

Marketing Policy and Procedure



Distribution	All staff and any third parties or brokers
Skills First References	2024-25 Standard VET Funding Contract Skills First Program Schedule 1 - Clauses 1.1, 1.2, 1.3
Skills First Quality Charter Principles	Principle 3 – Informed Choice
ASQA References	Outcome Standards for RTOs 2025 - Outcome 2 - Standard 2.1 Compliance Standards for RTOs 2025 and Fit and Proper Person Requirements – Schedule 2— Nationally Recognised Training Logo Conditions of Use Policy Standard
Legislative Context	Education and Training Reform Act 2006 (Victoria) Victorian Guidelines for VET Providers (Victoria) Privacy Act 1988 (Commonwealth) Information Privacy Act 2000 (Victoria) Trade Practices legislation and regulations Australian Consumer Law (Competition and Consumer Act 2010)
Related Documents	Third Party Policy and Procedure Marketing Register ACIR Register



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1. Policy

VFA Learning (TOID: 22360) must ensure its marketing and advertising of AQF and VET qualifications to prospective clients is ethical, accurate and consistent with its Scope of Registration. VFA Learning will:

- Market and advertise its products and services in an ethical, factual, accurate and clear manner;
- Market its products and services with integrity, and professionalism to avoid vague and ambiguous statements;
- Market its products and services to safeguard the interests and welfare of all clients and students;
- Not guarantee that a student will complete a training product on its Scope of Registration;
- Operate in accordance with the national protocol for marketing and advertising;
- Ensure the NRT logo is used to promote and certify National Vocational Education and Training leading to AQF qualifications or Statements of Attainment and is used only in accordance with its conditions of use (refer to the use of NRT logo process).

2. Purpose

VFA Learning provides accurate, factual and ethical information in its marketing and promotional materials. VFA Learning ensures all marketing materials developed are authorised and checked for compliance prior to being placed into circulation.

3. Scope

This policy applies to all VFA Learning staff that produce, publish and distribute marketing materials in print, electronic or internet medium and disseminate information for the purpose of recruiting students in Australia.

4. Definitions

Australian Qualifications Framework (AQF) is the framework for regulated qualifications in the Australian education and training system, as agreed by the Commonwealth, State and Territory ministerial council with responsibility for higher education.

Marketing Materials relates to all materials that promote VFA Learning and its registered courses including but not limited to: course flyer, brochure, pamphlet, website, student information pack, banner, poster, social media and advertisements.

Mode of delivery is the method adopted to deliver training and assessment, including face-to-face, online, distance, or blended methods.

Nationally Recognised Training (NRT) Logo is the logo used nationally to signify training packages and VET accredited courses.

Scope of registration refers to the training products for which an RTO is registered to issue AQF certification documentation. It allows the RTO to:

- both provide training delivery and assessment resulting in the issuance of AQF certification documentation by the RTO; and
- provide assessment resulting in the issuance of AQF certification documentation by the RTO.

Student is an active, on-campus student with a current course of enrolment with VFA Learning.

Third party is any party that provides services on behalf of the RTO but does not include a contract of employment between an RTO and its employee.

Training Product is the AQF qualification, skill set, unit of competency, accredited short course and module.

5. Requirements, Process & Procedures

VFA Learning ensures that they are meeting the standards relating to marketing and providing accurate information in all marketing material, regardless of the channel or method used, such as:

- Advertising – (newspaper, radio, television)
- Course flyers or other hard copy publications
- Websites – including VFA Learning’s own website and any other sites where VFA Learning is referred to
- Social media (Facebook, Twitter, LinkedIn, YouTube, Instagram)
- Online Directories (Yellow pages, True Local)
- Online Advertisements (Google AdWords), and
- Any marketing by third parties that relates to VFA Learning or to any training and assessment that VFA Learning provides.

The following procedure ensures accuracy and integrity of all marketing and promotional materials representing VFA Learning. It ensures all marketing materials and practices on behalf of VFA Learning are authorised by an appropriate person before implementation.

Step 1: Identify the need for marketing material.

- CEO / Operations Manager identify the need for new marketing materials and develop the brief.
- This information is then be forwarded to the marketing team.
- Pricing and approval for spend is finalised.
- Approving the marketing material from a financial perspective, a needs perspective and a compliance and quality perspective

Step 2: Generating new marketing materials.

- The Marketing team is to use existing templates to create draft marketing material(s) following the style guide.
- The Marketing team is to ensure the draft(s) comply with the ASQA standards, funding body, VET Student Loans and Australian Consumer Law
- The Marketing team is to email draft to the CEO, Data Quality and Compliance Manager, Operations Manager or nominated delegate for approval.

Step 3: Review of new marketing materials.

- The Data, Quality and Compliance Manager is responsible for ensuring all marketing information and practices are conducted in a professional manner and maintain the integrity and reputation of the industry and registered providers.
- The Data, Quality and Compliance Manager will review the marketing material and will seek feedback from the Operations Manager, Content Developer and Enrolment Officer.
- Any changes required will be communicated with the Marketing team.

