

## Marketing Policy

*Effective Date: 2025.04.15*

*Last Reviewed: [Date] N/A – new policy*

*Version Number: v1 2025.04.15*

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### 1. Purpose

The purpose of this policy is to ensure the marketing practices of Alphacrucis (AC) University College, its partners and third parties are ethical, accurate, comply with regulatory requirements and maintain consistency with AC's brand.

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### 2. Scope

This policy applies to AC staff, partners and third-party partners engaged in marketing, promotion, and recruitment activities on behalf of AC.

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### 3. Definitions

For the purpose of this policy, the following definitions apply:

- 3.1. **Marketing:** Marketing refers to the strategies and activities used by AC to promote its brand and courses, attract students, and engage stakeholders. It involves communicating the value of educational offerings to prospective students and other key audiences through various channels, including print, digital media, events, and partnerships.
- 3.2. **Recruitment:** Recruitment refers to the process of attracting and enrolling students into an AC program. It involves identifying potential candidates, promoting AC's offerings, and guiding prospective students through the application and admission process.
- 3.3. **Third party:** An education provider external to AC that delivers courses on behalf of AC via a contractual agreement with AC.
- 3.4. **Partners:** An organisation, company or individual external to AC that engages with a contractual agreement with AC (e.g., Education Agent) and promotes AC courses to prospective students on behalf of AC.
- 3.5. **Brand:** Brand refers to the AC brand, which is the unique identity and perception of AC, shaped by AC values, reputation, visual elements (such as logos and design), and student experience. It represents how AC is recognised and perceived by its audience.

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### 4. Policy Statement

#### 4.1. Integrity and Accuracy

- 4.1.1. All marketing and promotional materials must provide truthful and accurate information regarding AC's programs, accreditation and affiliations, avoiding misleading statements.
- 4.1.2. Information must be aligned with AC's registration and compliance standards including accreditation, course outcomes, and institutional affiliations.

#### **4.2. Ethical Marketing Practices**

- 4.2.1. Marketing activities and practices must adhere to all relevant legislation (refer to Item 8 of this policy).
- 4.2.2. All marketing and promotional activities, direct or indirect, must represent AC and its course(s) in an accurate, ethical manner that is not misleading.
- 4.2.3. AC, its education agents, third parties and partners must not provide false or misleading claims about:
  - a) Employment or licencing outcomes from courses.
  - b) Migration opportunities and outcomes.
  - c) Automatic progression into higher AQF courses or partner institutions.
  - d) Payment or loan options, including FEE-HELP or VET Student Loans.
  - e) AC's association with other persons or organisations.
  - f) Any course specific requirements, such as work-based training, and prerequisites (including English language proficiency).

#### **4.3. Collaboration with Partners**

- 4.3.1. AC will engage education partners through written and signed partnership agreements.
- 4.3.2. Agreements must include clear roles, marketing monitoring and review procedures, and corrective action protocols.
- 4.3.3. Regular monitoring and review will ensure partner practices remain ethical and aligned with AC's standards.

#### **4.4. Third-Party Partnerships and Pathway Agreements**

- 4.4.1. All promotional materials and communications created by third-party institutions or partners must accurately represent the contractual agreement and nature of the partnership.
- 4.4.2. Pathway programs must be marketed transparently, outlining clear entry requirements, progression pathways, fees, and benefits to students.
- 4.4.3. AC will work collaboratively with partner institutions to ensure consistent messaging and compliance with relevant regulatory frameworks.

#### **4.5. Branding and Communication**

- 4.5.1. Partners and third parties must credit AC on all marketing material that promotes any accredited courses or qualifications offered through AC accreditation.
- 4.5.2. AC's CRICOS registered name and provider code, RTO Code and TEQSA provider ID should appear in all AC written and electronic publications, materials and correspondence which may be viewed by a prospective international student, or the material must indicate is not intended for use by international student.
- 4.5.3. Promotion of VET programs must ensure that the national code and title of relevant training products, as they appear on the National Register, are clearly displayed. Only VET programs that are on AC's s Scope of Registration can be promoted.
- 4.5.4. Any course offered by AC and/or its Third Parties that is available to international students must also have a valid CRICOS code before it can be promoted. The relevant

course CRICOS code must be published in any promotional communications which may be accessed by international students. This requirement applies to all promotional activities (e.g., any printed materials, digital media, social media platforms etc.).

- 4.5.5. If CRICOS registration has been applied for and has not yet been received, then a course must not be promoted or published until AC has been advised that CRICOS registration has been approved and a formal communication has been issued to AC staff and any relevant AC Third Parties and Partners.
- 4.5.6. AC's branding, including logos and taglines, must be used appropriately and in accordance with AC's brand guidelines and licensing conditions. 4.5.2 Advertising materials should reflect AC's identity as a leading Christian University College and, where required, reference the relevant parts of AC's institutional registration and accreditation status, which can be found here.

