



ROYAL
INTERNATIONAL
COLLEGE

RTO Code: 46036 | CRICOS Code: 04153F

MARKETING POLICY AND PROCEDURE

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Table of Contents

1.20. Marketing Policy and Procedure	3
Policy Content	3
Purpose	3
Objective	3
Scope	4
Procedure	4
1.20.1. Marketing Guidelines	4
1.20.2. Required Content and Disclosures in Marketing	5
1.20.3. Use of Third Parties in Marketing	7
1.20.4. Use of National and Qualification Logos	8
1.20.5. Additional Marketing Requirements for CRICOS Providers	8
Roles and Responsibilities	9
Continuous Improvement	11
Confidentiality and Privacy	11
Publication	12
Retention of Records	12

1.20. Marketing Policy and Procedure

Policy Content

Aspect	Details
Regulator	Australian Skills Quality Authority (ASQA)
Standards Referenced	
Legislation / Requirements	

Purpose

This policy ensures that the RTO's marketing and advertising of vocational education and training products and services are carried out with accuracy, integrity, and regulatory compliance. It sets the framework for developing, approving, and distributing promotional materials in accordance with the Standards for RTOs 2025, including any applicable obligations under the ESOS National Code 2018 for international students. This policy also addresses the correct use of national logos and representations to safeguard the reputation of the RTO and the broader training sector.

Objective

The objective of this policy is to:

- Ensure all marketing accurately reflects the RTO's current scope of registration and approved training products.
- Support ethical and transparent communication that allows students to make informed decisions.
- Prevent false, misleading, or deceptive claims across all advertising channels.
- Control the use and approval of all promotional materials prior to release.
- Ensure clarity when promoting nationally recognised training versus non-accredited offerings.
- Guide compliance in marketing involving third parties or agents.

- **Maintain the integrity and credibility of the RTO, the training industry, and associated logos (NRT and AQF).**

Scope

This policy applies to all:

- **Staff involved in creating, reviewing, or publishing marketing and advertising materials.**
- **Contractors, agents, or third parties marketing on behalf of the RTO.**
- **Prospective and current domestic and international VET students.**
- **Marketing activities across all formats, including print, email, social media, websites, signage, and verbal promotions.**

Procedure

1.20.1. Marketing Guidelines

The RTO will ensure that all marketing and promotional activity is:

- **Professional, clear, and compliant with the Standards for RTOs 2025 and relevant legislation.**
- **Designed to protect the integrity of the VET sector and promote transparency to learners.**
- **Undertaken with systems that ensure only current and approved materials are used.**

All marketing and advertising statements must be:

- **Accurate and unambiguous.**
- **Limited to the qualifications and services the RTO is approved to deliver.**
- **Clear in distinguishing between accredited training and other services.**
- **Respectful of the reputation of other education providers and the Australian education system.**

The RTO will ensure:

- **Its legal entity name, trading name (if applicable), RTO code, and CRICOS code (if applicable) are clearly included on all marketing materials.**

- All published content complies with Australian copyright, trademark, privacy, and advertising laws.
- Only qualifications listed on its current scope of registration are promoted.
- Marketing materials avoid comparisons or statements that may discredit other providers.
- Any mention of third-party delivery includes the third party's name and role, with prior written agreement and approval.
- The NRT and AQF logos are used strictly in accordance with the applicable usage conditions provided by ASQA and AQF authorities.

1.20.2. Required Content and Disclosures in Marketing

To ensure ethical and accurate student communications, all marketing and advertising materials must include the following disclosures and avoid prohibited claims.

