

Name of the Policy	PP15 Marketing Accuracy Integrity Policy and Procedure
Distribution:	All Staff
Entity relating to	<p>Stirling Institute of Australia Pty Ltd trading as</p> <ul style="list-style-type: none"> • Academy of Hypnotic Science • Stirling Institute of Counselling • Stirling Institute • Stirling Institute of Hypnotherapy • Stirling Institute of Business • Stirling Institute of Children's Services
Reference to HESG:	<p>Skills First Program Schedule 1 Clause 1.1 – 1.3</p> <p>Skills First Quality Charter Principle 3</p>
Related Documents:	<p>SIA Marketing Guidelines</p> <p>Nationally Recognised Training (NRT) Logo Specifications</p> <p>Marketing Register</p>
Statutory References	<p>National Vocational Education and Training Regulator Act 2011</p> <p>Standards for Registered Training Organisations (RTOs) 2015 Clauses 4.1, 5.1, 5.2</p> <p>National Code of Practice 2018 Standard 1</p> <p>ESOS Act 2000</p>
Legislative Context	<p>Education and Training Reform Act 2006 (Victoria)</p> <p>Victorian Guidelines for VET Providers (Victoria) Privacy Act 1988 (Commonwealth)</p> <p>Information Privacy Act 2000 (Victoria)</p> <p>Trade Practices legislation and regulations</p> <p>Australian Consumer Law (Competition and Consumer Act 2010)</p>

Table of Contents

1. Policy	3
2. Purpose	3
3. Scope	3
4. Definitions	3
5. Requirements, Process and Procedures	4
Marketing and government-funded subsidies	6
The Nationally Recognised Training Logo	6
Marketing information.....	6
6. Responsibility	7
7. Review Date	7
8. Major Version History	7

1. Policy

Stirling Institute of Australia (TOID: 21132 CRICOS: 03979M) (Stirling Institute) must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its Scope of Registration. Stirling Institute will:

- Market and advertise its products and services in an ethical, factual, accurate and clear manner;
- Market its products and services with integrity, and professionalism to avoid vague and ambiguous statements;
- Market its products and services to safeguard the interests and welfare of all clients and students;
- Not guarantee that a student will complete a training product on its Scope of Registration;
- Operate in accordance with the national protocol for marketing and advertising;
- Ensure the NRT logo is used to promote and certify National Vocational Education and Training leading to AQF qualifications or Statements of Attainment, and is used only in accordance with its conditions of use (refer to the use of NRT logo process).

2. Purpose

Stirling Institute provides accurate, factual and ethical information in its marketing and promotional materials. Stirling Institute ensures all marketing materials developed are authorised and checked for compliance prior to being placed into circulation.

3. Scope

This policy applies to all Stirling Institute staff that produce, publish and distribute marketing materials in print, electronic or internet medium and disseminate information for the purpose of recruiting students in Australia and overseas.

4. Definitions

Australian Qualifications Framework (AQF) is the framework for regulated qualifications in the Australian education and training system, as agreed by the Commonwealth, State and Territory ministerial council with responsibility for higher education.

Marketing Materials relates to all materials that promote Stirling Institute and its registered courses including but not limited to: brochure, pamphlet, website, student information pack, banner, poster, social media and advertisements.

Mode of delivery is the method adopted to deliver training and assessment, including face-to-face, online, distance, or blended methods.

Nationally Recognised Training (NRT) Logo is the logo used nationally to signify training packages and VET accredited courses.

Scope of registration refers to the training products for which an RTO is registered to issue AQF certification documentation. It allows the RTO to:

- both provide training delivery and assessment resulting in the issuance of AQF certification documentation by the RTO; and
- provide assessment resulting in the issuance of AQF certification documentation by the RTO.

Student is an active, on-campus student with a current course of enrolment with Stirling Institute. Includes a person (whether within or outside Australia) who holds a student visa as defined by the ESOS Act, but does not include students of a kind prescribed in the ESOS Regulations.

Third party is any party that provides services on behalf of the RTO but does not include a contract of employment between an RTO and its employee.

Training Product is the AQF qualification, skill set, unit of competency, accredited short course and module.

