

1. Marketing Policy

Makeup School Sydney enables informed choice for clients and students by providing clear and factual information, whether this is done directly or by a third party. Makeup School Sydney is responsible for all marketing or other material disseminated on its behalf, regardless of the channel or method used.

Makeup School Sydney is conscious of the national requirements for the marketing of nationally recognised training and ensures that the information used is accurate, clear and managed ethically. Makeup School Sydney is subject to all relevant consumer protection law that applies in any jurisdiction where it operates and ensures it honours all commitments it makes.

Makeup School Sydney's marketing or advertising material is consistent with its training and assessment strategies.

Makeup School Sydney ensures its marketing of AQF qualifications to prospective students is ethical, factual and accurately represents the services it provides and the training products on its scope of registration.

General Marketing Collateral Requirements

- All Makeup School Sydney marketing materials are required to include the following requirements:
- Makeup School Sydney Code must be included;
- The relevant RTO responsible for the training and/or assessment and for issuing a qualification or statement of attainment must be absolutely clear to anyone viewing any marketing or advertising material;
- The NRT Logo is only used in accordance with the conditions of use as noted below;
- Marketing collateral makes clear where a third party is recruiting prospective students for Makeup School Sydney on its behalf;
- Marketing collateral distinguishes where Makeup School Sydney is delivering training and assessment on behalf of another RTO (internal to Makeup School Sydney or external partner RTO) or where training and assessment is being delivered on Makeup School Sydney behalf by a third party;
- Marketing collateral distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by Makeup School Sydney;
- Marketing collateral includes the code and title of any training product, as published on the National Register, referred to in that information;
- Marketing collateral includes any relevant currency information, such as whether a qualification has been superseded or removed from a training package;
- Makeup School Sydney only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- Makeup School Sydney only advertises or markets that a training product it delivers will enable students to obtain a licensed or regulated outcome where this has been confirmed by the industry regulator in the jurisdiction in which it is being advertised;
- Marketing collateral includes details about any income contingent loan, government funded subsidy or other financial support arrangements associated with Makeup School Sydney's provision of training and assessment; and
- Where Makeup School Sydney delivers training that is not nationally recognised (including school and higher education programs), you must clearly separate marketing or other information about this training from marketing and information about training that is nationally recognised.

1.1. No Guarantee

Makeup School Sydney does not provide any guarantee that:

- A student will successfully complete a training product on its scope of registration; or
- A training product can be completed in a manner which does not meet the requirements of the *Standards for RTOs 2015 (Cth)*; or
- A student will obtain a particular employment outcome where this is outside the control of Makeup School Sydney.

Conditions of Use of Nationally Recognised Training Logo

The *Nationally Recognised Training (NRT) Logo* is a distinguishable mark of quality for promoting and certifying national vocational education and training leading to AQF certification documentation. The NRT Logo is a registered trade mark.

Makeup School Sydney only uses the NRT Logo in line with the range of situations and conditions outlined below.

Advertisements and Promotional Information in any Medium

(Print, television, radio, banners, internet, etc.)

Makeup School Sydney uses the NRT Logo to promote only nationally recognised training that is within its scope of registration.

Makeup School Sydney ensures impressions are not be created that may lead an observer to conclude the NRT Logo applies to all training provided where this is not the case.

Where training is being promoted that does not meet the requirements stipulated in the VET Quality Framework (that is, non-accredited training) or is outside Makeup School Sydney's scope of registration, it is made clear the NRT Logo is not associated with that training.

Client Information

(Brochures, course handbooks, prospectuses, etc.)

Makeup School Sydney ensures that when it is promoting the training it offers and wishes to use the NRT Logo, its promotional material such as brochures, handbooks and prospectuses clearly distinguish between nationally recognised training within the scope of registration and that which is not nationally recognised.

Corporate Stationery, Business Cards, Buildings, Training Resources and Marketing Products

Makeup School Sydney does not use the NRT Logo on products such as corporate stationery, business cards, building signage, mouse pads, pens, satchels, packaging around products nor learning resources supporting training.

Certificates, Statements of Attainment and other Testamurs

Makeup School Sydney ensures the NRT Logo is correctly and accurately depicted on all AQF certification documentation issued. The NRT Logo is not depicted on other testamurs or record of results.

NRT Logo Specification

The NRT logo consists of both the triangular shape and the descriptor. The triangle is not to be used without the descriptor. The typeface is Fritz Quadrata. Under no circumstances is the descriptor to be typeset in any other typeface.

The complete NRT logo may be varied in size. The size and position of the NRT logo on the final product is at the discretion of the product designer. Although the size of the logo may be varied, the proportions of the triangle and the descriptor in relation to each other may not be varied. Under no circumstance is the logo to be reproduced in mirror image or be rotated.

Two colour reproduction

Where the NRT logo is reproduced in colour, it must comply with these colour requirements. Deviation from these colours is not permitted; nor are colours to be swapped around or stippled. The only colours to be used are:

- GREEN PMS 343
- RED PMS 192

One colour reproduction

Where the NRT logo is reproduced in one colour, it should preferably be in GREEN PMS 343 or, where this is not suitable, it may be reproduced in black. In some situations the background colour may clash or the logo may not be prominent. In those situations, the black logo may be reversed out to display in white.

Conditions of Use of Australian Qualifications Framework Logo

Makeup School Sydney only uses the AQF Logo in line with the range of situations and conditions outlined below.

Course Appropriateness

The AQF logo cannot be associated with education and training that does not lead to an AQF qualification. If promoting both AQF qualifications and qualifications that do not meet the requirements specified in the AQF,

Makeup School Sydney ensures it is made clear that the AQF logo is not associated with those that are not AQF qualifications. The impression must not be created that may lead an observer to conclude that the AQF logo applies to all education and training provided, if this is not the case.

Course within Scope of Registration

Makeup School Sydney may use the AQF logo to advertise or promote AQF qualifications that it is authorised to offer.

Permitted Collateral Uses

Makeup School Sydney may use the AQF logo on student information, advertising and promotional material.

Non-Permitted Collateral Uses

Makeup School Sydney ensures that the AQF Logo is not be used for corporate use including corporate stationery such as business cards and letterhead; building or other corporate signage; marketing products such as mouse pads, pens, satchels, product packaging; or educational resources used to support teaching and learning.

AQF Logo Specification

No element of the logo can be altered, moved or changed in any way. Under no circumstance is the logo to be reproduced in mirror image or be rotated.

The AQF logo must consist of both the circular/arrows shape and the words 'Australian Qualifications Framework' and be set in the typeface Gill Sans Light or Gill Sans Regular. The complete AQF logo may be varied in size but the proportions of the circle/arrows and the words in relation to each other may not be varied.

The minimum clear space required around the logo image is 10mm on all sides. No other graphic or text elements may appear within the clear space.

The AQF logo must always appear in:

- Its principal Pantone spot colours: PMS 144C, 3272C, 258C;
- Black C and white; or
- Reversed out of black.

Black and white reproduction

Where the AQF logo is reproduced in one colour, it must be in black and white.

Reversed out of black reproduction

Where the AQF logo is reproduced in one colour and it is used on backgrounds where black print will not be legible, reversed black and white may be used.

