

Advertising and Marketing Policy and Procedure

Approving body	Governing Board
Date approved	21 Nov 2024
Date of effect	Commencement of Operation
Next scheduled review	Two years from policy commencement
Policy owner	Chief Executive Officer
Policy contact	Chief Executive Officer
Related Documents	Education Agent Policy and Procedure Records and Data Management Policy and Procedure
Higher Education Standards Framework (HESF) 2021 (Cth)	Section 7.1 Section 7.2 National Code

Purpose

1. This Policy sets **Zenith Innovation Institute (Zenith / the Institute)** approach to ensure the provision of quality information to prospective students and the broader community.
2. The Institute is committed to providing accurate, current and easily accessible information to its students (prospective and current) and community. Publicly available information is developed for effective engagement with students and the broader community and covers key aspects of the Institute's operations and services.

Scope

3. This Policy applies to:
 - (a) members of the Institute's governing bodies;
 - (b) all staff of the Institute whether full-time, part-time, casual or contract; and
 - (c) individuals engaged in providing services to the Institute or receiving services from the Institute, such as students, agents, contractors, third-party delivery partners or consultants.

Policy

Principles

4. The Institute will ensure that information about the Institute, its courses, fees and professional accreditation status where relevant:
 - (a) Is current, comprehensive and accurate;
 - (b) is available to prospective students prior to acceptance of an offer, written in plain English and includes explanations of any technical or specialised terms;
 - (c) Is comprehensive and contains, as a minimum, information required by the *Higher Education Standards Framework (Threshold Standards) 2021 (HESF)*. Refer Appendix 1 excerpt of Domain 7; and
 - (d) Factually accurate and consistent with the requirements of the *National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code)* and Australian Consumer Law. An excerpt of the National Code is attached to this document as Appendix 2.

Representation and information

5. Public information, including any information used by Zenith's education agents, should provide an accurate representation of the Institute, its educational offerings, associated fees, accreditation of courses by TEQSA and professional accreditations.
6. Information for supporting students' choice to study at the Institute should be accurate, relevant, timely, easily and publicly accessible on the Institute's website. Where any change to the Institute's operations could reasonably be expected to have an impact on a person's choice to study at the Institute, such as a change in tuition fees, notice is given sufficiently in advance to enable informed decision-making.
7. Mechanisms to assure the quality and accuracy of Institute information provided by agents to prospective students are outlined in the *Education Agent Policy and Procedure*.

Procedure

Release of public information

8. The Institute implements the following process for assuring the quality of public information for release on its website or marketing materials:
 - (a) **Approach:** Institute staff adopt a student-centric approach to the identification of information requirements. The information provided must primarily support and enable prospective and current students to make informed choices;
 - (b) **Planning:** The Marketing and Student Recruitment Officer maintains an annual schedule of public information to be released, including due dates and responsible officers. The Marketing and Student Recruitment Officer monitors completion of required information against the schedule and reports on progress to the Chief Executive Officer (**CEO**) through the Executive Management Team;
 - (c) **Drafting:** Institute staff responsible for drafting public information should ensure that all applicable legislative, regulatory or legal requirements are addressed including HESF requirements for information covering:

- (i) **courses** or units of study, including the course design, prerequisites, assumed knowledge, when and where courses/units are offered, application dates, arrangements for recognition of prior learning, standing credit transfer arrangements, pathways to employment and eligibility for registration to practise where applicable;
- (ii) **orientation and induction**, delivery arrangements, technical requirements for access to IT systems for online activities, timetables, access to learning resources, avenues to participate in decision-making and opportunities to participate in student representative bodies;
- (iii) **standards of behaviour** expected from students, financial obligations to the Institute, critical deadlines, policies for deferral, change of preference/enrolment and leave of absence, disciplinary procedures, misconduct and grounds for suspension or exclusion;
- (iv) **academic governance policies and requirements** including admission, recognition of prior learning, transition, progression, assessment, grading, completion, qualifications, appeals, academic integrity, equity and diversity, intellectual property and withdrawal from or cancellation of enrolment;
- (v) **services available** such as academic and personal support services, hours of availability, how to access services and emergency contact details as Zenith as well as services external to Zenith, including any costs involved;
- (vi) **processes for grievances** and complaints resolution, and internal and external appeals processes, guidance on how to participate in the processes and sources of assistance including advocacy; and
- (vii) **professional accreditation and course accreditation** held with industry groups or associations, such as TEQSA, CRICOS and ACS;

(d) **Verification:** Responsible officers must ensure that the information is verified prior to seeking authorisation for release. Where possible, verification should be undertaken by another staff or business unit with adequate knowledge of applicable legislative, regulatory and legal requirements. Information to be provided to international students must be developed and reviewed by staff members with close knowledge of the *Education Services for Overseas Students Act 2000* (Cth) and *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (Cth) and the HESF;

(e) **Authorisation:** Any release of public information, and any material change to public information, must be authorised by the CEO. The CEO must confirm that all required internal approvals, e.g. from the Governing Board (GB), or external approvals, (e.g. TEQSA in the case of course accreditation), have been obtained prior to release of the information;

(f) **Publication:** The Marketing and Student Recruitment Officer ensures that any information authorised for release is published in a timely manner and notifies all relevant Institute staff, students, education agents (if applicable), or other impacted stakeholders of the release; and

(g) **Recording:** The Marketing and Student Recruitment Officer ensures that a record of any published information is kept for at least two years in accordance with the Institute's *Records and Data Management Policy and Procedure*.

