

## Statutory and regulatory compliance

- National Code of Practice for Providers of Education and Training to Overseas Students 2018 Standards 1, 4, 7
- ESOS Act Section 15
- ELICOS Standards 2018 P8.1, P8.4
- Australian Consumer Law

## Related Policies

- Student Support and Welfare Services
- Staff Recruitment and Selection
- Staff Induction
- Refunds
- Applications, Offers and Enrolments
- Student Orientation
- Education Agents
- Welfare of Younger Students
- MEE Portal
- Transfer between Registered Providers

## Related Documents

- Embassy English website

## Policy

The Embassy English ethical marketing policy is designed to protect the reputation and integrity of Embassy English and of the international education industry in Australia. The policy has been developed to ensure that information which is contained in marketing materials and which is presented at marketing activities is accurate, correct and current.

This policy applies in regard to all information disseminated directly by Embassy English and to information disseminated on behalf of Embassy English by third-parties with which Embassy English has entered into an agreement. References to Embassy English marketing material are references to material which provides information about Embassy English and its courses, whether that information is disseminated by Embassy English or a third-party with whom Embassy English has entered into an agreement.

All Embassy English marketing material and the Embassy English website will present information in an ethical and responsible manner, enabling potential students to make informed decisions about studying with Embassy English in Australia. All marketing material for overseas students will include Embassy English's CRICOS provider code and will be in line with the ESOS Act. Overseas students can seek additional information from the Embassy English website or contact the Department of Home Affairs (DHA; [www.homeaffairs.gov.au](http://www.homeaffairs.gov.au)) for further information.

Using the information provided to them in marketing documents, intending students will be able to make informed decisions about which courses to undertake. They will have a clear understanding of their outcomes

All marketing documents which contain information about course outcomes and pathways will be clear and unambiguous about those outcomes and pathways.

Information provided in marketing documents will be in a format that is easy to read and written in language that is easy to understand. The Embassy' Senior Management in consultation with the Head of Compliance is responsible for checking that marketing material meets the ethical and quality standards of Embassy English.

## Procedures

The Embassy' Senior Management is responsible for ensuring that all marketing material (including the Embassy English website) is developed in an ethical and responsible way, consistent with the requirements of the Embassy English ethical marketing policy.

### Responsibility for ethical development and review of marketing material

The Embassy' Senior Management is responsible for checking the accuracy, currency and conformity of marketing material.

Information contained in marketing material about policies and procedures, course structure, course entry requirements, and educational pathways must be accurate, up-to-date and conform to the requirements of relevant legislation and regulations, TEQSA, DET, DHA and other government bodies and regulatory agencies.

All marketing material must be checked and approved by the Embassy' Senior Management before it is released for publication.

All marketing material will clearly identify Embassy English's logo, provider name and CRICOS number.

### Circumstances under which marketing material should be updated

Marketing material is updated whenever information which might influence a student's choice about studying at Embassy English changes. Such changes include:

- the addition or removal of a course from Embassy English's scope
- changes to course content

- changes to conditions of enrolment or enrolment procedures
- changes to campus locations

### **CRICOS Code**

Embassy Senior Management is responsible for ensuring that Embassy English's CRICOS code is included in all marketing material.

### **Marketing by third-party partners**

The Sales Manager is responsible for ensuring that all marketing material used by an authorised third-party partner which recruits students on behalf of Embassy English (i.e. an organisation with which Embassy English has an agreement for such recruitment) makes clear the fact that the third-party is recruiting on Embassy English's behalf.

### **Referring to other people or organisations**

Embassy English's Marketing Manager will ensure that all marketing material, including that which is used by authorised third-parties on Embassy English's behalf, makes reference to other people or other organisations only if those people or organisations have given their consent. The Marketing Manager is responsible for ensuring that a file is kept of written consent documents provided by such people and third-parties.

### **Formal acceptance of revised marketing material**

If there is a need to revise or update marketing material, the relevant Director must submit a request to update the document to the Embassy' Marketing Manager. Using this request, the relevant Director provides details of the reasons the material needs to be updated. The request is logged in the Weekly marketing Update, which is distributed to the Regional leaders. The Embassy' Marketing Manager approves or rejects the request to update the marketing material.

### **The relevant director must provide all draft updated material to the Embassy' Marketing Manager for checking.**

The Marketing Manager ensures that the revised Marketing Material is version controlled. A soft copy is placed on the Embassy English Integrated Marketing Huddle site.

### **Distribution of revised marketing material**

The relevant Director or manager is responsible for ensuring that all agents are advised by email of the availability of revised marketing material. The email identifies the marketing documents which have been revised.. The email indicates that the revised material is being sent to the agent and that it should be used immediately when it is received.

### **File storage of revised marketing material**

The Marketing manager is responsible for the archiving of all previous versions of revised marketing material. Revised marketing material is kept in the Integrated marketing Huddle and made available for agents on the Embassy Partner's site. All previous versions of marketing material are archived.

## Version numbering and dating

All Embassy English marketing material will have version numbers applied according to the Embassy English policy and procedures for document version control.

| Policy Version Details |  |
|------------------------|--|
| Approved by:           | Regional Director - Australia and New Zealand, Embassy English |
| Date:                  | 28 August 2018   |
| Date Commencing        | 31 August 2018   |

## Document History

| Commencing Date | Summary of Changes  | Next Review Date |
|-----------------|---|------------------|
| December 2017   | v4.0 Review, minor amendment and approval   | December 2022    |
| 06 April 2018   | v4.1 Review and amendment to maintain currency with business and regulatory changes | December 2022    |
| 31 August 2018  | V4.2 Administrative amendments  | December 2022    |