



**ECA**

**MARKETING**  
**Policies & Procedures**

Approved by  
Vice President of Student Acquisition

<b>Document Name</b>	Marketing Policies and Procedures		
<b>Approved by:</b>	Vice President Student Acquisition		
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<b>Responsible Officer</b>	Head of Marketing		
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<b>Applicable to</b>	<ul style="list-style-type: none"> <li>▪ Education Centre of Australia Pty Ltd ABN 14 11 191 8775 (CRICOS Provider Code 02644C)</li> <li>▪ The English Language School in Sydney (EL SIS) (CRICOS Provider Code 02644C)</li> <li>▪ ECA College (CRICOS Provider Code 02644C)</li> <li>▪ Advance Training Pty Ltd ABN 50 164 188 685 (CRICOS Provider Code 03637E)</li> <li>▪ The Australasian College of Care Leadership &amp; Management (CRICOS Provider Code 03637E)</li> <li>▪ Asia Pacific International College Pty Ltd ABN 48 061 101 488 (CRICOS Provider Code 03048D)</li> <li>▪ ECA Graduate Institute Pty Ltd ABN 81 128 584 896 (CRICOS Provider Code 02997M)</li> <li>▪ Higher Education Leadership Institute Pty Ltd ABN 71 606 961 451 (CRICOS Provider Code 03845H)</li> <li>▪ ECA Higher Education Institute Pty Ltd ABN 31 627 475 790 (CRICOS Provider Code 03932J)</li> <li>▪ Victoria University ABN 83 776 954 731 (Sydney &amp; Brisbane) (CRICOS Provider Code 02475D).</li> <li>▪ University of Canberra ABN 81 633 873 422 (Hills Campus, Castle Hill NSW) (CRICOS Provider Code 00212K)</li> <li>▪ University of Tasmania ABN 30 764 374 782 (Melbourne &amp; Sydney) (CRICOS Provider Code:00586B)</li> <li>▪ University of the Sunshine Coast (Adelaide) ABN 28 441 859 157 (CRICOS Provider Code:01595D)</li> </ul>		
<b>Related Documents</b>	Representative Agreement Education Centre of Australia Website: <a href="https://www.eca.edu.au/">https://www.eca.edu.au/</a>		
<b>References &amp; Legislation:</b>	<ol style="list-style-type: none"> <li>1. Education Services for Overseas Students Act 2000 (ESOS Act)</li> <li>2. National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code). Standards 1 and 4.</li> <li>3. Tertiary Education Quality and Standards Agency (TEQSA) &amp; Australian Skills Quality Authority (ASQA)</li> <li>4. Australian Consumer Law (ACL) &amp; Competition rules</li> <li>5. Privacy Act 1988 (APPs)</li> <li>6. The Spam Act 2003</li> </ol>		
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## 1. Purpose

This document outlines the policies and procedures governing all marketing activities and materials produced by ECA. It ensures compliance with Australian law and regulatory frameworks, including the ESOS Act, National Code 2018, TEQSA/ASQA requirements, Australian Consumer Law, Privacy Act, Spam Act 2003, and internal quality standards.

## 2. Scope

These policies apply to:

- All ECA brands, business units and campuses
- All domestic and international marketing materials
- All digital and offline campaigns
- Education agents and third-party partners marketing materials featuring ECA brands and courses
- Staff involved in marketing, recruitment, communications, and admissions

## 3. Definitions

<b>CRICOS:</b>	Commonwealth Register of Institutions and Courses for Overseas Students.
<b>Education Centre of Australia Pty Ltd. (ECA):</b>	ECA and its associated companies and partners provide tertiary level education across multiple campuses.
<b>Education Centre of Australia subsidiary and associated providers:</b>	As listed in the “Applicable to” section in the table above.
<b>ESOS Act:</b>	Education Services for Overseas Students Act 2000 of the Commonwealth of Australia.
<b>ESOS Regulations:</b>	Regulations made according to the Education Services for Overseas Students Act 2000 of the Commonwealth of Australia.
<b>International Student:</b>	A person who holds an Australian Student Visa and is an 'Overseas Student' as defined by the ESOS Act
<b>National Code 2018:</b>	National Code of Practice for Providers of Education and Training to Overseas Students 2018.
<b>PRISMS:</b>	Provider Registration and International Student Management System. Provides Australian education providers with the Confirmation of Enrolment (COE) facilities required for compliance with the ESOS Act.

<b>Prospective Student:</b>	A person who intends to become, or who has taken any steps towards becoming, a student an 'overseas student' or 'intending overseas student' as defined by the ESOS Act.
<b>Representative</b>	A person or organisation approved by the ECA with authority to promote ECA's programs and services to students or prospective students within the agreed terms outlined in the Representative Agreement.

