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<b>Documents:</b>	Blackfriars Collaborative Learning Community – Vibrant Community		
<b>References:</b>	Consent to Publish Privacy Policy		
<b>Relevant Standards:</b>	ELICOS National Standards 2018 Education Services for Overseas Students (ESOS) Act 2018 National Code of Practice for Providers of Education and Training to Overseas Students 2018		
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<b>Position:</b>	Principal		

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## PURPOSE

This policy is to ensure that all stakeholders are aware of and conduct marketing activities in accordance with Blackfriars Priory School's (Blackfriars) marketing standards.

For the purposes of this policy the term 'stakeholder' refers to any student, employer or organisation utilising the services of, sponsoring or in partnership with Blackfriars.

## POLICY

It is an offence to make false or misleading statements regarding services or education/training and penalties are applicable.

It is the policy of Blackfriars for all school materials, services and products to be always advertised and marketed in an ethical manner.

All marketing or advertising must comply with the following:

- The logos of other approving bodies and partner organisations can only be used with their approval;
- All stakeholders utilising the services of the company will be provided with full details of any contractual arrangements they may enter into;
- All training packages, products and services marketed by the company will be accurately represented to prospective stakeholders;
- No false or misleading statements regarding the products and services of the company will be made in any advertising or marketing;
- No misleading or false comparisons to other companies will be advertised or marketed;
- Written permission will be obtained from any stakeholders before using any information regarding, or photographs portraying, that individual in promotional, marketing or advertising materials (refer Consent to Publish)
- All marketing and advertising material are to be approved by the Principal or delegate prior to publishing or release.

It is the policy of Blackfriars to ensure that written permission is gained from any person or organisation to be included or spotlighted for use in any marketing or advertising material which refers to that person or organisation. Blackfriars must abide by the conditions of that permission.

Additionally, as per Standard 1 of the National Code Part D for the delivery of training to overseas students – Marketing Information and Practices – the following applies:

1. Blackfriars must ensure the marketing of our education and training services is undertaken in a professional manner and maintain the integrity and reputation of the industry and registered providers.
2. Blackfriars must:
  - Clearly identify our name and CRICOS number in written marketing and other material for students, including electronic form; and
  - Not give false or misleading information or advice in relation to;
    - o claims of association between providers
    - o the employment outcomes associated with a course



- o automatic acceptance into another course
  - o possible migration outcomes; or
  - o any other claims relating to Blackfriars, our courses or outcomes associated to our courses.
3. Blackfriars must not actively recruit a student where this clearly conflicts with our obligations under Standard 7 of the National Code 2007.

Further, Blackfriars observes the QA(E) of the NEAS QA Framework – Quality Principles and Practices:

- Promotional material is ethical, accurate and consistent
- Essential information about Blackfriars and its' services/courses is readily accessible
- All staff are involved in building Blackfriars credibility and profile via contact with students and other stakeholders
- Blackfriars makes explicit reference to quality assurance items such as CRICOS status and ELICOS registrations

## PROCEDURE

All persons or entities to feature or participate in any marketing or advertising are to be requested to complete permission forms.

If permission is not gained the marketing / advertising which includes the entity or individual must not proceed.

If permission is gained:

- All images, recordings and other information must be stored as per Privacy and Record Keeping Policies affording the entity or individual the highest degree of security;
- A proof of any production must be provided to the entity or individual prior to final use;
- An update to accurate record of all use of items is to be maintained;
- A record of the permission expiry is to be maintained and a new permission sought, if necessary, prior that expiry.

The process for developing materials is:

- All identified marketing or advertising needs must be advised to the Principal in the first instance.
- The Principal:
  - o will ensure that any third party named or represented in the materials has completed or completes Permission to Publish consent;
  - o will advise whether the material can be developed internally or whether the provider of choice is to be engaged.
- A draft of the marketing / advertising material is to be produced.
- The draft is to be copied to any third party named or represented in the materials for their approval.
- The final draft is to be presented to the relevant staff for input.

Once approved, the Principal will arrange or delegate the production of the material.



It is the responsibility of the Principal to:

- ensure that all records related to marketing / advertising permissions, use of materials, and permissions and expiry dates are maintained.
- determine whether the material is developed internally or externally;
- arrange production of the material.

It is the responsibility of the Principal to ensure that all advertising / marketing is accurate and ethical and that necessary permissions have been gained prior to use of third-party materials.

### Planning

Marketing material in all forms will be reviewed at least annually in line with the process for the Business Plan and the Marketing Plan.

In August each year material for the following year will be prepared to ensure that current courses are marketed to agents and prospective students.

It is Blackfriars preference that material be electronic in the form of PDF, website and social media to facilitate currency.

### Compliance

Compliance with the National Standards for ESOS, CRICOS, ELICOS and Delegation agreements are essential for Blackfriars. Each update to the CRICOS Scope must be completed in writing using the approved application processes determined by the relevant regulator. The applications must be checked for correctness by the relevant department Director prior to submission by the Principal. The Principal must check that the application has been approved and actioned correctly by the regulator.

Listings on the CRICOS, Study Adelaide must be checked for correctness by the Director of Development & Community Relations after each update.

Each update to the website must be checked by the Director of Development & Community Relations to ensure details are compliant with marketing guidelines and registration details. Marketing details must be consistent across all mediums used to promote courses and services



## RESPONSIBILITY

### Principal

The Principal and /or delegate have the authority to approve advertising or marketing materials.

### Director of Development & Community Relations

It is the responsibility of the Director of Development & Community Relations to maintain currency of marketing material and plan for updates in response to

- changing requirements (regulator policy, legislation relating to the governance of education)
- alterations to product
- adjustments to schedules, timetables and changes in calendar year
- present alterations to meetings for approval
- work with the contracted organisation to ensure material is completed in a timely manner
- ensure distribution of material to agents and representatives to facilitate marketing.

### Staff and Contractors

It is the responsibility of all Blackfriars staff and contractors to abide by this policy.

Penalties that may be applied to for false or misleading statements may include:

- \$100,000 for Blackfriars;
- \$20,000 for natural persons – individuals
- sanctions applied to Blackfriars within 24 hours;
- ESB publicised warnings regarding Blackfriars as a provider that may adversely affect its students.

Additionally, students will be able to seek compensation through the court system.

All staff and contractors should be aware that if they are found to be making false or misleading statements to students in regard to education or services delivered by Blackfriars, they may be subject to instant dismissal from employment or termination of contract.

## ACCESS

Entities and individuals have access to advertising / marketing records as per Privacy Policy.