



**Marketing, Recruitment &
Advertising Policy**

Marketing, Recruitment & Advertising Policy

Policy Content

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

1. Purpose

The purpose of this **Marketing, Recruitment & Advertising Policy** is to provide clear guidelines for the organisation's approach to marketing and recruiting international students in a way that is ethical, compliant with **ESOS 2025 amendments**, and upholds the organisation's reputation for transparency and integrity.

This policy aims to:

- Ensure that marketing, recruitment, and advertising practices comply with Australian laws and international education standards.
- Protect the interests of students and the organisation by preventing misleading or deceptive advertising.
- Promote ethical recruitment practices in line with **ESOS 2025** and **National Code 2018**.

2. Scope

This policy applies to:

- All marketing materials, promotional activities, and recruitment methods used by the organisation to recruit international students.
- All staff involved in marketing, recruitment, and advertising, including education agents, internal recruitment teams, and third-party partners.
- All advertising channels, including but not limited to online platforms, print media, exhibitions, and promotional events.

3. Policy Statement

The organisation is committed to conducting all marketing and recruitment activities in an ethical, transparent, and compliant manner. All marketing practices will:

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- Reflect **honesty** and **integrity**.
- Provide accurate and up-to-date information.
- Align with the requirements set out in the **ESOS 2025 amendments, National Code 2018**, and other relevant legislative and regulatory frameworks.

Marketing, recruitment, and advertising strategies will be evaluated regularly to ensure compliance and effectiveness, and corrective actions will be taken immediately when necessary.

4. Procedures

4.1. Marketing and Recruitment Practices

Advertising Content

Accurate and Truthful Information:

All marketing and advertising materials, including brochures, websites, social media, and other promotional content, must provide **accurate** and **truthful** information about the following key areas:

1. Courses:

- The content must clearly communicate the **duration, structure, and content** of the courses offered.
- The **prerequisites** for enrolment, such as qualifications or experience required to join the course, must be clearly specified.
- **Learning outcomes** should be accurately represented, ensuring students know what skills, knowledge, or qualifications they will gain upon completion.

2. Enrolment Process:

- A step-by-step breakdown of the enrolment process should be provided, including:
 - **Deadlines** for applications, ensuring that potential students understand the timelines for applying.
 - **Required forms and documents** for enrolment.
 - A clear explanation of the **eligibility criteria**, the application process, and any required assessments.

3. Tuition Fees:

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- Clear, detailed information regarding **tuition fees** should be included in all promotional content:
 - A **breakdown of fees** for each course, including any additional costs such as textbooks, student services, or materials.
 - **Payment deadlines** and instructions on how students can make payments (e.g., online, instalment plans).
 - Information on whether there are **refund policies** or financial assistance available for students in certain circumstances.

4. **Student Support Services:**

- The organisation must provide information about the **student support services** available to international students, including:
 - **Orientation programs** to assist students in settling into life and study in Australia.
 - **Welfare services** including counselling, mental health support, and crisis management.
 - **Academic assistance** available, such as tutoring, mentoring, and resources to support students in their academic progress.

5. **Visa Requirements:**

- Accurate information about the **student visa process**, including:
 - **Visa types** and eligibility criteria.
 - The required **documentation** for the visa application process.
 - **Visa conditions** and how they relate to the course of study (e.g., study load, attendance requirements).

All of this information must be **prominently displayed** and **regularly updated** to ensure that it reflects the most current requirements, fees, and services.

Avoiding Misleading or Deceptive Information:

The organisation will ensure that **no promotional material** misleads or deceives prospective students about the organisation's services or offerings. This includes:

1. **Course Outcomes:**

- Claims about the potential **employability** of graduates or specific job placements after graduation must be **realistic** and **supported by evidence**.

- The organisation will not make exaggerated claims about post-graduation opportunities unless they are verifiable and proven.

2. Institutional Quality:

- Promotional content will not misrepresent the quality of the institution, course delivery, or faculty.
- Claims of ranking or accreditation must be **authentic** and **verifiable** through official sources.

3. External Partnerships:

- If the institution collaborates with external organisations or has partnerships, these relationships must be **accurately described** and **clearly defined**.
- Any **affiliation with other providers** (e.g., university partnerships) must be transparently disclosed to avoid misleading students.

All advertising will aim to present a **fair** and **transparent representation** of the organisation and its offerings, ensuring that students are not misled about their educational prospects or outcomes.

CRICOS Code Disclosure:

Each **CRICOS-registered course** must clearly display the **CRICOS code** in all advertising materials, including websites, brochures, and other promotional content. This ensures compliance with **ESOS 2025 amendments** and provides transparency for international students. The CRICOS code helps students easily identify courses that are recognised for enrolment under the **Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS)**.

