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## Marketing Policy

Patrick's College Australia (PCA) enables informed choice for clients and students by providing clear and factual information, whether this is done directly or by a Third Party. PCA is responsible for all marketing or other material disseminated on its behalf, regardless of the channel or method used.

PCA is conscious of the national requirements for the marketing of nationally recognised training and ensures that the information used is accurate, clear and managed ethically. PCA is subject to all relevant consumer protection law that applies in any jurisdiction where it operates and ensures it honours all commitments it makes.

PCA's marketing or advertising material is consistent with its training and assessment strategies.

PCA:

- ensures its marketing of AQF qualifications to prospective students is ethical, factual, open, honest and accurately represents the services it provides and the training products on its scope of registration;
- does not engage in marketing practices that involve high-pressure selling techniques; and
- regularly monitors and reviews marketing and recruitment materials and practices.

### 1 General Marketing Collateral Requirements

All PCA marketing materials are required to include the following requirements:

- PCA Code must be included;
- The relevant RTO responsible for the training and/or assessment and for issuing a qualification or statement of attainment must be absolutely clear to anyone viewing any marketing or advertising material;
- The NRT Logo is only used in accordance with the conditions of use as noted below;
- Marketing collateral makes clear where a Third Party is recruiting prospective students for PCA on its behalf;
- Marketing collateral distinguishes where PCA is delivering training and assessment on behalf of another RTO (internal to PCA or external partner RTO) or where training and assessment is being delivered on PCA behalf by a Third Party;

- Marketing collateral distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by PCA;
- Marketing collateral includes the code and title of any training product, as published on the National Register, referred to in that information;
- Marketing collateral includes any relevant currency information, such as whether a qualification has been superseded or removed from a training package;
- PCA only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- PCA only advertises or markets that a training product it delivers will enable 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;
- Marketing collateral includes details about any income contingent loan, government funded subsidy or other financial support arrangements associated with PCA's provision of training and assessment; and
- Where PCA delivers training that is not nationally recognised (including school and higher education programs), you must clearly separate marketing or other information about this training from marketing and information about training that is nationally recognised.

## 2 No Guarantee

PCA does not provide any guarantee that:

- A student will successfully complete a training product on its scope of registration; or
- A training product can be completed in a manner which does not meet the requirements of the *Standards for RTOs 2015 (Cth)*; or
- A student will obtain a particular employment outcome where this is outside the control of PCA.

## 3 Conditions of Use of Nationally Recognised Training 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.

PCA only uses the NRT Logo in line with the range of situations and conditions outlined below.

### **Advertisements and Promotional Information in any Medium**

*(Print, television, radio, banners, internet, etc.)*

PCA uses the NRT Logo to promote only nationally recognised training that is within its scope of registration.

PCA ensures impressions are not be created that may lead an observer to conclude the NRT Logo applies to all training provided where this is not the case.

Where training is being promoted that does not meet the requirements stipulated in the VET Quality Framework (that is, non-accredited training) or is outside PCA's scope of registration, it is made clear the NRT Logo is not associated with that training.

### **Client Information**

*(Brochures, course handbooks, prospectuses, etc.)*

PCA ensures that when it is promoting the training it offers and wishes to use the NRT Logo, its promotional material such as brochures, handbooks and prospectuses clearly distinguish between nationally recognised training within the scope of registration and that which is not nationally recognised.

### **Corporate Stationery, Business Cards, Buildings, Training Resources and Marketing Products**

PCA does not use the NRT Logo on products such as corporate stationery, business cards, building signage, mouse pads, pens, satchels, packaging around products nor learning resources supporting training.

### **Certificates, Statements of Attainment and other Testamurs**

PCA ensures the NRT Logo is correctly and accurately depicted on all AQF certification documentation issued. The NRT Logo is not depicted on other testamurs or record of results.

### **NRT Logo Specification**

The NRT logo consists of both the triangular shape and the descriptor. 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.