Testimonials and other References

Where Makeup School Sydney makes reference to another person or organisation (such as testimonials or photos) in marketing or advertising material, it has gained consent from the person or organisation for the use of that reference. This includes references via text, statements, logos and photos. Makeup School Sydney ensures all testimonials are true and correct before using them to endorse products.

All Makeup School Sydney students provide consent to the use of photos and other images that are taken at Makeup School Sydney learning activities and events, through the relevant release clause in the Makeup School Sydney *Enrolment Application Form*. Usage in these instances is generally one off, group images for general operational and promotional purposes.

Students are able to 'opt out' of this release if they wish, with all 'opt-outs' recorded in the *Makeup School Sydney Dropbox student Management System*.

Various Makeup School Sydney contractual arrangements with government stakeholders, enterprise clients and other third parties may routinely include consent for the use of information and images in marketing collateral, including the use of organisational logos and other trademarks.

For more specific advertising and marketing purposes, client consent is obtained and recorded using the *Marketing Consent Form*. Completed *Marketing Consent Forms* are stored in the *Marketing Register* located at:

128 Castlereagh Street, Sydney CBD, NSW 2000.

Government Loan, Funding, Subsidy or other Support

Where students would be accessing any government income contingent loan or subsidy, Makeup School Sydney provides details of these arrangements. Details include:

- Any costs associated (including interest or similar costs);
- Any debt that will be incurred; and
- Any loss of entitlement from the student undertaking a course at Makeup School Sydney.

This includes, in the cases of limited entitlement schemes, where students are only able to access one course or there are restrictions on what courses may be subsidised after completing their study at Makeup School Sydney.

Overseas Student Marketing Practices

Marketing information and practices

Makeup School Sydney ensures that the marketing and promotion of its courses and education services in connection with the recruitment of overseas students or intending overseas students, including through an education agent, is not false or misleading, and is consistent with Australian Consumer Law.

Makeup School Sydney, in seeking to enter into written agreements with overseas students or intending overseas students, does not provide any false or misleading information on:

- Its association with any other persons or organisations the Makeup School Sydney has arrangements with for the delivery of the course in which the student intends to enrol or may apply to enrol;
- Any work-based training a student is required to undertake as part of the course;
- Prerequisites—including English language proficiency—for entry to the course; or
- Any other information relevant to the Makeup School Sydney, its courses or outcomes associated with those courses.

Makeup School Sydney does not:

- Claim to commit to secure for, or on the student or intending student's behalf, a migration outcome from undertaking any course offered by the Makeup School Sydney; or
- Guarantee a successful education assessment outcome for the student or intending student.

Makeup School Sydney includes its CRICOS registered name and registration number in any written or online material that it disseminates or makes publicly available for the purposes of:

- Providing or offering to provide a course to an overseas student;
- Inviting a student to undertake or apply for a course; or
- Indicating it is able or willing to provide a course to overseas students.

Makeup School Sydney does not actively recruit a student where this conflicts with its obligations regarding Overseas student transfers.

Recruitment of an overseas student

Prior to accepting an overseas student or intending overseas student for enrolment in a course, Makeup School Sydney must make comprehensive, current and plain English information available to the overseas student or intending overseas student on:

- The requirements for an overseas student's acceptance into a course, including the minimum level of English language proficiency, educational qualifications or work experience required, and course credit if applicable;
- The CRICOS course code, course content, modes of study for the course including compulsory online and/or work-based training, placements, other community-based learning and collaborative research training arrangements, and assessment methods;
- Course duration and holiday breaks;
- The course qualification, award or other outcomes;
- Campus locations and facilities, equipment and learning resources available to students;
- Details of any arrangements with another provider, person or business who will provide the course or part of the course;
- Indicative tuition and non-tuition fees, including advice on the potential for changes to fees over the duration of a course, and the Makeup School Sydney's cancellation and refund policies;

- The grounds on which the overseas student's enrolment may be deferred, suspended or cancelled;
- The ESOS framework, including official Australian Government material or links to this material online;
- The policy and process the Makeup School Sydney has in place for approving the accommodation, support and general welfare arrangements for younger overseas students; and
- Accommodation options and indicative costs of living in Australia.

Education agents

Makeup School Sydney enters into a written agreement with each education agent it engages to formally represent it, and enter and maintain the education agent's details in PRISMS. Please refer to the Overseas Student section of the *Third Party Engagements Policy* for further information.

Jurisdictional Specific Marketing Requirements

The following jurisdictional specific marketing requirements also apply.

Australian Capital Territory

All information and services provided by Makeup School Sydney is fully disclosed so the student and/or employer can determine if the services advertised match what is being sought. The material is suitable for the target group. It must also contain accurate information about Makeup School Sydney. Where subcontracting arrangements are in place, these are made clear.

Promotion and publications

All information and services provided by Makeup School Sydney should be fully disclosed so the student and/or employer can determine if the services advertised match what is being sought. The published material must contain accurate information about Makeup School Sydney.

Makeup School Sydney ensures all publicity relating to training initiatives, including publications, promotional and advertising materials, public announcements and activities or any products or processes developed, is ethical, accurate and consistent.

Publications and promotion of training initiatives:

- Identify Makeup School Sydney's legal entity and/or trading name and RTO Code;
- Include the indicative fees for each course/qualification it offers under the specific training initiative; and
- Include an acknowledgement of any government funding as required under the specific training initiative.

Where Makeup School Sydney subcontracts any part of its training services to an RTO or other organisation that does not hold an agreement with the Territory, Makeup School Sydney applies for subcontracting arrangement approval and has a written agreement with the subcontracted party outlining the mandatory terms and conditions of the arrangement.

Where Makeup School Sydney subcontracts any part of its student recruitment services to a recruitment agent or broker, Makeup School Sydney:

- Advises the Territory in writing;
- Has a written agreement with the subcontracted party that ensures recruitment information and activities meet the specifications for each training initiative; and
- Ensures the subcontracted party is restricted from collecting personal information for the purpose of enrolment, conducting the initial skills assessment and collecting tuition fees.

Fees and charges

Makeup School Sydney publishes all fees and charges. Makeup School Sydney details its fees and charges including, but not limited to:

- Compulsory fees;
- Additional charges or co-contributions;
- Application process for exemptions and concessions;
- Methods of collection; and
- Refund information.

Makeup School Sydney ensures students, and where applicable the employer, are provided with information relating to fees and charges prior to enrolment.

Makeup School Sydney ensures students are provided with information regarding eligibility for the completion payment prior to enrolment.

Australian Apprenticeships

All information and services provided by Makeup School Sydney is fully disclosed so the student and/or employer can determine if the services advertised match what is being sought. The material is suitable for the target group. It must also contain accurate information about Makeup School Sydney.

Promotion and publications

Makeup School Sydney supplies promotional information to Apprenticeship Network Providers (ANPs), brokers and employers in industry areas covered by the qualifications Makeup School Sydney is approved to deliver on the ACT Qualifications Register.

Makeup School Sydney ensures its published tuition fees for each delivery mode match the fees published on the ACT Qualifications Register. Where changes to tuition fees have occurred, evidence of historical fees is retained.

Where an RTO subcontracts the delivery of units of competency to another RTO, the student and employer is provided with information outlining the subcontracting arrangements prior to the finalisation of enrolment.

