

Marketing Information Practices Policy and Procedure

1. Policy Statement and Purpose

This policy and procedure has been designed to ensure that information which is contained in marketing materials and which are presented at marketing activities is accurate, correct and current. The procedures associated with this policy apply to the development, approval and distribution of marketing materials.

2. Scope

The policy and procedure described herein applies to High School, Foundationⁱ, ELICOS or Higher Education course delivered and awarded by a SGA College listed in the footer of this document and staff of these colleges.

In this document, a reference to marketing material is a reference to any material which has been developed by SGA to advertise or market the services and course of SGA. It includes, but is not restricted to:

- pre-enrolment information such as brochures, flyers, banners and promotional material
- SGA websites
- material posted to social media sites such as Facebook and Twitter.

3. Policy Provisions

SGA marketing material **will**:

- uphold the integrity and reputation of SGA and Australia's education industry by ensuring the marketing of their courses and services is not false or misleading and is consistent with Australian Consumer Law;
- include SGA's Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered name and registration number (which is identified in the page 1 footer of this document) in all written and online material that is distributed or made publicly available;

This includes all material used to:

- provide, or offer to provide, a course to an overseas student;
 - invite overseas students to undertake or apply for a course; or
 - indicate the registered provider is able or willing to provide a course to overseas students;
- present information in an ethical and responsible manner, enabling potential students to make informed decisions about studying with SGA.

Using the information provided to them in marketing material, intending students will be able to make appropriate decisions about whether to enrol at SGA and about which courses to undertake. Intending students will know the qualification they will gain upon successful completion of the course. They will know whether the qualification they will gain upon successful completion of the course will provide them with requisite entry requirements to employment and/or other qualifications.

SGA marketing material **will not**:

- provide false or misleading information in relation to course requirements when seeking to enter into a written agreement with the intending student. (For further details refer to SGA's Admissions Policy and Procedure. For higher education courses refer also to SGA's Advanced Standing and Credit Transfer Policy and Procedure);

- commit to securing migration or education assessment outcomes for overseas students or guarantee successful education assessment outcomes for the overseas or intending overseas student; and
- recruit students if it conflicts with its obligations under Standard 7 (Overseas Student Transfers). (For further details refer to SGA's International Student Transfer Policy and Procedure).

3.1 Responsibilities

- a. Sales Director, Marketing Director
 - Overall responsibility for the development and distribution of ethical and responsible marketing material, according to the requirements of this policy.
- b. Marketing Managers/Regional Managers
 - Ensuring that all agents are advised of the availability of revised marketing material
 - Advising agents of the means of obtaining revised marketing material
 - Instructing agents in the use of revised marketing material.
- c. Admissions Director (or delegate)
 - The accuracy and correctness of marketing material content as relevant to the admissions function.
- d. Head of College (May also be referred to as Centre Director, Principal, or Campus Director)
 - The validity, accuracy, correctness and conformity of marketing material relevant to the programs and services for which they have responsibility
 - Ensuring the distribution and use of current and accurate marketing material at each campus.
- e. Academic Director (May also be referred to as Director Academic Programs, Dean, or Program(s) Manager, or College program lead)
 - Overall responsibility for the conformance of marketing material as relevant to the courses in their responsibility.
- f. Head of Compliance
 - Ensuring all marketing material complies with the requirements of all relevant legislation, standards, protocols and guidelines. This includes ensuring conformity of marketing material to the National Code, including that it clearly identifies the provider name and CRICOS number and that it does not contravene the requirements of the National Code.

3.2 Procedure

- 3.2.1 Marketing material is developed by Study Group Creative Services.
- 3.2.2 The persons(s) designated by the Marketing Director as responsible for development of marketing materials for each SGA brand/product will provide the Creative Services team with the working brief, which shall include:
 - content to be provided by Program Managers, admissions staff and the finance division
 - specific reference to requirements for compliance with the National Code and/or other relevant legislation, standards or guidelines.
- 3.2.3 The Creative Services team will provide sufficient draft versions for the consideration and feedback by the designated responsible party, the PEO, Campus Director/Program Manager, admissions and finance.
- 3.2.4 Information contained in marketing material about policies and procedures, course structure, course entry requirements, programs and services, and educational, possible employment and migration pathways must be accurate, up-to-date and conform to the requirements of the relevant legislation, standards and/or guidelines.