The complete NRT logo may be varied in size. The size and position of the NRT logo on the final product is at the discretion of the product designer. 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.

### **Two colour reproduction**

Where the NRT logo is reproduced in colour, it must comply with these 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

### **One colour reproduction**

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.

## **4 Conditions of Use of Australian Qualifications Framework Logo**

PCA only uses the AQF Logo in line with the range of situations and conditions outlined below.

## **Course Appropriateness**

The AQF logo cannot be associated with education and training that does not lead to an AQF qualification. If promoting both AQF qualifications and qualifications that do not meet the requirements specified in the AQF, PCA ensures it is made clear that the AQF logo is not associated with those that are not AQF qualifications. The impression must not be created that may lead an observer to conclude that the AQF logo applies to all education and training provided, if this is not the case.

## **Course within Scope of Registration**

PCA may use the AQF logo to advertise or promote AQF qualifications that it is authorised to offer.

## **Permitted Collateral Uses**

PCA may use the AQF logo on student information, advertising and promotional material.

## **Non-Permitted Collateral Uses**

PCA ensures that the AQF Logo is not be used for corporate use including corporate stationery such as business cards and letterhead; building or other corporate signage; marketing products such as mouse pads, pens, satchels, product packaging; or educational resources used to support teaching and learning.

## **AQF Logo Specification**

No element of the logo can be altered, moved or changed in any way. Under no circumstance is the logo to be reproduced in mirror image or be rotated.

The AQF logo must consist of both the circular/arrows shape and the words 'Australian Qualifications Framework' and be set in the typeface Gill Sans Light or Gill Sans Regular. The complete AQF logo may be varied in size but the proportions of the circle/arrows and the words in relation to each other may not be varied.

The minimum clear space required around the logo image is 10mm on all sides. No other graphic or text elements may appear within the clear space.

The AQF logo must always appear in:

- Its principal Pantone spot colours: PMS 144C, 3272C, 258C;
- Black C and white; or
- Reversed out of black.

### ***Black and white reproduction***

Where the AQF logo is reproduced in one colour, it must be in black and white.

### ***Reversed out of black reproduction***

Where the AQF logo is reproduced in one colour and it is used on backgrounds where black print will not be legible, reversed black and white may be used.

## 5 Testimonials and other References

Where PCA makes reference to another person or organisation (such as testimonials or photos) in marketing or advertising material, it has gained consent from the person or organisation for the use of that reference. This includes references via text, statements, logos and photos. PCA ensures all testimonials are true and correct before using them to endorse products.

All PCA students provide consent to the use of photos and other images that are taken at PCA learning activities and events, through the relevant release clause in the PCA General Application Form. Usage in these instances is generally one off, group images for general operational and promotional purposes.

Students are able to 'opt out' of this release if they wish, with all 'opt-outs' recorded in the <<SPIRE>>

Various PCA contractual arrangements with government stakeholders, enterprise clients and other third parties may routinely include consent for the use of information and images in marketing collateral, including the use of organisational logos and other trademarks.

## 6 Government Loan, Funding, Subsidy or other Support

Where students would be accessing any government income contingent loan or subsidy, PCA provides details of these arrangements. Details include:

- Any costs associated (including interest or similar costs);
- Any debt that will be incurred; and
- Any loss of entitlement from the student undertaking a course at PCA.

This includes, in the cases of limited entitlement schemes, where students are only able to access one course or there are restrictions on what courses may be subsidised after completing their study at PCA.

## 7 NSW Smart & Skilled Specific Marketing Requirements

PCA will ensure our marketing will be in line with NSW Smart & Skilled Program:

- Only markets, publicises or otherwise communicates its connection to Smart and Skilled in accordance with the Smart & Skilled Contract and Operating Guidelines.
- Publishes and makes available readily accessible information on all of its approved qualifications.
- Acts in good faith and does not act in any way that could be seen to be unethical, reckless, illegal or dishonest conduct, in relation to any matter.
- Does not do anything that may bring into disrepute or be detrimental to the Department, any Government Agency, Smart and Skilled or vocational education and training.
- Notifies the Department if PCA becomes aware of any unethical, reckless, illegal or dishonest conduct in relation to vocational education and training, including fraud or misconduct.

