

Marketing Policy and Procedures

1. Scope

This Policy and Procedure applies to the staff and contractors developing promotional and marketing information or materials or providing marketing or promotional materials to students and prospective students on behalf of Headmasters Academy Pty Ltd. This includes all material used to invite students, including overseas students to apply to study a course at Headmasters or indicate that Headmasters is able to provide a course of study to students.

2. Purpose

This Policy and Procedure is developed to outline marketing standards at Headmasters and to ensure consistency in the manner in which promotional materials are developed and communicated, through high quality marketing activities.

3. Policy Principles

- 3.1 Headmasters is committed to marketing ethically and with integrity.
- 3.2 All marketing materials will be produced in compliance with the requirements of the *Standards for Registered Training Organisations (RTOs) 2015*, the ESOS Act, the National Code of Practice for Providers of Education and Training to Overseas Students (the National Code) and any other relevant legislation.
- 3.3 The marketing and promotion of Headmasters' courses must not be false or misleading and must be consistent with Australian Consumer Law.
- 3.4 Headmasters must include its Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered name and registration number in all its written and online materials accessible for the purpose of:
 - a) Providing or offering to provide a course to an overseas student;
 - b) Inviting a student to undertake or apply for a course; or
 - c) indicating that Headmasters is able or willing to provide a course to overseas student.
- 3.5 Headmasters must, in seeking to enter into written agreements with overseas students or intending overseas students, not provide any false or misleading information on:
 - a) Its association with any other persons or organisations that Headmasters has arrangements with for the delivery of its courses in which the student intends to enrol or may apply to enrol;
 - b) Any work-based training a student is required to undertake as part of the course;
 - c) Prerequisites – including English language proficiency – for entry to the course; and

- d) Any other information relevant to Headmasters, its courses or outcomes associated with those courses.

3.6 In accordance with Clause 4.1 of the RTO Standards, Headmasters will at all times ensure all information disseminated is both factual and accurate, and

- a) Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:
- b) accurately represents the services it provides and the training products on its scope of registration
- c) includes its RTO code
- d) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained
- e) uses the NRT [Nationally Recognised Training] logo only in accordance with the conditions of use specified in Schedule 4
- f) makes clear where a third party is recruiting prospective learners for the RTO on its behalf
- g) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party
- h) distinguishes between nationally recognised training and assessment leading to the issuance of AQF [Australian Qualifications Framework] certification documentation from any other training or assessment delivered by the RTO
- i) includes the title and code of any training product, as published on the national register, referred to in that information
- j) only advertises or markets a non-current training product while it remains on the RTO's scope of registration
- k) only advertises or markets that a training product it delivers will enable learners to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised
- l) includes details about any VET [Vocational Education and Training] FEE-HELP, government-funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment
 - i. does not guarantee that: a learner will successfully complete a training product on its scope of registration, or
 - ii. a training product can be completed in a manner which does not meet the requirements of clause 1.1 and 1.2, or
 - iii. a learner will obtain a particular employment outcome where this is outside the control of the RTO.

- 3.7 Marketing staff are suitably trained regarding Headmasters' obligations under the RTO Standards and the ESOS legislative framework prior to providing information to potential students or agents.
- 3.8 Headmasters will not promise overseas students any possible migration outcome from undertaking any course offered by Headmasters.
- 3.9 Headmasters will not guarantee a successful education assessment outcome for a student or intending student.
- 3.10 Headmasters will not actively recruit a student wishing to transfer from another provider before the student has completed six months of their principal course except in circumstances permitted in the National Code, Standard 7 (Overseas Student Transfers).

4. Procedure Principles

- 4.1 All marketing material, including the Headmasters webpage will clearly identify Headmasters' legal name, RTO code and CRICOS provider code relevant to the courses being promoted.
- 4.2 Marketing materials will be appropriately tailored for the specific targeted market. The market can be by course or country or region.
- 4.3 All new marketing materials must be approved by either the Chief Executive Officer (CEO) or Director before they are used in the marketplace:
 - a) In seeking approval, a draft of the materials must be produced and provided to the CEO or Director for review.
 - b) Final approval must be received prior to using the materials in the marketplace. This final approval will be provided along with a version number for the material.
- 4.4 Marketing materials will be reviewed when a new course is updated or added to Headmasters scope of registration.
- 4.5 In order to prevent Headmasters being misrepresented by the media or unintentional and inappropriate comments being made to journalists, all contact to/from the media must be directed to the CEO or Director.
- 4.6 The CEO or Director will co-ordinate an appropriate response by liaising with relevant staff member(s).
- 4.7 If Headmasters wishes to use a staff member's or student's image or direct quotes in marketing material, written permission should be sought from the staff or student before promulgation.
- 4.8 The Headmasters website is key to Headmasters marketing activities and it will be audited biannually for the accuracy and currency of the information published. (See Website Management Policy and Procedure).

Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Responsible Officer		Campus Director	
Implementation Officers		Marketing Manager in liaison with the Marketing Team	
Review Date		June 2024	
Approved by			
TMG			
Associated Documents			
Website Management Policy and Procedure Admission Requirements Policy and Procedure			
Version	Brief Description of the changes	Date Approved	Effective Date
1.2	Policy formatted to align with the current policy template; Procedures updated with the change of the roles of approving the marketing materials;	March 2022	March 2022