

Marketing Policy

Document Owner	Chief Executive Officer		
Responsible Officer	Group Marketing Lead RTO Manager		
Last Update	3/12/2024		
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Related Documents	<i>VET Quality Framework</i> <i>Standards for RTOs</i> <i>Use of the NRT Logo Guidelines</i> <i>Quality Assurance and Compliance Policy</i> <i>Be Trained Branding Guidelines</i> <i>Be Trained Logos</i> <i>Privacy Policy</i> <i>Consumer Protection Policy</i>		
Version	Authorised by	Approved	Effective Date
1.0	Chief Executive Officer	17/12/2024	6/01/2025

1. Context

Barrington Training Services is committed to maintaining the integrity of its operations by providing accurate and accessible information that supports students in making informed choices, upholds consumer trust, and aligns with the RTO's commitment to delivering high-quality education and training.

The Marketing Policy has been developed to ensure that BTS adheres to the *Standards for Registered Training Organisations (RTOs)*. These standards emphasise the need for transparency, accuracy, and accountability in all marketing and advertising practices to safeguard the interests of prospective and current students.

The policy aligns with broader regulatory and consumer protection frameworks to ensure students can access clear, factual, and relevant information when making decisions about their education and training.

BTS operates in a dynamic environment where its reputation and compliance with regulatory standards are integral to its success. This policy recognises the critical role of marketing in shaping public perception and ensuring compliance with:

- The *Standards for RTOs*
- Australian Consumer Law and other relevant legislation
- ASQA guidelines and monitoring requirements

This policy also acknowledges that marketing activities extend beyond the RTO's direct control when third parties or contractors are engaged. Therefore, it ensures mechanisms are in place to effectively manage, monitor, and review all marketing practices.

2. Definitions

Refer to the *Explanation of Terms* document.

Barrington Training Services Pty Ltd trading as Be Trained by Barringtons.

RTO code: 91397 **ABN:** 66 102 353 622

Address: Suite 1, 4 Columbia Court, NORWEST, NSW, 1765, Australia

Phone: 02 9899 0600 **Email:** enquiries@barringtons.com.au **Website:** www.barringtons.com.au

3. Scope

This policy applies to all BTS staff, third parties, and contractors engaged in marketing and advertising activities, including print materials, digital content, and verbal communication related to BTS's training products and services.

4. Principles

BTS is committed to the following principles in its marketing and advertising activities:

- **Integrity:** Marketing materials will reflect honesty, accuracy, and transparency in all representations of BTS's services and training products.
- **Compliance:** All marketing and advertising activities will strictly adhere to the Standards for RTOs, applicable legislation, and consumer protection laws.
- **Accountability:** BTS assumes full responsibility for all marketing and advertising, including materials created and published by third parties on its behalf.
- **Student-Centered Communication:** Marketing will prioritise the needs of prospective and current students, ensuring they have clear, factual, and relevant information to make informed decisions about their education and training.
- **Clarity:** Information will be written in plain language, free of ambiguity, and clearly distinguish between accredited and non-accredited training.
- **Fairness:** Marketing will not use misleading or deceptive practices and will avoid unrealistic promises about training outcomes or employment opportunities.

5. Policy details

5.1. Accuracy and Transparency

BTS will ensure that information about its services and performance is transparent, accurate, and readily available to current and intending students, regardless of any arrangements to have this information distributed by any third party on behalf of BTS.

All marketing and advertising material must:

- Accurately represent the services provided by the RTO and the training products on the scope of registration.
- Include the RTO's code and name as listed on the National Register.
- Clearly distinguish between nationally recognised training and other non-accredited training offered.
- Use the full title and code of any training product, as published on the National Register, to ensure clarity and consistency.
- Be consistent with the respective Training and Assessment Strategy.

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BTS does not make false claims or provide misleading information about itself, its services or its outcomes, including:

- Claims of associations between providers.
- Guarantees of acceptance into any other course or skill set.
- Guarantees that learners will successfully complete a training product or that a training product can be completed in a manner that does not meet the requirements of the Standards for RTOs.
- Guarantees that learners will obtain a specific employment outcome.
- Claim that a student will be eligible for any licence or accreditation as a result of training and/or assessment unless the issuer of that licence or accreditation has confirmed this to be the case.
- Promise the issuance of a qualification or statement of attainment unless all requirements of the training product are met.

