

## Purpose

The purpose of this policy and procedure is to outline Pakenham Institute's approach to ensuring it markets and advertises its courses ethically and accurately, in compliance with Standards 4 and 5 of the Standards, as well as the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018, Standard 1 and 2.

## Policy

### 1. Marketing information

- Pakenham Institute ensures the information provided to students about its services, courses, units and qualifications delivered is accurate and factual, regardless of whether the information is provided by the RTO, its brokers, online directories, agents or other third parties. All information clearly distinguishes between non-recognised training and nationally recognised training.
- Pakenham Institute's marketing information will enable informed choice for students by ensuring the information is detailed, accurate and complies with the requirements of the Standards and the National Code.
- All marketing information for nationally recognised training:
  - Identifies Pakenham Institute with its National RTO Code, as well as its CRICOS Code.
  - Will only include the Nationally Recognised Training logo in accordance with its Conditions of Use outlined in Schedule 4 of the Standards.
  - Includes the full name and code of the relevant Training Product whether it is a unit, module, qualification, skill set or accredited course so there is no confusion for students about the outcome.
  - Will be consistent with Pakenham Institute's training and assessment strategies.
  - Include relevant cost information including all costs, any debts that may be occurred, or any loss of entitlement from the student undertaking the course (such as loss of entitlement for further government funded programs or student loan schemes).

### 2. Protection of consumer rights

- By complying with the Standards, Pakenham Institute ensures consumer protection laws are adhered to.
- Pakenham Institute, nor any of its agents or other third parties, will not:
  - Guarantee that a student will be issued with a qualification or statement of attainment.
  - Guarantee any employment outcome as a result of training and/or assessment unless guaranteed employment has been arranged.
  - Guarantee any migration outcome.
  - Guarantee that a student will be automatically accepted into another course.
  - Claim that a student will be eligible for any license or accreditation as a result of training and/or assessment unless it is a license outcome guaranteed by the issuer of the license or accreditation.
  - Draw false or misleading comparisons with other education providers and courses.

- Give any other false or misleading information or advice in relation to itself, its course or outcomes associated with the course.
- Knowingly recruit or seek to enrol an international student before they have completed six months of their principal course of study.
- Prior to enrolment or the commencement of training Pakenham Institute provides to each individual current and accurate information that enables the individual to make informed decisions about undertaking training with Pakenham Institute.
- Course information provided prior to enrolment will provide the individual with detailed information about fees in line with Clause 5.3 of the Standards as well as Standard 2 of the National Code 2018.

### 3. Advertising

- Pakenham Institute’s advertising is always factual and ethical and will not misrepresent Pakenham Institute’s training and assessment, products and other services.

### 4. Marketing permissions

- Pakenham Institute will obtain prior written permission from any person or organisation used as a source of comment, testimonial or picture, for any marketing and/or other material and will always abide by the conditions of that permission

### 5. Review

- Pakenham Institute will undertake annual reviews of all marketing, promotional and advertising materials and promoters (such as agents or other third parties as applicable) to ensure that materials remain current and factual.

## Procedures

### 1. Develop and monitor marketing information

Refer

- SRTOs: Clause 4.1
- National Code: Standard 1

Procedure	Responsibility
<b>A. Develop factual and accurate marketing</b> <ul style="list-style-type: none"> <li>• Refer to Clause 4.1 of the Standards for the requirements that must be adhered to.</li> <li>• Ensure that information included is compliant with the Standards and the National Code.</li> <li>• Ensure marketing materials are approved by the CEO.</li> <li>• Keep a copy of all marketing materials.</li> </ul>	Compliance Manager
<b>B. Monitor marketing information</b> <ul style="list-style-type: none"> <li>• Annually review marketing information to ensure it is accurate. This includes all information that may be existing in the marketplace about Pakenham Institute:               <ul style="list-style-type: none"> <li>– Course Outlines for each course</li> </ul> </li> </ul>	Compliance Manager