### ***Marketing Smart and Skilled***

All marketing, promotional, communication and information materials used by PCA related to Smart and Skilled (including PCA's approved qualifications) displays PCA's legal name and code as displayed on the national register, [training.gov.au](http://training.gov.au).

PCA develops and implements strategies for the effective marketing and promotion of Smart and Skilled including all of its approved qualifications. These strategies do not rely solely on activities undertaken by the Department and via the Smart and Skilled website for promotion. PCA retains copies of these strategies and all marketing and promotion materials to demonstrate implementation of the strategies.

PCA takes steps to ensure that any prospective student, who may be reasonably considered to be eligible to receive subsidised training, is properly informed about the availability of subsidised training under Smart and Skilled. This is done as soon as practicable after the prospective student contacts PCA. PCA has no obligation however to market or promote any approved qualifications where its Smart & Skilled Financial Cap has been or is likely to be exceeded.

### ***Department intellectual property***

PCA does not use any logo, product names, icons, trademarks or other intellectual property of the Department, or the NSW Government, including in connection with Smart and Skilled without written permission from the Department or the NSW Government and subject to any guidelines that are issued from time to time.

### ***Acknowledgement of source of subsidies and restrictions on promotion***

PCA explicitly acknowledges in marketing and information for Prospective Students the availability of subsidies from the NSW Government. In any communications about Smart and Skilled (including regarding approved qualifications) PCA uses the statement:

*'This training is subsidised by the NSW Government.'*

PCA does not suggest, or allow there to be any misunderstanding, that the subsidised training is 'free of charge', discounted or subsidised by PCA or any other Third Party.

PCA does not, and ensures that its agents and contractors do not, market, publicise or otherwise communicate information about the training or engage in any other conduct that may have the effect of encouraging students to choose a Provider based on price or other inducements (including any financial or other benefit).

### ***Website***

PCA maintains a current and accurate website. The homepage of PCA's website contains a direct link to the Smart and Skilled website so that any person accessing PCA's website should be able to easily and directly navigate to the Smart and Skilled website.

PCA's website includes the following:

- The details of all of PCA's approved qualifications;

- Details of the Notification of Enrolment Process and PCA's enrolment process including the information and evidence that the student must provide (such as, all consents and declarations the student must make) together with details of when such information and evidence is required; and
- The process for obtaining a Unique Student Identifier.

### **Consumer Protection Information**

PCA makes the following information available to students:

- PCA Consumer Protection Policy (including the contact details of the consumer protection officer)
- The contact details for the Department's Customer Support Centre (as provided by the Department from time to time):

[www.smartandskilled.nsw.gov.au](http://www.smartandskilled.nsw.gov.au)

1300 77 21 04

PCA includes the Smart and Skilled website details and 1300 772 104 on all public information, enrolment forms and student induction material so that all consumers are aware of their rights and options for making a complaint or providing feedback about training.

PCA obtains a signed declaration from each student to confirm receipt of this information. This is included in the *Course Fees Agreement*.

### **Student Information**

PCA ensures that all students considering enrolling in subsidised training receive, or are aware of how to access, certain information, either electronically or in hard copy form before enrolment which is designed to make these students aware of policies relating to their training, including their rights and responsibilities and avenues for complaint.

This Student Information includes:

- The Fee Information;
- Information regarding Recognition of Prior Learning, Credit Transfer, deferring or discontinuing subsidised training (including any implication on fees);
- VET Student Loans Program Information (if applicable);
- Subcontractor Information (if applicable);
- What the enrolled student should do if they want to defer or discontinue their Training;
- How to access support and assistance during the training; and
- Contact details for various support services within PCA e.g. interpreter services.