New South Wales

NSW Smart & Skilled Program

Makeup School Sydney::

- Only markets, publicises or otherwise communicates its connection to Smart and Skilled in accordance with the Smart & Skilled Contract and Operating Guidelines.
- Publishes and makes available readily accessible information on all of its approved qualifications.
- Acts in good faith and does not act in any way that could be seen to be unethical, reckless, illegal or dishonest conduct, in relation to any matter.
- Does not do anything that may bring into disrepute or be detrimental to the Department, any Government Agency, Smart and Skilled or vocational education and training.
- Notifies the Department if Makeup School Sydney becomes aware of any unethical, reckless, illegal or dishonest conduct in relation to vocational education and training, including fraud or misconduct.

Subcontracting and Brokering

Subcontracting includes an arrangement where Makeup School Sydney defers day-to-day responsibility for all or part of the material operative or administrative functions of Makeup School Sydney or the management and conduct of training delivery and assessment activities for Subsidised Training to another individual or organisation (the subcontractor).

Brokering Arrangement means an arrangement between Makeup School Sydney and another person for that person to:

- Recruit students, or enrol students, or accept applications for enrolment, in subsidised training;
- Market, or provide information or advice in relation to, subsidised training;
- Assist students to complete or submit applications for subsidised training; or
- Assist, or provide support for, students who could be eligible for subsidised training to complete any assessments required to show that students are academically suited to undertake the subsidised training.

Makeup School Sydney does not subcontract any part of its obligations under the Smart and Skilled Contract, or enter into any Brokering Arrangement in relation to the Smart and Skilled Contract, without the Department's consent in accordance with the Smart and Skilled Operating Guidelines.

Please refer to the *Third Party Engagements Policy* for further information.

Setting up Brokering Arrangements

Brokering Arrangements are documented and transparent. The information in any Brokering Arrangement clearly outlines all the activities that the broker will undertake for Makeup School Sydney.

Makeup School Sydney is responsible for oversight of the broker including developing and implementing a plan for monitoring the performance of, and compliance with Makeup School Sydney's obligation in the Smart and Skilled Contract by, the broker.

Makeup School Sydney's obligations to the enrolled student under Smart and Skilled extend to the broker, and it is Makeup School Sydney's responsibility to ensure that these are met.

Makeup School Sydney is accountable for, and systematically monitors, compliance with the Smart and Skilled Contract, including all activities arranged by Makeup School Sydney through the broker.

Makeup School Sydney ensures that the broker does not subcontract.

Makeup School Sydney's Consumer Protection Policy must manage and respond to allegations involving the conduct of the broker (including its staff). Any Brokering Arrangement the Department considers is not in the best interests of enrolled students are ceased.

Marketing Smart and Skilled

All marketing, promotional, communication and information materials used by Makeup School Sydney related to Smart and Skilled (including Makeup School Sydney's approved qualifications) displays Makeup School Sydney's legal name and code as displayed on the national register, training.gov.au.

Makeup School Sydney develops and implements strategies for the effective marketing and promotion of Smart and Skilled including all of its approved qualifications. These strategies do not rely solely on activities undertaken by the Department and via the Smart and Skilled website for promotion. Makeup School Sydney retains copies of these strategies and all marketing and promotion materials to demonstrate implementation of the strategies.

Makeup School Sydney takes steps to ensure that any prospective student, who may be reasonably considered to be eligible to receive subsidised training, is properly informed about the availability of subsidised training under Smart and Skilled. This is done as soon as practicable after the prospective student contacts Makeup School Sydney. Makeup School Sydney has no obligation however to market or promote any approved qualifications where its Smart & Skilled Financial Cap has been or is likely to be exceeded.

Department intellectual property

Makeup School Sydney does not use any logo, product names, icons, trademarks or other intellectual property of the Department, or the NSW Government, including in connection with Smart and Skilled without written permission from the Department or the NSW Government and subject to any guidelines that are issued from time to time.

Acknowledgement of source of subsidies and restrictions on promotion

Makeup School Sydney explicitly acknowledges in marketing and information for Prospective Students the availability of subsidies from the NSW Government. In any communications about Smart and Skilled (including regarding approved qualifications) Makeup School Sydney uses the statement:

'This training is subsidised by the NSW Government.'

Makeup School Sydney does not suggest, or allow there to be any misunderstanding, that the subsidised training is 'free of charge', discounted or subsidised by Makeup School Sydney or any other third party.

Makeup School Sydney does not, and ensures that its agents and contractors do not, market, publicise or otherwise communicate information about the training or engage in any other conduct that may have the effect of encouraging students to choose a Provider based on price or other inducements (including any financial or other benefit).

To be clear, this includes the following types of inducements (including any gift, financial or other benefit):

- The provision of an electronic device (e.g. tablet or an iPad) that is not specifically required to receive the subsidised training;
- An inducement to enrol by a particular date; or
- An inducement to refer any students to Makeup School Sydney.

Website

Makeup School Sydney maintains a current and accurate website. The homepage of Makeup School Sydney's website contains a direct link to the Smart and Skilled website so that any person accessing Makeup School Sydney's website should be able to easily and directly navigate to the Smart and Skilled website.

Makeup School Sydney's website includes the following:

- The details of all of Makeup School Sydney's approved qualifications;

- Details of the Notification of Enrolment Process and Makeup School Sydney's enrolment process including the information and evidence that the student must provide (such as, all consents and declarations the student must make) together with details of when such information and evidence is required; and
- The process for obtaining a Unique Student Identifier.

Consumer Protection Information

Makeup School Sydney makes the following information available to students:

- Makeup School Sydney Consumer Protection Policy (including the contact details of the consumer protection officer)
- The Consumer Protection Strategy; and
- The contact details for the Department's Customer Support Centre (as provided by the Department from time to time).

www.smartandskilled.nsw.gov.au

1300 77 21 04

Student Information

Makeup School Sydney ensures that all students considering enrolling in subsidised training receive, or are aware of how to access, certain information, either electronically or in hard copy form before enrolment which is designed to make these students aware of policies relating to their training, including their rights and responsibilities and avenues for complaint.

This Student Information includes:

- The Fee Information;
- Information regarding Recognition of Prior Learning, Credit Transfer, deferring or discontinuing Subsidised Training (including any implication on fees);
- VET Student Loans Program Information (if applicable);
- Subcontractor Information (if applicable);
- What the Enrolled Student should do if they want to defer or discontinue their Training;
- How to access support and assistance during the training; and
- Contact details for various support services within Makeup School Sydney, e.g. interpreter services.

Queensland

Vocational Education and Training (VET) Pre-qualified Supplier (PQS) Agreement

Marketing

Makeup School Sydney does not make any misleading public statements, including any statements to Students, employers or any organisation, about the Agreement and any Program, the level of funding or actions taken by the Department under the Agreement.

Makeup School Sydney, in making any public statements in relation to the Training and Assessment funded under this Agreement, includes an acknowledgment of the funding received from the Department and such acknowledgment will be on terms reasonably approved by the Department.

Makeup School Sydney's marketing and promotional material:

- Refers to the Program as specified from time to time by the Department;
- Does not contravene any Department directive or publication/marketing guideline relating to the marketing of Program; and
- Refers to Program(s) by such name as is specified from time to time by the Department.

