

<b>Institution</b>	Universal English
<b>Policy Name</b>	Marketing Policy and Procedure

## 1. Scope

Universal English (UE) will ensure that its marketing and advertising of all English Language Intensive Courses for Overseas Students (ELICOS) courses and those on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) is conducted in an ethical and accurate manner and is consistent with its scope of registration and Education Services for Overseas Students (ESOS) legislation. Any non-accredited training will also be marketed in line with this policy.

## 2. Purpose

This policy has been developed to ensure that all UE stakeholders understand how the marketing and advertising of its products and services must be conducted, the procedure for and actions required in relation to any marketing activities, to maintain currency and accuracy of marketing.

## 3. Regulatory Alignment

This Policy is created and implemented to comply with the regulatory requirements informed in the:

- Education Services for Overseas Students Act 2000
- National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018): Standard 1 Marketing Information and Practices; Standard 2 Recruitment of an Overseas Student

## 4. Definitions

**Marketing Material:** any print or electronic material, including materials used for the UE website, on social media for promoting UE or any of UE's training and assessment products or services.

## 5. Policy

5.1 UE will ensure the marketing of its education and training services is undertaken in a professional manner and maintains the integrity and reputation of the industry and UE. Therefore, all statements made in any advertising or marketing materials will be:

- Accurate, unambiguous, not misleading and consistent with Australian Consumer Law;
- Only about the services UE offers;
- Designed to clearly delineate accredited courses from non-accredited courses;
- Designed to not detract from the good reputation and interests of the Australian education industry or other educational institutions nor make negative comparisons and/or derogatory statements about them.

**5.2 UE will:**

- a. Ensure that UE's legal name, trading name, ABN and CRICOS number appear on all UE written marketing and other required materials, including in electronic form or makes publicly available for the purposes of:
  - a) Providing or offering to provide a course to an overseas student
  - b) Inviting a student to undertake or apply for a course, or
  - c) Indicating it is able or willing to provide a course to overseas students.
- b. Not give false or misleading information or advice in relation to:
  - a) Claims of association between providers
  - b) The employment outcomes associated with a course
  - c) Automatic acceptance into another course
  - d) Possible migration outcomes, or
  - e) Any other claims relating to the registered provider, its course or outcomes associated with the course.

**5.3** The promotional material will reflect the commencement period and holiday period to which the promotional material relates.

**5.4** UE and its education agents will not actively recruit a student where the student has not completed their first six months of study in their principal course, except where any of the following apply:

- a. The releasing registered provider, or the course in which the overseas student is enrolled, has ceased to be registered;
- b. The releasing registered provider has had a sanction imposed on its registration by the ESOS agency that prevents the overseas student from continuing his or her course at that registered provider;
- c. The releasing registered provider has agreed to the overseas student's release and recorded the date of effect and reason for release in PRISMS;
- d. Any government sponsor of the overseas student considers the change to be in the overseas student's best interests and has provided written support for the change.

**5.5** All marketing must ensure the consistent and true and accurate representation of the services offered by UE.

**5.6** UE will accurately represent training products and services by:

- a. Accurately representing to prospective students training products and services that lead to an award, and that advertised outcomes are consistent with these qualifications;

- b. Providing advice to prospective students on these products and services to ensure clarity of understanding;
  - c. Providing accurate advice on pathways to another qualification and employment opportunities after successful course completion;
  - d. Regularly reviewing and updating marketing material so it is accurate and consistent with scope of registration.
- 5.7 UE will develop its marketing materials, including its website, to ensure that the following information is provided to overseas students prior to enrolment:
  - a. The requirements for acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required;
  - b. Modes of study;
  - c. The course duration and holiday breaks;
  - d. Campus location and a general description of facilities, equipment, and learning and library resources available to students;
  - e. Details of any arrangements with another registered provider, person or business to provide the course or part of the course (where applicable);
  - f. Indicative tuition and non-tuition fees including advice on the potential for fees to change during the student's course and applicable refund policies;
  - g. Information about the grounds on which the student's enrolment may be deferred, suspended or cancelled;
  - h. A description of the ESOS framework, with the link published on website;
  - i. Relevant information on living in Australia, including:
    - a) Indicative costs of living;
    - b) Accommodation options; and
    - c) Where relevant, schooling obligations and options for school-aged dependants of intending students, including that school fees may be incurred.
- 5.8 All marketing materials will meet Australian standards or laws in relation to copyright, identity ownership and privacy.
- 5.9 When developing international marketing materials for international students, UE will ensure that all material is consistent with the cultural and regulatory systems of the countries in which it is used.
- 5.10 All marketing materials containing any form of "offer", will contain an expiry date and be version controlled.
- 5.11 UE will only market those courses that it currently holds on its Scope of Registration.
- 5.12 All names and titles of courses and training will comply with the requirements of the respective training packages and be advertised or marketed accordingly.
- 5.13 All participants will be provided with the following information or reference to the UE policies through relevant marketing materials:

- a. Admission criteria and procedure
- b. Courses and their costs
- c. Refund policy
- d. Complaints and appeals policy

5.14 Third party information that is used in UE's marketing will have written permission from the third party on the use of this information by the college.