## **8 VET Student Loans**

PCA ensures that any marketing of its approved courses prominently mentions:

- PCA's name and any registered business name or other business name that PCA uses;
- PCA's registration code; and
- The maximum tuition fees for the course.

A VET Student Loans approved course is not marketed by PCA unless the tuition fees for the course have been published on PCA's website in a way that is readily accessible by the public.

PCA ensures that any marketing in which PCA mentions the possible availability of a VET student loan (however described) for students undertaking a course:

- Prominently mentions:
  - PCA's name and any registered business name or other business name that PCA uses; and
  - PCA's registration code; and
  - that VET student loans will not be approved for students who do not meet eligibility requirements; and
  - that a VET student loan gives rise to a HELP debt that continues to be a debt due to the Commonwealth until it is repaid; and
- Presents the information in a font size that is approximately the same as any other marketing information that accompanies it; and
- If the marketing is online—presents the information on the same webpage as the other marketing of the course; and
- If the marketing uses the VET student loans logo—presents the logo in accordance with the style guide for the use of the logo.

PCA never represents, whether by publishing or otherwise, that a VET student loan is not a loan; or does not have to be repaid.

PCA ensures that, for all students enrolling in a course on the basis that some or all of the tuition fees for the course are covered fees, on the day before the student is enrolled, the tuition fees for the course were available on PCA's website in a way that was readily accessible by the public.

### **Social Media**

PCA ensures that any marketing of PCA or its courses through social media does not mention the possible availability of a VET student loan (however described) for students undertaking a course.

### **Inducements**

PCA may from time to time offer benefits to potential students in the form of marketing merchandise up to the total value of **\$30 per person**.

PCA never offers or provides a benefit, or cause a benefit to be offered or provided, where the benefit would be reasonably likely to induce a person to apply for a VET student loan for a course.



### **Use of Third Party contact lists**

PCA will only use Third Party contact lists for the purposes of approved courses for VET Student Loans where the student has given express consent to being contacted by PCA.

Specifically, PCA does not, where student's contact details are received from another person; contact the student to market, advertise or promote a course, or enrol the student in a course where when doing so, or as a result of doing so, mention the possible availability of a VET student loan (however described) for students undertaking the course, unless the student has given express consent to being contacted by PCA.

The student is taken to have provided express consent if:

- Information in the request was presented clearly, and set out the specific purpose for which the student's personal information would be used if consent were given; and
- The request was prominent; and
- The student was able to give consent in a separate optional tick box from other consents; and
- The request was not a required field to be answered in order for a person to submit other information; and
- The request did not include a default tick for consent; and
- The request named PCA; and
- The request detailed any referral fee or other fee that would be paid to the person who made the request and any other benefit that would be provided to the person who made the request.

The student is taken to have provided express consent if the student initiates contact with a Third Party for the purpose of:

- Giving information relating to education and training to PCA; or
- Getting information relating to education and training from PCA.

### **Engaging in cold-calling**

Cold-calling includes making unsolicited contact with a student:

- In person; or
- By telephone, email or other form of electronic communication.

PCA does not cold-call another person to market, advertise or promote a course and when doing so, or as a result of doing so, mentions the possible availability of a VET student loan (however described) for students undertaking the course.

### **Providing information before enrolment**

PCA ensures that students seeking to enrol in an approved course:

- Are fully informed of the tuition fees and any other fees that apply to the course; and
- Are clear about their responsibilities, obligations and rights if they enrol in the course; and

- Are clear about their responsibilities, obligations and rights if they apply for a VET student loan.

