

Policy area	Student Support
Standards	Compliance Standards for RTOs for RTOs, Standard 7 and 8 Outcome Standards for RTOs, Standard 2.1
Relates to	Chief Executive Officer, Office Manager, Administrative staff
Classification	Internal Only

1. Purpose

The purpose of this policy and procedure is to ensure:

- marketing and advertising of training products to prospective students is clear, accurate, current and consistent with Blue Cross First Aid Institute scope of registration
- marketing and advertising is subject to quality control and quality review as part of the Blue Cross First Aid Institute self-assurance arrangements
- staff comply with the conditions of use for the Nationally Recognised Training (NRT) logo

2. Definitions

Training product means AQF qualification, skill set, unit of competency, accredited short course and module.

3. Policy statement

3.1 Advertisements and promotional information

Advertisements and promotional material used by Blue Cross First Aid Institute must uphold the integrity and reputation of Australia's education industry by ensuring the marketing of courses and services is not false or misleading. This is applicable for marketing that is used both domestically and internationally. The following guidelines are to be followed when preparing advertisements and promotional information.

Blue Cross First Aid Institute will ensure that any advertising and marketing material or information disseminated by Blue Cross First Aid Institute or on our behalf by partner organisations meets the Compliance Standards for RTOs for RTOs, including:

- a) include or provide links to our RTO code and the code and title of any training product, as published on the National Register;
- b) identify Blue Cross First Aid Institute by name and official branding in any marketing material;
- c) accurately represent the services we provide and the training products on our scope of registration, and only advertise or market a training product that is no longer current while it remains on scope and new enrolments are permitted;
- d) make clear where services are being delivered by a third party on our behalf, including distinguishing where:
 - i) a third party is recruiting prospective VET students on our behalf
 - ii) a third party is delivering training and assessment on our behalf
- e) another RTO is delivering training and assessment on behalf of Blue Cross First Aid Institute distinguish between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by Blue Cross First Aid Institute;
- f) only advertise or market that a training product we deliver which will enable VET students to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- g) include details about any VET Student Loans, government funded subsidy or other financial support arrangements associated with our provision of training and assessment;
- h) only refer to or imply a connection with another person or organisation in our advertising and marketing material if the consent of that person or organisation has been obtained; and
- i) only use the NRT logo in accordance with Schedule 2 of the Compliance Standards for RTOs for RTOs.

Blue Cross First Aid Institute must not guarantee, verbally or in writing, that:

- a) a VET student will successfully complete a training product on its scope of registration
- b) a training product can be completed in a manner which does not meet the requirements of the Standards

- c) a VET student will obtain a particular employment outcome where this is outside the control of the RTO.

In addition, Blue Cross First Aid Institute must not:

- integrate or confuse in any way training that is nationally recognised with other training that is not accredited;
- provide approval for any third-party organisation to advertise on behalf of Blue Cross First Aid Institute unless it is appropriately specified with limitations within a written and signed agreement with the third party organisation;

3.2 Use of the NRT Logo

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) certification documentation.

The NRT Logo will only be used in accordance with the Compliance Standards for RTOs, Schedule 2 – Nationally Recognised Training Logo conditions of use policy. The following principles are to be followed when considering incorporating the NRT Logo in any advertising or marketing material:

- i. the NRT Logo may only be used to promote nationally recognised training products that are held on the Blue Cross First Aid Institute scope of registration (implicit or explicit);
- ii. the NRT Logo may only be displayed where there is a direct relationship to a training product described using the code and title as published on the National Register;
- iii. the NRT Logo must not be used in a way that creates misleading impressions or confusion with non-accredited training;
- iv. The NRT Logo can only be reproduced from electronic copies provided by the National VET Regulator;
- v. The NRT logo is a registered Trademark and consists of both the triangular shape and the descriptor “Nationally Recognised Training”. The triangle is not to be used without the descriptor. The typeface is Fritz Quadrata. Under no circumstances is the descriptor to be typeset in any other typeface;
- vi. The complete NRT Logo may be varied in size and position. Although the size of the logo may be varied, the proportions of the triangle and the descriptor in relation to each other

may not be varied. Under no circumstance is the logo to be reproduced in mirror image or be rotated;

