

Marketing Policy

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Approved By: Ariadne Nicolaou

1. Purpose

This policy sets out the principles for marketing courses and services at Stanley College and provides a framework for ensuring that all marketing materials relating to Stanley College and its courses are ethical, accurate, transparent, and comply with best practice standards including the:

- Higher Education Standards Framework;
- Standards for Registered Training Organisations (RTOs) 2025;
- ESOS National Code of Practice for Education Providers;
- ELICOS Standards;
- VET Student Loans;
- FEE-HELP; and
- DTWD Jobs and Skills WA (Jobs & Skills, Traineeships & Apprenticeship, Pre-Apprenticeships to School, VDTSS, etc.)

2. Scope

This policy applies to:

- all staff involved in the marketing of Stanley College and its courses, as well as Education Agents and contractors working on behalf of Stanley College; and
- all employees and contractors and any other person who uses Social Media either in an authorised capacity, as part of their job, or in a personal capacity, where Social Media activity concerns Stanley College, its products and services, its people, clients, vendors, competitors and or other business-related individuals or organisations.

3. Key Definitions

CRICOS	The Commonwealth Register of Institutions and Courses for Overseas Students.
CRICOS Code	An individual code that is allocated to all courses available to international students to study, which is listed on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS).
Domestic Students	A student who is an Australian citizen, a New Zealand citizen, the holder of an Australian Permanent Resident visa or the holder of an Australian humanitarian visa. A domestic student can include temporary visa holders, who do not hold a Student Visa issued by DoHA, including 485, 457, student dependents, working holiday and visitor visa holders.
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. Education agent does not refer to an education institution with whom an Australian provider has an agreement for the provision of education (that is teaching activities).
Education Agent Agreement	A legal agreement between Stanley College and the Education Agent outlining the obligations and responsibilities of all parties.
International Student	A student studying in Australia on a student visa issued by DoHA.
National Code 2018	The National Code of Practice for Providers of Education and Training to Overseas Students 2018, established pursuant to Part 4 of the ESOS Act.
RTO Code	The registration identifier given to an RTO on the National Register, as per the Standards for RTOs 2025.
Standards for RTOs 2025	The Standards for Registered Training Organisations (RTOs) 2025, which sets out the requirements a RTO must meet when providing Vocational Education Training (VET) courses.
TEQSA Provider Number	Also known as the PRV number, is a unique identifier assigned by the Tertiary Education Quality and Standards Agency (TEQSA) to all higher education providers in Australia
Training Package	The components of a training package endorsed by the Industry and Skills Council, or its delegate. The endorsed components of a Training Package are: <ul style="list-style-type: none"> • units of competency; • assessment requirements (associated with each unit of competency); • qualifications; and • credit arrangements.

4. Policy Principles

Stanley College will ensure that all marketing activities undertaken in relation to its courses and education services are accurate, up-to-date and do not include false or misleading information.

Stanley College will ensure the information provided to students about its services, courses, units and Qualifications delivered is accurate and factual, regardless of whether the information is provided by the College, its brokers, online directories, Education Agents or other third parties.

Stanley College will ensure that its marketing, branding, and communication strategies are inclusive of all student groups. This includes initiatives aimed at increasing participation in VET courses by under-represented communities, such as First Nations peoples and individuals with disabilities. These initiatives may include but are not limited to:

- using inclusive language and imagery in promotional materials to reflect diversity; and
- highlighting success stories of graduates from under-represented groups to encourage participation.

Stanley College will:

- manage and monitor Education Agents who have agreements with Stanley College to ensure they comply with the Education Agents *Code of Ethics*, act with honesty and integrity, and within the terms of the Education Agent Agreement;

- not market courses or make any claims relating to course delivery until authorised to do so by the relevant regulatory body;
- ensure representations about the outcomes associated with undertaking and completing a course of study, including employment or migration outcomes, will not be false or misleading; and
- ensure that Stanley College's CRICOS Registration information is included as applicable in written or electronic materials produced or disseminated by the College.

4.1 Social Media

Stanley College has a *Social Media Policy* that includes guidance for anyone who refers to or is related to Stanley College or its subsidiary business operations including all stakeholders (students, staff, employers, government agencies, etc.) and states:

- materials published by, or about Stanley College and its stakeholders shall not be derogatory, menacing, harassing or offensive in any way;
- staff are required to apply a high level of professionalism when communicating, socialising or networking using any form of social media; and
- staff and students should be aware that Stanley College reserves the right to monitor usage of its electronic communications and take any action deemed necessary to prevent unacceptable materials.

4.2 Accreditation and Use of Logos

All information clearly distinguishes between Qualifications, nationally-recognised training and non-accredited courses.

All information clearly distinguishes CRICOS Registered courses offered to International Students.

Stanley College's marketing materials will enable students to make informed choices by ensuring the information is detailed, accurate and complies with the requirements of the Standards and legislative instruments listed in Section 1.

4.3 Course Marketing Materials

The Marketing Team will maintain a *Register* of approved marketing materials:

- Stanley College staff and its representatives must only use approved marketing materials; and
- whenever marketing materials is amended, the Marketing team will communicate the changes to staff and applicable representatives.

