



## MARKETING POLICY AND PROCEDURE

<b>Marketing Policy and Procedure</b>		
Code: B3.06	Area: Non-Academic B	
Policy Owner: BoD	Version #: 1.4	Date: 2 Feb 2024
Policy Developer/Reviewer: CEO	Review date: 2 Feb 2027	

### VERSION HISTORY

Version	Updated by	Approval Date	Details
1.0	BoD	28 Jan 2020	New policy.
1.1	PRG	2 Oct 2020	Updated to include the Prospective Student Register and specify how it is used.
1.2	PRG	1 Oct 2021	Updated to include SITCM's Instagram, LinkedIn and YouTube accounts.
1.3	BoD	9 Dec 2022	Regular review; lead conversion procedure added.
1.4	BoD	2 Feb 2024	Specified that SITCM cannot guarantee successful education outcomes or migration outcomes for students.

### PURPOSE AND SCOPE

The purpose of this policy is to:

- Ensure that marketing practices are conducted in a transparent, ethical and effective manner.

This policy applies to both the Sydney Institute of Traditional Chinese Medicine (SITCM) and any third parties who SITCM engages to act on its behalf.

## 1 OVERVIEW

The Sydney Institute of Traditional Chinese Medicine (SITCM) is committed to ensuring that it is represented, both by itself and any third parties, in a manner that is accurate, ethical and not misleading or deceptive. SITCM requires staff members who are involved in public relations and advertising to do so in a legal, ethical and responsible manner. Staff should be aware that marketing and advertising about SITCM's courses is also subject to the Australian Consumer Law and/or state fair trading laws.

This policy has been informed by the *Higher Education Standards Framework (Threshold Standards) 2021*, in particular Section 7.1 Representation, the *Standards for Registered Training Organisations (RTOs) 2015*, the *Higher Education Support Act 2003* and the *Education Services for Overseas Students Act 2000* (ESOS Act), including the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code).

## 2 POLICY

### 2.1 RESPONSIBILITY

- 1) The CEO has ultimate responsibility for marketing activities at SITCM.

### 2.2 MARKETING STRATEGY

- 1) SITCM's marketing strategy is guided by its *Strategic Plan* and outlined by its *Marketing Plan*, both of which are implemented after receiving approval from the Board of Directors.
  - a. Both plans are updated annually and span three (3) years.

### 2.3 MARKETING MATERIAL

- 1) All marketing material, including the SITCM website and social media accounts, must:
  - a. Clearly identify the CRICOS-registered name and provider number of SITCM;
  - b. Clearly identify the courses being promoted;
  - c. Provide information in a manner that is accurate, ethical, unambiguous and not misleading;
  - d. Comply with the ESOS Act, in particular Sections 8, 9 and 107; and
  - e. Comply with the National Code, which requires SITCM to never guarantee successful assessment outcomes in its courses or to claim that an SITCM course can secure a migration outcome for a student.
- 2) Marketing material related to Higher Education courses must also comply with the *Higher Education Support Act 2003*, including but not limited to the following requirements:
  - a. That SITCM may not offer or cause any benefits that would be reasonably likely to induce a person to make a request for Commonwealth assistance.
- 3) Marketing material related to Vocational Education and Training (VET) courses must also:
  - a. Include SITCM's RTO Code; and
  - b. Comply with other requirements of the *Standards for Registered Training Organisations (RTOs) 2015*, in particular under Clause 4.1.
- 4) Marketing material that mentions VET Student Loans must also prominently mention:<sup>1</sup>
  - a. That VET Student Loans are only approved for students who meet all eligibility requirements, and
  - b. That a VET Student Loan creates a HELP debt that continues to be a debt to the Commonwealth until it is repaid.

#### 2.3.1 SITCM WEBSITE

- 1) Before the start of every semester, the SITCM website is reviewed to ensure all information is accurate and up to date.
- 2) The IT Officer implements all changes to the website that are identified as necessary during a review.
- 3) The responsibility for conducting a website review, and notifying the IT Officer of any necessary changes, is held as follows:
  - a. The Dean: for all website information related to Higher Education courses.
  - b. The Associate Dean: for all website information related to VET courses.
  - c. The Quality Assurance Manager: for all other website information.

