



Marketing and Advertising Policy and Procedure

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Version Control

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08/2016	1.1	Newly created	Shashank Vuppala
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1. Purpose

This policy outlines a consistent approach in the marketing and promotion of Queensford College training products and services in accordance with Clause 4.1 of Standards for Registered Training Organisations (RTOs) 2015, Standards 1 and 4 of the ESOS National Code 2018 and Australian Consumer Law (ACL). This policy aims to ensure processes associated with marketing and promotions are implemented with integrity and accuracy to enable informed choices by clients/learners.

2. Scope

The policy applies to the ethical promotion, marketing and advertising of Queensford College's training and assessment services both digitally and in print media. This policy applies to the provision of marketing information for all training products on the organisation's scope of registration. Further, this policy also applies to third parties, including education agents, and Queensford College internal staff.

3. Responsibility

- **Head of Marketing**
 - Ensures that promotional materials, representations, and services are consistent with the scope of the business, including scope of registration and scale of operation, to meet the required standard expected of the business and the client.
 - Responsible for ensuring the policy is developed, communicated, and implemented across campuses.
- **Marketing Manager**
 - Ensures the development of marketing and advertising content for each training program is completed in collaboration with the relevant department/s and industry experts.
 - Responsible for the overall monitoring of marketing and advertising process, strategy, content creation, and materials.
- **Content Creators and Marketing Assistants**
 - Discuss any proposed marketing activities with the Marketing Manager prior to any marketing project beginning commencement.
 - Ensures all marketing content is developed and checked prior to publication with the relevant department/s and industry experts, and in accordance with all relevant regulatory standards (VET Quality Framework, CRICOS), State or Federal funding agreements and Queensford College's internal policies/procedures.
 - Ensures all advertising content is developed and checked prior to publication in accordance with all relevant regulatory requirements and this policy by completing the Advertising Compliance Checklist.
- **Department Heads and Industry Experts**
 - Collaborates with content creators and marketing assistants to ensure all marketing collaterals meet the standards and requirements set by their respective industries.
 - Reviews work and provides insights into the marketing collaterals developed and strategies utilised.
 - Approved personnel can include;
 - Trainers and Assessors
 - Course Coordinators
 - Campus/ Compliance Managers

- For information on who is responsible for each industry and department, contact the Head of Marketing.
- Compliance Department
 - Conducts quality reviews of published marketing collateral to monitor compliance with regulatory requirements, contract requirements, and Queensford College’s internal policies/procedures.

4. Compliance Mapping

Clause/standard	Requirement
Standard 4.1 of the Standards for RTOs 2015	Accurate and accessible information about an RTO, its services and performance is available to inform prospective and current learners and clients.
Standard 1 of the National Code 2018	Marketing information and practices
Standard 2 of the National Code 2018	Recruitment of an overseas student
Standard 4 of the National Code 2018	Education Agents
QLD Skills Assure Program and Supplier Policy Documents for Certificate 3 Guarantee, User Choice, Higher Level Skills, Vocational Education and Training in Schools (VETiS) Skills Assure Supplier Marketing and Disclosure Directive	Accurate information about subsidised training, with QLD funding program type-specific requirements are included in electronic and print media in accordance with the Skills Assure Marketing and disclosure directive
Australian Consumer Law (ACL)	ACL is part of the Competition and Consumer Act 2010 (the Act) which protects consumers and ensures fair trading in Australia.

5. Definition

- **AQF Qualification** means an AQF qualification type endorsed in a training package or accredited in a VET accredited course.
- **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.
- **CRICOS** Commonwealth Register of Institutions and Courses for Overseas Students
- **Education Agent** A person or organisation (in or outside Australia) who recruits overseas students and refers them to education providers. In doing so, the education agent may provide education counselling to overseas students as well as marketing and promotion services to education providers.
- **Third party** Any party that provides services on behalf of the RTO but does not include a contract of employment between an RTO and its employee.

- **Nationally Recognised Training (NRT) Logo** means the logo used nationally to signify training packages and VET accredited courses.
- **Prospective student** A person who is considering enrolling with Queensford College but has not yet officially enrolled.
- **Recognition of Prior Learning (RPL)** means an assessment process that assesses the competency/s of an individual that may have been acquired through formal, non-formal and informal learning to determine the extent to which that individual meets the requirements specified in the training package or VET accredited courses.
- **Student** An active student enrolled with Queensford College. May include a person (whether within or outside Australia) who holds a student visa as defined by the ESOS Act.
- **Training product** means AQF qualification, skill set, unit of competency, accredited short course, and module.
- **Marketing Collateral** Materials developed for the promotion and advertising purposes of the education services.

