

# Marketing Policy

**Higher Education and  
Vocational Education**



## Scope

This policy is applicable to Kaplan Education Pty Ltd and Kaplan Higher Education Pty Ltd trading as Kaplan Professional (referred to as “Kaplan”). The policy applies to all Kaplan staff involved in the provision of marketing design and practice of Kaplan’s services, including to students and clients.

## Purpose

This Policy establishes the requirements governing the marketing and advertising of higher education and vocational education courses and services. The Policy sets out requirements to achieve compliance with:

- Higher Education Standards Framework (Threshold Standards) 2021 (HESF);
- Tertiary Education Quality and Standards Agency Act 2011;
- ASQA 2025 Standards for RTOs;
- Australian Consumer Law (Competition and Consumer Act 2010); and
- Other applicable regulatory obligations.

This Policy requires that all representations made by Kaplan are accurate, ethical, current, and not misleading, and that prospective students are provided with sufficient information to make informed decisions.

## Definitions

|                               |                                                                                                                                                                                                                                                          |
|-------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>ACL</b>                    | Australian Consumer Law (as amended from time to time)                                                                                                                                                                                                   |
| <b>Advertising</b>            | The activity of producing advertisements for commercial products or services                                                                                                                                                                             |
| <b>AQF</b>                    | The Australian Qualifications Framework                                                                                                                                                                                                                  |
| <b>AQF Qualification</b>      | An AQF qualification type endorsed in a higher education or vocational education accredited course.                                                                                                                                                      |
| <b>ASQA</b>                   | Australian Skills Quality Authority                                                                                                                                                                                                                      |
| <b>Course</b>                 | An approved program of study that leads to an accredited award. It is a planned and structured sequence of learning and teaching that allows individuals to gain knowledge, skills and understanding.                                                    |
| <b>Consent</b>                | Written approval from any person or organisation quoted in the Marketing or Advertising as endorsing a Kaplan Professional training product.                                                                                                             |
| <b>Marketing</b>              | The promotion of courses to prospective students, clients, parents and guardians, and other interested stakeholders.                                                                                                                                     |
| <b>National Register</b>      | Public register of all training packages on training.gov.au which are approved for an industry sector for RTOs to use to develop Training Products. The public register includes the requirements of qualifications, skill sets and units of competency. |
| <b>Non-accredited courses</b> | Contains no units of competency and is not a recognised vocational education qualification or course. A non-accredited course may be required for licensing in an industry sector.                                                                       |
| <b>NRT logo</b>               | A registered trademark that signifies quality and national recognition within Australia’s vocational education and training (VET) sector. It is used to promote and certify training that leads to AQF qualifications or Statements of Attainment.       |



|                                |                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|--------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>TEQSA</b>                   | Tertiary Education Quality and Standards Agency. An independent statutory authority with the responsibility to regulate and assure the quality of Australia's higher education sector by registering and assessing the performance of higher education providers against the Higher Education Standards Framework (HESF).                                                                                                                     |
| <b>Third Party Arrangement</b> | <p>Any person who has an arrangement with an NVR registered training organisation to deliver services, but does not include:</p> <ul style="list-style-type: none"><li>• employees of the organisation</li><li>• experts engaged by the organisation or</li><li>• government agencies and government funded agencies that refer VET students to the organisation and do not receive any payment from the organisation for doing so.</li></ul> |
| <b>Training Product</b>        | An AQF qualification, skill set, unit of competency, accredited short course or module.                                                                                                                                                                                                                                                                                                                                                       |
| <b>Transition</b>              | When a training product is revised, there is a 12-month Transition period (formerly known as teach out) for students in the previous version to complete their studies or transition to the new version.                                                                                                                                                                                                                                      |
| <b>VET Accredited Course</b>   | A course accredited by the Vocational Education Training (VET) regulator in accordance with the Standards for VET Accredited Courses. At the time of writing, Kaplan does not offer any VET accredited courses.                                                                                                                                                                                                                               |

## Principles

Kaplan is committed to ensuring that all higher education and vocational education marketing is accurate, ethical, and compliant with legal and regulatory requirements. All marketing must:

- be current, and not false, misleading or deceptive
- clearly distinguish between accredited higher education awards, vocational education and training (VET) qualifications, and non-award or continuing education offerings
- reflect Kaplan's current approved scope of registration and accreditation
- enable informed decision-making by prospective students
- be supported by verifiable evidence for all claims, including outcomes, rankings, or employment pathways
- maintain and protect Kaplan's reputation and regulatory standing.

