

# Marketing Governance Procedure

<b>Policy code:</b>	CG2043
<b>Policy owner:</b>	Director, Marketing and Growth
<b>Approval authority:</b>	Chief Learner Experience Officer
<b>Approval date:</b>	23 February 2024
<b>Next review date:</b>	23 February 2027

## Table of Contents

Purpose .....	1
Scope .....	1
Legislative Context .....	2
Definitions .....	2
Actions .....	4
1. VET Programs .....	4
2. Higher Education Courses .....	8
3. International Marketing .....	10
Supporting Documents .....	10
Responsibility .....	11
Promulgation .....	11
Implementation .....	11
Records Management .....	11

## Purpose

The purpose of this document is to ensure that the appropriate measures and processes are in place so that all marketing and promotional activities undertaken by the University is done in accordance with internal and external compliance requirements.

The principal objectives of this Procedure are:

- Only transparent, accurate and relevant information is provided to all prospective and current students; and
- Prospective students are able to make informed decisions regarding studying at the University based on transparent, accurate and reliable information.

## Scope

This procedure applies to:

- All University staff who produce marketing materials for the purpose of providing information to prospective and current students regarding the University and its academic courses; and
- All forms of marketing material, regardless of the channel or method used, such as:
  - Advertising – newspaper, radio, television
  - Brochures or other hard copy publications

- Websites – including Federation University’s own website and any other sites where the University is referred to
- Social media – Facebook, Twitter, LinkedIn, TikTok, YouTube, Instagram
- Online Directories
- Online Advertisements
- Any marketing by third parties that relates to the University or to any training and assessment that is provided.

## Legislative Context

- Federation University Australia Act 2010
- The Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)
- The Higher Education Standards Framework (Threshold Standards) 2021
- National Vocational Education and Training Regulator Act 2011
- Standards for Registered Training Organisations (RTOs) 2014
- HESG VET Funding Contract (Dual Sector)
- Education and Training Reform Act 2006
- Education and Training Reform Regulations 2007 (Regulations 2007) Schedule 7
- VRQA Guidelines for VET Providers 2016
- Education Services for Overseas Students Act 2000
- Education Services for Overseas Regulations 2001
- The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018

## Definitions

Term	Definition
<b>AB – Academic Board</b>	<p>Academic Board:</p> <p>The principal academic body of the University whose purpose is twofold: firstly, to provide academic oversight of prescribed academic courses and unit of study of higher education and VET in the University; and secondly to provide advice to Council on the conduct and content of those courses and units.</p> <p>Specific responsibilities in the context of this <a href="#">Quality Framework</a> are</p> <ul style="list-style-type: none"> <li>• creating awareness of and providing leadership in relation to contemporary educational issues;</li> <li>• establishing a quality assurance framework for learning, teaching and research;</li> <li>• recommending and reporting to the Vice-Chancellor on matters relating to learning, teaching and research;</li> <li>• regularly reviewing and evaluating the performance of the Academic Board and reporting outcomes to Council.</li> </ul>

	Academic Board is supported in these duties by its Standing Committees. Please refer to <a href="#">Standing committees</a> for further detail on these committees.
<b>AQF</b>	Australian Qualifications Framework. A nationally consistent set of qualifications for all post-compulsory education and training in Australia.
<b>ASQA</b>	The Australian Skills Quality Authority. The national regulator for Australia's vocational education and training sector. ASQA regulates qualifications and training providers to ensure nationally approved quality standards are met.
<b>Course Finder</b>	<a href="http://study.federation.edu.au">http://study.federation.edu.au</a>  The Federation University Australia online course catalogue.
<b>ESOS</b>	Education Services for Overseas Students Act 2000
<b>HECC</b>	Higher Education Curriculum Committee
<b>HESG</b>	The Higher Education and Skills Group manages the Victorian Government funded training market, public provider governance and accountability, and the apprenticeship system.
<b>International Student</b>	A person holding an Australian student visa and is defined as an 'Overseas Student' in the ESOS Act.
<b>National Code 2018</b>	The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018.
<b>NVR Standards</b>	Standards for National VET Regulator Registered Training Organisations. The objectives of the NVR Standards are to ensure nationally consistent, high-quality training and assessment services within Australia's VET system.  Continual compliance with the Standards is a condition for all NVR registered training organisations and for applicants seeking registration under the Act.
<b>Regulator Standards</b>	The Higher Education Standards Framework (TEQSA) and the Australian Skills Quality Authority ASQA under the National Vocational Education and Training Regulator Act 2011.
<b>Scope</b>	The Scope of Registration details the nationally recognised training an RTO is approved to provide. FedUni's Scope can be viewed on the <a href="http://www.training.gov.au">www.training.gov.au</a> website. In this procedure the University's Scope of Registration will be referred to as "the Scope".
<b>Statute 5.1 The Schedule</b>	The Schedule, Statute 5.1, lists all current sealed awards which can be awarded by the University. The Schedule is maintained by the Manager, Registrar Services and includes all qualifications/courses included on the Scope.
<b>TEQSA</b>	The Tertiary Education Quality and Standards Agency is Australia's independent national quality assurance and regulatory agency for higher education.