### 3. Regulatory Compliance Framework

#### 3.1 ESOS Act 2000

- ECA must ensure all marketing targeting international students on student visas:
- Is accurate, ethical and not misleading
- Reflects only CRICOS-registered courses
- Uses the provider's legal name and CRICOS number where required

#### 3.2 National Code 2018 (Standard 1 and Standard 4)

Marketing must:

- Present current and correct information about courses, fees, entry requirements, and support services
- Avoid false or misleading claims about migration, employment, or visa success
- Be consistent across all channels and agents

Education agents must:

- Be monitored regularly
- Use only approved materials
- Not provide migration advice unless registered

#### 3.3 TEQSA and ASQA Requirements

Higher education and VET marketing must meet quality and accuracy standards regarding:

- Course outcomes
- Accreditation and qualification level
- Delivery mode and location

#### 3.4 Australian Consumer Law

All advertising must:

- Be truthful and not deceptive
- Clearly state fees, refund conditions, and material terms
- Avoid exaggerating employment or career outcomes

#### 3.5 Privacy Act 1988 (APPs)

Marketing activities must:

- Collect, store, and use personal information lawfully
- Display privacy notices on forms and digital tools
- Store student data securely

#### 3.6 Spam Act 2003

- All electronic marketing (email, SMS, WhatsApp, digital messaging) must:
- Only be sent with consent (express or inferred)

- Identify ECA as the sender
- Include a working unsubscribe method
- Honour unsubscribe requests within 5 business days

## 4. Policy

### 4.1 Policy Statement

ECA is committed to conducting all marketing and recruitment activities ethically, accurately, and in full compliance with Australian laws, international regulations, and internal quality standards.

### 4.2 Principles

- Marketing must always be truthful, current, and not misleading.
- All information provided to students must reflect actual course availability, fees, entry requirements, and support services.
- International marketing must comply with the ESOS Act and the National Code.
- Domestic marketing must comply with the Australian Consumer Law.
- All digital marketing must comply with the Privacy Act and Spam Act.
- Agents must represent ECA accurately and only use approved materials.
- Marketing practices must support ECA's reputation, student wellbeing, and regulatory obligations.

### 4.3 Governance

- The Marketing Manager is responsible for enforcing these policies.
- Compliance and Quality teams oversee regulatory alignment.
- Education Agents are bound by these policies through their contracts.

### 4.4 Mandatory Requirements

- Use only approved CRICOS codes on international materials.
- Include required disclaimers on employment and migration outcomes.
- Maintain brand consistency across all channels.
- Update course information within 30 days of any change.
- Ensure consent is collected for all email/SMS marketing.

## 5. Procedures

### 5.1 General Procedures

- All marketing activities must follow the regulatory frameworks in Section 3.
- Staff must verify accuracy before submitting materials for approval.
- All marketing drafts must be logged into the central asset register.
- Updates to course information must be reflected across all platforms.

### 5.2 Material Creation Procedure

- Draft content developed by Marketing Team member.
- Cross-check with compliance requirements (ESOS, National Code, TEQSA/ASQA, ACL, Privacy Act, Spam Act).
- Internal fact-check with Admissions and Academic teams.
- Review by Marketing Manager.

- Upload into approval workflow system.

### 5.3 Education Agent Marketing Procedure

- Provide agents only with approved marketing materials.
- Log distribution of updated materials.
- Conduct quarterly reviews of agent websites and social media activity.
- Document evidence of corrective actions.

### 5.4 Digital Marketing Procedure

- Verify that CRICOS codes and fee information are current.
- Ensure unsubscribe links function for all email/SMS campaigns.
- Maintain audit logs of consent for all leads.
- Collect, store, and use personal information lawfully.
- Display privacy notices on forms and digital tools.

### 5.5 Record Keeping Procedure

- All marketing assets must be archived for a minimum of 5 years.
- Compliance checks and approvals must be stored with each asset.

### 5.6. Monitoring, Reporting & Audit

- Implement ongoing monitoring and reporting of all marketing materials, both internal and agent-produced.
- Use the approval workflow system to track approvals, revisions, updates, and corrective actions.
- Schedule annual internal audits of marketing materials and agent compliance, with all findings and actions documented in the workflow system.
- Maintain records of approvals, training, and communications for offshore and third-party partners within the workflow system.
- Identify gaps, non-compliance, or risks and take immediate corrective action as needed.
- Conduct annual reviews of policy effectiveness, agent compliance, and corrective actions to ensure continuous improvement and alignment with regulatory and internal standards.

