Marketing Policy and Procedure

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A. Overview

i. The Lead Institute of Higher Education ('the Institute' or 'LIHE') Marketing Policy and Procedure ('the Policy') sets out the principles, standards and approval processes that govern the marketing, advertising, promotion and recruitment activities undertaken by, or on behalf of, LIHE. This Policy establishes the responsibilities of LIHE staff, contractors and education agents in relation to the accuracy, integrity and compliance of all marketing materials and should be read in conjunction with the Student Selection and Admission Policy and Procedure and the Education Agent Management Policy and Procedure.

ii. This Policy is designed to align with the Higher Education Standards Framework (Threshold Standards) 2021, specifically Standard 7.2 (Information for prospective and current students), and with the National Code of Practice for Providers of Education and Training to Overseas Students 2018, specifically Standard 1 (Marketing and information for prospective and current students).

iii. Definitions

For definitions, please refer to the table below:

Term	Definition
Marketing material	Any content produced, published or authorised by, or on behalf of, LIHE for the purpose of promoting LIHE, its courses, services or outcomes, including print, broadcast, outdoor, digital, social media, website and email content.
Advertising	A form of marketing material intended to publicly promote LIHE's courses, brand or services to prospective students or the general public, whether paid or unpaid.
CRICOS	The Commonwealth Register of Institutions and Courses for Overseas Students, which lists education providers and courses approved to deliver education to overseas students on a student visa.
CRICOS provider code	The unique registration number issued to LIHE under CRICOS, which must be disclosed on marketing material directed at prospective overseas students.
Education agent	An individual or organisation engaged under a written agreement with LIHE to recruit, or provide advice to, prospective students on LIHE's behalf, consistent with National Code 2018, Standard 4.
ESOS Act	The Education Services for Overseas Students Act 2000 (Cth), the primary legislation governing the delivery of education to overseas students in Australia.
National Code	The National Code of Practice for Providers of Education and Training to Overseas Students 2018, made under the ESOS Act, which sets standards for provider conduct, including marketing.
Misleading or deceptive conduct	Conduct, including in advertising or marketing, that is likely to create a false or inaccurate impression in the mind of a reasonable

Term	Definition
	prospective student, whether or not intended, as prohibited under the Australian Consumer Law.
Testimonial	A statement, quote, review, image or endorsement attributed to a current or former student, staff member or other individual and used in marketing material to represent their experience of, or view on, LIHE.
Approval process	The internal review and sign-off procedure set out in Section L of this Policy that all marketing material must pass through prior to publication or distribution.
Marketing Materials Register	The record maintained by the Marketing Manager of all approved marketing material, including its approval date, custodian and scheduled review date.
Prospective student	A person who has made, or may reasonably be expected to make, an enquiry about, or application for, enrolment in a LIHE course.

B. Scope

This Policy applies to all marketing, advertising, promotional and recruitment materials and activities produced, published or authorised by LIHE, regardless of format or medium, and to all staff, contractors, education agents and third parties acting on LIHE's behalf, in Australia and overseas.

C. Policy Principles

This Policy is underpinned by the following principles:

i. All marketing and advertising material is accurate, current, accessible and not misleading, whether by inclusion or omission;

ii. Marketing material enables prospective students to make informed decisions about their study options, including a genuine understanding of the course, its outcomes, and the obligations of enrolment;

iii. LIHE's CRICOS registration status, provider details and course information are represented accurately and consistently across all channels;

iv. Claims regarding employment outcomes, migration outcomes, articulation, credit transfer or professional accreditation are only made where they are current, verifiable and appropriately qualified;

v. Marketing practices comply with the Australian Consumer Law (Schedule 2 of the Competition and Consumer Act 2010), the ESOS Act 2000, the National Code 2018, and the Higher Education Standards Framework 2021;

vi. The use of LIHE's brand, logo and visual identity is controlled and consistent, protecting the reputation and integrity of the Institute;

vii. Marketing materials are reviewed and approved prior to publication or distribution; and

viii. Education agents and third parties marketing on behalf of LIHE are bound by the same standards of accuracy and integrity as LIHE staff.

