

Marketing and Advertising Policy

Kaplan Education Pty Ltd



Scope

This policy is applicable to Kaplan Education Pty Ltd trading as Kaplan Professional ('Kaplan'). The policy applies to all Kaplan students and staff involved in the provision of marketing and advertising to students and clients, including relevant third parties.

Purpose

The purpose of this policy is to ensure that Kaplan Professional complies with the Standards for Registered Training Organisations, 2015, Standards 4.1, 5.1, 5.2 and 5.3.

Policy Statement

Kaplan Professional will ensure students have accurate and accessible information about all Vocational Education training products and services via the Kaplan Professional website.

Definitions

The following terms and definitions are applicable to this Policy.

AQF	Australian Qualifications Framework
AQF Qualification	A qualification endorsed in a training package or accredited in a VET accredited course.
ASQA	The Australian Skills Quality Authority (ASQA) is the regulator for vocational education.
Course	For this policy, a course includes one or more units of competency but does not include all the units to complete an AQF qualification.
Consent	Written approval from any person or organisation quoted in the marketing or advertising of a Kaplan Professional training product.
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 AQF certification documentation. The NRT Logo is a registered trademark under <i>RTO Standards 2015 Schedule 4</i> .
Non-accredited courses	For this policy, a non-accredited course contains no units of competency and is not a recognised vocational education qualification or course. A non-accredited course may be required for licensing in an industry.
TAS	The Training and Assessment Strategy is the documented approach of, and method adopted by, an RTO with respect to training and assessment designed to enable learners to meet the requirements of a training package/ VET accredited course (<i>RTO Standards 2015</i>). There is a Training and Assessment Strategy document for every Kaplan Professional training product.
Transition	When a training package is superseded or deleted, there is a transition period (usually 12 months) until students in the previous version have completed their studies or transitioned to the new version.
Training product	An AQF qualification, skill set, unit of competency, VET accredited short course or module/course which includes units of competency.
VET Accredited Course	means a course accredited by the VET regulator in accordance with the Standards for VET Accredited Courses. As at the date of this policy, Kaplan does not offer any VET accredited courses.



Policy Principles

Clear, current and accurate

To achieve compliance with RTO Standards 4.1, Kaplan must ensure that clear, current and accurate information about Kaplan Professional as an RTO is provided to enable informed choices by clients and students. This includes, but is not limited to, information about the following:

- Courses.
- Qualifications.

This obligation applies to Kaplan whether the information is disseminated directly by staff, published on the Kaplan Professional website, or provided by an approved third party. Kaplan must also ensure that all information is provided to prospective students about the entry and study requirements of a course or qualification, including any information about any pre-existing or assumed knowledge and skills.

All information about Kaplan's courses and qualifications must adhere to this Policy irrespective of the medium or method of dissemination or publication, including all advertisements whether in hard copy or digital, brochures, websites, social media, and online directories.

Source of truth

The Kaplan Professional website is the primary source of information to market and advertise Kaplan courses and qualifications and is also the primary method by which current information is provided to prospective students about Kaplan Professional's courses and qualifications.

Approval process

Kaplan 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 Appendix A. These processes are to ensure that marketing content aligns with the Training and Assessment Strategy (TAS) for each training product. A checklist is provided in Appendix B for Kaplan to verify the compliance of webpages for VET training products.

For changes to the website which are not related to a specific training product, these changes must also meet requirements of the RTO Standards 2015. These changes may require the approval of various stakeholders, as outlined in Appendix C and are subject to the checklist in Appendix B.

Non-accredited training

Marketing materials must clearly differentiate between all non-accredited training (non-AQF training) and AQF training, so students can clearly understand whether units of competency are awarded at the completion of their studies.

NRT Logo

The Nationally Recognised Training (NRT) logo must only be used on AQF qualification documents within Kaplan's scope of registration and in marketing material in accordance with the VET Quality Framework. The conditions of use of the NRT logo are listed in the *RTO Standards 2015 Schedule 4*.