5.2. Compliance with NRT Logo Conditions

The Nationally Recognised Training (NRT) logo must only be used in accordance with the requirements set out in the NRT Logo Conditions of Use Policy within the Standards for RTOs:

- For nationally recognised training only.
- Not on materials referring solely to non-accredited training.
- In a manner that maintains its integrity and ensures it is not misleading. Where BTS delivers training that is not nationally recognised (including school and higher education programs), the RTO will separate marketing or other information about this training from marketing and information about training that is nationally recognised.

5.3. Medium of Advertising

Barrington Training Services uses the following methods to market and advertise:

- Information Packs
- Course Outlines
- Barringtons Website
- Social Media (Facebook, LinkedIn, Instagram)
- Email Campaigns
- Newsletters, case-study, articles
- Client Base
- Sponsored content under existing corporate partnerships

The printing and publishing of marketing and advertising material can only be authorised by the CEO or delegate and must adhere to the following requirements:

Printed Materials

All printed advertising and marketing materials will include the following:

- RTO Name and Code

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- NRT Logo for Nationally recognised training – not compulsory
- References to any training products include the code and title of that product (as published by the national register)

Online Materials

All online advertising and marketing materials will include the following:

- Website
- RTO Name and Code (in a prominent position such as a header or footer)
- NRT Logo (for Nationally recognised training) – not compulsory
- References to any training products include the code and title of that product (as published by the national register)

Social Media

- RTO Name and Code (both the page and each post)
- Responses to these posts do not require the RTO code
- References to any training products include the code and title of that product (as published by the national register)

Online advertisements

- RTO Name and Code
- References to any training products include the code and title of that product (as published by the national register)

5.4. Use of RTO Branding Guidelines and Logos

The Barrington Training Services' branding, including its logo and other identifiers, must be used in accordance with the established branding guidelines to ensure consistency, professionalism, and compliance with regulatory requirements.

Key Requirements

- Adherence to the approved *Be Trained Branding Guidelines* and Logos.
- Where third parties are engaged in marketing, all materials must feature the RTO's name, code, and logo in accordance with the RTO's branding guidelines.
- Any additional third-party branding must be clearly distinguished to avoid confusion about the RTO's responsibility for the training.
- All marketing materials, including those developed by third parties, must be reviewed and approved by the Group Marketing Lead or delegate before publication to ensure adherence to branding guidelines.
- Logos or branding elements must not be altered, misrepresented, or used in a way that implies accreditation or endorsement beyond the RTO's actual scope of registration.
- Non-compliant use of branding that may mislead prospective students is strictly prohibited.

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5.5. Recruitment

BTS ensures that all student recruitment activities comply with the Standards for Registered Training Organisations (RTOs) by providing clear, accurate, and factual information to prospective students, and are carried out in accordance with the Australian Consumer Law.

Recruitment practices must enable students to make informed decisions based on their individual needs and goals.

BTS provides accurate, relevant and up-to-date information to participants before commencement. This includes, but is not limited to:

- Scope of registration
- Course information (such as code and title, content, duration, modes of delivery)
- Modes of assessment and assessment procedures
- Certification to be issued to the participant on completion, or partial completion of the course
- Competencies to be achieved during training
- Application process and selection criteria
- Arrangements for the course credits including recognition of prior learning and credit transfer
- Complaints and appeals procedure
- Facilities and resources
- Participant support services
- Fees and costs involved in undertaking training
- Fee refund policy
- Details about any VET FEE-HELP, government-funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment

Recruitment of participants is conducted ethically and responsibly. BTS ensures that participant application and selection processes are explicit and defensible and comply with access and equity principles.

Third-party recruiters acting on behalf of the RTO must comply with these requirements and are prohibited from advertising courses under their name or making unapproved claims. All recruitment materials and methods must be reviewed to ensure accuracy and alignment with the RTO's scope of registration and ethical standards.

5.6. Third-Party Marketing and Recruitment

BTS ensures that when services are provided on its behalf by a third party, the provision of those services is subject to a written agreement.

