



**Policy Number & Name:** RTOPRO032 International Marketing Policy

**Policy Area:** Crown College International– International Students Only

**Authorised by:** Internationalisation Advisory Committee

**CRICOS provider No** **03582D**

**Organisation Definition:**

Crown Melbourne Limited trades as Crown Melbourne Limited, Crown College and Crown College International. For the purpose of this policy, any reference to Crown College, or the “college” should be considered a reference to any of these respective trading names.

**1. Policy**

1.1 Crown College International is committed to delivering quality education for international students whilst maintaining the nationally consistent standards as set out in The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students (the National Code 2018) registered under the Education for Overseas Students Act 2000 (the ESOS Act) and is compliant with all relevant national, state and territory legislation.

**2. Scope**

This policy applies to all Crown College International employees and its consultants, representatives or agents in accordance with the National Code 2018 for marketing, promoting and advertising its services.

**3. Responsibility**

The Sales and Marketing Officers in consultation with the Group General Manager is responsible for the development of all international marketing and promotional materials used at Crown College International.

## 4. Procedures

### 4.1 Marketing Material

4.1.1 Prior to the commencement of any marketing campaign, the Sales and Marketing Officers and Group General Manager must review and approve any associated materials.

4.1.2 Marketing and promotional material may include, but not be limited to:

Printed advertising	Websites
Broadcast advertising	Email, SMS and MMS
Banner and display advertising	Multi-media presentations
Leaflets and brochures	Videos
Newsletters	Podcasts
Posters	Information in electronic format
Corporate display advertising material	Forms
Handbooks	Training materials

4.1.3 To achieve the required standard:

- i. Crown College International will accurately and honestly represent its services to prospective international students or their representatives or agents;
- ii. Clearly identify Crown College International's name, RTO number and CRICOS number in all published marketing and other material for international students, including any materials that are delivered in an electronic format.
- iii. Not give false or misleading information or advice in relation to:
  - o Claims of association between providers;
  - o The potential employment outcomes associated with a course;
  - o Conditions for automatic acceptance into another course;
  - o Possible migration outcomes;
  - o Any other claims relating to Crown College International, its courses, or outcomes associated with Crown College International's courses.
- iv. Crown College International will ensure at all times that full details of special conditions applying to its services will be clearly communicated to its international students, or applicants, or their representatives or agents;
- v. Any advertisements referring to its status or course contents will be defined clearly and without ambiguity;
- vi. Crown College International will identify nationally recognised training products as being distinct from other products or services and advertise or market them accordingly;
- vii. Only nationally recognised training products within Crown College International's Scope of Registration for international students will be promoted and marketed by Crown College International;

viii. Crown College International will not use information concerning any student, unless written permission from the student has been obtained.

4.1.4 Crown College International marketing, or promotional material or general advertising will not:

- i. Encourage unrealistic expectations or falsely represent the level of qualifications attainable, or the facilities and equipment offered by Crown College International;
- ii. Make claims regarding levels of approval or recognition that are inaccurate, nor use misleading or false comparisons with other courses provided by competitors;
- iii. Make misleading or false statements concerning the qualifications or experience of Crown College International employees or contractors;
- iv. Make misleading or false statements about the prospects of employment as a result of undertaking the Crown College International course following the course's conclusion;
- v. Crown College International will also not actively seek to recruit a student where this conflicts with its obligations under Crown College International's procedures for transfers between Registered Providers.

4.1.5 All course objectives, costs and expectations are clearly communicated to prospective students prior to commencement. Misleading or false information will not be included in any marketing material, nor will comparisons be drawn between Crown College International and other organisations.

4.1.6 Accordingly, all marketing and promotional materials for international students (either printed or electronic) must clearly identify Crown College International's registered provider's name and each course CRICOS number.

## **4.2 Course Information**

4.2.1 All applicants and participants will be provided with the following information prior to enrolment in any Crown College International course:

- Admission procedure and criteria;
- Required competencies for acceptance into course;
- Credit Transfer and RPL policy and requirements;
- Course costs;
- Crown College International Refund policy;
- Complaints & Appeals policy.

### 4.3 Recruitment

4.3.1 Crown College International aims to recruit international students through:

- i. International Education Agents;
- ii. Website advertising;
- iii. Selected social media;
- iv. Print media;
- v. Exhibitions, events and trade shows;
- vi. Word of mouth resulting from a favourable experience and outcome at Crown College International of a former Crown College International student.

