

# Marketing Policy (GC)

Queensland Institute of Business Technology Pty Ltd  
ABN 38 076 195 027

## Document

<b>Document Name</b>	Marketing Policy (GC)
<b>Brief Description</b>	This Policy outlines how Griffith College seeks to ensure that its staff, partners and potential students have a clear and accurate understanding of the College, its education programs and related services.
<b>Responsibility</b>	Director, Marketing and Admissions
<b>Initial Issue Date</b>	05/03/2009
<b>Authorising Body</b>	Management Committee

## Version Control

<b>Date</b>	<b>Version No.</b>	<b>Summary of Changes</b>	<b>Reviewer Name and Department/Office</b>
16/09/2020	5	Amendments to agent documents and links. Additional policy amendments	Director, Marketing and Admissions
09/11/2022	6	Updated for currency and accuracy	Director, Marketing and Admissions

## Related Documents

<b>Name</b>	<b>Location</b>
Navitas Educational Advisor Management Policies and Procedures	<a href="#">Internal Document</a>
Transfer of Provider	<a href="#">Policy Library</a>
Privacy Policy	<a href="#">Policy Library</a>
Nomination of Agent Form	<a href="#">PDF</a>
Developing New Marketing Materials Procedure	<a href="#">Internal Document</a>
Website Review Procedure	<a href="#">Internal Document</a>
Setting Annual Tuition Fees Procedure	<a href="#">Internal Document</a>

# Contents

1	Purpose and Scope .....	3
1.1.	Introduction .....	3
1.2.	Purpose .....	3
1.3.	Scope .....	3
1.4.	Definitions .....	4
2.	Policy Statement.....	4
2.1.	Marketing Strategy and Planning .....	4
2.2.	Marketing Material .....	4
2.3.	Advertising in Newspapers/Magazines/Electronic Media .....	5
2.4.	Website Management .....	5
2.5.	Setting Tuition Fees (Annually) .....	5
2.6.	Promotional Items .....	6
2.7.	Training of Griffith College Marketing Staff .....	6
2.8.	Managing Educational Agents .....	6
2.9.	Appointment of Education Agents .....	6
2.10.	Training and Monitoring of Education Agents .....	7
2.11.	Dishonest or Unethical Conduct by an Education Agent .....	8
2.12.	Education Agent Contact Details .....	8
2.13.	Change of Education Agent .....	8
2.14.	Implementation and communication .....	9
3.	Responsibilities .....	9
4.	Compliance .....	10
4.1.	General .....	10
4.2.	Relevant Legislation .....	10
4.3.	Review .....	10
4.4.	Records Management.....	10

# 1 Purpose and Scope

The purpose of this policy is to ensure that the Griffith College (College) brand, image, and reputation are promoted in a cohesive, consistent, and positive manner to stakeholders. This includes having a clear and accurate understanding of the College, its education programs and related services through its marketing information and practices.

The Marketing team will manage all aspects of the College's corporate identity, brand management and marketing activities including advertising, student recruitment through various Educational Agents, student recruitment events, promotional publications, online and social media marketing, branding and design of corporate materials and templates (as outlined in the Brand Guidelines).

## 1.1. Introduction

This Marketing Policy sets out the approach of Griffith College relating to the management of Griffith College's marketing.

## 1.2. Purpose

The purpose of this Policy is to ensure that the marketing of Griffith College and its education programs is undertaken in a professional manner that maintains the integrity and reputation of Griffith College, the Navitas Group and Griffith University.

Griffith College is committed to:

- producing high quality, effective and consistent marketing and promotional materials that are not false or misleading, and consistent with Australian Consumer Law,
- ensuring that all marketing and promotional material complies with the [ESOS Act 2000](#), [The National Code 2018](#), the [Higher Education Standards Framework \(2021\)](#), [TEQSA Act 2011](#) and other consumer legislation and thus providing sufficient information for students to make an informed choice of course, provider and place of study,
- ensuring that marketing and promotional materials are coordinated and consistent with Griffith University's marketing and brand objectives, and
- maintaining the integrity and reputation of Griffith College, Griffith University and Navitas Pty Ltd

## 1.3. Scope

This Policy has been prepared in accordance with the Navitas Educational Advisor Management Policy and Procedures the [Transfer of Provider Policy](#), the [Privacy Policy](#) and standard 4 of [The National Code 2018](#) and Higher Education Provider Guidelines 2012.

College Marketing will provide centralised oversight and leadership in developing, advancing, and stewarding the College's brand image and reputation in a cohesive and consistent manner to achieve the College's recruitment and positioning goals and objectives. College marketing activities will be aligned to achieve the College's vision, strategies, and objectives outlined in the Strategic Plan through an annual integrated strategic marketing plan and budget developed by the Marketing team in consultation with the Academic and Student Services teams.

