
PROCEDURE C4.1-P4.1

MARKETING AND INFORMATION PROCEDURE

1.0 INTRODUCTION

1.1 Related Policy

Marketing and Information Policy

1.2 Purpose

This procedure outlines the ACHW quality assurance processes in the development and review of ACHW marketing collateral and promotional activities (including collateral and activities by Third Party Partners).

1.3 Scope

This procedure applies to all ACHW accredited and non-accredited marketing and promotional collateral used for student recruitment, Third Party Partners, and ACHW staff.

1.4 Scope Exceptions

None.

2.0 RESPONSIBILITIES

a. The Chief Marketing Officer is responsible for:

- ensuring marketing and promotional collateral is developed in line with the Marketing and Information policy and procedure.
- providing an induction and/or ongoing training Marketing team and Third Party Partners.
- consulting with the Chief Education Officer Higher Education and Chief Quality Officer in the development of new marketing collateral.
- collateral before it goes to the marketplace.

b. The Chief Quality Officer:

- leads reviews of marketing collateral and promotional activities to ensure ongoing compliance with legislative requirements.
- The Chief Quality Officer is responsible for reporting findings of the marketing and collateral reviews to the ACHW Corporate Board via the Audit and Risk Committee.

- The ACHW Corporate Board oversees the ACHW brand and representation of ACHW via its marketing and promotional collateral.

3.0 PROCEDURE

3.1 Development

1. The Chief Marketing Officer leads marketing campaigns and coordinates the development of marketing materials.
2. Third Party Partners (TPP) permitted under their contract to create marketing collateral must provide an initial proposal to the Chief Marketing Officer for approval. Where appropriate the Chief Marketing Officer will liaise with the Senior Compliance Manager Higher Education to ensure there are no restrictions applied to a third party partner relating to marketing collateral.
3. For marketing material and promotional activities that relate to academic program content and delivery the Chief Education Officer Higher Education will review and ensure accurate information on content including but not limited to:
 - a. Course and unit outlines
 - b. Admission criteria
 - c. Credit and Recognition of Prior Learning
 - d. Course objectives
 - e. Career outcomes
 - f. Resources
 - g. Assessment
 - h. Facilities and learning environment
 - i. Facilitators and support services
4. In the case of non-accredited courses, the Chief Marketing Officer will liaise with the Senior Manager Compliance Higher Education to ensure that there is no impact on ACHW's obligations with the Higher Education Threshold Standards Framework 2021, and the Higher Education Support Act 2003.
5. The Chief Marketing Officer will oversee that the development of the marketing collateral and promotional activities and ensure:
 - a. Requirements set by the *Marketing Compliance Checklist* (refer Annexure 1) are met.
 - b. third party logos are used in line with written authorisation or published guidelines.

3.2 Approval

1. The Chief Marketing Officer provides final sign off prior to marketing collateral ‘going live’; this includes collateral developed by TPP.

3.3 Review

1. The Senior Compliance Manager Higher Education leads the review of existing marketing collateral as part of the ACHW quality assurance processes:
 - a. On an annual basis to ensure ongoing information remains current and accurate.
 - b. Where there is notification of a potential/actual breach or a complaint received.
2. The Senior Compliance Manager Higher Education is responsible to maintain current information on the ACHW website as required by Standard 7.3.1 of the HESF, as outlined in *Annexure 2: Website Information Management Checklist* of this procedure.
3. Reviews of TPP will be performed in line with the ACHW Third Party Policy and Procedure.
4. Outcomes of marketing reviews including rectification actions are reported to the Corporate Board via the Audit and Risk Committee.

4.0 DEFINITIONS

- **Third Party Partner** means an organisation, other than ACHW, providing education services to students on behalf of ACHW via a written agreement.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- ACHW Marketing and Information Policy
- ACHW Third Party Policy and Procedure
- [Higher Education Threshold Standards Framework 2021](#)
- [Higher Education Support Act 2003](#)
- [Higher Education Provider Guidelines 2021](#)
- [Competition and Consumer Act 2010](#)
- [Australian Competition and Consumer Commission \(ACCC\): False or misleading claims](#)
- [Australian Competition and Consumer Commission \(ACCC\): social media](#)

- [Avoiding unfair business practices: A guide for businesses and legal practitioners](#)

6.0 POLICY/PROCEDURE OWNERSHIP

Policy Owner	Chief Quality Officer
Status	Reviewed September 2025
Approval Authority	ACHW Corporate Board
Date of Approval	11/09/2025
Effective Date	15/09/2025
Implementation Owner	Chief Marketing Officer
Maintenance Owner	Senior Compliance Manager Higher Education
Review Due	October 2027

7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C4.0-P4.0	18 October 2022	Corporate Board	New Procedure established.
C4.1-P4.1	11 September 2025	Senior Compliance Manager Higher Education	Minor administrative changes <ul style="list-style-type: none"> • Update to staff titles • Template revised following benchmarking