The NRT logo must not be used:

- in association with training which does not lead to an AQF statement of attainment or AQF qualification certificate. This includes non-accredited courses which do not include any units of competency.
- on any Kaplan stationery.

No guarantees

Kaplan Professional staff must ensure that no guarantees are provided in any marketing and advertising material as required in RTO Standards 4.1 I. There should be no guarantee that

- a prospective or current student will successfully complete a Kaplan course or qualification on its scope of registration.
- courses can be completed in a way that does not meet RTO Standard 1.1, 1.2 requirements in terms of:
 - training package requirements for the units of competency
 - the amount of training including
 - existing skills, knowledge and experience of the learner
 - mode of delivery (online, face-to-face, blended)
 - proportionally if the number of units does not comprise of a full qualification.
- that a student is eligible for licensing or accreditation on course completion unless this is confirmed or
- that a student will obtain a particular employment outcome as a result of completing a Kaplan course or qualification.

Guiding Procedures

Marketing and advertising approval

All Kaplan marketing material must be approved by either:

- the **marketing training product review process** in Appendix A including the Academic, QRS and Marketing teams. This includes Course Outlines, Subject Outlines, Brochures, Training Product webpages and third-party webpages. or
- the **marketing website change review process** in Appendix C. This includes any webpages which are not related to a specific training product and can come from any team or stakeholder, such as a webpage/banner that is used for a combination of Higher Education, Vocational Education and non-accredited courses.

Both approval processes use the checklist of relevant RTO Standards in Appendix B.

As at the date of this policy, Kaplan does not engage with any third parties.

All Kaplan marketing and advertising material including the website must be approved by the General Manager, Marketing and B2C Sales, or delegate. Technical changes follow the process in Appendix A which includes the General Manager, Marketing and B2C Sales.

The Kaplan Marketing team must ensure that all marketing and advertising material promoting Kaplan courses and qualifications contains the minimum mandatory content as set out in the Marketing Checklist within Appendix B. This includes the information provided via:

- Kaplan Professional's website
- Kaplan subject/course outlines and course brochures/flyers; and
- any approved third party, including the third party's websites and other marketing and advertising collateral referring to Kaplan or any of our courses or qualifications.

The Quality, Regulation and Standards team is available to provide advice on any questions about marketing and advertising compliance.



Consent for training product endorsements

The Kaplan Marketing team must ensure that written consent is obtained from any person, including any current, former or prospective student, or any organisation referred to, quoted or mentioned in any Kaplan marketing and advertising material.

Disclosure of funding arrangements

Kaplan has a 'fee for service' business model. Kaplan Professional does not currently use any Commonwealth, State or Territory funding for Vocational Education courses/qualifications. If any funding is applicable in the future, the source of the funding and methods of obtaining approval for the funding must be disclosed in all marketing and advertising material including the Kaplan website.

Training of Marketing Team

Kaplan staff involved in the provision of marketing and advertising are to maintain up-to-date knowledge of requirements relating to marketing and advertising of training products and the use of nationally recognised logos by regularly reviewing the ASQA website.

Record management

The Marketing team will keep a current register for up to seven years of:

- all current and historical marketing material; and
- consent given for all endorsements on the website by current or former students.

Complaints and Appeals

Any complaint or appeal in relation to the implementation of this policy will be managed in accordance with the Grievances, Complaints and Appeals Policy published on the Kaplan Professional website.

Relevant Legislation

As a registered education provider, Kaplan operates under strict legislation and regulations. Policies and procedures are in place to ensure compliance with the legislative instruments referenced below.

- National Vocational Education and Training Regulator Act 2011 (Cth)
- Standards for Registered Training Organisations (RTOs) 2015 (Cth).