4.3.2 As per the National Code 2018, Crown College International will not knowingly promote to, recruit or enrol any student who wishes to transfer from another registered provider's course prior to that student having completed six months of their principal course of study, except in cases where:

- i. The original registered provider has ceased to be registered, or the course in which the international student is enrolled has ceased to be registered;
- ii. The original registered provider has supplied a written letter of release;
- iii. The original registered provider has had a sanction imposed on its registration by the Australian Government, or a State or Territory Government, that prevents the international student from continuing their original course;
- iv. Any Government sponsor of the international student considers the change to be in the international student's best interest and has supplied written support for that change.

4.3.3 Prior to accepting an international student, or an intending international student, for enrolment in a course, Crown College International must provide in print or through referral to an electronic medium such as a website, current and accurate information regarding the following:

- i. The requirements for acceptance for an international student into a Crown College International course, including the minimum level of English language proficiency, educational qualifications or work experience required and whether a course credit may be applicable;
- ii. The course content and duration, qualification offered if applicable, modes of study and assessment methods;
- iii. Crown College International campus location and a general description of facilities, equipment and learning and library resources available to the international student;
- iv. Details of any arrangements made with another registered provider, person or business to provide the course or part of the course (if applicable);

- v. Indicative course-related fees, including advice on the potential for fees to change during the international student's course and applicable refund fees;
- vi. Specific information and details of the Crown College International Refund Policy and specific information about the grounds on which the international student's enrolment may be deferred, suspended or cancelled;
- vii. A description of the ESOS framework made available electronically by DEST;
- viii. Relevant and current information regarding living conditions in Australia, including:
  - Indicative costs of living in the city or area in which they have chosen or are considering to live;
  - Accommodation options within reasonable proximity of the Crown College International campus;
  - Public Transport options servicing the Crown College International campus;
  - Specific information regarding OSHC requirements for international students wishing to study in Australia;
  - General information regarding other medical support available to International students while studying in Australia;
  - Where relevant, schooling obligations and options for school-aged dependents of intending international students; including that school fees may be incurred by them.

#### **4.4 International Education Agents**

- 4.4.1 Where Crown College International uses International Education Agents both parties must enter into a written agreement.
- 4.4.2 Crown College International will not accept applications from international students from an International Education Agent or enter into an agreement with an Education Agent if it knows or reasonably suspects the Agent to be:
  - i. Engaged in, or to have previously been engaged in, any dishonest practices including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of transfers between registered providers;
  - ii. Facilitating the enrolment of an international student whom the Education Agent believes or suspects will not comply with the conditions of their student visa;
  - iii. Using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for a person other than a Bona Fide international student;
  - iv. Providing immigration advice when not authorised under the Migration Act 1958 to do so, or intimating that a particular migration or residential outcome may arise as a result of the student partaking in a particular course or courses at Crown College International.
- 4.4.3 Crown College International has a responsibility or duty of care to inform any Crown College International Education Agent, consultant or other representative, of any

legislative or other changes that may affect potential Crown College International applicants or students, whether or not Crown College International believes the Agent or other party should reasonably be aware of the changes in their own right.

4.4.4 Crown College International will undertake training for International Education Agents who are involved in any marketing activity related to Crown College International courses. The session will cover all Crown College International programs and any relevant updates that apply; their key selling points and a thorough revision session detailing all their responsibilities when promoting Crown College International programs or Crown College International.

#### **4.5 Process**

4.5.1 All Crown College International marketing materials must be developed and reviewed to ensure they meet Crown College International's quality guidelines.

4.5.2 All marketing material must be samples must be saved in order to track and review the efficacy of Crown College International marketing strategies.

4.5.3 All new or revised international marketing materials are to be forwarded to all Crown College International Education Agents to ensure that Crown College International's Agents' materials are up-to-date and do not mislead potential students about Crown College International's courses and services.

4.5.4 All promotional and marketing material that is relevant to international students, where it is produced by any marketing section of the organisation, must be checked for compliance and be approved by the Group General Manager.

4.5.5 The Sales and Marketing Officers and Group General Manager are to ensure that an International Prospectus and other appropriate marketing materials are produced and updated yearly (or as required, if sooner) and distributed to relevant International Education Agents and the appropriate Government agencies if applicable.

#### **5. Related Documents**

RTOPRO030 International Education Agent Policy

## 6. Policy Publication

All policies and procedures that are applicable to prospective students and enrolled students (domestic or international) and all relevant organisation employees/contractors are made available on request at all times, and form part of the induction and orientation for employees/contractors and students and are made available via the website (where appropriate), student administration/management systems, learning management system and internal electronic systems.

## 7. Amendment Schedule

Table detailing any amendment made to the policy between review dates:

<b>Date</b>	<b>Modification</b>	<b>Version</b>	<b>By</b>
22.5.2017	Updated formatting and numbering system	2.0	Vanessa Hoppe
23.3.2018	Update National Code 2018	3.0	Vanessa Hoppe

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