6. Policy

6.1. General Principles

Queensford College ensures that marketing of its education and training services is professional, accurate, and maintains the integrity and reputation of the industry in accordance with the Standards for Registered Training Organisations (RTOs) 2015 and the National Code of Practice for Providers of Education and Training to Overseas Students 2018. Queensford College is subject to all relevant Consumer Protection Law that applies in any jurisdiction where it operates and ensures it honours all commitments it makes.

- 6.1.1. Queensford College enables informed choice for clients and students by providing clear and factual information, whether this is done directly or by a third party. Queensford College is responsible for all marketing or other material disseminated on its behalf, regardless of the channel or method used.
- 6.1.2. Queensford College ensures its marketing of AQF qualifications to prospective students is ethical, factual, and accurately represents the services it provides the training products on its scope of registration, and is consistent with its training and assessment strategies.
- 6.1.3. Queensford College only advertises or markets a non-current training product while it remains on the RTO's scope of registration. Marketing collateral includes any relevant currency information, such as whether the training product has been superseded or removed from the national register.
- 6.1.4. Queensford College does not provide any guarantee that:
 - A student will successfully complete a training product on its scope of registration; or
 - A training product can be completed in a manner which does not meet the requirements of the *Standards for RTOs 2015 (Cth)*; or
 - A student will obtain a particular employment outcome where this is outside the control of the College.
- 6.1.5. Queensford College will not give false or misleading information, advice or guarantees in relation to:
 - Claims of association between providers.
 - Employment outcomes associated with a course.
 - Any work-based training a student is required to undertake as part of the course.
 - Prerequisites—including English language proficiency—for entry to the course.
 - Automatic acceptance into another course.
 - Successful education assessment outcomes.
 - Possible migration outcomes.

- 6.1.6. Queensford College only advertises or markets that a training product it delivers will enable students 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.
- 6.1.7. Queensford College will include its CRICOS registered name and registration number on all written material that is disseminates or makes publicly available for the purpose of inviting, providing, or offering to provide a course to an overseas student.
- 6.1.8. Queensford College complies with the ethical codes of professional bodies it affiliates with (e.g. ANMAC, ACWA etc.)

6.2. Types of Marketing Collateral

Tier	Collateral Type	Purpose of Collateral	Typical Channels
Tier 1	Community Engagement, Updates	Share updates to the Queensford College community	Social Media, Blogs, Emails
Tier 2	Advertising	Recruit new students	Website Pages, Brochures, Flyers, Emails, Education Agents, Social Media, Ad Platforms, etc

6.3. Marketing Collateral Requirements

Mandatory Minimum Inclusions		
As a minimum, Queensford College will clearly identify on all marketing collaterals:		
1	Its Registered Name	All collaterals
2	Its RTO Code	All collaterals
3	The title and code of any training product (as per the national register) referred to in the collateral	All collaterals
4	Its CRICOS Provider Code	All collaterals when marketing to international/overseas students
5	Its CRICOS Registered Name	All collaterals when marketing to international/overseas students
6	The CRICOS Course Code	All collaterals when marketing to international/overseas students
7	Disclosure where a third party is recruiting prospective learners for the RTO on its behalf	Where applicable
8	Details of any government-funded subsidy or other financial support arrangement associated with the provision of training and assessment	Where applicable
9	Identification of non-current (i.e. superseded) training product and any relevant transition information (e.g. end dates for enrolment/course completion)	Where applicable
10	Distinction between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by Queensford College.	Where applicable* *All nationally recognised training will be identified through use of title and code of the training product (as per the national register)

Tier 2 Collaterals: Long Form/Pre-enrolment Materials

For longer form marketing collaterals (e.g. course flyers) and other pre-enrolment materials, Queensford College may include additional information to assist the prospective student in their enrolment decision, including but not limited to:

1	NRT Logo
2	Qualification Entry requirements and other entry requirements including the minimum level of English language proficiency (applicable to international students) pre-requisites and specific eligibility requirements for qualifications funded by relevant state government authorities.
3	Course information including units of competency, duration, holiday breaks and volume of learning involved.
4	Mode of delivery/study, delivery location, assessment requirements including vocational placement requirements (where applicable).
5	Fee information including tuition fees, non-tuition fees, co-contribution fees (for funded training) and the relevant refund policies.