ANNEXURE 1: MARKETING COMPLIANCE CHECKLIST

Document Purpose:	The checklist is used to guide and inform: <ul style="list-style-type: none"> • Development of marketing collateral for ACHW and relevant Third Party Partners. • Quality assurance reviews.
Version:	1
Last updated:	11/10/2022
Items reviewed (as applicable):	<input type="checkbox"/> Website <insert url or attach screenshot> <input type="checkbox"/> Brochures <insert url or attach file> <input type="checkbox"/> Social Media <insert url or attach screenshot> <input type="checkbox"/> Course Guides <insert url or attach file> <input type="checkbox"/> Other: <insert description> <insert url or attach file>
ACHW staff member completing checklist	<Insert>
Date	<Insert>

REPRESENTATION AND INFORMATION		✓	Comments
1. MANDATORY PROVIDER INFORMATION HESF (2021) B1.1.3			
1.1.	The Provider (ACHW) is unambiguously identified.	<input type="checkbox"/>	
1.2.	The Provider name (ACHW) is referenced consistently, including variations of the name used on an everyday basis.	<input type="checkbox"/>	
1.3.	The TEQSA provider identification number and provider category are listed.	<input type="checkbox"/>	
1.4.	Brand marks and disclaimers are listed and used correctly.	<input type="checkbox"/>	
2. MARKETING INFORMATION HESF (2021) 7.1, 7.2; HESA 19-95			
2.1.	The material is consistent with Australian Consumer Law, and is not false, misleading, or deceptive	<input type="checkbox"/>	
2.2.	All statements, claims and testimonials made relating to the provider and/or its services and offerings are true and accurate, and can be substantiated	<input type="checkbox"/>	
2.3.	Images in the material provide a realistic representation of the study environment	<input type="checkbox"/>	
2.4.	FEE-HELP reference used only on approved courses.	<input checked="" type="checkbox"/>	
2.5.	Link to information relating to FEE-HELP including schedule of fees is provided.	<input type="checkbox"/>	
2.6.	Permission has been obtained (and retained on file) for use of all imagery, audio, personal information, and testimonials (including owners of copyright).	<input type="checkbox"/>	
2.7.	Third party/ Government logos are used in line with written authorisation or published guidelines.	<input type="checkbox"/>	

REPRESENTATION AND INFORMATION		✓	Comments
2.8.	If applicable, reference to any association with other persons or organisations that deliver the course in which a student intends to enrol/may enrol on behalf of ACHW.	<input type="checkbox"/>	
2.9.	No claim is made in regard to securing a migration outcome from undertaking any course offered.	<input type="checkbox"/>	
2.10	No guarantee of a successful education assessment outcome is made	<input type="checkbox"/>	
3. COURSE INFORMATION HESF (2021) 1.1, 7.1, 7.2			
3.1.	Accreditation status. If non accredited there is clear reference and use of disclaimers to separate it from the accredited courses offered by ACHW.	<input type="checkbox"/>	
3.2.	Reference to the course qualification, award and other outcomes is made	<input type="checkbox"/>	
3.3.	If applicable, professional accreditation of the course is disclosed	<input type="checkbox"/>	
3.4.	Details on the design, content, assessment methods, delivery mode, duration, structure, holiday breaks and outcomes of the course	<input type="checkbox"/>	
3.5.	Tuition and non-tuition fees including FEE-HELP liabilities	<input type="checkbox"/>	
3.6.	Admission criteria including Pre-requisites.	<input type="checkbox"/>	

Additional Notes:	
Rectification Actions (if applicable)	

Sign off	Name	
	Position	
	Signature	
Dated		

ANNEXURE 2: WEBSITE INFORMATION MANAGEMENT CHECKLIST

As required by the Standard 7.3.1 Information Management of the Higher Education Standards Framework (Threshold Standards) 2021 and the Higher Education Provider Guidelines 2021 ACHW and relevant Third Party Partners make the following information publicly available, easily accessible and without provision of login or contact information:

- a. The provider registered name, trading name, ABN, physical address regulatory status and IHE status.
- b. The ACHW constitution which establishes the entity.
- c. Members of its Corporate Board and Executive Leadership Team.
- d. A statement of ACHW's financial standing.
- e. Indicative total student enrolments based on recent actual enrolments (or in the case of a new course an expected range should be used).
- f. A list of all accredited higher education courses offered including estimated annual enrolments.
- g. High level organisational chart including units that delivery courses of study.
- h. Campus addresses where higher education is offered to students.
- i. An overview of campuses, facilities, learning resources and services provided for students.
- j. Reference to third party partnerships delivering courses on behalf of ACHW
- k. The process to lodge a complaint/ appeal.
- l. Contact details for student support and enquiries.
- m. For FEE HELP approved courses:
 - i. The mode of delivery of each unit of study
 - ii. Whether the unit is delivered by ACHW or a third party
 - iii. Whether FEE-HELP assistance is available and if any limits or conditions are imposed on ACHW's approval as a HE provider.
 - iv. Schedule of student tuition fees are available at least three months before the earliest enrolment date for the unit of study.
 - v. Census dates and intake dates
 - vi. Information regarding FEE-HELP limit, eligibility criteria, link to the study assist booklet and applicable loan fees.