Communications and Marketing Procedure - Marketing and Advertising

Section 1 - Purpose

(1) This procedure supports the Communications and Marketing Policy and sets out:

a. the University's minimum standards, risk management and assurance processes for marketing and advertising,
b. the responsibilities and processes for marketing and advertising to ensure compliance with:
    i. Education Services for Overseas Students Act 2000
    ii. National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code)
    iii. Higher Education Standards Framework (Threshold Standards) 2021 Domain 7
    iv. Competition and Consumer Act 2010
    v. Spam Act 2003
    vi. Privacy and Personal Information Protection Act 1998
    vii. in-country regulations relevant to the recruitment or marketing of prospective students
c. the processes for booking and approving marketing and advertising campaigns
d. the processes for creating promotional materials and publications.

Scope

(2) This procedure:

a. applies to all University staff, students, partner institutions and controlled entities
b. does not apply to advertising for staff recruitment purposes
c. does not apply to advertising for tenders and expressions of interest for procurement or building work.

Section 2 - Policy

(3) See the Communications and Marketing Policy.

Section 3 - Procedures

Part A - Advertising compliance and standards

Marketing and advertising authorities

(4) Authorities for marketing and advertising functions are stated in Part C of the Communications and Marketing Policy.

Risk management and quality assurance

(5) The Division of Customer Experience and the Office of Global Engagement will regularly assess compliance risks associated with advertising, marketing and promotion, in accordance with the Risk Management Policy and Compliance Management Procedure.

(6) The risk assessment will involve:

a. reviewing all legislative instruments in each country in which the University markets or advertises its product, services or offerings (including those identified in the University's compliance register)
b. identifying the University's specific obligations within each instrument and the risk likelihood and risk consequence of each
c. documenting processes to manage each obligation and updating as required the minimum standards in this procedure and any other mandatory requirements for materials produced by the University
d. identifying the staff responsible for monitoring and approving materials to ensure compliance with obligations at all times
e. reviewing processes for identifying and mitigating breaches (with particular regard to any provisions of relevant laws regarding mitigation)
f. disseminating these requirements and responsibilities to staff involved in advertising, marketing and promotion.

Minimum standards

(7) All University advertising, marketing and promotional materials must:

a. be accurate, complete, and compliant with the University's ethical standards as stated at clause 8 in this procedure
b. be compliant with legal requirements and codes of practice stated at clause 1b of this procedure
c. be compliant with the University Brand Guidelines and Editorial Style Guide
d. allow prospective and current students to readily access information required to realistically determine their prospects for acceptance into a course and to understand the obligations and liabilities that admission into a course will incur (including but not limited to admission prerequisites, English language proficiency, costs of study and workplace learning requirements)
e. not make false or misleading representations about employment outcomes, migration outcomes or eligibility for acceptance into another course as an outcome of admission into a course
f. subject to clause 7g, only promote courses that have been accredited or are approved for marketing 'subject to final approval' in accordance with course approval processes (see 'Marketing University courses' in this procedure)
g. promote only courses that have CRICOS registration to prospective international students intending to study onshore in Australia (see 'Marketing University courses' in this procedure)
h. clearly identify the University's CRICOS registered name and registration number on all University stationery, written or online marketing material and all other material that may be viewed by international students, including in the footer of websites
i. where advertising, marketing or promotions occur outside Australia, include a reference to the country(ies) or jurisdiction(s) for which the material has been prepared so that prospective users of the materials from outside those countries or jurisdictions will be fully informed about the context for which the materials have been produced
j. be approved in accordance with Delegation Schedule A - Governance and Legal and the Communications and Marketing Policy, and regularly reviewed for ongoing compliance with these standards.

(8) Charles Sturt University advertising, marketing and promotions will comply with the Competition and Consumer Act, the Australian Ad Standards Code of Ethics and other adopted ethical practices. All advertising, marketing and promotions will:

a. be complete, truthful and accurate, based on evidence that is verifiable and fairly presented, and will not be misleading or deceptive
b. avoid the use of 'fine print' and be designed to minimise possible misunderstanding by the consumer or encourage consumers to take a course of action unsuited to their needs
c. not contain misrepresentations that might cause damage to the business or goodwill of our competitors
d. conform to common standards of decency, having regard to both the target audience and the broader community
e. not contain statements or visuals that could have the effect of harming children or young people, either mentally, morally or physically
f. positively embrace the diversity of the Australian and international community
g. respect First Nations Australian's ways of being, knowing, and doing
h. promote a positive and accessible view of the University
i. promote safe and healthy lifestyles, and will not encourage actions that contravene the law or relevant standards of socially responsible behaviour
j. avoid the use of (without justification for educational or social purposes) fear, superstition or speculation to encourage action
k. only use genuine, verifiable and relevant testimonials
l. only portray or refer to individuals with their prior permission
m. respect the marks and brands of other organisations.