- vii. Where the NRT Logo is reproduced in colour, it must comply with the following colour requirements. Deviation from these colours is not permitted, nor are colours to be swapped around or stippled. The only colours to be used are:

GREEN PMS 343

RED PMS 192

- viii. Where the NRT Logo is reproduced in one colour, it should preferably be in **GREEN PMS 343** or, where this is not suitable, it may be reproduced in black. In some situations, the background colour may clash or the logo may not be prominent. In those situations, the black logo may be reversed out to display in white,

- ix. The following are examples of logo reproduction



- x. The NRT Logo must not be used on products such as corporate stationery, business cards, building signage, motor vehicle signs or wraps, merchandise and marketing products such as mouse pads, pens, satchels, mugs, USB sticks, or packaging around products, or displayed in learning and assessment resources. This includes materials such as PowerPoint presentations, student guides, assessment tools, etc.

3.3 Marketing non-accredited training

When Blue Cross First Aid Institute is promoting the non-accredited training, it will clearly distinguish between nationally recognised training and that which is not nationally recognised. Practices where nationally endorsed and non-accredited training are combined within a brochure, or a website are to be avoided. Ideally it is best to separate these course offerings into different areas of our website to make a clear distinction.

3.4 Delivery of standalone units of competency

Where Blue Cross First Aid Institute has qualifications on its scope of registration, the core units of competency and the listed (named) elective units of competency may be offered and delivered as standalone units of competency. This means that whilst these units of competency are not individually listed on the Blue Cross First Aid Institute scope of registration, they are “implicit” on the scope of registration and are approved by ASQA for delivery as standalone units. To be clear, Blue Cross First Aid Institute does not need to seek approval for the delivery of these units of competency. Blue Cross First Aid Institute is entitled to publish advertising that promotes these standalone units of competency as individual courses.

3.5 Encouraging participation in training from under-represented groups

Information on our website and in Course Brochures is to encourage students from under-represented groups (including people with disability and First Nations people) to apply for enrolment in our training products. Blue Cross First Aid Institute is committed to fostering an inclusive and culturally safe learning environment where all students can engage fully in their educational journey. It is important in our marketing and advertising that we strive to communicate this. The following are some strategies to consider employing in Blue Cross First Aid Institute Emarketing to ensure it is culturally safe and invites enrolments from under-represented groups:

– Visual Representation and Design:

- Partner with First Nations artists and artists with disability for marketing materials, ensuring authentic representation and proper attribution;
- Use diverse photography showing First Nations people and people with disability in active, empowered roles;
- Ensure marketing materials demonstrate accessibility features of your facilities;
- Include representation of various types of disability, avoiding stereotypes;
- Show diverse age groups and intersectional identities; and
- Ensure all digital marketing materials are screen-reader friendly with appropriate text.

– Language and Communication:

- Use inclusive, respectful language that acknowledges both Traditional Custodians and disability inclusion;
- Avoid inspiration-focused narratives around disability;

- Provide materials in multiple accessible formats (audio, large print, Easy English, Braille);
- Consider incorporating local Indigenous languages with proper consultation;
- Highlight First Nations and disability support staff who are willing to be contact points;
- Use person-first and identity-first language appropriately based on community preferences; and
- Ensure all video content includes captions and Auslan interpretation where appropriate.

– **Community Engagement:**

- Build relationships with both First Nations communities and disability organisations;
- Partner with Indigenous organisations and disability advocacy groups;
- Attend community events, career fairs, and disability expo events;
- Work with student ambassadors from both communities to share experiences; and
- Consult with First Nations Elders and disability advocates about appropriate engagement strategies.

– **Support Services and Access:**

- Clearly communicate available support services for under-represented groups;
- Highlight physical accessibility features of your facilities;
- Detail cultural support services and programs;
- Showcase assistive technology available;
- Outline flexible learning options and adjustment procedures; and
- Emphasise your commitment to both cultural safety and accessibility.

