



Subject: **MARKETING INFORMATION PRACTICES POLICY AND PROCEDURE**
Covers: **MARKETING AND PROMOTION OF THE SCHOOL, ITS COURSES AND EDUCATION SERVICES**

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National ESOS Code: Applicable to – Standard 1 (also relates to Standard 4 and Standard 7)
CRICOS Code: 00482K

Marketing Information Practices Policy and Procedure

St Michael's Collegiate School must ensure our marketing is always conducted in a professional, accurate and ethical manner ensuring the integrity and reputation of the international education industry in Australia.

St Michael's Collegiate School will ensure that all promotion of the School, its courses and education services will not be false or misleading and will be consistent with Australian Consumer Law. The Australian Consumer Law is existing legislation administered by the Australian Competition and Consumer Commission. It is our responsibility as a Provider to comply with the Australian Consumer Law.

When St Michael's Collegiate School seeks to enter into written agreements with overseas students, as a registered provider or in recruiting of overseas students the School must not give false or misleading information on:

- any work-based training an overseas student is required to undertake as part of the course;
- prerequisites for entry to the course (including English language); or
- any other information relevant to St Michael's Collegiate School as a registered provider and/or the School's registered courses and the
- outcomes associated with those courses.

As a registered provider St Michael's Collegiate School will not promise overseas students any possible migration outcomes from undertaking any courses - or guarantee successful education assessment outcomes for the overseas or intending overseas student.

St Michael's Collegiate School's Provider CRICOS code and full legal entity name, must be clearly displayed at campuses/sites and on all written and marketing material for international students including electronic media that is used for the purpose of marketing/corresponding with international students. As documented in our procedure, we have a process for reviewing and approving changes to our marketing material. All marketing material and policies will have version control. Email trails of approvals for amendments to marketing materials or creation of new marketing materials are retained.

St Michael's Collegiate School will not provide students with any false or misleading information or advice as prescribed in The National Code Standard 1 and St Michael's Collegiate School will not actively be recruiting international students where this conflicts with obligations under Standard 7 (Overseas Student Transfers). Checks will be made by St Michael's Collegiate School (under our procedures of implementing this policy) to ensure that a student is not being offered a place by an agent on the basis that they should transfer to St Michael's Collegiate School due to the course being superior or cheaper with the intention being to encourage the student to transfer to another school i.e., St Michael's Collegiate School. In addition, in the event a student / family contacts the school directly, procedures are in place to take all reasonable steps to check whether the student is already enrolled with another Provider.

St Michael's Collegiate School will also monitor those representing Collegiate i.e., education agents and consultants appointed to present information about Collegiate. Agents representing the school are checked initially for their integrity and understanding of Collegiate procedures and knowledge of the school. Once satisfied of their compliance and pending a trial period to ensure ethical behaviour as well as training provided to the agency about Collegiate, the agency may only then be issued an agency agreement (as per the policy requirement of Standard 4-Education Agents).

St Michael's Collegiate School will inform students of the modes of study through which the course may be offered as per the course marketing material. Any changes will be advised in writing to students and signed off by students or parents.

Any arrangements St Michael's Collegiate School has entered into or may enter into in the future with another provider, will also include our full legal entity and CRICOS number and a cooperative brochure forms part of the marketing collateral provided at the time of marketing the School's courses which involve another provider.

As per Standard 7 St Michael's Collegiate School acknowledges international students are now restricted from transferring until they have completed the first 6 months of the first registered school course of the student's enrolment, unless the transfer reason meets an exception under Standard 7. All requirements of Standard 7 will be adhered to by St Michael's Collegiate School.

St Michael's Collegiate School or its agents will not engage in the recruitment/poaching of students enrolled with other providers. Education Agents are monitored as per our 'Education Agents' Policy and Procedure as per Standard 4.

Procedure

St Michael's Collegiate School's Deputy Principal monitors all marketing materials and website information to be uploaded to promote the school and checks to ensure the information displays the CRICOS Provider number and as relevant course codes, as per this Standard 1 of the National Code.

Approval will be signed off by the Deputy Principal or Chief Operating Officer prior to any online information or printed materials being created.

All policies, marketing materials and documentation relevant to marketing the School, as applicable, will include version control.

Staff will receive notice of any changes being required to electronic email signatures or electronic media as applicable from the Deputy Principal's delegate following approval by Deputy Principal as above.

St Michael's Collegiate staff have all been provided a brief regarding marketing requirements and advised that at any time should they be unsure about any CRICOS related requirements for any printed or online material or communications medium, check first with the Deputy Principal.

Staff are advised that no changes to marketing material, as prescribed in Standard 1 of the National Code, are to be made without prior approval by Deputy Principal, as this could put our CRICOS registration at risk.

NO students from another provider can be enrolled unless Standard 7 of the National Code has been followed (refer St Michael's Collegiate School's - *Overseas Student Transfers Policy*). This policy and procedure must be followed in recruiting overseas students.

PRIOR to St Michael's Collegiate School entering into a new arrangement with another provider CRICOS approval is to be sought via the appropriate form with the designated authority.

NO member of staff/agent or in the case of consultants working for the School, are to engage in the recruitment/poaching of students from other providers.

Students enrolled from other providers will be asked why they seek a transfer to St Michael's Collegiate School and how they found out about St Michael's Collegiate School. Any inference of poaching or misrepresentation in terms of 'encouraging a student to switch schools' will be fully investigated by the Director of International Enrolments in liaison with Chief Operating Officer and Principal, and appropriate action taken. All students which are identified as being a student wishing to transfer into St Michael's Collegiate School will be considered only under compliance with Standard 7.

Any concerns about our Education Agents are to be dealt with as per our "*Education Agents' Policy and Procedure* under Standard 4.

Samples of course marketing material are available in the School Prospectus and on the St Michael's Collegiate School website. There are numerous handbooks relating to courses, care, boarding, specialised programs and so on. Should St Michael's Collegiate School offer to a student a course which may include a subject being delivered by another provider, the school has a co-operative agreement with that provider and this will be provided to clarify the delivery of the course between providers.