



CHRISTIAN HERITAGE COLLEGE

POLICY: Marketing Information and practices to Overseas Students

Policy Group(s): Group D: Business Management – 2: Marketing (Ref: D2/0610.1-0415; 0118)

Related Policy: Education Agents
Grievance Policy for Overseas Students
Refunds for Overseas Students
Transfer Between Registered Providers

Commencement Date: January 2007 **Review Date:** January 2018
January 2023

POLICY STATEMENT

Intent:

This policy underpins all marketing activity by Christian Heritage College (CHC) to overseas markets and applicants to ensure compliance with the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (the National Code 2018). CHC will not knowingly falsify or provide misleading information about its location, courses or benefits of study at CHC in any way, nor will it intentionally misrepresent any aspect of study in Australia. Honesty and integrity are important attributes of Christian witness 'The integrity of the upright will guide them' (Proverbs 11:3) and 'Lying lips are an abomination to the Lord' (Proverbs 12:22a). Christian Heritage College (CHC) aims to model honesty and integrity in all interactions with stakeholders and the wider public.

Scope:

All overseas markets and applicants. All CHC staff

Restrictions: Nil

Exclusions: Domestic Students

Objectives:

1. To provide clear guidelines for marketing CHC courses to overseas markets and applicants.
2. To safeguard against unethical marketing practices.
3. To provide CHC processes to ensure all marketing is based on accurate course information. See *Supporting Procedures and Guidelines 1*.
4. To comply with the *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (the National Code 2018) specifically National Code Standard 1.

Policy Provisions:

1. General

- 1.1. CHC will ensure that the marketing and promotion of courses education services in connection with the recruitment of overseas students or intending overseas students, including through an education

- agent, is not misleading, and complies with Australian Consumer Law.
- 1.2. CHC will ensure all marketing information and practices are professional and ethical.
 - 1.3. Council of Christian Colleges and Universities (CCCU) or any education agents engaged by CHC will only market material that has prior approval by CHC.
 - 1.4. CHC will not make false comparisons with other providers.
 - 1.5. CHC will not provide any false or misleading information when seeking to enter into written agreements with overseas students or intending overseas students. This includes:
 - 1.5.1. its association with any other persons or organisations CHC has arrangements with for the delivery of the course in which the student intends to enrol or may apply to enrol;
 - 1.5.2. any work based training a student is required to undertake as part of the course;
 - 1.5.3. pre-requisites – including English language proficiency – for entry to the course;
 - 1.5.4. any other information relevant to CHC, its courses or outcomes associated with those courses
 - 1.1. CHC will not:
 - 1.1.1. make any claim to commit to secure for, or on the student or on the intending student's behalf, a migration outcome from undertaking any course offered by CHC;
 - 1.1.2. guarantee a successful education assessment outcome for the student or intending student.
 - 1.2. All CHC marketing will be edited with care and will reflect the knowledge and specialisation of CHC as a higher education provider.
 - 1.3. CHC's Registered Name (Legal entity) and CRICOS Registration Number shall be clearly identified on all material, printed or online that it disseminates or makes publicly available for the purposes of:
 - 1.3.1. providing or offering to provide a course to an overseas student;
 - 1.3.2. inviting a student to undertake or apply for a course; or
 - 1.3.3. indicating it is able or willing to provide a course to overseas students.
 - 1.4. This material includes:
 - 1.4.1. staff email tags;
 - 1.4.2. all CHC publications;
 - 1.4.3. all other correspondence with overseas enquirers, applicants and students;
 - 1.4.4. the CHC website and any electronic media produced by or for CHC;
 - 1.4.5. any advertising material on websites other than CHC's own website, in newspapers or magazines;
 - 1.4.6. the removable section of any material that contains a pull-out or tear-away section.
 - 1.5. CHC will include the individual CRICOS course codes on all course material.
 - 1.6. CHC will not provide any information or advice to overseas enquirers, applicants or students which is false or misleading including advice in relation to:
 - 1.6.1. claims of association with other providers;
 - 1.6.2. employment outcomes associated with a course;
 - 1.6.3. automatic acceptance into another course;
 - 1.6.4. possible migration outcomes; or
 - 1.6.5. any other claims relation to CHC, its course or outcomes associated with the course.
 - 1.7. CHC will not knowingly enrol a student wishing to transfer from another provider before the student has completed one semester of their principal course except in circumstances outlined in Standard 7 of the National Code 2018 and in CHC's *Transfer Between Registered Providers* policy. These restrictions also apply to courses taken before the principal course in a package of courses.
 - 1.7.1. CHC will maintain records of all transfer of provider applications and outcomes.

- 1.8. CHC will ensure any agents who are engaged to assist CHC in the recruitment of overseas applicants are operating in an ethical and professional manner as per the provisions of CHC's *Education Agents* policy and procedure and the National Code 2018 Standard 4.¹
- 1.9. CHC or its agents will not engage in the active recruitment of students enrolled with other providers.
- 1.10. CHC will inform students of the modes of study through which the course may be offered as per the course marketing material.
- 1.11. Any changes will be advised in writing to students.