5. Requirements, Process and Procedures

Stirling Institute ensures that they are meeting the standards relating to marketing and providing accurate information in all marketing material, regardless of the channel or method used, such as:

- Advertising – (newspaper, radio, television)
- Brochures or other hard copy publications
- Websites – including Stirling Institute’s own website and any other sites where Stirling Institute is referred to
- Social media (Facebook, Twitter, LinkedIn, YouTube, Instagram)
- Online Directories (Yellow pages, TrueLocal, HotFrog)
- Online Advertisements (Google Adwords, Groupon, Scoopon), and
- Any marketing by third parties that relates to Stirling Institute or to any training and assessment that Stirling Institute provides.

The following procedure ensures accuracy and integrity of all marketing and promotional materials representing Stirling Institute. It ensures all marketing materials and practices on behalf of Stirling Institute are authorised by an appropriate person before implementation.

- 1 The Quality and Compliance Manager is responsible for ensuring all marketing information and practices are conducted in a professional manner and maintain the integrity and reputation of the industry and registered providers. This responsibility is included in their position description.
- 2 The Quality and Compliance Manager shall ensure all new material/information developed for marketing and advertising purposes is authorised prior to release.
- 3 Where a new document or information is developed by Stirling Institute, the Quality and Compliance Manager must add this to our marketing register to confirm approval. This is located on SharePoint-Dropbox.
- 4 The marketing flyers are uploaded on Trello by the originator of the material or the CEO and this is approved by the Quality and Compliance Manager. In case the originator will not have access to Trello, the Quality and Compliance Manager will be responsible for uploading the document. An electronic copy of the flyer is kept on Trello and the marketing register is updated. The approved flyer is distributed among the staff and provided to the third party for advertisement purpose.
- 5 In authorising the marketing/promotional material, the Quality and Compliance Manager shall ensure:
 - a. All marketing and advertising products, including electronic advertising, contain Stirling Institute’s TOID and/or CRICOS Code;
 - b. All marketing material does not have false or misleading information to be present within any documents or information developed by Stirling Institute;
 - c. All marketing material must accurately represent the course/s being advertised;
 - d. All marketing material includes the title and code of any training product, as published on the www.training.gov.au and where applicable the CRICOS Course Code, as published on <http://cricos.education.gov.au/>;
 - e. Only current training products on Stirling Institute’s Scope of Registration are advertised;
 - f. That if the marketing material is for domestic students, that it acknowledges in a prominent way that the training services are provided to eligible students with funds made available by the appropriate Government authority;

- g. All marketing material includes any details about financial support arrangements associated with the provision of training and assessment, if relevant;
 - h. All marketing material distinguishes between nationally recognised training and assessment leading to the issuance of AQF Certification documentation from any other training or assessment delivered;
 - i. Marketing material does not use any logo or trademarks of State or Departments without prior written approval of the State or the Departments;
 - j. That all marketing materials meet the requirements of the Equal Opportunity Act 2010 and related laws, including the provision of materials encouraging individuals with disabilities to access Government subsidised training;
 - k. Marketing and advertising of the training services to prospective students is ethical, accurate and consistent with the requirements under legislation;
 - l. The material does not guarantee that a student will complete a training product on Stirling Institute's Scope of Registration, or the training product can be completed in a manner that does not meet the requirements of all Standards/Contracts;
 - m. That material does not guarantee that a student will obtain a particular employment outcome where this is outside the control of Stirling Institute;
 - n. Where applicable, that marketing material does not guarantee that a student will obtain a migration outcome through completing a course at Stirling Institute;
 - o. Where applicable all marketing material clearly includes details about any government-funded subsidy or other financial support associated with the RTO's provision of training and assessment, including details about debts the students will incur, and how those debts will be repaid;
 - p. Where applicable, funding eligibility criteria is appropriately determined and communicated to all marketing personnel and agents;
 - q. All marketing personnel, internal and external, and Education Agents understand that NO INCENTIVES are offered to any students for applying or enrolling in a course. All Third-Party Agreements to reflect the same;
 - r. For domestic students, all prospective students are made aware in circumstances where they are accessing their Skills First Program entitlement that this may impact their access to further government subsidised training.
- 6 The Marketing Register and a copy of the new marketing material shall be placed on file and retained by Stirling Institute on SharePoint-Dropbox / Trello. This will be the responsibility of the Quality and Compliance Manager.
 - 7 Where the Quality and Compliance Manager has approved a new document or practice, they will ensure that all old versions are archived and replaced with the new material on share point and any print versions being held in Stirling Institute.
 - 8 The Quality and Compliance Manager will ensure in the event the marketing is undertaken with another organisation, all material will accurately reflect the role and registration of each organisation, and not confuse or mix the services offered.
 - 9 The CEO / Quality and Compliance Manager is responsible for ensuring all revised promotional material, and relevant documents are communicated via to all representatives of Stirling Institute.
 - 10 Third Parties are required to seek approval from Stirling Institute for any marketing and advertising to be done on behalf of Stirling Institute. In this instance, marketing material will be provided to the third party by Stirling Institute, which clearly states the role of the third party as