The CRICOS code disclosure is essential for:

- **Regulatory transparency**, ensuring students are only enrolling in courses that meet the necessary legal and educational standards for international students.
- Demonstrating the organisation's **compliance** with the **ESOS framework**, which protects international students.

Use of Testimonials and Endorsements:

Authenticity and Accuracy:

- **Testimonials, case studies, or endorsements** provided by current or former students must be **genuine** and **based on real experiences**. This means that any student feedback or success stories used in marketing materials (e.g.,

brochures, website, social media) must reflect the **actual experiences** of the individuals sharing them.

- These testimonials should be **unmodified** and **unaltered** to ensure they remain truthful and accurately represent the student's journey. For example, if a testimonial includes comments about the student's success after completing the course, those statements must not be exaggerated or fabricated.

Avoiding Manipulation or Misrepresentation:

- The organisation will **never manipulate** or **misrepresent** testimonials to create an impression that may deceive or mislead prospective students.
 - **Misleading testimonials** (e.g., claiming that a student achieved a job immediately after graduation when the real situation may differ) are prohibited.
 - Any **endorsements** from students or former students used in promotional content must reflect the **actual outcomes** that were realistically achievable. There should be no **false promises** about course outcomes or employment prospects that could set unrealistic expectations for potential students.

Compliance with Consumer Protection Laws:

- All **testimonials** must comply with **consumer protection laws**, which ensure that all marketing content, including student testimonials, is not misleading or deceptive.
- **Unrealistic expectations** (such as guaranteeing jobs, salaries, or placements) are strictly prohibited. Testimonials should focus on the **real, tangible benefits** that students have gained from studying with the organisation.
- Students providing testimonials must also be **informed of their rights** regarding their participation in these marketing materials. They should be aware of the **content** being used and provide **informed consent** before their experiences are shared publicly.

Website and Social Media:

Up-to-Date and Accurate Information:

1. Course Details:

- The organisation's **website** must contain clear, **up-to-date information** about all the courses offered to international students. This includes:
 - **Course duration** and the **content** covered.

- **Entry requirements** for prospective students, such as academic qualifications, language proficiency, and other prerequisites.
- **Tuition fees** and any additional costs related to the course (e.g., materials, books, etc.).
- Clear **academic outcomes** expected from completing each course, including skills and qualifications that will be attained.

2. Admission Processes and Visa Requirements:

- The **website** should provide a clear outline of the **admission process**, detailing:
 - How to apply for the courses, including **step-by-step instructions** and necessary documents.
 - **Visa requirements**, including the types of visas students can apply for, eligibility criteria, and any visa-specific conditions that students need to be aware of.
 - **Application deadlines**, to guide students in submitting their applications on time.

3. Support Services:

- The website must detail the **support services** available for international students, which could include:
 - **Orientation programs** to help students settle into life and study in Australia.
 - **Welfare services** such as counselling, student well-being programs, and assistance for students experiencing difficulties during their studies.
 - **Accommodation assistance**, which might include helping students find housing options, whether on-campus or in the local community.
- Students should have easy access to information about the **services** available to them before and during their studies to help them succeed academically and personally.

Social Media Adherence:

- **Social media platforms** (such as Facebook, Instagram, LinkedIn, etc.) used by the organisation must also **adhere to the same principles** as the website. This means the content shared on these platforms must be:

- **Accurate, truthful, and reflective of the information provided on the website.**
- **Regularly updated** to reflect **changes in course offerings, visa requirements**, or any other **relevant updates** to the organisation's services.
- All promotional content, including photos, testimonials, and student stories, must remain consistent with the **values** and **accurate representation** of the organisation's services.
- Social media posts must be **engaging** and **transparent**, reflecting the real experiences of students and the organisation's commitment to quality education, student support, and visa compliance.

4.2 Recruitment through Education Agents (ESOS 2025 Amendments Compliance)

Education Agent Agreements

1. Formal Agreement Requirements:

- All **education agents** must sign a **formal agreement** with the organisation before they can represent the institution to prospective international students.
- The agreement must specify:
 - **Roles and responsibilities** of the education agent in the recruitment process.
 - Compliance with the **ESOS 2025 amendments**, including obligations related to **accurate course information, visa processes**, and **student welfare**.
 - **Standards of conduct** required, such as:
 - Providing **correct and up-to-date information** regarding the organisation's offerings, fees, enrolment procedures, and student support services.
 - Adhering to **ESOS 2025 obligations** and other regulatory requirements concerning the recruitment and enrolment of international students.
 - The **commission structure** including payment terms, basis for remuneration (per enrolment, successful visa grant, etc.), and the associated conditions for commission eligibility.

The **Compliance Officer** will ensure that all agents understand the **requirements under ESOS 2025** and that they are **fully aligned** with the organisation's **ethical recruitment policies**.

