Marketing Material Development, Approval and Review Policy and Procedure

Policy Owner	CEO
Approving Authority	Governing Council
Implementation Responsibility	CEO
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Current Status	Version 2.0

1. Purpose

This Policy and Procedure establishes SPI's framework for the development, review, approval, control, publication, monitoring, and archiving of marketing materials. It is designed to ensure that all published information is accurate, current, appropriately approved, operationally controlled, and supported by documentary evidence.

This policy and procedure aim to provide precise, consistent and transparent information to current or prospective students, agents, or the general public, in compliance with the ESOS Act, Higher Education Standards Framework 2021 and National Code 2018.

2. Scope

This Policy and Procedure applies to all marketing, promotional, recruitment, and information materials produced, commissioned, distributed, or published by SPI, whether in print, digital, verbal-scripted, event-based, or agent-distributed form. It also applies to materials prepared by SPI staff, contractors, third-party designers, education agents acting on behalf of SPI Agents and collaborative partners.

3. Policy Statement

3.1 All marketing material of SPI must be developed, approved and reviewed in accordance with this policy and procedure.

3.2 All marketing material of SPI must be developed, approved and reviewed in alignment with:

- Higher Education Standards Framework (Threshold Standards) 2021 (HESF 2021)
- Education Services for Overseas Students Act 2000
- Education Legislation Amendment (Integrity and Other Measures) Act 2025
- Standards of National Code of Practice for Providers of Education and Training to Overseas Students 2018
    - Standard 2 Recruitment of an overseas student;
    - Standard 3 Formalisation of enrolment and written agreements;
    - Standard 6 Overseas Student support services.
- Code of Ethics set out by the Australian Association of National Advertisers

3.3 All marketing materials/information must:

- be developed in plain English;
- be factually accurate and ethical;
- be up-to-date;
- be transparent, clear and easy to understand;
- maintain the integrity and reputation of SPI; and
- not contain any inaccurate, inappropriate, false or misleading information (e.g. unrealistic expectations about visa outcomes, migration outcomes, work rights, employment outcomes, scholarships, fees, or student support), and be consistent with Australian Consumer Law,
- be supported by adequate recordkeeping in relation to education agents and recruitment activity;
- be consistent with approved course information, admissions requirements, student obligations, and PRISMS records;
- not create unrealistic expectations about visa outcomes, migration outcomes, work rights, employment outcomes, scholarships, fees, or student support;
- appropriately reflect the Genuine Student (GS) requirement and not encourage non-genuine recruitment;
- be approved by the correct authority before publication; and
- be recorded in a central Marketing Collateral Register with version control and review status..
- be evidenced during internal audit, TEQSA review, ESOS compliance review, and Governing Council oversight.

4. Responsibilities

4.1 The Marketing Manager is responsible for:

- approving standard marketing material (see the details in Section 5.3.2) that is accurate, true, transparent, clear and ethical;
- ensuring the development, approval and review of Marketing Material is in alignment with relevant legislative and regulatory requirements;
- obtaining CEO approval for Critical Marketing Materials prior to publication.
- reviewing the marketing material for compliance with the SPI's identity;
- ensuring that all marketing materials contribute to the reputation of SPI;
- ensuring that all marketing, promotional and student recruitment materials, including educational offerings and charges, are accurate and appropriate from a technical, academic and compliance perspective. This includes ensuring that agents accurately represent SPI and all marketing information published on the SPI website is relevant and accurate;
- maintaining the Marketing Collateral Register and coordinating review cycles, and ensure implementation of this Policy and Procedure.

4.2 The CEO has the responsibilities to:

- provide strategic oversight and direction regarding SPI's marketing activities and

priorities;
- ensure that any marketing material fits the purpose needed by SPI;
- review and approve critical marketing materials (see the details in Section 5.3.1) prior to it being published, in compliance with the SPI's identity.
- ensure critical marketing materials align with SPI's approved institutional identity, strategic direction, and regulatory obligations.

