



VET Student Loan Marketing Policy

Overview

The Redcliffe Aero Club (RTO No. 40971) acknowledges that we must comply with the VET Student Loans Act 2016 and the VET Student Loans Rules 2016, with regards to all marketing requirements.

We acknowledge that we must comply with the below, which are outlined in the VET Student Loans/Manual for Providers/ Version 5.3 – February 2023 – below is a direct extract.

4.10 Marketing

The Act and the Rules contain several provisions relating to marketing. It is your responsibility to implement business practices in line with the legislative requirements and to assess the risk of those practices not meeting the legislative requirements.

You should note the marketing provisions (section 60 – 64 of the Act) are civil penalty provisions. Breaching section 60 (misrepresenting VSL) may give rise to a maximum civil penalty of up to 240 penalty units. Breaching section 61 (offering certain inducements) may give rise to a maximum civil penalty of up to 120 penalty units. Breaching any of sections 62 (engaging in cold calling), 63 (use of third-party contact lists) or 64 (other marketing requirements) may give rise to a maximum civil penalty of up to 60 penalty units.

4.10.2 Misrepresenting VET Student Loans

You must not represent that a VSL is not a loan or does not have to be repaid [Act s 60]

4.10.2 Offering inducements

You must not offer or provide a benefit or cause a benefit to be offered or provided which would be reasonably likely to induce a person to apply for a VSL for a course [Act s 61].

This does not apply in relation to the following benefits [Rules s 136]:

- *the content and quality of the course*
- *the amount of the tuition fees for the course*
- *the availability of a VSL for the course*
- *marketing merchandise of up to a total value of \$30 per person.*

Inappropriate inducements

Inappropriate inducements include items which could be used by the student outside of the period of the VET unit or course of study, or are unrelated to the course such as travel, entertainment, hospitality or accommodation services, vouchers redeemable for goods or services and money.

You may have regard to the following when determining whether a benefit represents an inappropriate inducement – depending on the circumstances, these factors would be less likely to suggest the benefit is an inappropriate benefit:

- *there is no immediate benefit to the person, as the person would still be required to complete the course to obtain the benefit*
- *the benefits in itself would not be a replacement for the course of study*
- *the monetary value of the benefit is unlikely to induce a student to enrol in a course.*

Disclaimer:

*This information is provided as a basic guide to assist you determine whether you require independent legal advice to ensure compliance. It should **not** be relied upon as legal advice or as an excuse for inappropriate behaviour.*

4.10.3 Engaging in cold calling

You must not when cold calling another person to market, advertise or promote a course, mention the possible availability of a VSL for students undertaking the course [Act s 62(1)].



Cold calling includes making unsolicited contact with a student (or prospective student) in person, or by telephone, email or other form of electronic communication [Act s 62(2)].

You must not use contact details received from another person to contact a student (or prospective student) to market, advertise or promote a course or enrol the student in a course, and in so doing mention the possible availability of a VSL [Act s 63].

This does not apply where the student (or prospective student) has given express consent to be contacted by you [Rules s 138(1)]. A student is taken to have provided express consent if all the following are met [Rules s 138(2)]:

- *information in the request was presented clearly, and set out the specific purpose for which the student's personal information would be used if consent were given*
- *the request was prominent*
- *the student was able to give consent in a separate optional tick box from other consents*
- *the request was not a required field to be answered for a person to submit other information*
- *the request did not include a default tick for consent*
- *the request named the provider*
- *the request detailed any referral fee or other fee that would be paid to the person who made the request and any other benefit that would be provided to the person who made the request.*

A student is also taken to have provided express consent if the student initiates contact with a third party for the purposes of giving information to you, or getting information from you, relating to education and training [Rules s 138(3)]. The purpose of this provision is to allow students who are deliberately seeking information on courses from a particular provider to agree to being contacted.