Makeup School Sydney does not use the logo of the State of Queensland or the Department or any other intellectual property of the Department on any advertising, promotional, training or other material unless the Department, in its absolute discretion, has given its prior written approval to the same and where such approval is granted by the Department, it may be granted on such terms and conditions as the Department determines.

Makeup School Sydney does not give, or agree or offer to give, to another person any valuable consideration with a view to securing the enrolment with the Supplier of a Student or prospective Student in relation to a Qualification funded under a Program. This includes:

- a Student;
- a prospective Student; and
- a person who refers or offers to refer Students or prospective Students to Makeup School Sydney.

Makeup School Sydney ensures only the Department, the Supplier and no other person markets, promotes or advertises Makeup School Sydney's status as a Pre-qualified Supplier or Makeup School Sydney's capacity to claim funding under the Program except with the prior written consent of the Department.

Disclose information upfront to enable informed consumer choice

Makeup School Sydney publishes in a prominent and easy-to-access location on its website the total co-contribution fees — concessional and non-concessional — to be charged to an enrolled student for each qualification or skill set it is approved to deliver under a program.

Makeup School Sydney provides a prospective student with notice of the co-contribution fee relevant to the student's circumstances prior to enrolment in the qualification or approved skill set.

Makeup School Sydney provides prospective students with a copy of, or access to, its refund policy prior to enrolment. The refund policy must meet the requirements under the Standards for Registered Training Organisations (RTOs) 2015.

Makeup School Sydney refers prospective student to any applicable student fact sheet for the relevant program published on the department's training website, so they have access to independent information and a point of contact with the department.

Makeup School Sydney only represents itself to the marketplace as a PQS for a program, or as a PQS for a specific qualification or skill set under a program, on or after the start date approved in writing by the department to deliver the qualification or skill set.

Makeup School Sydney does not permit, engage or allow a third party to market the program(s) and Makeup School Sydney's participation in the program(s).

Marketing and disclosure directives

No third party marketing

Makeup School Sydney ensures that no third party, irrespective of the nature of the relationship it has with Makeup School Sydney, must not market or advertise the program or Makeup School Sydney's participation in the program.

The department defines a third party as any entity, organisation or person that is not a part of the registered training organisation (RTO) entity that has been awarded PQS status (for example, a broker, those not employed by the PQS nor within its organisational structure such as a director).

A third party operates as a separate entity in the marketplace, either with or without a contract or agreement with Makeup School Sydney. For example, the department does not permit a third party to advertise employment opportunities with the sole purpose of referring individuals to training offered by Makeup School Sydney.

Note: A third party with expertise in marketing or similar is exempt from this principle if it has only been engaged by the Makeup School Sydney to provide advice, services or assistance within the department's marketing directives.

Clearly identify the program

Makeup School Sydney ensures all marketing or advertising includes:

- the correct and full name of the funding program
- acknowledgement of the Queensland Government and the department as the funding source by stating — 'funded by the Queensland Government'.

It is not acceptable to use abbreviations in marketing or advertising material. The Certificate 3 Guarantee program must appear as 'Certificate 3 Guarantee program' or 'Certificate 3 Guarantee' and not appear as C3G or Certificate III Guarantee. The Higher Level Skills program must appear as 'Higher Level Skills program' or 'Higher Level Skills'.

Queensland Coat of Arms

Makeup School Sydney does not use the Queensland Coat of Arms or other Queensland Government logos or intellectual property, with the exception of public vocational education and training (VET) providers with the required Queensland Government authorisation to do so.

Advertise appropriate qualification levels

Makeup School Sydney is only permitted to market or advertise the vocational qualification level primarily targeted by the program (for example, Certificate 3 Guarantee targets certificate III level vocational qualifications). The marketing or advertising of lower- level vocational qualifications is only permissible when the qualification is either:

- a pre-apprenticeship qualification providing basic trade skills to facilitate recruitment into a related apprenticeship
- delivered as part of a VET in Schools (VETiS) program.

Responsible marketing practice

Makeup School Sydney does not:

- market or advertise itself to the marketplace as an RTO for a program prior to the start date approved by the department;
- market or advertise a qualification or course under a program prior to the start date approved by the department;
- market or advertise qualifications that are not eligible for Queensland Government funding under the program, or suggest they are part of a Queensland Government-funded program;
- market, advertise or offer any gift or other benefit to a student, prospective student, employer or any other person which, in the department's reasonable opinion, is considered to be an inducement or likely to influence the student, prospective student, employer or any other person to enrol with Makeup School Sydney;
- indicate the training is fee-free when a co- contribution fee is mandated under the program policy for the student cohort;
- market or advertise program details which are inaccurate or no longer current; or
- make references to government funding that could be misleading.

Information disclosure requirements

Makeup School Sydney provides prospective students and participating employers (if applicable) with a range of information upfront and prior to enrolment, to inform their decision making and selection of a course and training provider.

The following information is supplied to consumers prior to enrolment:

- Makeup School Sydney provides specific information about the program, qualification or course and co-contribution fee charges as prescribed in the relevant program policy. This includes the requirement to refer prospective students to the department's student fact sheets developed for programs, so they have access to independent advice and a point of contact within the department if needed.
- Makeup School Sydney discloses and publishes in a prominent location on its RTO website, the concessional and non-concessional co-contribution fees it will charge for each qualification it is approved to deliver under a program and include with the fee information all pertinent information about the offering. The fee is labelled as the 'co-contribution fee' on the RTO website so it is easily identifiable. The co-contribution fee must represent the total cost to the student to enrol in the offering, undertake training and be awarded the qualification.
- Makeup School Sydney provides a copy of, or access to, its complete refund policy terms and conditions.
- Makeup School Sydney discloses if training and/or assessment is being delivered on its behalf by a third party.

Co-contribution fee

Makeup School Sydney discloses upfront concessional and non-concessional fees and clearly publish and label them on its website as the co-contribution fee, along with all pertinent information about the offering. This allows prospective students to be clearly informed of all fee costs and able to compare fees for a qualification across different RTOs. Makeup School Sydney also provides prospective students with a copy of, or access to, its refund policy prior to enrolment.

User Choice

Makeup School Sydney details its fees and charges policy, including full costs, method of collection, refunds, and exemptions prior to enrolment and provide access to this written policy to apprentices and trainees.

Certificate 3 Guarantee

Makeup School Sydney informs prospective students they will no longer be eligible for a government subsidised training place under the Certificate 3 Guarantee once they complete a certificate III level vocational qualification

Makeup School Sydney discloses upfront to prospective students and clearly publish on its website the co-contribution fee for concessional and non-concessional students for each qualification it is approved to deliver under the program. The fee must represent the total cost to the student to enrol, undertake training and be awarded the qualification. It is not permissible to offer or publish fee-free training, except for the student categories listed in the policy.

Makeup School Sydney provides prospective students, prior to enrolling, with its refund policy outlining what the student is entitled to (full or part refunds).

Makeup School Sydney direct each student to the department's Certificate 3 Guarantee student fact sheet.