Navitas University Partnerships Australasia (UPA) Central Marketing, with the support of Global Marketing, is responsible for developing and delivering all collateral and advertising used by the College to support marketing and recruitment plans and activities. UPA Central Marketing will also coordinate major campaigns, events and promotional items that support overall marketing objectives.

All marketing and communication materials must comply with the College's Brand Guidelines and be authorised for publication by the Director, Marketing and Admissions in consultation with the College

Director and Principal. Where required, and as outlined within the Griffith University Griffith College Contract, approvals will also be sought from Griffith University's Marketing and Communication team.

## 1.4. Definitions

**Advertising:** is a tactical execution of marketing and brand messages for the purpose of promoting the College, its programs and courses, and other services using traditional and non-traditional mediums.

**Brand image:** is how the College is perceived by stakeholders and the general public.

**Corporate identity:** includes the logo, logo positioning, logo variations, slogan, corporate colours, typography and other elements of visual identity. The rules governing corporate identity are contained in the Brand Guidelines.

**Collateral:** includes the media, brochures, posters, signs, visual aids, information sheets, other printed information and web content to support marketing plans and strategies.

**Marketing activities:** are activities designed to promote the brand image of the College using various media, including print, electronic, radio, outdoor, and display advertising.

**Stakeholders:** include prospective students and their influencers, current students, alumni, staff, Executive, the Academic Board, University Partner, government, suppliers, business and industry partners, other customers, and the general public.

**Recruitment:** The act of identifying potential students, informing them of the opportunities available at the College, evaluating them for their fit with the College's offerings, and providing a range of materials and activities to assist them to decide if the College is the correct educational destination for them.

**Campaign:** *A coordinated series of linked advertisements or an organised course of action to promote the College with either a single idea or theme or a nominated time period.*

## 2. Policy Statement

### 2.1. Marketing Strategy and Planning

The College's Strategic Plan outlines the marketing objectives and tactics for the next five years. These are reviewed and adjusted annually in line with reassessing the strategic plan each year. This is endorsed by the Queensland Institute of Business and Technology Pty Ltd (UPA) Board.

Progress reports against strategies and targets are monitored and shared with the Management Committee for each trimester.

### 2.2. Marketing Material

All marketing material must:

- clearly identify the name of the College;
- include the CRICOS number of the College and the programs being promoted;
- provide information which is accurate and unambiguous;
- be approved by the relevant authority identified in the Griffith College Delegated Authorities Policy and Griffith University as required in the Griffith / Griffith College Agreement;
- be consistent with the partner University and Navitas Group Corporate Brand Guidelines;
- comply with the National Code of Practice for Providers of Education and Training to Overseas Students (with particular reference to Standards 1, 2 and 4) (National Code, 2018);

- comply with the Education Services for Overseas Students (ESOS) Act (sections 8, 9 and 107).
- make every reasonable attempt to inform individuals who participate in photo shoots or videos, including graduations and other functions, that the material may be used for marketing purposes.

### 2.3. Advertising in Newspapers/Magazines/Electronic Media

Advertisements to be placed in newspapers, magazines or electronic media (including social media), and promotional material to be provided to Education Agents, are to be signed off by the Director Marketing and Admissions. Advertisements and promotional material require different considerations regarding International Student advertising and Domestic Student advertising.

College logos, CRICOS and Provider logos may be required. Information appearing in advertisements must be accurate and current. All College delivered program and course information as per current pathway arrangements, must be shown in full, with the correct course codes. Legal entity and company names and CRICOS provider must also be presented on advertisement and marketing materials.

Budgets are required and marketing plans considered along with these advertising projects. Photo permission evidence needs to be accepted and recorded. Advertisements are filed, along with any editorial documentation, for future reference and review. This includes above and below the line advertising, with particular focus on digital and programmatic advertising including search engine, social media and display advertising.

[\(Developing New Marketing Material Procedure\)](#)

### 2.4. Website Management

Griffith College recognises the importance of and undergoes continuous revision of its website content and layout to ensure staff, current and potential students, partners and the general public are presented with up-to-date and accurate information.

The website must comply with the Brand Guidelines. The Director of Marketing and Admissions holds overarching authority and accountability for the College external facing website, registration of domain names and social media where a recipient might reasonably believe the information is written on behalf of the College.

[\(Website Review Procedure\)](#)

### 2.5. Setting Tuition Fees (Annually)

In line with the Higher Education Provider Guidelines 2012 (5.35.1):

Tuition fees for each unit of study for each cohort, must be published and made publicly available by 1 October in the year immediately preceding the year in which the student cohort commences its course of study.

Griffith College will be informed by the partner University fee setting principles and align to increases as approved by the Management Committee, and subsequently, UPA EGM.

