



## QAF034 ETHICAL MARKETING POLICY AND PROCEDURE

### 1. Overview

- 1.1 Higher Education Leadership Institute (“the Institute”) is committed to ensuring that all its marketing is conducted in a professional and ethical manner. Therefore, all statements made in any marketing or associated promotional materials is:
- a. accurate, unambiguous and not false or misleading;
  - b. only about the services the Institute offers;
  - c. designed to clearly delineate accredited courses from non-accredited courses and other services the Institute offers;
  - d. designed not to 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.
- 1.2 This policy is designed to reflect the intent of Standard 7 of the *Higher Education Standards Framework*<sup>1</sup> and Standard 1 of the *National Code*<sup>2</sup>.

### 2. Policy principles

- 2.1 Whether express or implied, all marketing and associated promotional material must:
- a. not draw false or misleading comparisons with other education providers or courses;
  - b. not give false or misleading representations in relation to:
    - associations with other providers or organisations,
    - the outcomes associated with undertaking a course,
    - the entry requirements for a course (including English language requirements),
    - any work-based training required to undertake the course,
    - eligibility for acceptance into another course, or
    - possible migration outcomes from undertaking a course;

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<sup>1</sup> Higher Education Standards Framework (Threshold Standards) 2021, Department of Education, Skills and Employment, 24 April 2021 <https://www.comlaw.gov.au/Details/F2015L01639>

<sup>2</sup> National Code of Practice for Providers of Education and Training to Overseas Students 2018  
<<https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx>>

- accurately represent to prospective students accredited courses that lead to AQF qualifications and ensure that stated outcomes are consistent with those qualifications;
- use any third-party logos according to their conditions of use;
- not refer to any third party without their express written permission;
- appropriately identify the Institute by including the Institute's registered name and CRICOS number;
- identify accredited courses leading to an AQF qualifications separately from non-accredited courses and any other services provided by the Institute;
- used only the accredited course title/s in advertising and marketing campaigns;
- uphold the reputation of Australia's tertiary education sector;
- be approved by the CEO prior to its dissemination.

### **3. Marketing accredited courses**

- 3.1 When marketing its accredited courses, the Institute will take care to clearly identify accredited courses leading to an AQF qualifications separately from any other services provided by the Institute.
- 3.2 Only those courses that are accredited by TEQSA will be described as such. Likewise, any courses that are accredited by a professional accrediting body for the purposes of registration to practise, will not be described as such unless such accreditation has been obtained.
- 3.3 Where subjects are offered separately from an accredited course and are represented as eligible for gaining credit towards a qualification, the Institute will clearly specify the qualification for which credit may be gained and clearly define the terms on which credit may be granted.
- 3.4 For each accredited course relevant and timely information for students is publicly available that includes:
  - a. details of the course being offered, including accreditation status, course learning outcomes and delivery arrangements;
  - b. constituent subjects that make up the course, including credit points, EFTSLs and any pre-requisites;
  - c. assumed knowledge to undertake the course;
  - d. requirements for access to technology to undertake an online course or subject;
  - e. course admission requirements and application dates;
  - f. arrangements for recognition of prior learning



- 3.5 To enable access for the vision impaired, HELI's website will be designed so it is compatible with standard devices and programs that assist vision impaired people<sup>3</sup>. For example, this means that text on the HELI website will be actual text and not embedded within graphics.

#### **4. Use of agents**

- 4.1 Where agents or other third parties are engaged to represent or promote the Institute they will be bound by formal contracts with the Institute, their performance will be monitored and prompt corrective action will be taken in the event or likelihood of misrepresentation or unethical conduct.

#### **5. Third party permissions**

- 5.1 The Institute will at all times obtain prior written permission from any person or organisation for use of any marketing or promotional material that refers to that person or organisation and will abide by any conditions of that permission.

#### **6. Approval protocols**

- 6.1 The Marketing and Communications Manager is responsible for checking that all advertising and promotional materials are in accordance with this policy. This involves proofing and checking all advertisements, printed or electronic brochures, social media posts, web pages or other promotional material prior to publication, printing or upload to the webserver or internet.
- 6.2 The Marketing and Communications Manager will confirm their approval of the promotional material by sending the final proof to the CEO.
- 6.3 After the Marketing and Communications Manager has approved the promotional material and sent it to the CEO, the CEO must review and approve the material in writing before it can be published. In other words, all marketing and promotional materials must pass through a two-step approval process.
- 6.4 A copy of the approved promotional material will be kept on record.

#### **7. Social media**

- 7.1 Social media is simply another form of promotional communication and is covered by this policy. Therefore, social media content should not be treated differently to any other promotional material.
- 7.2 Any social media content must be approved according to the protocols outlined in this policy.

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<sup>3</sup> <https://www.makeuseof.com/tag/5-ways-browse-web-youre-blind-visually-impaired/>



## 8. Recruitment of international students

- 8.1 The Institute will take reasonable steps to identify and not actively recruit international students where this conflicts with its obligations under Standard 7 of the National Code 2018 regarding international student transfers.

## 9. Version history

Version	Approved by	Approval Date	Details
1.0	Executive Management Committee	4 May 2018	Document creation and initial approval
1.1	Marketing and Communications Manager	8 October 2019	Minor updates to include marketing to international students
1.2	Marketing and Communications Manager	3 August 2021	Minor updates to address wording and HESF2021 changes.

Document owner: Marketing and Communications Manager