Makeup School Sydney supplies each student with a training fact sheet or written summary of information for the qualification which includes:

- a breakdown of all costs, including how and when fees will be charged and collected at the unit of competency level;
- training timelines, delivery mode, delivery location and vocational or work placement when this is a mandatory component of the qualification under the training package;
- support services available to assist students to complete training; and
- a requirement to complete a student training and employment survey within three months of completing or discontinuing the qualification (see the student training and employment survey fact sheet).

Higher Level Skills

Makeup School Sydney informs prospective students they will no longer be eligible for a government subsidised training place under the Higher Level Skills program once they complete one certificate IV level or higher qualification.

Makeup School Sydney discloses upfront to prospective students and clearly publish on its website, the co-contribution fee for concessional and non-concessional students for each qualification it is approved to deliver under the program. The fee must represent the total cost to the student to enrol, undertake training and be awarded the qualification. It is not permissible to offer or publish fee-free training.

Makeup School Sydney provides prospective students, prior to enrolling, with its refund policy outlining what the student is entitled to (full or part refunds).

Makeup School Sydney directs each student to the department's Higher Level Skills student fact sheet.

Makeup School Sydney supplies each student with a training fact sheet or written summary information for the qualification or skill set which includes:

- a breakdown of all costs including how and when fees will be charged and collected at the unit of competency level;
- training timelines, delivery mode, delivery location, and vocational or work placement when this is a mandatory component of the qualification under the training package;
- support services available to assist students to complete training; and
- a requirement to complete a student training and employment survey within three months of completing or discontinuing the qualification or skill set.

South Australia

Other third party entities may not represent the project or dilute the relationship between XYZ RTO and the funding source (WorkReady). No re-branding by a third party organisation is permitted.

All advertising and promotional material, including websites and other media platforms, relating to WorkReady funded activity, Makeup School Sydney undertakes to:

- Include the statement: 'Eligibility and subsidy criteria apply' OR 'visit www.skills.sa.gov.au for eligibility and subsidy criteria';
- Clearly identify any participation and eligibility conditions that exist in relation to the project activity;
- Not pay or offer, either directly or indirectly, incentives to undertake WorkReady funded activity;
- Clearly identify any co-contribution requirements and/or details of any other incidental expenses and costs that may be incurred by an eligible participant;
- Use the phrase 'subsidies may apply' in place of 'fee free' or 'no cost'; and

- Include the horizontal or vertical WorkReady logo with the supported by Government of South Australia logo.



OR, in cases where there is limited space, include the statement 'Supported through WorkReady by the Government of South Australia' and the supported by Government of South Australia logo (not required to be co-located).



When promoting WorkReady funded activity a strict hierarchy of support is observed.

The funding source (WorkReady and Government of South Australia) must be recognised as the primary support for the funded activity and represented first and most prominent. That is, the logos must appear first, either at the base, side panel or header of the marketing material, and any text reference should clearly refer to the project as a WorkReady project.

All other RTOs and supports may follow the primary funding source, and/or in order of contribution, as indicated below:

- Proponent (Makeup School Sydney);
- Employers or Employer Associations (as detailed in the funding application as supporting the project);
- Group Training Organisations or Trade Associations (as detailed in the funding application as supporting the project); and
- Other supports (in kind or otherwise, as detailed in the funding application).

The preferred option is to reference the funded organisation first (proponent), then the funding source (WorkReady), then follow with other supporting organisations, as indicated in the funding agreement, following with reduced size logos (see suggestions below). Organisations not reflected as a contributing partner in the funding agreement cannot be included.



Use of the WorkReady logo

- Use of the logo is restricted to activity Makeup School Sydney is contracted to deliver under WorkReady.
- Makeup School Sydney only uses the black and white (mono) WorkReady logos.
- AB RTO does not alter the image templates in any way. No part of the image may be recreated or redrawn and the logo must always retain its original proportions. Proportions are maintained by holding down the shift key when re-sizing images. The logo may not be rotated.

Technical specifications for use of the WorkReady logo

- The minimum size of the WorkReady logo is 5mm ('W' cap height). This applies to every design form, variation and all applications. The wordmark must be reproduced in relevant proportion to the scale of the design in which it appears.
- The identity must be protected by an isolation zone of clear space at all times, equal to the size of the "W" (this applies to every version and all applications).
- It must be free of background colour changes.
- Reversed WorkReady logos should only be used when the background colour is dark enough to provide strong contrast against the logo and it does not blend into the background colour.

Technical specifications for use of the Government of South Australia logo

- The minimum size of the roundel is 10mm in diameter. The logo should not be altered in any way. No part of the image may be recreated or redrawn and the logo must always retain its original proportions (proportions are maintained by holding down the shift key when re-sizing images). The logo may not be rotated.
- The logo must be protected by an isolation zone of 5mm of clear space on all sides, equal to half the size of the roundel (this applies to every version and all applications).
- The logo must be free of background colour changes.
- Reversed Government of South Australia logos (white) should only be used when the background colour is dark enough to provide strong contrast against the logo.

Online and social media applications

- Makeup School Sydney references WorkReady funded activity online as they would for print advertising and promotional materials.
- Advertisements provide a link to direct interested parties to Makeup School Sydney's website – the site must include appropriate WorkReady brand referencing and eligibility criteria.

Tasmania

Skills Tasmania Funding Agreement

Any promotion of training subsidised must acknowledge the assistance of Department of State Growth with the words: *'This training is subsidised by the Department of State Growth, Tasmania'*.

Where Makeup School Sydney wishes to invite a member of the State or Commonwealth Parliament to attend a graduation or other public event associated with the training purchased or subsidised under this agreement, Makeup School Sydney must advise Skills Tasmania of that intention prior to the finalisation of such arrangements so that all parties concerned can be adequately briefed.

Victoria

Makeup School Sydney ensures all Training Services are in compliance with the requirements of all Laws in any way affecting or applicable to the provision of the Training Services, including Laws relating to occupational health and safety and the Australian Consumer Law.

Makeup School Sydney:

- Does not do or omit to do anything which may damage, ridicule, bring into disrepute or be detrimental to the Department, the VET sector, the Skills First Program, the Victorian government subsidised training market, or the Department's or the State's name or reputation;
- Behaves honestly and in a way that upholds the objectives and values of the Skills First Program;
- Does not behave in a manner that damages the public confidence in the integrity of the
- Skills First Program;
- Does not pay, provide or offer, either directly or indirectly, Incentives to undertake training subsidised through the Skills First Program, whether to any prospective student or to any other person (such as an employer or social organisation).
- Markets and promotes the courses and qualifications within its Funded Scope in accordance with all applicable Laws, including the Australian Consumer Law;
- Markets and promotes the courses and qualifications within its Funded Scope with integrity and accuracy;
- Acts in an honest, ethical and responsible manner when promoting the courses and qualifications within its Funded Scope to prospective students and recruiting students into those courses and qualifications;
- Ensures that all prospective students are accurately informed about:
 - the nature and requirements of the Training Provider's training;
 - the financial arrangements in respect of the Training Provider's training, including the cost to and other financial impacts on the prospective student;
 - training hours and commitment; and
 - the assessment and expected outcomes of the training;
- Does not engage in false or misleading advertising, promotion or recruitment practices, including by not making:
 - any false or misleading comparisons between Makeup School Sydney or any of its training and any other education provider or their courses;
 - any inaccurate claims of association of Makeup School Sydney with any other education provider; or
 - false or misleading representations regarding the quality or outcomes of Makeup School Sydney's training (including employment and immigration outcomes);
- Does not engage in any unconscionable conduct in marketing and promoting the courses and qualifications within its Funded Scope, including taking advantage of any prospective student's vulnerability (including due to their age, disability or illiteracy) to recruit them into a course or qualification;
- Does not market or promote as being delivered wholly online any qualification listed on the Online Delivery Restriction List or any other qualification delivered as an Apprenticeship; and
- Conducts all promotional and recruitment activities in accordance with the Victorian Skills First Quality Charter.