2. Agent Training on ESOS 2025 Compliance:

- Education agents will undergo **training** on ESOS 2025 regulations to ensure they understand:
 - The **correct processes for enrolment** and **visa requirements** for international students.
 - How to **accurately represent** the organisation and its offerings.
 - The importance of **honesty in marketing and recruitment practices**.
- The training will focus on the agent's responsibilities under **ESOS 2025 amendments**, ensuring they are aware of the **legal requirements** for advertising, recruitment, and **student welfare protection**.

Agent Performance Monitoring

1. Monitoring and Evaluation of Agent Activities:

- The organisation will regularly **monitor and assess** the performance of its education agents to ensure compliance with the **ESOS 2025 amendments** and its **internal standards**.
 - This will include reviewing:
 - **Number of enrolments** each agent recruits.
 - **Visa approval rates** for the students recruited by the agent.
 - **Feedback** from students about their recruitment experience (focusing on transparency, accuracy, and the quality of information provided by the agent).
 - Compliance with **advertising** regulations as outlined in **ESOS 2025** and the **National Code 2018**.

2. Performance Metrics:

- The **key performance indicators (KPIs)** used to evaluate agents will include:
 - **Conversion rates** from student enquiries to enrolments.
 - **Visa success rates** for the students recruited.

- **Student satisfaction surveys** regarding the recruitment process.
- The **Compliance Officer** will ensure these metrics are aligned with **ESOS 2025 regulations**, focusing on the **accuracy of information** provided to students.

3. Periodic Audits of Agent Activities:

- The organisation will conduct **periodic audits** to ensure that the agent's marketing and recruitment practices comply with:
 - **ESOS 2025 amendments**, which require accurate representation of courses, student welfare, and visa conditions.
 - **National Code 2018**, ensuring that all recruitment practices uphold ethical standards and promote transparency.
- These audits will include checks on:
 - The **accuracy of advertising** and promotional materials provided by agents.
 - Compliance with **visa conditions** and **tuition protection**.
- If any discrepancies or unethical practices are identified, the organisation will take appropriate corrective actions to address the issue.

4. Non-Compliance Actions:

- If an agent is found to be non-compliant with **ESOS 2025 amendments**, the organisation will take necessary actions, including:
 - **Training** to rectify the issue and ensure the agent understands the regulatory requirements.
 - If necessary, the organisation may **terminate the agreement** with the agent, particularly if the non-compliance involves misleading students or violating **ESOS 2025 obligations**.

5. Reporting and Documentation:

- The organisation will maintain thorough records of all marketing and recruitment activities, including:
 - Copies of all **agent contracts** and agreements.
 - **Performance reviews** of education agents.
 - **Audit reports** that assess compliance with ESOS 2025 amendments.

- **Correspondence** related to agent activities and feedback from students.
- These records will be retained for **at least five years** for compliance purposes and to meet **regulatory requirements** under **ESOS 2025**.

4.3 Compliance with ESOS 2025 and National Code 2018

Advertising Standards

1. Compliance with ESOS 2025 Amendments:

- All marketing and advertising materials, including brochures, websites, social media, and other promotional content, must **fully comply** with the **ESOS 2025 amendments** and the **National Code 2018**.
- The information provided in all advertising materials must be:
 - **Accurate:** The course details must be truthful regarding course duration, content, entry requirements, learning outcomes, and tuition fees.
 - **Transparent:** Ensure that all fees are fully disclosed, including tuition fees, material fees, and other additional costs.
 - **Non-deceptive:** All materials should avoid making misleading or exaggerated claims about the institution, course outcomes (such as employment prospects or work placements), or post-graduation outcomes (like visa approval or employment rates).
 - **Clear disclaimers:** Information regarding visa status, enrolment processes, refund policies, and attendance requirements must be **clearly stated**, with no room for misinterpretation. Any advertisement must include **disclaimers** to clarify that enrolment is subject to visa approval.

2. Visa Requirements and Tuition Protection:

- All advertising materials must clearly specify:
 - **Visa eligibility** requirements, explaining the types of student visas available and the necessary criteria for obtaining these visas.
 - **Tuition Protection Scheme (TPS)** information, ensuring prospective students are aware of their rights and the protections in place for them under **ESOS 2025**.
 - **Student Welfare:** Information about support services, such as orientation programs, accommodation assistance, and mental

health support services, must also be disclosed in marketing materials to ensure compliance with student welfare obligations.

3. **Disclosure of CRICOS Code:**

- Each **CRICOS-registered course** will display its **CRICOS code** in all advertising and promotional materials (online and offline), ensuring that prospective students can verify the registration status of the course.
- The inclusion of the **CRICOS code** is a legal requirement under ESOS 2025 and must be prominently displayed on all marketing platforms, including websites, brochures, and social media.