– **Content Focus:**

- Share success stories from under-represented groups (with permission);
- Highlight programs incorporating Indigenous knowledge and universal design principles;

- Demonstrate how courses can be adapted for different learning needs;
- Show how Indigenous perspectives and accessibility are embedded in teaching;
- Feature staff training in cultural competency and disability awareness; and
- Emphasise Blue Cross First Aid Institute's commitment to both cultural safety and accessibility.

– Distribution Channels:

- Utilise Indigenous media outlets and disability networks;
- Share through community organisations serving under-represented groups;
- Ensure all digital platforms meet accessibility standards;
- Display materials in relevant community spaces;
- Use social media with appropriate accessibility features; and
- Distribute through NDIS providers and Indigenous community centers.

3.6 Informing students of their rights and obligations

It is a mandated requirement within the Outcome Standards for RTOs that Blue Cross First Aid Institute to provide information to students prior to their enrolment or commencement in training about the agreed training to be provided, the amount of any fees to be paid by the student, other charges and refund arrangements, support services available and the student's rights, obligations and requirements. Our advertising and marketing material performs an important role in supporting this compliance requirement to inform prospective students about the services to be provided. Whilst this requirement relates to the marketing and advertising of training, it is addressed fully in policy arrangements detail within the Enrolment Policy (*ref to PP2.2-Enrolment*).

3.7 Quality control of advertising and marketing material

All advertising and marketing material must be subject to a quality control check before this material is proposed to the Chief Executive Officer (CEO) for approval and distribution. All advertising and marketing material must be approved by the CEO before they are released. No staff member of Blue Cross First Aid Institute is authorised to approve the use of any advertisements or marketing material.

This quality control check is to happen during the development of advertising and marketing material. No advertising and marketing material is to be communicated to the public or privately unless it has passed quality control and been approved for distribution. This is an important component of our self-assurance arrangement to ensure that any advertising and marketing material that is published complying with relevant standards and this policy. The quality control is to be undertaking using the *Marketing Information Checklist*.

3.8 Quality review of advertising and marketing material

All advertising and marketing material that is currently published and in use is to be subject to a periodic quality review in accordance with the Calendar of Assurance Activities. A quality review is best undertaken every six months to ensure that current advertising and marketing material is complying with the relevant standards and this policy. The quality control is to be undertaking using the *Marketing Information Checklist*. Please refer to the Calendar of Assurance Activities for when quality review of advertising and marketing material is scheduled.

4. Considerations

4.1 Scaling advertising and marketing material in support of enrolment

Advertising and marketing material many different types of media can come in all shapes and sizes across many different types of media. The amount of information that we include in the advertising and marketing material will depend on the target audience and the format in which the information is provided. As a general preference, when publishing advertising and marketing material either as printed course brochures or as digital products which are being communicated either online or via email, Blue Cross First Aid Institute prefer to include as much information as possible about the planned service that the prospective student is considering.

Noting this, it should be acknowledged that advertising and marketing strategies are simply aimed at creating interest and obtaining an enquiry from a prospective student. Whilst advertising and marketing information certainly forms part of the pre enrolment information process, it is not a requirement to communicate all aspects of the service in advertising and marketing material. In some circumstances minimum information can be communicated to attract an enquiry which can be followed up by more detailed engagement with the student as part of a full pre-enrolment information engagement. There are situations such as when using social media or potentially text based course offerings where minimum information will be provided, and this will align with the absolute minimum requirements that is mandated by the standards. The following guide is provided

when considering the absolute minimum information requirements in advertising and marketing material.