These principles apply to all representations of courses, qualifications, skill sets, and units of competency.

## Prohibited Conduct

Kaplan prohibits staff from engaging in any marketing or promotional conduct that is unlawful, misleading, deceptive, inaccurate, unsubstantiated, or outside its approved scope of registration.

Kaplan will not:

- advertise or promote courses that are not approved or not within its TEQSA or ASQA scope of registration.
- guarantee successful course completion, academic outcomes, employment outcomes, salary levels, or professional registration.
- guarantee completion in a way that does not meet the requirements of the accredited qualification or training package requirements.
- use ambiguous, exaggerated, comparative, or superlative claims unless these are supported by verifiable and documented evidence.
- present testimonials, endorsements, or third-party statements without documented written consent and retained evidence.



- imply automatic eligibility for professional registration, membership, or licensing unless this is accurate and independently verifiable.
- refer to employment, salary, or career outcome data without clearly identifying the source and retaining supporting evidence.
- send spam messages contrary to law.

## Marketing Materials

All marketing materials are developed by the Marketing team in consultation with Academic Content and Development and Compliance and Governance staff to maintain accuracy, consistency, and compliance.

Marketing materials include but are not limited to:

- Course or program brochures
- Flyers, banners, and promotional collateral
- Newsletters and email communications
- Broadcast media (radio and television)
- Website content and landing pages
- Paid search and online advertising
- Social media content, including sponsored posts
- Automated or AI-generated marketing content

This Policy applies to all marketing materials regardless of format, channel, or method of dissemination.

## Content Standards

Marketing materials are required to:

- be prepared with due care and reflect Kaplan's primary function as an education provider.
- accurately represent the nature, content, and outcomes of courses and qualifications.
- clearly articulate Kaplan's academic expertise and areas of specialisation.
- be consistent with Kaplan's approved scope of registration and accreditation.
- comply with this Policy and all applicable regulatory requirements.

Digital, automated and AI-generated content is subject to the same approval, verification, and review requirements as non-digital materials.

The Kaplan website is the primary source of current and authoritative information. All marketing materials must align with published website content.

Kaplan will ensure marketing materials are reviewed and approved in accordance with the Marketing Approval Workflow (Annexure A) prior to publication. Marketing materials must also be subject to periodic review to maintain ongoing accuracy, currency, and compliance.

## Regulatory Disclosures

All marketing materials must include, or provide clear access to, information relating to:

- entry requirements and assumed knowledge
- course structure, duration, delivery, and assessment
- fees, charges, and applicable policies
- available academic, learning, and wellbeing support
- any licensing, regulatory, or occupational outcomes (where applicable).

Information must be available to prospective students prior to enrolment and prior to the payment of any fees.



Specific regulatory disclosure requirements for Higher Education (HE) and Vocational Education (VE) marketing are set out in the table below. 'General Marketing' refers to organisational-level marketing, 'Course-Specific Marketing' refers to any material promoting a specific course, qualification, or training product.