<b>University Governance and Management Committees</b>	<p>Relevant committees that support the academic, operational and quality governance of the University's Vocational Education and Training programs and Higher Education courses.</p> <p>These include, but not limited to, the following committees or their replacements: Academic Board, Curriculum Committee, Learning and Teaching Committee and VET Curriculum and Quality Committee.</p>
<b>VCAL</b>	Victorian Certificate of Applied Learning
<b>VETCQC</b>	VET Curriculum and Quality Committee
<b>VTAC</b>	Victorian Tertiary Admissions Centre

## Actions

### 1. VET Programs

	ACTIVITY	RESPONSIBILITY	STEPS
A.	Programs must be on the University's Scope of Registration prior to any marketing activity being undertaken.	Education Manager	<ol style="list-style-type: none"> <li>1. Refer to: <a href="http://www.training.gov.au">www.training.gov.au</a>, the UniversityRTO number is 4909, to confirm whether a program is on the University's Scope of Registration.</li> <li>2. Refer to the <a href="#">VET Program Approval and Maintenance Procedure</a> for the processes required to extend and amend the University's Scope of Registration.</li> </ol>
B.	The addition or updating of content on Course Finder.	Education Manager	<ol style="list-style-type: none"> <li>1. As most of the information that populates Course Finder comes from the University's student management system, it is the responsibility of Program Managers to ensure that this information is current and accurate.</li> <li>2. Course Finder request forms must be completed for these pages to be added / updated. The request forms are located at: <a href="#">Course Finder Updates</a></li> <li>3. The Marketing Summary form must be completed to ensure that PMC and Marketing have up-to-date details for the University's student management system and any</li> </ol>

			advertising that Marketing may undertake.
C.	Marketing materials must acknowledge government support of training services and any implications of the provision of funding	Marketing Director or delegate	<ol style="list-style-type: none"> <li>1. All promotional publications, reports, signage or other prepared materials (including radio and television) must include an acknowledgement in a prominent way that the Training Services are provided to Eligible Individuals with Funds made available by the Victorian and Commonwealth Governments (for example, a statement that 'this training is delivered with Victorian and Commonwealth Government funding').</li> <li>2. If students are accessing any government funding entitlement that may reduce their ability to access such funding in the future, they must be informed of this prior to enrolment. A statement should be included in marketing materials to this effect, eg <i>Applicants / students should be aware that enrolling in this qualification may affect any government training entitlements and funding arrangements in relation to the enrolling in any future study. For further information please refer to : <a href="#">Eligibility criteria.</a></i></li> </ol>
D.	Marketing activities must include particular details to meet all external regulatory requirements	Marketing Director or delegate	<ol style="list-style-type: none"> <li>1. To ensure compliance with all relevant VET regulatory bodies, including ASQA, HESG and the VRQA, all program marketing activities must meet the following requirements: <ul style="list-style-type: none"> <li>• All promotional publication, report, signage or other prepared materials (including website, social media pages, radio and television) must include the University's Legal Name (Federation University Australia) and CRICOS</li> </ul> </li> </ol>

