

<b>Name:</b>	MR1 - Marketing Policy	<b>Version:</b>	V7.1
<b>Policy owner:</b>	Head of Sales and Marketing		
<b>Approved by:</b>	Chief Executive Officer		
<b>Approved date:</b>	February 2020	<b>Review date:</b>	February 2021

## SECTION 1 - INTRODUCTION

### PURPOSE

This policy outlines the guidelines in which the RTO markets its accredited and non-accredited courses and services in line with the Standards for the RTOs 2015 (SRTOs) and all other relevant Federal and state funding contracts. This policy ensures that the RTO will not promote, market or distribute any publication regarding its services and operations with incorrect or misleading information and will conduct its marketing practices in an ethical manner.

### SCOPE

This policy applies to all employee, partners and associates of the Selmar Institute of Education (121531) in relation to publications distributed including flyers, newspaper, TV, radio, the website and social media, advertising its qualifications services and operations. This policy includes all regulatory requirements that fall under the RTOs obligations as a registered training organisation.

### DEFINITIONS

**Inducement** – is an incentive in the form of a benefit to the student. This may be in the form of a tangible gift, monetary enticement or guarantee.

**The Department** – refers to the Department of Education and Training Victoria, the Department of Education NSW, the Department of Education Queensland.

**Third Party** – an independent organisation who has a Memorandum of Understanding (MOU), contract or agreement with the RTO to deliver services related to recruitment of students and/or training and assessment of its training products.

**Scope of Registration** – means the training products listed on training.gov.au in which the RTO has been registered to deliver and/or assessment and issue an AQF certification.

**RTO** – means the Selmar Institute of Education (121531)

**TGA** – National Register of VET website. [www.training.gov.au](http://www.training.gov.au).

**Training and Assessment Strategy** – the approach and method designed and facilitated by the RTO to train and assess a training product as per the training package or accredited course.

## SECTION 2 - POLICY

- The RTO will accurately represent its service advertised in the form of printed material, web based, social media, multimedia, television, radio and verbal and will only market current nationally accredited qualifications as approved on its Scope of Registration.  
**Note:** Non-current qualifications, units of competency or skills sets will only be advertised whilst the qualifications, units of competency or skills sets remain on the RTOs scope of registration.
- All qualifications, units of competency or skills sets will be published as per the exact code and title on TGA.
- The RTO will promote and market the above qualifications with integrity, accuracy, honesty, and ethics and responsibly.
- the RTO will only market true and legitimate benefits to the student such as quality training and assessment, the total amount of tuition fees payable (regardless of funding options)
- The RTO will use the NRT logo as per the *Nationally Recognised Training (NRT) Logo Specifications* and *Schedule 4 of the SRTOs* when referring to nationally recognised qualification on its Scope of Registration.
- When using the VET Student Loans logo, the RTO will refer to the VET Student Loans Style Guide for Approved Course Providers V. September 2019
- The RTO will publish a summary of its most recent ASQA Re-registration Audit Report on its website.
- The RTO will advertise prominently on publications and web based marketing the RTO's registered business name (training name if applicable), the RTO code, full tuition fees and that Government funding is subject to eligibility criteria per applicant.
- The RTO will make clear on all advertisement and its website any training and assessment or student recruitment being delivered by another organisation on its behalf (or the RTO is delivering services on behalf of another organisation).
- The RTO will not falsely align or compare itself with any other organisation or training provider. In the instance the RTO has engaged in an approved Third Party arrangement or Brokering service, the details of the third party and their role in the training and assessment service will be clearly stated on the relevant publication and on the RTO's website.
- The RTO will not allow a third party to market any of the funded programs or the RTO's agreement to deliver the funded programs.
- The RTO will not advertise that any qualification or training product can be undertaken in any way other than what has been described in the qualification or training product Training and Assessment Strategy as designed by the RTO.
- Prior to enrolment, potential students are to be informed about the nature of training i.e. training modes and assessment methods, course duration, fees and charges, potential employment outcomes or further education pathways. This information is to be clearly explained on relevant publications, website and social media.
- The RTO will clearly state that all Government Subsidised training is subject to eligibility requirements being met.
- The RTO will not offer **inducements** to any student or potential student to encourage them to enrol into a course. For example, offering the potential student benefit of receiving an additional 'gift' from the RTO if they enrol into a course.