| Requirement                                                     | HE                |                           | VET               |                           |
|-----------------------------------------------------------------|-------------------|---------------------------|-------------------|---------------------------|
|                                                                 | General Marketing | Course-Specific Marketing | General Marketing | Course-Specific Marketing |
| Kaplan legal entity name and trading name                       | ✓                 | ✓                         | ✓                 | ✓                         |
| ABN                                                             | ✓                 | ✓                         | ✓                 | ✓                         |
| HEP code                                                        | ✓                 | ✓                         | ✗                 | ✗                         |
| RTO code                                                        | ✗                 | ✗                         | ✓                 | ✓                         |
| Distinction between AQF-accredited and non-accredited offerings | ✓                 | ✓                         | ✓                 | ✓                         |
| Disclosure of fee-for-service model and/or funding arrangements | ✓                 | ✓                         | ✓                 | ✓                         |
| Learning and support services                                   | ✓                 | ✓                         | ✓                 | ✓                         |
| Wellbeing support services                                      | ✓                 | ✓                         | ✓                 | ✓                         |
| Refund, transfer, and withdrawal information                    | ✓                 | ✓                         | ✓                 | ✓                         |
| Reference and/or link to policies                               | ✓                 | ✓                         | ✓                 | ✓                         |
| Disclosure of changes to training products/services             | ✓                 | ✓                         | ✓                 | ✓                         |
| Course title/ code and AQF level                                | ✗                 | ✓                         | ✗                 | ✓                         |
| Accreditation status                                            | ✗                 | ✓                         | ✗                 | ✓                         |
| NRT logo (where applicable)                                     | ✗                 | ✗                         | ✓                 | ✓                         |
| Link to National Register (training.gov.au) (where applicable)  | ✗                 | ✗                         | ✗                 | ✓                         |
| Duration of course                                              | ✗                 | ✓                         | ✗                 | ✓                         |
| Modes of delivery                                               | ✗                 | ✓                         | ✗                 | ✓                         |
| Cohort information                                              | ✗                 | ✓                         | ✗                 | ✓                         |
| Entry requirements and assumed knowledge                        | ✗                 | ✓                         | ✗                 | ✓                         |
| Pre-enrolment processes and suitability information             | ✗                 | ✓                         | ✗                 | ✓                         |
| Assessment requirements                                         | ✗                 | ✓                         | ✗                 | ✓                         |
| Materials, equipment, and IT requirements                       | ✗                 | ✓                         | ✗                 | ✓                         |
| Tuition fees, costs, and charges                                | ✗                 | ✓                         | ✗                 | ✓                         |
| Recognition of prior learning / credit transfer information     | ✗                 | ✓                         | ✗                 | ✓                         |
| Licensing or occupational outcomes (if applicable)              | ✗                 | ✓                         | ✗                 | ✓                         |
| Statement regarding absence of work placements (if applicable)  | ✗                 | ✓                         | ✗                 | ✓                         |
| Census date                                                     | ✗                 | ✓                         | ✗                 | ✓                         |
| FEE-HELP eligibility and loan information                       | ✗                 | ✓                         | ✗                 | ✓                         |
| Unique Student Identifier (USI) requirements                    | ✗                 | ✗                         | ✗                 | ✓                         |
| Disclosure of any third-party arrangements                      | ✗                 | ✗                         | ✓                 | ✓                         |

✓ = Required ✗ = Not applicable

## Changes to Courses and Services

Where changes occur to courses, training products, or services, Kaplan will inform students as soon as practicable. This includes transitions of superseded, deleted, or expired training products.

Communication may include:

- email
- website updates
- learning management system notifications
- internal communication to relevant staff.



## Funding Disclosure

Kaplan operates primarily as a fee-for-service provider.

Kaplan Professional does not currently receive Commonwealth, State, or Territory funding for Vocational Education and Training (VET) courses or qualifications.

For Higher Education (HE), eligible students may access Commonwealth assistance through the FEE-HELP loan scheme. Where applicable, marketing materials must clearly disclose FEE-HELP availability, eligibility requirements, and any associated student obligations.

Where any government funding or subsidised arrangements apply (now or in the future), the source of funding, eligibility criteria, and any conditions must be clearly and accurately disclosed in all relevant marketing and advertising materials, including the Kaplan website.

## NRT Logo

The Nationally Recognised Training (NRT) logo must be used strictly in accordance with the VET Quality Framework and applicable legislation.

The NRT logo may only be used:

- For training products within Kaplan's approved scope of registration
- In relation to AQF qualifications or Statements of Attainment

The NRT logo must not be used:

- For non-accredited training or training that does not lead to an AQF outcome
- In any way that misrepresents the status of a course or qualification

## Consent for Endorsements

The Kaplan Marketing team must obtain and document written consent from any person, including any current, former or prospective student, or any organisation referred to, quoted or mentioned in any Kaplan Marketing and Advertising material. This must be documented on an "*Authority to Use Information Form*".

