

PROCEDURE: C1.1-P1.1

MARKETING AND INFORMATION PROCEDURE

1.0 INTRODUCTION

1.1 Related Policy

Marketing and Information Policy

1.2 Purpose

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

1.3 Scope

This procedure applies to all AIM accredited and non-accredited marketing and promotional collateral used for student recruitment by AIM staff and Third-Party Partners, if any.

1.4 Scope Exceptions

None.

2.0 RESPONSIBILITIES

1. The Chief Marketing Officer is responsible:

- for ensuring marketing and promotional collateral is developed in line with the Marketing and Information policy and procedure.
- for providing an induction and/or ongoing training to the Marketing team and Third-Party Providers.
- consulting with the Executive Director AIM and VET Compliance Manager in the development of new marketing collateral.
- approving collateral before it goes to the marketplace.

2. The VET Compliance Manager:

- leads reviews of marketing collateral and promotional activities to ensure ongoing compliance with legislative requirements that include the National Vocational Education and Training Regulator Act 2011 (NVR), the VET Quality Framework, the Standards for RTOS 2015, VET Student Loans Act 2016 and the NSW Department of Education Smart and Skilled funding requirements.

- is responsible for reporting findings of the marketing and collateral reviews to the AIM Audit and Risk Committee via the VET Governance and Risk subcommittee.
- 3. The AIM Corporate Board oversees the AIM brand and representation of AIM 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. Any Third-Party Partners (TPP) 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 VET Compliance Manager to ensure there are no restrictions applied to a third-party partner relating to marketing collateral.
3. For marketing material and promotional activities that relate to academic program content and delivery the Head of VET Product and Head of Academic Delivery 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 VET Compliance Manager to ensure that there is no impact on AIM's obligations with the National Vocational Education and Training Regulator Act 2011 (NVR), the VET Quality Framework, the Standards for RTOS 2015, the VET Student Loans Act 2016, and the NSW Department of Education Smart and Skilled funding requirements.
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. third party logos are used in line with written authorisation or published guidelines.

3.2 Approval

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

3.3 Review

1. The VET Compliance Manager leads the review of existing marketing collateral as part of the AIM 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. Reviews of TPP will be performed in line with the AIM Third Party Policy and Procedure.
3. Outcomes of marketing reviews including rectification actions are reported to the AIM Audit and Risk Committee via the VET Governance and Risk subcommittee.

4.0 DEFINITIONS

- **Marketing collateral** includes all marketing and channels such as:
 - advertising (newspaper, radio, television)
 - brochures or other hard copy publications
 - websites including the AIM website and any other sites where the AIM RTO is referred to
 - social media (Facebook, Twitter, LinkedIn, YouTube, Instagram),
 - Online Directories (Yellow pages, TrueLocal, HotFrog)
 - Online Advertisements (Google Adwords, Groupon, Scoupon), and
 - any marketing by third parties related to AIM or to any training and assessment.
- **Third Party Partner** means an organisation, other than AIM, providing education services to students on behalf of AIM via a written agreement.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- AIM Marketing and Information Policy
- [ASQA Marketing and Advertising Fact Sheet](#)
- [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](#)
- [National VET Regulator Act 2019](#)
- [VET Student Loans Act 2016](#)
- [VET Student Loans Rules 2016](#)

6.0 POLICY/PROCEDURE OWNERSHIP

Policy Owner	VET Compliance
Status	New
Approval Authority	AIM Chief Executive Officer
Date of Approval	27 January 2023
Effective Date	1 February 2023
Implementation Owner	Chief Marketing Officer
Maintenance Owner	VET Compliance
Review Due	January 2026
Content Enquiries	VET Compliance: Brenda Cleaver Email: Brenda.cleaver@aim.com.au

7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C1.0, P1.0	27 January 2023	VET Compliance and Operations	New Procedure
C1.1- P1.1	4 October 2023	VET Compliance and Operations Manager	Addition of information related to VET Student Loans (VSL)

ANNEXURE 1: MARKETING COMPLIANCE CHECKLIST

Document Purpose:	The checklist is used to guide and inform: <ul style="list-style-type: none"> • Development of marketing collateral for AIM and relevant Third-Party Partners. • Quality assurance reviews.
Version:	1.0
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>
AIM staff member completing checklist	<Insert>
Date	<Insert>

REPRESENTATION AND INFORMATION		✓	Comments
1. MANDATORY PROVIDER INFORMATION			
1.1.	AIM RTO name (legal or marketing name)	<input type="checkbox"/>	
1.2.	Registration code of AIM RTO	<input type="checkbox"/>	
1.3.	Code and title of any training product (as published on training.gov.au)	<input type="checkbox"/>	
2. MARKETING INFORMATION			
1.4.	The material is consistent with Australian Consumer Law, and is not false, misleading, or deceptive	<input type="checkbox"/>	
1.5.	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"/>	
1.6.	Images in the material provide a realistic representation of the study environment	<input type="checkbox"/>	
1.7.	Promotion of training in a general industry area may not need to reference the title or code of the training	<input type="checkbox"/>	
1.8.	Details about any VET Student Loans, government-funded subsidy or other financial support associated with the RTO's provision of training and assessment, including details about debts the learners will incur, and how those debts will be repaid are provided	<input type="checkbox"/>	
1.9.	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"/>	
1.10.	Third party/ Government logos are used in line with written authorisation or published guidelines	<input type="checkbox"/>	
1.11.	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 AIM.	<input type="checkbox"/>	

1.12.	A training product that enables learners to obtain a licensed or regulated outcome has been confirmed by the industry regulator in the jurisdiction of the advertisement and/or training and assessment.	<input type="checkbox"/>	
1.13.	Learners are not promised that they <ul style="list-style-type: none"> will successfully complete a training product on the AIM scope or will obtain a particular employment outcome 		
1.14.	AIM does not claim that a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2.		
1.15.	The NRT logo is only on webpages that are associated with nationally recognised training and the nationally recognised training (NRT) logo is used in accordance with the conditions of use, as specified in the Standards.		
3. COURSE INFORMATION			
1.16.	Accreditation status. If non accredited there is clear reference and use of disclaimers to separate it from the accredited courses offered by AIM.	<input type="checkbox"/>	
1.17.	A non-current training product is advertised only while it remains on the AIM scope of registration and has reference to the fact that it has been superseded.		
1.18.	If applicable, professional accreditation of the course is disclosed	<input type="checkbox"/>	
1.19.	Details on the design, content, assessment methods, delivery mode, duration, structure, and outcomes of the course	<input type="checkbox"/>	
1.20.	Tuition and non-tuition fees	<input type="checkbox"/>	
1.21.	Admission criteria including pre-requisites, work experience and minimum level of English language proficiency	<input type="checkbox"/>	

Additional Notes:	
Rectification Actions (if applicable)	

Sign off	Name	
	Position	
	Signature	
Dated		