- The RTO will not advertise any guarantee that students will successfully complete any qualification or training product on its scope of registration
- The RTO will not advertise a guarantee that a student will obtain employment upon undertaking a course with the RTO.
- The RTO ensures that each person or organisation referenced in any marketing material has consent from the individual or organisation to use their image, testimonial or statement in its publications. This consent is confirmed via the *Marketing/Advertising/Publicity Consent Forms* as well as the *Student Application Form – Student Declaration*.

### VET Student Loans (VSL)

- Selmar Institute of Education is an approved provider to offer VET Student Loans (VSL).
- Selmar Institute of Education has business processes in place to ensure that all students that are funded under VSL are marketed to correctly and are not misled by the VSL provisions. Please refer to *MR1.1 Marketing Procedure*.
- Where the RTO breaches any clause or provision under the *VET Student Loans Act 2016* and *VET Student Loans Rules 2016* with regards to marketing it will incur the civil penalties applied including misrepresenting VLS, offering inducements, engaging in cold calling and failing to list third party contacts. Please refer to *Appendix A – Civil penalties and criminal offences of the VET Student Loans Manual for Providers*.
- The RTO will not **misinterpret** VSL to potential students to imply that the funding is not a loan and does not need to be repaid. The RTO will ensure that its marketing material (including website) clearly defines VSL as a ‘loan’ granted to eligible student by the Federal Government which is required to be repaid once the individuals taxable income is above the compulsory threshold.
- The RTO will not utilise a **third party** customer or contact list to market courses and promote VET Student Loan as a payment option.
- The RTO will not engage in advertising the option for VET Student Loans when **cold calling** to students or potential students. This means that the RTO will not promote this payment option to potential students who have not free willingly contacted us.
- When using the VET Student Loans logo, the RTO will refer to the VET Student Loans Style Guide for Approved Course Providers V. September 2019
- The RTO will publish, in a prominent place, on its website the following:
  - the RTO’s Application and Enrolment Policy and Procedure
  - the RTO’s Fees and Refunds Policy
  - Census Dates Schedule per course

### Victorian Skills First Program

- Selmar Institute of Education is an approved provider to offer funding via the Victorian Skills First Program to eligible students for selected courses on their scope of registration and on the Skills First Funded Courses Report. For the list of approved courses, please refer to the *RTO Funding Models Matrix*.
- Where the RTO delivers a funded course online will not advertise as being delivered entirely online. Nor will the RTO advertise a funded course as being delivered online if the qualification is on the *Online Delivery Restriction List*.

- The RTO will advertise funded courses using the following statement, “This training is delivered with Victorian and Commonwealth Government Funding”.
- The RTO will not use the logo or trademark of the State of Victoria or the Department of Education and Training Victoria without prior written consent by the Department.
- The RTO will publish, in a prominent place, on its website the following:
  - Fees and charges for subsidised training and will include the following statement, “The student tuition fees as published are subject to change given individual circumstances at enrolment”
  - the RTO’s Online Services Standards
  - the RTO’s Complaints and Appeals Procedure
  - Childsafe Standards
- The RTO will keep an up to date profile on the Victorian Skills Gateway.

### NSW Smart and Skilled Program

- Selmar Institute of Education is an approved provider to offer funding via the Smart and Skilled Program to eligible students for select courses on their scope of registration. For the list of approved courses, please refer to the *RTO Funding Models Matrix*.
- The RTO will include all of its approved courses funded under the Smart and Skilled program in its marketing material and promotion. However, the RTO will not continue to advertise a funded program where the cap is or will be exceeded.
- The RTO will not use the NSW state logo, trademarks or intellectual property of the NSW Government unless authorisation from the Department has been granted in writing.
- The RTO will inform all students and prospective students on the funding available under the Smart and Skilled program and the eligibility criteria.
- Selmar will use the following statement in all publications related to the Smart and Skilled funding program: “This training is subsidised by the NSW Government”.
- The RTO will not advertise that the training is ‘free of charge’, discounted or subsidised by the RTO or a third party.
- The RTO and its representatives will not encourage students to enrol with the RTO purely because of price matching or discounts. The RTO will promote its quality training and assessment services.
- The RTO’s website will include:
  - A direct link to the Smart and Skilled website
  - Details of the approved qualifications
  - Details of the Notification of Enrolment and Enrolment process and details of information the student is expected to provide such as declarations and ID
  - Details about obtaining the students USI
  - Fee information