4.10.5 Other marketing requirements

You must ensure that any marketing of an approved course you offer or provide prominently mentions [Rules s 140]:

- *your name, registered business name (if any), and any other business name you use*
- *the code as a registered training organisation on the National Register and*
- *the maximum tuition fees for the course.*

4.10.6 Information about fees

*You must not be marketed unless the tuition fees for the course (including tuition fees for units/parts of courses) have been published on your website in way that is readily accessible by the public. In addition, maximum course fees must be published on the **MySkills** website. [Rules s 141].*

4.10.7 Marketing that mentions VET Student Loans

You must ensure any marketing in which you mention the possible availability of a VSL (however described) for students undertaking a course [Rules s 142]:

- *prominently mentions:*
 - *your name and any registered business name or other business name you use*
 - *your RTO registration code*
 - *that VSL will not be approved for students who do not meet eligibility requirements and*
 - *that a VSL gives rise to a VETSL debt which continues to be a debt due to the Commonwealth until it is repaid*
- *presents the information above in a font size approximately the same as any other marketing information that accompanies it*
- *if the marketing is online, presents the information covered above on the same webpage as the other marketing of the course and*
- *if the marketing uses the VSL logo, presents the logo in accordance with the style guide for the use of the logo published on our website*



4.10.8 Social Media

You must ensure any marketing you or your courses through social media does not mention the possible availability of a VSL for students undertaking a course **[Rules s 143]**.

Social media includes, for example, Facebook, Instagram and Twitter. This list is not intended to be exhaustive. The Explanatory Statement to the VET Student Loans Rules 2016 provides as follows:

Section 143 prohibits an approved course provider from marketing the provider or its approved courses through social media in a way that mentions the possible availability of a VET student loan (however described). The section is intended to enhance the protection of students by prohibiting aggressive marketing practices. Social media includes, for example, Facebook, Instagram and Twitter.

YouTube is considered to be a social media platform and should not mention the possible availability of a VSL.

4.10.9 Branding

You must ensure the approved VSL logo is used in its complete and original form as provided by us. It cannot be rearranged or split into individual elements.

You may use or co-brand the VSL logo with your own organisation's logo and visual identity. The approved placement for the VSL logo is to the right of your own logo.

The VSL logo may be published on your website on the page outlining information about VSL. It may not be used on any other materials or printed publications such as office stationery, business cards, letterheads, signs and pamphlets. The VSL logo may not be used by third parties.

The VET Student Loans Style Guide is available on **Information for Vet Student Loans Approved Providers**.

Note: You are only to use the VSL logo on your own website on the page which provides information about VSL, not on your homepage, or in multiple locations throughout the website. You must also provide a link back to **VET Student Loans**. The logo is not to be used on any other materials or printed publications such as office stationery, business cards, letterheads, signs and pamphlets. This information is in accordance with the published **VET Student Loans Style Guide**.

4.10.10 Use of Brokers or Agents

As part of ensuring only quality providers are responsible for providing approved courses and enrolling students, there are strict limits on your use of brokers or agents.

You must not enter into an arrangement with another person for that person to do any of the following in relation to an approved course **[Act s 49]**:

- enrol students, or accept an application to enrol students, in the course
- provide information or advice in relation to VSL for the course
- assist students to complete or submit applications for a VSL for the course
- assist, or provide support for, students who could be eligible for a VSL for the course to complete any assessments required to show that students are academically suited to undertake the course.

This prohibition against arrangements with brokers or agents applies whether the arrangement is in writing or not.

This prohibition does not apply in relation to an arrangement that is a contract of employment **[Act s 49]** or with a member of the Australasian Conference of Tertiary Admission Centres **[Rules s 96]**.

This is a civil penalty provision, giving rise to a civil penalty of up to 60 penalty units.



Specifications

With respect to marketing requirements, VET Student Loans/ Manuals for Providers/ Version 5.3 – February 2023 Section 4.10. – pages 90-93. The Redcliffe Aero Club does not have any third-party agreements in place at this time and has no intention of implementing any in the near future although we are aware of the requirements should they wish to do so.

Policy

All marketing material prepared for the below courses and/or the mention of any Diploma courses or VET Student Loan funding must meet all relevant requirements.

- AVI50222 Diploma of Aviation (Commercial Pilot Licence – Aeroplane)
- AVI50519 Diploma of Aviation (Instrument Rating)
- Aviation Double Diploma AVI50222 Diploma of Aviation (Commercial Pilot Licence – Aeroplane) / AVI50519 Diploma of Aviation (Instrument Rating)

Marketing material is identified as:

- Twitter
- Instagram
- Linked in
- Facebook
- Websites
- Publications (Airchat)

All marketing or media material must comply with all relevant standards, the CEO or President of the club must produce marketing material for approval to RTO Co-Ordinator or in his/her absence a qualified external Auditor for approval before said material is published. There is no exception this rule.

Review

This policy shall be reviewed annually or as required in conjunction with any changes to the RTO Standards 2015.