In any promotional publication, report, signage or other material prepared by (or on behalf of) the Makeup School Sydney relating to the Training Services, Makeup School Sydney s:

- Acknowledges in a prominent way that the Training Services are provided to Eligible Individuals with Funds made available by the Victorian and Commonwealth Governments, by stating that:

"This training is delivered with Victorian and Commonwealth Government funding")
- Does not, without the prior written approval of the State or the Department, use any logo or trade marks of the State or the Department;
- Ensures that such materials meet the requirements of the *Equal Opportunity Act 2010 (Vic)* and related Laws, including the provision of materials encouraging individuals with disabilities to access training

subsidised through the *Skills First* Program;

- Identifies the Makeup School Sydney legal entity and/or trading name and RTO Code;
- Refers on its website and corporate materials to the identity of any subcontracted party, and the respective roles in the provision of training and assessment, in relation to any Training Services to which a subcontract arrangement applies; and

If Makeup School Sydney is not authorised to deliver courses or qualifications on the Foundation Skills List, it ensures that it is made clear to prospective eligible individuals that any such delivery by Makeup School Sydney is not eligible for subsidisation by the Victorian government.

Makeup School Sydney publishes a summary of its latest registration audit information in a prominent position on its website. The minimum registration audit information to be published is as follows:

- Audit date;
- Qualifications audited (list all qualifications audited on the above audit date); and
- Audit outcomes as follows:
 - audit non-compliance identified: Yes / No;
 - a summary of significant and/or critical non-compliances and actions taken to rectify; and
 - non-compliances rectified: Yes / No / Not Applicable.

Makeup School Sydney publishes in a prominent place on its website:

- Standard fees for training subsidised through the *Skills First* Program for each course/qualification it offers under this VET Funding Contract. This information must be kept up to date and include the following caveat:

‘The student tuition fees as published are subject to change given individual circumstances at enrolment’
- Details of any other fees including student services, amenities, goods or materials;
- A list of all providers of Brokering Services used by Makeup School Sydney; and
- Makeup School Sydney’s online service standards as prescribed by the Department from time to time.
- Its complaints and appeals process.

Makeup School Sydney has registered for, and maintains an up to date profile on, the Victorian Skills Gateway.

Western Australia

Student Recruitment & Selection

Student recruitment is the result of a genuine training need. Makeup School Sydney does not advertise, offer or provide incentives or inducements to students to enrol in Training Courses that could be viewed as seeking a competitive advantage.

Students are selected in a way that shows fair access to training to the level required within the:

- WA Equal Opportunity Act 1984; and
- Disability Services Act 1993, including implementing to the extent possible, the Department’s Disability Access and Inclusion Plan (DAIP).

Makeup School Sydney takes responsibility for its own marketing and recruitment of students.

All Future Skills WA marketing is ethical, clear, accurate and not misleading.

Makeup School Sydney publishes information relating to Future Skills WA funded courses on its website which includes:

- The indicative fee/s for all courses and qualifications; and
- The caveat “*The student tuition fees are indicative only and are subject to change given individual circumstances at enrolment. Additional fees may apply such as student service and resource fees*”.

Promotional material used by Makeup School Sydney for government subsidised training offered under the Contract includes:

- The Future Skills WA Word mark, in accordance with the most current issue of the Word Mark Guide;
- The indicative fee/s for all courses and qualifications; and

- The caveat “*The student tuition fees are indicative only and are subject to change given individual circumstances at enrolment. Additional fees may apply such as student service and resource fees*”.

Makeup School Sydney does not suggest, or allow there to be any misunderstanding, that the Subsidised Training is 'free of charge', discounted or subsidised by Makeup School Sydney or any other third party.

Makeup School Sydney does not market, publicise or otherwise communicate information about the training or engage in any other conduct that may have the effect of encouraging students to choose Makeup School Sydney based on price or other inducements (including any financial or other benefit).

Future Skills Word Mark

Makeup School Sydney includes the Future Skills Word Mark logo on all employer facing communication relevant to courses funded by the Department. Where no reference is made to a funded course there is no requirement to use the Future Skills Word Mark logo.

The following copy is also included within Makeup School Sydney advertisements either at the end of the main body copy or as a base to the advertisement:

“A Future Skills WA course, subsidised by the Department of Training and Workforce Development.”

It is mandatory to use the Future Skills Word Mark logo on:

- Advertising;
- Publications including course brochures and flyers;
- Public relations;
- Website; and
- Course enrolment collateral.

The Future Skills Word Mark logo is a carefully balanced design and therefore no alterations to the composition or proportions may be made. The Future Skills Word Mark logo is not be reduced in size to less than 41mm wide. The aspect ratio is maintained when resizing the logo.

Only one Future Skills Word Mark logo appears on any one page. The Future Skills Word Mark logo is not obscured by or placed over the top of any text or other logo.

Minimum logo size is 41mm x 11mm.

The Future Skills Word Mark logo may be positioned at the top left or right, or lower left or right of the layout. Where the Makeup School Sydney logo and Future Skills Word Mark logo are grouped together the minimum spacing between the two logos is 11mm.

The Future Skills WA word mark is only used in Pantone 7468 or mono (either black or white reversed out of a dark background).

VET Student Loans

Makeup School Sydney ensures that any marketing of its approved courses prominently mentions:

- XTZ RTO's name and any registered business name or other business name that XY Makeup School Sydney Z RTO uses;
- Makeup School Sydney's registration code; and
- The maximum tuition fees for the course.

A VET Student Loans approved course is not marketed by Makeup School Sydney unless the tuition fees for the course have been published on Makeup School Sydney's website in a way that is readily accessible by the public.

Makeup School Sydney ensures that any marketing in which Makeup School Sydney mentions the possible availability of a VET student loan (however described) for students undertaking a course:

- Prominently mentions:
 - Makeup School Sydney's name and any registered business name or other business name that Makeup School Sydney uses; and
 - Makeup School Sydney's registration code; and
 - that VET student loans will not be approved for students who do not meet eligibility requirements; and
 - that a VET student loan gives rise to a HELP debt that continues to be a debt due to the Commonwealth until it is repaid; and

- Presents the information in a font size that is approximately the same as any other marketing information that accompanies it; and
- If the marketing is online—presents the information on the same webpage as the other marketing of the course; and
- If the marketing uses the VET student loans logo—presents the logo in accordance with the style guide for the use of the logo published on the Australian Government Department of Education & Training's website.

