

Marketing and Recruitment Policy

Sydney Institute of Business and Technology Pty Ltd
trading as Sydney Institute of Business and Technology (SIBT)
A member of Navitas Pty Limited
CRICOS Provider Code: 01576G
TEQSA Provider Code: PRV12046

Document

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| Document Name | Marketing and Recruitment Policy |
| Brief Description | This policy outlines how Sydney Institute of Business and Technology (SIBT) seeks to ensure that its staff, partners and potential students have a clear and accurate understanding of the College, its education programs and related services. |
| Responsible Officer | Director of Marketing and Admissions |
| Delegated Authority | Senior Management Team |
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Version Control

| Date Approved | Version No. | Summary of Changes | Approver |
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| 11/12/2025 | 1 | Initial Release | Senior Management Team |

Related Documents

| Name | Location |
|-----------------------------------------------------------------|-------------------------------------------------------------------------------|
| Navitas Educational Advisor Management Policies and Procedures | SIBT Website |
| Privacy Policy | SIBT Website |
| Transfer of Provider Policy | SIBT Website |
| Website Content Review Policy | SIBT Website |
| Brand Guidelines | Internal Document |
| Higher Education Support Act 2003 | https://www.legislation.gov.au/ |
| Higher Education Standards Framework (Threshold Standards) 2021 | https://www.legislation.gov.au/ |
| Higher Education Provider Guidelines | https://www.legislation.gov.au/ |
| Education Services for Overseas Students Act 2000 | https://www.legislation.gov.au/ |

| Name | Location |
|---------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------|
| National Code of Practice for Providers of Education and Training to Overseas Students 2018 | https://www.legislation.gov.au/ |

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1 Purpose

- a) The purpose of this policy is to ensure that the SIBT brand, image, and reputation are promoted in a cohesive, consistent, and positive manner to stakeholders. This includes having a clear and accurate understanding of SIBT, its educational programs and related services, through its marketing information and practices.
- b) The Marketing team will manage all aspects of SIBT's corporate identity, brand management and marketing activities including advertising, student recruitment through various Educational Agents, student recruitment events, promotional publications, online and social media marketing, branding and design of corporate materials and templates (as outlined in the Brand Guidelines).

2 Definitions

| Term | Meaning |
|-----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Advertising | A tactical execution of marketing and brand messages for the purpose of promoting SIBT, its programs and courses, and other services using traditional and non-traditional mediums. |
| Brand Image | How SIBT is perceived by stakeholders and the general public. |
| Corporate Identity | Logo, logo positioning, logo variations, slogan, corporate colours, typography and other elements of visual identity. |
| Collateral | Media, brochures, posters, signs, visual aids, information sheets, other printed information and web content to support marketing plans and strategies. |
| Marketing Activities | Activities designed to promote the brand image of SIBT using various media, including print, electronic, radio, outdoor, and display advertising. |
| Stakeholders | Prospective students and their influencers, current students, alumni, staff, Executive, the Academic Board, University Partner, government, suppliers, business and industry partners, other customers, and the general public. |
| Recruitment | The act of identifying potential students, informing them of the opportunities available at SIBT, evaluating their fit with SIBT's offerings, and providing a range of materials and activities to assist them in making an informed decision on whether SIBT is the most suitable educational destination for them. |
| Campaign | A coordinated series of linked advertisements or an organised course of action to promote SIBT with either a single idea or theme or a nominated time period. |

3 Application

This policy applies to:

- a) All materials used, created, or distributed by SIBT, including digital and physical formats.
- b) All activities that involve the use of copyrighted content, including teaching, research, publishing, and communication.

4 Policy Statement

- a) Producing high quality, effective and consistent marketing and promotional materials that are not false or misleading, and consistent with Australian Consumer Law;
- b) Ensuring that all marketing and promotional material complies with the ESOS Act 2000, The National Code 2018, the Higher Education Standards Framework (2021), TEQSA Act 2011 and other consumer legislation and thus providing sufficient information for students to make an informed choice of course, provider and place of study;
- c) Ensuring that marketing and promotional materials are coordinated and consistent with SIBT's marketing and brand objectives, and
- d) Maintaining the integrity and reputation of SIBT, Western Sydney University and Navitas Pty.

