

# Marketing and Advertising Policy and Procedure

Compliance Requirements for RTOs 2025

Part 2 – Division 1 – Information and Transparency

## 1. Purpose

This policy ensures that Ella Bache College's marketing practices support consumer protection, prevent misleading representations, and maintain the integrity of the VET sector. It applies to all advertising, social media, brochures, website content, and third-party recruitment arrangements.

## 2. Rationale

This Marketing and Advertising Policy and Procedure is essential to uphold the integrity, transparency, and regulatory compliance of Ella Bache College's public communications and promotional activities. In a highly regulated education and training environment, prospective students must be provided with accurate, clear, and ethical information about the services offered, the nature of training products, any financial implications, and the identity of the training provider or third-party recruiter.

## 3. Policy Statement

Ella Bache College is committed to the highest standards of information accuracy, transparency, and integrity in accordance with Division 1 of the Compliance Standards for NVR Registered Training Organisations 2025. This commitment ensures that all marketing, advertising, and public information reflect the true nature, scope, and regulatory status of the services the College offers and that prospective and current students can make informed decisions based on accurate and ethical representations.

As part of our compliance obligations, Ella Bache College ensures that:

### 1. Marketing and Advertising

All advertisements and promotional materials, whether produced internally, by third parties, or by engaged experts:

- Include the College's registration code or a direct link to the National Register.
- Accurately describe the training and assessment offered, clearly distinguishing between nationally recognised training that leads to AQF certification and other non-accredited training services;
- Include complete and correct details of financial support arrangements, such as eligibility for VET Student Loans or subsidies, if referenced;

- Avoid any reference or implication of a connection to another organisation or individual unless written consent has been obtained;
- Include the correct code and title of each training product, as published on the National Register, and confirm its inclusion on our scope of registration;
- Avoid reference to training products that are no longer current, unless they remain on scope and enrolments are still valid;
- Clearly identify if a third party or external expert is involved in any aspect of service delivery, including recruitment, training, or assessment.
- The NRT logo will only be used on marketing materials that directly relate to training products listed on the College's scope of registration and in accordance with the conditions outlined in Schedule 4 of the Standards for RTOs 2025. It will not be used for non-accredited courses or services.

## 2. Guarantees and Inducements

Ella bache College does not make false, misleading or unrealistic guarantees or inducements. Specifically, it does not:

- Guarantee that any student will successfully complete a course;
- Represent that a course can be completed in a way that is inconsistent with the training product requirements;
- Guarantee that a student will achieve a particular employment outcome, unless such an outcome is within the College's control and has been formally confirmed.

All promotional activities are governed by our internal approval process to ensure compliance with these standards before publication.

Furthermore, this policy reinforces continuous improvement through regular audits and ensures that both staff and partners are accountable for maintaining compliance in all advertising and promotional channels.

## 4. Scope

This policy and procedure applies to all marketing, advertising, and public information activities conducted by Ella Bache College whether carried out internally, through staff, or via third-party arrangements.

It applies to:

- All staff, contractors, and agents responsible for developing, approving, or distributing marketing and promotional materials;
- All training products listed on the College's scope of registration, including nationally recognised qualifications, accredited courses, skill sets, and units of competency;
- Any non-accredited training or services promoted by the College;
- All third parties or experts engaged by the College to deliver services or recruit students;

- Any print, digital, broadcast, or verbal communication representing the College to prospective or current students, industry, or the public.

This policy also governs how Ella Bache College represents its regulatory status, financial support options, and enrolment conditions, and supports compliance with Standard 2.1 of the Standards for RTOs 2025.

## 5. Definitions

**Accurate information:** Means information that is complete, correct, and not misleading or ambiguous in any way. This includes accurate descriptions of training products, fees, entry requirements, and Ella Bache College's scope of registration.

**Advertising:** Refers to all paid or unpaid materials or activities designed to promote the College or its services, including social media posts, brochures, website content, digital ads, radio, signage, or verbal promotions.

**AQF Certification Documentation:** Refers to a testamur, statement of attainment, or record of results issued by a Registered Training Organisation under the Australian Qualifications Framework.

**Marketing Material:** Any written, digital, audio, or verbal content developed to promote the College or its training products. This includes course brochures, flyers, presentations, social media posts, and webpages.

**Nationally Recognised Training:** Training that leads to a qualification or statement of attainment under the Australian Qualifications Framework and is listed on [training.gov.au](https://training.gov.au).

**National Register:** The authoritative register of RTOs, training products, and accredited courses maintained on [training.gov.au](https://training.gov.au).

