

Marketing Policy

Scope

This policy applies to Kaplan International Languages Schools (each a “School” and collectively the “Schools”):

- Sydney – Kaplan International English (Australia) Pty Ltd (ABN 31 003 631 043) trading as Kaplan International Sydney
- Melbourne/Adelaide – Kaplan International (Melbourne & Adelaide) Pty Ltd (ABN 90 129 017 385) trading as Kaplan International Melbourne and Kaplan International Adelaide
- Perth – Kaplan International (Perth) Pty Ltd (ABN 76 079 200 212) trading as Kaplan International Perth
- Brisbane – Kaplan International (Brisbane) Pty Ltd (ABN 81 097 629 073) trading as Kaplan International Brisbane

Purpose

The purpose of this policy is to provide information to Kaplan International Languages staff who ensure that all advertising, marketing, branding and recruitment material produced by or for the Schools is professional, accurate, ethical and is compliant with all applicable legislative and regulatory requirements.

Policy Principles

Kaplan International Languages is committed to a policy of ethical and truthful advertising and marketing of its products and services, which helps to maintain the integrity of the Australian education sector, and contribute to the positive reputation of the School(s).

All marketing activities carried out by the School(s), including but not limited to advertising, promotional publications, brand management, student recruitment through various Educational Agents, online and social media marketing, will be carried out in accordance with the requirements of this policy and with regard to relevant legislation.

The Student Recruitment and Marketing teams are responsible for ensuring that all marketing strategies and related promotional materials comply with relevant legal and regulatory requirements.

Advertising and marketing collateral will be developed to accurately communicate the nature and benefits of the products and services offered by the Kaplan International Languages Schools.

Student Recruitment

All student recruitment undertaken by the School(s) will be carried out in a professional manner to maintain the integrity and reputation of the Schools and to ensure that the marketing and promotion of its courses and education services is not false or misleading and is consistent with the Australian Consumer Law.

Kaplan International Languages including any of the Schools' approved education agents or representatives, will not actively recruit a student where this clearly conflicts with its obligations under the National Code 2018, Standard 7 (Transfer between registered providers) and relevant School policies and procedures, including the School's Admissions and Enrolments Policy and Procedure and the Agent Management Policy.

General media advertising, marketing and promotional literature (including any materials produced on behalf of the Schools) **will not**:

- compare the School's courses with those provided by competitors
- guarantee completion of the course
- make misleading claims about acceptance into other courses
- make misleading statements concerning the qualifications or experience of staff
- make misleading or false statements about the prospects of employment following the course
- include courses that are not on the scope of registration
- guarantee immigration outcomes

If CRICOS registration has been applied for and has not been received, then a program must not be promoted or published until the School is advised that CRICOS registration has been approved and has disseminated this fact to staff on-campus. This can be done in a targeted approach to key teaching, support and marketing staff and in a broader approach by providing the information on Kaplan's intranet.

The School(s) will ensure that prior to acceptance of any enrolment, current and accurate information has been made available to the student.

This information **will include**:

- the requirements for acceptance into the course(s), including the minimum level of English language proficiency;
- the course content and duration, (including holiday breaks), modes of study for the course and assessment methods;
- campus locations and a general description of facilities, equipment, learning and library resources available to students;
- indicative course-related fees (tuition and non-tuition fees) including advice on the potential for fees to change during the student's course and applicable refund policy;
- information about the grounds on which the student's enrolment may be deferred, suspended or cancelled;
- relevant information on living in Australia, including: indicative costs of living, and
- accommodation options including information for approving accommodation, support and general welfare arrangements for students under the age of 18 years.

- information on the Education Services for Overseas Students (ESOS) framework available at: <https://internationaleducation.gov.au/Regulatory-Information/Pages/National-Code-2018-Factsheets-.aspx>.

This information is provided on our website, currently at:

<https://www.kaplaninternational.com/australia>, on the relevant School page and the Fact File for each Kaplan International Languages School and in the Brochure. In addition, Departure Guides are sent to students as part of the enrolment process.

Website and Promotional Material

The Schools will ensure that the appropriate Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered name and registration number (provider code) will be included in all written and online marketing and promotional materials.

The Schools' provider codes must appear in **all** the Schools written and electronic publications, materials and correspondence which may be viewed by a prospective student. This includes but is not limited to:

- every page of the Schools' websites;
- the prospectus and pre-application information (if in booklet form);
- the Application Form;
- the Student Handbooks, Brochures, Fact Files, Departure Guides etc.
- the marketing tools, such as flyers and banners;
- the letterhead / e-mails or footer used in letters making offers to students, promoting programs or for other marketing purposes;
- an advertisement for programs for international students in an Australian or foreign newspaper;
- the information about living in Australia if it is used as a tool to market to and recruit students; and
- the removeable section of any promotional material which contains a pull out or tear away section.

Kaplan International Languages - Brand and Corporate Identity

Elements of the Schools' brand include its corporate identity, distinctive style and consistent tone and manner across all internal and external communication.

The corporate identity includes the Schools' logo, logo positioning, logo variations, corporate colours, typography and other elements of visual identity.

The corporate identity aims to:

- create a standardised, consistent and clear visual identity for the Schools; and
- project Kaplan International Languages as conscientious, trustworthy and focused on learning outcomes.

Approval for use of the corporate identity, all aspects of branding, advertising template and collateral use are managed by the Head of Marketing.

Advertising Approval

All advertising and marketing material will be reviewed and verified by the Head of Marketing. A final version of the materials will be sent to the Quality, Regulations and Standards Team for final approval before it is published either in print or digitally.

In the event of Kaplan International Languages referring to other persons or organisations within its advertising or marketing material, it will only do so with the prior consent of the person and/or organisation in question.

Through its Privacy Policy, Terms and Conditions and the Electronic Media Policy, Kaplan International Languages informs students and other individuals who participate in the Schools' photo shoots or videos, including, student testimonials, graduations and other functions, that the material may be used for marketing purposes. Participants have the option to opt out of this by informing the School that they do not want to participate and remove themselves.

Relevant Legislation

Education Services for Overseas Students (ESOS) Act 2000

<https://www.legislation.gov.au/Details/C2018C00210>

The National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students 2018

<https://www.legislation.gov.au/Details/F2017L01182>

Education Services for Overseas Students Regulations 2019

<https://www.legislation.gov.au/Details/F2019L00571>

ELICOS Standards 2018

<https://www.legislation.gov.au/Details/F2017L01349>

Department of Home Affairs

<https://www.homeaffairs.gov.au/>

Copyright Act (1968)

<https://www.legislation.gov.au/Series/C1968A00063>

The Australian Consumer Law

<https://consumerlaw.gov.au/australian-consumer-law/legislation>

Related Policies

This policy should be read in conjunction with the following:

- Admissions and Enrolments Policy
- Agent Management Policy
- Electronic Media Policy
- Grievances, Complaints and Appeals Policy

- Privacy Policy
- Refund Policy
- Terms and Conditions of Enrolment
- Transfer Between Providers Policy

Version Control and Accountable Officers

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

Policy Category	Operations			
Responsible Officers	KI Languages Principal Executive Officer			
Implementation Officer(s)	KI Languages Regional Sales & Marketing Manager – Australia & New Zealand			
Review Due Date	April 2021			
Approved by:				
KI Languages Principal Executive Officer				
Version	Authored by	Brief Description of the changes	Date Approved	Effective Date
2.0	Kaplan Australia Quality, Regulations and Standards Team in collaboration with the team at Kaplan International Languages	Revised policy.	01.04.2020	15.04.2020