



# Marketing Policy and Procedure

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## PURPOSE

The purpose of the 'Marketing Policy and Procedure' is to provide a set of guidelines and procedures to ensure Frontier provides clear and accurate information in its marketing, advertising and recruitment practices that enable students to make informed choices before enrolling in the courses listed within Frontier Institute of Technology's scope.

## SCOPE

This policy applies to all enrolments in courses offered by Frontier Institute of Technology, including all:

- VET courses;
- Short Courses;
- Accredited courses.

This policy applies to:

- Students;
- Marketing employees;
- Business development employees
- The CEO and the Compliance Manager who will be responsible to ensure compliance with this policy.

## RELEVANT STANDARDS, ACTS AND LEGISLATION

Standards for Registered Training Organisations (RTOs) 2015 – Clauses 4.1

National Vocational Education and Training Regulator Act 2011 (the Act).

## DEFINITIONS

|   |  |
|---|--|
| <b>SRTO</b>                                   | Standards for Registered Training Organisations (RTOs) 2015<br><br>Standards for Registered Training Organisations. A legislative instrument describing the minimum standards to be met by RTOs through the VET Quality Framework. <a href="http://www.asqa.gov.au/about-asqa/national-vet-regulation/vetquality-framework.html">http://www.asqa.gov.au/about-asqa/national-vet-regulation/vetquality-framework.html</a> |
| <b>Registered Training Organisation (RTO)</b> | A training organisation authorised to deliver VET Programs and courses.  |
| <b>TAS</b>                                    | Training and Assessment Strategies are the methods adopted by an RTO, with respect to Training and Assessment, designed to enable learners to meet the requirements of the Training Package or accredited course.  |

|  |   |
|--|---|
| <b>AQF</b>                                   | Australian Qualifications Framework   |
| <b>VET</b>                                   | Vocational education and training   |
| <b>ASQA</b>                                  | Australian Skills Quality Authority (ASQA), the national regulator of Australia's vocational education and training sector  |
| <b>Third party</b>                           | <p>Any party that provides services on behalf of the RTO, but does not include a contract of employment between an RTO and its employee. (def according to ASQA)</p> <ul style="list-style-type: none"> <li>• Recruitment of prospective learner</li> <li>• Enrolment of learners (incl. fee receipting)</li> </ul> |
| <b>Agent</b>                                 | An accredited person or Organisation with the authority to promote Frontier Institute of Technology's courses and services to students or prospective students in nominated regions.  |
| <b>Marketing and advertising collaterals</b> | Marketing and advertising collaterals are any media material used to promote a company's products or services. This may include everything from print materials to digital content.   |
| <b>Marketing and advertising campaigns</b>   | Marketing and advertising campaigns are organized, strategized endeavours to promote a specific company's product or service.   |
| <b>Marketing and advertising content</b>     | Content marketing and advertising content is the process of planning, creating, sharing, and publishing content to reach a specific target audience.  |

## POLICY STATEMENT

1. All marketing and advertising collateral or content used by Frontier for marketing and advertising purposes are accurate, factual, clear and valid.

2. Frontier ensures all marketing and advertising campaigns are reviewed prior to execution.
3. Frontier ensures to update all marketing content for any collateral to meet compliance and currency with the Training and Assessment Strategies for a course within Frontier's scope of delivery and assessment.
4. Frontier ensures all marketing and advertisement practices are monitored to ensure compliance.
5. Frontier ensures all third-party providers engaged in marketing and recruitment are governed and monitored by Frontier.

## PROCEDURES

The following procedures set out the process, tools and staff responsible to execute the policy statement detailed above.