## Approval and Review Process

### Pre-Publication Approval

- All Kaplan marketing material must be approved in accordance with the Marketing Approval Workflow outlined in Annexure A.
- All Kaplan marketing material will be developed by the Marketing team in collaboration with the General Manager, Academic Content and the Senior Manager, Compliance and Governance. This includes information provided via:
  - Kaplan's website
  - Kaplan's subject/course outline documents and course brochures
  - an approved third party (including the third party's websites and other marketing collateral referring to Kaplan or any of its courses or qualifications)
- The Marketing team will verify that:
  - all marketing material promoting Kaplan courses and qualifications contain relevant mandatory content.
  - any marketing leading to an AQF qualification are easily distinguishable to any other training and assessment services offered by Kaplan.
  - all materials accurately reflect approved TEQSA and ASQA course or qualification on its Scope of registration and any revisions are communicated to staff.
  - staff involved in the provision of marketing material maintain up-to-date knowledge of TEQSA and ASQA standards related to marketing and representation.
- All marketing and advertising materials, including website content, must be approved by the General Manager of Marketing or their delegate. Technical changes follow the process in Appendix A which includes the General Manager, Marketing.



- For final approval, the CEO- Kaplan Professional, or their approved delegate, will authorise the publication of materials.

### Ongoing Review

Marketing materials must be reviewed regularly to maintain accuracy and currency in accordance with Marketing Approval Workflow outlined in Annexure A to this Policy.

## Ethical Sales Approach

Kaplan's sales processes focus on providing transparent and accurate information to clients and students to make informed choices about a suitable Training Product for their learning needs. Kaplan Professional prohibits high-pressure sales tactics, misleading or deceptive practices; as required by Australian Consumer Law (ACL). Kaplan does not engage in unsolicited outbound sales campaigns.

## Third-Party Representatives

Kaplan remains accountable for all marketing conducted on its behalf, including by third parties. Staff must procure that if a marketing supplier engages any third party to undertake marketing or promotional activities on behalf of Kaplan, that supplier engages the third party pursuant to a written agreement containing obligations that are no less stringent than, and substantively mirror, the obligations imposed on the supplier under its agreement with Kaplan, including obligations relating to legal and regulatory compliance, ethical conduct, accuracy of representations and protection of Kaplan's reputation and brand.

Where advertisements or marketing materials refer to services that Kaplan Professional has engaged a Third Party to deliver, Kaplan Professional must clearly identify which services will be delivered by the Third Party, including where a Third Party is:

- recruiting prospective students on behalf of the organisation; or
- delivering training and assessment on behalf of the organisation.

Third-party marketing activities will be reviewed at least annually by the Marketing team. Confirmed or suspected misrepresentation must be reported within two (2) business days to the General Manager, Marketing.

## Records Management

Kaplan will maintain a central Marketing Register containing:

- current marketing materials
- historical versions
- approval records
- evidence supporting claims made.

Marketing records must be retained in accordance with Kaplan's Retention Framework. At a minimum:

- marketing materials, approvals, and supporting evidence must be retained for eight (8) years from the date the material is superseded or withdrawn;
- marketing campaign engagement and interaction data must be retained for no longer than twelve (12) months after last meaningful engagement, unless a longer retention period is required by law.

All records must remain accessible in Kaplan's designated recordkeeping system for audit purposes

## Complaints and Appeals

Any grievance, complaint or appeal in relation to the implementation of this policy will be managed in accordance with the Grievances, Complaints and Appeals Handling Policy located on the Kaplan website.

## Relevant Legislation

This Policy supports compliance with:

- Higher Education Standards Framework (Threshold Standards) 2021
- Tertiary Education Quality and Standards Agency Act 2011
- National Vocational Education and Training Regulator Act 2011 (Cth)
- Outcome Standards for RTOs 2025
- VET Quality Framework
- Australian Consumer Law (Competition and Consumer Act 2010)
- Spam Act 2003 (Cth)
- Australian Qualifications Framework (AQF)
- NSW Fair Trading Act 1987

## Related Policies and Documents

Other policies associated with this policy are found on the Kaplan Professional website.