- 3.2.5 The content of final draft material will be signed off by the relevant content owner (e.g. Head of College, Academic Director, Admissions Director (or delegate)), the Marketing Director and, finally, the Marketing Director (or delegate).
- 3.2.6 The final draft will then will be provided to the Head of Compliance (or delegate) for signing off on compliance.
- 3.2.7 The Marketing Director will then be responsible for ensuring any other required approvals are obtained, if applicable, consistent with other stakeholder arrangements and SGA's delegations.
- 3.2.7 The materials will then be released for use according to a distribution list maintained by the Marketing Director.
- 3.2.8 SGA Creative Services is responsible for ensuring that:
- soft copies all marketing material which has become obsolete upon release of the revised material is properly archived
 - soft copies of revised material are uploaded as appropriate to the company portal (Connect)
 - all users of the revised material are advised of its availability.
- 3.2.9 The Marketing Manager/Regional Manager is responsible for ensuring that all web pages are appropriately updated with the revised material.
- 3.2.10 Version control of marketing material will be maintained according to the SGA Document Version Control policy.
- 3.2.11 Marketing Managers/Regional Managers are responsible for ensuring that all agents are advised of the availability of revised marketing material and how to access that material. The advice to agents identifies the marketing documents which have been revised. The advice indicates that the revised material is to be used immediately.

4. Policy Review

This policy is reviewed at a minimum of once every 5 years by the policy owner (or delegate) to ensure alignment to appropriate strategic direction and its continued relevance to current and planned operations. The next scheduled review of this document is listed in the document history section of this document.

5. Records Management

Records in association with this policy will be kept in accordance with SGA's Records Management Policy. Confidential documents related to the implementation of the policy will be maintained according to relevant privacy requirements.

6. Related Documents

SGA Student Privacy Policy, SGA Records Management Policy, SGA Agent Management Policy, SGA Admissions Policy and Procedure.

8. Related Regulations

This policy has been developed in line with requirements set out in the: Education Services for Overseas (ESOS) Act 2000 (and its amendments); National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018 (the National Code) which complements existing national quality assurance frameworks in education and training including the Higher Education Standards Framework (Threshold Standards, the English Language Intensive Courses for Overseas Students (ELICOS) Standards 2018, the Foundation Standards (operating adjunct to the National Code), the NSW Education Act and related regulations for NSW

Education Standards Authority (NESA) registered High Schools, the Australian Qualifications Framework (AQF), the Tuition Protection Service (TPS), and other Commonwealth and State legislation and regulatory frameworks and standards including the Privacy Act 1988, Corporations Act 2001; and Competition and Consumer Act 2010.

Document Approval

Document ID	SGA Marketing Information Practices Policy and Procedure		
Policy Owner(s)	Head of International Study Centres – ANZ and Head of Compliance		
Approved by	Chief Operating Officer- ANZ	Date Approved	7 September 2018
		Date Commencing	15 September 2018

Document History

Commencing Date	Summary of Changes	Next Review Date
02 January 2015	v4.1 Review and amendment	January 2016
15 September 2018	v5.0 Review and amendment to maintain regulatory and business currency	September 2023

ⁱ References to Foundation courses herein apply only to Foundation courses delivered and awarded by SGA's Taylors College (Perth campus) and Flinders International Student Centre (CRICOS Provider Code 01682E). They do not apply to the University of Sydney Foundation Program (CRICOS Course Code: 022310D) delivered by SGA's Taylors College (Sydney campus) on behalf of the University of Sydney (CRICOS Provider code 00026A).