

# International Marketing Policy

April 2022 - This document is rescinded and is replaced by the [Communications and Marketing Policy](#) and [Communications and Marketing Procedure - Marketing and Advertising](#).

## Section 1 - Purpose

(1) The purpose of this policy is to ensure that Charles Sturt University (the University) maintains a coordinated response to international marketing and presents a consistent, consolidated and coordinated public image in the international market that complies with relevant acts and regulations. It outlines the responsibility of various parties in relation to international marketing and ensures that all operations and activities are conducted in a way that ensures the University meets its legal obligations.

### Scope

(2) This policy covers marketing the University internationally, to both prospective students who will study in Australia on a student visa and those who will study offshore (including online). This policy is the overall responsibility of the Office of Global Engagement and Partnerships (OGEP). In meeting this responsibility, OGEP aims to work collaboratively with other areas of the University and external stakeholders to develop a strong and integrated approach to international marketing, in line with the strategic direction of the University and with government and industry regulations (including the ESOS Act, National Code, [Higher Education Standards Framework](#) and Australian Consumer Law).

## Section 2 - Glossary

(3) For the purpose of this Policy:

- a. Articulation pathways - means courses provided by institutions, located in Australia or overseas, with which the University has an agreement to give a certain amount of credit into a University degree, enabling students to articulate to University programs and reduce the number of subjects they need to complete.
- b. Australian Consumer Law - means [Competition and Consumer Act 2010](#) (Cth), as amended.
- c. CRICOS - means the Commonwealth Register of Institutions and Courses for Overseas Students, the register of all education providers with courses offered to international students studying on a student visa.
- d. DOMC - means the Division of Marketing and Communications.
- e. ESOS Act - means the [Education Services for Overseas Students Act 2000](#) (Cth), as amended.
- f. HESF - means the [Higher Education Standards Framework \(Threshold Standards\) 2015](#) (Cth), as amended.
- g. International Education Agent - means an organisation engaged by the University via a formal agreement to undertake approved international student recruitment activities on behalf of the University, where they are paid a commission for a successful placement
- h. National Code - means the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#) (Cth), as amended.
- i. OGEP - means the Office of Global Engagement and Partnerships.
- j. Partners - means third-party institutions that are contracted to deliver University programs in Australia or

overseas.

## Section 3 - Policy

### Marketing information and practices

(4) The Australian Government wants international students in Australia to have a safe, enjoyable and rewarding place to study. Australia's laws promote quality education and consumer protection for overseas students. These laws include the:

- a. [ESOS Act](#)
- b. [National Code](#)

(5) The University must also abide by the:

- a. [HESF](#)
- b. Australian Consumer Law
- c. in-country regulations relevant to the recruitment or marketing of prospective students.

(6) The University will ensure that the marketing of its education and training services is accurate and ethical, and maintains the integrity and reputation of the higher education industry.

### Clear identification of the University

(7) Standard 1 of the National Code requires the clear identification of the University's name and CRICOS provider number on all University stationery and in written marketing material and other material that may be viewed by international students, including electronic form. The University's name and CRICOS provider number must be included in the footer of the website and on all marketing materials intended for international students.

(8) Each course offered in Australia must have its own course CRICOS code before it can be advertised to international students who intend to study on a student visa. Course CRICOS codes must be published in marketing material, including the University website.

### International marketing material

(9) Office of Global Engagement and Partnerships (OGEP) will produce international marketing communications that are market sensitive and compliant with the ESOS Act, National Code, [HESF](#), Australian Consumer Law, and any in-country regulations. Marketing materials must pass through the appropriate workflow approval to ensure they are compliant and contain up-to-date information.

(10) All electronic and printed marketing materials, including websites and advertisements, must not contain false or misleading information or advice in relation to:

- a. claims of association between the University and other providers;
- b. the employment outcomes associated with a course;
- c. guaranteed acceptance into another course;
- d. possible migration outcomes; or
- e. any other claims relating to the University, the University's courses or outcomes associated with University courses.

## **Responsibilities in relation to marketing information and practices**

(11) The responsibility for international marketing information and practices at the University is shared. While all staff have a role to play in marketing the University, specific responsibility resides with a number of areas:

(12) OGEP is responsible for:

- a. supporting faculties to identify, develop and manage appropriate relationships and articulation pathways;
- b. the collection, coordination, collation and dissemination of up-to-date market research provided by government or independent organisations and bodies, current customers and alumni in order to support faculty or divisional initiatives in relation to international student recruitment and, where possible, benchmarking the University against like institutions and reporting on significant trends;
- c. supporting the compliance of all marketing materials and activities conducted by DOMC in accordance with the ESOS Act, National Code, [HESF](#), Australian Consumer Law and in-country regulations, to ensure the University is represented in a professional manner, maintaining the integrity and reputation of the Australian higher education industry;
- d. the planning, development and distribution of international marketing materials as requested, and maintaining an inventory of stock quantities; and
- e. providing up-to-date marketing materials to staff travelling overseas or staff marketing to international students.

(13) Division of Marketing and Communication (DOMC) is responsible for:

- a. the overall management of the University's brand and reputation;
- b. keeping a register of materials produced by the Studio and storing samples of promotional material used to market and recruit students to the University in the University's records management system;
- c. participating in the process for signing off promotional material and providing evidence of updating materials when necessary;
- d. enquiry management of prospective international students and agents through the Sales Contact Centre; and
- e. overseeing the ethical and accurate advertising of media in Australia and overseas, in conjunction with OGEP subject matter experts.

