

# Marketing Policy

## Scope

This policy is applicable to Kaplan Higher Education Pty Ltd trading as Kaplan Professional (referred to as “Kaplan”). The policy applies to all Kaplan staff involved in the provision of marketing design and practice of its services to students and clients, including Third Parties.

## Purpose

The purpose of this policy is to ensure that Kaplan complies with the *Higher Education Standards Framework (Threshold Standards) 2015*, specifically but not limited to Standard 7 on *Representation, Information and Information Management*.

This policy is to ensure that there is a procedure that clearly articulates the processes to be followed when designing, promoting and distributing marketing materials for all courses and qualifications offered by Kaplan, including information presented on the Kaplan website. This policy also ensures that Kaplan markets its education business in a professional, honest, ethical and accurate manner, maintaining the integrity and reputation of Kaplan and the wider education industry.

## Definitions

**TEQSA** – Tertiary Education Quality and Standards Agency

**AQF** – Australian Qualifications Framework

## Marketing Principles

- As a registered institution of higher education, Kaplan must ensure that it provides accurate, ethical and non-misleading information about its operations and performance, as well as courses and qualifications, to enable clients and students (both current and prospective) to make an informed decision regarding their education. This principle applies whether any information presented by Kaplan is disseminated directly by staff or through third parties contracted by Kaplan.
- Where third parties are engaged to represent Kaplan, these parties are bound by formal contracts whereby the performance of the third party is consistently monitored, with prompt corrective action being undertaken in the event or likelihood of misrepresentation of Kaplan, or unethical conduct by the third party.
- Third parties contracted to represent Kaplan must be provided with the appropriate resources necessary to represent Kaplan. Contracted third parties are only permitted to present Kaplan information in their marketing materials under the direction of Kaplan.
- All marketing materials will be developed by the Marketing Team in consultation with the Kaplan Teaching and Learning Team and the Kaplan Quality, Regulations and Standards (QRS) Team. Marketing materials include but are not limited to:
  - Course/program brochures
  - Marketing flyers and banners

- Newsletters
  - Radio and/or television broadcasts
  - Kaplan website
  - Official Kaplan social media sites
- Accuracy, integrity, currency and validity of the information provided will be checked and verified by respective managers.
  - Marketing materials will be edited with all due care and responsibility and must reflect that Kaplan's primary function is that of education. Marketing materials must clearly articulate the knowledge and specialisation of Kaplan as educators.
  - All marketing materials, including electronic forms, will include the Kaplan Professional corporate logo and must clearly identify Kaplan's legal entity name and business name (trading as), along with its associated ABN and HEP provider number where appropriate.
  - Kaplan will ensure that all necessary information is provided to prospective students regarding the requirements of any Kaplan course or qualification. This includes any information regarding pre-requisites or assumed knowledge for the course or qualification along with policies regarding academic credit and recognition of prior learning. Prospective students must also be provided with information regarding how they may cancel their enrolment and how they can withdraw from their course or subject before the census date without incurring an academic or financial penalty.
  - Kaplan must provide to prospective and current students details regarding tuition fees and other charges, including information regarding FEE-HELP and any associated FEE-HELP charges that may be applicable to their course (including the FEE-HELP loan fee for undergraduate courses).
  - All information about Kaplan's courses and qualifications must adhere to this Policy irrespective of the medium or method of dissemination or publication of the information (including all marketing whether in hard copy or digital, brochures, websites, social media and online directories).
  - The Kaplan website is the primary source of the most accurate and up-to-date information used to market its courses and qualifications to clients and students (both current and prospective).
  - Kaplan's course and subject outlines, brochures, website and all other marketing material, including approved third party marketing material, must be reviewed regularly in accordance with the marketing review process outlined in Annexure A to this Policy.
  - Marketing materials must clearly differentiate between non-accredited and accredited courses or qualifications. Where a course or qualification is aligned to an AQF level, the marketing materials must clearly state that the course is a nationally accredited AQF level course or qualification.
  - If a course or qualification is accredited with an external body in addition to TEQSA, this must be clearly stated on any marketing materials.
  - Kaplan must obtain written permission from the owner of any article, testimonial, photograph and/or video which is to be used in its marketing campaigns. This must be documented on an "*Authority to Use Information Form*".
  - No guarantees are to be made to a prospective or current student that they will successfully complete a Kaplan course or qualification.
  - No guarantees are made to prospective or current students that they will obtain a particular employment outcome as a result of completing a Kaplan course or qualification. Marketing materials must state, however, the possible career pathways along with eligibility for registration to professional bodies, where applicable.