5 Marketing Strategy and Planning

- a) SIBT's Strategic Plan outlines the marketing objectives and tactics for the next five years. These are reviewed and adjusted annually in line with reassessing the strategic plan each year. This is endorsed by the SIBT Board of Directors. Progress reports against strategies and targets are monitored and shared with the Senior Management Team for each trimester.

6 Marketing Material

- b) All marketing material must:
 - i. clearly identify SIBT as the College;
 - ii. include SIBT's CRICOS number and the programs (if applicable) being promoted;
 - iii. provide information which is accurate and unambiguous;
 - iv. be approved by the relevant authority identified in the SIBT Delegated Authorities Policy;
 - v. be consistent with the College's Brand Guidelines;
 - vi. comply with the National Code of Practice for Providers of Education and Training to Overseas Students (with particular reference to Standards 1, 2 and 4) (National Code, 2018);
 - vii. comply with the Education Services for Overseas Students (ESOS) Act (sections 8, 9 and 107).
 - viii. make every reasonable attempt to inform individuals who participate in photo shoots or videos, including graduations and other functions, that the material may be used for marketing purposes.

7 Advertising in Newspapers/Magazines/Electronic Media

- a) Advertisements to be placed in newspapers, magazines or electronic media (including social media), and promotional material to be provided to Education Agents, are to be signed off by the Director Marketing and Admissions.
- b) SIBT logos, CRICOS and Provider logos may be required.
- c) Information appearing in advertisements must be accurate and current.
- d) Legal entity and company names and CRICOS provider code/number must also be presented on advertisements and marketing materials.

- e) Budgets and marketing plans are required to support advertising projects.
- f) Photo permission evidence needs to be accepted and recorded.
- g) Advertisements are retained, along with any editorial documentation, for future reference and review including above and below the line advertising, with particular focus on digital and programmatic advertising including search engines, social media and display advertising.

8 Website Management

- a) SIBT recognises the importance of the continuous revision of its website content and layout to ensure staff, current and potential students, partners and the general public are presented with up-to-date and accurate information.
- b) The website must comply with the Brand Guidelines.
- c) The Director of Marketing and Admissions holds overarching authority and accountability for SIBT's external facing website, registration of domain names and social media where a recipient might reasonably believe the information is written on behalf of SIBT. (Refer [Website Content Review Policy](#))

9 Setting Tuition Fees (Annually)

- a) In line with the Higher Education Provider Guidelines 2012 (5.35.1):
 - i. Tuition fees for each unit of study for each cohort must be published and made publicly available by 1 October in the year immediately preceding the year in which the student cohort commences its course of study.
 - ii. The College Director and Principal will manage the fee review and publication of increases in consultation with the Commercial Finance Manager and UPA EGM.

10 Promotional Items

- a) The Director of Marketing and Admissions approves all proposals to produce SIBT-branded items for gifts in line with established Marketing Plans, to ensure that high standards of quality and suitability are maintained.

11 Training of SIBT Marketing Staff

- a) SIBT actively supports and promotes staff training to aid in compliance with the marketing policy and its underpinning legislation. Marketing staff are provided an induction on the National Code 2018 Standards and ESOS Framework upon commencement and are advised:
 - i. They cannot actively recruit students studying at other institutions before they have completed six months of study of the principal program in the package;
 - ii. That any applicant enrolled with another provider must produce a Letter of Release, and in the case of students younger than 18 years of age, written permission from a parent or legal guardian;
 - iii. Will make every reasonable attempt to inform individuals who participate in photo shoots or videos, including graduations and other functions, that the material may be used for marketing purposes;

- iv. Student recruitment must be undertaken in a professional manner to maintain the integrity and reputation of SIBT. No students will knowingly be recruited where the recruitment would conflict with the National Code 2018 and relevant SIBT policies and procedures, including SIBT's Admissions Policy and Procedures.

