

Policy Name:	Marketing Practices
Policy Number:	1-CRICOS-2011
Current Version:	04 – 01/07/2014
Next Revision Date:	July 2015
Purpose:	The purpose of this policy is to reaffirm PGA IGI's commitment to meeting the requirements of the National Code of Practice 2007 which requires additional Code of Conduct statements in relation to overseas students.
Scope:	All Staff and International Students
Exceptions:	Domestic Students
Policy Owner:	Marketing and Student Recruitment Manager
Related policies and legislation:	<ul style="list-style-type: none"> • Education Services for Overseas Students (ESOS) Act 2000 (https://www.aei.gov.au/ESOS) • The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2007 (https://www.aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Documents/National_Code_2007_pdf.pdf) • For further detailed information on the legislative requirements in the National Code 2007, see National Code Explanatory Guide (https://aei.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Pages/default.aspx)
Internal procedures guided by this policy:	N/A
Published Location	<ul style="list-style-type: none"> ▪ Y:\Administration - Compliance\Policy & Procedure – Master File\CRICOS

Revision History

Revision Date:	Status: (Draft/Final)	Summary of Changes	Prepared/Approved By:	Revision #:
17/05/2011	Draft	Document development	Institute Coordinator	01
18/05/2011	Draft	Final draft and approval	Institute Coordinator	02
18/05/2011	Final	Final draft and approval	CEO	03
01/07/2014	Final	Updated web links and staff title, renamed to marketing practices	Systems Administrator/Dean and Executive Officer	04

Glossary of Terms/Definitions

ASQA	Australian Skills Quality Authority
Code of Conduct	A code of conduct is a set of rules outlining the responsibilities of or proper practices for an individual or organisation.
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
ESOS	Education Service for Overseas Students
High Managerial Agents	An employee, agent or officer of the PGA IGI with duties of such responsibility that his or her conduct may fairly be assumed to represent the provider in relation to the business of providing courses.
PGA IGI	PGA International Golf Institute
PRISMS	Provider Registration and International Students Management System (PRISMS). This site provides Australian education providers with the Confirmation-of-Enrolment (CoE) facilities required for compliance with the Education Services for Overseas Students (ESOS) Legislation

Procedure Measures

Procedure Measures	Target
That if any product does not conform it is rectified within 24 hours so that the marketing of our services is professional, accurate and maintains the integrity and reputation of the industry.	100%

Distribution

All Directors
 All PGA IGI Staff
 All International Students

Policy Statement

The PGA IGI ensures that marketing of our education and training services is professional, accurate and maintains the integrity and reputation of the industry. In marketing our education services we will not actively recruit a client where this clearly conflicts with our obligations under Standard 7 (Transfer between registered providers).

Our Service & Product Marketing Responsibilities

We will clearly identify our name and CRICOS number in written marketing and other material for prospective students and education agents, including electronic form, and we do not give false or misleading information or advice in relation to:

- claims of association between providers
- the employment outcomes associated with our course
- automatic acceptance into another course
- possible migration outcomes
- any other claims relating to us, our course or our outcomes associated with the course

Staff Education & Professional Development

We ensure that our staff members are aware of our marketing responsibilities and their role in marketing of our education and training services in a professional and accurate manner by:

- in-house training
- meetings and discussions
- attending training sessions by third party providers
- accessible and current legislation materials (CRICOS, ESOS and other education legislation)
- structure processes, including staff position descriptions and contracts where applicable

Development of Our Marketing Materials

The Marketing and Student Recruitment Manager is responsible for the development of marketing materials and other marketing services. Prior to releasing any marketing materials the Marketing and Student Recruitment Manager will ensure marketing material is compliant by:

- completing a pre-release check list
- consultation with the Dean and Executive Officer
- seeking final approval from the Dean and Executive Officer

Monitoring of Our Marketing Information

The Marketing and Student Recruitment Manager and the Dean and Executive Officer conduct random audits on our marketing materials and services to ensure we are meeting our responsibilities under current legislation. Any product or service that does not conform is 'Red Flagged' (withdrawn immediately and rectified within 24 hours). Any marketing materials found to be non-compliant will be noted in the Marketing Non Compliance Register. All staff involved will be made aware of a non compliant product or service via a formal meeting with the Dean and Executive Officer.

Monitoring of Education Agents

The PGA IGI does not generally permit education agents to produce their own marketing materials; all material is provided to agents by the Marketing and Student Recruitment Manager. If an agent does produce marketing materials they must first send a copy to us for review and approval. We monitor agent websites to ensure that they are meeting their responsibilities in relation to ethical, professional and accurate marketing of our products and services. We randomly interview international students to gain feedback on agents and the marketing and recruit process. Any marketing materials found to be non-compliant will be noted in the Marketing Non Compliance Register.

We take corrective action as soon as practicable if an education agent is found to be in breach of our marketing requirements. Any agent in breach will be asked to show cause why their contract should not be terminated.

Advertising Our Agents

The PGA IGI will maintain a list of all persons, whether within or outside Australia, who represent or act on our behalf in dealing with overseas students or intending overseas students. The PGA IGI will publish the list on our website. We will ensure that:

- the list of agents is available on or clearly searchable from our home webpage
 - consistent with Standard 4 of the ESOS National Code 2007, this requirement is taken to mean listing only those education agents with whom the provider has a formal written agreement (as opposed to listing agents who act independently on behalf of a student or parent of a student)
- the online location of this information is readily accessible to students and regulators
 - we include at a minimum the agency name, name of the principal agent, legal entity and street address(es)

This policy will be reviewed annually and revision history updated.