**Scope of Registration:** The list of training products the College is approved to deliver and assess, as published on the National Register.

**Third Party:** Any individual or organisation (other than an employee or contractor of Ella Bache College that provides services on behalf of the College, including marketing, recruitment, training, or assessment services.

### Training Product

A qualification, accredited course, skill set, or unit of competency from a nationally endorsed training package or an accredited course.

### VET Student Loans / Government Subsidy

Any financial assistance or subsidy provided to a student through a Commonwealth, State, or Territory government scheme to offset tuition or training costs.

## 6. Responsibilities

The following roles are responsible for ensuring compliance with this policy and procedure:

### Chief Executive Officer (CEO)

Holds overall accountability for ensuring that all public information and marketing activities meet legislative and regulatory requirements. Approves final versions of strategic marketing and recruitment campaigns.

## College Operations Manager

Oversees the implementation of this policy, conducts periodic reviews of marketing materials for compliance, and ensures that relevant staff and third parties understand and apply the requirements. Ensures internal audit coverage of this area is scheduled and acted upon.

## Marketing and Communications Staff

Responsible for the accurate creation, review, and approval of all public-facing content, including digital, print, social media, and verbal representations. Ensures that all advertising materials use correct training product codes, titles, and scope references. Submits materials for compliance approval prior to distribution.

## Trainers and Assessors

Must ensure any verbal or written information provided to prospective students is consistent with approved marketing content and does not include unauthorised guarantees or representations.

## Third Parties / Education Agents / External Experts

Must comply with this policy when delivering any marketing or recruitment services on behalf of Ella Bache College, including adherence to scope of registration, fee disclosure requirements, and accurate product information. These expectations must be formalised through written agreements and actively monitored.

## All Staff

Have a duty to report any concerns or observed non-compliance with marketing standards or public representations to the College Operations Manager immediately.

## 7. Legislative and Regulatory Requirements

This policy aligns with the following regulatory instruments:

- Compliance Requirements for RTOs 2025 Part 2 – Division 1 – Information and Transparency 7 Marketing and Advertising 8 Guarantees and Inducements, Division 2
  - Integrity of Nationally Recognised Training Products 13 Nationally Recognised Training logo
- National Vocational Education and Training Regulator Act 2011
- Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010)
- VET Student Loans Act 2016 (where applicable)
- Guidelines on the Use of the NRT Logo (Schedule 4 of the Standards)

## 8. Procedure

Ella Bache College maintains a structured approach to the development, approval, publication, and monitoring of all marketing and public information to ensure compliance with regulatory requirements and the Standards for RTOs 2025. All advertising, promotional

activities, and information provided to students or the public must be reviewed for accuracy, authorised prior to release, and monitored regularly for ongoing compliance.

## 1. Development of Marketing and Information Materials

All marketing materials, course brochures, web content, advertising campaigns, and public announcements are drafted by the Ella Bache Marketing Team. Materials must:

- Clearly identify Ella Bache College's name and registration number, or include a hyperlink to the National Register;
- Accurately state the full and correct code and title of each training product as published on training.gov.au;
- All advertised training products must be verified against the College's current scope of registration on training.gov.au prior to approval;
- Clearly differentiate nationally recognised training from non-accredited offerings;
- Accurately represent entry requirements, fees, funding/subsidy eligibility (if applicable), course structure, duration, and assessment requirements;
- All marketing must disclose the total expected volume of learning and clearly differentiate it from assessment-only time. This includes indicative hours of supervised training and unsupervised study, where appropriate
- Include appropriate disclosures if a third party or external expert is involved in delivery or recruitment;
- Avoid false or misleading claims about employment outcomes, completion guarantees, or affiliations with other entities.
- Marketing of non-accredited programs must not use terms such as 'certificate', 'nationally recognised', or the NRT logo and must clearly indicate that the program is not nationally recognised.

## 2. Review and Approval Prior to Publication

All marketing and advertising content must be submitted to the College Operations Manager (or delegated staff member) for compliance review. The College Operations Manager ensures:

- The training product is on scope and correctly identified;
- Claims made are accurate, realistic, and evidence-based;
- All disclosures regarding third parties, government funding, and financial support are correctly included and must include required disclaimers as per funding body guidelines;
- The material complies with the Standards for RTOs 2025 and relevant legislation.

Materials cannot be published or distributed until approval is granted by the College Operations Manager.

## 3. Publication and Distribution

Once approved, marketing content may be published or released via the intended channels (e.g., website, email, print, social media). All staff must use only the most recent approved

versions of promotional materials. Superseded materials must be removed from circulation and archived in accordance with the document control policy.

