

Marketing and Advertising Policy and Procedure

Responsible Officer	AGB Training Marketing Co-Ordinator
Approved by	Senior Management Team
Review by	Compliance Manager
Last Reviewed	March2017
Next Reviewed	July 2018

1. Purpose

To ensure that all marketing and sales conducted by AGB Training employees is conducted in an accurate, ethical and moral manner and meets all governing legislation and regulations.

2. Audience

RTO Stakeholders and Employees

3. Definition

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; national vocational education and training regulator.
Course	A program leading to the granting of a statement of attainment or 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.
Skills First Program	Skills First program is a Government initiative to provide subsidised training to eligible participants.
NVR	An essential mechanism for the regulation of vocational education and training (VET) is the national standards against which applicants/RTOs are assessed. Prior to the establishment of the national VET regulator, ASQA, the standards that applied to an RTO.
Student	Means 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.

4. Policy Statement

AGB Training Management and staff are committed to marketing its training and assessment services in an accurate, ethical and responsible manner ensuring that all clients are provided with timely and necessary information.

All marketing material must be approved by the Marketing Co-ordinator and Compliance Manager to ensure that all legislative regulations and standards are met and adhered to prior to release.

5. References

- Australian Qualification Framework (AQF) and its Policies
- Standards for Registered Training Organisations (RTOs) 2015
- ASQA General directions
- Education Services for Overseas Students Act 2000
- Education Services for Overseas Students Regulations 2001
- National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Student 2007
- VET Funding Contract Skills First Program
- Vic Roads Training Standards
- WorkSafe Training Standards

6. Overview

The key principles underpinning advertising advice are based on:

- ensuring all arrangements are consistent with the [Standards for Registered Training Organisations \(RTOs\) 2015](#) standards 4, 5 and 8, and standard 1
- ensuring all arrangements are consistent with Standard 7 of ESOS National Code 2007
- alignment with the Australian Qualifications Framework,
- appropriate authorization,
- ethical behavior and fair dealing,
- effective management and reporting,
- value for money,
- effectiveness

6.1 AGB Training ensures its marketing and advertising of the Australian Qualifications Framework (AQF) and VET qualifications to prospective clients and learners is ethical, accurate and consistent with its scope of registration.

6.2 AGB Training uses the Nationally Recognised Training (NRT) logo only in accordance with its conditions of use as permitted where there is a direct relationship to an AQF qualification and/or unit of competency as specified within training packages or VET accredited courses.

6.3 AGB Training ensures the marketing of its education and training services is undertaken in a professional manner and maintains the integrity and reputation of the industry and registered providers.

6.4 AGB Training must not give false or misleading information or advice in relation to:
i. claims of association between providers

- ii. the employment outcomes associated with a course
 - iii. automatic acceptance into another course
 - iv. possible migration outcomes, or
 - v. any other claims relating to the registered provider, its course or outcomes associated with the course.
- 6.5 AGB Training will provide learners with information prior to commencement of services including any third party arrangements affecting the delivery of training and/or assessment.
- 6.6 AGB Training will provide or make readily available information to the learner that outlines the services AGB Training will provide the learner, along with the rights and obligations of the learner and AGB Training. This information is contained in AGB Training' marketing materials, Letter of Offer and/ or Written Agreement.
- 6.7 AGB Training will ensure that where services are provided on its behalf by a third party the provision of those services is the subject of a written agreement.
- 6.8 AGB Training will be responsible for ensuring transparent and accurate information about AGB's services and performance is accessible to prospective and current learners and clients of AGB Training.
- 6.9 AGB Training must not actively recruit a student where this clearly conflicts with its obligations under Standard 7 of ESOS National Code 2007 (Transfer between registered providers).
- 6.10 AGB Training will ensure consent has been gained from another person or organisation for marketing material such as student testimonials or photos.
- 6.11 AGB Training will ensure all advertising, promotional and informative materials shall at all times convey our image as an ethical, professional, progressive, non-discriminatory and community-based educational/training organisation.
- 6.12 AGB Training does not pay, provide or offer, either directly or indirectly, Incentives to undertake government subsidised training, whether to an eligible individual or to an entity (such as an employer or social organisation).
- 6.13 AGB Training will obtain prior written permission from any person or organisation to use marketing or advertising material which refers to that person or organisation and will abide by any conditions of that permission granted by the CEO or approved delegate of that person or organisation.
- 6.14 AGB Training will acknowledge in a prominent way that training services where Skills First Government Funding or Commonwealth Government Funding is available to eligible individuals the following disclaimer will always be included
- A. "This training is delivered with Victorian and Commonwealth Government Funding, Conditions Apply"

