

PE02A Marketing Accuracy Policy & Procedures

Purpose

The purpose of this policy is to provide a framework to assist Primus English to ensure that:

- All marketing and promotional materials for the recruitment of students is of high quality and is consistent; and
- All marketing and promotional material complies with the Education Services for Overseas Students Act 2000 (ESOS Act 2000), the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 (The National Code) and ELICOS Standards 2018.

The basic principle underpinning this policy is that prospective students must be able to make informed decisions as consumers prior to enrolling at Primus English.

Legislative Base

The following legislation is applicable to this policy and procedure:

- Education Services for Overseas Students (ESOS) Act 2000
- ESOS Regulations 2001
- National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 (National Code 2018), Standards 1, 2 and 8.
- ELICOS Standards 2018

Scope

This document relates to all marketing and promotional material for Primus English courses for international students on a student visa.

Primus English as a CRICOS registered provider is also responsible for actions of agents who market, recruit and provide information to international students.

The scope of this document includes marketing materials, if any, produced by Primus English in a language other than English.

Responsibilities

The Principal Executive Officer has overall responsibility for ensuring compliance with the above legislative base and to ensure monitoring procedures are in place through internal checks.

The Operations Manager has been designated to ensure all forms of marketing adhere to compliance requirements and that old stock is destroyed. The Operations Manager is also responsible for authorizing any new marketing material or updates.

All staff members have a responsibility to be aware of the ESOS requirements and the National Code and that at no time false or misleading information is given to students.

The Operations Manager may delegate his responsibilities to another staff.

Definitions

Marketing Material: Any information or material that is directly provided to or generally accessible by prospective students for the purposes of recruitment. This material includes print advertising, leaflets and brochures, course outlines, display materials, posters, forms, newsletters, handbooks, emails and electronic materials, information on websites and multi-media presentations. More specifically, examples of marketing material used for recruitment purposes include:

- Information about courses for overseas students including course outlines if used to market and recruit students;
- Website;
- 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 Primus English for the purpose of marketing to and recruiting students;
- An advertisement for courses for international students in an Australian or foreign newspapers;
- Materials that promote and advertise courses with Primus English, including promotional cards, which are considered more advertisement than the conventional business card;
- Emails that are sent to students offering enrolment or information relating to courses

Ethical, Integrity and Accurate: Information must be true, honest and correct. All claims made must be able to be substantiated with documentation. No material should contain false or misleading information.

Professional Manner: Marketing material should reflect Primus English as a skilled educational provider, be professional, honest and accurate. All marketing material should be edited with care and reflect the knowledge and specialization of Primus English as an education provider.

Agent: Anyone who acts on behalf of Primus English, including Education Recruitment Agents

Procedures

1. Marketing materials

- 1.1. Primus English will ensure that the marketing of its education services is undertaken in a professional manner and maintains the integrity and reputation of the industry. All marketing material will be checked for compliance prior to release by the Operations Manager.
- 1.2. The Marketing Checklist will ensure that compliance requirements are met which:
 - a) Clearly identify the Primus English legal entity and CRICOS number in written marketing and other material for students, including electronic forms; and
 - b) Do not give false or misleading information or advice in relation to:
 - i. Employment outcomes associated with a course;
 - ii. Automatic acceptance into another course;
 - iii. Possible migration outcomes; or
 - iv. Any other claims relating to Primus English, its course or outcomes associated with the course.
- 1.3. Any claims made in marketing materials will be documented and substantiated
- 1.4. A statement such as “This information is correct at the time of publication but may be subject to change” should be included where applicable.
- 1.5. A disclaimer statement should also be included: “This Institute reserves the right to change details in relation to the course offered and applicants are advised to contact the Institute for current details”
- 1.6. All marketing material should display consistent information about the Institute, its facilities and the reported costs of living
- 1.7. Only approved and compliant marketing material must be used by the agents. Any material displayed by an agent must be approved by the Operations Manager.
- 1.8. Primus English staff will be advised of this Policy in internal training sessions.