Related Policies

This policy should be read in conjunction with the following Kaplan policies and documents:

- Grievances, Complaints and Appeals Policy
- Enrolment Policy
- Enrolment Terms and Conditions
- Training and Assessment Strategy Policy
- Third Party Arrangements Policy.



Version Control and Accountable Officers

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

Policy Category	Marketing			
Responsible Officers	Chief Executive Officer			
Implementation Officers	General Manager, Marketing and B2C Sales General Manager, Academic Content Development Head of Academic Governance and Compliance Head of Academic Operations and Engagement			
Review Date	June 2027			
Approved by:				
Policy Committee				
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
1.0	Compliance Manager — Vocational and Professional Education	New policy and procedure	28.3.2018	3.9.2018
2.0	Quality, Regulations and Standards Team	New template including clearer definitions. revised NRT logo information, Annexures A and B revision, clearer description of Head of Marketing approvals.	18.02.2021	01.03.2021
2.1	Quality, Regulations and Standards team	Immaterial change to job titles	26.08.2021	02.09.2021
3.0	Quality, Regulations and Standards team	An additional review process has been added for changes to the website which are not related to a specific training product yet are still required to meet regulatory requirements.	11.06.2024	18.6.2024

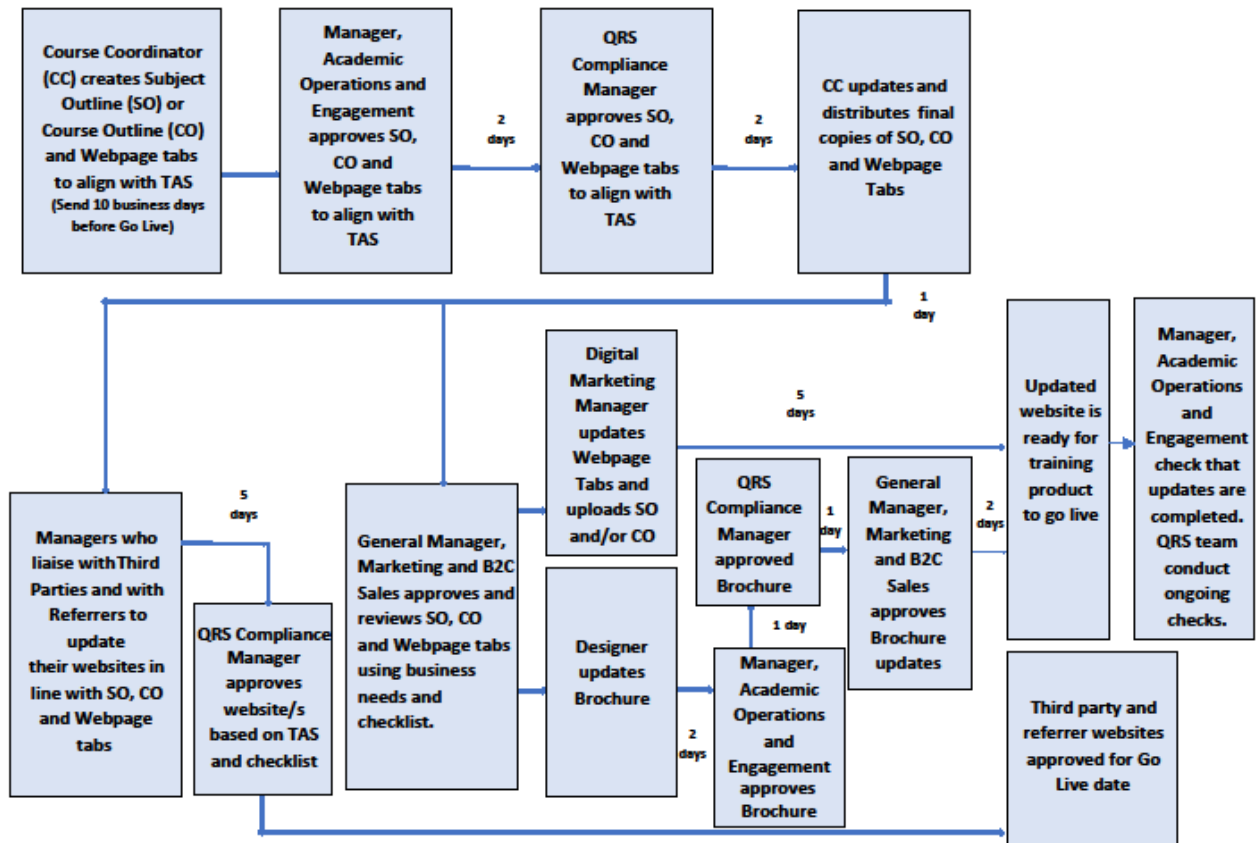


Appendix A Marketing Review Process for Training Product updates

Process – Sign off for VE updates

Version 4

22 April 2024





Appendix B Marketing and Advertising Checklist

Checklist	Website	Course / Subject Outline	Brochure	Social Media	Other	Comments for Changes
1. Kaplan Professional trading name, company details and RTO code listed as Kaplan Education Pty Ltd trading as Kaplan Professional ABN 54 089 002 371 (RTO 90116)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
2. Aligns with scope of registration (until the teach out dates) https://training.gov.au/Organisation/Details/90116	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
3. Webpages, tabs, course/subject outlines and brochure in agreed format – Course code then course title	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
4. NRT Logo used only as permitted in RTO Standards Schedule 4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
5. Start date or enrolment commencement date as set out in the relevant TAS – confirmed by Academic Content Development team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
6. Duration and amount of training of course/subject/ qualification, as in the TAS - confirmed by Academic Content Development team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
7. Entry requirements that the student needs to meet before starting the course/ qualification/subject, as set out in the TAS – confirmed by Academic Content Development team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