7. Roles

- 7.1 The **Marketing Co-ordinator** shall ensure that:
- a. AGB Training markets courses within the Scope of Registration with integrity, accuracy and professionalism, avoiding vague and ambiguous statements. No false or misleading comparisons are to be drawn with any other provider or course.
 - b. AGB Training does not state or imply that courses other than those within the Scope of Registration are recognised by the registering authority.
 - c. AGB Training recruits students at all times in an ethical and responsible manner consistent with the requirements of courses.
 - d. application and selection processes are explicit and defensible and equity and access principles are observed.
 - e. The development of Marketing materials including website is overseen and monitored
 - f. All advertising produced by third (3rd) party agents are compliant with AGB Training policy and follow the approval process
 - g. The Marketing materials will advise prospective students of:
 - i. its Scope of Registration;
 - ii. application processes and selection criteria;
 - iii. fees involved in undertaking training; fees and refund policy and procedures;
 - iv. qualifications to be issued on completion or partial completion of courses;
 - v. competencies to be achieved during training;
 - vi. assessment procedures including recognition of prior learning;
 - vii. literacy and numeracy requirements;
 - viii. Complaints and Appeals Policy and Procedures;
 - ix. staff responsibilities;
 - x. facilities and equipment; and student support services.
- 7.2 The **Marketing Co-ordinator** is responsible for the implementation of the policy and procedures and to ensure that staff is aware of its application and implement its requirements.
- 7.3 Where deemed suitable by the **Marketing Co-ordinator** third party may be engaged to produce advertising materials, these materials are subject to the same procedures and in house materials and may include but are not limited to;
- a. Digital display advertising
 - b. Print media advertising
 - c. Broadcast advertising
 - d. Video advertising
 - e. Other media outside of the skills of the marketing department
- 7.4 The **Marketing Co-ordinator** shall review marketing and advertising actives quarterly through a ROI and Student Demographics report
- 7.5 The **Marketing Co-ordinator** shall develop yearly Strategic Marketing Plan including Advertising Activities and Budget Plans
- 7.6 The **Compliance Manager, Sales Manager** and **Marketing Co-ordinator** are to sign off all marketing materials.

- 7.7 The **Marketing Co-ordinator** and **Compliance Manager** will ensure marketing material does not guarantee:
- A learner will successfully complete a training product
 - A training product can be completed in a manner that does not meet Standards for RTO's 2015 - Standard 1
 - A learner will obtain a particular employment outcome where this is outside the control of the RTO
- 7.8 Approval /Authorisation for marketing materials must be gained prior to release. This approval relates to the accuracy of information contained in any promotion.
- Release for any material that is related to any joint programs or third party advertising must abide by the AGB Training approval process

8. Authorisation / Approval Process

- 8.1 In authorising marketing and advertising:
- The **Marketing Coordinator** shall ensure that written permission has been obtained by any person and organisation featured in AGB Training's marketing or advertising materials in name or image.
 - The **Marketing Coordinator** of AGB Training shall ensure that all materials developed for marketing and advertising purposes receive authorisation prior to release. The authorisation shall be applied through a photocopy, filed, and bearing a signature of the:
 - Compliance Manager** – for Marketing Templates auditing all ESOS and NVR standards and AQF compliance
 - Executive Sales Manager** – for course dates, times and target markets signoff
 - Marketing Coordinator** – for all marketing pitch and grammatical corrections
 - See 8.2 below**
 - The **Marketing Co-ordinator** shall monitor all marketing of third parties by reviewing their materials including website, social media links and all other advertising formats on a monthly bases by the marketing team.
 - The **Compliance Manager** shall ensure that the marketing and advertising of AGB Training accurately represents its training and assessment services and the AQF qualifications and statements of attainment on its scope of registration.
 - The **Compliance Manager** shall ensure that training and assessment that leads to AQF Qualifications and statements of attainment are marketed and advertised separately from any other training and assessment service offered by AGB Training.
 - The **Compliance Manager** shall ensure that all marketing and advertising products (electronic included) released for the promotion of its Domestic and International student training and assessment services includes its RTO and CRICOS registration numbers.
 - The **Compliance Manager** and **Marketing Coordinator** shall ensure that all marketing and advertising products (electronic included) released for the

promotion of its Domestic and International student training and assessment services shall not give false or misleading information or advice in relation to:

- i. claims of association between providers
- ii. the employment outcomes associated with a course
- iii. automatic acceptance into another course
- iv. possible migration outcomes, or
- v. any other claims relating to the registered provider, its course or outcomes associated with the course

8.2 All advertising materials are to be signed off using the below stamp and or be attached with the Marketing Collateral Approval Form. The stamp includes the following details;

- a. Company represents department, Compliance, Marketing or Sales
- b. Name represent authorised person signing off Compliance Manager, Sales Manager or Marketing Co-ordinator
- c. Authorised signature of person signing off
- d. Approval Date represents date of approval
- e. Repeat advertising with no changes is to be signed off by Marketing Coordinator only.

CHECK / FINAL PROOF
Company:
Name:
Authorised
Signature:
Approval Date:

9. File and recoding of Marketing Materials

- 9.1 All marketing materials must be filed both electronically and in hard copy
- 9.2 Electronic files are to be saved in the Marketing register in the correct folder in the current year folder <T:\AGB Training\Marketing Department\Marketing Register>
- 9.3 Hard copies are to be files in the signs offs lever arch folder for the corresponding year
- 9.4 All materials shall be version controlled, version whole numbers (i.e. version 1)to be update for major changes i.e. code, unit, fee, description changes, version decimal numbers (i.e. version 1.1 to version 1.2) to be updated for grammar, spelling or minor updates
- 9.5 For full instructions refer to Marketing Register Procedure.

10. Use of AGB Training Name and Logo

- 10.1 The AGB Logo is only to be associated with authorised AGB products and services.
- 10.2 The AGB Logo specifications are as follows;
 - a. For specific logo artwork instructions view AGB Training Style Guide
 - b. Colours CMYK /RGB

Grey		Orange					
C	0	R	96	C	0	R	250
M	0	G	96	M	40	G	168
Y	0	B	98	Y	100	B	49
K	80			K	0		

- 10.3 Only approved versions of the AGB Logo with company names are to be used and both elements, the words and the AGB Logo, must be used.
- 10.4 Hand-drawn approximations cannot be used, even on internal publications. At all times the dimensions and integrity of the AGB Logo must be maintained.
- 10.5 Academic staff need not seek formal approval to use the AGB Logo in conjunction with the development of PowerPoint materials if they use the approved PowerPoint template.
- 10.6 No external person or organisation may use the AGB Logo without obtaining approval from the Marketing Co-ordinator
- 10.7 If the AGB Logo is to be used with the logos of any other organisation, then such use will require written approval from other organisation and both the Marketing Co-ordinator and Compliance Manager before it can be published, distributed or otherwise made available to the public.

11. Government Logos

- 11.1 All government logos are only to be used on materials issued by the government. Written permission is to be obtained prior to distribution or publication of such materials.
- 11.2 All AGB Training staff will comply with the requirements of the Australian Qualifications Framework (AQF) and Australian Skills Quality Authority regarding the use of the AQF logo and the Nationally Recognised Training Logo (NRT) in relation to qualifications issued in the Higher Education and Vocational Education and Training sectors respectively.

12. International Marketing

- 12.1 In all international marketing materials AGB Training must clearly identify AGB Training's legal name, RTO and CRICOS number including written and electronic marketing materials. ie. "AGB Group Pty Ltd, Trading as AGB Training", RTO 21832 CRICOS 03356C
- 12.2 Examples of marketing material used for recruitment purposes could include:
- a. information about courses for domestic and overseas students including course outlines if used to market courses and recruit students;
 - b. the homepage of AGB Training's website and pages relating to student services; information about living in Australia if it is used as a tool to market to and recruit students and if it has been produced for or by AGB Training for the purpose of marketing to and recruiting students;
 - c. an advertisement for courses for students in an Australian or foreign newspaper; materials that promote and advertise courses with AGB Training (including cards which may be considered more advertisements than conventional business cards);
 - d. a letterhead, signature block or footer used in letters making offers to students, promoting courses or for other marketing purposes; and
 - e. emails that are sent to students offering enrolment or informing students of courses.

