

P24- Marketing

1.0 Purpose

Baxter Institute will market its services in an ethical and responsible manner. Marketing and promotional activities will maintain the integrity and reputation of the industry and the Institution. Specifically, all material for release will be edited with care and approved by the Compliance Manager. This approval is to ensure that all materials will be compliant with the requirements listed in 4.0 References.

2.0 Responsibility

The Compliance Manager, and Sales and Business Representatives are responsible for the implementation of this policy and procedure, and to ensure relevant staff members are aware of its application and implement its requirements.

The Compliance Team, IT Team, and Graphic Designer are responsible for the application of this policy and procedure.

3.0 Related Documents

- PM2-06 – Document Release Cycle
- CL141 Checklist for Marketing Materials
- CL269 Action list - change to fees courses or bundles
- P23 Audits
- P04 Managing Agents

4.0 References

- Standards for Registered Training Organisations (RTOs) 2015 – Clauses 4.1, 5.2
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 – Standard 1, 2.1
- Standard VET Funding Contract, Skills First Program – Schedule 1, Clause 1

5.0 Definitions

AQF	Australian Qualifications Framework (AQF) means 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
ASQA	Australian Skills Quality Authority (ASQA); national vocational education and training regulator
CRICOS	The Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) is a register of Australian education providers that recruit, enrol and teach overseas students
Entry Requirement	Requirements an applicant must meet in order to be enrolled in a qualification
ESOS	The Education Services for Overseas Students Act 2000 (ESOS Act) and related legislation is designed to protect the interests of Students coming to Australia on Student visas. The legislation aims to protect and enhance Australia’s reputation for quality education, to provide tuition protection and support the integrity of the Student visa program
Non-Current Qualification	A qualification that has been Superseded or Deleted and is past its teach-out period

Pre-Requisite	Requirements a student must meet before being awarded a qualification or unit
Scope	The qualifications, skills sets, accredited courses, or units of competencies an RTO is registered to assess and issue VET qualifications or Statements of Attainment for
Skills First Quality Charter	A Charter detailing what the Training Provider must do to satisfy the Victorian Department of Education's expectations
Student	An individual who is receiving, responding to and processing information in order to acquire and develop competence. This incorporates the processes of preparing and presenting for assessment
TOID	A Training Organisation ID (TOID) is a unique ID given to a Training Organisation upon registration. Also known as a Provider Number or RTO Code
training.gov.au	The official national register of information on VET in Australia
Training and Assessment Strategy	The document which details the Training Provider's plan to deliver training and assessment of a particular course, and for each cohort within that particular course
Training Product	Any qualification, skill set, accredited course, or unit delivered by Baxter Institute
VETenrol	The online application system used by Baxter Institute
VTG	Victorian Training Guarantee is a Government initiative to provide subsidised training to eligible Students.

6.0 Policy

6.1 Advertising Scope

- 6.1.1 The Compliance Team – with the Graphic Designer and IT Teams assistance – will ensure the website advertises Baxter Institute's scope correctly
- 6.1.2 The Graphic Designer - with the Compliance Team's input – will ensure marketing and promotional materials advertise Baxter Institute's scope correctly
- 6.1.3 Baxter Institute will only advertise courses listed on Baxter Institute's scope of registration with the regulator, as identified on training.gov.au (TGA)
- 6.1.4 All advertised courses must include the title and code of any training product as published on training.gov.au
- 6.1.5 Any non-current qualifications can only be advertised while the qualification remains on Baxter Institute's Scope (as per TGA)
 - See P45 Transition and teach-out arrangement for details of removing advertising related to non-current qualifications

The Development, Approval & Publishing steps are outlined in PM2-06 – Document Release Cycle

6.2 Developing Marketing and Promotional Materials

- 6.2.1 The Graphic Designer will develop marketing and promotional materials for all qualifications on scope currently being offered based on the Training and Assessment Strategy
- 6.2.2 The Graphic Designer will ensure all marketing and promotional materials are developed in line with this policy.