8. Location and modes of delivery (online, blended, face-to-face) as set out in the TAS, confirmed by Academic Content Development team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
9. Learning outcomes in course/qualification/subject as set out in the TAS, confirmed by Academic Content Development team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
10. Units of competency (core/elective) (if applicable) as set out in the TAS, confirmed by Academic Content Development team	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
11. Advise student where the course/qualification/subject has a licensing outcome as set out in TAS	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
12. Is any person or third party referred to? (i.e. student testimonial) If so, has consent been documented?	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
13. Does not make guarantees of successful completion or an employment outcome	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
14. Any third parties are declared by Kaplan and any third parties declare if they advertise or train on behalf of Kaplan	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
15. RTO is responsible for quality and issuing certificates	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
16. Students' rights to complaints and appeals, and in case of RTO (or third party) disclosure	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
17. Students' obligations for course completion and materials/equipment/technology required	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
18. Information on support services, fees, terms and conditions, any cooling off period, USIs and right to a refund	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
19. Approval of General Manager, Marketing and B2C Sales or delegate	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	

Appendix C Marketing Website Change Review Process (other than training product updates)

Version 1 13 March 2024

A stakeholder initiates a proposed change to the website.

Stakeholders may include the CEO, KP teams or the Marketing team.

The Marketing team determines compliance implications.

Marketing team review resources:

- the RTO Standards checklist (Appendix B)
- Team training
- Marketing map of webpage relationships
- Communication with stakeholders.

Review with stakeholders and final approval.

Depending on the change, stakeholders may include:

- Compliance
 - Head of Academic Governance & Compliance or delegate
 - National Manager, Quality Assurance & Compliance (QRS team)
- Product – Head of Academic Operations & Engagement team or delegate
- General Manager, Academic Content Development or delegate
- Legal – General Counsel
- Other stakeholders and KP teams

Final approval from the CEO and GM, Marketing & B2C Sales

Approvals:

- CEO
- General Manager, Marketing & B2C Sales or delegate

The Marketing team develops the approved website changes

Review changes uploaded to website after implementation.

Review by compliance and other stakeholders listed above as required.