13. Fees and Charges

- 13.1 AGB Training is to publish all fees and charges. AGB Training details all fees and charges including, but not limited to:
- i. Skills First Government Funding
 - ii. Full Fee for Service Fees
 - iii. Resource/ Text book Fees
 - iv. Methods of Collection
 - v. Refund information
- 13.2 AGB Training ensures students, and where applicable the employer, are provided with information relating to fees and charged prior to enrolment
- 13.3 AGB Training ensures students are provided with information regarding eligibility for the completion of payment prior to enrolment

14. AGB employee requesting Marketing materials

Persons seeking to have materials approved in all other cases, including approval of material relating to courses delivered by AGB (including local, International and FODE learning courses) or use of Logos by or with any or issuing of media releases or referencing of AGB in media or press releases, will need to obtain prior written approval as follows. (This process may take 7-10 working days)

- 14.1 Complete and Submit a Marketing Materials Request Form ensuring to detail;
 - a. Why material is to be produced
 - b. Who is the target audience
 - c. What is type of material is to be produced
 - d. Where and how are materials to be distributed
 - e. Date materials are needed by
 - f. Course or course area materials relate to
- 14.2 The Marketing Department (Marketing Co-ordinator and Graphics Designer) will Draft Promotional Material Initial materials shall be produced within 3 weeks of initial request
- 14.3 1st draft shall be submitted to requester for approval or changes
- 14.4 If changes are needed such changes are to be made within 7 working days of review, this process shall be repeated until requester is satisfied with materials
- 14.5 Once draft reviewed and approved by the person requested the Marketing Department will submit Promotional Material for sign off from Compliance and Sales Departments, as per Advertising Procedure.
 - a. If materials requires any amendments; or If materials rejected.
 - i. Appropriate changes will be made and then resubmitted for approval, continue this process until approved by all departments
 - b. If approved Continue with production of materials, including
 - i. posting on Social Media, website etc – post to designated pages,
 - ii. In house printing – print desired number of materials ,
 - iii. Media release, external communications – email to intended recipients
 - iv. External printing- produce purchase order to be signed off by CFO and continue to order materials
- 14.6 AGB will use its best endeavours to process urgent proposals as required.

15. Media Statements

- 15.1 Media statements serve to promote positive or minimise negative media coverage of AGB Training.
- 15.2 The Marketing Coordinator and the CEO are the only staff members with authority to issue (or engage suitable external professionals to issue) media releases on behalf of AGB. All statistics and claims of fact must be verifiable and kept on file for reference.
- 15.3 Any persons wishing to issue media releases in the name of AGB or issue public relations content must obtain prior written approval from either the CEO or Marketing Co-ordinator
- 15.4 Where a media statement or letter relates directly to the academic subject area of a staff member's specialty, the staff member may, in order to establish their credentials, give the title of their appointment with AGB.
- 15.5 All staff members have the right to express their views publicly on any matter of public interest as private citizens. Statements made or letters written in this context should not include the name and address of AGB or the academic title of the author
- 15.6 If there is doubt about whether a proposed statement or letter falls within the ambit of this policy, the staff member should discuss the matter with the Marketing Coordinator or CEO.
- 15.7 AGB has a duty of care to the personal information of students and staff, which is not to be divulged to the media without consent.
- 15.8 The main intention of this policy is to ensure high-quality, consistent communication with the media, coordinated through the Marketing Department. It in no way limits:
 - a. the freedom of AGB staff to provide public comment on community affairs as individual citizens, although the AGB position should not be quoted when so doing; or
 - b. the freedom of AGB staff to provide public comment in their particular area of expertise, provided that the Marketing Coordinator and/or CEO is informed in advance and that AGB is mentioned only with the prior written approval as detailed above.

16. Publications and Promotional Materials including print and outdoor media

- 16.1 All publications and promotional material produced by AGB Training must be made identifiable with accurate and consistent use of contact details and logos. No publications or promotional material can be published, distributed or otherwise made available to the public without first complying with the Authorisation process section 8
- 16.2 Unauthorised publications or promotional materials are to be promptly referred to and investigated by the Marketing Department working closely with the Compliance Department.