12 Managing Educational Agents

- a) SIBT (through the Parent; Navitas Group) engages education agents around the world to assist in its international marketing activities. Details of all agents are established in the Navitas Group, Customer Relationship Management (CRM) and maintained in PRISMS. Education Agents will be listed on the SIBT website. Education Agents are required to:
 - i. Be ethical and knowledgeable;
 - ii. Be up to date with current visa requirements, SIBT programs and the education environment;
 - iii. Monitor visa refusals, student feedback and application activity; and
 - iv. Adhere to the terms and conditions of their agreement with SIBT (and Navitas).

13 Appointment of Education Agents

- a) Guidelines for appointments are set out in the Navitas Educational Advisors' Management Policy and Procedures.
- b) Agents undergo a due diligence process prior to appointment.
- c) The Education Agent Agreement and Terms and Conditions incorporate acknowledgement by the Education Agent that they and their staff have read and understood the National Code Standards relating to agents and ESOS framework and agree and accept the terms and conditions outlined in the Navitas Agent Agreement.
- d) As the appointment of Education Agents spans the Navitas Group, the Agreement is signed by the Executive General Manager – Sales and Marketing.

14 Training and Monitoring of Education Agents

- a) As required under the Standard 4: 4.3.4 of the National Code of Practice 2018 Education Agents are required to have appropriate knowledge and understanding of the international education system in Australia, including the Australian International Education and Training Agent Code of Ethics.

14.1. Agent Training

- a) Education Agents receive updated information and training via a range of means, including:
 - i. Account management by a key central Navitas contact in each region or country;
 - ii. Regular face-to-face and online meetings and visits conducted by SIBT and Navitas staff, including training on programs, facilities, admissions processes, support services, accommodation and lifestyle. These engagements may involve staff from SIBT, Navitas colleges, offshore offices and travelling teams, as well as SIBT staff based at the Sydney City Campus or located offshore.
 - iii. Dissemination of hard copy and/or electronic brochures, posters and other marketing collateral;

- iv. Regular contact with SIBT Admissions and Marketing staff through;
 - Conference calls;
 - email conversations and electronic flyers agent familiarisation visits/tours to and of SIBT;
 - Partnering to represent SIBT at educational exhibitions;
 - Outcomes of student surveys; and
 - Newsletters.

14.2. Monitoring and Review

- a) Educational Agent performance is reviewed against the following criteria to determine if agreement should be renewed or archived:
 - i. The Educational Agent's compliance with the Navitas Educational Advisor Agreement, and Navitas Agreement Terms & Conditions;
 - ii. Number and conversion rate of students the Educational Agent has recruited during the term of agreement:
 - Student applications to offers; and
 - Offers to actual enrolment of students;
 - iii. Number of student visa refusals for students recruited by the Educational Agent;
 - iv. Any feedback or information from students or third parties regarding the Educational Agent; and
 - v. The quality, accuracy and currency of information and advice provided by the Educational Agent to students.
- b) Upon assessment of the above criteria, a recommendation to renew or archive the Agent account is made to Navitas Agent Management team