## 4. Monitoring and Ongoing Compliance

The College Operations Manager maintains a Marketing and Information Compliance Register, which logs:

- The type and date of each marketing material developed;
- The training products referenced;
- Approval sign-off and date;
- Review date and expiry/removal date.

Regular checks are conducted to ensure current advertising remains compliant. This includes audits of public-facing content (e.g., website, social platforms, flyers in use) and random sampling of student-facing discussions to confirm verbal information is accurate and consistent with approved messaging.

Where non-compliant marketing is identified, immediate corrective action is taken. This may include withdrawing the material, issuing a retraction or clarification, and notifying relevant regulatory authorities if required.

## 5. Third Party Monitoring

Third parties involved in marketing or recruitment must be under a formal written agreement with Ella Bache College that sets out their obligations under this policy. Their activities are monitored through:

- Review of published or distributed materials;
- Mystery shopping or spot-checks;
- Student feedback and complaints;
- Annual third-party compliance reviews.

Breaches of these arrangements may result in sanctions, retraining, or termination of the agreement.

## 6. Continuous Improvement

Feedback received from staff, students, or industry regarding the clarity, transparency, or accuracy of published information is documented and analysed. Any confirmed issues are addressed through the Continuous Improvement Register and used to enhance future versions of the policy and procedures.

## Procedure Summary Table

Step & Action	Responsible	Timeframe	Reference / Use
<b>1. Draft marketing, advertising, and public information materials</b>	Marketing Staff / Authorised Third Party	As required	Draft templates, Training.gov.au product titles
<b>2. Confirm training product codes and titles are current and on scope</b>	College Operations Manager	At time of material development	National Register (TGA), Scope of Registration
<b>3. Submit materials for compliance review</b>	Marketing Staff	Prior to any publication	Marketing Compliance Checklist
<b>4. Review and approve accuracy, scope, funding statements, and third-party disclosures</b>	College Operations Manager	Within 5 business days	Internal Approval Record
<b>5. Publish or release only approved materials</b>	Marketing Team / Authorised Third Party	Upon approval	Version-controlled materials repository
<b>6. Archive or remove superseded materials</b>	Marketing Staff / Admin	Immediately after update	Document Control Policy
<b>7. Log marketing item in Compliance Register</b>	College Operations Manager	Within 2 business days of release	Marketing and Information Compliance Register
<b>8. Conduct regular spot-checks and compliance reviews of all published information</b>	College Operations Manager	Quarterly	Internal Audit Schedule, Website Review Log
<b>9. Monitor third-party marketing and student feedback</b>	College Operations Manager	Ongoing	Third Party Register, Complaints Register
<b>10. Take corrective action if non-compliance is identified</b>	College Operations Manager	Within 2 business days	Continuous Improvement Register, Communications Log
<b>11. Record evaluation outcomes and incorporate improvements</b>	College Operations Manager	As part of CI cycle	Continuous Improvement Register, Policy Review Log

## 9. Policy Implementation

This policy is implemented through centralised coordination of marketing activities by the College Operations Manager, and the Ella Bache Marketing Team supported by clear templates, approval workflows, and documented procedures. All marketing staff, agents, and third-party providers are inducted into the requirements under this policy, and compliance is monitored via approval logs and scheduled audits. Course developers and trainers ensure

alignment between advertised content and actual course delivery, with updates cascaded through content review cycles.

## 10. Monitoring and Evaluation

Compliance with this policy is monitored through:

- Regular internal audits of promotional materials and digital content;
- Spot-checks of third-party advertisements and website references;
- Annual reviews by the College Operations Manager and Marketing Manager;
- Tracking corrective actions through the Continuous Improvement Register;
- Feedback from students, industry, and regulatory bodies.

All incidents of non-compliance are recorded and trigger a review of processes or additional staff training where required.

### *Document Control*

<b>Document Title</b>	<b>Marketing and Advertising Policy and Procedure</b>		
<b>Approved By</b>	Pippa Hallas CEO		
<b>Date Approved</b>	04/07/2025		
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<b>Standards/Legislation</b>	Standards for RTOs 2025, VET Student Loans		
<b>Version</b>	1		
<b>Version Number</b>	Changes	Approval By	Approval Date
1.0	Initial version	CEO	04/07/2025

### **Associated Documents**

#### **Policies**

Fees and Refund Policy

Student Information and Marketing Policy and Procedure

#### **Forms and Templates**

Course Guide Template

Continuous Improvement Register

Marketing and Information Compliance Register

Marketing Submission Form

Student Handbook

Social Media Guidelines

Third Party Marketing Agreement

Website Management Checklist