
PROCEDURE C5.1-P5.1

MARKETING AND INFORMATION PROCEDURE

1.0 INTRODUCTION

1.1 Related Policy

Marketing and Information Policy

1.2 Purpose

This procedure outlines the ABS quality assurance processes in the development and review of ABS marketing collateral and promotional activities (including collateral and activities by Third Party Partners and Education Agents).

1.3 Scope

This procedure applies to all ABS accredited and non-accredited marketing and promotional collateral used for domestic, international and offshore student recruitment, Third Party Partners, Education Agents and ABS staff.

1.4 Scope Exceptions

None.

2.0 RESPONSIBILITIES

- The Chief Marketing Officer is responsible to ensure marketing and promotional collateral is developed in line with the Marketing and Information policy and procedure.
- The Chief Marketing Officer is responsible to provide an induction and/or ongoing training Marketing team, Third Party Providers and Education Agents.
- The Chief Marketing Officer consults with the Executive Dean and Head of Compliance in the development of new marketing collateral.
- The Chief Marketing Officer signs off on collateral before it goes to the marketplace.
- The Head of Compliance leads reviews of marketing collateral and promotional activities to ensure ongoing compliance with legislative requirements.
- The Head of Compliance is responsible to report findings of the marketing and collateral reviews to the ABS Corporate Board via the Audit and Risk Committee.

- The ABS Corporate Board oversees the ABS brand and representation of ABS via its marketing and promotional collateral.

3.0 PROCEDURE

3.1 Development

1. The Chief Marketing Officer leads marketing campaigns and coordinates the development of marketing materials.
2. Third Party Partners (TPP) and Education Agents permitted under their contract to create marketing collateral must provide an initial proposal to the Chief Marketing Officer for approval. Where appropriate the Chief Marketing Officer will liaise with the Head of Compliance to ensure there are no restrictions applied to a third party partner or education agent relating to marketing collateral.
3. For marketing material and promotional activities that relate to academic program content and delivery the Executive Dean will review and ensure accurate information on content including but not limited to:
 - a. Course and unit outlines
 - b. Admission criteria
 - c. Credit and Recognition of Prior Learning
 - d. Course objectives
 - e. Career outcomes
 - f. Resources
 - g. Assessment
 - h. Facilities and learning environment
 - i. Facilitators and support services
4. In the case of non-accredited courses, the Chief Marketing Officer will liaise with the Head of Compliance to ensure that there is no impact on ABS's obligations with the Higher Education Threshold Standards Framework 2021, ESOS Framework and the Higher Education Support Act 2003.
5. The Chief Marketing Officer will oversee that the development of the marketing collateral and promotional activities and ensure:
 - a. Requirements set by the *Marketing Compliance Checklist* (refer Annexure 1) are met.
 - b. Requirements set by the Standards for Advertising, marking and Promotional materials (Refer Annexure 4).

- c. third party logos are used in line with written authorisation or published guidelines.
- d. where collateral is targeted to International Students the *ESOS requirements for Marketing Materials* (refer Annexure 2).

3.2 Approval

1. The Chief Marketing Officer provides final sign off prior to marketing collateral 'going live'; this includes collateral developed by TPP and Education Agents.

3.3 Review

1. The Head of Compliance leads the review of existing marketing collateral as part of the ABS quality assurance processes:
 - a. On an annual basis to ensure ongoing information remains current and accurate.
 - b. Where there is notification of a potential/actual breach or a complaint received.
2. The Head of Compliance is responsible to maintain current information on the ABS website as required by Standard 7.3.1 of the HESF, as outlined in *Annexure 3: Website Information Management Checklist* of this procedure.
3. Reviews of TPP and Education Agents will be performed in line with the ABS Third Party Policy and Procedure and the ABS Education Agent Appointment, Monitoring and Termination Policy and Procedure.
4. Outcomes of marketing reviews including rectification actions are reported to the Corporate Board via the Audit and Risk Committee.

4.0 DEFINITIONS

- **CRICOS** refers to Commonwealth Register of Institutions and Courses for Overseas Students.
- **ESOS** refers to Education Services for Overseas Students.
- **Education Agents** means a person or organisation, under an agreement, that promotes education programs and services to international students.
- **International Student** means a person (whether within or outside Australia) who holds or intends to hold an Australian student visa.
- **Offshore Student** means a person outside Australia that does not hold or intent to hold an Australian student visa.
- **Third Party Partner** means an organisation, other than ABS, providing education services to students on behalf of ABS via a written agreement.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- ABS Marketing and Information Policy
- ABS Education Agent Appointment, Monitoring and Termination Policy and Procedure
- ABS Third Party Policy and Procedure
- [Higher Education Threshold Standards Framework 2021](#)
- [ESOS Framework](#)
- [National Code 2018](#)
- [Higher Education Support Act 2003](#)
- [Higher Education Provider Guidelines 2021](#)
- [Competition and Consumer Act 2010](#)
- [Australian Competition and Consumer Commission \(ACCC\): False or misleading claims](#)
- [Australian Competition and Consumer Commission \(ACCC\): Social media](#)
- [Avoiding unfair business practices: A guide for businesses and legal practitioners](#)
- [Australian Association of National Advertisers Code of Ethics](#)