17. Online – website, social media, digital Advertising

17.1 Websites

- a. RTO code 21832 and CRICOS Code 03356C must be easily identifiable.
- b. On any page that references a training product, the code and title of that training product (as published on training.gov.au) must be used.
- c. Only include the NRT logo in association with a training product that is registered on AGB Training scope of registration.

17.2 Social media—Facebook, Twitter, LinkedIn, YouTube, Instagram

- a. Social media pages must include RTO code 21832 and CRICOS Code 03356C
- b. Communication on social media, such as posts/tweets, must include RTO code 21832 and CRICOS Code 03356C
- c. Replies to comments made in response to these communications do not require RTO or CRICOS code.
- d. Where advertising on social media references a specific training product, you must include the code and title of that training product (as published on the National Register).

17.3 Online directories—Yellow Pages, True Local

- a. RTO code 21832 and CRICOS Code 03356C must be included in directory listing.

17.4 Online advertisements—Google AdWords, Groupon, Scoupon

- a. Ensure that RTO code 21832 and CRICOS Code 03356C
- b. In order to keep the number of adwords to a minimum, RTO's may choose to have a general advertisement with their RTO code, industry area of training and website address.
- c. Any specific references to training products must include the title and code of the training product as published on training.gov.au.

18. Broadcast Advertising

- 18.1 Television and radio advertising must include your RTO code 21832 this can be included as a disclaimer at the end of the advertisement.
- 18.2 If a student is speaking on behalf of AGB Training, written consent must be obtained from the student prior to publishing the advertisement.
- 18.3 Ensure that any statements made about the duration of a course are accurate. Course durations must be consistent with the amount of training identified in AGB Training's training and assessment strategies and comply with the AQF Volume of Learning requirements.
- 18.4 Ensure that any statements made about employment outcomes following completion of a course are not misleading. Generally, employment outcomes are also contingent on job interviews which may be outside the control of AGB Training.
- 18.5 Ensure that any references to nationally recognised training are associated with an AQF qualification, accredited course, skill set or unit of competency that is registered on your scope of registration

19. AGB Training Advertising Procedure

- 19.1 Review Marketing Information and develop concepts
- 19.2 If advertising is requested by a department other than sales and marketing that department must complete the Marketing Materials Request form
- 19.3 Develop and Produce marketing material content
- 19.4 Develop and Produce marketing material artwork
- 19.5 Complete and sign off on marketing materials – Compliance, Sales and Marketing Department heads
- 19.6 File completed and signed off marketing materials both hard copy and electronic file
- 19.7 Print, upload, order distribute materials

20. 3rd party advertising and student recruitment

- 20.1 The Third party is restricted to only offering recruitment and marketing services and collecting general information about prospective students.
- 20.2 The RTO will approve the third party to recruit perspective students in the following manner, in accordance with the INSERT TITLE OF 3RD PARTY POLICY
- 20.3 AGB Training will work with the third party to develop a proactive approach, to ensure that marketing by the third party has been pre-approved by the RTO, to maintain compliance, reduce ambiguity and provide clear information.
- 20.4 Marketing materials used by third parties must either be the RTO's approved marketing materials or marketing which has been approved by the RTO or marketing that is linked back to the RTO's website.
- 20.5 3RD parties are approved to market using the following channels; direct enquiries, online forms, Direct email, Print media, Letterbox drops, Social media,
- 20.6 Both parties are to agree to provide the other with links to their respective websites, social media sites and to ensure the information is in a prominent location that clearly and accurately identifies the arrangement provided by the relevant party to the other i.e. Company XYZ is certified student recruiting agent on behalf of AGB Training to recruit for the following courses Insert course title.
- 20.7 The Marketing Co-ordinator shall monitor all marketing of third parties by reviewing their materials including website, social media links and all other advertising formats on a monthly bases by the marketing team.**

Third (3rd) party advertising procedure

1. 3rd party to email all marketing materials and intended distribution channels to Marketing Co-ordinator
2. Marketing Co-ordinator to review all materials and channels developed by the 3rd party ensuring they meet AGB Training policy, guidelines and compliance
3. Marketing Co-ordinator shall follow the same procedure sat in section 13
4. Complete and signed off marketing materials shall be filed and distributed as per section 8
5. Upon approval, materials shall be emailed back to 3rd for distribution

Relevant Linked documents

Marketing Material Request Form
PowerPoint Template
Style Guide
3rd party link with RD policy
Marketing Register procedure
Marketing Collateral Approval Form