Monitoring and improvement

9. Responsible officers must ensure that published information is regularly reviewed to ensure it remains accurate, relevant and fit for purpose. The Marketing and Student Recruitment Officer

will notify responsible officers of any feedback received from students and stakeholders. A review of the Institute's public information must be conducted after course reviews or material organisational change including changes to policy or fees and charges.

10. The Institute collects data on the quality of the information published on the website and marketing materials. Student and stakeholder feedback views and experience is sought on the Institute's public information, including website and marketing materials.
11. The Institute uses the collected data to monitor trends in stakeholder and student satisfaction.
12. The Institute will seek to improve this Policy and associated processes and procedures based on the collected data, in particular its impact on prospective students' ability to make informed decisions on the Institute's educational offerings.
13. The Institute will benchmark its performance against relevant industry data and will establish targets as appropriate.
14. The GB receives an annual report on the adequacy and effectiveness of strategies for the representation of the Institute and the release of public information.

Responsibilities

15. The GB is responsible for ensuring that the Institute has effective processes for the timely release of public information.
16. The CEO is responsible for:
 - (a) ensuring that internal and external approvals have been received prior to release; and
 - (b) authorising the release of public information.
17. The Marketing and Student Recruitment Officer is responsible for:
 - (a) the overall quality of the Institute's public-facing information and its compliance with relevant legislation, codes and standards;
 - (b) training and monitoring education agents associated with the Institute for compliance with representation requirements as outlined in the *Education Agents Policy*; and
 - (c) publishing information on the Institute's website and other marketing materials.
18. Responsible officers are responsible for:
 - (a) drafting public information based on all applicable legislative, regulatory and legal requirements; and
 - (b) verifying the quality of public information prior to release.

Definitions

19. For the purposes of this Policy:

Term	Definition
Representation	The presentation of a provider, the services it provides, and other related aspects of its operations as factual and truthful.
Public information	Any information made publicly available by the Institute on its website and marketing material such as brochures and prospectuses (in any form).

Version Control

Version	Changes	Approval Body	Approval Date
1.0	Original Version	Governing Board	
1.1	Point 8, viii changed “CPA Australia” to ACS		21 November 2024

Appendix 1 – HESF Domain 7

1. Representation, Information and Information Management

1.1 Representation

- (a) Representation of the higher education provider, its educational offerings and charges, whether directly or through agents or other parties, is accurate and not misleading.
- (b) Courses or units of study that are offered or intended to be offered are not described as accredited, whether by TEQSA or by a professional accreditation body for the purposes of registration to practise, until such accreditation has been obtained.
- (c) Where units of study are offered separately from a course of study and are represented as eligible for gaining credit towards a course of study or a qualification:
 - (i) the course(s) of study and qualification(s) for which credit may be gained are specified; and
 - (ii) the terms on which credit may be granted are defined.
- (d) Agents and other parties that are involved in representing the higher education provider are bound by formal contracts with the provider, their performance is monitored and prompt corrective action is taken in the event or likelihood of misrepresentation or unethical conduct.
- (e) Representations, whether expressed or implied, about the outcomes associated with undertaking a course of study, eligibility for acceptance into another course of study, employment outcomes or possible migration outcomes are not false or misleading.

1.2 Information for Prospective and Current Students

- (a) Accurate, relevant and timely information for students is publicly available and accessible, including access for students with special needs, to enable informed decision making about educational offerings and experiences.
- (b) Information for students is available prior to acceptance of an offer, written in plain English where practicable, accompanied by an explanation of any technical or specialised terms, and includes:
 - (i) information to assist in decisions about courses or units of study, including the course design, prerequisites, assumed knowledge, when and where courses/units are offered, application dates, arrangements for recognition of prior learning, standing credit transfer arrangements, pathways to employment and eligibility for registration to practise where applicable;
 - (ii) information to assist in planning for and participation in educational and other activities, including contact points, advice about orientation and induction, delivery arrangements, technical requirements for access to IT systems for online activities, timetables, access to learning resources, avenues to participate in decision making and opportunities to participate in student representative bodies;
 - (iii) information to outline the obligations of students and their liabilities to the higher education provider including expected standards of behaviour, financial obligations to the higher education provider, critical deadlines, policies for deferral, change of preference/enrolment and leave of absence, particular obligations of international students, disciplinary procedures, misconduct and grounds for suspension or exclusion;