Before enrolling a student in an approved course, PCA gives the student the following information:

- All information required to be provided under the Standards for NVR Registered Training Organisations that relates to ensuring that each student is properly informed and protected;
- The tuition fees for the approved course;
- Any fees other than tuition fees that are payable for the course;
- The student's options for paying tuition fees, including:
  - payment by the student as fees become due; and
  - a VET student loan;
- Information about VET student loans, including that:
  - it is a loan from the Commonwealth; and
  - the loan will remain a personal debt until it is repaid to the Commonwealth; and
  - the loan may, until the debt is repaid, reduce a student's take-home (after-tax) wage or salary and may reduce the student's borrowing capacity; and
  - a student may wish to seek independent financial advice before applying for a loan;
- The criteria for being an eligible student for a VET student loan;
- The application process for a VET student loan;
- An explanation that the student may be required during the course to communicate his or her agreement that the Secretary continue to use the VET student loan to pay tuition fees for the course;
- The maximum amount of a VET student loan that may be available for the course under section 8 of the Act (not taking into account the effect of paragraph (b) of that section), and an explanation that the amount of the loan cannot be greater than the student's remaining FEE-HELP balance;
- The amount of HELP debt the student would accrue if the student received the maximum amount of VET student loan for the course (the debt could be up to 120% of the loan);
- An explanation that the tuition fees will be reasonably apportioned across a specified number of sequential fee periods and that each fee period will contain at least one census day;
- Information about census days, including:
  - the meaning of a census day (in accordance with the definition of census day in the Act); and
  - that a student may cancel the student's enrolment in the course or part of the course using PCA's procedure for withdrawal; and
  - if a student withdraws before the census day for a course or part of a course, the student will not incur a VET student loan debt for the course or part of the course and will receive a refund for any tuition fees already paid for the course or part of the course;

- How to access the following on the approved course provider's website:
  - the tuition fees for the course;
  - the census days for the course;
  - PCA's procedures for withdrawal from the course and cancellation of enrolment;
  - other procedures PCA is required to have by this instrument.
- Advice that it is important for an enrolled student to notify PCA of any change of contact details.

## 9 VET Student Loans Logo

The VET Student Loans program logo is the primary focal point of the brand identity. To create and maintain a strong brand presence, it is important to use the logo in a consistent way.



*Full colour*

The full colour version of the logo is the preferred version of the logo and should be used at all times if possible.



*Reversed version*

The logo should always appear on a white background. However where this is not possible, the reversed version is permissible.



*Mono version*

The logo should always appear on a white background. However where this is not possible and there isn't enough contrast between background colour and the reversed version of the logo, a mono version is available for use.

### Brand Usage

To ensure visual consistency of the VET Student Loans program logo, PCA follows these guidelines with no variations.

#### Minimum size

Minimum size specifications are provided to ensure the logo is reproduced effectively at a small size. The logo's width must not be less than 175 pixels as indicated on the left.

#### Clear space

To maintain the integrity and maximise the impact of the logo, a clear space has been defined. The clear space is the minimum area required around the logo (see diagram, left). No text or graphics should enter this clear space.

When using the VET Student Loans program logo, keep a minimum clear space of '2X' surrounding the logo free from typography, illustrations or any other graphic.

'X' is equal to the square height of the dark blue section of the logo.

### ***Incorrect use or incorrect implementation of brand***

PCA ensures the approved VET Student Loans logo is used in its complete and original form as provided by the Department. The logo is not be rearranged or split into individual elements.

PCA does not:

- Stretch the logo
- Condense the logo
- Use colours other than the specified logo colours
- Rotate or reorientate the logo
- Use the symbol or wordmark in isolation
- Use patterns or fills in the brandmark
- Place on a pattern background
- Change the order of the logo colours
- Abbreviate or change the VET Student Loans program name

### **Logo preference**

The preferred form of the VET Student Loans program logo is the full-colour version as indicated on the left. There are also mono and reversed versions for use where using the full-colour version is not possible.

The logo is not used in printed publications.

PCA only uses the logo on their own website on the page which provides information about VET Student Loans - not on the homepage, or in multiple locations throughout the website. PCA provides a link back to the Department of Education and Training's VSL web page ([www.education.gov.au/vet-student-loans-students](http://www.education.gov.au/vet-student-loans-students))

The logo is not used on any other materials or printed publications such as office stationery, business cards, letterheads, signs and pamphlets.