6.2.3 When advertising courses, Baxter Institute will:

- Include the Training Provider legal entity and/or trading name;
- Include the Training Provider Training Organisation ID (TOID);
- Use the Nationally Recognised Training (NRT) logo only as per specifications in Schedule 4 of the Standards for Registered Training Organisations (SRTO) 2015;
- Act with honesty, accuracy, integrity and responsibility;
- Abide by relevant state Equal Opportunity legislation
- Abide by Australian Consumer Law
- Distinguish clearly between training and assessment leading to an Australian Quality Framework (AQF) certification, and any other non-AQF training delivered by Baxter Institute.
- Provide the following information in the qualification Course Guides:
 - Any entry requirements or pre-requisites the applicant must meet
 - Any workplace training or assessment that must be completed as part of the course or qualification
 - Estimated duration

6.2.4 When advertising courses, Baxter Institute will not:

- Engage in false or misleading practices or make misleading claims regarding associations or comparisons with other education providers, or the quality or outcomes of the training.
- Take advantage of potentially vulnerable prospective students
- Guarantee that a learner will successfully complete a course or qualification
- Guarantee that the completion of a course or qualification will lead to an employment outcome
- Guarantee that a course or qualification can be completed in a way that contradicts the training package requirements
- Claim that a delivered training product will enable learners to obtain a licensed or regulated outcome unless this has been confirmed by the relevant industry regulator
- Refer to another person or organisation without formal and recorded consent from the person or organisation.

6.3 Approval

- 6.3.1 Once developed, all marketing and promotional materials will be reviewed by a Compliance Team Member using the **CL141 Checklist for Marketing Materials**.
- 6.3.2 Once marketing and promotional materials successfully meet CL141 Checklist for Marketing Materials standards, materials will go to the Compliance Manager for approval.

6.4 Publishing

- 6.4.1 The Graphics Designer will be responsible for publishing approved marketing and promotional materials to the website.
- 6.4.2 The Compliance Team will update the approved course date, location, duration, and fee information in VETenrol.

6.5 Revision

- 6.5.1 If and when the delivery of a course is changed in a way that requires the modification of marketing and promotional materials, **CL269 Action list - change to fees courses or bundles** is to be completed to ensure all relevant materials contain up to date information.

6.6 Auditing

- 6.6.1 The Compliance Team will schedule regular website and marketing audits to ensure all marketing and promotional materials and website information comply with this policy and procedure.
- 6.6.2 *See P23 Audits policy for further information on the audit process.*

6.7 Agent Advertising

- 6.7.1 When promoting Baxter Institute courses, education agents with written agreements with Baxter Institute must abide by the following requirements for all marketing and promotional material, or any materials used to recruit students for Baxter Institute.
- 6.7.2 Baxter Institute's legal entity name, TOID number, (and CRICOS number when advertising courses to international students) must clearly identified;
- 6.7.3 Materials must make it clear that the agent is recruiting prospective students on Baxter Institute's behalf
- 6.7.4 *For further information on agent agreements, see P04 Managing Agents*

6.8 Specific Requirements

- 6.8.1 Advertising Skills First Funded Courses:
- Baxter Institute will abide by the Skills First Quality Charter
 - Baxter Institute will only advertise funding for courses and qualifications within its funded Scope.
 - Baxter Institute will provide accurate information relating to:
 - Training requirements
 - Financial requirements
 - Training hours
 - Assessment requirements
 - Expected outcomes
 - Baxter Institute will acknowledge government funding by prominently displaying on all Course Guides or other promotional material for Skills First funded courses that 'This training is delivered with Victorian and Commonwealth Government funding'
 - Baxter Institute will publish in a prominent location on its website and keep up to date standard fees; including fees for tuition, materials, student services, or any other fees.
 - Fee information will be given the caveat 'The student tuition fees as published are subject to change given individual circumstances at enrolment'
 - Baxter Institute will publish a summary from its latest registration audit in a prominent location on its website, showing the date, scope, and outcomes.
 - Baxter Institute will only use State or Department logos or trademarks with express written approval
 - Baxter Institute will abide by the Online Delivery Restriction List
 - Brokers recruiting Skills First funded students on the RTO's behalf will:

- Declare themselves the agent/broker, not the training entity. Therefore, acting in a representative capacity.
- Declare that they are paid commission upon successful completion of all necessary units
- Have received training on Baxter Institute/Baxter domestic products
- Possess an appropriate domestic agency agreement
- Abide by all policies and procedures governing the RTO's student recruitment

6.8.2 Advertising to International Students enrolling in CRICOS courses

- Baxter Institute will include its CRICOS registered name and registration number in all marketing and promotional material
- Baxter Institute will not guarantee that the undertaking of a course or qualification will secure a migration outcome.
- Prior to enrolling an international student, Baxter Institute will make available the following information through the indicated sources:

Supplied Information	Flyer	Course Guide	VETenrol
○ Entry requirements (including level of English proficiency, qualifications, work experience)	✓	✓	
○ The CRICOS course code	✓	✓	✓
○ Mode(s) of study for the course	✓	✓	
○ Course duration and holiday breaks	✓	✓	
○ Campus locations and facilities	✓	✓	✓
○ Tuition and non-tuition fees	✓		✓
○ Grounds for deferring, suspending, or cancelling an enrolment		✓	
○ The ESOS Framework		✓	
○ Accommodation and indicative costs of living in Australia		✓	

6.9 Subcontracting

- 6.9.1 Baxter Institute does not subcontract any training or assessment activities to any other parties. If this changes, this policy will be revised to contain standards around marketing requirements for subcontractors.

7.0 Procedure

Procedure	Policy Ref	Responsible
1 Advertising Scope		
1.1 The Compliance Team will indicate to the Graphic Designer what courses are to be advertised on the website	6.1	Compliance Team Graphic Designer

Procedure	Policy Ref	Responsible
1.2 The Graphic Designer and the IT Team will build course information pages based on guidance provided by the Compliance Team		Graphic Designer IT Team
2 Development		
2.1 The Graphics Designer will develop Course Flyers for each course delivered on scope based on guidance provided by the Compliance Team	6.2	Compliance Team Graphic Designer
<ul style="list-style-type: none"> The Graphic Designer will develop materials based on the Training and Assessment Strategy and clause 6.2 of the Marketing Policy 		
3 Approval		
3.1 Developed materials sent to Compliance Team for review	6.3.1	Compliance Team
<ul style="list-style-type: none"> Compliance Team use CL141 Checklist for Marketing Materials to complete review 		
<ul style="list-style-type: none"> If materials approved, continue to Step 4 Publishing 		
<ul style="list-style-type: none"> If materials not approved, go back to Step 2 Development 		
4 Publishing		
4.1 Approved materials sent to the Graphics Designer to publish to the website	6.4	Graphics Designer
4.2 Published materials distributed to BDRs		
4.3 VETtrak Occurrence Descriptions will be updated to reflect course date, location, duration, fee information in VETenrol		Compliance Team
5 Revision		
5.1 Whenever course information is updated, the Compliance Team will complete CL269 Action list - change to fees courses or bundles to ensure all relevant information sources are updated accordingly	6.5	Compliance Team Graphic Designer IT Team
<ul style="list-style-type: none"> The Action List will be coordinated by the Compliance Team, but tasks will be allocated to the Graphics Designer and IT Teams as required 		
<ul style="list-style-type: none"> Modification of published marketing and promotional materials will follow Step 2 Development - Step 4 Publishing 		
6 Auditing		
6.1 The Compliance Team will audit information provided on the website, and published marketing and promotional materials every 6 months. See P23 Audits policy for further information	6.6	Compliance Team

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