## Marketing Approval Procedure

- All Kaplan marketing material will be developed by the Marketing Team in collaboration, where appropriate, with the Teaching and Learning team and the Compliance and Quality Assurance (Higher Education) Manager.
- All Kaplan marketing material must be approved via the marketing review process outlined in Annexure A.
- The Marketing Team must ensure that all marketing material promoting Kaplan courses and qualifications contain the mandatory content as set out in the Marketing Checklist at Annexure B to this policy. This includes information provided via:
  - Kaplan's website;
  - Kaplan's subject/course outline documents and course brochures; and
  - An approved third party (including the third party's websites and other marketing collateral referring to Kaplan or any of its courses or qualifications).
- The Marketing Team must verify that any marketing leading to an AQF qualification are easily distinguishable to any other training and assessment services offered by Kaplan.
- For final approval, the CEO, or their approved delegate, is required to authorise the use of the materials by signing the Marketing Checklist which is then forwarded to the Marketing Team for processing or corrections, as required.
- The Marketing Team must ensure that all revised materials accurately reflect the courses on scope and changes are communicated to staff.
- Staff involved in the provision of marketing material are to maintain up-to-date knowledge of the requirements relating to marketing in accordance with the Tertiary Education Quality and Standards Agency Act 2011 and the Higher Education Standards Framework (Threshold Standards) 2015.
- Kaplan will keep an up-to-date register of all current and historical marketing material.
- All marketing materials must be archived showing changes and improvements

## Relevant Legislation

Tertiary Education Quality and Standards Agency Act 2011

<https://www.legislation.gov.au/Series/C2011A00073>

Higher Education Standards Framework (Threshold Standards) 2015

<https://www.legislation.gov.au/Details/F2015L01639>

## Related Policies and Documents

Other policies associated with this policy are to be found on the Kaplan Professional website.

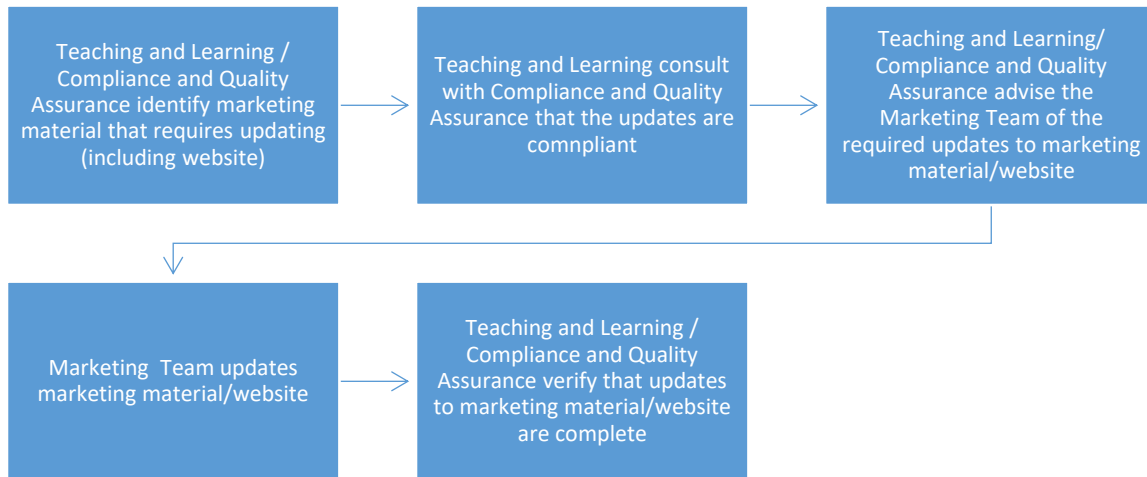
- Admissions Policy
- Privacy Policy

## Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to ensure compliance with this policy.

<b>Policy Category</b>	Academic			
<b>Responsible Officer</b>	Vice President, Academic			
<b>Implementation Officer</b>	General Manager, Marketing			
<b>Review Date</b>	September 2022			
<b>Endorsed by:</b>		<b>Approved by:</b>		
CEO - Kaplan Professional Education		Vice President, Academic		
<b>Version</b>	<b>Authored by</b>	<b>Brief Description of the Changes</b>	<b>Date Approved:</b>	<b>Effective Date:</b>
1.0	Quality, Regulation & Standards Team	New policy and procedure.	05.09.2019	09.09.2019
1.1	Quality, Regulations and Standards Team	Updated provider category to Institute of Higher Education  Updated roles and team titles	N/A	13.07.2021

## Annexure A – Kaplan Marketing Material Review Process



## Annexure B – Kaplan Marketing Checklist

In the development of all marketing materials for **(insert Qualification/Subject Code and Title)**, the following items have been addressed.

Checklist	Course Outline	Brochures	Website	Social Media	Other	Comments for Changes
Aligns with scope of registration <ul style="list-style-type: none"> <li>✓ Current &amp; on scope; OR</li> <li>✓ Superseded but within 12 months of new qualification being published and still on scope</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Includes Higher Education Provider Code and ABN/ACN number	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Includes correct title and AQF level of qualifications	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Is any person or third party referred to? (ie student testimonial) If so, has consent been documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
There is a clear distinction between nationally accredited courses and non-accredited courses.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Material does not guarantee: <ul style="list-style-type: none"> <li>✓ Successful completion</li> <li>✓ Particular employment outcome (can indicate pathways)</li> </ul>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Advertises licensed, professionally accredited or regulated outcome? If yes, is there verification of the licencing regulator/accrediting body approving the arrangements.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>For approval use only</b>						
Checked by Quality & Compliance: (YES/NO)	<u>Signature:</u>				<u>Date:</u>	
Approved by CEO: (YES/NO)	<u>Signature:</u>				<u>Date:</u>	
<input type="checkbox"/> Checked	<input type="checkbox"/> Submitted for final approval				<input type="checkbox"/> Recorded in Marketing Register	