2. Preparation of Marketing Materials

- 2.1. Within the annual cycle, CHC will prepare the marketing material following the process outlined in Section 1 of the *Supporting Procedures and Guidelines*.
- 2.2. Any material to be used for marketing CHC and/or any of its courses must be jointly signed off by the Marketing Manager and the Academic Registrar.
- 2.3. CHC will approve any marketing materials produced by Citipointe Ministry College (CMC), as the CHC School of Ministries.
- 2.4. CHC will version control all CHC publications.

3. Third Party Arrangements

- 3.1. CHC will maintain control over the marketing of any third-party articulation arrangement to ensure that no false or misleading information is provided to prospective applicants and/or students.
 - 3.1.1. This information will be included in any agreement or Memorandum of Understanding.

Supporting Procedures and Guidelines:

1. Procedure for the preparation of CHC marketing materials.

- 1.1. In November of each year the Registry Office checks the schedule of CHC courses covered by CRICOS to ensure that all courses to be offered overseas applicants and students in the following academic year and all courses with current enrolments by overseas students are included in the schedule.
- 1.2. The review will include course durations and costs and as necessary CHC will notify the Regulator of any changes required to PRISMS.
- 1.3. The Marketing Manager liaises with the Registry Office regarding changes that have occurred in terms of the courses that are available to overseas students (additions, deletions) and the application processes that apply to overseas students.
- 1.4. The Marketing Manager liaises with the Deans of Schools to determine any changes they wish to be included in the marketing materials.
- 1.5. CRICOS registered name, full legal entity, registration number and CRICOS course codes shall be checked to ensure that they are included in the marketing materials.
- 1.6. Changes (as applicable) are included in draft materials which are submitted to the Academic Registrar for approval.
- 1.7. Approval for the changes is given by the Academic Registrar, or further changes (as applicable) are suggested by the Academic Registrar.
- 1.8. The approved changes are returned to the Marketing Manager for inclusion in the published material. The process of 1.4 – 1.6 continues until all changes are approved by the Academic Registrar.
- 1.9. The Marketing Manager and the Academic Registrar co-sign the approved marketing materials for publishing either in hard copy or on the CHC website.

2. Procedure for the preparation of CMC marketing materials.

- 2.1. CMC's Marketing Officer liaises with the Registry Office regarding any changes to the CMC website.

¹ CHC does not currently use any agents to recruit applicants and/or students. Should this situation change, CHC will institute a quality assurance process to ensure the ethical and professional practice of the agent.

This includes the courses that are available to overseas students (additions, deletions), any articulation from courses into the School of Ministries courses and the application processes that apply to overseas students.

- 2.2. Changes as applicable are included in draft materials which are submitted to the Academic Registrar and the CHC Marketing Coordinator for approval.
- 2.3. Approval for the changes is given by the Academic Registrar, or further changes (as applicable) are suggested by the Academic Registrar.
- 2.4. The approved changes are returned to the CMC Marketing Officer for inclusion in the published material. The process of 2.2 – 2.3 continues until all changes are approved by the Academic Registrar.
- 2.5. The CMC Marketing Coordinator, the CHC Marketing Coordinator and the Academic Registrar co-sign the approved marketing materials for publishing either in hard copy or on the CMC website.

3. Third Party Arrangements

- 3.1. Prior to committing to any third-party arrangement for the delivery of courses to overseas students, CHC will contact the regulator to ensure any such arrangement meets its obligations under its CRICOS registration.
- 3.2. CHC will control all the marketing materials containing information about CHC thus ensuring the ethical and accurate marketing of CHC and its courses.

POLICY FURTHER INFORMATION

Relevant Commonwealth/State Legislation:	ESOS Framework, including: ESOS Act 2000 ESOS Regulations 2001 National Code 2018 HESF (2015)
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ACCOUNTABILITIES

Implementation:	Academic Registrar
Compliance:	Academic Registrar's Office
Monitoring and Evaluation:	Academic Registrar's Office
Development/Review:	Director of Quality and Standards
Approval Authority:	CHC CEO
Interpretation and Advice:	Academic Registrar

WHO SHOULD KNOW THIS POLICY?

Academic Registrar
Admissions Officer
CMC Marketing Coordinator
CMC Principal
Course Coordinators
Deans
Director of Student Services
Marketing Manager
Overseas Student Liaison Officer

EFFECTIVENESS OF THIS POLICY

- Performance Indicators:**
- Number of breaches of the policy identified internally or externally
 - Number of successful marketing campaigns

Other: Nil

Definitions and Acronyms:

CHC Christian Heritage College
 CoE Confirmation of Enrolment Certificate
 Dean the Head of the School administering the course, including the Executive Director of the Millis Institute;
 PRISMS Provider Registration and International Students Management System
 Schools references to Schools includes the Millis Institute
 TPS Tuition Protection Scheme

APPROVAL – section maintained by the Director of Quality and Standards

Reference No.	Approved	Date	Committee/Board	Resolution No. / Minute Ref.
C3/0610.1	Yes	29/06/2010	Committee of Management	8

REVISION HISTORY – section maintained by the Director of Quality and Standards

Revision Reference No.	Approved/Rescinded	Date	Committee/Board	Resolution No. / Minute Ref.
0712	Approved	24/07/2012	CHC CEO	4.1
0415	Approved	28/04/2015	CHC CEO	NA
0118	Approved	01/01/2018	CHC CEO	NA

Additional Changes:		Date
New title: Marketing information and practices to Overseas Students	Existing title: Marketing to Overseas Students	January 2018