## **10 Marketing Collateral Approval Process**

Before use, PCA ensures all marketing collateral is checked and approved by Marketing Manager Win/PCA, followed by final authorisation from the Business Manager PCA.

Marketing materials are approved using the *Marketing Approval Form*, and once approved are recorded in the *Marketing Register*. Completed Marketing Approval Forms are stored with the relevant marketing collateral in the *Marketing Register* located at:

<<Insert location>>

PCA monitors all marketing activities and collateral on an ongoing basis to ensure it remains current and accurate.

## 11 Promotional Methods

PCA internal and Third Party representatives maintain compliance with a range of regulatory requirements when undertaking promotional activities.

## 12 Do Not Call Register

PCA representatives who make unsolicited contact with potential students in order to sell them course services comply with the *Do Not Call Register Act 2006* and associated telemarketing standards.

## 13 Third Party Representatives

PCA ensures that any Third Party agreements that include the making of telemarketing calls and marketing emails require compliance with the Act.

## 14 Telemarketing and Research Calls Industry Standard

The Telemarketing and Research Calls Industry Standard applies to all voice calls made to Australian numbers that:

- Offer, advertise or promote goods, services, land, interests in land, business opportunities or investment opportunities;
- Advertise or promote suppliers or prospective suppliers of such things;
- Solicit donations; and
- Conduct opinion polling or standard survey-based research.

The industry standard establishes minimum requirements for those making telemarketing and research calls.

### ***Permitted Contact Hours***

PCA representatives do not undertake telephone or fax marketing to clients:

- On a Sunday or a public holiday;
- Before 9am or after 8pm on a weekday; or

- Before 9am or after 5pm on a Saturday.

Except in cases where consent has been given by the call recipient in advance to receive the call during the prohibited calling hours.

***Provision of Information***

PCA representatives making telemarketing calls, at the start of the call, provide their contact information, the name of the person or business that caused the call to be made and explain the purpose of the call.

On request, PCA representatives also provide:

- The source of the telephone number; and
- The name and contact details at PCA for dealing with consumer enquiries and complaints.

***Providing for the termination of calls***

PCA representatives will immediately terminate the call in a range of circumstances, including where the call recipient asks for the call to be terminated or otherwise indicates that he or she does not want the call to continue.

***Requiring callers to enable calling line identification***

PCA ensures that calling line identification is enabled at the time that the caller makes or attempts to make a call.

***Provision of Information during Calls***

PCA provides individuals with certain information when calls are conducted, as per the requirements of the Act. Exactly when the provision of information is needed differs, depending on whether it is a research call or other telemarketing call.

**Telemarketing Calls**

Information that must be provided as soon as the call starts:

- The given name of the person calling;
- The purpose of the call; and
- If the telemarketing company is calling on behalf of another business, the name of that business.

Information that must be provided on request if applicable, but does not need to be provided if the consumer doesn't ask for it:

- The full name or staff ID of the person calling;
- If the person is making the call as an employee of a company or business, the name and contact details of the person's employer;
- If the person is not making the call as an employee of a company or business, their own full name or business name and contact details (details of a telephone number used principally for residential purposes are not required where the caller makes the calls from their residential address);



	<ul style="list-style-type: none"> <li>• If the telemarketing company or business is calling on behalf of another business, the contact details of that business;</li> <li>• The name and contact details of the person responsible for dealing with inquiries and complaints about (as applicable):             <ul style="list-style-type: none"> <li>– The person making the call;</li> <li>– The telemarketing company or business they are calling from; and</li> <li>– The business on behalf of which the telemarketing company or business is calling.</li> </ul> </li> </ul>
<p>Information that must be provided within a reasonable time frame (not exceeding 7 days) if the consumer asks for it:</p>	<ul style="list-style-type: none"> <li>• Where the person calling obtained the telephone number, or that it was from a private individual;</li> <li>• The name of the person the call was intended for (if applicable); and</li> <li>• The name and contact details of any organisation that provided the information to the person calling (if applicable).</li> </ul>