Makeup School Sydney never represents, whether by publishing or otherwise, that a VET student loan is not a loan; or does not have to be repaid.

Makeup School Sydney ensures that, for all students enrolling in a course on the basis that some or all of the tuition fees for the course are covered fees, on the day before the student is enrolled, the tuition fees for the course were available on Makeup School Sydney's website in a way that was readily accessible by the public.

Social Media

Makeup School Sydney ensures that any marketing of Makeup School Sydney or its courses through social media does not mention the possible availability of a VET student loan (however described) for students undertaking a course.

Inducements

Makeup School Sydney may from time to time offer benefits to potential students in the form of marketing merchandise up to the total value of \$30 per person.

Makeup School Sydney never offers or provides a benefit, or cause a benefit to be offered or provided, where the benefit would be reasonably likely to induce a person to apply for a VET student loan for a course.

Brokers & Agents

- Makeup School Sydney does not enter into an arrangement (whether written or not) that provides for another person to do one or more of the following in relation to a VET Student Loan's approved course:
 - enrol students, or accept applications for enrolment, in the course;
 - provide information or advice in relation to VET student loans (however described) for the course;
 - assist students to complete or submit applications for a VET student loan for the course;
 - assist, or provide support for, students who could be eligible for a VET student loan for the course to complete any assessments required to show that students are academically suited to undertake the course.

This does not apply in relation to an arrangement that is a contract of employment.

Makeup School Sydney does not pay its staff commissions, benefits or bonuses (however described) that have any connection (whether direct or indirect) with the number of students who are enrolled by Makeup School Sydney and whose tuition fees are paid (whether wholly or partly) using VET student loans.

Use of third party contact lists

Makeup School Sydney will only use third party contact lists for the purposes of approved courses for VET Student Loans where the student has given express consent to being contacted by Makeup School Sydney.

Specifically, Makeup School Sydney does not, where student's contact details are received from another person; contact the student to market, advertise or promote a course, or enrol the student in a course where when doing so, or as a result of doing so, mention the possible availability of a VET student loan (however described) for students undertaking the course, unless the student has given express consent to being contacted by Makeup School Sydney.

The student is taken to have provided express consent if:

- 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; and
- The request was prominent; and
- The student was able to give consent in a separate optional tick box from other consents; and
- The request was not a required field to be answered in order for a person to submit other information; and
- The request did not include a default tick for consent; and

- The request named Makeup School Sydney; and
- 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.

The student is taken to have provided express consent if the student initiates contact with a third party for the purpose of:

- Giving information relating to education and training to Makeup School Sydney; or
- Getting information relating to education and training from Makeup School Sydney.

Engaging in cold-calling

Cold-calling includes making unsolicited contact with a student:

- In person; or
- By telephone, email or other form of electronic communication.

Makeup School Sydney does not cold-call another person to market, advertise or promote a course and when doing so, or as a result of doing so, mentions the possible availability of a VET student loan (however described) for students undertaking the course.

Providing information before enrolment

Makeup School Sydney ensures that students seeking to enrol in an approved course:

- Are fully informed of the tuition fees and any other fees that apply to the course; and
- Are clear about their responsibilities, obligations and rights if they enrol in the course; and
- Are clear about their responsibilities, obligations and rights if they apply for a VET student loan.

Before enrolling a student in an approved course, Makeup School Sydney gives the student the following information:

- All information required to be provided under the Standards for NVR Registered Training Organisations that relates to ensuring that each student is properly informed and protected;
- The tuition fees for the approved course;
- Any fees other than tuition fees that are payable for the course;
- The student's options for paying tuition fees, including:
 - payment by the student as fees become due; and
 - a VET student loan;
- Information about VET student loans, including that:
 - it is a loan from the Commonwealth; and
 - the loan will remain a personal debt until it is repaid to the Commonwealth; and
 - the loan may, until the debt is repaid, reduce a student's take-home (after-tax) wage or salary and may reduce the student's borrowing capacity; and
 - a student may wish to seek independent financial advice before applying for a loan;
- The criteria for being an eligible student for a VET student loan;
- The application process for a VET student loan;
- An explanation that the student may be required during the course to communicate his or her agreement that the Secretary continue to use the VET student loan to pay tuition fees for the course;
- The maximum amount of a VET student loan that may be available for the course under section 8 of the Act (not taking into account the effect of paragraph (b) of that section), and an explanation that the amount of the loan cannot be greater than the student's remaining FEE-HELP balance;
- The amount of HELP debt the student would accrue if the student received the maximum amount of VET student loan for the course (the debt could be up to 120% of the loan);
- An explanation that the tuition fees will be reasonably apportioned across a specified number of sequential fee periods and that each fee period will contain at least one census day;
- Information about census days, including:
 - the meaning of a census day (in accordance with the definition of census day in the Act); and
 - that a student may cancel the student's enrolment in the course or part of the course using Makeup School Sydney's procedure for withdrawal; and
 - if a student withdraws before the census day for a course or part of a course, the student will not incur a VET student loan debt for the course or part of the course and will receive a refund for any tuition fees already paid for the course or part of the course;
- How to access the following on the approved course provider's website:
 - the tuition fees for the course;

- the census days for the course;
- Makeup School Sydney's procedures for withdrawal from the course and cancellation of enrolment;
- other procedures Makeup School Sydney is required to have by this instrument.
- Advice that it is important for an enrolled student to notify Makeup School Sydney of any change of contact details.

Marketing Collateral Approval Process

Before use, Makeup School Sydney ensures all marketing collateral is checked and approved by Makeup School Sydney Chief Executive Officer, followed by final authorisation from the Chief Executive Officer.

Marketing materials are approved using the *Marketing Approval Form*, and once approved are recorded in the *Marketing Register*. Completed Marketing Approval Forms are stored with the relevant marketing collateral in the *Marketing Register* located at:

<<Insert location>>.

Makeup School Sydney monitors all marketing activities and collateral on an ongoing basis to ensure it remains current and accurate.

Promotional Methods

Makeup School Sydney internal and third party representatives maintain compliance with a range of regulatory requirements when undertaking promotional activities.

Do Not Call Register

Makeup School Sydney representatives who make unsolicited contact with potential students in order to sell them course services comply with the *Do Not Call Register Act 2006* and associated telemarketing standards.

Third Party Representatives

Makeup School Sydney ensures that any third party agreements that include the making of telemarketing calls and marketing faxes require compliance with the Act.

Telemarketing and Research Calls Industry Standard

The Telemarketing and Research Calls Industry Standard applies to all voice calls made to Australian numbers that:

- Offer, advertise or promote goods, services, land, interests in land, business opportunities or investment opportunities;
- Advertise or promote suppliers or prospective suppliers of such things;
- Solicit donations; and
- Conduct opinion polling or standard survey-based research.

The industry standard establishes minimum requirements for those making telemarketing and research calls.

Permitted Contact Hours

Makeup School Sydney representatives do not undertake telephone or fax marketing to clients:

- On a Sunday or a public holiday;
- Before 9am or after 8pm on a weekday; or
- Before 9am or after 5pm on a Saturday.

Except in cases where consent has been given by the call recipient in advance to receive the call during the prohibited calling hours.