- **Social media and text based advertising:** The absolute minimum information that must be included in advertising and marketing material where there may be limited space to communicate information is the following:
 - Business name or logo;
 - RTO number or code;
 - The training product being offered with the full code and title as published on the national training register;
 - Disclosure of services being delivered by a third party (if applicable);
 - Details of funding, subsidy or financial support (if applicable);
 - Call to action, such as a link to the website to obtain more information.
- **Basic course flyer, DL, or website.** Where there is a little more space but there are still some limitations, the following information is recommended to be communicated. This level of detail represents the minimum level of detail to satisfy pre-enrolment information requirements to inform the prospective student about the service to be delivered:
 - Business name or logo,
 - RTO number or code,
 - The training product being offered with the full code and title as published on the national training register;
 - Disclosure of services being delivered by a third party (if applicable);
 - Details of funding, subsidy or financial support (if applicable);
 - Details of licence or certification outcomes (if applicable);
 - The NRT logo (optional);
 - The entry requirements for the course;
 - Basic description of the service to be delivered including:

- Outline of the course program and how it is structured,
 - Where a qualification is being advertised, a list of the units of competency being delivered as part of the service with an indication of core and elective designation,
 - The modes of the training delivery,
 - Delivery locations,
 - The duration of the course,
 - Attendance requirements including the hours of attendance and/or designated days or block training periods,
 - The time commitment required by the student including for any self-paced study or assessment work,
 - The requirement for assessment to complete the course,
 - The requirement for work placement (if required) including, the time commitment required for work placement,
 - Material the student needs to hold to participate in training including consideration of access to information technology capabilities for after-hours study, dress and equipment requirements, stationary requirements,
 - The language, literacy, numeracy and digital proficiency skills required to undertake the training (may be specified in entry requirements),
 - Licences or certifications the student needs to hold to participate in training such as holding a white card, holding a current working with children check, etc.
- Direct the student to review pre-enrolment information including the schedule of fees and charges and the student handbook prior to their enrolment.
 - Encouraging and supporting people from under-represented groups to enrol including people with disability and First Nations people.
 - Privacy statement about the collection, holding, use and disclosure of personal information in accordance with the Privacy Act 1988.

- Call to action, such as a link to the website to obtain more information or contact details to make an enquiry.
- **Details course brochure, prospectus or website.** Where advertising and marketing material is being published into a comprehensive course guide particularly as part of the pre-enrolment information process, much more detailed information can be provided. The following is recommended to include in a comprehensive course guide used as part of advertising and marketing material:
 - Business name and logo,
 - RTO number or code,
 - The training product being offered with the full code and title as published on the national training register;
 - Where a qualification is being advertised, a list of the units of competency being delivered as part of the service with an indication of core and elective designation;
 - Disclosure of services being delivered by a third party (if applicable);
 - Details of funding, subsidy or financial support (if applicable);
 - Details of licence or certification outcomes (if applicable);
 - The NRT logo (optional);
 - The entry requirements for the course;
 - A description of the occupational outcome that the course is intended to support;
 - The options for Credit Transfer or Recognition of Prior Learning;
 - Detailed description of the service to be delivered including:
 - Outline of the course program and how it is structured,
 - The modes of the training delivery including a description of supervised and non-supervised components of the course,
 - Delivery locations and an outline of the facilities and amenities that are available including details on public transport, parking, food options, safety considerations,

- The duration of the course including a breakdown of the study periods (terms/semesters), allocation breaks or holidays,
 - Attendance requirements including the hours or attendance and/or designated days or block training periods,
 - The time commitment required by the student including for any self-paced study or assessment work that will need to be completed outside of attendance time and an average each week,
 - The requirement for assessment to complete the course including the breakdown of the assessment methods and what the student can expect with the different types of assessment tasks, the compulsory requirement for assessment to complete the course, etc,
 - The requirement for work placement (if required) including, the time commitment required for work placement, at what point this will be happening in the course, who will be organising work placement, the compulsory requirement for work placement to complete the course, etc,
 - Material the student needs to hold to participate in training including consideration of access to information technology capabilities for after-hours study, dress and equipment requirements, stationary requirements,
 - Certifications the student needs to hold to participate in training such as holding a white card, holding a current working with children check, etc.
- The AQF certificate that will be awarded to at the end of the course when all requirements have been met or if the student's enrolment end before the end of the course; and
 - Direct the student to review pre-enrolment information including the schedule of fees and charges and the student handbook prior to their enrolment.
 - Encouraging and supporting people from under-represented groups to enrol including people with disability and First Nations people.
 - Privacy statement about the collection, holding, use and disclose of personal information in accordance with the Privacy Act 1988.

