1. Ethical Marketing

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<th>Policy Version Details</th>
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<td>v24.0 February 2015</td>
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Statutory and regulatory compliance

- Standards for RTOs 2015
  - Clause 4.1 (a) (b) (c) (d) (e) (f) (g) (h) (i) (j) (k) (l)
- National Code 2007 Standards 1.1, 1.2, 1.3 and 2.1
- ESOS Act Section 15

Related Policies

- Learner Support and Welfare Services
- Staff Recruitment and Selection
- Staff Induction
- Fees and Charges
- Refunds
- Applications, Offers and Enrolments
- Student Orientation
- Education Agents
- Welfare of Younger Learners
- Information Provided to Applicants Prior to Enrolment
- Student Handbook
- Compliance with Statutory Requirements
- Transfer between Registered Providers
- Qualifications and Statements of Attainment
- Records Management

Related Documents

- Pre-enrolment information for intending Overseas Students
- Request to update marketing material
- CEO’s approval / rejection of request to update marketing material
- CEO’s approval for release of updated material

Policy

The IETS ethical marketing policy is designed to protect the reputation and integrity of IETS and of the international education industry in Australia. The policy has been developed to ensure that information which is contained in marketing material and which is presented at marketing activities is accurate, correct and current.
This policy applies in regard to all information disseminated directly by IETS and to information disseminated on behalf of IETS by third-parties with which IETS has entered into an agreement. References to IETS marketing material are references to material which provides information about IETS and its courses, whether that information is disseminated by IETS or a third-party with whom IETS has entered into an agreement.

All IETS marketing material and the IETS website will present information in an ethical and responsible manner, enabling potential learners to make informed decisions about studying with IETS in Australia. All marketing material for overseas students will include IETS’s CRICOS provider code. Using the information provided to them in marketing documents, intending learners will be able to make informed decisions about which courses to undertake. They will know whether the course they choose will provide them with a qualification or a specific skill set, and whether it will provide them with entry requirements to employment or other qualifications.

In regard to overseas students, IETS recruiters and marketers will refer all queries about migration outcomes to the CEO, who will ensure that correct and accurate information is provided. 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 CEO is responsible for checking that marketing material meets the ethical and quality standards of IETS.

**Procedures**

The CEO is responsible for ensuring that all marketing material (including the IETS website) is developed in an ethical and responsible way, consistent with the requirements of the IETS ethical marketing policy.

Responsibility for ethical development and review of marketing material

The CEO 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, employment and migration pathways must be accurate, up-to-date and conform to the requirements of relevant legislation and regulations, ASQA, DOE, DIBP and other government bodies and regulatory agencies.

All marketing material must be checked and approved by the CEO before it is released for publication.

All marketing material will clearly identify IETS’s RTO code, 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 IETS changes. Such changes include:

- the addition or removal of a qualification from IETS’s scope
- changes to course content
- changes to conditions of enrolment or enrolment procedures
- changes to agent arrangements
- changes to IETS senior staff
- changes to campus locations
- changes to third-party partnership arrangements
Marketing material will also be updated if IETS enters into a formal arrangement with another provider for the provision of pathway programs or if there are changes in educational or employment outcomes which apply to learners enrolling in a course at IETS.

NRT Logo

The Nationally Recognised Training (NRT) logo is a distinguishable mark of quality for promoting and certifying national vocational education and training leading to Australian Qualifications Framework (AQF) qualifications or Statements of Attainment.

Consistently with the “NRT Conditions of Use”, IETS will use the NRT logo only on such promotional material as is used to promote nationally recognised training which is within IETS’s scope. The NRT logo will not be used on products as corporate stationery, business cards, building signage, mouse pads, satchels, packaging around products nor learning resources supporting training.

The NRT logo will be depicted on all AQF certification documents issued by IETS. These can only be issued when the training delivered is covered by IETS’s scope of registration.

Please refer to the Qualifications and Statements of Attainment policy.

RTO Code

The RTO Manager is responsible for ensuring that IETS’s RTO code is included in all marketing material.

Marketing by third-party partners

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

Delivery by third-party partners

The RTO Manager is responsible for ensuring that all marketing material used by an authorised third-party partner which delivers training and assessment on behalf of IETS (i.e. an organisation with which IETS has an agreement for such delivery) makes clear the fact that the third-party is delivering training and assessment on IETS’s behalf.

Delivery for third-party partners

The RTO Manager is responsible for ensuring that all marketing material used by IETS makes clear which training products are being delivered by IETS on behalf of a third-party (i.e. an organisation with which IETS has an agreement for such delivery).

Distinguishing between AQF and non-AQF courses

The RTO Manager is responsible for ensuring that all marketing material used by IETS clearly distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from other training or assessment delivered by IETS.

Referring to other people or organisation

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

Licensing and regulatory outcomes

The RTO Manager is responsible for ensuring that IETS only advertises or markets that a training product it delivers will enable learners 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.
Government funding

The RTO Manager is responsible for ensuring that IETS includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with IETS’s provision of training and assessment, and does not guarantee that a learner will successfully complete a training product on its scope of registration, or that a training product can be completed in a manner inconsistent with IETS’s training and assessment strategies, or that a learner will obtain a particular employment outcome where this is outside IETS’s control.

Formal acceptance of revised marketing material

If there is a need to revise or update marketing material, the RTO Manager must submit a “Request to update marketing material” form to the CEO. Using the form, the RTO Manager provides details of the reasons the material needs to be updated. The CEO approves or rejects the request to update marketing material by use of the “Approval / rejection of request to update marketing material” form.

The RTO Manager must provide all draft updated material to the CEO for checking. The CEO provides formal acceptance of the updated material by use of the “CEO’s approval for release of updated marketing material”.

The RTO Manager ensures that the revised Marketing Material is version controlled according to the Document Version Control procedure. A hard copy of the revised material is placed in the Marketing Materials hard file and a soft copy is placed on the IETS shared network drive. The application for approval to update marketing material, the CEO’s approval to update marketing material and the CEO’s approval for release of updated marketing material should all be placed in the marketing material hard file.

Distribution of revised marketing material

The RTO 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 and the name and version number of the revised material. The email indicates that the revised material is being sent to the agent and that it should be used immediately it is received. Agents are instructed to dispose of all remaining stock of the previous material.

File storage of revised marketing material

The RTO Manager is responsible for the archiving of all previous versions of revised marketing material according to the Document Archive procedure. Revised marketing material is kept in the Marketing Materials hard file and in the current Marketing Materials folder on the IETS shared network drive. All previous versions of marketing material are archived according to the Document Archive procedure.

Restrictions on recruiting in conflict with National Code Standard 7

All marketing material will make it clear that Standard 7 of the National Code of the ESOS Act allows transfers between registered providers during the first six months of a student’s enrolment only under exceptional circumstances. All IETS staff will be made aware at induction and by use of this Policies and Procedures Manual of the restrictions on recruiting in conflict with Standard 7.

Version numbering and dating

All IETS marketing material will have version numbers applied according to the IETS policy and procedures for document version control. Please refer to the Records Management Policy.