### POLICY STATEMENT 1: PROCEDURES TO PROVIDE CLEAR, FACTUAL, ACCURATE AND VALID INFORMATION

#### 1.1. Fixed information

Frontier ensures that every marketing and advertising collateral including social media and website must include, wherever appropriate, the following information at all times:

- a. The RTO's full legal name, trading name and RTO Code i.e. Frontier Training and Technology Pty Ltd T/A Frontier Institute of Technology, RTO 21244;
- b. If the collateral highlights only the trading name, a footer containing the RTO's full legal name and code must be included in the collateral;
- c. The NRT (Nationally Recognised Training) logo used in accordance with the conditions of use as specified in Schedule 4 of the SRT0 2015;
- d. The title and code of the training product in question, as published on the national register;
- e. The complaint and appeal disclaimer;
- f. The Privacy Policy disclaimer;
- g. A disclaimer stating that 'Frontier does not guarantee that a student will successfully complete any accredited or non-accredited course within its scope, if he or she fails to meet the course's training and assessment requirements, as agreed prior to enrolment. Frontier does not guarantee any employment on successful completion of any course within Frontier's scope'.

#### 1.2. Variable content

Variable content is information that tends to change from time to time, but must meet certain requirements as outlined below:

##### a. Course information

Any information outlined in marketing and advertising collaterals or content must be derived from the course's current Training and Assessment Strategy. Those categories of information are as follows:

- The title and code of the training product in question, as published on the national register;

- The course duration must be always the maximum time [frame][NF1][L2] in months;
  - The delivery mode must be clear and as per the Training and Assessment Strategy;
  - The volume of learning and amount of training must be outlined only in brochures, course information booklets and website;
  - The course overview with a summary about the course;
  - For whom the course is suitable must be clear and specific;
  - Entry requirements;
  - The course structure, wherever applicable;
  - Fees and refund procedures;
  - Recognition of prior learning and credit transfer, wherever applicable;
  - The NRT (Nationally Recognised Training) logo used in accordance with the conditions of use as specified in Schedule 4 of the SRTO 2015
- b. General information for brochures (international students), course information booklets (domestic students) and websites only
- Entitlements and attendance responsibilities of students enrolled in a course;
  - Concurrent and cross-institutional enrolments;
  - Variations to enrolment;
  - Cancellation of enrolment by a student or by Frontier;
  - Effect of exclusion, suspension or expulsion;
  - Enrolment procedure;
  - Third Party Agents' company name and services they provide. [NF3][NF4][L5][L6]

All of the above categories of information may be in the format of a single line statement or a detailed explanation depending on the medium the marketing collateral or campaign has been or will be designed for.

c. Standard marketing and advertising collaterals and content

Frontier's standard marketing and advertising collaterals and content are:

- Course brochure;
- Course information booklet;
- Website content.

Other marketing and advertising collaterals or content may be developed and designed based on the analysis of the current market's needs and the marketing strategy. A detailed marketing and social media tracker is maintained by the Marketing Manager to track and record all promotions and social media campaigns designed throughout the year. Further, as per Frontier's Continuous Improvement Plan, the Compliance Manager audits the Marketing and Social Media Tracker reports.

## POLICY STATEMENT 2: PROCEDURES TO REVIEW PRIOR TO EXECUTING OR PUBLISHING ANY MARKETING AND ADVERTISING COLLATERALS OR CONTENT

Wherever applicable, Frontier ensures to continuously review any marketing and advertising content prior to execution or publication. There is a procedure to derive content on any course prior to developing content and collaterals. The procedures are outlined below:

- a. A draft of the marketing and advertising content is sent to the Compliance Manager and only after the Compliance Manager's approval, a final version is created. The Marketing and Social Media Campaign tracker also gets updated after the Compliance Manager's approval. The Compliance Manager uses a checklist to review the content.
- b. Prior to developing any content for marketing and advertising purposes, the Marketing team must review and understand the Training and Assessment Strategy for course in question and its respective target cohort. The Marketing team must sign off that they have read and understood the content from the Training and Assessment Strategy and fill out [a](#)[NF7](#)[L8](#)[L9](#) checklist to ensure compliance with the Training and Assessment Strategy. Further, the draft version along with the checklist are then reviewed by the Compliance Manager. Upon approval, a final version is created.
- c. Prior to updating any information on the website, brochure or course information booklet, a permission from the Compliance Manager must be sought and the draft must be presented for approval.