5.15 The content of UE's website (consisting of all words, images, etc. within the domain [www.universalenglish.edu.au](http://www.universalenglish.edu.au) / [www.ue.edu.au](http://www.ue.edu.au)) is managed by the Managing Director or delegate.

5.16 If any reference to another person or organisation (such as written or video testimonials, or photos) is used in printed or digital marketing or advertising material, UE will gain consent from the person or organisation before making that reference public. This applies to displaying any photos or videos of other training or educational institutions on UE website, which can lead people to believe UE operates those facilities.

## **6 Procedure**

### **6.1 Material Development**

- a. Initiatives to create new materials or make amendments to existing ones must receive approval from Marketing Manager, or delegate;
- b. Materials will be developed as per the initial approval given by the Marketing Manager. Feedback from stakeholder may be collected during the development process;
- c. The UE Marketing Materials Checklist must be used to ensure regularly requirements are satisfied;
- d. A clearly defined "Draft" document will be submitted to the Managing Director or delegate to review, ensuring they are accurate, containing no false, misleading or deceptive information;
- e. Upon review, a final draft will be produced for approval by the Managing Director or delegate;
- f. Signed and approved hard copies of all final approved materials will be stored in the designated location in repository, and version control register.

### **6.2 Advertising in non-English Press**

All non-English advertising must be checked by a native speaker for accuracy of information and interpretation and authorised by the Managing Director or delegate.

### **6.3 Material Use**

- a. To ensure consistency and accuracy, all UE relevant staff are required to use only the authorised marketing materials and information when communicating with stakeholders. This applies to both face-to-face and electronic interactions. Using the approved

marketing materials ensures a clear and uniform understanding across all communications.

- b. Whenever changes are made to any marketing materials, all internal and external stakeholders will be informed of the changes through written communication (i.e. Email). The revised documents/ access details will then be distributed accordingly and old material will be removed from circulation.
- c. All UE staff is responsible for reporting any errors or inaccuracies discovered in any of UE's marketing materials to Managing Director immediately.
- d. The following materials require UE's legal entity name, UE's trading name, CRICOS provider number, CRICOS course code, UE logo:
  - a) All training materials
  - b) Course brochures
  - c) Student handbook
  - d) Website
  - e) Social media sites such as Facebook, Instagram, YouTube, TikTok
  - f) Email
  - g) Business cards
  - h) Print ads
  - i) Flyers
  - j) Posters
  - k) Any part of marketing that may be separated or pulled out from the marketing materials
  - l) Letterheads
  - m) Signature blocks

#### **6.4 Student Consent**

- a. Photos of any of UE activities intended for publication must be approved for use upon aligning the Letter of Offer and Acceptance (Written Agreement). This agreement allows students to choose whether their photos/videos can be used in UE's promotional materials, unless they notify UE otherwise. For written, video, or photo testimonials, and additional consent will be requested from students as needed.
- b. Any comments, posts and queries by readers must be regularly reviewed. Offensive comments must be brought to the Managing Director's attention and actioned immediately.
- c. All queries must be responded to promptly and appropriately.

#### **7 Joint Advertising**

- a. Educational Agents
  - a) All joint advertising with UE registered educational agent may use the agent's branding if they will be the recipients of any enquiries.

- b) All joint advertising must be approved by the Managing Director or delegate.
- b. Other Institutions or Agencies
  - a) All joint advertising with other institutions or agencies should have the UE logo in a prominent position based on our involvement.
  - b) All joint advertising with other institutions or agencies should be approved by the Managing Director or delegate

### Version History

It is the joint responsibility of the Implementation Officer and Responsible Officer to ensure compliance with this policy.

Responsible Officer	Managing Director		
Implementation Officers	Marketing Officer, Recruitment Officer		
Review Date	19 July 2027		
Approved by			
Managing Director			
Associated Documents			
UE Code of Practice/Conduct Equity Policy and Procedure Privacy Policy and Procedure			
Version	Brief Description of the changes	Date Approved	Effective Date
2.0	<ul style="list-style-type: none"><li>Formatted the document by updating the section headings</li><li>Updated the policy principles</li><li>Updated the procedure as the operational changes</li></ul>	19 July 2024	19 July 2024