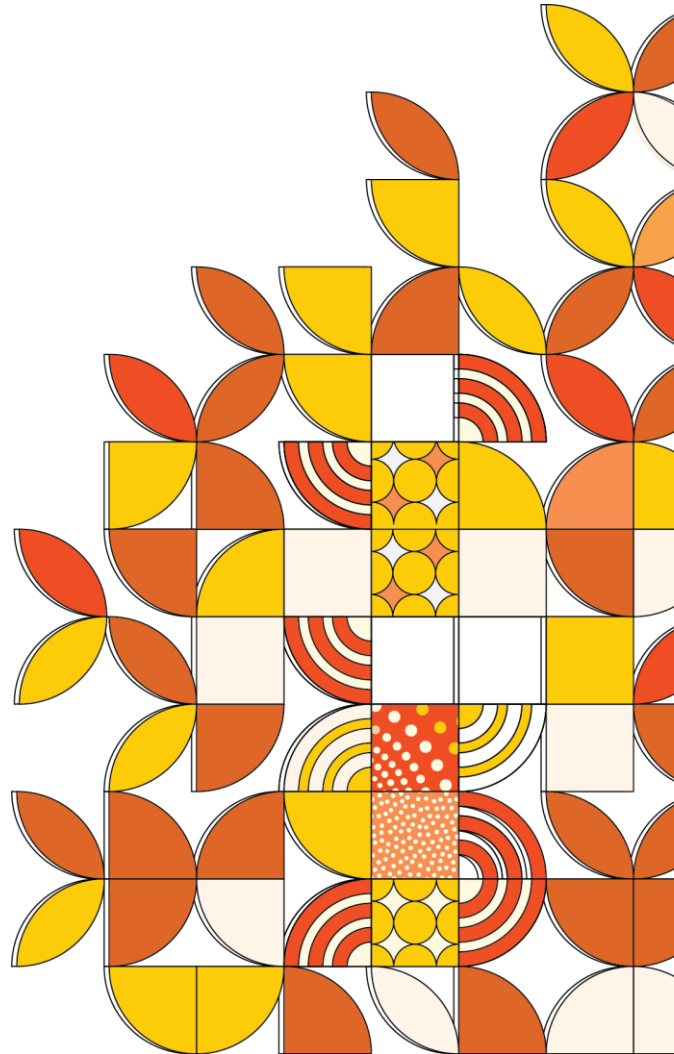


Marketing of Courses to Offshore and Overseas Students Procedure



SECTION 1

Purpose

1. The purpose of this Marketing of Courses to Overseas and Offshore Students Policy and Procedure is to establish clear guidelines for the Institute of Health and Management (IHM Australia) in marketing its courses to international students, in alignment with the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) requirements.
2. This document aims to ensure that IHM complies with the Education Services for Overseas Students Act 2000 (ESOS Act) and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) while providing accurate and transparent information, fair recruitment practices, and comprehensive support services to overseas and offshore students.
3. By adhering to this policy, IHM Australia aims to maintain the highest standards of integrity, accountability, and compliance in its marketing activities, fostering trust and confidence among international students and stakeholders.

Scope

4. This policy applies to all staff members and education agents of IHM Australia who are involved in marketing, communicating about, or developing marketing and communication materials for the purpose of marketing higher education and ELICOS courses to overseas and offshore students. It encompasses all aspects of marketing activities, including but not limited to the following:
 - 4.1. Marketing Strategy and Planning
 - a) Development of marketing strategies and plans targeting international students.
 - b) Identification of target markets and key messaging.
 - c) Selection and utilization of appropriate marketing channels and platforms.
 - 4.2. Marketing Materials and Communication
 - a) Development and review of marketing materials such as brochures, websites, social media content, advertisements, and promotional videos.
 - b) Ensuring accuracy and currency of information presented in marketing materials.
 - c) Compliance with CRICOS regulations, the ESOS Act, and the National Code.
 - d) Translation and localization of marketing materials, if applicable.
 - 4.3. Agent Management and Training
 - a) Selection and management of education agents in compliance with CRICOS requirements.
 - b) Provision of training and support to education agents regarding IHM's courses, admission processes, and student support services.
 - c) Regular monitoring and evaluation of education agents' performance and adherence to CRICOS regulations.

4.4. Fair and Ethical Recruitment Practices

- a) Provision of accurate and comprehensive information to prospective students.
- b) Compliance with non-discriminatory practices during recruitment processes.
- c) Avoidance of misleading or deceptive marketing practices.
- d) Providing support and guidance to students throughout the recruitment and enrolment process, including visa application assistance.