4.3 The Student Recruitment Team is responsible for:
- reviewing agent-facing and recruitment materials for compliance, operational accuracy, admissions accuracy, and consistency with current offers and processes.

4.4 The Compliance / Delegated Reviewer is responsible for:
- reviewing marketing materials containing regulatory, Genuine Student, PRISMS, policy, student rights, visa-related, or other compliance-sensitive content prior to publication;
- ensuring, within their area of responsibility, that such content is accurate and compliant with applicable legislative and regulatory requirements prior to approval or publication.

4.5 Marketing Team and Content Authors are responsible for:
- preparing draft materials, verifying source information, applying version control, and ensuring no material is published without documented approval.

4.6 Education Agents and Third Parties:
- must only use SPI-approved materials;
- must promptly remove or cease using superseded or withdrawn marketing materials upon notification by SPI;
- must not alter approved content without prior written approval from SPI; and
- any breach of this requirement, including the use of unapproved or altered materials, inaccurate, or outdated marketing materials, will be managed in accordance with the *SPI Education Agent Appointment, Monitoring and Termination Policy & Procedure*, and may result in corrective action, termination of the agency agreement, or other consequences as set out in that policy.

5. Procedures

5.1 Marketing Material Identification and Classification Procedure

5.1.1 All marketing materials must be identified and classified prior to publication to ensure the appropriate approval pathway, review frequency, and compliance controls are applied.

5.1.2 SPI identifies and differentiates between types of marketing material:

- Marketing Brochure or Booklet
- Student Recruitment Material

- Promotional Material
- Website Material

5.1.3 For approval purposes, materials must also be classified as either:

- Critical Marketing Materials; or
- Standard Marketing Materials

5.2 Marketing Material Development and Review Procedure

5.2.1 General Requirements

All marketing materials must:

- be prepared using approved and current institutional information;
- be checked against relevant source documents where regulated or sensitive information is included; and
- not be published, distributed, or externally shared until the required approval has been obtained.

Any major change to:

- the course and unit content or delivery,
- student enrolment arrangements,
- SPI's resources or facilities,
- SPI's policies and procedure,

must be updated in the marketing materials within thirty (30) business days, or earlier where required to maintain the accuracy of information provided to prospective and current students.

5.2.2 Marketing Brochure or Booklet

- SPI's Marketing Brochure or Booklet is a fixed marketing item that has a shelf life of one year. All Marketing Brochure or Booklet must be subject to an annual review, plus additional reviews as required.
- During review, all content must be reassessed to ensure accuracy, currency, consistency with approved institutional information, and compliance with applicable regulatory requirements.
- Following review and approval, updated materials may be printed, distributed, or published through approved institutional channels.

5.2.3 Student Recruitment Material

- All Student Recruitment Material must be subject to review every teaching period, plus additional reviews as required.
- Such reviews will also be used to check the accuracy of the information and update the material where necessary to ensure consistency and compliance with Australian Consumer Law and HESF Standard 7.1.1.

5.2.4 Promotional Material

- Promotional Material will be developed throughout the year to support campaigns, recruitment activities, events and promotional activities.

5.2.5 SPI Website Materials

- Marketing and recruitment materials published on SPI's website must remain accurate, current, and appropriately maintained.
- Approved updates to website content should ordinarily be implemented within seven (7) working days where practicable. Outdated or superseded information must be updated, archived, or removed in a timely manner.

5.3 Marketing Material Approval Procedure

All marketing materials must be reviewed and approved prior to publication in accordance with their classification and approval requirements.

5.3.1 Critical Marketing Materials

Critical Marketing Materials must be reviewed by the Marketing Manager for accuracy and compliance, and approved by the CEO prior to publication.

Critical Marketing Materials include any materials, including website content, containing:

- course structure or requirements;
- admissions criteria;
- student rights and obligations;
- GS-related statements;
- refund or fee;
- PRISMS-related information;
- compliance-related content; or
- information likely to be materially relied upon by students in making enrolment decisions.

This includes, but is not limited to

- Annual Course Guides;
- Student Handbooks;
- Graduation Booklets.

