

## Marketing and Promotional Material Policy and Procedure HEPP66

### PURPOSE

The Threshold Standards is established by Section 58 of the Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act). The Threshold Standards comprises standards for higher education which represent the minimum acceptable requirements for the provision of higher education in or from Australia by higher education providers registered under the TEQSA Act. This policy and procedure on the use of marketing materials is required to meet Standard 7.

Ultimately, the policy and procedure are designed to ensure consistent, accurate and ethical standards are used for all marketing activities, as well as enabling prospective students to make 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 (Higher Education)'s services and performance.

### SCOPE

This policy and procedure applies to all staff of the 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

AQF	Australian Qualifications Framework
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.
Threshold Standards	Higher Education Standards Framework (Threshold Standards) 2021 represents the minimum acceptable requirements for the provision of higher education in or from Australia by higher education providers registered under the TEQSA Act.
Marketing Materials	Marketing and advertising materials refers to all materials printed or published relating to the Southern Cross Education Institute (Higher Education).
National Code	National Code of Practice for Providers of Education and Training to Overseas Students 2018
Prospective Student	A person who is considering attending the Institute but has not yet officially enrolled.
SCEI-HE	Southern Cross Education Institute (Higher Education)
Student	Active, on-campus student with a current course of enrolment with the 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.
Third Party	Any party that provides services on behalf of the registered provider but does not include a contract of employment between a registered provider and its employee.

### POLICY

1. This policy applies to all employees and agent contractors involved in the promotion of the SCEI-HE's courses.
2. SCEI-HE will ensure that all written or electronic marketing materials will:
  - 2.1 Clearly identify the organisation's trading name, registered name, ACN, CRICOS provider number and TEQSA provider number;
  - 2.2 Satisfy all regulatory and legislative requirements;
  - 2.3 Be professionally developed and appropriately approved;

- 2.4 Not give false or misleading information or advice, regardless of whether the information is provided by SCEI-HE, its agents, brokers, online directories or third parties, in relation to:
  - 2.4.1 claims of association between providers;
  - 2.4.2 the courses offered by SCEI-HE, within our scope of registration;
  - 2.4.3 the employment outcomes associated with a course;
  - 2.4.4 professional accreditation associated with a course;
  - 2.4.5 automatic acceptance into another course;
  - 2.4.6 possible migration outcomes; or
  - 2.4.7 any other claims relating to SCEI-HE, its course(s) or outcomes associated with its course(s).
- 2.5 Be committed to ensure ethical marketing of education products and services are implemented;
- 2.6 Obtain prior written permission from any person or organisation for use of their 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;
- 2.7 Clearly state course objectives, costs and expectations are clearly communicated to participants prior to commencement;
- 2.8 Will ensure any course information details 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;
- 2.9 Ensures any requirement for work-based training/placement required during the duration of the course will be outlined clearly and thoroughly; and
- 2.10 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. All marketing and advertising material is to be submitted to the Corporate Board (CB) for approval to ensure compliance with the Threshold Standard 7 and ESOS legislative requirements.
2. All materials submitted to the CB will ensure that:
  - 2.1 The material is accurate and complies with the threshold standard and ESOS requirements;
  - 2.2 Written permission has been obtained prior to using any marketing or advertising material which refers to any person or organisation;
  - 2.3 AQF qualifications are accurately represented to prospective students and that advertised outcomes are consistent with these qualifications;
  - 2.4 Only AQF qualifications that are on SCEI-HE's scope of registration are advertised;
  - 2.5 It is clearly identified where a third party is recruiting prospective students to SCEI-HE on its behalf;
  - 2.6 The material does not imply, suggest or guarantee;
    - 2.6.1 a student will successfully complete a course in the Institute's scope of registration;
    - 2.6.2 a course can be completed in a manner which does not meet the accreditation and regulatory requirements; and
    - 2.6.3 a student will obtain a particular employment outcome where this is outside the control of the SCEI-HE.
  - 2.7 SCEI-HE will provide the most updated marketing material to its agents and third parties. However, SCEI-HE will not be held liable if the latest marketing material is not used by its education agents, brokers and/or third parties;
  - 2.8 A copy of the authorised marketing and advertising material, together with any approvals, are to be kept on file by the Academic Director and/or Compliance Lead. All previous versions will be archived and the version control register updated;
  - 2.9 The printing and publishing of marketing and advertising material can only be authorised by the Chief Executive Officer;
  - 2.10 All marketing material will have a version number applied according to the Version Control Policy and Procedures and entered into the Version Control Register;
  - 2.11 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 (Standard 7).
  - 2.12 The Academic Director/Compliance Lead will ensure the correct use of logos, course titles, codes, clear statements regarding anticipated learning outcomes, fees and refunds arrangements, and the promoted

courses.