### Queensland PQS Program

- Selmar Institute of Education is an approved provider to offer funding via the Qld VET Investment Program to eligible students for select courses on their scope of registration. For the list of approved courses, please refer to the *RTO Funding Models Matrix*.
- The RTO will publish on its website, in a prominent place the following:

- Total co-contribution fees to be charged to students
- Total concession and non-concession to be charged to students
- Withdrawal and Refund Policy
- Information regarding the VET Investment Programs funding criteria i.e. Certificate 3 Guarantee, Higher Level Skills and User Choice. This will include a reference link to the relevant program fact sheet on the Departments website.
- Details of any Third Party or subcontractor delivering training and assessment services in partnership with the RTO.
- The RTO will, when releasing any public statements, acknowledge the funding received by the Department for delivery of training and assessment using the words “*funded by the Queensland Government*”.
- The RTO will only refer to the funded programs using their correct full name: *Certificate 3 Guarantee* and *Higher Level Skills*.
- The RTO will not advertise fee free training unless referring to Free Training for Year 12 Graduates.
- The RTO will not use the Queensland Coat of Arms or any other state logo unless authorisation from the Department has been granted.

### Selmar Institute of Education Responsibilities

Head of Governance, Risk and Compliance is responsible for the approval of all marketing materials in accordance with this policy.

Prior to the commencement of any marketing campaign the Head of Governance, Risk and Compliance must review and approve all associated materials.

Head of Marketing is responsible for the development of all marketing materials in accordance with this policy and Standards for RTOs 2015, in preparation for approval.

### Records Management

All documentation from marketing processes are maintained in accordance with Records Management Policy. (See *SP2 Records Management Policy*)

### Monitoring and Continuous Improvement

This policy and subsequent practices are monitored by Selmar Institute of Education and areas of change are implemented through continuous improvement.

## SECTION 3 - LEGISLATIVE CONTEXT

Name	Section
Standards for the RTOs 2015	Part 3: Standard 4 & 5
VET Student Loans	Clause 4.10.1 – 4.10.9
Victorian Skills First Program	Sch 1 Part A: Clause 1.1 – 1.7
NSW Smart and Skilled Program	Smart and Skilled Operating Guidelines Clause 1.1-1.4, Clause 6
Queensland PQS Program	VET PQS Agreement Clause 11.3-11.6 PQS Policy 2017-18, Performance standard 1, Performance standard 2 (D), Performance standard 3 (B) PQS marketing and disclosure directives

## SECTION 4 - RELATED DOCUMENTS

Name	Document Type
MR1.1 Marketing Procedure	Procedure
MR1.1.1 Marketing Checklist	Form
MR1.1.2 Marketing Consent Form	Form
RTO Funding Models Matrix	Matrix
Learner Handbook	Handbook

## SECTION 5 - VERSION CONTROL

Version #	Approval Date	Approved by	Details
1	January 2011	Marcus Sellen	Creation of policy
2	September 2013	Marcus Sellen	Review of policy, update legislative information & authorisation details
3	August 2014	Marcus Sellen	Review of policy, update legislation information and include brand book information
4	February 2015	Marcus Sellen	Review of policy and update to new standards
5	January 2016	Marcus Sellen	Review of policy, update legislative information
6	November 2018	Marcus Sellen	Added state specific and VSL requirements, recoded under the new QMS, added Selmar Institute of Education Responsibilities, Record Management and Monitoring Continuous Improvement.
7	July 2019	Marcus Sellen	Update address
7.1	February 2020	Jo Asquith	Update Head of Governance, Risk and Compliance title