- Call to action, such as a link to the website to obtain more information or contact details to make an enquiry.

4.2 Using advertising or marketing as part of the enrolment

It should be acknowledged that advertising and marketing is separate from the requirement to engage with the student prior to their enrolment or commencement which includes other specific information requirements. Whilst advertising and marketing is separate from this process, it obviously can and does contribute to presenting the student with structured and accurate information prior to their enrolment or commencement. If minimalistic options are being considered for advertising and marketing, Blue Cross First Aid Institute

must ensure that mandatory pre enrolment information that is required to be communicated to the student is communicated using an alternative information source once the student has made contact.

Ultimately, all students should receive this mandatory information that informs them of their rights and obligations, fee payment and refund obligations and about the services to be delivered prior to their enrolment or commencement. Advertising and marketing can certainly play a part in this information process as a component of the student's enrolment (ref to *PP2.2-Enrolment*).

5. Procedure

Steps		Person/s responsible
5.1 Quality control of advertising and marketing material in development		
i.	Determine the need for marketing CEO and Office Manager determine the need for marketing. They will identify; – the intended audience – the training products to market – the budget for marketing – the type of media to use	CEO Office Manager

ii.	Prepare draft marketing materials Prepare draft marketing materials in line with relevant standards and this policy. It is also important to prepare advertising and marketing material to align with the related training and assessment strategy. Assuming that the training and assessment strategy is accurate, this is the best reference point to ensure that the information being communicated in marketing is also accurate.	Office Manager
iii.	Check draft marketing materials using the Marketing Information Checklist Check draft marketing materials meet the requirements of relevant standards and this policy by checking the advertising and marketing material against the criteria within the <i>Marketing Information Checklist</i>. Where the proposed marketing does not comply, make necessary changes to meet the requirements of relevant standards and this policy and record these changes in the <i>Marketing Information Checklist</i>.	Office Manager
iv.	CEO authorisation of marketing material Provide marketing materials and the completed <i>Marketing Information Checklist</i> to the CEO for final review and authorisation. All advertisements and marketing material must be approved by the CEO before they are released. No staff member of Blue Cross First Aid Institute is authorised to approve the use of any advertisements or marketing material. The CEO is to check marketing materials are in line with Outcome Standards for RTO's and associated Compliance Standards for RTOs and all requirements of the <i>Marketing Information Checklist</i> have been met.	CEO

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v.	Retain a record of the quality control process and outcomes Retain a copy of the <i>Marketing Information Checklist</i> together with the advertising and marketing material as evidence of this quality control process.	CEO
vi.	Consider any Opportunities for Improvement to this process Consider the opportunities for improvement that may have emerged during the process for the development of advertising and marketing material and record these within a Continuous Improvement Report for consideration at a future management meeting. Refer to: PP4.7 - Continuous Improvement and PP4.3 - Management Meeting.	Office Manager CEO
vii.	Release advertising and marketing material Following authorisation by the CEO, advertising and marketing material may be released for public use in support of student recruitment and enrolment activities.	Office Manager
5.2 Quality review of advertising and marketing material		
i.	Identify advertising and marketing material for review In accordance with the scheduled activity within the <i>Calendar of Assurance Activities</i>, the CEO and Office Manager are to identify all advertising and marketing material that is currently in use across various forms including the website, social media, printed format and digital information documents. Samples of this advertising and marketing material is to be gathered in a central file including web links and screenshots where appropriate. This sample will act as the basis for the review and as a historical record of the quality review that was undertaken.	CEO Office Manager
ii.	Verify advertising and marketing material against the scope of registration	Office Manager