Step 4: Approval of marketing material

- Once approved the marketing material may be distributed by the Marketing team and all relevant staff are to be notified.
- The Marketing team will upload the new material to the Marketing Collateral folder on VFA Learning's SharePoint.

Step 5: Documenting marketing material

- The Marketing team is to document the details of the marketing material in the marketing register.
- The CEO or nominated delegate will conduct an annual review of all RTO marketing materials or during an Internal Audit when applicable

Authorising of Marketing Material

1. In authorising the marketing/promotional material, the Data, Quality and Compliance Manager shall ensure:
 - a. All marketing and advertising products, including electronic advertising, contain VFA Learning's TOID;
 - b. All marketing material does not have false or misleading information to be present within any documents or information developed by VFA Learning;
 - c. All marketing material must accurately represent the course/s being advertised;
 - d. All marketing material includes the title and code of any training product, as published on the www.training.gov.au
 - e. Only current training products on VFA Learning's Scope of Registration are advertised;
 - f. That if the marketing material is for domestic students, that it acknowledges in a prominent way that the training services are provided to eligible students with funds made available by the appropriate Government authority;
 - g. All marketing material includes any details about financial support arrangements associated with the provision of training and assessment, if relevant;
 - h. All marketing material distinguishes between nationally recognised training and assessment leading to the issuance of AQF Certification documentation from any other training or assessment delivered;
 - i. Marketing material does not use any logo or trademarks of State or Departments without prior written approval of the State or the Departments;
 - j. That all marketing materials meet the requirements of the Equal Opportunity Act 2010 and related laws, including the provision of materials encouraging individuals with disabilities to access Government subsidised training;
 - k. Marketing and advertising of the training services to prospective students is ethical, accurate and consistent with the requirements under legislation;
 - l. The material does not guarantee that a student will complete a training product on VFA Learning's Scope of Registration, or the training product can be completed in a manner that does not meet the requirements of all Standards/Contracts;

- n. That material does not guarantee that a student will obtain a particular employment outcome where this is outside the control of VFA Learning;
 - o. Where applicable all marketing material clearly includes details about any government-funded subsidy or other financial support associated with the RTO's provision of training and assessment, including details about debts the students will incur, and how those debts will be repaid;
 - p. Where applicable, funding eligibility criteria is appropriately determined and communicated to all marketing personnel and agents;
 - q. All marketing personnel, internal and external, and Education Agents understand that NO INCENTIVES are offered to any students for applying or enrolling in a course. All Third-Party Agreements to reflect the same;
 - r. For domestic students, all prospective students are made aware in circumstances where they are accessing their Skills First Program entitlement that this may impact their access to further government subsidised training.
- Third Parties are required to seek approval from VFA Learning for any marketing and advertising to be done on behalf of VFA Learning. In this instance, marketing material will be provided to the third party by VFA Learning, which clearly states the role of the third party as recruiting prospective learners on behalf of VFA Learning and states clearly that VFA Learning would be the education provider.
 - VFA Learning will only advertise their courses in English.

Marketing and government-funded subsidies

Where the course being offered is under a funding subsidy; or is offered with other financial support arrangements, details must be included about:

- a. the applicable government loan or subsidy, for example, Skills First Funding;
- b. the debt incurred by the learner, payments to be made, interest and other charges that may be incurred; and
- c. any loss of entitlement that may occur as a result of a learner undertaking a course associated with a funding subsidy (for example, where learners are only able to access one course through a particular funding subsidy or there are restrictions on what courses may be subsidised after a learner completes their study with VFA Learning).

The Nationally Recognised Training Logo

1. The Nationally Recognised Training (NRT) logo is a distinguishable mark of quality for promoting and certifying national Vocational Education and Training leading to Australian Qualifications Framework (AQF) qualifications or Statements of Attainment.
2. The NRT logo will only be used by VFA Learning once authorised to do so.
3. Where VFA Learning will reproduce the NRT logo in colour, it will comply with the colour requirements. Two colour reproduction uses:
 - **GREEN PMS 343**



- **RED PMS 192**
- 4. Where VFA Learning uses the NRT logo reproduced in one colour, it will reproduce the NRT Logo in Green PMS 343 or, it will be reproduced in black.
- 5. ASQA has sent VFA Learning, all of the approved NRT Logos. These have been saved on SharePoint-Dropbox under the Marketing folder.
- 6. VFA Learning acknowledges its obligations in ensuring the correct use of National and State training logos.
- 7. VFA Learning ensures it complies with the Conditions for Usage of National and State training logos, as specified in:
 - Compliance Standards for RTOs 2025 and Fit and Proper Person Requirements – Schedule 2— Nationally Recognised Training Logo Conditions of Use Policy Standard

Maintaining the Victorian Skills Gateway

1. The Data, Quality and Compliance Manager is responsible for maintaining an up to date profile on the Victorian Skills Gateway (VSG).
2. The details on the VSG will be reviewed on a monthly basis
3. Any changes made will be recorded on the ACIR Register

