



Title:

International Marketing Policy

Version	0.1
TRIM file number	
Short description	A policy on international marketing in accordance with the University's approved procedures, ESOS regulations and other relevant compliance requirements.
Relevant to	Staff within the Division of Marketing Staff within the Office of International Relations Staff within the Faculties All staff
Authority	This Policy has been approved by the Executive Council under the <i>Governance (Policy and Procedures) Rule 2005</i> of the Council and sections 20 and 32 of the <i>CSU Act</i> .
Responsible officer	Director, Division of Marketing
Responsible office	Division of Marketing
Date introduced	June, 2009
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Next scheduled review date	June, 2011
Related University documents	Agent Policy, Establishment of International Agreements Policy, Style Manual
Related legislation	Privacy and Personal Information Protection Act 1998 Copyright Act 1968 Copyright Amendment Act 2006 ESOS Act 2000
Key words	Policy, international marketing, education agent, interim agent, international recruitment representative, course provider.

1. PURPOSE

The purpose of this policy is to ensure that the University maintains a coordinated response to international marketing and presents a consistent, consolidated and coordinated public image in the international market that complies with relevant acts and regulations.

It outlines the responsibility of various parties in relation to international marketing and ensures that all operations and activities are conducted in a way that ensures the University meets its legal obligations.

2. SCOPE

This policy covers marketing CSU internationally, which is the joint responsibility of both the Division of Marketing and the Faculties. In meeting this responsibility, the Division aims to work collaboratively with the Office of International Relations, other areas of the University and external stakeholders to develop a strong and integrated approach to international marketing, in line with the strategic direction of the University (particularly the Internationalisation Strategy) and in line with government and industry regulations (including the ESOS Act, National Code and AVCC Guidelines).

3. DEFINITIONS

Course providers

Course providers are institutions, located in Australia or overseas, that are contracted to deliver CSU programs. These contracts are managed by the Office of International Relations.

Articulation pathways

These are courses provided by institutions located in Australia or overseas with which CSU has an agreement to give a certain amount of credit into a CSU degree. In this way, students can articulate to CSU programs and reduce the number of subjects they complete.

International recruitment representative

An international recruitment representative (IRR) is an education recruitment agent whom CSU engages to formally represent the University under an IRR Agreement. These agents are authorised to represent the University and are paid commission.

Interim agent

An interim agent is an education recruitment agent who has not been approved by CSU to formally represent the University on a full IRR Agreement. However, CSU will accept a student application from such an agent if they sign an Interim IRR Agreement for each student application submitted. The interim agent agreement is only valid for the time it takes to process that particular student application.

4. MARKETING INFORMATION AND PRACTICES

The Australian Government wants overseas students in Australia to have a safe, enjoyable and rewarding place to study. Australia's laws promote quality education and consumer protection for overseas students. These laws are known as the 'ESOS framework' and they include the:

- Education Services for Overseas Students (ESOS) Act 2000
- National Code of Practice 2007.

The University must also abide by the:

- Australian Vice-Chancellors' Committee Code of Practice (see <http://www.avcc.edu.au/documents/publications/CodeOfPracticeAndGuidelines2005.pdf>).
- Trade Practices Act (see <http://www.accc.gov.au/content/index.phtml/itemId/788579/fromItemId/3653>).
- In-country regulations relevant to the recruitment of or marketing to prospective students.

The University will ensure that the marketing of its education and training services is accurate and ethical, and maintains the integrity and reputation of the higher education industry.

4.1 Clear identification of the University

Standard one of the National Code requires the clear identification of the University's name and CRICOS provider number on all University stationery and in written marketing material and other material for students, including electronic form. The University's name and CRICOS provider number must be included in the footer of the website and on all marketing materials.

- Shortened version: CRICOS Provider Numbers for Charles Sturt University: 00005F (NSW), 01947G (VIC) and 02960B (ACT).
- Full version: The Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) Provider Numbers are 00005F (NSW), 01947G (VIC) and 02960B (ACT) for Charles Sturt University.
- CSU Advertisements: CRICOS Provider Codes: 00005F(NSW), 01947G(VIC), 02960B(ACT)

Each course offered in Australia must have its own CRICOS code before it can be advertised to international students. Course CRICOS codes must be published in marketing material.

4.2 International Marketing Material

Following the development of strategy (and marketing/recruitment plans), the Division of Marketing will produce international marketing communications that are market sensitive and compliant with the ESOS Act, National Code, AVCC Guidelines, Trade Practices Act and any local regulations.

All electronic and printed marketing materials including websites and advertisements must clearly identify CSU's course provider's name and CRICOS number/s, where applicable, and not contain false or misleading information or advice in relation to:

- claims of association between CSU and other providers
- the employment outcomes associated with a course
- automatic acceptance into another course
- possible migration outcomes, or
- any other claims relating to CSU, our courses or outcomes associated with CSU courses.