recruiting prospective learners on behalf of Stirling Institute and states clearly that Stirling Institute would be the education provider.

11 Stirling Institute will only advertise their courses in English.

Marketing and government-funded subsidies

- 12 Where the course being offered is under a funding subsidy; or is offered with other financial support arrangements, details must be included about:
- a. the applicable government loan or subsidy, for example, Skills First Funding;
 - b. the debt incurred by the learner, payments to be made, interest and other charges that may be incurred; and
 - c. any loss of entitlement that may occur as a result of a learner undertaking a course associated with a funding subsidy (for example, where learners are only able to access one course through a particular funding subsidy or there are restrictions on what courses may be subsidised after a learner completes their study with Stirling Institute).

The Nationally Recognised Training Logo

- 1 The Nationally Recognised Training (NRT) logo is a distinguishable mark of quality for promoting and certifying national Vocational Education and Training leading to Australian Qualifications Framework (AQF) qualifications or Statements of Attainment.
- 2 The NRT logo will only be used by Stirling Institute once authorised to do so.
- 3 Where Stirling Institute will reproduce the NRT logo in colour, it will comply with the colour requirements. Two colour reproduction uses:
 - a. Green PMS 343
 - b. Red PMS 192
- 4 Where Stirling Institute uses the NRT logo reproduced in one colour, it will reproduce the NRT Logo in Green PMS 343 or, it will be reproduced in black.
- 5 ASQA has sent Stirling Institute, all of the approved NRT Logos. These have been saved on SharePoint-Dropbox under the Marketing folder.
- 6 Stirling Institute acknowledges its obligations in ensuring the correct use of National and State training logos.
- 7 Stirling Institute ensures it complies with the Conditions for Usage of National and State training logos, as specified in:
 - a. SRTOS 2015
 - b. State Training Authority Logo Guidelines'



Marketing information

- 1 Stirling Institute's marketing information to include, but not limited to:
 - Company Name and RTO Code / CRICOS Code (where applicable)
 - NRT Logo (where applicable)
 - Full Code and title of training product including CRICOS Course Code (where applicable)
 - Length of training including breaks
 - Mode/s of delivery
 - Third party arrangements
 - Entry requirements
 - Support services provided
 - Funding entitlements / information

6. Responsibility

Quality and Compliance Manager is responsible for effective implementation and management of this policy as well as provision of information on ways to resolve complaints arising from breaches of this policy.

The CEO is responsible for both developing and updating marketing materials which may include prospectus, brochure, leaflet, and web contents.

Quality and Compliance Manager will coordinate with the web developer/CEO to ensure that hard copy contents/ changes are reflected in online/electronic contents.

The CEO has overall responsibility for the implementation and review of this policy.

Any complaints or breaches in relation to this policy should be reported to the CEO in person or by email to: info@sia.edu.au

7. Review Date

12 months from the date of this version, or as required.

8. Major Version History

Version Number	Date	Reason for change	Prepared By	Approved By
1	Sept 2016	New template, Mapping to SRTOs 2015	Quality & Compliance Manager (JS)	CEO (AW)
2	January 2017	Updated policy for Skills First Program & VSL, positions of people in charge of the area.	Quality & Compliance Manager (JS)	Director (DY)
3	September 2018	Updated policy – removed flow chart	Quality & Compliance Manager	Director (DY)
4	September 2018	Addition of CRICOS information	Quality & Compliance Manager	Director (DY)
5	December 2019	Minor changes (e.g. removed monitoring marketing of third parties, typos, included SharePoint-Dropbox).	Quality and Compliance Manager (GDS)	Director (DY)
6.0	May 2021	Reviewed Reference to HESG	Quality and Compliance Manager (GDS)	Director (DY)