Use of Logos

In line with the relevant legislative and contract requirements Queensford College:

NRT Logo	Only uses the NRT Logo in line with the range of situations and conditions outlined in Schedule 4 of the SRTOs 2015
Australian Qualifications Framework (AQF) Logo	Only uses the AQF logo will in accordance with the Conditions for the use of the Australian Qualifications Framework Logo
Skills Assure Identifier Logo	As a Skills Assure Supplier (SAS), uses the Skills Assure Identifier Logo in any advertising, publicity, or promotional material relating to the programs
WorkReady Logo	Includes the horizontal or vertical WorkReady logo with the Supported by Government of South Australia logo OR, in cases where there is limited space, include the statement OR 'Supported through WorkReady by the Government of South Australia' and the supported by Government of South Australia logo (not required to be co-located).
Affiliate Professional Bodies	May publish the logos of professional bodies it affiliates with on its website and marketing material.

6.4. Third Party Arrangements

- 6.4.1. Queensford College's marketing collateral will make clear where a third party is recruiting prospective students for Queensford College on its behalf.
- 6.4.2. Queensford College or its education agents will not knowingly enrol a student wishing to transfer from another provider before the student has completed six months of his or her principal course except in circumstances outlined in Standard 7 (Overseas Students Transfer). These restrictions also apply to courses taken before the principal course in a package of courses.
- 6.4.3. Marketing collateral distinguishes where Queensford College is delivering training and assessment on behalf of another RTO (internal to Queensford College or external partner RTO) or where training and assessment is being delivered on Queensford College behalf by a third party

6.5. Marketing Consent

- 6.5.1. Where Queensford College refers to another person or organisation directly (such as testimonials or photos) in marketing or advertising material, it has gained consent from the person or organisation for the use of that reference. Queensford College ensures all testimonials are true and correct before use.

- 6.5.2. For Tier 1 Marketing Collateral (simple community engagement/updates): Queensford College will notify individuals who are present at events or activities that their images or footage may be captured and used for social media or other marketing purposes. This notification will be provided via email or in-person communication, with event attendees being given the opportunity to opt out of appearing in marketing collateral.
- 6.5.3. For Tier 2 Marketing Collateral (advertising): Queensford College will obtain consent from individuals for the use of their image/footage in flyers, videos, and other promotional materials. Consent is obtained and recorded using the *Marketing Consent Form*. Completed *Marketing Consent Forms* are stored with the marketing team on the Marketing Collateral Register and are accessible through the Queensford College Marketing Manager.
- 6.5.4. Queensford College is committed to respecting individuals' privacy rights. We obtain consent for the use of personal information, including images and testimonials. Individuals are notified when their information may be used for marketing purposes, and they have the right to withdraw consent at any time. If an individual subsequently objects to the use of their information, Queensford College will promptly remove all instances of that content from its marketing materials, in compliance with relevant privacy legislation.

6.6. Funding Agreements

- 6.6.1. Queensford College will comply with all marketing directives specifically prescribed by federal or state-based funding agreements to ensure prospective students are informed of any subsidies/co-contribution fees, conditions in relation to accessing funded qualifications and details of debts incurred and how those debts will be repaid. These directives will be published and available on the website and referenced in marketing collaterals.
- 6.7. Skills Assure Supplier Requirements (*Queensland Government funded programs*)
- 6.8. As a Skills Assure Supplier (SAS), Queensford College shall comply with the requirements of marketing and disclosure directive outlined in clauses 13 and 18.7 of the SAS Agreement and performance standards 2B, D and 3B of the SAS Policy 2021–22 for Queensland VET Investment and Clause 2.2.1 of the User Choice 2021-22 Policy and/or section 4s when undertaking marketing activities towards prospective students. Promotional materials and marketing practices will comply with requirements.
- 6.9. Queensford College shall ensure that the Skills Assure Identifier is only used, copied, supplied, or reproduced for the purposes of delivering the services.
- 6.10. Queensford College implements a separate marketing collateral checklist to ensure the college as a Skills Assure Supplier complies with the marketing directive and disclosure.
- 6.11. TGSS and WorkReady Requirements (South Australia Government funded programs)
Queensford College complies with and implements the RTO Marketing Instruction prescribed by the Department for Industry and Skills, Government of South Australia. These requirements are integrated into the TGSS/WorkReady Marketing Collateral Checklist of Queensford College.
- 6.12. NSW Smart and Skilled Requirements (New South Wales Government funded programs) As a Smart and Skilled training provider, Queensford College implements a consumer protection and complaints handling system in line with the Regulator's (ASQA's) requirements, the NSW Quality Framework, and the Smart and Skilled contract.