### POLICY STATEMENT 3: PROCEDURES TO UPDATE CONTENT AS PER THE CURRENT TRAINING AND ASSESSMENT STRATEGIES IN PRACTICE

#### 3.1. Content update as per the current Training and Assessment Strategies in practice

The Training and Assessment Strategies developed for the courses within the Frontier's scope may require amendments or changes for the following reasons:

- Whenever a new target group is identified;
- Whenever a new or different delivery method or assessment method is determined or identified or adapted or altered;
- Whenever a course or unit of competency is superseded;
- Whenever the training package requirements changes;
- Whenever the volume of learning and amount of training is changed or updated.

The above are standard reasons for updating the Training and Assessment Strategies developed for the courses within the Frontier's scope. However, there could be other reasons which may impact the courses' Training and Assessment Strategies.

Regardless of the reason that required a change, an update or alteration, the changes in the new Training and Assessment Strategy must be communicated to the Marketing team in written form via email. The Operation Managers is responsible to ensure compliance with the Training and Assessment Strategies of any course and it is the responsibility of the Operations Manager to update the Marketing team about any changes to the Training and Assessment Strategies of any course.

On occasion, where a new target cohort is determined through a market research or other sources, the Operations Manager develops the Training and Assessment Strategies with the help of the Trainers and Assessors and the Compliance Manager. The CEO is responsible to review

and finalise the document, which thereafter is sent to other relevant departments including the marketing department to make the necessary changes or alterations to in the tools, systems and documents.

### 3.2. Addition of scope, withdrawal of scope and RTO contact details content update

Due to continuous improvement, on occasion, amendments, changes or updates may be required in materials and documents. That may include, but are not limited to the following:

- Marketing collaterals;
- Any Forms related to students and agents;
- Procedures related to students and agents.

Frontier will make the above changes promptly through an outlined procedure to ensure that Frontier's marketing and business teams, agents and prospective students are up to date with Frontier's business practices. Upon registering the change (occurred due to any reason as specified in the continuous improvement record), within 10 working days, the Compliance Manager will send a written notification to the marketing and business teams and agents (whichever relevant or whichever has a direct impact due to the change) informing them of the necessary actions to be taken, such as updating their website, marketing collaterals, etc. Prior to publishing the amended documents or information, a draft must be prepared and resent to the Compliance Manager for approval. Upon approval, the material or information can be publicly published on the website and other marketing and advertising collaterals.

Whenever there are any new accredited or non-accredited courses added or withdrawn from the Frontier's scope of delivery and assessment, Frontier ensures to update its marketing collaterals and other relevant collaterals within 10 working days, if determined reasonable.

When a new course or unit of competency are added to Frontier's scope, the Operations Manager will prepare an implementation plan and develop the training and assessment strategy. Upon formally completing and recording the Training and Assessment strategies, the Operations Manager formally conducts a meeting with the compliance, academic, marketing and business teams to discuss the implementation and execution of the new course. Upon agreed intake dates and marketing information, the Operations Manager allocates respective work to get documentations and information ready for formatting. Once the drafts are ready, the collaterals are reviewed and approved by the Operations Manager and Compliance Manager, prior to publication. Please refer to the 'Training and Assessment Policy and Procedure' for more details.

When a course or unit of competency is removed from Frontier's scope of delivery and assessment, Frontier will first ensure that all students currently enrolled in the course have successfully completed it. One month prior to the planned course withdrawal/removal, all marketing activities will be ceased and all Education Agents/Third party providers will be notified to simultaneously cease all their marketing activities. Once it is assured that all marketing activities and operations are ceased, Frontier will formally notify ASQA through ASQAnet to remove the course or unit of competency.



## POLICY STATEMENT 4: PROCEDURES TO MONITOR MARKETING AND ADVERTISING PRACTICES

Frontier is committed to continuous monitoring of the marketing, advertising campaigns and practices. The Marketing and Business Development teams update their leads and prospects in Hubspot, a cloud-based CRM software platform. The Marketing team also maintains a marketing tracker report to record ongoing campaigns published in different social media channels and paid campaigns.