D. Regulatory and Legislative Compliance

i. General requirements

All marketing and advertising activity must comply with the following instruments, as amended from time to time:

a. Higher Education Standards Framework (Threshold Standards) 2021, Standard 7.2;

b. Education Services for Overseas Students (ESOS) Act 2000;

c. National Code of Practice for Providers of Education and Training to Overseas Students 2018, Standard 1;

d. Competition and Consumer Act 2010 (Cth), including the Australian Consumer Law provisions on misleading or deceptive conduct;

e. Tertiary Education Quality and Standards Agency (TEQSA) guidance on advertising and marketing by higher education providers; and

f. Spam Act 2003 (Cth) and the Privacy Act 1988 (Cth), where marketing involves direct electronic communication or the use of personal information.

ii. CRICOS-specific requirements

Where marketing material is directed at prospective overseas students, it must disclose LIHE's CRICOS provider name and CRICOS provider code, and must not imply or guarantee a migration outcome, permanent residency, or automatic pathway to another provider unless a formal articulation agreement exists and is accurately described.

E. Brand Identity, Logo and CRICOS Registration

i. The LIHE logo, brand colours, typography and visual identity must only be used in accordance with the LIHE Brand Guidelines and must not be altered, distorted or combined with third-party branding without written approval from the Marketing Manager.

ii. All external-facing marketing material must display LIHE's full registered name, CRICOS provider code and or accrediting body details in accordance with regulatory requirements.

iii. Use of the LIHE logo or brand assets by education agents, partner institutions or third parties requires a current, signed agreement that specifies the permitted use and requires LIHE approval prior to publication.

iv. Unauthorised or outdated use of LIHE's brand identity must be reported to the Marketing Manager and remediated as a priority.

F. Advertising and Promotional Standards

The following standards apply to all advertising and promotional content, including print, broadcast, outdoor, digital and social media:

i. Content must be truthful, current and capable of substantiation at the time of publication;

ii. Course titles, AQF levels, duration, delivery mode, location, fees and entry requirements must match the information published in the relevant Unit Outline, Course Handbook and CRICOS registration;

iii. Material must not create a false or misleading impression about LIHE's facilities, staff qualifications, accreditation status, graduate outcomes, or partnerships with other institutions or industry bodies;

i. Promotional pricing, scholarships, fee waivers or discounts must clearly state eligibility criteria, conditions and the period of validity;

ii. Superlative or comparative claims (for example, 'best', 'top-ranked', 'guaranteed') must not be used unless supported by verifiable, cited evidence; and

iii. All advertising material must be dated and version-controlled to enable withdrawal or correction if information changes.

G. Course, Fee and Pathway Information

i. Course information published for marketing purposes must be sourced from, and consistent with, the current Course Handbook, Unit Outlines and the CRICOS Course List.

ii. Total course fees, indicative additional costs (such as materials, placements or resources) and the fee refund policy must be clearly disclosed to prospective students before enrolment, in line with National Code 2018, Standard 3.

iii. Information regarding credit transfer, advanced standing, or articulation into other courses or providers must reference the applicable Advanced Standing Policy and Procedure or Articulation Agreement, and must not be presented as automatic or guaranteed unless it is.

iv. Any change to course structure, fees, entry requirements or delivery arrangements that affects published marketing material must be updated across all channels within 10 working days of the change taking effect.

H. Marketing to Prospective Overseas Students

i. Marketing material directed at prospective overseas students must provide accurate information about course entry requirements, English language requirements, tuition fees, likely additional costs, and the study and living costs in Australia, consistent with National Code 2018, Standard 1.

ii. Marketing material must not make representations about opportunities to work in Australia during or after study, or about pathways to permanent residency, beyond what is factually correct and current under Australian migration law.

iii. Where LIHE engages in offshore marketing activities (including education fairs, offshore representatives or digital campaigns targeted at overseas markets), such activities must be conducted in accordance with this Policy and applicable Australian and host-country regulations.

iv. Prospective overseas students must have access to current, accurate information about LIHE's CRICOS registration, refund policy, and the Overseas Student Ombudsman prior to accepting an offer.

I. Use of Education Agents

i. LIHE only engages education agents who have entered into a current written agreement with the Institute, consistent with National Code 2018, Standard 4.

ii. Education agents must only use marketing material that has been approved by LIHE and must not produce their own promotional content about LIHE's courses, fees or outcomes without prior written approval.

iii. Agent commission structures must not be presented to students, and agent remuneration must not influence the accuracy or content of information provided to prospective students.

iv. LIHE monitors agent conduct and marketing activity through periodic review, and reserves the right to suspend or terminate an agent agreement where marketing standards are breached.