A. Mandatory Inclusions in All Marketing Materials

- Clearly state the training product code and full title as listed on training.gov.au
- Only promote training products currently on the RTO's scope of registration
- Provide transparent details on:
 - Course fees, including tuition, materials, and incidental costs
 - Payment terms and refund policies, including any applicable conditions
 - Available government funding or subsidies, with eligibility requirements
 - Work placement requirements, where applicable
- Specify the delivery mode (e.g., face-to-face, blended, online)
- Outline the support services available to students and how they can be accessed
- If training or assessment is delivered by a third party, clearly disclose:
 - The third party's name

- Their role (e.g., delivery, assessment, student support)

B. Equipment and Additional Requirements

- Clearly inform students of any required equipment, materials, or IT access they must obtain or provide themselves to participate in the training product
- Include any associated costs, such as safety gear, software licenses, uniforms, or laptops
- Where applicable, explain whether equipment is:
 - Provided by the RTO
 - Provided during placement by a host employer
 - Required to be purchased or arranged by the student

C. Prohibited and Misleading Claims

Marketing must not include any statements that are false, misleading, or deceptive, including:

- **Employment guarantees** - Claims like “guaranteed job” or “you will be employed” are not permitted unless supported by formal, documented industry arrangements
- **Licensing or registration promises** - Do not imply that the course leads directly to a licence or professional registration unless:
 - It is required by law or regulation
 - It is clearly outlined by the relevant licensing authority
- **“Free” or “fully subsidised” training** - Do not use these terms unless:
 - The training is entirely free to the student
 - There are no hidden costs
 - Funding and eligibility conditions are disclosed
- **Misrepresentation of course duration** - Avoid promoting timeframes that:
 - Undermine the AQF volume of learning
 - Are inconsistent with training package or assessment requirements

- Suggest unrealistic accelerated delivery (e.g., “complete in 2 weeks” for a 12-month course)

D. Probationary Employment Clarifications (if promoted)

If any employment pathways or job trial programs are mentioned, such as:

- Traineeships
- Internships
- Probation-based hiring arrangements

These must:

- Be accurately described as opportunities, not guaranteed outcomes
- Specify that participation in the training does not guarantee a job offer
- Include any employer-specific conditions or selection processes, where applicable

1.20.3. Use of Third Parties in Marketing

Where the RTO engages a third party to market or promote its training products, the following procedures must be followed to ensure compliance with SRT0 2025 and to maintain transparency and accountability.

A. Approval and Agreement

- The third party must have a formal, written agreement with the RTO that clearly outlines their roles and responsibilities in marketing, promotion, and student recruitment
- The agreement must state that the third party will act only within the scope authorised by the RTO
- All marketing conducted by a third party must be pre-approved by the RTO’s Compliance Officer or RTO Manager before release

B. Accuracy and Consistency

- Third parties must use only RTO-approved marketing materials or templates
- They must not create, alter, or distribute promotional content without the RTO’s written approval
- All third-party marketing must include the RTO’s name and RTO code

- The third party must not misrepresent the RTO's services, scope of registration, or the outcomes of training

C. Monitoring and Oversight

- The RTO will regularly monitor all marketing activities carried out by third parties to ensure they remain compliant
- This includes regular reviews of websites, brochures, social media, and verbal representations made to prospective students
- Non-compliant marketing will result in corrective action and may lead to the suspension or termination of the third-party agreement

D. Student Awareness

- Students must be made aware that they are enrolling with the RTO, not the third party
- All third-party marketing must make it clear that training and assessment are conducted by or on behalf of the RTO
- The third party must not give the impression that it is the registered training organisation

1.20.4. Use of National and Qualification Logos

The RTO will ensure the use of all nationally recognised training symbols complies with official conditions of use:

- The Nationally Recognised Training (NRT) logo will only be used in connection with training products that are listed on the RTO's scope of registration and meet the standards for nationally recognised training. Use of the NRT logo will strictly follow the specifications set by the national regulator.
- The Australian Qualifications Framework (AQF) logo will only be used in accordance with the official guidelines issued by the AQF Council. It will not be used in marketing or certification unless the RTO is delivering and assessing AQF-aligned qualifications or statements of attainment.

These logos will never be used on materials promoting non-accredited training or services not aligned to the RTO's approved scope.

