

## Marketing Information Policy and Procedures

### PURPOSE

To ensure the marketing of NORTWEST's education and training services for Overseas and Domestic Students are professional, ethical, and accurate. This procedure will also ensure that NORTWEST supports and maintains the integrity and reputation of the Australian education industry.

This procedure ensures that drafting, proofing, approval and release of overseas marketing material process meets the requirements of Standard 1 of the National Code 2007, addresses consumer protection with ethical marketing and Standards 4 and 5 of the Standards for RTOs 2015.

### RESPONSIBILITY

The CEO is responsible for the implementation of this policy/procedure and to ensure that staff members are aware of its application and that staff implements the requirements.

The CEO will also ensure that all administrative staff members do NOT give false or misleading information or advice in relation to:

- Claims of association between providers,
- The employment outcomes associated with a course,
- Automatic acceptance into another course,
- Possible migration outcomes, or
- Any other claims relating to the registered provider, its course or outcomes associated with the course.

NORTWEST will not actively recruit a student where this clearly conflicts with its obligations under Standard 7 Transfer between registered providers (Standard 1.3).

### CRICOS CODE REQUIREMENTS

CRICOS provider code will appear in all NORTWEST's written and electronic publications, materials and correspondence, or indicate that overseas student does not intend the material for use. This includes but is not limited to:

- Every page of the website that is pertinent to overseas students.
- Prospectus and pre-application information (if in booklet form).
- Application Form.
- Business cards of key personnel e.g. marketing staff.
- Email signature blocks of key personnel e.g. marketing staff.
- Letterhead / e-mails or footer used in letters making offers to students, promoting courses or for other marketing purposes.
- Marketing tools, such as banners, PowerPoint template, flyers, etc.
- An advertisement for programs for overseas students in an Australian or foreign newspaper.
- Information about living in Australia if it is used as a tool to market to and recruit students.
- Student Handbooks, Information Guides and the like.
- All promotional materials for NORTWEST will carry the registered business name and CRICOS provider number
- If CRICOS registration has been applied for and has not been received, then a program will not be promoted or published anywhere in a false way as CRICOS endorsed. It will indicate that the course is being applied for and submitted to CRICOS for registration.
- NORTWEST will clearly distinguish in its marketing materials between CRICOS registered and not registered programs and between NRT training programs and non-registered programs outside its scope of registration.
- Where any material contains a pull out or tear away section, the removable section will also comply. Failure to do so constitutes an offence under section 107 of the ESOS Act.
- When a publication is aimed at both domestic and overseas students, and part-time study options are offered, the following should be included to the effect of: Note: "Overseas students are to complete their course within the duration specified on their CoE".
- Any electronic communication (eg. emails) that are sent to students offering enrolment or informing students of courses.

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- All staff are responsible to ensure the CRICOS codes are applied to the above documentation and also to any other relevant material or correspondence.

#### MARKETING INFORMATION AND PRACTICES

NORTWEST will comply with the requirements and legislation of the Australian Government and makes sure overseas students in Australia have a safe, enjoyable and rewarding place to study. Australia's laws promote quality education and consumer protection for overseas students. These laws are known as the 'ESOS framework' and they include the:

- Education Services for Overseas Students (ESOS) Act
- National Code of Practice
- Standards for RTOs 2015

#### OVERSEAS AND DOMESTIC STUDENT RECRUITMENT

NORTWEST recruits students from various countries to study in Australia. The Marketing Officers are responsible for the development of marketing strategies when required by the CEO for the recruitment of overseas students to its courses through:

- Agents - where applying this strategy.
- Exhibitions and events – as agreed to by CEO.
- Online (website).
- Directly.

#### OVERSEAS RECRUITMENT REPRESENTATIVES (AGENTS)

NORTWEST uses overseas education agents to recruit overseas students to its programs. The role of the agent is to submit a student's application to NORTWEST with all relevant supporting documents attached. The agent is responsible for providing the prospective student with accurate and comprehensive, and up to date information about the college and its courses.

NORTWEST will enter into a written agreement with each education agent engaged formally representing NORTWEST.

NORTWEST will not accept students from an education agent, or enter into an agreement with an education agent if it knows or reasonably suspects the education agent to be:

- engaged in, or to have previously been engaged in, dishonest practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Transfer between registered providers);
- facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa;
- using PRISMS to create Confirmations of Enrolment for other than a bona fide student. (Note: Agents are not permitted to use, access or in any way manipulate with the PRISMS system on behalf of NORTWEST);
- providing immigration advice where not authorised under the Migration Act to do so.

#### RESPONSIBILITIES OF NORTWEST TO ITS AGENTS

- Provide agent/s with marketing materials that comply with Government regulations.
- Ensure agents are aware of Australian Government regulations and that they comply accordingly.
- Ensure there are checks in place to monitor agents' compliance.
- If an agent is found distributing superseded materials, non approved materials or deliberately misleading clients, NORTWEST will terminate the agreement immediately by written notice.

#### EXHIBITIONS AND EVENTS

Overseas student exhibitions are displays that occur throughout the year in a number of key markets in Australia and overseas. Approval to participate in such exhibitions is required and should be sought from the CEO.

#### ONLINE (WEBSITE)

Marketing Officers are responsible for the college's online presentation and promotion of overseas courses and study opportunities via the website [www.cityinstitute.edu.au](http://www.cityinstitute.edu.au). All changes to website will be approved by CEO.

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## DIRECTLY

Directly means students contacting NORTWEST directly, rather than through an agent.

## KEY CONSIDERATIONS AND COMPLIANCE

NORTWEST will ensure that staff comply and understand the following:

- Where approved agents are used NORTWEST staff will ensure that there is a current written agreement in place
- All staff are to ensure that the policy is applied at all times
- Only release materials approved by the CEO or nominee
- Do not provide false claim of association between providers, unless there is an association and an agreement in place
- Do not give false and misleading employment outcomes associated with a course
- Always check criteria before offering acceptance into another course, do not assume automatic acceptance into the course
- Never give information on possible migration outcomes, or
- Do not provide any other claims relating to NORTWEST, its courses, or outcomes associated with the course
- If courses are delivered in other States, check that relevant endorsements or codes are provided on materials if needed

Marketing staff will receive regular professional development to ensure understanding and compliance with the policy.

## DEFINITIONS

**Agent** is referred to an overseas education agent or a migration agent (registered under the Migration Act) with whom NORTWEST enters into a written agreement and engages to formally represent NORTWEST in recruiting students for NORTWEST programs. These agents are authorised to be paid commission covered by agreement.

**PRISMS:** (The Provider Registration and Overseas Student Management System)

This is the system used to process information given to the Secretary of Department of Education by registered providers.

## REFERENCE

ESOS Act

Standard 1 of the National Code

SRTOs 2015: Standards 4 and 5

## REVISION HISTORY

Revision	Date	Description of modifications
1	December 2009	Original
2	April 2010	Added Section 1.2 (b) of the National Code Part D
3	Feb 2012	General revision – no key change
4	Nov 2014	SVP reference
5	September 2015 V2015.2	Update for Standards for RTOs 2015
6	Jan 2016	review
17.0	March 2017	Update company name, logo and footer