[\(Setting Tuition Fees Procedure\)](#)

## 2.6. Promotional Items

The Director, Marketing and Admissions approves all proposals to produce Griffith College-branded items for gifts or sale, in line with established Marketing Plans, to ensure that high standards of quality and suitability are maintained.

## 2.7. Training of Griffith College Marketing Staff

Griffith College actively supports and promotes staff training to aid in compliance with the marketing policy and its underpinning legislation. Marketing staff are provided an induction on the National Code 2018 Standards and ESOS Framework upon commencement and are advised:

- they cannot actively recruit students studying at other institutions before they have completed six months of study of the principal program in the package;
- that any applicant enrolled with another provider must produce a Letter of Release, and in the case of students younger than 18 years of age, written permission from a parent or legal guardian.
- will make every reasonable attempt to inform individuals who participate in photo shoots or videos, including graduations and other functions, that the material may be used for marketing purposes.
- Student recruitment must be undertaken in a professional manner to maintain the integrity and reputation of the College. No students will knowingly be recruited where the recruitment would conflict with the National Code 2018 and relevant College policies and procedures, including the College's Admissions Policy and Procedures.

## 2.8. Managing Educational Agents

Griffith College (through the Parent; Navitas Group) engages the services of education agents around the world to assist in its international marketing activities. Details of all agents are established in the Navitas Group, Customer Relationship Management (CRM) and maintained in PRISMS. Education Agents will be listed on the College website.

Education Agents are required to:

- be ethical and knowledgeable;
- be up to date with current visa requirements, College programs and the education environment;
- monitor visa refusals, student feedback and application activity; and
- adhere to the terms and conditions of their agreement with the College (and Navitas).

## 2.9. Appointment of Education Agents

Guidelines for appointment are articulated in the Navitas Educational Advisors Management Policy and Procedures(Section 2).

Agents undergo an application process prior to appointment, which involves referee checks. If considered acceptable, the Agreement incorporates acknowledgement by the Education Agent that they and their staff have read and understood the National Code Standards relating to agents and ESOS framework and agree and accept the terms and conditions outlined in the Navitas Agent Agreement.

As the appointment of Education Agents spans the Navitas Group, the Agreement is signed by the Executive General Manager – Sales and Marketing.

## 2.10. Training and Monitoring of Education Agents

As required under the Standard 4: 4.3.4 of the National Code of Practice 2018 Education Agents are required to have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.

### 2.10.1. Agent Training

Education Agents receive updated information and training via a range of means, including:

- Account management by a key central Navitas contact in each region or country
- face-to-face and/or online meetings/visits throughout the year from Griffith College, Griffith University and/or Navitas staff focussing on training regarding programs, facilities, admissions processes, support services, accommodation and lifestyle;
- face-to-face and/or online meetings with other Navitas College staff travelling for marketing/admissions purposes;
- face-to-face and/or online visits with Navitas staff located in offshore offices, such as China, India, Japan, Korea, Vietnam, Turkey, Pakistan, Kenya, Indonesia, Malaysia, UAE, Thailand, Nepal, Nigeria, Turkey, United Kingdom and South America;
- face-to-face and/or online visits with Griffith University staff based on a Griffith campus in South East Queensland;
- face-to-face visits with Griffith University staff located offshore, such as United Arab Emirates, Syria, India, Japan, China, Europe (Ukraine and Sweden);
- dissemination of hard copy and/or electronic brochures, posters and other marketing collateral;
- regular contact with Griffith College Admissions and Marketing staff through;
  - (Conference calls),
  - email conversations and electronic flyers agent familiarisation visits/tours to and of Griffith College;
  - partnering to represent Griffith College at educational exhibitions;
  - outcomes of student surveys; and
  - newsletters.

### 2.10.2. Monitoring and Review

Educational Advisor performance is reviewed against the following criteria to determine if agreement should be renewed or archived:

- The Educational Advisor's compliance with the Navitas Educational Advisor Agreement, and Navitas Agreement Terms & Conditions;
- Number and conversion rate of students the Educational Advisor has recruited during the term of agreement:
  - Student applications to offers; and
  - Offers to actual enrolment of students;
- Number of student visa refusals for students recruited by the Educational Advisor;
- Any feedback or information from students or third parties regarding the Educational Advisor; and
- The quality, accuracy and currency of information and advice provided by the Educational Advisor to students.

Upon assessment of the above criteria, a recommendation to renew or archive the Agent account is made to Navitas Agent Management team.