Students' feedback is sought upon enrolment via email or in person to learn whether they were provided with correct information from the sales and business development team. This procedure is often conducted during the induction day. Upon completion of the course students are provided with a quality indicator survey form to provide overall feedback on their experience with Frontier while their training and assessment journey.

As per the Continuous Improvement plan, the Compliance Manager conducts audits on the Marketing and Business development team to ensure compliance on their ongoing practices. A report is created and the findings and continuous improvement strategies, if any, are recorded. Please refer to 'Frontier's Continuous Improvement Policy' for further information.

## POLICY STATEMENT 5: PROCEDURES TO MONITOR THIRD PARTY PROVIDERS

Frontier ensures that every Frontier Third Party provider engaged in recruitment and fees collection are provided with an agreement and a Third-party manual that determines their roles and responsibilities and sets guidelines to marketing practices they ought to follow while promoting Frontier's courses through any medium.

All third-party providers must strictly use only Frontier's Marketing brochures and course information booklets while marketing and promoting Frontier's courses on their websites or social media channels. Frontier has set the following guidelines that are compulsory to follow, but are not limited to:

- All third-parties are required to gain approval from Frontier before publishing any marketing and advertising content;
- If a non-RTO is recruiting students under a third-party agreement, all marketing and advertising collaterals must use the name of the RTO (and not the name of the third party).
- Marketing and advertising content may include the name and/or logo of the third party, providing it is clear to the reader that the RTO (Frontier) is responsible to deliver and assess the VET course.
- Third-party agents or sub-agents do not have the right to use Frontier's name or logo in their marketing or advertising campaigns without our approval.
- Frontier Institute of Technology has the right to terminate the agreement at any time without notice if proved that the third party or any of their sub-agent/s engaged in unconscionable conduct and/or had false and/or misleading representations and/or breached any unsolicited consumer agreements.

- Third-party providers do not have the right to disclose information related to processing times for certificate issuance without Frontier’s knowledge or approval.
- If the third-party provider is collecting course fees from students on behalf of Frontier Institute of Technology, they must use the invoice template provided by Frontier Institute of Technology. This is to inform students that services are being provided on behalf of Frontier Institute of technology.
- A third-party provider providing false or misleading information is considered an offence under state and federal laws.

## Quarterly Agents Performance Review

Frontier Institute of Technology will be conducting a performance review quarterly and generating a report based on:

- Current practices
- Ensure current marketing and advertising collaterals are being used
- Discuss any issues or concerns

A meeting minutes report and a performance review report will be filed and maintained by Frontier. If the third party’s performance is found to be not-satisfactory on a continuous basis, Frontier Institute of Technology will take the necessary steps to terminate the third-party provider. Further detailed information on third-party providers is outlined in the following documents: Third-Party Provider Policy, Third-Party Manual and Agreement.

## POLICY FURTHER INFORMATION

### Revision history

| Revision | Approved/Rescinded | Date      | Responsible    | Document reference               |
|----------|--------------------|-----------|----------------|----------------------------------|
| V 1.0    | Approved           | Oct 2016  | Lupa Borah     | Marketing and recruitment policy |
| V.2.0    | Approved           | Nov 2017  | Lupa Borah     | Marketing Policy and Procedure   |
| V 3.0    | Approved           | June 2020 | Natalia Forato | Marketing Policy and Procedure   |

### Accountabilities

**Implementation:** Marketing Manager

**Compliance:** Compliance Manager

**Monitoring and evaluation:** Marketing and Compliance Manager

**Development/Review:** CEO/Operations Manager

**Approval authority:** CEO

### Who should know this policy?

All marketing and business development employees, Compliance Manager, Operations Manager and CEO

### Effectiveness of this policy

**Performance indicator(s):** Reduce the number of marketing and recruitment related complaints and issues.

### Related policies and documents

Course Information Booklets

Course Brochures

Enrolment Form

Third-party manual and agreement

Compliance checklist

Marketing Tracker

**Policies:**

Third-party policy

Continuous Improvement Policy

Training and Assessment Policy