



Marketing and Promotional Materials Policy & Procedure

Introduction

Australian Technical College Western Australia (ATCWA) ensures that it has appropriate policies and procedures to ensure that its marketing and promotion in relation to its CRICOS registration is accurate, ethical and upholds the integrity of the Australian international education industry.

Purpose

To ensure that all marketing & promotional material that is undertaken on behalf of ATCWA is professional, accurate, ethical and maintains the integrity and reputation of the Australian international education industry.

Scope

This policy and procedure applies to any marketing and promotion that takes place for and/or on behalf of ATCWA and its CRICOS registered courses.

Responsibilities

Marketing, Management

Definitions

International student means international students or intending international students on a student visa under the Migration Act 1958.

Alignment	
National Code of Practice for Providers of Education and Training to Overseas Students 2017	
Part C (Section)	7.1, 7.3, 8, 9, 10.1, 10.2, 10.3, 10.4
Part D (Standard)	1.1, 1.2, 1.3
National Code of Practice for Providers of Education and Training to Overseas Students 2018	
Part B (Standard)	1.1, 1.2.1, 1.2.2, 1.2.3, 1.2.4, 1.3.1, 1.3.2, 1.4.1, 1.4.2, 1.4.3, 1.5, 2.1.1, 2.1.2, 2.1.3, 2.1.4, 2.1.5, 2.1.6, 2.1.7, 2.1.8, 2.1.9, 2.1.10, 2.1.11

Document Control

Version	Date	Author	Change Description
001	6 June 2019	ATCWA	Creation of Policy
002	4 March 2020	ATCWA	Review of Policy
003	12 February 2021	ATCWA	Review of Policy
004	<Select date>		

Policy Statement

ATCWA will ensure that all its marketing and promotional materials regarding the provision of its training and assessment services to international students on a student visa are accurate, professional, ethical and maintain the integrity and reputation of the Australian international education industry. ATCWA will ensure that all information that is provided to clients and potential clients is provided pre-enrolment and in a timely manner and that they are provided with all necessary information to make an informed choice regarding their study options. Information must include relevant information regarding ATCWA as a CRICOS registered provider and the CRICOS registered courses that ATCWA offers.

First and foremost, ATCWA must ensure that it meets the requirements for client information pre-enrolment and marketing and promotion of their underpinning registration requirements. For example, for VET courses, this would include any requirements under the Standards for Registered Training Organisations (RTOs) 2015, etc.

Prior to authorising any marketing or promotional materials or activities for release, the Chief Executive Officer or Director of Operations must confirm that:

- The organisation would not be actively recruiting a student where this clearly conflicts with Standard 7 of the National Code 2018 through the proposed marketing materials;
- The organisation's name, CRICOS provider number and, where relevant, CRICOS course codes are included on any written or online materials that ATCWA disseminates or makes publicly available for the purposes of:
 - Providing or offering to provide a course for an international student;
 - Inviting an international student to undertake or apply for a course; and/or
 - Indicating that it is able or willing to provide a course to international students.
- The information is not false or misleading and does not provide inaccurate advice in relation to:
 - Claims of association between providers or organisations that ATCWA has arrangements with for the delivery of the CRICOS registered course in which the international student intends to apply or may enrol;
 - Any work-based training an international student is or is not required to undertake as part of the CRICOS registered course;
 - Pre-requisites, including English language proficiency, for entry into the CRICOS registered course;
 - The employment outcomes associated with a course; and
 - Automatic acceptance into a course.

- Further, ATCWA must not:
 - Claim to commit to secure, for or on behalf of the international student, a migration outcome as a result of undertaking any CRICOS registered course offered by ATCWA;
 - Guarantee a successful education assessment outcome for the international student;
 - Make any other claims relating to the organisation, its course or courses and claims associated with those courses;
 - Actively recruit an international student where this conflicts with ATCWA's obligations under Standard 7 of the National Code 2018.

In relation to pre-enrolment information that must be provided as part of any marketing and promotional materials on behalf of ATCWA, the following comprehensive information must be provided that is current, in plain English and accessible to all international students. The following information must be adhered to at all times:

- The requirements for an international student's acceptance into a CRICOS registered course, including:
 - The minimum level of English language proficiency;
 - Educational qualifications;
 - Work experience required; and
 - Course credit.
- The following details about the CRICOS registered course:
 - CRICOS course code;
 - Course content;
 - Modes of study that apply to the course including any compulsory online and/or work based training;
 - Placements;
 - Other community based learning and collaborative research training arrangements;
 - Assessment methods;
 - Course duration;
 - Holiday breaks;
 - Qualification code and title;
 - Arrangements with any other providers, people or businesses who will provide the course or any part of the course; and
 - Any tuition fees and non-tuition fees, including the advice on the potential for changes to fees over the duration of the course.
- The following details about ATCWA:
 - Campus locations;
 - Facilities;
 - Equipment;
 - Learning resources available to students;
 - ATCWA's *Deferment, Suspension and Cancellation Policy & Procedure* and *Refund Policy*;

ATCWA must also provide comprehensive, accurate, current and factual information about living in Australia, including but not limited to, for example:

- Accommodation options;
- International student safety; and/or
- Indicative costs of living in Australia.

All marketing and promotional materials must be approved by Director of Operations or Marketing and Operations Manager in accordance with the *Accuracy and Integrity of Marketing Procedure* and by using the *Marketing Approval Checklist*.

Procedure

In authorising marketing and advertising:

- The Chief Executive Officer (CEO) or Director of Operations of ATCWA must ensure that all materials and activities developed for the marketing and promotion of CRICOS registered courses are approved prior to distribution. No materials or activities will be released, distributed or implemented without the CEO's or Director of Operations signature on the request for approval form / email.
- The CEO or Director of Operations must ensure that, where a person or organisation appears in ATCWA marketing and promotional materials in any form, informed consent has been obtained from the relevant party for their name or image to appear in the materials to be distributed. Where the image is a stock photo or similar, the organisation must have a license agreement or receipt for purchase where required.
- The CEO or Director of Operations must ensure that the only courses for international students on a student visa that appear in marketing and promotional activities undertaken by ATCWA with the intent of, or could be perceived as having an intent of promotion to international students on a student visa are:
 - Those courses that are registered on CRICOS for the organisation;
 - Those courses that are on the organisation's scope of registration;
 - This policy and procedure includes not promoting courses until they have been approved on CRICOS.

This policy & procedure relates to all marketing and promotional materials, documents, electronic and hard copy including, but not limited to:

- ATCWA website;
- Brochures;
- Stationery, including letterhead, business cards, emails;
- Signage (internal and external);
- Correspondence, including Letters of Offer, International Student Course Acceptance Agreements etc.;
- Compact Disks (CDs) or Digital Video Disks (DVDs);
- Any removable sections from these materials must also include the CRICOS provider code;
- Radio, television and internet advertisements;
- College and/or Course Prospectus; and
- If the Student Handbook is used to provide promotional material about the organisation (e.g., facilities and resources), it must also contain the organisation's CRICOS provider code.



Related Documents

- Marketing and Promotional Material Checklist;
- Marketing Approval Register;
- Pre Enrolment Handbook
- Student Engagement before Enrolment Policy and Procedure;
- Education Agent Policy and Procedure;