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<sup>1</sup> VET Student Loans Manual for Providers.

**2.3.2 SOCIAL MEDIA**

- 1) SITCM maintains accounts on Facebook, Instagram, LinkedIn, WeChat, Google Business and YouTube to engage with the public.
- 2) The CEO and Dean may post content on behalf of SITCM.
  - a. No other personnel may represent themselves as speaking on behalf of SITCM in any medium of public communication without the authorisation of the CEO or the Dean.
- 3) Marketing on social media cannot mention the possible availability of a VET Student Loan.<sup>2</sup>

**2.3.3 MARKETING LEADS**

- 1) A *EOI Register* is maintained by the Administration Office.
- 2) Every time a prospective student expresses interest in an SITCM course without enrolling, that person is added to the register if their consent to receiving marketing communications from SITCM is provided, either expressly or through reasonable implication.
  - a. If a prospective student's contact details are received from a third party, SITCM will never mention the availability of VET Student Loans when contacting the prospective student.
- 3) If a student indicates to any Administration Office representative that they do not wish to be contacted by SITCM for marketing purposes, the *EOI Register* will be updated to reflect this.

**2.3.4 MEDIA ENGAGEMENT**

- 1) SITCM encourages individual academic staff to interact with the media to showcase their practice and research and to provide expert commentary on topics related to their areas of expertise.
  - a. When an academic staff member's comments or viewpoints may be considered controversial or offensive, SITCM requests that the academic staff member first consult with the CEO or the Dean before speaking with the media.
  - b. Academic staff who are in contact with the media based on their areas of expertise are requested to inform the CEO or Dean to ensure that SITCM is appropriately referenced or acknowledged in their communications with the media.
- 2) Staff and students who become aware of issues that could generate adverse media outcomes for SITCM are requested to liaise with the CEO or Dean to determine appropriate responses.
- 3) This section is not intended to infringe on a staff member's right to freely express their opinion in a private capacity or as a member of any professional, community or representative body.

**2.4 PRIVACY**

- 1) At no time may any action be taken in the implementation of this policy that contravenes the *Privacy Policy*.

**2.5 EDUCATION AGENTS**

- 1) SITCM may engage education agents to act on its behalf for the recruitment of international students only.

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<sup>2</sup> VET Student Loans Manual for Providers.

- 2) Education agent agreements must specify that the education agent has a responsibility to accurately represent SITCM's services.
- 3) Agreements with education agents will only be entered into after SITCM has conducted due diligence.
- 4) While an agreement with an education agent is in force, SITCM will conduct regular monitoring activities.
- 5) For further details, refer to the *Third Party Management Policy and Procedure*.

### **3 PROCEDURE**

#### **3.1 LEAD CONVERSION PROCEDURE**

- 1) A prospective student expresses interest in studying at SITCM and provides their consent to receive marketing communications (either expressly or by reasonable implication).
- 2) The Administration Office adds the prospective student to the *EOI Register*.
- 3) On the same day that the prospective student is added to the register, the Administration Office emails them the following material for any courses that they expressed interest in:
  - a. The relevant student prospectus;
  - b. The relevant academic calendar;
  - c. The relevant semester's academic timetable;
  - d. The relevant application form; and
  - e. Details of the next relevant Open Day.
- 4) If no response is received from the prospective student, the Administration Office contacts them two weeks after the material was sent to follow up.
- 5) The Administration Office continues to contact the prospective student once a month until one of the following occurs:
  - a. The prospective student submits a complete application; or
  - b. The prospective student asks to not be contacted for marketing purposes.

### **4 RELATED POLICY AND OTHER DOCUMENTATION**

- 1) Higher Education Standards Framework (Threshold Standards) 2021.
- 2) Standards for Registered Training Organisations (RTOs) 2015.
- 3) Higher Education Support Act 2003.
- 4) ESOS Act 2000.
- 5) National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- 6) Strategic Plan.
- 7) Marketing Plan.
- 8) VET Student Loans Act 2016.
- 9) VET Student Loans Manual for Providers.
- 10) EOI Register.
- 11) Privacy Policy.
- 12) Third Party Management Policy and Procedure.