#### 4.6. Monitoring and Compliance

- 4.6.1. Due to regulatory requirements for promoting accredited courses or qualifications, all promotional material needs to be sent to the relevant AC marketing officer, compliance officer, or contact person for approval before publication. This includes, but is not limited to, materials such as flyers, prospectus, websites, and videos.
- 4.6.2. Third-party partners and pathway providers will be monitored through regular meetings, student feedback, and data on applications and enrolments.
- 4.6.3. Any suspected breaches in policy must be reported promptly to the Chief Marketing Officer. Violations will be addressed in accordance with regulatory requirements and breaches could potentially result in the cancellation of the partnership agreement.

#### 4.7. Prohibited Activities

- 4.7.1. AC prohibits the marketing of credit cards or similar financial products to students through campus events, displays, or free merchandise incentives.
- 4.7.2. Recruitment of students currently enrolled at another provider is prohibited unless students initiate the application independently.

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### 5. Roles and Responsibilities

The following roles and responsibilities apply in relation to this policy:

- 5.1. **Chief Marketing Officer:** The Chief Marketing Officer is responsible for ensuring compliance of marketing and promotional activities with this policy and regulatory requirements through ongoing monitoring and review of marketing practices.
- 5.2. **AC Marketing Officers and Managers:** Any staff involved in marketing and/or promotional activities must ensure compliance with the principles and procedures as set out in this policy and in relation to their respective roles.
- 5.3. **AC Partner Liaison / Manager:** While the Chief Marketing Officer owns this policy, the relevant AC partner liaison or manager is also jointly responsible for ensuring partner awareness and compliance with this policy. This includes undertaking the following, in consultation with the Chief Marketing Officer:
  - a) Monitoring marketing activities and partner performance.

- b) Conducting annual reviews to ensure compliance with regulatory requirements, industry standards and institutional goals.

- 5.4. **Third Parties / Partners:** Third Parties and/or Partners are responsible for ensuring compliance with this policy, and seeking any necessary advice and/or training from their AC partner managers and liaison where necessary.
- 5.5. **Executive Management Team:** The Executive Management Team is responsible for the approval of marketing and promotional material prior to publication.

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## 6. Procedures

- 6.1. All requests for marketing and promotional activities are submitted to the Marketing Department via Marketing@ac.edu.au.
- 6.2. The Chief Marketing Officer will assess the request and, if approved, assign the project to a Marketing Officer.
- 6.3. The Chief Marketing Officer will review the draft marketing or promotional material. The Quality and Standards Department may be consulted in the approval process, as and when required. If approved, the material will be forwarded to the Executive for final approval.
- 6.4. Upon Executive approval, the Chief Marketing Officer will publish the material on the appropriate platforms for the duration of the campaign.

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## 7. Responsible for implementation

- 7.1. Chief Marketing Officer
- 7.2. AC Partner Liaison / Manager
- 7.3. AC Third Parties / Partners

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## 8. Related AC Policies or Documents, Standards and Legislations

### 8.1. AC Policies or Documents

- 8.1.1. Admissions Policy
- 8.1.2. Higher Education Third Party Arrangement Selection and Approval Policy
- 8.1.3. Higher Education Third Party Arrangement Implementation and Administration Policy
- 8.1.4. VET Third Party Arrangement Policy
- 8.1.5. Education Agent Management Policy
- 8.1.6. Brand Guidelines

### 8.2. Relevant Standards and Legislations

- 8.2.1. Higher Education Standards Framework
- 8.2.2. Federal Register of Legislation - Standards for Registered Training Organisations (RTOs) 2015 (please note that the Standards for RTO's 2015 will be replaced by the following as of 01/07/2025: National Vocational Education and Training Regulator (Outcome Standards for Registered Training Organisations) Instrument 2025, National Vocational Education and Training Regulator (Compliance Standards for NVR Registered Training Organisations and Fit and Proper Person Requirements) Instrument 2025)
- 8.2.3. Education Services for Overseas Students Act 2000 (ESOS Act)

- 8.2.4. The National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018);
- 8.2.5. Immigration (Education) Act 1971
- 8.2.6. The Australian International Education and Training Agent Code of Ethics
- 8.2.7. The Privacy Act 1988
- 8.2.8. Copyright Act 1968
- 8.2.9. Competition and Consumer Act 2010
- 8.2.10. Spam Act 2003

## 9. Review and Revision

This policy will be reviewed by the Chief Marketing Officer on a regular basis in accordance with the Policy Development and Review Policy. Any proposed changes will be tabled at the approving committee for review. Revisions will be communicated to all relevant stakeholders upon approval.

## 10. History of approval and amendments

Policy owner	Chief Marketing Officer
Policy category	Management: Executive
Policy status	Approved
Approval Body	Chair, Executive Committee
Endorsement Body	Executive
Approval Date	15 April 2025
Last Review Date	25 March 2025
History of Policy Amendments	
V1 2025.04.15	The previous Marketing Policy focused mostly on agent management and was subsequently changed into a new Education Agent Management Policy. This created a gap and the need to develop a policy with specific focus on marketing activities. Subsequently, this new Marketing Policy has been developed in order to address any gaps and ensure that marketing activities are conducted in accordance with the guiding principles set out in this policy and regulatory requirements.

*Add a new row for each version of the policy. Do not remove previous changes.*

**Appendices**

- N/A