4.3 Responsibilities in relation to marketing information and practices

The responsibility for international marketing information and practices at Charles Sturt University is shared. While all staff have a role to play in marketing the University, specific responsibility resides with a number of areas:

The Division of Marketing is responsible for:

- The overall management of CSU's brand and reputation through the CSU course providers, articulation pathways and University activities, including the approval of marketing plans and materials (print, web and advertising) produced by agents, course providers and articulation institutions.
- The collection, coordination, collation and dissemination of up-to-date market research provided by government or independent organisations and bodies, current customers and Alumni in order to support Faculty or Divisional initiatives in relation to international student recruitment and, where possible, benchmarking CSU against like institutions and reporting on significant trends.
- Ensuring the compliance of all marketing materials and activities conducted by the Division in accordance with the ESOS Act, National Code, AVCC Guidelines, Trade Practices Act and in-country regulations, to ensure the University is represented in a professional manner, maintaining the integrity and reputation of the Australian higher education industry.
- Keeping a register of materials produced and samples of promotional material used to market and recruit students.
- Keeping evidence of arrangements with other providers and the materials used to promote courses that are taught by them.
- Documenting the process for signing off promotional material and providing evidence of updating materials when necessary.
- The planning, development and distribution of international marketing materials as requested, and maintaining an inventory of stock quantities.
- Providing staff travelling overseas or staff marketing to international students with up-to-date marketing materials.
- Inquiry management of prospective international students and agents through info.csu.
- Overseeing the ethical and accurate advertising and media in Australia and overseas.

The Faculty is responsible for:

- Proactively seeking new markets internationally and developing appropriate relationships and articulation pathways.
- Ensuring all Faculty activities are undertaken in accordance with the ESOS Act, National Code and AVCC Guidelines.

The Office of International Relations is responsible for:

- Supporting Faculties to identify, develop and manage appropriate relationships and articulation pathways.

5. INTERNATIONAL STUDENT RECRUITMENT

The University's Internationalisation Strategy clearly outlines the University's focus for recruitment of international students and international education activities. The University aims to recruit students:

- into course provider programs, domestically and internationally; and
- into CSU courses offered on campus in Australia or by distance education.

5.1 Course Providers

The University has a number of contractual arrangements with institutions in Australia and overseas who deliver CSU courses. While the responsibility for recruitment resides with the course provider, these arrangements require marketing support and governance in relation to the use of CSU's name and logo and compliance of marketing materials with the ESOS Act, National Code and AVCC Guidelines.

5.1.1 Responsibilities in relation to course providers

While Course Providers are responsible for recruitment into their programs, the Division of Marketing is responsible for the quality assurance of marketing activities undertaken by these providers, including approval of marketing plans and materials and the management of course providers' use of the University brand.

Specifically the division of Marketing will:

- Provide approval for the use of logo and any marketing/advertising material developed to promote CSU programs, in accordance with CSU's brand usage guidelines.
- Guide and approve any annual marketing and recruitment activities/plans.
- Provide CSU course brochures, application forms and other marketing materials as required.
- Ensure CSU programs or approved courses are marketed with integrity and accuracy and ensure any activities are conducted in accordance with applicable regulations in Australia and in their country including:

ESOS Act -

[http://www.comlaw.gov.au/ComLaw/Legislation/ActCompilation1.nsf/0/ED0E76F3E05DFBFCA25752400184EC9/\\$file/EduSerforOverStud2000_WD02.pdf](http://www.comlaw.gov.au/ComLaw/Legislation/ActCompilation1.nsf/0/ED0E76F3E05DFBFCA25752400184EC9/$file/EduSerforOverStud2000_WD02.pdf)

National Code of Practice -

http://aei.gov.au/AEI/ESOS/NationalCodeOfPractice2007/National_Code_2007_pdf.pdf

AVCC Guidelines -

<http://www.universitiesaustralia.edu.au/documents/publications/CodeOfPracticeAndGuidelines2005.pdf>

- Provide the necessary support to University staff travelling overseas on University business through the provision of training, advice and appropriate marketing materials.

- Provide CSU staff, where necessary and appropriate, to attend admissions exercises, careers fairs, interviews and other activities.
- Maintain ongoing relationships with the marketing staff of Course Provider institutions to ensure options for international study are maximised at both institutions.

The Faculty is responsible for:

- Development of domestic and trans-national programs with appropriate Course Providers
- Assisting with the marketing of these programs where possible.

The Office of International Relations is responsible for:

- Working closely with the Faculties to identify, drive and manage partnerships including course delivery programs.