			<p>Provider No. 00103D   RTO Code 4909   TEQSA PRV12151 (Australian University).</p> <ul style="list-style-type: none"> <li>• All marketing materials must include the National Code and Title of any AQF Qualification, Skill Set or VET course (as published on the National Register / Scope of Registration).</li> <li>• There is an estimated duration of the services listed, training hours and commitment required.</li> <li>• The nature and requirements of the proposed training is accurately identified.</li> <li>• Financial arrangements in respect of the training, including the cost to and any other financial impacts on prospective learners is provided.</li> <li>• Any third party training and assessment arrangements must be accurately identified.</li> <li>• Expected locations at which the services will be delivered is listed (eg. Gillies Street Campus, SMB Campus).</li> <li>• Expected modes of delivery are listed (eg. Online, Flexible, classroom).</li> <li>• Any required workplacement arrangements to gain the program are listed.</li> <li>• Program pathway information is clear.</li> <li>• Materials and resources required, particularly those that must be supplied by the student.</li> <li>• Entry requirements applicable for programs must be clearly identified such as, a current working with children check.</li> <li>• Possible employment and licencing outcomes from the training program is identified.</li> </ul>
--	--	--	---

E.	Marketing activities must meet all principles as detailed by the external regulatory requirements	Director Marketing or delegate	<p>The University is responsible for ensuring that:</p> <ol style="list-style-type: none"> <li>1. prospective students are provided with transparent and accurate information;</li> <li>2. that the promoting / marketing of a program is always done in an honest, ethical and responsible manner and programs are marketed / promoted with integrity and accuracy;</li> <li>3. that when promoting / marketing a program staff must not take advantage of a prospective student's vulnerabilities to recruit them into a program; this includes age, disabilities or illiteracy;</li> <li>4. staff must not engage in false or misleading advertising, promotion or recruitment practices; and</li> <li>5. staff must not pay, provide or offer, either directly or indirectly, incentives to undertake government subsidised training, whether to an Eligible Individual or to an entity (such as an employer or social organisation).</li> </ol>
F.	Prospective students must be provided with details relating to government financial support arrangements	Program Manager / Director Marketing or delegate	<p>Prospective and current students must be provided with details regarding VET Student Loans. This is an Australian Government loan program that helps eligible students enrol in an approved course pay for all or part of their VET tuition fees.</p> <p>For further details of this scheme refer to: <a href="#">VET Student Loans</a></p>
G.	Review of marketing / promotional materials	Education Manager / Director Marketing or delegate	<p>Course Finder and any existing brochures / promotional materials must be reviewed and updated annually to ensure the currency and compliance of documentation and electronic information.</p>

## 2. Higher Education Courses

	ACTIVITY	RESPONSIBILITY	STEPS
A.	Courses must be on the University's Schedule 5.1 prior to any marketing activity being undertaken.	Coordinators Programs, Program Support & Technical Services	<ol style="list-style-type: none"> <li>1. Refer to: <a href="#">The Schedule 5.1 - Current Programs Higher Education</a> , to confirm whether a program is on the University's Schedule 5.1.</li> <li>2. Refer to the Approval and Maintenance of Award Programs Higher Education Procedure for the processes required to extend and amend the University's Schedule 5.1.</li> </ol>
B.	The addition or updating of content on Course Finder.	Coordinators Programs, Program Support & Technical Services	<ol style="list-style-type: none"> <li>1. As most of the information that populates Course Finder comes from the University's student management system, it is the responsibility of Coordinators Programs, Program Support &amp; Technical Services to ensure that this information is current and accurate.</li> <li>2. Course Finder request forms must be completed for these pages to be added / updated.</li> </ol> <p>The request forms are located at: <a href="#">Course Finder updates</a>.</p>
C.	<p>Marketing activities must include particular details to meet all external regulatory requirements.</p> <p>Marketing activities includes any activities that provide prospective students with digital or hardcopy, takeaway or printable information.</p>	Marketing Director or delegate	<ol style="list-style-type: none"> <li>1. To ensure compliance with all relevant higher education regulatory requirements, as provided by TEQSA, all program marketing activities must meet the following requirements: <ul style="list-style-type: none"> <li>• The nature and requirements of the proposed course is accurately identified, this includes course design and prerequisites.</li> <li>• Expected locations at which the course will be offered is listed (eg. Mt Helen Campus, Churchill Campus).</li> <li>• There is an estimated duration of the course listed and commitment required.</li> </ul> </li> </ol>