Part B - Marketing and promotion processes

Marketing University courses

(9) A University course will only be promoted for the purpose of taking applications once it has been approved in accordance with the Course and Subject Policy.

(10) Courses may be submitted for tertiary admission course information and University publications with a 'subject to final approval' note once the business case has been approved, as stated in the Course and Subject Procedure - Information and Representation. In such cases:

a. the Executive Leadership Team (ELT) must authorise the promotion of the course as part of the approval process for the new course business case
b. a course program code may be generated on the ELT's approval
c. when promoting the course, applications cannot be taken from prospective students, however, they can be given the option to register their interest.

(11) In accordance with the National Code, each course offered in Australia will have its own course CRICOS code before it is advertised to international students who intend to study in Australia on a student visa. The course CRICOS codes must be published with all marketing material, including the University website.

International marketing

(12) The Pro Vice-Chancellor (International) and the Office of Global Engagement (OGE) have overarching responsibility for the University's international marketing and ensuring compliance with this procedure and the

relevant legislation and regulations, including the National Code. This applies to marketing to both prospective students who will study in Australia on a student visa and those who will study with offshore partners or online.

(13) OGE 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, the Brand Guidelines, and government and industry regulations.

(14) OGE will:

a. develop and implement strategies aimed at increasing the number of international students studying on campus in Australia and by online learning, by:
    i. working with the faculties to provide on-campus study opportunities to students currently enrolled in transnational education programs
    ii. working with the faculties, schools and course coordinators to develop strategies for the markets in which they are or seek to be active
    iii. 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
b. undertake due diligence on prospective partners and actively seek new partnership opportunities
c. recruit international agents, which will include training, due diligence checks and oversight of the University's agent management as outlined in the International Education Agent Policy, and ensure agents are recruiting for the University in accordance with government and industry regulations, including those required in the National Code
d. ensure the quality assurance of marketing activities undertaken by agents and support them with hard copy marketing material and other marketing support
e. review and endorse all international marketing materials and activities
f. produce international marketing communications that are market sensitive, compliant with the necessary regulations and provide up-to-date information, and consistent with the minimum standards stated in this procedure
g. support faculties to identify, develop and manage appropriate relationships and articulation pathways
h. collect, coordinate, collate and disseminate 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
i. plan, develop and distribute international marketing materials as requested and maintain an inventory of stock quantities
j. provide up-to-date marketing materials to staff travelling overseas or staff marketing to international students
k. maintain a register of approved (or endorsed) international marketing materials.

(15) Staff travelling overseas on University business are encouraged to make contact with OGE at least two months prior to their trip to discuss marketing support, and/or to go through the staff information pack developed by OGE.

(16) All international marketing material published on the University website will be reviewed regularly to ensure compliance with this procedure.

Educational partner institutions

(17) The University has a number of contractual arrangements with educational partner institutions in Australia and overseas who deliver Charles Sturt University courses. Educational partner institutions are responsible for recruitment into their programs and compliance with this procedure, subject to the terms of the partnership contracts and

agreements.

(18) Office of Global Engagement (OGE) supports the educational partner institutions and University stakeholders and will:

a. oversee the quality assurance of marketing activities for University courses undertaken by these providers
b. work closely with the faculties to identify, develop and manage partnerships, including course delivery programs
c. guide and approve any annual marketing and recruitment activities/plans
d. provide University course brochures, application forms and other marketing materials as required
e. ensure 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
f. provide the necessary support to University staff travelling overseas on University business through the provision of training, advice and appropriate marketing materials
g. provide University staff, where necessary and appropriate, to attend admissions exercises, careers fairs, interviews and other activities organised by partner institutions
h. maintain ongoing relationships with the marketing staff of education provider institutions to ensure options for international study are maximised at both institutions
i. ensure all marketing materials prepared by education partners and third-party providers, before public dissemination, are approved in line with the Communications and Marketing Policy, the relevant partnership manual, and government regulations including those required in the National Code.

(19) OGE 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
c. the quality assurance of articulation partner activities.

Sponsorships

(20) Marketing sponsorships may be approved in accordance with the delegations set out in Delegation Schedule C - Finance (e.g. organisational unit leads at Band 7 may approve sponsorships up to the value of $1,000). However, use of the University name, logo or other brand elements by the third party must be approved as set out in the Communications and Marketing Procedure - Brand Governance.

(21) Sponsorships should also be consistent with the expenditure principles and rules set out in the Finance Management Policy.

(22) Requests for marketing sponsorships beyond the thresholds for organisational units must be submitted or forwarded to the Director, Market Strategy and Partnering.

