

Communication and Marketing Procedure

Purpose

1. This Procedure gives effect to the Communication and Marketing Policy and:
 - a) articulates the process for approval of marketing materials and information for prospective and current students prior to their dissemination;
 - b) guides practice in relation to news media and social media engagement.

Scope

2. This Procedure applies to all:
 - a) GHE staff, students (prospective and current) and members of governing bodies;
 - b) communications including forms, standard letters, qualification issuance documentation, advertising, media releases, broadcast messages, all materials approved for distribution to agents, digital publishing and print publications created by GHE staff.

Definitions

3. Definitions for key terms are presented in the Glossary of Terms which may be accessed on the GHE website at <https://www.globalhe.edu.au/policy>

Suite documents

4. This Procedure is linked to the Communication and Marketing Policy.

Procedure

Marketing material and information to students

5. All promotional and marketing material and information provided to prospective and current students must be designed and produced in accordance with the **Communications and Marketing Policy**, checked for compliance against the GHE Marketing Checklist and signed off by the Chief Executive Officer (or delegate). This applies at a minimum to the design and production of the following, in either hardcopy or softcopy irrespective of the medium of delivery:
 - a) print and broadcast advertising;
 - b) banner advertising and other corporate displays;
 - c) direct marketing;
 - d) newsletters, leaflets, brochures, posters;
 - e) videos and other multimedia presentations;
 - f) prospectus;
 - g) student handbooks;
 - h) official website;
 - i) social media sites;
 - j) podcasts;

- k) mobile applications;
 - l) formal correspondence including letters of offer;
 - m) official forms;
 - n) email correspondence with students, including email signatures.
6. The Chief Executive Officer ensures that marketing material and information provided to students is reviewed for currency and compliance, at a minimum on an annual basis, with the outcomes reported to the Board of Directors, including reporting of any incidents and improvement in practice.
 7. Irrespective of the requirement for annual review, marketing material and information provided to students must be reviewed for currency and compliance within two weeks of one or more changes being made to the following:
 - a) relevant legislation, regulations or standards;
 - b) brand guidelines;
 - c) CRICOS, TEQSA and other organisational identifier codes;
 - d) course CRICOS codes;
 - e) course attributes;
 - f) admission requirements;
 - g) student-facing policy and procedure;
 - h) other details in relation to the academic and corporate operation of GHE that have the potential to impact on prospective or current students' choices and actions in relation to their study.
 8. Where changes to electronic or softcopy marketing materials and information provided to prospective or current students are required, these changes will normally be completed within two weeks of the need for change being identified.
 9. Where changes to hardcopy marketing materials and information provided to prospective or current students are required, these materials will either be modified with the inclusion of an Addendum, application of a corrective overlay (sticker), or withdrawn from circulation, normally within four weeks of the need for change being identified.
 10. GHE will ensure that all agents appointed to represent GHE to prospective students are provided with approved updated information and materials as soon as possible in accordance with this Procedure and the **Agent Appointment and Management Policy**.

Engagement with news media

11. The Chief Executive Officer is the official media contact for GHE.
12. This role may be delegated by the Chief Executive Officer to an appropriate member of GHE staff, external member of governance boards, or student, depending on the particular issue.
13. Media comment will generally fall into three categories:
 - a) official GHE comment, including media releases;
 - b) academic or expert comment;
 - c) private individual comment.

Official GHE comment, including media releases

14. Members of staff, external members of governance boards, students and other affiliates are not permitted to make comment on behalf of GHE without approval of the Chief Executive Officer.
15. Any media inquiries or requests for official comment relating to GHE's policies, procedures or institutional activities are to be directed to the Chief Executive Officer.

16. The Chief Executive Officer may consult with the Board of Directors to seek advice, as required, to respond to the inquiry.
17. Any comment must not endorse, either directly or indirectly, any product or political campaign or candidate nor directly endorse any unofficial commercial arrangements or sponsorships.
18. All media releases are to be approved by the Chief Executive Officer or authorised representative. This is to ensure that:
 - a) the content of the media release is accurate, in the constructive interests of GHE and written in a professional and consistent style and tone;
 - b) information is conveyed in an appropriate manner;
 - c) the timing of media releases aligns with the broader context of the GHE's strategic objectives.