## **Partners**

(14) The University has a number of contractual arrangements with institutions in Australia and overseas who deliver University courses. While the responsibility for recruitment resides with the partner, these arrangements require marketing support and governance in relation to the use of University's name and logo and compliance of marketing materials with the ESOS Act, National Code, [HESF](#), Australian Consumer Law and in-country regulations.

## **Responsibilities in relation to partners**

(15) While partners are responsible for recruitment into their programs, OGEP is responsible for:

- a. the quality assurance of marketing activities undertaken by these providers;
- b. working closely with the faculties to identify, develop and manage partnerships, including course delivery programs;
- c. guiding and approving any annual marketing and recruitment activities/plans;
- d. providing University course brochures, application forms and other marketing materials as required;
- e. ensuring University programs or approved courses are marketed with integrity and accuracy and ensure any activities are conducted in accordance with applicable regulations in Australia and in their country including:

- i. ESOS Act
- ii. National Code of Practice
- iii. [HESE](#)
- iv. Australian Consumer Law

- f. providing the necessary support to University staff travelling overseas on University business through the provision of training, advice and appropriate marketing materials;
- g. providing University staff, where necessary and appropriate, to attend admissions exercises, careers fairs, interviews and other activities;
- h. maintaining ongoing relationships with the marketing staff of Education Provider institutions to ensure options for international study are maximised at both institutions; and
- i. approval of all marketing materials before distribution.

(16) DOMC is responsible for:

- a. providing approval for the use of logo and any material developed to promote University programs, in accordance with the University's brand usage guidelines.

(17) Partners are responsible for:

- a. ongoing marketing and recruitment for these programs; and
- b. establishing and maintaining compliance with all requirements.

## **On campus in Australia and online learning study**

(18) The University recruits students from various countries to study on campus and by online learning. OGEP is responsible for the development of marketing strategies for the recruitment of international students to its on-campus and online learning courses through:

- a. international education agents;
- b. exhibitions and events; and
- c. online.

(19) OGEP supports the faculties in the recruitment of students from partners or through articulation pathways. OGEP also works with faculties to support international and industry relationships.

(20) OGEP works with the faculties to develop marketing priorities and initiatives. The focus is on countries where the University has existing brand leverage; however, activity still occurs in other countries.

## **International education agents**

(21) The University engages international education agents to recruit to on-campus and online learning programs. The role of the agent is to submit a student's application to the University and guide the student through the application process. The agent is also responsible for providing the student with accurate and comprehensive information, and ensuring the required and verified documents are attached to the application. The agent recruiting for on-campus study will also assist the international student with their visa application to the Australian Government.

(22) The University must enter into a written agreement with each education agent it engages to formally represent it. At this stage, the agent becomes an international education agent of the University.

(23) International education agents must be engaged and managed in accordance with the [International Education Agent Policy](#).

## **Exhibitions and events**

(24) International student exhibitions are displays that occur throughout the year in a number of key markets in Australia and overseas, hosted and supported by international education agents, Austrade or other agencies, organisations or governments.

(25) OGEP will review any opportunity to attend exhibition and events that are deemed relevant and valuable. Approval to participate in such exhibitions is required and should be sought from the Director, Global Engagement or delegate.

## **Online**

(26) OGEP has responsibility for the promotion of international courses and study opportunities via the [University website](#) and social media.

(27) All material posted on the University website must be reviewed regularly to ensure compliance with the following:

- a. ESOS Act
- b. National Code of Practice
- c. [HESF](#)
- d. Australian Consumer Law.

## **Partners and articulation pathways**

(28) OGEP will also, where possible, promote opportunities to study in Australia to university students currently studying through contracted education providers or to students currently studying with articulation partners. This involves:

- a. the development of marketing materials to support and promote pathways;
- b. support for visiting academics; and
- c. the quality assurance of articulation partner activities.

## **Responsibilities in relation to on-campus in Australia or online learning study**

(29) OGEP is responsible for:

- a. the development and implementation of strategies aimed at increasing the number of international students studying on campus in Australia and by online learning. This is achieved by:
  - i. working with the faculties to provide on-campus study opportunities to students currently enrolled in transnational education programs, and
  - ii. working with the faculties, schools and course coordinators to develop strategies for the markets in which they are, or seek to be, active;
- b. supporting the faculties in their articulation arrangements and other faculty initiatives by providing staff with the relevant marketing for on-campus and online learning study, arranging appointments with key recruitment agencies and assisting with the provision of marketing presentations where possible;
- c. undertaking due diligence on prospective partners and actively seeking new opportunities in this area;
- d. the recruitment of international agents, including training, due diligence checks and the oversight of the University's agent management strategy, ensuring agents are recruiting for the University according to the ESOS Act, National Code and [HESF](#); and
- e. the quality assurance of marketing activities undertaken by agents and supporting them with hard copy marketing material and other marketing support.

(30) Staff travelling overseas on University business are encouraged to make contact with OGEP at least two months prior to their trip to discuss marketing support. Staff are encouraged to take the time to go through the staff information pack developed by OGEP.

## **Section 4 - Procedures**

(31) Nil.

## **Section 5 - Guidelines**

(32) Nil.

## Status and Details

<b>Status</b>	Historic
<b>Effective Date</b>	9th October 2020
<b>Review Date</b>	9th October 2023
<b>Approval Authority</b>	Deputy Vice-Chancellor (Research and Engagement)
<b>Approval Date</b>	8th October 2020
<b>Expiry Date</b>	5th April 2022
<b>Unit Head</b>	Thomas Burton Executive Director, Engagement and Enterprise
<b>Author</b>	Erin Miskelly
<b>Enquiries Contact</b>	Office of Global Engagement