6.0 POLICY/PROCEDURE OWNERSHIP

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|----------------------|---|
| Policy Owner | Head of Compliance |
| Status | Reviewed February 2023 |
| Approval Authority | AIM Corporate Board |
| Date of Approval | 20 February 2023 |
| Effective Date | 22 February 2023 |
| Implementation Owner | Chief Marketing Officer |
| Maintenance Owner | Head of Compliance |
| Review Due | October 2026 |
| Content Enquiries | Head of Compliance: Aliko Voukelatos Email: avoukelatos@scenia.com.au |

7.0 AMENDMENTS

| Version | Amendment Approval (Date) | Amendment Made By (Position) | Amendment Details |
|------------|---------------------------|------------------------------|---|
| C5.0-P5.0 | 18 October 2022 | Corporate Board | New Procedure established. |
| C5.1- P5.1 | 20 February 2023 | Head of Compliance | Minor Change: Added Annexure of Minimum standards for advertising and update to Section 5 to add reference to AACNA code of ethics. |

ANNEXURE 1: MARKETING COMPLIANCE CHECKLIST

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| Document Purpose: | The checklist is used to guide and inform: <ul style="list-style-type: none"> • Development of marketing collateral for ABS and relevant Education Agents and Third Party Partners. • Quality assurance reviews. |
| Version: | 1 |
| Last updated: | 11/10/2022 |
| Items reviewed (as applicable): | <input type="checkbox"/> Website <insert url or attach screenshot> <input type="checkbox"/> Brochures <insert url or attach file> <input type="checkbox"/> Social Media <insert url or attach screenshot> <input type="checkbox"/> Course Guides <insert url or attach file> <input type="checkbox"/> Other: <insert description> <insert url or attach file> |
| ABS staff member completing checklist | <Insert> |
| Date | <Insert> |

| REPRESENTATION AND INFORMATION | | ✓ | Comments |
|--|---|--------------------------|----------|
| 1. MANDATORY PROVIDER INFORMATION HESF (2021) B1.1.3; ESOS (2000) s107; National Code (2018) 1.4 | | | |
| 1.1. | The Provider (ABS) is unambiguously identified. | <input type="checkbox"/> | |
| 1.2. | The Provider name (ABS) is referenced consistently, including variations of the name used on an everyday basis. | <input type="checkbox"/> | |
| 1.3. | The TEQSA provider identification number and provider category are listed. | <input type="checkbox"/> | |
| 1.4. | The CRICOS registered provider name and registration number are listed. | <input type="checkbox"/> | |
| 1.5. | Brand marks and disclaimers are listed and used correctly. | <input type="checkbox"/> | |
| 2. MARKETING INFORMATION HESF (2021) 7.1, 7.2; National Code (2018) 1.1-1.5, HESA 19-95 | | | |
| 2.1. | The material is consistent with Australian Consumer Law, and is not false, misleading, or deceptive | <input type="checkbox"/> | |
| 2.2. | All statements, claims and testimonials made relating to the provider and/or its services and offerings are true and accurate, and can be substantiated | <input type="checkbox"/> | |
| 2.3. | Images in the material provide a realistic representation of the study environment | <input type="checkbox"/> | |
| 2.4. | FEE-HELP reference used only on approved courses. | <input type="checkbox"/> | |
| 2.5. | Link to information relating to FEE-HELP including schedule of fees is provided. | <input type="checkbox"/> | |
| 2.6. | Permission has been obtained (and retained on file) for use of all imagery, audio, personal information, and testimonials (including owners of copyright) | <input type="checkbox"/> | |

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|---|---|--------------------------|--|
| 2.7. | Third party/ Government logos are used in line with written authorisation or published guidelines | <input type="checkbox"/> | |
| 2.8. | If applicable, reference to any association with other persons or organisations that deliver the course in which a student intends to enrol/may enrol on behalf of ABS. | <input type="checkbox"/> | |
| 2.9. | No claim is made in regard to securing a migration outcome from undertaking any course offered. | <input type="checkbox"/> | |
| 2.10. | No guarantee of a successful education assessment outcome is made | <input type="checkbox"/> | |
| 3. COURSE INFORMATION HESF (2021) 1.1, 7.1, 7.2; National Code (2018) 1.1-1.5 | | | |
| 3.1. | Accreditation status. If non accredited there is clear reference and use of disclaimers to separate it from the accredited courses offered by ABS. | <input type="checkbox"/> | |
| 3.2. | Reference to the course qualification, award and other outcomes is made | <input type="checkbox"/> | |
| 3.3. | If applicable, professional accreditation of the course is disclosed | <input type="checkbox"/> | |
| 3.4. | Details on the design, content, assessment methods, delivery mode, duration, structure, holiday breaks and outcomes of the course | <input type="checkbox"/> | |
| 3.5. | Tuition and non-tuition fees including FEE-HELP liabilities | <input type="checkbox"/> | |
| 3.6. | If registered on CRICOS; the CRICOS Course Code is added. | <input type="checkbox"/> | |
| 3.7. | Admission criteria including Pre-requisites, work experience and minimum level of English language proficiency. | <input type="checkbox"/> | |