The Marketing Department will confirm the following before approving any new marketing material for courses:

- Stanley College's CRICOS code and registered name is included;
- the course has been accredited by the regulatory body;
- any associations with other organisations for the delivery of the course are referenced, where applicable and in line with their approved guidelines;
- any work-based training a student is required to undertake as part of the course, where applicable;
- any pre-requisites, including English Language Proficiency, academic background and/or work experience required for entry into the course be included;
- the material does not include:
 - a claim to secure a migration outcome;
 - a claim to secure an employment outcome; and

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- a guarantee of a successful education assessment outcome.

4.4 International Students

Prior to accepting an International Student into a course, Stanley College's marketing materials will include comprehensive and current information in plain English to enable individuals to make informed decisions about enrolling at the College. This information includes:

- requirements for an International Student's acceptance into a course, including minimum level of English language proficiency, educational Qualifications and/or work experience;
- information about course credit (as applicable);
- CRICOS Course Code, course content, modes of study including compulsory online and/or work-based training (placements, other community-based learning and collaborative research training arrangements) and assessment methods;
- course duration and holiday breaks;
- course Qualification, award or other outcomes;
- campus locations, facilities, equipment and learning resources available to students;
- indicative tuition and non-tuition fees, including advice on the potential for fee increases over the duration of a course, and Stanley College's cancellation and refund policies;
- grounds on which an International Student's enrolment may be deferred, suspended or cancelled;
- ESOS Framework, including links to official Australian Government materials; and
- accommodation options and indicative cost of living in Australia.

4.5 Guarantees and Inducements

Stanley College and its agents and representatives will not make any verbal or written guarantees that a student:

- will successfully complete a VET training product;
- can complete a training product in a manner which is inconsistent with the requirements set out in the Standards for Registered Training Organisations (RTOs) 2025;
- guarantee that a student will be issued with a Qualification or Statement of Attainment;
- draw false or misleading comparisons about other education providers and courses;
- offer inducements to prospective students that contravenes legislative requirements;
- will obtain a particular employment outcome, where obtaining such an employment outcome is not within Stanley Colleges control;
- guarantee any migration outcome as a result of training and/or assessment;
- provide or promote work placements that are in breach of the Fair Work Australia Act (2009);
- guarantee that studies at Stanley College will make a student eligible to enrol in another course;
- claim that a student will be eligible for any licence or accreditation as a result of training and/or assessment unless it is a licence outcome guaranteed by the issuer of the licence or accreditation;
- give any other false or misleading information or advice in relation to itself, its courses or outcomes associated with its courses; and
- knowingly recruit an International Student before they have completed six months of their principal course of study with another provider.

4.6 Testimonials and Permissions

Stanley College will obtain prior written permission from any person or organisation used as a source of comment, testimonial or picture, for any marketing and/or other material and will always abide by the conditions of that permission.

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4.7 Continuous Improvement

Stanley College collects feedback from students following each unit of competency and at the end of their course. This includes seeking feedback about whether they received the services that were advertised, this information is used to review and update Stanley College marketing materials and practices.

Further information about the continuous improvement process is detailed in the *Quality and Continuous Improvement Policy (VET & ELICOS)* and associated procedure.

5. Roles and Responsibilities

- **The Operations Manager:** is responsible for the ethical and accurate marketing of the College and its courses and ensuring compliance with the principles set in this policy
- **The Quality and Compliance Manager:** is responsible for ensuring marketing materials are compliance with the principles set out in this policy.
- **International Recruitment Manager:** Oversee the management of Education Agents at Stanley College and ensure compliance. Responsible for orchestrating all monitoring actions and associated actions/reporting.
- **Compliance Team:** Responsible for approval of all marketing materials and content, including monitoring processes and ensuring compliance.
- **Marketing Team:** Responsible for the development and maintenance of all marketing content.

6. Policy Information

Policy Area	VET / HE
Authorised Officer	The Operations Manager
Supporting documents, procedures, work guidelines and forms	Education Agent Agreement Education Agent Policy Education Agent Procedure Marketing and Advertising Material Approval Form (MAMA) Marketing Procedure Release of Information Form (RINF) Social Media Policy and Procedures Stanley College - ESOS Compliance Policy and Procedure Quality and Continuous Improvement Policy (VET & ELICOS) Quality and Continuous Improvement Procedure (VET & ELICOS) Student Surveys (End of Course / End of Unit of Competency)
Audience	Public

7. Compliance Monitoring Summary

Overview	Frequency
Annual review of all marketing collateral and website content by the compliance team, excel report generated and corrections managed. Final applicable updates closed, and reporting submitted to the Operations Manager and Vice President Business Development when actioned.	Annually in December

Annual Marketing Material Review – Education Agents. The international recruitment team will complete a compliance check of a representative ‘sample’ of its education agents. Summary report to be submitted from the International Recruitment Manager to the Vice President Business Development and the Compliance Team. Full details provided in the Education Agent Procedure.	April annually
Superseded and Removed Courses Monthly Audit to be completed and issued by the Compliance Administrator each month for corrective actions to be completed.	Monthly, last Friday

8. Link to Standards

8.1 Standards for RTOs 2025

Compliance Requirements / Credential Policy	Standards
Compliance Requirements	7. Marketing and Advertising: Standards 1 (a-d), 2 (a-d) and 3 (a-b) 8. Guarantees and inducements: Standards a-c

8.2 National Code of Practice 2018

Standard (Number)	Standard (Descriptor)	Standards (Individual)
Standard 1	Marketing information and practices	1.1, 1.2, 1.3, 1.4, 1.5
Standard 2	Recruitment of an overseas student	2.1, 2.2, 2.3, 2.4, 2.5
Standard 4	Education agents	4.1, 4.2