	Undertaker comparison of the current advertising and marketing material that is in use with the scope of registration to confirm that the training products being marketed and advertised is consistent with the approved scope of registration.	
iii.	Review draft marketing materials using the Marketing Information Checklist Check current advertising and marketing material that is in use meet the requirements of relevant standards and this policy by checking the advertising and marketing material against the criteria within the <i>Marketing Information Checklist</i>. Where the proposed marketing does not comply, make necessary changes to meet the requirements of relevant standards and this policy and record these changes in the <i>Marketing Information Checklist</i>. Where significant changes or improvements needed to be made to current advertising and marketing material, these should be captured within our continuous improvement arrangements. The Office Manager is to complete a Continuous Improvement Report for consideration at a future management meeting. This may require no further action by management however it is important to capture the record of these improvements made through this quality review process.	Office Manager
iv.	CEO authorisation of advertising and marketing material The Office Manager to provide the CEO a verbal briefing on the outcomes of the quality review and make available the finalised marketing materials and the completed <i>Marketing Information Checklist</i> to the CEO for final review and authorisation. All advertisements and marketing material must be approved by the CEO before they are released. No staff member of Blue Cross First Aid Institute is authorised to approve the use of any advertisements or marketing material. The CEO is to check advertising and marketing material are in line with Outcome Standards for RTO's and associated Compliance	CEO Office Manager

	Standards for RTOs and all requirements of the <i>Marketing Information Checklist</i> have been met.	
v.	Retain a record of the quality review process and outcomes Retain a copy of the <i>Marketing Information Checklist</i> together with the advertising and marketing material as evidence of this quality review process.	CEO
vi.	Consider any Opportunities for Improvement to this process Consider the opportunities for improvement that may have emerged during the process for the development of advertising and marketing material and record these within a record of continuous improvement for consideration at a future management meeting. Refer to: PP4.7 - Continuous Improvement and PP4.3 - Management Meeting.	Office Manager CEO
vii.	Update live advertising and marketing material Following authorisation by the CEO, reviewed advertising and marketing material may be updated for public use in support of student recruitment and enrolment activities.	Office Manager

6. Other documents to consider with this policy

Policies

- PP4.3 Management Meetings
- PP4.7 Continuous Improvement

Forms

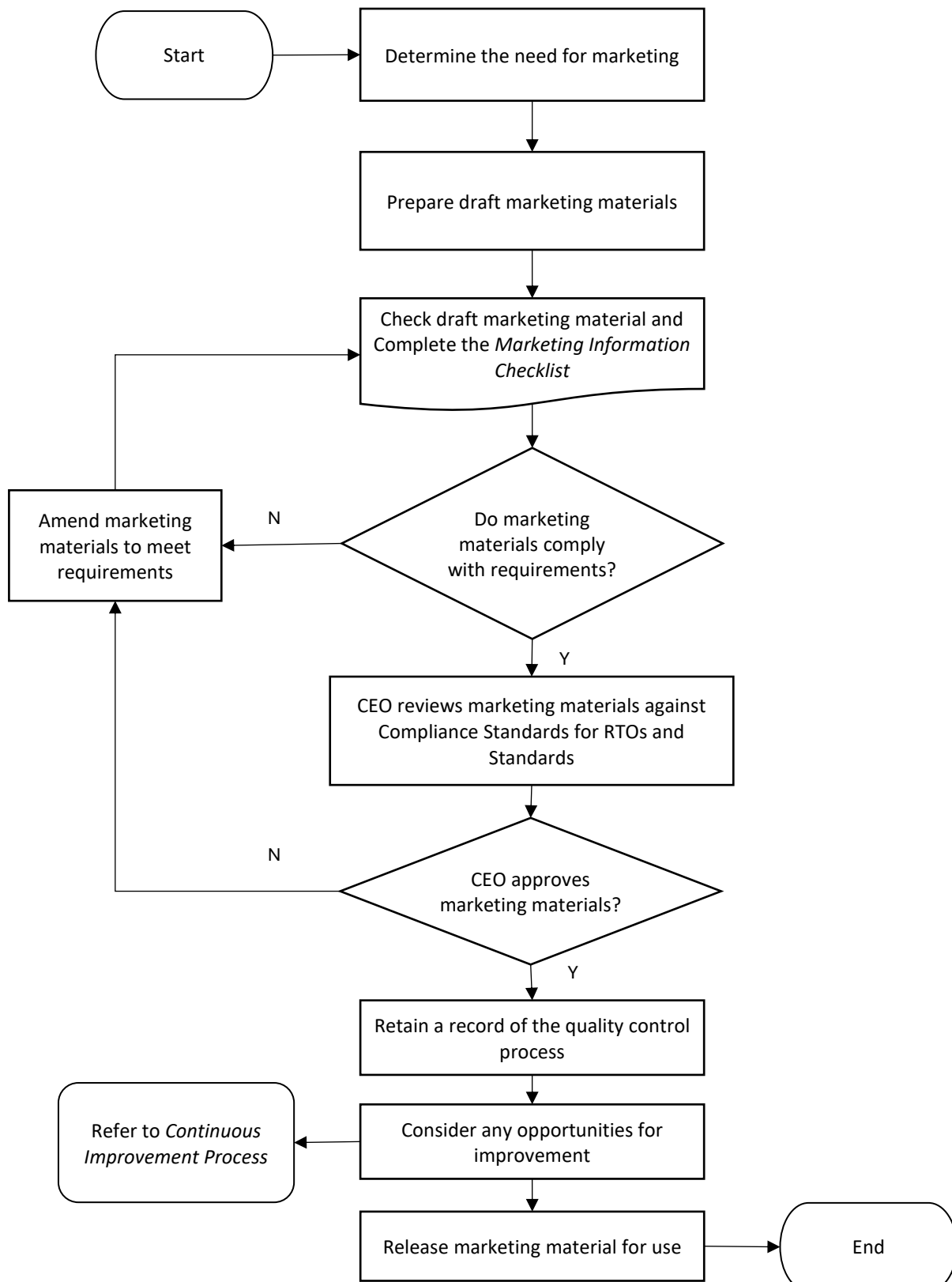
- Marketing Information Checklist
- Continuous Improvement Report

