

Marketing Policy and Procedures

1. Scope

This Policy and Procedures applies to the staff and contractors developing promotional and marketing information or materials or providing marketing or promotional materials to students and prospective students on behalf of Holmes Institute (Holmes). This includes all material used to invite students, including overseas students, to apply to study a course at Holmes or used to indicate that Holmes is able to provide a course of study to students.

2. Purpose

This Policy and Procedures is developed to outline marketing standards at Holmes and to ensure consistency in the manner in which promotional materials are developed and communicated, through high quality marketing activities.

3. Policy Principles

- 3.1 Holmes is committed to marketing ethically and with integrity.
- 3.2 All marketing materials will be produced in compliance with the requirements of the Education Services for Overseas Students Act 2000, the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (the National Code) and any other relevant legislation.
- 3.3 The marketing and promotion of Holmes' courses must not be false or misleading and must be consistent with Australian Consumer Law.
- 3.4 Holmes must include its Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered name, provider code and the CRICOS course code relevant to the courses being promoted in all its written and online materials accessible for the purpose of:
 - a) Providing or offering to provide a course to an overseas student;
 - b) Inviting an overseas student to undertake or apply for a course; or
 - c) Indicating that Holmes is able or willing to provide a course to overseas student.
- 3.5 Holmes must, in seeking to enter into written agreements with students or intending students, not provide any false or misleading information on:
 - a) Its association with any other persons or organisations that Holmes has arrangements with for the delivery of its courses in which the student intends to enrol or may apply to enrol;
 - b) Any work-based training a student is required to undertake as part of the course;
 - c) Prerequisites – including English language proficiency – for entry to the course; and

- d) Any other information relevant to Holmes, its courses or outcomes associated with those courses.
- 3.6 Marketing staff are suitably trained regarding Holmes' obligations under the ESOS legislative framework prior to providing information to potential students or agents.
- 3.7 Holmes will not promise overseas students any possible migration outcome from undertaking any course offered by Holmes.
- 3.8 Holmes will not guarantee a successful education assessment outcome for a student or intending student.
- 3.9 Holmes will not actively recruit a student wishing to transfer from another provider before the student has completed six months of their principal course except in circumstances permitted in the National Code, Standard 7 (Overseas Student Transfers).

4. Procedure Principles

- 4.1 All marketing material, including the Holmes webpage will clearly identify Holmes' legal name, the CRICOS course code and CRICOS provider code relevant to the courses being promoted.
- 4.2 Marketing materials will be appropriately tailored for the specific targeted market. The market can be by course or country or region.
- 4.3 All new marketing materials must be approved by either the Chief Executive Officer (CEO) or the Chief Operating Officer (COO) before they are used in the marketplace:
 - a) In seeking approval, a draft of the materials must be produced and provided to the CEO or COO for review.
 - b) When approval is given, a Marketing Approval Number will be provided.
 - c) Final approval must be received prior to using the materials in the marketplace. This final approval will be provided along with a version number for the material.
- 4.4 In order to prevent Holmes being misrepresented by the media or unintentional and inappropriate comments being made to journalists, all contact to/from the media must be directed to the CEO or COO.
- 4.5 The CEO or COO will co-ordinate an appropriate response by liaising with relevant staff member(s).
- 4.6 If Holmes wishes to use a staff member's or student's image or direct quotes in marketing material, written permission will be sought from the staff or student before promulgation.
- 4.7 The Holmes website is key to Holmes marketing activities and it will be audited biannually for the accuracy and currency of the information published (See Website Management Policy and Procedure).

Version Control and Accountable Officers

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

Responsible Officer		Chief Operating Officer	
Implementation Officers		Marketing Manager in liaison with the Marketing Team	
Review Date		January 2026	
Approved by			
Governing Council			
Associated Documents			
Admission Requirements Policy and Procedure Website Management Policy and Procedure			
Version	Brief Description of the Changes	Date Approved	Effective Date
1.2	Policy formatted to align with the current policy template; Procedures updated with the change of the roles of approving the marketing materials; Added more details about Holmes website audit.	25 September 2020	25 September 2020