- (iv) information to give access to current academic governance policies and requirements including admission, recognition of prior learning, transition, progression, assessment, grading, completion, qualifications, appeals, academic integrity, equity and diversity, intellectual property and withdrawal from or cancellation of enrolment;
- (v) information to facilitate access to services and support including the types of services available such as educational resources including English language support, personal support services, cultural support and ancillary services, hours of availability, how to access services and emergency contact details where applicable;
- (vi) information to assist in resolution of grievances, including an explanation of processes for resolution of grievances and complaints and internal and external appeals processes, guidance on how to participate in the processes and sources of assistance including advocacy; and
- (vii) information to assist international students studying in Australia if applicable, including indicative costs of living and studying in Australia, accommodation options, arrangements for health care and, where applicable, schooling obligations related to school-aged dependants (including the possibility that school fees may be incurred).
- (c) There are policies and processes that ensure information and advice given to international students holding or applying for an Australian student visa and decisions taken in relation to such students meet statutory requirements.
- (d) Students are given reasonable notice of changes to a higher education provider's operations including information about increases in fees and associated costs and any consequences that may affect their choice of, or ability to participate in, an intended course(s) of study.

1.3 Information Management

- (a) There is a repository of publicly-available current information about the higher education provider's operations that includes:
 - (i) the registered name of the higher education provider, trading name(s) if different, regulatory status and authority to provide courses of study to international students studying on an Australian student visa;
 - (ii) the instrument establishing the entity;
 - (iii) the members of the governing body and senior executive;
 - (iv) the financial standing of the provider;
 - (v) indicative total student enrolments;
 - (vi) a high-level organisational chart that includes the organisational units that deliver courses of study, such as schools or faculties;
 - (vii) the locations at which higher education is offered, including overseas if applicable;
 - (viii) an overview of teaching campuses, facilities, learning resources and services provided for students;
 - (ix) a list of all higher education courses of study that are offered, including indicative estimated annual enrolments;
 - (x) arrangements with other parties to deliver courses of study or to conduct research training;

- (xi) where public annual reports are required of the provider, the three most recent annual reports;
- (xii) how to lodge a complaint about the higher education provider; and
- (xiii) contact details.

(b) The list of all higher education courses of study within the repository of information includes:

- (i) the accreditation status of each course of study;
- (ii) the qualification(s) offered;
- (iii) whether the qualification is recognised in the Australian Qualifications Framework;
- (iv) confirmation of recognition of each course of study by the relevant professional body(ies) if such recognition is required for registration of graduates to practise;
- (v) whether each course of study is authorised to be offered to international students studying on an Australian student visa;
- (vi) the duration of each course of study; and
- (vii) details of the credit and recognition of prior learning policy that applies to each course of study and direction on how to obtain information on any articulation or credit arrangements that may apply to the course.

(c) Information systems and records are maintained, securely and confidentially as necessary to:

- (i) maintain accurate and up-to-date records of enrolments, progression, completions and award of qualifications;
- (ii) prevent unauthorised or fraudulent access to private or sensitive information, including information where unauthorised access may compromise academic or research integrity;
- (iii) document and record responses to formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents; and
- (iv) demonstrate compliance with the Higher Education Standards Framework.

Appendix 2 – National Code for Practice for Providers of Education and Training to Overseas Students 2018: Standard 1

Part B – Standards for Providers of Education and Training to Overseas Students Standard 1

1. Marketing information and practices

- (a) The registered provider must ensure that the marketing and promotion of its courses and education services in connection with the recruitment of overseas students or intending overseas students, including through an education agent (in accordance with Standard 4), is not false or misleading, and is consistent with Australian Consumer Law.
- (b) The registered provider must, in seeking to enter into written agreements with overseas students or intending overseas students, not provide any false or misleading information on:
 - (i) its association with any other persons or organisations the registered provider has arrangements with for the delivery of the course in which the student intends to enrol or may apply to enrol;
 - (ii) any work-based training a student is required to undertake as part of the course;
 - (iii) prerequisites – including English language proficiency – for entry to the course; and
 - (iv) any other information relevant to the registered provider, its courses or outcomes associated with those courses.
- (c) The registered provider must not:
 - (i) claim to commit to secure for, or on the student or intending student's behalf, a migration outcome from undertaking any course offered by the registered provider; and
 - (ii) guarantee a successful education assessment outcome for the student or intending student.
- (d) The registered provider must include its CRICOS registered name and registration number in any written or online material that it disseminates or makes publicly available for the purposes of:
 - (i) providing or offering to provide a course to an overseas student;
 - (ii) inviting a student to undertake or apply for a course; or
 - (iii) indicating it is able or willing to provide a course to overseas students.
- (e) The registered provider must not actively recruit a student where this conflicts with its obligations under Standard 7 (Overseas student transfers).