

Name:	MR1 Marketing Policy	Version:	V7.3
Policy owner:	Head of Growth and Partnerships		
Approved by:	Quality and Compliance Manager		
Approved date:	January 2011	Review date:	November 2024

## 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 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 employees, partners and associates of the RTO in relation to publications distributed including flyers, newspapers, TV, radio, the website and social media, advertising its qualifications services and operations. This policy includes all regulatory, contractual and legislative requirements that fall under the RTOs obligations.

### DEFINITIONS

**Inducement** – 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 and the Department of Education New South Wales.

**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.

**SRTOs** – stands for Standards for Registered Training Organisations (RTOs) 2015

**RTO** – stands for Registered Training Organisation, and in this case 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.

**VSL** – stands for VET Student Loans.

## SECTION 2 - POLICY

- The RTO will accurately represent its services advertised in the form of printed material, web based, social media, multimedia, television, radio and verbal and will only market nationally accredited qualifications that are current and 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 approved qualifications responsibly with integrity, accuracy, honesty, and ethics.
- the RTO will only market true and legitimate benefits to the student such as quality training and assessment (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. January 2021
- 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 (trading 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 advertisements and its website any training and assessment or student recruitment being delivered by another organisation on its behalf (or if 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 RTOs 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 Consent Form* as well as the *Student Application Form – Student Declaration*.

### VET STUDENT LOANS (VSL)

- The RTO is an approved provider to offer VSL.
- The RTO 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 such as misrepresenting VSL, offering inducements, engaging in cold calling and failing to list third-party contacts, it will incur the civil penalties applied. 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 by implying 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 individual's taxable income is above the compulsory threshold.
- The RTO will not utilise a third-party customer or contact list to market courses and promote VSL as a payment option.
- The RTO will not engage in advertising the option for VSL 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 VSL Style Guide for Approved Course Providers V. January 2021
- The RTO will publish, in a prominent place, on its website information, the following:
  - the RTO's Application and Enrolment Policy and Procedure
  - the RTO's Fees and Refunds Policy
  - Census Dates Schedule per course
- The RTO will ensure any marketing which mentions the possible availability of a VSL for students undertaking a course prominently mentions, in a font size that is approximately the same as any other marketing information that accompanies it, the following:
  - RTO name and any registered business name or other business name
  - RTO registration code
  - that VSL will not be approved for students who do not meet eligibility requirements and
  - that a VSL gives rise to a VETSL debt which continues to be a debt due to the Commonwealth until it is repaid

**VICTORIAN SKILLS FIRST PROGRAM**

- The RTO is an approved provider of the Skills First Program to offer government subsidised funding 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 *Course Offering and Funding Information*.
- Where the RTO delivers a funded course online, it will not advertise as being delivered entirely online.
- 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.

**NEW SOUTH WALES SMART AND SKILLED FUNDING PROGRAM**

- The RTO is an approved provider of the Smart and Skilled Program to offer NSW government subsidised funding to eligible students in select courses on its scope of registration. For the list of approved courses, please refer to the *Course Offering and Funding Information*.
- 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.
- The RTO 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.

**RTO RESPONSIBILITIES**

Head of Growth and Partnerships will ensure that the Marketing and Communications Manager (MCM) develops marketing materials in accordance with this policy and SRTOs, in preparation for approval.

Prior to the commencement of any marketing campaign Quality and Compliance Manager must review and approve all associated materials in accordance with this policy.

**RECORDS MANAGEMENT**

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

**MONITORING AND CONTINUOUS IMPROVEMENT**

This policy and subsequent practices are monitored by the RTO and areas of change are implemented through continuous improvement.

**SECTION 3 - LEGISLATIVE CONTEXT**

Name	Section
Standards for the RTOs 2015	Standard 4 & 5
VET Student Loans	Clause 4.10.1 – 4.10.9
Victorian Skills First Program	Sch 1 Part A: Clause 1.1 – 1.4
NSW Smart and Skilled Program	Smart and Skilled Operating Guidelines Clause 1.1-1.4

**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
Course Offering and Funding Information	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	March 2021	Julie van Belkom	Updated to reflect current practice
7.2	August 2022	Jo Asquith	Removed QLD information, updated file name of Course Matrix Updated VSL section to add information for 'marketing that mentions VSL' Removed reference to Online Delivery Restriction List Updated policy owner
7.3	November 2023	Aruna Joshi	Updated policy approver Include Marketing and Communication Manager in RTO responsibilities section