Handbooks, manuals or other documents

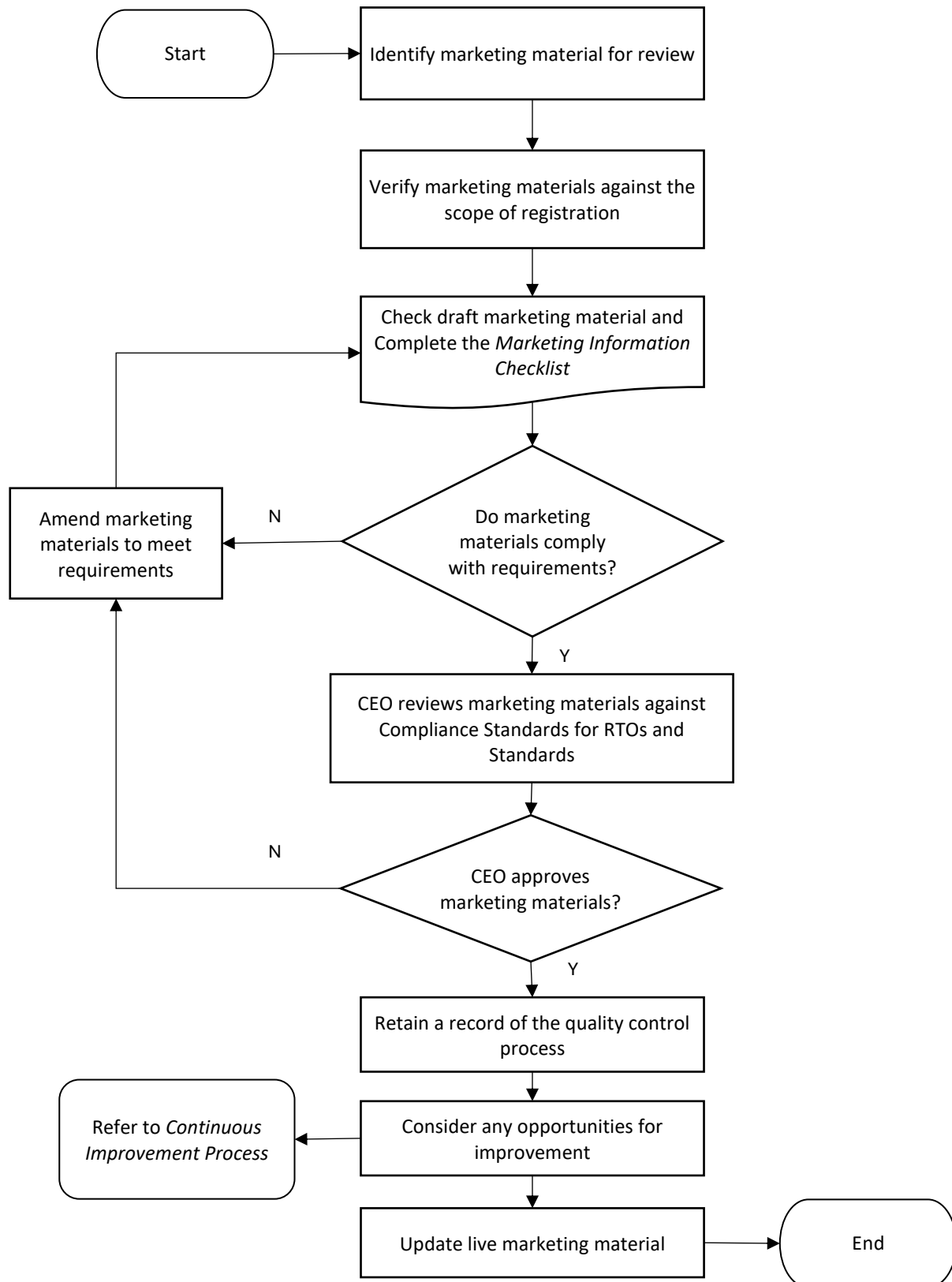
None.