VET Student Loan Program

1. VFA Learning is committed to meeting all marketing and advertising requirements as outlined in the Commonwealth's *VET Student Loans (VSL) Program Act 2016* and the accompanying *VSL Program Rules (2016)*.
2. VFA Learning only markets and advertises qualifications under the VSL that it has been approved to deliver by the Commonwealth government.
3. VFA Learning does not market an approved course unless:
 - a. the course tuition fees including specifying the VSL covered fees (ie. the level of student fee that will be covered through the VSL) for each of its approved courses on its website in a readily accessible place.
 - b. have been given to the Secretary in accordance with section 115.
4. VFA learning publishes the census days determined for a course, or a part of a course, before the earliest day for enrolment in the course or part of the course, enabling students to access information about the census date before they enrol. This information will be in an easily accessible location displayed on the homepage header under VET STUDENT LOANS on VFA Learning's Website which does not require login information.
5. VFA Learning does not offer or provide any benefit to a prospective student nor causes a benefit to be offered or provided where the benefit would be reasonably likely to induce the potential student to apply for a VET Student Loan for a VFA Learning course.
6. VFA Learning does not use cold-calling marketing strategies nor employs another person to market, advertise or promote a course, nor mentions the possible availability of a VET Student Loan for students undertaking the course in any of its marketing and advertising strategies.

7. VFA Learning does not use third party referral nor third party contact lists as part of its marketing and advertising strategies.
8. VFA Learning determines the date or dates for the course by which a student's enrolment in the course can be cancelled without the student incurring tuition fees for the course or a part of the course, known as the census day(s). The census day(s) are published on VFA Learning's relevant course promotional material and are not varied.
9. VFA Learning posts all relevant policies and procedures on its website in an easy to access position.
10. VFA Learning's VSL marketing and advertising material prominently mentions:
 - a. its name and its registered business name;
 - b. the provider's registration code;
 - c. all tuition and covered fees and charges;
 - d. statements that VET Student Loans will not be approved for students who do not meet eligibility requirements and that a VET Student Loan gives rise to a HELP debt that continues to be a debt due to the Commonwealth until it is repaid.
11. VFA Learning's VSL marketing and advertising material prominently presents:
 - a. the information covered above in 4.9. in a font size that is approximately the same as any other marketing information that accompanies it;
 - b. on the same webpage as the other marketing of the course in its web presence.
 - c. the marketing using the VET Student Loans logo—presents the logo in accordance with the style guide for the use of the logo published on the Department's website.
12. Marketing through social media: VFA Learning ensures that any marketing of the provider or its courses through social media does not mention the possible availability of a VET Student Loan (however described) for students undertaking a course.

Marketing information

VFA Learning's marketing information to include, but not limited to:

- Company Name and RTO Code
- NRT Logo (where applicable)
- Full Code and title of training product including
- Units of competency
- Length of training including breaks
- Mode/s of delivery
- Training location
- Third party arrangements
- Entry requirements
- Support services provided
- Funding entitlements / information

8. Responsibility

The Data, Quality and Compliance Manager is responsible for effective implementation and management of this policy as well as provision of information on ways to resolve complaints of breaches of this policy.

VFA Learning’s CEO has the overall responsibility for final approval and review of this policy.

Any complaints or breaches in relation to this policy should be reported to the Data, Quality and Compliance Manager in person or by email to: privacy@vflearning.vic.edu.au

9. Review Date

12 months from the date of this version, or as required.

10. Major Version History

Version Number	Date	Reason for change	Prepared By	Approved By
1	2019	Updated policy to reflect the current practices.	Angie Morgan (Head of Compliance)	Glenn Hanegraaf (Director)
2	2020	Updated policy to reflect the current practices.	Angie Morgan (Head of Compliance)	Glenn Hanegraaf (Director)
3	13.2.2021	Included greater detail about NRT Logo use	Angie Morgan (Head of Compliance)	Glenn Hanegraaf (Director)
4	10.1.2022	Updated to reflect Marketing process changes and file references	Pierrin Vogeli (Compliance Manager)	Justin Healy (State Manager)
5	5.1.2023	Formatting changes. Updated references to 2023 Contract	Pierrin Vogeli (Compliance Manager)	Emily Sicura (General Manager)
6	13.12.2023	Updated to reflect 2024-2025 Skills First Contract. Addition of Skills Gateway requirements.	Miranda Biamis (National Compliance Manager)	Emily Sicura (General Manager)
7	20.4.2024	Changed logo to remove CRICOS registration number and any reference to CRICOS requirements	Nicola Weber (Quality and Compliance Leader)	Emily Sicura (General Manager)
8	1.7.2025	Change of staff position titles, change of reference for revised Standards for RTOs 2025. Addition of register for updating Skills Gateway.	Nicola Weber (Data, Quality and Compliance Manager)	Rathini Sonnadara (CEO)