Academic or expert comment

19. Members of staff, external members of governance boards, students and other affiliates are free to contribute to public debate in accordance with the **Academic Freedom Policy**.
20. Members of staff, external members of governance boards, students and other affiliates may make academic and expert comment in an area of expertise and responsibility when:
 - a) participating in public debates including conferences and workshops where the media may be present;
 - b) expressing opinions about issues and ideas related to discipline/specialist areas or tertiary education issues more generally;
 - c) initiating and responding to any media issues that may arise within an area of expertise;
 - d) initiating and responding to any media issues of public interest.
21. Irrespective of the rights above and the general freedom afforded under the provisions of the **Academic Freedom Policy**, members of staff, external members of governance boards, students and other affiliates must not purport to represent or speak on behalf of GHE unless authorised to do so for general or specific purposes.
22. Members of staff, external members of governance boards, students and other affiliates must advise the Chief Executive Officer:
 - a) before commenting to the media, or
 - b) as soon as practicable when direct approaches by the media have been made and in the best professional judgement of the person approached it would be inadvisable to decline to comment pending approval to do so being obtained.
23. The right to speak is subject to the law, including the laws of defamation and discrimination, laws regulating harassment, vilification and obscene speech and the provisions of the *Information Privacy Act 2009*, the *Corporations Act 2001* and other relevant legislation.

Private/individual comment

24. Public comment by members of staff, external members of governance boards, students and other affiliates in their capacity as private individuals is permitted provided that any such comment makes it clear that the view expressed is their own and not necessarily the view of GHE.
25. When commenting in this capacity member of staff, external members of governance boards, students and other affiliates must not identify themselves in any way as representative of GHE.

Engagement with social media

26. Official GHE social media sites are developed and moderated by the Marketing Department.
27. It is the responsibility of the Chief Executive Officer (or delegate) to ensure that official GHE social media sites, in both design, content and ongoing commentary:
 - a) are reflective of GHE's Brand Guidelines;
 - b) comply with the provisions in the **Communication and Marketing Policy**;
 - c) do not bring GHE or the education sector into disrepute;
 - d) are sensitive to the cultural sensitivities of students and other internal and external stakeholders.
28. Staff must obtain approval from the Marketing Department before posting or adding official information or commenting on official information posted in relation to GHE, on official social media channels.
29. Personal, academic and professional use of social media by GHE staff, students, external members of governance boards and affiliates must not:
 - a) imply GHE endorsement of personal views;
 - b) disclose, without authorisation, confidential information;
 - c) use social media to the detriment of GHE academic and professional activities;
 - d) contravene State or Commonwealth defamation or discrimination laws.

Roles and responsibilities

30. The Board of Directors is responsible for the overall oversight of this Procedure.
31. The Chief Executive Officer is responsible for:
 - a) overseeing implementation of this Procedure;
 - b) providing an annual report of marketing approvals to the Board of Directors including evidence of incident monitoring and resulting improvements in practice.
32. The Marketing Department is responsible for:
 - a) implementation of this Procedure;
 - b) all records management arising from this Policy and Procedure.
33. The Manager, Quality and Compliance is responsible for:
 - a) ensuring compliance with this Procedure;
 - b) ensuring that staff are adequately notified of the existence of this Procedure;
 - c) benchmarking GHE policy and standards with those adopted elsewhere in the tertiary sector.
34. Members of staff, external members of governance boards, students and other affiliates are responsible for becoming familiar and complying with this Procedure.

Associated information

Related Internal Documents	<p>Communication and Marketing Policy Brand Guidelines Academic Freedom Policy Academic Progress Policy Admissions Policy Agent Appointment and Management Policy Assessment Policy Collection of Student Fees and Charges and Issuance of Refunds Policy Credit and Recognition of Prior Learning Policy Critical Incident Policy Enrolment Policy Financial Framework Governance Framework Qualifications Issuance and Graduation Policy Student Academic Integrity and Academic Misconduct Policy Student Complaints, Grievances and Appeals Policy Student Wellbeing, Orientation and Support Policy Glossary of Terms</p>
Related Legislation, Standards and Codes	<p><i>Tertiary Education Quality and Standards Agency Act 2011</i> <i>Higher Education Standards Framework (Threshold Standards) 2021</i> <i>Education Services for Overseas Students (ESOS) Act 2000</i> <i>National Code of Practice for Providers of Education and Training to Overseas Students 2018</i> <i>Anti-Discrimination Act 1991</i> <i>Corporations Act 2001</i> <i>Competition and Consumer Act 2010</i> <i>Defamation Act 2005</i> <i>Information Privacy Act 2009</i> <i>Right to Information Act 2009</i></p>
Date Approved	21 February 2020
Date of Effect	21 February 2020
Date of Review	June 2026
Approval Authority	Board of Directors
Policy Custodian	Chief Executive Officer
PinPoint DocID	2523

Change history

Version Control		Version 1.5
Change Summary	12-Dec-19	V1.0 Draft noted by 20-Dec-19 Academic Board (as part of Academic Freedom Policy suite) with amendments for consideration by the Board of Directors (BoD)
	14-Jan-20	V1.1 Revised draft approved by 21-Feb-20 BoD with minor amendments
	3-Mar-20	V1.2 revised version including minor amendments requested by BoD 21-Feb-20 (cl. 6n, 7, added 33a) plus administrative updates
	7-Jul-20	V1.3 administrative updates
	29-Nov-21	V1.4 administrative updates for HESF 2021
	7-Jul-23	V1.5 administrative updates following TEQSA registration

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