3. Regular reviews will be led by the Academic Director/Compliance Lead, to confirm their ongoing suitability and compliance with all regulatory and legislative requirements.
4. **Monitoring**  
SCEI-HE will monitor all marketing activities of its education agents and third parties using different approaches in accordance with the *Education Agent Engagement and Monitoring Policy and Procedure* and the *Education Agents Handbook*.

**Table 1: Marketing Material Development**

Who	Actions
<b>STEP 1 – Development of Marketing Material Templates</b>	
<b>Marketing Personnel/Team and Graphic Designer</b>	<ol style="list-style-type: none"> <li>a) Develop marketing and advertising templates for the various marketing and advertising strategies.</li> <li>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.</li> <li>c) Print and commence completion of <i>Marketing Materials Checklist</i>.</li> <li>d) Provide <i>Marketing Materials Checklist</i> and marketing documentation to Compliance Lead and/or Academic Director for implementation.</li> </ol>
<b>STEP 2 – Content Implementation of Marketing Materials</b>	
<b>Compliance Lead and/or Academic Director</b>	<ol style="list-style-type: none"> <li>a) Review and approve (as appropriate) all marketing materials prior to release, completing a <i>Marketing Materials Checklist</i>.</li> <li>b) Approve marketing material if it includes only the following: course title, CRICOS course code, duration, fees, location and CRICOS provider number.</li> <li>c) Sign <i>Marketing Materials Checklist</i> and print and attach the final approved version of marketing material and send to the CB.</li> </ol>
<b>STEP 3 – Approval of Marketing Materials</b>	
<b>Compliance Lead and/or Academic Director</b>	Contact the Chief Executive Officer or CB Chair to request approval at the next CB meeting.
<b>Corporate Board</b>	Review and approve of the marketing materials during the next meeting or by circular resolution.
<b>STEP 4 – Preparation of Marketing Materials</b>	
<b>Marketing Personnel/Team</b>	<ol style="list-style-type: none"> <li>a) Send Marketing and advertising materials for implementation/printing/distribution.</li> <li>b) Ensure all international education agents have been supplied with the new marketing materials.</li> </ol>
<b>Graphic Designer</b>	Uploads all approved marketing material onto the SCEI-HE website.
<b>STEP 5 – Recording of Marketing Materials</b>	
<b>Compliance Lead and/or Academic Director</b>	Files the countersigned approved <i>Marketing Materials Checklist</i> and version of marketing material for auditing purposes.

**RELATED DOCUMENTS**

Conditions for use of the AQF logo <https://www.aqf.edu.au/about/logo-and-copyright#:~:text=Image-Conditions%20for%20use%20of%20the%20AQF%20logo,consult%20the%20conditions%20of%20use>  
Education Agent Engagement and Monitoring Policy and Procedure  
Education Agent Handbook  
Logo Usage Policy



LEGISLATIVE CONTEXT
<p>Australian Consumer Law Equal Opportunity Act 2010 (Vic) Higher Education Standards Framework (Threshold Standards) 2021 National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standard 1 and 7 Tertiary Education Quality and Standards Agency Act 2011</p>
RESPONSIBILITIES
<p><b>Academic Director and Compliance Lead</b></p> <ul style="list-style-type: none"> <li>Review and final approval of all marketing material;</li> <li>Version control and management of outdated versions;</li> <li>Informing all staff, education agents and third parties of new and updated versions of marketing material and information; and</li> <li>Auditing of compliance with marketing procedures by SCEI-HE staff, education agents and third parties.</li> </ul> <p><b>Business Development Manager and Officers</b></p> <ul style="list-style-type: none"> <li>The management and communication to staff and education agents; and</li> <li>Abiding by this policy and procedure in all marketing and promotional activities.</li> </ul> <p><b>Education Agents and Third Parties</b></p> <ul style="list-style-type: none"> <li>Practicing ethical marketing; and</li> <li>Abiding by this policy and procedure in all marketing and promotional activities.</li> </ul>

DOCUMENT AND RECORD CONTROL	
<b>Created</b>	Mar 2019 (V1.0)
<b>Amended</b>	V1.1; May 2020 (V1.2); Feb 2021 (V1.3); Feb 2022 (V1.4); Jan 2024 (V1.5)
<b>Last reviewed by</b>	Quality Assurance and Compliance Unit (Jan 2024)
<b>Last approved by</b>	Quality Assurance and Compliance Manager (Jan 2024)
<b>Version</b>	1.5
<b>Effective date</b>	January 2024
<b>Next planned review</b>	January 2025