Procedure	Responsibility
<ul style="list-style-type: none"> <li>- Website</li> <li>- Advertisements</li> <li>- Student Handbook</li> <li>- Third party information</li> <li>- Information with agents</li> <li>- Marketing Information for third parties delivering services on behalf of the RTO</li> <li>• During the review ensure that the following are met:               <ul style="list-style-type: none"> <li>- Standard 4 of the SRTOs</li> <li>- Standard 1 of the National Code</li> <li>- the policy</li> </ul> </li> <li>• Ensure no misrepresentations have been made, and that there are no inaccuracies in materials. Where information, documents or materials are old or superseded, ensure that they are replaced or repealed as soon as practicable.</li> </ul>	

## 2. Publish student facing policies to the website

Procedure	Responsibility
<p><b>A. Publish policies to the website</b></p> <ul style="list-style-type: none"> <li>• Once approved publish policy wording and definitions to the website for:           <ul style="list-style-type: none"> <li>○ Complaints and Appeals Policy</li> <li>○ Course progress Policy</li> <li>○ Student Support Policy</li> <li>○ International Student Handbook</li> <li>○ Fees and Refunds Policy</li> </ul> </li> </ul>	Compliance Manager
<p><b>B. Update as required</b></p> <ul style="list-style-type: none"> <li>• Whenever the above policies are updated or revised, ensure updated versions are added to the website.</li> <li>• Current students should also be advised in writing (via email or letter) if any of these policies differ from what they accepted prior to enrolment, especially refund policy.</li> </ul>	Compliance Manager

### 3. Pre-enrolment course information/ course outlines

Refer

- SRTOs: Clauses 5.1, 5.2 and 5.3
- National Code: Standard 2 and 3

Procedure	Responsibility
<p><b>A. Develop course outlines</b></p> <ul style="list-style-type: none"> <li>• Refer to Clause 5.2 of the SRTOs and Standard 2 and 3 of the National Code for the requirements that must be included on all course information prior to enrolment or commencement of training, whichever is first.</li> <li>• Information on course outlines should include:               <ul style="list-style-type: none"> <li>– the code, title and currency of the training product to which the student is to be enrolled, as published on the National Register</li> <li>– the training and assessment, and related educational and support services the RTO will provide to the student including the:                   <ul style="list-style-type: none"> <li>– estimated duration</li> <li>– expected locations at which the course will be provided, as well as a general description of facilities, equipment and learning and library resource available to students at each location.</li> <li>– expected modes of delivery</li> <li>– name and contact details of any third party (if applicable) that will provide training and/or assessment, and related educational and support services to the student on the RTO's behalf, and</li> <li>– any work placement arrangements (if applicable).</li> </ul> </li> <li>– the student's obligations:                   <ul style="list-style-type: none"> <li>– any requirements, including visa requirements, that the RTO requires the student to meet to enter and successfully complete their chosen training product, and</li> </ul> </li> </ul> </li> <li>• The following is provided in the Student Handbook:               <ul style="list-style-type: none"> <li>– the RTO's obligations to the student, including that the RTO is responsible for the quality of the training and assessment in compliance with these Standards, and for the issuance of the AQF certification documentation.</li> <li>– the student's rights, including:                   <ul style="list-style-type: none"> <li>– details of the RTO's complaints and appeals process required by Standard 6</li> </ul> </li> </ul> </li> </ul>	<p>Compliance Manager</p>
<p><b>B. Fee information</b></p> <ul style="list-style-type: none"> <li>• Refer to Clause 5.3 of the Standards for the requirements of what fee information must be provided to a student. Include this information for each course on the Course Outline and Student Agreement.</li> <li>• Fee information for international students should include:</li> </ul>	<p>Compliance Manager</p>

Procedure	Responsibility
<ul style="list-style-type: none"> <li>– Details of all fees that must be paid to the RTO and any other fees such as OSHC</li> <li>– Payment terms and conditions, including deposits and refunds</li> <li>– The potential for fees to change during the course as applicable</li> <li>– the learner’s rights as a consumer</li> <li>– the learner’s right to obtain a refund for services not provided by the RTO, being all of the circumstances related to provider default.</li> </ul>	

#### 4. Advertising materials

Refer SRTOs: Clause 4.1

Procedure	Responsibility
<p><b>A. Develop accurate advertising materials</b></p> <ul style="list-style-type: none"> <li>• Ensure that information included in the marketing material is compliant with the Standards.</li> <li>• Ensure advertising materials are approved by CEO.</li> <li>• Keep a copy of all advertising materials.</li> </ul>	Compliance Manager