6.7. Monitoring and Continuous Improvement

- 6.7.1. Queensford College will review this policy as required by the legislative changes or as part of changes triggered by the continuous improvement or internal/external audit.
- 6.7.2. All the marketing and promotional activities including the publication of collaterals will be centrally coordinated from its Head office in Brisbane.

- 6.7.3. Any complaint associated with its marketing and promotional activities will be managed as per the Complaints and Appeals Policy and Procedure of the College. Any improvements identified resulting from the complaint will be submitted and actioned through the Continuous Improvement Register.
- 6.7.4. The College will routinely monitor and conduct internal audit of the whole range of marketing activities including information on its website to ensure it remains current and accurate. Any identified improvements from the internal audit will be submitted and actioned through the Continuous Improvement Register.

7. Procedure

Description	Responsible Person	Timeframes	Records Location
7.1. Teir 1 Marketing Collaterals			
7.1.1. Requesting Tier 1 Marketing Collaterals	Marketing Juniors, Content Creators, Managers, Department Heads, Trainers, etc	As required	Email communication records
7.1.2. Request collaterals from Marketing Juniors, Content Creators, or Marketing Manager via email with a general direction of the desired content.	As above	As required	Email communication records
7.1.3. Create and publish Tier 1 marketing collateral	Marketing Juniors, Content Creators	1 – 2 Days	N/A
7.1.4. Monitor Tier 1 content for brand alignment	Marketing Manager	Daily	Social Media Platforms, Email communication records
7.2. Teir 2 Marketing Collaterals			
7.2.1. Requesting Tier 2 Marketing Collateral	Managers, Department Heads, etc	As required	Email communication records
7.2.2. Request collaterals from Marketing Manager via email with purpose, key messages, deadlines, approvals all clearly defined.	As above	As required	Email communication records
7.2.3. Review the request to assess feasibility and alignment with marketing strategy	Marketing Manager	Within 3-5 business days of receiving the request	Email communication records, Marketing Collateral Register
7.3. Development			
7.3.1. Develop the marketing collateral based on approved request and acquire media consent forms of all parties involved.	Marketing Assistants, Content Creators	1 - 2 weeks	N/A
7.3.2. Seek feedback and approval from Industry Experts/Department Heads	Marketing Assistants, Content Creators	Within 3-5 business days of developing the collateral	Email communication records
7.3.3. Complete Marketing Collateral Checklist for information accuracy	Marketing Assistants, Content Creators	Immediately after development	Checklist stored in Marketing Collateral Register
7.3.4. Submit marketing collateral and checklist for review	Marketing Assistants, Content Creators	Immediately after completion	Marketing Collateral Register
7.4. Review and Feedback			
7.4.1. Review collateral for compliance, accuracy, and alignment with brand	Marketing Manager	Within 3 business days of submission	Marketing Collateral Register
7.4.2. Provide feedback if not approved	Marketing Manager	Within 3 business days of review	Marketing Collateral Register
7.4.3. Revise collateral based on feedback	Marketing Assistants, Content Creators	Within 2 days of receiving feedback	N/A

7.5. Final Approval			
7.5.1.	Notify creator and requester of collateral approval status	Marketing Manager	Immediately after final approval Email communication records
7.6. Post-Approval Actions			
7.6.1.	Record approval on the Marketing Collateral Register	Marketing Assistants, Content Creators	Immediately after final approval Marketing Collateral Register
7.6.2.	Store approved collateral in SharePoint	Marketing Assistants, Content Creators	Immediately after final approval SharePoint Marketing Folder
7.6.3.	Archive previous versions and update version control	Marketing Assistants, Content Creators	Upon approval of new version SharePoint and Marketing Collateral Register
7.7. Distribution and Communication			
7.7.1.	Provide the most updated marketing material to education agents and third parties	Marketing Manager	As required SharePoint
7.7.2.	Communicate any changes to marketing material and practices to staff and agents	Head of Marketing	Immediately after approval or updates Email communication records
7.7.3.	Share marketing collateral via social media and/or email marketing	Marketing Manager, Marketing Assistants, Content Creators	As required Email communication records, Social Media Platforms, Marketing Collateral Register

8. Associated Documents

- Marketing Collateral Register
- Marketing Collateral Checklist
- Marketing Consent Form
- Skills Assure Supplier marketing directive and disclosure (for QLD only)
- TGSS/WorkReady RTO marketing instructions (for SA only)
- NSW Smart and Skilled Consumer Protection Policy and Procedure
- Complaints and Appeals Policy and Procedure
- Continuous Improvement Policy and Procedure