J. Digital and Social Media Marketing

i. All LIHE-branded websites, landing pages, social media accounts and digital advertisements must be approved by the Marketing Manager prior to launch and are subject to the same accuracy and compliance standards as printed material.

ii. Staff posting on official LIHE social media channels must adhere to the Social Media Guidelines and must not publish unverified claims, student results, or confidential information.

iii. Search engine advertising, display advertising and email marketing must comply with the Spam Act 2003 (Cth), including providing a clear and functional unsubscribe mechanism for commercial electronic messages.

iv. Any use of student data or website analytics for targeted marketing must comply with the Privacy Act 1988 (Cth) and LIHE's Privacy Policy.

K. Testimonials, Endorsements and Student Imagery

i. Written or informed consent must be obtained from any current or former student, staff member or third party before their name, image, likeness, quote or testimonial is used in marketing material.

ii. Consent forms must specify the intended use, duration and platforms on which the material will appear, and individuals may withdraw consent for future use at any time by notifying the Marketing Manager.

iii. Testimonials must reflect the genuine views of the individual and must not be edited in a way that materially changes their meaning or creates a misleading impression of typical student experience or outcomes.

iv. Images and case studies depicting graduate employment outcomes must be accompanied by an appropriate disclaimer where outcomes are not representative of the general student cohort.

L. Approval Process for Marketing Materials

All marketing and advertising material must proceed through the following approval process prior to publication or distribution:

Stage	Responsible	Description
1. Draft	Marketing Officer	Material is drafted with reference to current, approved course and fee information.

Stage	Responsible	Description
2. Compliance check	Marketing Manager	Content is checked for accuracy against the Course Handbook, CRICOS registration and this Policy.
3. Academic sign-off	Course Director / Dean	Course-specific claims, outcomes and academic content are verified.
4. Final approval	Dean or CEO	Final approval is granted and the material is logged in the Marketing Materials Register prior to publication.
5. Post-publication review	Marketing Manager	Published material is periodically reviewed for currency and withdrawn or updated where information changes.

i. Urgent or minor corrections to existing approved material (for example, correcting a typographical error) may be approved directly by the Marketing Manager, provided the correction does not alter the substance of any claim.

M. Market Research and Data Use

i. Market research, surveys and data analysis undertaken to inform recruitment and marketing strategy must be conducted ethically and in accordance with LIHE's Privacy Policy.

ii. Aggregated recruitment, conversion and enrolment data may be used to inform marketing strategy and Governing Council reporting, but individual student data must not be published or shared externally without consent.

iii. Competitor analysis and sector benchmarking must be sourced from publicly available or lawfully obtained information.

N. Quality Assurance, Monitoring and Review

i. The Marketing Manager maintains a Marketing Materials Register recording all approved material, its approval date, custodian and review date.

ii. All published marketing and advertising material is reviewed at least annually, and immediately following any change to course information, fees, CRICOS registration or regulatory requirements.

iii. The Dean may approve minor updates to marketing content; however, material changes to claims regarding outcomes, accreditation or partnerships must be approved by the CEO.

iv. Internal audits of marketing compliance are conducted periodically and reported to the Governing Council, consistent with LIHE's Quality Assurance Policy.

O. Breaches, Complaints and Corrective Action

Where marketing material is found, or alleged, to be inaccurate, misleading or non-compliant with this Policy:

i. The material must be withdrawn from publication or distribution as soon as practicable, and corrected material republished where appropriate;

ii. Any affected prospective or current student must be provided with accurate information without delay;

iii. The matter must be recorded in the Marketing Materials Register and reported to the Dean and, where relevant, the ESOS Compliance Officer; and

iv. Complaints from students, staff or the public regarding marketing conduct may be lodged in accordance with the Student Grievance Policy and Procedure or the Staff Grievance Policy, as applicable.

Version Control

Version	Approved by	Approval Date
1	Governing Council	12/10/2026
Next Review	**Custodian**	**Effective Date**
Refer to the Policy Documents Review Schedule	Dean	12/10/2026
Related Documents	Student Selection and Admission Policy and Procedure and the Education Agent Management Policy and Procedure Privacy Policy Student Grievance Policy and Procedure Quality Assurance Policy	
References and Legislations	National Code of Practice for Providers of Education and Training to Overseas Students 2018 Higher Education Standards Framework (Threshold Standards) 2021 Education Services for Overseas Students (ESOS) Act 2000 Competition and Consumer Act 2010 (Cth) — Australian Consumer Law Spam Act 2003 (Cth) Privacy Act 1988 (Cth)	