
POLICY C5.1

MARKETING AND INFORMATION POLICY

1.0 INTRODUCTION

1.1 Context

The AIM Business School (ABS) is a nationally accredited institute of higher education, approved FEE-HELP provider and a registered CRICOS provider and has obligations regarding marketing collateral and promotional activities under the Higher Education Threshold Standards Framework 2021 (HESF), the ESOS Framework, the Higher Education Support Act 2003 (HESA) and Australian Consumer Law.

The same obligations apply to ABS Third Party Partners and Education Agents and ABS is responsible to ensure compliance with these.

The Australian Consumer Law continues to apply to any non-AQF award programs offered by ABS.

1.2 Purpose

This policy aims to ensure that ABS marketing collateral and promotional activities (including collateral and activities by Third Party Partners and Education Agents) are ethical, current, accurate, accessible and comply with relevant legislative requirements.

1.3 Scope

This policy applies to all ABS accredited and non-accredited marketing and promotional collateral used for domestic, international and offshore student recruitment, Third Party Partners, Education Agents and ABS staff.

1.4 Scope Exceptions

None.

2.0 RESPONSIBILITIES

1. ABS staff, Third Party Partners and Education Agents are responsible to follow and comply with this policy and its procedure.

3.0 POLICY

3.1 Principles

1. ABS is committed to ensuring its marketing collateral and promotional activities are ethical, current, accurate, accessible and maintain the integrity and reputation of the Australian education sector.
2. ABS makes a range of information publicly available in order to enrolled and prospective students.
3. ABS ensures its marketing collateral and promotional activities relating to ABS education offerings, services and experiences comply with requirements set by the HESF, HESA, the ESOS Framework, any other relevant legislation, such as Australian Consumer Law legislation and with any applicable laws or obligations of host countries if marketing overseas.
4. ABS provides inductions and training on this policy and its procedure to relevant ABS staff, Third Party Partners and Education Agents.
5. All marketing collateral and promotional activities are quality assured prior to being used in the marketplace.
6. ABS will ensure that the use of third party logos, including government logos are used in line with written authorisation or published guidelines.
7. ABS will ensure it does not:
 - a. Make statements that are incorrect, or likely to create a false impression.
 - b. Offer inducements to prospective students that contravene regulatory or legislative requirements.
 - c. Use third party contact lists unless these comply with the requirements of subsection 19-36C (3) of the HESA.
 - d. Claim or promote migration or education assessment outcomes for students related to the completion of any of its program/s, or guarantee a successful outcome from undertaking a course.
 - e. Make any false or misleading comparisons with any other provider or their courses, nor any inaccurate claims about ABS's association with any other provider or organisation.
 - f. Not actively recruit a student wishing to transfer from another provider before the student has completed six months of their principal course except in circumstances permitted in the National Code 2018, Standard 7.
8. ABS undertakes reviews of its marketing collateral to ensure compliance requirements are met and reports outcomes to the AIM Corporate Board via the Audit and Risk committee.

4.0 DEFINITIONS

- **CRICOS** refers to Commonwealth Register of Institutions and Courses for Overseas Students.
- **Education Agents** means a person or organisation, under an agreement, that promotes education programs and services to international students.
- **ESOS** refers to Education Services for Overseas Students.
- **International Student** means a person (whether within or outside Australia) who holds or intends to hold an Australian student visa.
- **National Code 2018** refers to the National Code of Practice for Providers of Education and Training to Overseas Students 2018.
- **Offshore Student** means a person outside Australia that does not hold or intent to hold an Australian student visa.
- **Third Party Partner** means an organisation, other than ABS, providing education services to students on behalf of ABS via a written agreement.

5.0 REFERENCES AND ASSOCIATED INFORMATION

- ABS Marketing and Information Procedure
- ABS Education Agent Appointment, Monitoring and Termination Policy and Procedure
- ABS Third Party Policy and Procedure
- [Higher Education Threshold Standards Framework 2021](#)
- [ESOS Framework](#)
- [National Code 2018](#)
- [Higher Education Support Act 2003](#)
- [Competition and Consumer Act 2010](#)
- [Australian Association of National Advertisers Code of Ethics](#)

6.0 POLICY OWNERSHIP

Policy Owner	Head of Compliance
Status	Reviewed 20/02/2023
Approval Authority	AIM Corporate Board
Date of Approval	20 February 2023
Effective Date	22 February 2023
Implementation Owner	Chief Marketing Officer
Maintenance Owner	Head of Compliance
Review Due	October 2026

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7.0 AMENDMENTS

Version	Amendment Approval (Date)	Amendment Made By (Position)	Amendment Details
C5.0	18 October 2022	Corporate Board	New Policy established.
C5.1	20 February 2023	Head of Compliance	Minor Administrative update to Section 5 to add reference to AACNA code of ethics.