1.20.5. Additional Marketing Requirements for CRICOS Providers

For RTOs that deliver training to overseas students under CRICOS registration, marketing and advertising must also comply with the ESOS National Code 2018, including the following:

Marketing materials (including websites) must provide prospective international students with:

- Entry requirements, including English language proficiency, prior education, and work experience.
- The possibility of credit transfer or recognition of prior learning.
- Course content, structure, duration, and delivery methods.
- The campus location and description of available facilities and equipment.
- Whether training is delivered by the RTO or via a third party, and full details of any such arrangement.
- The total indicative fees, refund policies, and notice of any potential fee changes during enrolment.
- The grounds for deferral, suspension, or cancellation of enrolment.
- Information about the ESOS framework and a link to the relevant Department of Education resource.
- Information on living in Australia, including cost of living, accommodation options, and any schooling obligations for dependants.

International marketing materials must also:

- Avoid claims about migration, visa outcomes, or guaranteed academic success.
- Reflect accurate start dates and holiday periods applicable to the course.
- Include expiry dates for any promotional offers.
- Be version-controlled and reviewed prior to each intake or term period.

Roles and Responsibilities

Role	Responsibilities
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Chief Executive Officer (CEO) / PEO	- Authorises all marketing strategies, public campaigns, and promotional offers. - Provides final approval for the release of all marketing and advertising materials. - Ensures all marketing practices comply with SRT0 2025, ESOS (if applicable), and consumer law. - Monitors third-party marketing activities and agent agreements.
RTO Manager / Compliance Manager	- Coordinates the drafting, review, and approval process for all promotional content. - Ensures materials include accurate training product codes, fees, support services, and disclaimers. - Maintains version control of all approved marketing documents. - Verifies that only qualifications listed on the scope of registration are promoted. - Ensures proper use of NRT and AQF logos.
Marketing Coordinator / Staff	- Develops marketing drafts in accordance with approved briefs. - Confirms that promotional content distinguishes accredited from non-accredited training. - Ensures information is not misleading and reflects actual delivery methods, entry requirements, and pathways. - Submits all drafts for compliance review before public release.
Trainers / Program Leads	- Provide input on course-specific marketing details, such as delivery modes, equipment needs, and prerequisites. - Report any identified inconsistencies in published materials.

Third Parties / Education Agents	- Market only those training products and services approved and listed under a formal agreement with the RTO. - Comply with this policy and only use marketing materials provided or authorised by the RTO. - Avoid making misleading statements or unauthorised guarantees. - Cooperate with audit and review of marketing activity when requested.
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Continuous Improvement

The RTO applies a continuous improvement approach to its marketing and communication practices. This includes:

- Regularly reviewing all published marketing content to ensure alignment with current training products, scope of registration, and regulatory changes.
- Monitoring feedback and complaints related to marketing accuracy, presentation, or misleading claims, and using these insights to make improvements.
- Auditing third-party or agent marketing activities to ensure adherence to the RTO's approved messaging and standards.
- Updating marketing procedures as required based on changes to training packages, compliance requirements, or student needs.

All improvements are recorded through the RTO's quality assurance and continuous improvement register.

Confidentiality and Privacy

The RTO ensures that any personal information collected through marketing channels—such as enquiry forms, promotional campaigns, and social media is managed in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. The RTO commits to:

- Using prospective student information only for the purpose it was collected.
- Ensuring privacy notices are provided wherever personal data is gathered.
- Preventing unauthorised access, use, or disclosure of student contact details.
- Providing access to privacy-related enquiries and promptly managing privacy complaints.

Publication

This policy is:

- Made available to all RTO staff involved in marketing, including contractors and third-party partners.
- Communicated during staff inductions and refreshed during compliance updates or changes in legislation.
- Accessible via the RTO's internal document management system and distributed to third parties involved in student recruitment.

Retention of Records

To support auditability and version control, the RTO will:

- Retain copies of all finalised marketing and advertising materials (print and digital) for a minimum period of five years.
- Maintain an archive of superseded materials, clearly marked as inactive and not for distribution.
- Record approvals, version numbers, and dates for all public-facing promotional content.
- Keep records of all third-party marketing approvals and related correspondence.