## 6. Marketing Approval Process

### 6.1 Required for All Materials

- Before publication, every marketing asset must undergo:
  - Content accuracy check
  - Compliance check (national standards, CRICOS, ESOS)
  - Branding and design review
  - Legal/consumer law compliance review for sensitive claims
  - Formal approval by Marketing Manager

### 6.2 High-Risk Content (requires additional approval)

- Claims about employment outcomes
- Scholarships, discounts or pricing changes
- New course launches
- International recruitment materials
- Agent communications or contracts

## 6.3 Marketing checklist

- Provider's full legal name displayed exactly as registered
- CRICOS provider code is included when course details are listed (for international students only)
- RTO code included when promoting VET courses (domestic and international students)
- Campus locations accurate (and match CRICOS listing)
- Course name matches official register
- Course duration correct
- AQF level accurate
- Delivery mode correctly stated
- Intake dates verified
- Pathways and articulation information are accurate
- Work placement details correct
- Tuition fees match the latest approved schedule
- Pricing is transparent, with no hidden costs
- Non-tuition fees correct
- Refund policy linked
- Scholarship information accurate
- No unapproved discounts
- No guarantees of PR, visas, migration outcomes, or fast processing
- No guaranteed employment claims
- Work rights described using Home Affairs wording
- Migration advice not given by non-MARA staff
- Student support services are accurately described
- Welfare and orientation information correct
- English support is described accurately
- Support contacts correct
- No guaranteed internships/jobs
- Employment statistics truthful and sourced
- Delivery reflects reality (on-campus/online/blended)
- Timetable information clearly marked as examples
- All marketing accurate, ethical, and unambiguous
- Images licensed and appropriate
- English proficiency requirements correct
- Entry requirements not simplified or omitted
- Only ECA-approved agent materials used, (Agents not allowed to edit artwork)
- Agent monitoring logs up to date
- Corrective actions documented
- Disclaimers used where needed
- Comparisons factual and evidence-based
- Student images used only with written consent
- Lead forms include privacy statement
- Sender identified for email/SMS
- Consent obtained for email/SMS
- Final Marketing Manager approval obtained
- Asset version control added and archived

## 7. Content Standards

### 7.1 Mandatory Information

All marketing materials must include:

- Full provider name

- CRICOS code where applicable
- Accurate fee information
- Correct entry requirements
- Campus locations and delivery modes

## 7.2 Prohibited Statements

Marketing must not:

- Guarantee migration outcomes
- Suggest visa issuance or work rights are guaranteed
- Exaggerate job placement rates or salaries
- Promise course availability without confirmation

## 7.3 Use of Images and Testimonials

- Must reflect real students or stock with correct licensing
- Testimonials must be genuine and verifiable

## 8. Digital Marketing Procedures

### 8.1 Websites

- Course information must be updated quarterly
- Fee and scholarship pages must always reflect current data
- CRICOS codes must appear on international student pages

### 8.2 Email & SMS

- Must comply with the Spam Act 2003
- Consent must be recorded in CRM
- All campaigns must include working unsubscribe options

### 8.3 Social Media

- Claims must be accurate and up to date
- Sponsored posts require compliance sign-off
- Comments that mislead users must be corrected or removed

### 8.4 Data Collection

- Lead forms must include privacy notice and consent statement

## 9. Offshore and Transnational Marketing

- When promoting offshore delivery or partnerships:
- Marketing must disclose delivery location, accreditation and awarding body
- Must comply with local country advertising laws where applicable
- Any dual award or pathway must be accurately described

## 10. Internal Responsibilities

## 10.1 Marketing Team

- Create, update, and approve all materials
- Maintain compliance with regulations

## 10.2 Acquisition Team

- Verify entry requirements and fee accuracy
- Review accuracy of academic claim
- Conduct agent audits

## 10.3 Education Agents

- Use only approved materials
- Represent ECA truthfully

## 10.4 Training and Awareness

- All ECA staff involved in marketing, recruitment, and admissions must complete mandatory compliance and ethics training.
- Training will be provided as part of the induction process for all new starters to ensure awareness of regulatory obligations and internal policies.
- Topics covered include the ESOS Act, National Code 2018, TEQSA/ASQA requirements, Australian Consumer Law, Privacy Act, Spam Act 2003, and ECA internal quality standards.
- Refresher training will be conducted annually, and records of completion will be filed and archived to support monitoring and reporting.

## 11. Review Cycle

This document must be reviewed every 12 months, or sooner if:

- Legislation changes
- CRICOS registrations change
- New delivery locations open
- New brands or products are launched