5.3.2 Standard Marketing Materials

Standard Marketing Materials must be reviewed and approved by the Marketing Manager prior to publication.

These include routine promotional and recruitment materials that do not introduce or amend critical compliance-related information, including:

- brochures and flyers;
- social media posts;
- campaign advertisements;
- event collateral and posters;
- agent presentations; and
- general website updates.

5.4 Marketing Collateral Register Procedure

The Marketing Manager is responsible for maintaining a central Marketing Collateral Register for published marketing materials and ensuring records remain up to date.
The Register must include, at minimum:

- document name;
- material type;
- material classification (Critical / Standard);
- version number;
- responsible staff member;
- approval authority;
- approval date;
- publication or release date;
- review date;
- document status (Draft / Active / Archived / Superseded); and
- publication location or communication channel (e.g. website, print, social media, email, agent materials, or events).

5.5 Version Control and Document Review Procedure

- All marketing materials must contain a version number and date where operationally practicable. For short-form digital content where version stamping is not practical, version and approval records must be maintained within the Marketing Collateral Register.
- Critical Marketing Materials must be reviewed at least annually, and earlier where there are material changes to courses, fees, admissions requirements, student policies, legislation, regulatory obligations, or other information likely to affect the accuracy of the material.
- Standard Marketing Materials must be reviewed periodically and updated where material changes to institutional information, campaigns, or promotional content occur.
- Updated marketing materials must replace superseded versions across relevant publication and distribution channels as soon as practicable following approval.
- Outdated or superseded materials must be removed from active circulation and appropriately archived.
- Education agents and relevant staff must be provided with updated versions of approved marketing materials where material changes have been made.

5.6 Compliance Review and Publication Control Procedure

- Marketing materials distributed by education agents or third parties must align with the

SPI-approved version. Agents must not create, modify, or materially amend SPI-branded content without prior written approval from SPI.

- All marketing materials must contain a version number and date where operationally practicable. For short-form digital content where version stamping is not practical, version and approval records must be maintained within the Marketing Collateral Register.

5.7 Monitoring Procedure

The Marketing Manager, in consultation with relevant staff where appropriate, will monitor marketing materials and their use on an ongoing basis through:

- spot-checking website content, digital campaigns, and social media publications;
- reviewing agent-distributed materials and event collateral;
- cross-checking key student-facing information against approved institutional information and PRISMS data where applicable; and
- reviewing complaints, student feedback, staff feedback, and audit findings relating to inaccurate, misleading, outdated, or inconsistent content.

5.8 Risk Indicators and Escalation Procedure

The following indicators may trigger immediate review, withdrawal, escalation, or corrective action:

- inconsistent information across communication channels;
- outdated fees, course information, or admissions requirements;
- misleading statements relating to visa outcomes, employment outcomes, scholarships, transfer arrangements, or student support;
- use of unapproved or altered marketing materials by education agents or third parties; and
- material inconsistencies between published information, PRISMS data, or approved institutional records.

Where a high-risk issue is identified, the Marketing Manager must escalate the matter to the CEO and coordinate appropriate corrective action.

Where the issue involves an education agent or third party, the matter must also be referred to the relevant staff responsible for education agent monitoring and managed in accordance with SPI's *Education Agent Appointment, Monitoring and Termination Policy and Procedure*.

Notes

Related legislation:

Education Legislation Amendment (Integrity and Other Measures) Act 2025
ESOS Act 2000
ESOS Act (2000) incorporating National Code 2018

Higher Education Standards Framework (Threshold Standards) 2021

Related documents:

SPI Education Agent Appointment, Monitoring and Termination Policy & Procedure
SPI Student Orientation Policy
SPI Marketing Plan

Amendment History:

Version No.	Approved by	Effective date	Amendments
1.0	Governing Council	27/08/2021	New Policy
1.1	Governing Council	29/01/2022	Amendments made to Sections 3.3, 4.1 and 5
2.0	Governing Council	14/5/2026	Policy revised to strengthen governance and compliance controls relating to marketing materials.