(23) All sponsorships of third parties by the University must be reported to the Pro Vice-Chancellor (International) and will be reported in the University's annual report.

(24) This does not apply to the University's Community-University Partnerships Grant Program.

Part C - Advertising processes

Booking and approval of advertising

(25) All domestic advertising by the University must be booked via the Associate Director, Brand and Performance Marketing (or delegate).

(26) All international advertising must be booked via the Office of Global Engagement.

(27) Only staff authorised by the Executive Director, Customer Experience can place or book advertising with agencies and third parties.

(28) See the Brand and Performance Marketing and Office of Global Engagement websites for contact details.

(29) This Part does not apply to advertising for recruitment purposes or for procurement and tender purposes.

Developing an advertising campaign

(30) See 'Promotional material and publications' (Part D of this procedure) for information about how to request advertising material or campaigns.

Payment for advertising

(31) All advertising outside of corporate campaigns is funded by the organisational unit requesting the advertising. A source of funds for advertising (in the form of a cost code) must be provided prior to confirmation of booking.

(32) Once booked, the advertising must be paid for by the requesting organisational unit, even if the requested advertising does not run (e.g. as a result of the requester's non-supply of advertising copy by the creative deadline, or the developed creative material not being approved by the request owner by the deadline).

Part D - Promotional material and publications

Development and approval of promotional material and publications

(33) Brand and Performance Marketing will produce a standard corporate suite of course and marketing related promotional materials and publications to meet organisational marketing and student recruitment requirements.

(34) Requests for promotional materials and publications outside the standard corporate suite must be approved in accordance with this procedure and the Communications and Marketing Procedure - Brand Governance.

(35) Request for promotional materials and publications can be submitted via the Brand and Performance Marketing website.

(36) The Executive Director, Customer Experience (or delegate) reserves the right to reject proposals for 'non-standard' promotional materials and publications for reasons including, but not limited to:

a. inappropriateness
b. not adhering to principles and corporate strategies
c. duplication of existing materials and publications
d. inefficient or ineffective use of resources
e. no clear distribution strategy
f. sub-standard quality.

(37) Development and/or approval of non-marketing materials and publications (e.g. course-related material or corporate publications) is the responsibility of the organisational units set out in the Communications and Marketing

Procedure - Brand Governance, however, Brand and Performance Marketing welcome consultation in the process.

Payment for promotional materials and publications

(38) The Division of Customer Experience funds most items in the standard corporate suite of promotional materials and publications. These may be made available to organisational units for a price based on cost recovery of the print and production costs.

(39) All non-standard promotional materials and publications approved for production by the Division of Customer Experience are funded by the requesting organisational unit or budget centre.

Material design

(40) All University marketing and promotional materials and publications must be prepared by editorial/design staff in the Division of Customer Experience. In limited circumstances, the Executive Director, Customer Experience (or delegate) may approve the use of an agency to produce materials, however, approval must be sought prior to engaging the agency.

(41) Where an agency is used, a service agreement will be established and agreed between Charles Sturt University (as the client) and the agency. The Division of Customer Experience is responsible for the management of design agency relationships in order to ensure the best possible service for the University.

(42) All promotional materials and publications, including those prepared by an external agency, must comply with the Brand Guidelines and Editorial Style Guide.

Unauthorised publication

(43) Unauthorised publication of marketing or promotional materials will be regarded as unauthorised use of the University brand and a breach of the Communications and Marketing Policy.

Section 4 - Guidelines

(44) The following guidelines support this procedure:

a. Brand Guidelines
b. Editorial Style Guide

Section 5 - Glossary

(45) This procedure uses terms defined in the Communications and Marketing Policy, as well as the following:

a. Advertising - means a public notice, usually paid for, promoting the University or an aspect of the University. Media types where advertising may be placed include, but are not limited to, newspapers/press, journals, magazines, cinema, direct mail items, professional publications, newsletters, signage and billboards, vehicles, the internet, radio and television, SMS and direct/telephone sales, and publicity. Advertising excludes promotional materials and publications.
b. CRICOS – means the Commonwealth Register of Institutions and Courses for Overseas Students, which indicates the education providers with courses that may be offered to international students studying on a student visa.
c. Promotional material – means the material, merchandise and electronic formats used to promote products, services or organisational units of the University without paid placement. These can include, but are not limited to, flyers, booklets and brochures, posters, pull-up banners, car signage, print and electronic direct mail items

(e.g. postcards, invitations to events, etc.), websites, and electronic campaigns.

d. Marketing sponsorship – means sponsorship by the University to a third party in return for an association with an activity or event in order to positively promote the University.
e. National Code – means the National Code of Practice for Providers of Education and Training to Overseas Students 2018.

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