The Course provider is responsible for:

- Ongoing marketing and recruitment for these programs.

5.2 On campus in Australia and Distance Education study

The University recruits students from various countries to study on campus and by distance education. The Division is responsible for the development of marketing strategy for the recruitment of international students to its on campus and distance education courses through:

- Agents
- Exhibitions and events
- Online (website)

It also supports the Faculties in the recruitment of students from

- Course providers or through articulation pathways.

The Division works with the Faculties to help develop marketing priorities and initiatives. The focus is on countries where the University has existing brand leverage, however activity still occurs in other countries.

5.2.1 International Recruitment Representatives (Agents)

The University relies on international education agents to recruit to on campus and distance education programs. The role of the agent is to submit a student's application to the University. The agent is also responsible for providing the student with accurate and comprehensive information, and ensuring the required and verified documents are attached to the application. The agent recruiting for on campus study will also assist the international student with his/her visa application to the Australian Government.

The University must enter into a written agreement with each education agent it engages to formally represent it. At this stage the agent becomes an International Recruitment Representative (IRR) of CSU. CSU must not accept students from an education agent or enter into an agreement with an education agent if it knows or reasonably suspects the education agent to be:

- (a) engaged in, or to have previously been engaged in, dishonest practices, including the deliberate attempt to recruit a student where this clearly conflicts with the obligations of registered providers under Standard 7 (Transfer between registered providers)
- (b) facilitating the enrolment of a student who the education agent believes will not comply with the conditions of his or her student visa
- (c) using Provider Registration and International Students Management System (PRISMS) to create Confirmations of Enrolment for other than a bona fide student
- (d) providing immigration advice where not authorised under the Migration Act 1958 to do so.

CSU must:

- Provide IRRs with marketing material that complies with Government regulations.
- Ensure IRRs are aware of Australian Government regulations and that the IRRs comply accordingly.
- Ensure there are checks in place to monitor this compliance.

5.2.2 Exhibitions and events

International student exhibitions are displays that occur throughout the year in a number of key markets in Australia and overseas, hosted and supported by IDP Education Pty Ltd (IDP), Australian Education International (AEI), Austrade, or other agencies, organisations or governments.

The Division of Marketing does not invest a lot of time and resources in such exhibitions but represents the University when it deems it to be valuable. Approval to participate in such exhibitions is required and should be sought from the Director of Marketing.

5.2.3 Online (website)

The Division of Marketing is responsible for the University's online presence and the promotion of international courses and study opportunities via the website [www.csu.edu.au].

5.2.4 Course Providers and articulation pathways

The Division of Marketing will also, where possible, promote opportunities to study in Australia to Charles Sturt University students currently studying through our contracted course providers or to students currently studying with articulation partners. This involves:

- The development of marketing materials to support and promote pathways
- Support for visiting academics and the quality assurance of their activities

5.3.5 Responsibilities in relation to on campus in Australia or Distance Education study

The Division of Marketing is responsible for:

- The development and implementation of strategy aimed at increasing international students studying on campus in Australia and by distance education (DE). This is achieved by:
 - working with the Faculties, Schools and Course Coordinators (in collaboration/consultation with the Office of International Relations) to develop strategies for the markets in which they are or seek to be active.
 - working with the Faculties to provide on campus study opportunities to students currently enrolled in trans-national education programs.
- Supporting the Faculties in their articulation arrangements and other Faculty initiatives by providing staff with the relevant marketing for on campus and distance education study, arranging appointments with key recruitment agencies and assisting with the provision of marketing presentations where possible.

Staff travelling overseas on University business are encouraged to make contact with the International Marketing Officer at least two months prior to their trip to discuss marketing support and should take the time to go through the Staff Information Pack developed by the Division of Marketing.

- The recruitment of international agents, including training, due diligence checks and the oversight of the University's agent management strategy, ensuring agents are recruiting for the University according to the ESOS Act, National Code and AVCC Guidelines. (See Agent Policy).
- The quality assurance of marketing activities undertaken by agents and supporting them with hard copy marketing material and other marketing support.

The Faculty is responsible for:

- Proactively seeking new markets internationally and developing appropriate relationships and articulation pathways.
- Ensuring all travelling staff undertake marketing activities, where possible, in conjunction with the Division of Marketing.
- Ensuring all Faculty activities are undertaken in accordance with the ESOS Act, National Code, AVCC Guidelines and any in country regulations/guidelines.

The Office of International Relations is responsible for:

- Managing contracts and maintaining a register of contracted IRRs.
- Issuing IRR agreements and payment of agent commissions.
- Terminating the IRR agreement if the University becomes aware of, or reasonably suspects, the engagement by the IRR, or an employee or sub-contractor of the IRR, of the conduct set out in Standard 4.