15 Dishonest or Unethical Conduct by an Education Agent

- a) As a registered provider of higher education, SIBT must ensure its Education Agents:
 - i. Declare in writing (and take reasonable steps) to avoid conflicts of interest with the provider;
 - ii. Observe appropriate levels of confidentiality and transparency in their dealings with overseas students or intending overseas students;
 - iii. Act honestly and in good faith, and in the best interests of the student;
 - iv. SIBT and Navitas must take immediate corrective action when becoming aware of dishonest or unethical behaviour such as engaging in false or misleading recruitment practices, of its Education Agent such as:
 - A deliberate attempt to recruit a student who has been studying with another provider for less than six months;
 - Facilitating the recruitment of a student who will not be able to comply with the conditions of his/her visa;
 - Creating a Confirmation of Enrolment, or causing one to be created, for anyone other than a bone fide student;
 - Deliberately providing information to a potential student, or to SIBT, which is incorrect or fraudulent;
 - Acting in a manner which is negligent, careless or incompetent;
 - Providing migration advice (unless authorised under the Migration Act).
- b) If SIBT or the Navitas Channel Partner Services team discovers an Education Agent has engaged in dishonest or unethical conduct, it will, through provision of the Agent Management Strategy, take immediate preventative and/or corrective action

appropriate to the nature of the conduct and ensure notices are uploaded to the Agent Management database. This could include:

- i. Additional training which highlights SIBT's expectations;
- ii. Not accepting students recruited by the education agent;
- iii. Terminating the agreement with the education agent; and/or
- iv. Alerting relevant Australian authorities of the situation.

16 Education Agent Contact Details

- a) SIBT performs routine checks to ensure accurate details of all Agents are published on its website. For Education Agents for with whom SIBT (Navitas) has a formal written agreement, the following information is maintained:
 - i. Country;
 - ii. Agency Name;
 - iii. Legal Entity;
 - iv. Name of Principle agent; and
 - v. Street Address/es.
- b) The details of these agents can be found at the Find an Agent section of the SIBT website.

17 Change of Education Agent

- a) Where a student contacts SIBT to advise they wish to change their education agents, SIBT will consider the request in accordance with the following conditions:
 - i. Where a student has made an application to study but has not accepted their offer or paid tuition fees, SIBT will accept a Nomination of Agent Form. The agent that is listed on the student's file at the time of accepting the offer and paying fees will be eligible for any commission payable;
 - ii. Where a student has accepted their offer to study at SIBT, and paid tuition fees, SIBT will not consider a change of agent. The agent that is listed on the student's file at the time of accepting the offer and paying fees will be eligible for any commission payable.
 - Any student that wishes to communicate directly with SIBT will be permitted to do so, regardless of whether they have accepted their offer or paid tuition fees. The agent that was originally involved with bringing the student to SIBT will be eligible for any commission payable if the student eventually enrolls. Any requests for information, that are received after the student has elected to communicate directly with SIBT, will be refused in accordance with the SIBT Privacy Policy.
 - iii. A student that has made a direct application may inform SIBT that they have selected an agent to assume responsibility by lodging the Nomination of Agent Form. SIBT will accept the form where the selected agent has a current SIBT Agency Agreement. The agent that is listed on the student's file at the time of accepting the offer and paying fees will be eligible for any commission payable.

18 Implementation and communication

- a) This policy and procedure will be implemented and communicated throughout the College via:
- the College's internal portal;
 - internal circulation to staff via email;
 - the College Policy Library; and
 - staff professional development (e.g., via induction and other means)

19 Responsibilities

| Responsibility | CDP | QCM | DMA | AM | MM |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----|-----|-----|----|----|
| Maintain currency of policy | A | | R | | |
| Review agent performance annually and submit to management committee | I | I | A | R | C |
| Liaise with Partner University each trimester on visa rejection statistics | I | I | A | R | I |
| Agent Training and Review in line with 2.9.1 and 2.9.3 | | | A | | R |
| Ensure Agent contact details on website is accurately reflected in the PRISMS database | | | A | R | C |
| R = Responsible, A = Approve, S = Supporting, C = Consulting, I = Informed. | | | | | |
| CDP = Campus Director & Principal, QCM = Quality & Compliance Manager, DMA = Director Marketing & Admissions, AM = Admissions Manager, MM = Marketing Manager | | | | | |

20 Review

- a) This Policy is reviewed a minimum of every three (3) years by the Responsible Officer and the Quality and Compliance Manager and at the time of any changes to the regulatory compliance requirements, legislation, regulation, and guidelines.