4. **Misleading or Deceptive Advertising:**

- The organisation will take steps to ensure that no advertising material:
 - **Misrepresents the institution**, its courses, or student outcomes.
 - **Promises guaranteed visa approvals**, job placements, or academic success beyond what is realistically achievable.
 - **Exaggerates** any claims related to the reputation of the institution or employment opportunities post-graduation.
- Any material found to be misleading or deceptive will be immediately **removed** or **corrected**.

5. **Terms and Conditions in Advertising:**

- Every advertising piece must include **clearly visible** disclaimers, such as:
 - The **enrolment process** and the **terms and conditions** of enrolment.
 - **Refund policies**, including circumstances under which refunds may be issued.
 - **Student obligations**, such as **attendance requirements**, **academic progress**, and compliance with visa conditions.
- These terms and conditions should be in **plain language**, easily understandable by prospective students, to prevent any confusion or misinterpretation of the enrolment terms.

Regulatory Reporting

1. **Compliance Officer Responsibility:**

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- The **Compliance Officer** is responsible for ensuring that **all marketing activities**, including advertisements, promotions, and education agent conduct, are in compliance with **ESOS 2025 regulations** and the **National Code 2018**.
- The Compliance Officer will **regularly review** marketing materials (both online and offline) to ensure they are aligned with the regulatory requirements.
- If any marketing content is found to be **non-compliant**, corrective actions will be initiated, which may include:
 - **Removal** or **correction** of non-compliant material.
 - **Training** for staff or agents responsible for creating or distributing the materials.

2. Reporting Non-Compliance:

- The organisation will promptly report any **non-compliance** with marketing regulations to **relevant regulatory authorities**, including:
 - **ASQA (Australian Skills Quality Authority)**.
 - **Department of Home Affairs** (for visa-related matters).
 - **ESOS agencies** (if student welfare or other student-related services are impacted).
- **Documentation of all marketing materials**, including advertisements, agent agreements, and any marketing campaigns, will be maintained for **auditing and compliance purposes**. This documentation will be retained for **at least five years**, in line with **ESOS 2025 amendments**.

Social Media and Online Marketing Compliance

1. Adherence to ESOS 2025 on Social Media:

- All social media platforms used by the organisation (Facebook, Instagram, LinkedIn, etc.) must comply with **ESOS 2025 regulations**. Social media content will:
 - Provide **accurate, truthful, and compliant** information in line with the standards set in **ESOS 2025** and **National Code 2018**.
 - Include the **CRICOS code** for each course offered and ensure that the information on visa and course requirements is up-to-date and clearly explained.

- **Regularly updated** to reflect the latest changes in the organisation’s offerings, visa requirements, or regulatory obligations.

2. Correcting Outdated or Incorrect Information:

- Social media content should be **regularly monitored** for outdated or incorrect information. Any inaccurate content should be **corrected or removed** immediately to prevent misleading potential students.
- Social media platforms must also comply with the **requirements for advertising, disclaimer inclusion, and transparency** in communication about the organisation’s offerings, as per the **ESOS 2025 amendments**.

3. Transparency and Compliance:

- Social media posts must reflect the same **transparency and compliance** standards required in traditional marketing materials (e.g., brochures, websites). This includes:
 - **Clear and accurate information** about courses, fees, student support, and visa requirements.
 - **Disclaimers** about visa approval, enrolment terms, and student obligations, as required by **ESOS 2025**.

5. Roles and Responsibilities

Role	Responsibility
Compliance Officer	Ensure that all marketing and recruitment activities comply with ESOS 2025, National Code 2018, and other regulations.
Marketing Department	Develop and maintain accurate marketing materials, including course brochures, website content, and advertisements.
Senior Management	Approve marketing strategies and ensure overall compliance with regulatory requirements.
Education Agents	Adhere to the terms of the recruitment agreement, provide accurate information to students, and comply with ESOS regulations.
Student Services	Provide support and guidance to students throughout the recruitment process, ensuring they understand the enrolment and visa processes.

6. Confidentiality, Publication & Retention of Records

Confidentiality:

- All student data, enrolment information, and recruitment processes will be handled confidentially. Only authorised personnel will have access to this information.
- Education agents are required to maintain the confidentiality of student details and recruitment data.

Publication:

- The **Marketing, Recruitment & Advertising Policy** will be made publicly available to staff, education agents, and potential students through the organisation's website and student portals.
- The policy will be reviewed and updated as necessary to ensure compliance with regulatory changes and best practices.

Retention of Records:

- The organisation will maintain records of all marketing, recruitment, and advertising materials, as well as agent agreements, for a minimum of **five years**, as required by **ESOS 2025 amendments**.
- These records will be stored securely and made available for regulatory review or audits.

7. Continuous Improvement

- The organisation will review this policy annually to ensure its continued relevance and effectiveness in the recruitment and marketing of international students.
- Feedback from stakeholders, including staff, students, education agents, and regulatory authorities, will be considered to improve the recruitment processes and marketing materials.