4.5. Complaints and Grievance Handling

- a) Establishment of a transparent and accessible process for handling student complaints and grievances related to marketing activities.
- b) Investigation and resolution of complaints in a fair and timely manner.
- c) Ensuring compliance with CRICOS regulations and providing appropriate remedies if required.

4.6. Record Keeping and Documentation

- a) Maintenance of accurate and up-to-date records related to marketing and recruitment activities.
- b) Retention of records for a minimum period of five years in accordance with CRICOS requirements.
- c) Regular review and update of record-keeping procedures to ensure compliance with regulations and data protection laws.

4.7. Policy Review and Compliance

- a) Regular review of this policy to ensure alignment with CRICOS regulations, the ESOS Act, and the National Code.
- b) Compliance with all relevant legislation, regulations, and guidelines pertaining to marketing to overseas and offshore students.

- 5. This policy applies to all stages of the marketing process, from strategy development to recruitment and support services, to ensure that IHM maintains transparency, integrity, and compliance in its efforts to attract and support overseas and offshore students.

Definitions

- 6. Refer to IHM's [Glossary of Terms](#).

Suite documents

- 7. This procedure is linked to the following documents:

7.1 Marketing of Courses to Offshore and Overseas Students Policy

7.2 Other documents listed in the 'Related Internal Documents' in Section 3 below.

SECTION 2

Responsibilities

8. The implementation of this procedure is the responsibility of IHM Australia. The Head of Marketing and Sales holds the primary responsibility for overseeing and ensuring compliance with this policy. Their specific responsibilities include, but are not limited to, the following:

8.1. Implementation:

- a) Ensuring that all staff members and education agents involved in marketing activities are aware of this policy and understand its requirements.
- b) Facilitating training and guidance to staff members and education agents regarding the implementation of this policy.
- c) Monitoring the implementation of the policy and taking appropriate measures to address any non-compliance.

8.2. Compliance Monitoring:

- a) Regularly reviewing marketing materials, including websites, brochures, advertisements, and social media content, to ensure compliance with CRICOS regulations, the ESOS Act, and the National Code.
- b) Conducting periodic audits and checks to verify adherence to the policy guidelines and standards.
- c) Monitoring the performance of education agents, ensuring their compliance with CRICOS requirements and the guidelines outlined in this policy.

8.3. Stakeholder Engagement:

- a) Collaborating with relevant stakeholders, such as the CRICOS audit team, to ensure the policy's compliance during audits and reviews.
- b) Liaising with internal departments, such as admissions and student services, to coordinate efforts and maintain consistent messaging and practices.

8.4. Policy Updates and Communication:

- a) Keeping abreast of any changes in CRICOS regulations, the ESOS Act, and the National Code that may impact the marketing activities of IHM Australia.
- b) Updating the policy as needed to reflect any regulatory changes and internal requirements.
- c) Communicating the policy updates to relevant staff members and education agents, ensuring their understanding and adherence to the revised guidelines.

8.5. Reporting and Documentation:

- a) Maintaining accurate records related to marketing activities, including marketing materials, agent agreements, student inquiries, complaints, and recruitment processes, as required by CRICOS regulations.
 - b) Generating reports and providing necessary documentation for internal use and for CRICOS audits and reviews.
9. The Head of Marketing and Sales plays a vital role in ensuring that IHM Australia's marketing activities for overseas and offshore students align with CRICOS regulations, the ESOS Act, and the National Code. By assuming responsibility for policy implementation and compliance monitoring, they contribute to maintaining the institute's integrity, transparency, and commitment to providing high-quality education and support services to international students.

Procedure

10. Provision of information prior to enrolment:

10.1. IHM Australia is committed to providing accurate, complete, clear, unambiguous, and up-to-date information to prospective overseas and offshore students, and education agents. This information should meet all applicable legal and regulatory obligations. In accordance with the National Code, the following information will be provided to prospective students:

- a) IHM Australia's CRICOS number, name (Institute of Health and Management Pty Ltd.), addresses, and contact details. These should appear on all marketing materials, including business cards.
- b) Requirements for acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required, and any applicable course credit policies.
- c) Course content, duration, qualification offered (if applicable), modes of study, and assessment methods.
- d) Campus locations and a general description of facilities, equipment, learning resources, and library resources available to students.
- e) Details of any arrangements with other registered providers, individuals, or businesses to provide the course or part of the course.
- f) Indicative course-related fees, including information on the potential for fee changes during the student's course and applicable refund policies.
- g) Information about grounds on which a student's enrolment may be deferred, suspended, or cancelled.
- h) For overseas students, a description of the ESOS framework and relevant information on living in Australia, including indicative costs of living and accommodation options.