The written agreement clearly outlines the obligations of the third party to ensure consistency with our services, including:

- compliance with this policy and the Standards for RTOs.

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- Prohibition of advertising courses under their name unless they are an RTO with the course on their scope of registration.

Third parties engaged in marketing on behalf of BTS must:

- Only advertise using the RTO's name and code.
- Clearly state where they act on behalf of the RTO.
- Distinguish when training and assessment is delivered by another RTO or by a third party on the RTO's behalf.

BTS has processes in place to monitor and review a third party's services to ensure that they meet the Standards at all times. These activities may include but are not limited to:

- A regular review of the third party's performance, to be undertaken at least every three (3) months at the discretion of the BTS.
- Spot checks to be undertaken by representatives of BTS both at the third party's premises and at events.

The third party must cooperate with ASQA in the provision of information and the conduct of audits and other monitoring of activities.

BTS will disclose any arrangements with third parties where the delivery of the product is on behalf of the RTO. Where there are any changes to third-party arrangements, the RTO will advise the student as soon as practical, including about any new third-party arrangements, a change in ownership or changes to existing third-party arrangements.

5.7. Consent and Referrals

BTS must obtain explicit, informed consent before using any testimonials, images, or information that references individuals or other organisations in its marketing and advertising materials. This includes ensuring that all parties understand how their content will be used and agree to its publication.

For materials featuring students, such as photos, videos, or written content shared on social media or other platforms, BTS must secure written consent in advance. This process must include clear communication about the intended use, the platform where the content will appear, and the option for individuals to decline or withdraw consent at any time.

BTS is responsible for maintaining records of all obtained consents to demonstrate compliance during audits or in response to complaints.

5.8. Transition and Currency of Training Product

Marketing and advertising materials must only refer to current training products and within the scope of registration.

Superseded training products can only be advertised during the permitted transition period, in line with the Standards.

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5.9. Financial and Licensing Information

All marketing materials must provide transparent and detailed information regarding financial and licensing arrangements associated with the RTO's training and assessment services. This includes outlining any costs, subsidies, or loans available to students, such as VET Student Loans (VSL) or government-funded programs.

Marketing must disclose any potential debts, interest rates, or conditions tied to financial support, enabling students to fully understand their financial commitments.

Any claims about licensing or regulated outcomes resulting from the completion of a course must be substantiated and explicitly confirmed by the relevant industry regulator. BTS is responsible for ensuring that this information is accurate and compliant with regulatory requirements, thereby supporting prospective students in making informed decisions about their education and career pathways.

5.10. Advertising and Issuance of Certificates and Statements of Attainment

BTS must ensure that all advertising and promotional materials accurately represent the requirements for obtaining Certificates and Statements of Attainment. Marketing must not guarantee that a student will successfully complete a course or be issued certification without meeting the necessary training and assessment requirements. Issuance of Certificates and Statements of Attainment is contingent on the student's demonstrated competency in alignment with the Standards for RTOs.

Marketing materials must also clarify that the issuance of AQF certification documentation is strictly tied to the completion of nationally recognised training products on the RTO's scope of registration. BTS will avoid any claims that could mislead students regarding the timeframes for completion, automatic issuance of qualifications, or eligibility for specific licenses or employment outcomes.

5.11. Review and Approval Process

Marketing and advertising material must be audited before implementation using the **Marketing Audit Checklist**.

Marketing and advertising material must be approved by the CEO or delegate.

Marketing and advertising material documents must be logged in the **Marketing Register** with version control and the next review due date, including a summary of changes where applicable.

6. Breaches

If a staff member or third party is found to be in breach of this Policy, she or he may be subject to disciplinary action in accordance with the relevant Code of Conduct and Misconduct Procedure.

7. Appeals

Appeals concerning any decision taken in relation to this Policy should be made under the relevant Complaints and Appeals Policy, which can be accessed from the BTS website.

Document History:

Version	Date	Author	Reason	Sections
0.1	9/12/2024	Ivan Negro	Document Creation	All
1.0	17/12/2024	Allen Barry	CEO Approval	All

This document is UNCONTROLLED once printed.

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