7. Flow chart

Quality control of advertising and marketing material in development



Quality review of advertising and marketing material



8. Reference(s)

Compliance Standards for RTOs for RTOs, Standard 7 and 8 Marketing and advertising:

7 Marketing and advertising

- (1) An NVR registered training organisation must ensure any advertisements or marketing materials published or disseminated by the organisation, a third party or an expert engaged by the organisation:
 - (a) include the organisation's registration code or a link to the part of the National Register where the organisation's registration code is located;
 - (b) where the advertisements or marketing materials refer to the organisation's services – accurately represent those services, including by distinguishing the types of training and assessment that will result in the issuance of AQF certification documentation from any other training and assessment delivered by the organisation or a third party;
 - (c) include accurate information regarding any financial support arrangements available in respect of the services referred to in the advertisements or marketing materials; and
 - (d) do not refer to or imply a connection with another person unless the consent of that person has been obtained.

1 Note: Section 2C of the *Acts Interpretation Act 1901* provides that the term "person" includes a body politic or corporate as well as an individual.

- (2) Where the advertisements or marketing materials refer to a training product, an NVR registered training organisation must ensure the advertisements or marketing materials:
 - (a) include the code and title of the training product as published on the National Register;
 - (b) accurately represent the training products on the organisation's scope of registration;
 - (c) only refer to a training product that is no longer current while it remains on the organisation's scope of registration and new enrolments are permitted; and

- (d) only represent that completion of a training product will lead to a licensed or regulated outcome where this has been confirmed by the relevant industry regulator.
- (3) Where advertisements or marketing materials refer to services that an NVR registered training organisation has engaged an expert or third party to deliver – the organisation must ensure the advertisements or marketing materials identify which services will be delivered by the expert or third party, including where an expert or third party is:
 - (a) recruiting prospective VET students on behalf of the organisation; or
 - (b) delivering training and assessment on behalf of the organisation.

8 Guarantees and inducements

An NVR registered training organisation must not make any verbal or written guarantees that a VET student:

- (a) will successfully complete a training product;
- (b) can complete a training product in a manner which is inconsistent with any of the requirements set out in an instrument made under section 185 of the Act, as in force from time to time; or
- (c) will obtain a particular employment outcome, where obtaining such an employment outcome is not within the organisation's control.

Outcome Standards for RTOs, Standard 2.1, VET students have access to clear and accurate information, including to make informed decisions about the training product and the RTO, and are made aware of changes that affect them.