- i) Where relevant, information on schooling obligations and options for school-aged dependents of intending students, including the potential for school fees.
- j) Procedures for assessing applicants' qualifications, experience, English language proficiency, and ability to meet entry requirements.

11. Translation of marketing materials for overseas and offshore students

11.1. Where marketing materials or other communication materials are to be provided to prospective students, either directly or through an education agent or media channel, the following procedure will be followed:

- a) An English language version of the materials is drafted and approved in accordance IHM's process.
- b) The English language version is sent to a translator accredited by the National Accreditation Authority for Translators and Interpreters and all text and spoken audio are translated into the target language.
- c) The translated words are incorporated into a new draft version of the marketing material.
- d) Consultation is undertaken with regard to the cultural appropriateness of any non-textual element of the materials and any forthcoming recommendations are implemented.
- e) A final approved version is published.

11.2. Conducting an initial discussion with a prospective overseas or offshore student or group of prospective overseas or offshore students

11.3. Where an education agent or representative of IHM Australia engages in an initial discussion with prospective overseas or offshore students regarding their study options with IHM Australia, the following procedure will be followed, regardless of what communication medium is used:

- a) The education agent or representative thanks the prospective students for their interest in study with IHM and greets them as appropriate.
- b) The education agent asks open questions to ascertain the nature of the prospective student's interest in study with IHM Australia and determines whether the course(s) offered is (are) appropriate to their needs and only proceeds beyond this step if this is confirmed.
- c) The education agent or representative describes the (most appropriate) course(s) of study and offers the prospective student all of the information set out in the principle of provision of information prior to enrolment as set out in this document. The student may choose to receive this information in either print or electronic form and may seek any additional information or clarification.
- d) The prospective student is offered time to peruse the information before making a decision and invited to ask any further questions, having been informed of the cut-off date for applications for the soonest intake and.

- e) If the prospective student determines in the affirmative, the education agent or representative offers the student assistance in completing the procedures for application and enrolment.

12. Provision and updating of marketing materials provided to overseas education agents.

12.1. Marketing and communication materials will be provided to education agents involved in the marketing of courses to prospective overseas and offshore students and will be kept up to date and complete in accordance with the following procedure:

- a) Marketing and communication material is developed and approved in accordance with relevant regulations.
- b) Marketing and communication material is translated, if applicable, in accordance with the procedure for translation of marketing materials for overseas and offshore students, set out in this document.
- c) Marketing and communication material is sent to the education agent both electronically and in hard copy.
- d) The relevant IHM Australia responsible person contacts the education agent and asks the education agent to confirm the provision of all required materials, item by item, marking each requirement in the applicable section of an Agent Information Pack Checklist.
- e) The relevant IHM Australia responsible person arranges for the provision of any items that are missing, fills in the date field, both parties sign the checklist, and it is added to the education agent's file.
- f) As subsequent versions of each marketing material are developed, the above steps are repeated for each new version and notes the new version numbers on the education agent's file.

SECTION 3

Associated Information

Related Internal Documents	<ul style="list-style-type: none"> • Marketing of Courses to Offshore and Overseas Students Policy • Agents Appointment, Monitoring and Management Policy • Agents Appointment, Monitoring and Management Procedure • Education Agent Information Pack Checklist
Related Legislation, Standards and Codes	<ul style="list-style-type: none"> • National Code of Practice for Providers of Education and Training to Overseas Students 2018 • Education Services for Overseas Students Act 2000 • Competition and Consumer Act 2010 • Freedom of Information Act 1982 • Privacy Act 1988 • Information Privacy Act 2000 (VIC) • Privacy and Personal Information Protection Act 1998 (NSW)
Date Approved	16/08/2023
Date Endorsed	21/08/2023
Date of Effect	21/08/2023

Date of Next Review	31/07/2026
Approval Authority	Executive Management Committee (endorsed by Board of Directors)
Responsibility for implementation	Head of Marketing and Sales
Document Custodian	Head of Marketing and Sales
Responsible Department	Marketing Department
IHM Doc ID	IHM-MCOSP2-2.1

Change History

Version Control		Version 2.1
Change Summary	Date	Short description of change, incl version number, changes, who considered, approved etc
Version 1.0	26/07/2021	<ul style="list-style-type: none"> • Separation of Policy and Procedure into separate documents in current template • Formatting and minor editing
Version 2.0	14/08/2023	<ul style="list-style-type: none"> • Substantive revision in the template on account of change in Logo and formal alignment.
Version 2.1	13/11/2023	<ul style="list-style-type: none"> • Transfer into new template • Minor change • Definitions removed as now refer to IHM Glossary • Explicit mention of both Higher Education and ELICOS courses in the Scope • Inclusion of CRICOS course codes to be mentioned in all marketing materials