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| Additional Notes: | |
| Rectification Actions (if applicable) | |

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|-----------------|------------------|--|
| Sign off | Name | |
| | Position | |
| | Signature | |
| Dated | | |

ANNEXURE 2: ESOS REQUIREMENTS FOR MARKETING MATERIALS

The following requirements apply for all marketing materials and promotional activities targeted to International Students:

1. The CRICOS provider code should appear in **ALL** the written and electronic publications, materials and correspondence which may be viewed by a prospective international student. This includes but is not limited to:
 - a. Every page of the website that is pertinent to international students.
 - b. Prospectus and pre-application information (if in booklet form).
 - c. Application Form.
 - d. Business cards of key personnel e.g. marketing staff.
 - e. Email signature blocks of key personnel e.g. marketing staff, recruitment staff.
 - f. Letterhead / e-mails or footer used in letters making offers to students, promoting programs or for other marketing purposes.
 - g. Marketing tools, such as banners, PowerPoint templates, flyers, etc.
 - h. Removable section of pull out or tear away sections of promotional material.
 - i. An advertisement for programs for international students in an Australian or foreign newspaper.
 - j. Information about living in Australia if it is used as a tool to market to and recruit students.
 - k. Student Handbooks and Information Guides.
2. All promotional materials used by approved Third Party Partners will carry the ABS registered business name and CRICOS provider number of the institution and if applicable the Third Party Partner's own Provider Code (if CRICOS registered) as well.
3. The promotional material will clearly indicate that the program is being delivered by the Third Party Partner and must include details about the location and facilities of Third Party Partner. If the Third Party Partner has a number of teaching sites at which the program/s may be offered, the Third Party Partner should provide information about all these locations.
4. If CRICOS registration has been applied for and has not been received, then a program must not be promoted or published until ABS advises that CRICOS registration has been approved to relative stakeholders.
5. ABS will only promote full-time study options to international students. When a publication is aimed at both domestic and international students and part-time study options are be listed, the following should be included: Note: "International students are to complete their program within the duration specified on their CoE" or "International students will undertake full-time study while enrolled in their program.
6. The ABS CRICOS provider code is 03769D.

ANNEXURE 3: WEBSITE INFORMATION MANAGEMENT CHECKLIST

As required by the Standard 7.3.1 Information Management of the Higher Education Standards Framework (Threshold Standards) 2021 and the Higher Education Provider Guidelines 2021 ABS makes the following information publicly available, easily accessible and without provision of login or contact information:

- a. The provider registered name, trading name, ABN, physical address regulatory status and CRICOS status.
- b. The AIM constitution which establishes the entity.
- c. Members of its Corporate Board and Executive Leadership Team.
- d. A statement of AIM's financial standing.
- e. Indicative total student enrolments based on recent actual enrolments (or in the case of a new course an expected range should be used).
- f. A list of all accredited higher education courses offered including estimated annual enrolments.
- g. High level organisational chart including units that delivery courses of study.
- h. Campus addresses where higher education is offered to either domestic or international students.
- i. An overview of campuses, facilities, learning resources and services provided for students.
- j. Reference to third party partnerships delivering courses on behalf of AIM
- k. The process to lodge a complaint/ appeal.
- l. Contact details for student support and enquiries.
- m. The ESOS Framework with relevant government links.
- n. For international students only: accommodation options and indicative costs of living in Australia.
- o. For FEE HELP approved courses:
 - i. The mode of delivery of each unit of study
 - ii. Whether the unit is delivered by ABS or a third party
 - iii. Whether FEE-HELP assistance is available and if any limits or conditions are imposed on ABS's approval as a HE provider.
 - iv. Schedule of student tuition fees are available at least three months before the earliest enrolment date for the unit of study.
 - v. Census dates and intake dates
 - vi. Information regarding FEE-HELP limit, eligibility criteria, link to the study assist booklet and applicable loan fees.

ANNEXURE 4: STANDARDS FOR ADVERTISING, MARKING AND PROMOTIONAL MATERIALS

ABS will ensure its advertising, marketing and promotional materials will meet the following standards:

- a. Conform to common standards of decency;
- b. Respect Aboriginal and Torres Strait Islander peoples' ways of being, knowing and doing
- c. Not encourage actions that contravene the law or relevant standards of socially responsible behaviour
- d. Only use genuine, verifiable and relevant testimonials
- e. Only portray or refer to individuals (such as through testimonials, audio, video or photographic imagery) with their prior written consent, and that this consent is retained on file
- f. Include a provision for materials prepared for particular countries/jurisdictions for which the materials have been prepared is referenced for marketing activities occurring outside of Australia.