## 2.11. Dishonest or Unethical Conduct by an Education Agent

As a registered provider of higher education, Griffith College must ensure its Education Agents:

- declare in writing (and take reasonable steps) to avoid conflicts of interest with the provider,
- observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students
- act honestly and in good faith, and in the best interests of the student
- Griffith College and Navitas must take immediate corrective action when becoming aware of dishonest or unethical behaviour such as engaging in false or misleading recruitment practices, of its Education Agent such as:
  - a deliberate attempt to recruit a student who has been studying with another provider for less than six months;
  - facilitating the recruitment of a student who will not be able to comply with the conditions of his/her visa;
  - creating a Confirmation of Enrolment, or causing one to be created, for anyone other than a bone fide student;
  - deliberately providing information to a potential student, or to Griffith College, which is incorrect or fraudulent;
  - acting in a manner which is negligent, careless or incompetent;
  - providing migration advice (unless authorised under the Migration Act).

If Griffith College or the Navitas Channel Partner Services team discovers an Education Agent has engaged in dishonest or unethical conduct, it will, through provision of the Agent Management Strategy, take immediate preventative and/or corrective action appropriate to the nature of the conduct and ensure notices are uploaded to the Agent Management database. This could include:

- additional training which highlights Griffith College's expectations;
- not accepting students recruited by the education agent;
- terminating the agreement with the education agent; and/or
- alerting relevant Australian authorities of the situation.

## 2.12. Education Agent Contact Details

Griffith College performs routine checks to ensure accurate details of all Agents are published on its website. For Education Agents for with whom Griffith College (Navitas) has a formal written agreement, the following information is maintained:

- Country;
- Agency Name;
- Legal Entity;
- Name of Principle agent; and
- Street Address/es.

The details of these agents can be found at the Find an Agent section of the [Griffith College website](#).

## 2.13. Change of Education Agent

Where a student contacts Griffith College to advise that they wish to change their education agents, Griffith College will consider the request in accordance with the following conditions:

- Where a student has made an application to study, but has not accepted their offer or paid tuition fees, Griffith College will accept a [Nomination of Agent Form](#). The agent that is listed on the student's file at the time of accepting the offer and paying fees will be eligible for any commission payable.
- Where a student has accepted their offer to study at Griffith and/ or Griffith College, and paid tuition fees to either institution, Griffith College will not consider a change of agent. The agent



that is listed on the student's file at the time of accepting the offer and paying fees will be eligible for any commission payable.

- Any student that wishes to communicate directly with Griffith College will be permitted to do so, regardless of whether they have accepted their offer or paid tuition fees. The agent that was originally involved with bringing the student to Griffith College will be eligible for any commission payable if the student eventually enrolls. Any requests for information, that are received after the student has elected to communicate directly with Griffith College, will be refused in accordance with the Griffith College [Privacy Policy](#).
- A student that has made a direct application may inform Griffith College that they have selected an agent to assume responsibility by lodging the [Nomination of Agent Form](#). Griffith College will accept the form where the selected agent has a current Griffith College Agency Agreement. The agent that is listed on the student's file at the time of accepting the offer and paying fees will be eligible for any commission payable.

## 2.14. Implementation and communication

This policy and procedure will be implemented and communicated throughout the College via:

- the College's internal portal;
- internal circulation to staff via email;
- the College Policy Library; and
- staff professional development (e.g., via induction and other means)

## 3. Responsibilities

<b>Responsibility</b>	<b>CDP</b>	<b>QCM</b>	<b>DMA</b>	<b>AM</b>	<b>MM</b>
Maintain currency of policy	A		R		
Review agent performance annually and submit to management committee	I	I	A	R	C
Liaise with Partner University each trimester on visa rejection statistics	I	I	A	R	I
Agent Training and Review in line with 2.9.1 and 2.9.3			A		R
Ensure Agent contact details on website is accurately reflected in the PRISMS database			A	R	C
<p>CDP = College Director &amp; Principal, QCM = Quality &amp; Compliance Manager, DMA = Director, Marketing &amp; Admissions, AM = Admissions Manager, MM = Marketing Manager</p> <p>R = Responsible, A = Accountable, S = Supporting, C = Consulting, I = Informed</p>					

## 4. Compliance

### 4.1. General

Director Marketing & Admissions will ensure staff are informed about this Policy through staff meetings and communications.

### 4.2. Relevant Legislation

[ESOS Act 2000](#)

[The National Code 2018](#)

[The Higher Education Standards Framework \(2021\)](#)

[TEQSA Act 2011](#)

[Higher Education Provider Guidelines 2012](#) and other consumer legislation

### 4.3. Review

This Policy is tested and reviewed at least every 24 months and when at the time of any changes to the regulatory compliance requirements, legislation, regulation and guidelines. This review process aims to ensure alignment to appropriate strategic direction of Griffith College and continued relevance to Navitas' current and planned operations.

### 4.4. Records Management

All records in relation to this document will be managed as follows:

<b>Record type</b>	<b>Owner</b>	<b>Location</b>	<b>Retention</b>	<b>Disposal</b>
Policy	Director, Marketing & Admissions	Policy Hub	Permanently with control in place for revisions	Policy Hub archive