### Higher Education

- Admissions Policy
- Privacy Policy

### Vocational Education

- Enrolment Policy
- Privacy Policy
- Training and Assessment Strategy Policy

## Version Control and Accountable Officers

It is the joint responsibility of the Implementation Officer and Responsible Officers to maintain compliance with this policy.

| <b>Policy Category</b>        | Academic                                                                                               |                                                                                                                                                                                                                                                                                                                             |                       |                        |
|-------------------------------|--------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|------------------------|
| <b>Responsible Officer</b>    | Vice President, Academic                                                                               |                                                                                                                                                                                                                                                                                                                             |                       |                        |
| <b>Implementation Officer</b> | General Manager, Marketing, General Manager, Academic Content, Senior Manager, Compliance & Governance |                                                                                                                                                                                                                                                                                                                             |                       |                        |
| <b>Review Date</b>            | June 2029                                                                                              |                                                                                                                                                                                                                                                                                                                             |                       |                        |
| <b>Approved by:</b>           |                                                                                                        |                                                                                                                                                                                                                                                                                                                             |                       |                        |
| KHE Academic Board            |                                                                                                        |                                                                                                                                                                                                                                                                                                                             |                       |                        |
| <b>Version</b>                | <b>Authored by</b>                                                                                     | <b>Brief Description of the Changes</b>                                                                                                                                                                                                                                                                                     | <b>Date Approved:</b> | <b>Effective Date:</b> |
| 1.0                           | Quality, Regulation & Standards team                                                                   | New policy <ul style="list-style-type: none"><li>• Alignment of HE and VET policies</li><li>• Addition of regulatory disclosure requirements table</li><li>• Alignment of records management with data retention framework</li><li>• Inclusion of Spam Act 2003</li><li>• Addition of Marketing Approval Workflow</li></ul> | 11.06.2026            | 02.07.2026             |

## Annexure A–Marketing Approval Workflow

This workflow applies to all marketing materials prior to publication or distribution. All stages must be tracked in Asana, which serves as Kaplan’s official marketing approval record system.

### Stage 1 – Initiation and Task Creation

Marketing, Academic Content and Compliance

New task created, including, where relevant:

- Course name and code
- Medium (website, brochure, digital, third-party, etc.)
- Draft content
- Proposed publication date

The Marketing team confirms that:

- The course is approved and within TEQSA/ ASQA scope of registration
- Legal entity name, ABN and HEP/ RTO Code are included
- Uses testimonials only where documented consent is retained

### Stage 2 – Academic Verification

Academic Content

Academic verification confirms:

- Course title and award are correct
- AQF level is accurate
- Entry requirements are accurate
- Accreditation or professional body recognition statements are correct
- Learning outcomes and descriptions align with approved course documentation
- Accurate references to registration, licensing or professional outcomes

### Stage 3 – Compliance Review

Compliance & Governance

Compliance review confirms that the material:

- Is not misleading, deceptive or ambiguous
- Does not guarantee completion or employment outcomes
- Does not contain unsubstantiated comparative or superlative claims
- Includes all relevant mandatory requirements
- Identifies the source of any employment, salary or performance claims
- Complies with TEQSA/ ASQA standards and ACL.

### Stage 4 –Third-Party Controls

Marketing

Where applicable, the following must also be recorded:

Third-Party Marketing

- Confirmation that third party agreement with supplier exists.
- Copy of approved material provided
- Record of distribution or publication link

### Stage 5 – Final Approval

General Manager, Marketing/ CEO

The General Manager, Marketing must:

- Confirm academic and compliance approvals are recorded
- Review and approve the final copy
- Escalate any regulatory risk matters to CEO

KP CEO approval is required where:

- A new higher education qualification is launched
- A high-risk or high-profile campaign is undertaken
- Regulatory risks have been escalated

### Stage 6 – Publication

Marketing

Once final approval is recorded:

- Marketing materials may be published or distributed
- Publication is confirmed and the task is completed

### Stage 7 – Ongoing Monitoring and Review

Marketing, Academic Content and Compliance

Materials are reviewed periodically for accuracy and currency;

- A new task is created for updates or changes.

Annual review tasks scheduled for:

- Ongoing campaigns
- Website standing pages
- Third-party marketing arrangements