessment requirements. This includes statements made by staff or third-party representatives that imply guaranteed completion of training and assessment without meeting competency outcome requirements.
- The training product can be completed in a manner that contravenes any requirement outlined in an instrument made under section 185 of the Act, including assessment volume, delivery structure, or student identifier requirements.
- The training product will result in a specific job or employment outcome unless this outcome is a formally guaranteed component of a government contract or program within City College's control.
- City College maintains a zero-tolerance policy for misleading inducements and implements robust controls to ensure that staff, third parties, and marketing representatives act within ethical and legal boundaries.

Overseas Student Transfers

City College is committed to upholding the integrity of Australia's international education sector by managing overseas student transfer requests in accordance with Standard 7 of the National Code 2018. The transfer of international students

between CRICOS registered providers **during the first twelve months of their principal course for non-school students (including VET Students), from 2 October 2026 to 30 June 2027, is restricted to ensure students are making informed decisions and receiving adequate support from their provider before transitioning. From 1 July 2027**, the transfer restriction period will **revert to six months**, subject to any further legislative changes.

City College assesses all transfer requests fairly, consistently, and in a timely manner, with consideration of the student's individual circumstances, including compassionate or compelling reasons and the best interest of the student. City College ensures that students are informed of their rights to request a transfer, the conditions under which transfers may be granted, and the process for appealing a decision. All decisions are made transparently, recorded and communicated in writing, and are actioned in PRISMS as required. This policy contributes to student wellbeing and provider accountability while maintaining visa compliance and course progression integrity.

The City College makes this policy available in the **Student Handbook** and on the City College's website.

Transferring from another registered provider

City College will not knowingly enrol a student transferring from another provider during the applicable transfer restriction period unless:

- The releasing provider or course is no longer registered
- A sanction prevents continuation of the course
- The releasing provider grants and records the release in PRISMS
- The student is government sponsored, and the sponsor supports the transfer in writing.

Transferring to another registered provider

City College will consider transfer requests during the applicable transfer restriction period if:

- The student is at risk of being reported for unsatisfactory progress at the level they are studying despite intervention.
- There are compassionate or compelling circumstances.
- The course is not being delivered as agreed
- The student's reasonable expectations are not being met
- The student was misled in their decision to enrol, and the course does not meet the student's long-term goals and aspirations.
- An appeal decision (internal or external) supports or recommends the transfer.

Decision to decline the transfer request

The transfer may jeopardise the student's progression through a package of courses.

Transfers will not be granted if:

- The student seeks to avoid being reported for breach of visa conditions such as attendance and course progress requirements.
- The request is not supported by evidence of legitimate compassionate or compelling circumstances
- The student has just commenced study and not accessed the full range of training support services. In this case, the student will be requested to wait a further 4 weeks before applying for a transfer to another registered provider during which time the full range of support services will be provided to the student.

Transfer Request Process

- For a request for transfer to be considered and a letter of release provided, students must provide a valid course offer from another registered provider with the completed **Student Transfer Application Form (Course Variation Form).**
- The application, circumstances, and evidence are reviewed as per the policy.

- The outcome of the students' application is provided in writing within 10 working days of receipt of the application.
- Where a student's application is refused, the reasons for the decision and the right and process to appeal are communicated to the student in writing in accordance with the Complaints and Appeals Policy and Procedures.
- Where a student's application is approved and release is granted, City College advises the student in writing that they must contact DHA to seek advice on whether a new student visa is required. To find out more about visa requirements, students will be advised to contact DHA on 131881 or visit the following website, Explore visa options for studying in Australia
- The overseas students do not incur any cost for release. However, where a student transfers to another registered provider, any refund of course fees, where applicable, will be assessed and paid in accordance with City College's *Fees and Refunds Policy and Procedures.*
- City College waits for the applicant to access the appeals process for twenty (20) working days after the application decision is provided before making any further updates on PRISMS.
- All records relating to overseas student transfers will be kept for two (2) years after the student ceases to be an enrolled student. This includes requests for release, the assessment of the request and the decision.

Change to another course offered by City College

Students may transfer to another course offered by City College in the following circumstances:

- Where it is considered that the course that the student wishes to transfer to.
  - better meets the study capabilities of the student; and/or
  - better meets the long-term goals of the student, whether these relate to future work, education, or personal aspirations; and/or
- Where the student claims or can provide evidence that his or her reasonable expectations about the current course are not being met.

A transfer to another course within City College will not be granted where:

- The transfer may jeopardise the student's progression through a package of courses.
- The student seeks to avoid being reported for breach of visa conditions such as attendance and course progress requirements.
- The student has just commenced study and not accessed the full range of training support services. In this case, the student will be requested to wait a further 4 weeks before applying for a transfer to another registered provider during which time the full range of support services will be provided to the student.

For a request for transfer to be considered, students must complete a **Course Variation Application Form.**

5. Responsibilities

CEO: Approves overall marketing strategy and ensures compliance oversight.

Business Development Manager: Reviews and approves all marketing content.

Marketing Officer: Develops marketing and advertising material, completes the Marketing Compliance Checklists for approval and maintains Marketing and Advertising Register.

Student Support Officer: Provide accurate information and refrain from giving misleading assurances.

Compliance Manager: Monitors compliance with this policy and reviews the Marketing Material regularly.

Related Policies

- QA4.1 and 4.2 Governance and Accountability Policy and Procedures
- QA 4.3 Risk Management Policy and Procedures
- QA 4.4 Continuous Improvement Policy and Procedures
- CR1.7 Marketing and Advertising Policy and Procedures

Document History / Version Controls

Document Code	CR 1.7, 1.8		
Version	**Approval Date**	**Nature of Amendment**	**Approved By**
1.0	1st July 2025	New Policy and Procedure introduced as per Revised ASQA standards 2025	CEO
1.1	20 Nov 2025	Reviewed Roles and Responsibilities as per Organisation Chart Operational Tables were reviewed and updated in consultation with the HOD	Compliance Manager
1.2	7 Oct 2026	Updated the Overseas Student Transfer Policy to reflect the temporary extension of the transfer restriction period from six (6) months to twelve (12) months for non-school sector students from 2 October 2026 to 30 June 2027, with the restriction reverting to six (6) months from 1 July 2027, subject to legislative changes.	CEO