			<ul style="list-style-type: none"> <li>• Application details for the program.</li> <li>• Arrangements for recognition of prior learning and standing credit transfer.</li> <li>• Course and employment pathway information is provided, along with eligibility for registration to practice where applicable.</li> <li>• Expected modes of delivery are listed (eg. Online, Flexible, classroom).</li> <li>• Financial arrangements in respect of the course, including the cost to and any other financial impacts on prospective learners is provided.</li> <li>• Any third party arrangements must be accurately identified.</li> <li>• Any required workplacement arrangements to gain the course are listed</li> <li>• Materials and resources required, particularly those that must be supplied by the student. This should also include technical requirements for access to IT systems.</li> </ul> <p>Where a course leads to professional registration or licensing, details of any additional requirements must be provided.</p> <p>Course accreditation information must be available, demonstrating that the course is currently accredited with the registering body.</p> <p>The above information can be provided through links to appropriate sections of the University's website, however this information must be easily accessible and current.</p>
D.	Marketing activities must meet all principles as detailed by the external regulatory requirements	Marketing Director or delegate	The University is responsible for ensuring that:

			<ol style="list-style-type: none"> <li>1. prospective students are provided with transparent and accurate information;</li> <li>2. that the promoting / marketing of a course is always done in an honest, ethical and responsible manner and courses are marketed / promoted with integrity and accuracy; and</li> <li>3. staff must not engage in false or misleading advertising, promotion or recruitment practices.</li> </ol>
E.	Prospective students must be provided with details relating to government financial support arrangements	Coordinator, Programs / Marketing Director or delegate	<p>Prospective and current students must be provided with details regarding the Higher Education Loan Program HELP. The Commonwealth Government administers this scheme which consists of four HELP loan schemes to assist eligible students with the cost of their fees.</p> <p>For further details of this scheme refer to: <a href="#">Help loans and VET Student Loans</a></p>
F.	Review of marketing / promotional materials	Coordinator, Programs / Marketing Director or delegate	Course Finder and any existing brochures / promotional materials must be reviewed and updated annually to ensure the currency and compliance of documentation and electronic information.

## 3. International Marketing

To ensure all marketing materials targeted at international students are produced in accordance with the National Code 2018 (Standard 1) and the ESOS Act (2000) the University has the following procedures in place:

- [International Marketing Material Approval Process Procedure](#)
- [Marketing Information and Practices Procedure](#)

## Supporting Documents

- [Quality Framework](#)
- [Quality Regulatory Compliance Guidelines](#)
- [VET Program Approval and Maintenance Procedure](#)
- Statute 5.1 – Schedule 5.1

## Responsibility

Role	Responsibilities
Chief Learner Experience Officer	Overall responsibility for the quality and compliance of all VET and academic marketing and promotional materials used across the University.
Director, Marketing and Growth or delegate	<p>Work with Coordinators Programs, Program Support &amp; Technical Services / Education Managers in the development of effective and compliant marketing materials.</p> <p>Contribute to the development of Course Finder pages and updates to ensure full compliance with University policy and external regulatory requirements.</p> <p>Process requests for use of approved social media platforms for marketing purposes.</p>
Coordinator, Programs, Program Support & Technical Services/ Education Managers	<p>Ensure only approved marketing products are used within Institutes.</p> <p>Ensure that course information in Course Finder is current and accurate.</p> <p>Work collaboratively with marketing team in the development and publication of marketing material.</p> <p>Complete compliance check prior to submission of marketing product to Marketing Manager for approval.</p> <p>Monitor relevant webpages to ensure they remain compliant and accurate.</p>

## Promulgation

The [Marketing Governance Procedure](#) will be communicated throughout the University community in the form of:

1. an Announcement Notice via FedNews website and on the 'Recently Approved Documents' page on the 'Policies, Procedures and Forms @ the University' website to alert the University-wide community of the approved Procedure;
2. distribution of e-mails to Executive Dean / Head of Department / University staff.

## Implementation

The [Marketing Governance Procedure](#) will be implemented throughout the University via:

1. an Announcement Notice via FedNews website and on the 'Recently Approved Documents' page on the 'Policies, Procedures and Forms @ the University' website to alert the University-wide community of the approved Procedure;
2. Staff induction sessions
3. Training sessions

## Records Management

Document Title	Location	Responsible Officer	Minimum Retention Period
University Publications - hardcopy	Forward to Record Management Services for archiving	Director Marketing	Seven Years
University Publications - electronic	The University's approved policy management system	Director Marketing	<b>Seven Years</b>