Provision of Information

Makeup School Sydney representatives making telemarketing calls, at the start of the call, provide their contact information, the name of the person or business that caused the call to be made and explain the purpose of the call.

On request, Makeup School Sydney representatives also provide:

- The source of the telephone number; and

- The name and contact details at Makeup School Sydney for dealing with consumer enquiries and complaints.

Providing for the termination of calls

Makeup School Sydney representatives will immediately terminate the call in a range of circumstances, including where the call recipient asks for the call to be terminated or otherwise indicates that he or she does not want the call to continue.

Requiring callers to enable calling line identification

Makeup School Sydney ensures that calling line identification is enabled at the time that the caller makes or attempts to make a call.

Provision of Information during Calls

Makeup School Sydney provides individuals with certain information when calls are conducted, as per the requirements of the Act. Exactly when the provision of information is needed differs, depending on whether it is a research call or other telemarketing call.

Telemarketing Calls	
Information that must be provided as soon as the call starts:	<ul style="list-style-type: none"> • The given name of the person calling; • The purpose of the call; and • If the telemarketing company is calling on behalf of another business, the name of that business.
Information that must be provided on request if applicable, but does not need to be provided if the consumer doesn't ask for it:	<ul style="list-style-type: none"> • The full name or staff ID of the person calling; • If the person is making the call as an employee of a company or business, the name and contact details of the person's employer; • If the person is not making the call as an employee of a company or business, their own full name or business name and contact details (details of a telephone number used principally for residential purposes are not required where the caller makes the calls from their residential address); • If the telemarketing company or business is calling on behalf of another business, the contact details of that business; • The name and contact details of the person responsible for dealing with inquiries and complaints about (as applicable): <ul style="list-style-type: none"> ○ The person making the call; ○ The telemarketing company or business they are calling from; and ○ The business on behalf of which the telemarketing company or business is calling.
Information that must be provided within a reasonable time frame (not exceeding 7 days) if the consumer asks for it:	<ul style="list-style-type: none"> • Where the person calling obtained the telephone number, or that it was from a private individual; • The name of the person the call was intended for (if applicable); and • The name and contact details of any organisation that provided the information to the person calling (if applicable).

Research Calls	
Information that must be provided as soon as the call starts:	<ul style="list-style-type: none"> • The given name of the person calling; and • The purpose of the call.
Information that must be provided on request or, if the consumer doesn't request it, before the end of the call:	<ul style="list-style-type: none"> • If the research company is calling on behalf of another business, the name of that business.
Information that must be provided on request if applicable, but does not need to be provided if the consumer doesn't ask for it:	<ul style="list-style-type: none"> • The full name or staff ID of the person calling; • If the person is making the call as an employee of a company or business, the name and contact details of the person's employer; • If the person is not making the call as an employee of a company or business, their own full name or business name and contact details (details of a telephone number used principally for residential purposes are not required where the caller makes the calls from their residential address); • If the research company or business is calling on behalf of another business, the contact details of that business; • The name and contact details of the person responsible for dealing with inquiries and complaints about (as applicable): <ul style="list-style-type: none"> ○ The person making the call; ○ The research company or business they are calling from; and ○ The business on behalf of which the research company or business is calling.
Information that must be provided within a reasonable time frame (not exceeding 7 days) if the consumer asks for it:	<ul style="list-style-type: none"> • Where the person calling obtained the telephone number, or that it was from a private individual; • The name of the person the call was intended for (if applicable); and • The name and contact details of any organisation that provided the information to the person calling (if applicable).

Fax Marketing Industry Standard

The *Fax Marketing Industry Standard 2011* sets rules about when and how fax marketing can occur. Specifically, it includes requirements for:

- When marketing faxes cannot be sent;
- Information that must be provided on a marketing fax;
- Providing an opt-out functionality; and
- Limiting the number of marketing faxes that can be sent to a number over a particular period.

The standard applies where fax marketing includes:

- Offer, advertise or promote goods or services, land or an interest in land, or a business or investment opportunity, or to promote a supplier or potential supplier of such goods or services;
- Solicit donations;
- Conduct opinion polling; or
- Carry out standard survey-based research.

Prohibited times for the sending of faxes

Makeup School Sydney does not send a marketing fax, or cause a marketing fax to be sent on:

- A weekday before 9.00 am or after 8.00 pm;
- A Saturday before 9.00 am or after 5.00 pm; or
- A Sunday or national public holiday.

The times set out above refer to the time of day at the fax recipient's usual residential address.

Information that must be provided on a marketing fax

AN Makeup School Sydney marketing fax includes the following information:

- Makeup School Sydney name and Australian Business Number (ABN);
- Contact details;
- The destination number that the fax is intended to be sent to; and
- The details of how the recipient can send an opt-out message including:
 - A statement to the effect that the fax recipient may opt out of receiving any future faxes from Makeup School Sydney by conveying an opt-out message to an opt-out address and
 - An opt-out address to which fax recipients can communicate an opt-out message.

The information required must be:

- Displayed in a clear and conspicuous manner;
- Included on the first page of the fax at a minimum; and
- Displayed using a minimum size 10 font.

Opt-out facility

A person can send to, leave at, or otherwise communicate an opt-out message to the opt-out address. Makeup School Sydney has in place processes to ensure that:

- The opt-out address provided in the fax is capable of receiving opt-out messages at all times; and
- It removes the fax recipients numbers from any list of Australian numbers used as soon as possible, and no later than seven days, after receiving an opt-out message.

Limit on number of faxes to be sent to a recipient in a period

Makeup School Sydney representatives make reasonable efforts to ensure that no more than one (1) fax that is authorised to be sent by the same fax advertiser is sent to a particular Australian number in any single 24 hour period.

Managing Call Lists

Makeup School Sydney submits calling lists to the register for washing through the Telemarketer Access Portal:

<https://www.donotcall.gov.au/dncrtelem/index.cfm>

Washed lists identify which numbers are:

- Registered, and therefore should not be called; and
- Not registered, and therefore may be called.

Makeup School Sydney relies on the validity of washing results for thirty (30) days from the date the register returns the washed list. Calling lists are kept in a valid 'washed' state by monitoring when the 30 day validity period of each list is about to lapse, and making sure that any numbers intended to be called after the end of the validity period are re-washed before the validity period ends.

Makeup School Sydney has clearly documented steps taken to ensure that numbers identified as being on the register are not called unlawfully, and that numbers identified as not being on the register are not called outside the 30 day validity period. Work instructions include:

- The process for preparing and washing lists;
- The timeframes within which key steps are to occur; and
- The process for rewashing unused numbers before the 30 day period expires.

The Makeup School Sydney National Sales Manager is responsible for the ongoing monitoring and maintenance of work instructions with all Makeup School Sydney representatives.

Campaign Records

Makeup School Sydney representatives maintain the following records for at least twelve (12) months:

Call Lists

- Washing receipts provided by the register operator for each washed list (among other things, the receipts include a unique transaction ID, time and date stamps, and a summary of the quantity of numbers submitted and returned); and
- Copies of all files submitted for washing (in the format in which they were submitted) and all files as returned by the register operator.

Call Records

For each telemarketing call made or attempted, Makeup School Sydney representative's record:

- The telephone number called;
- The date and time of the call;
- The length of the call;
- The outcome of the call (for example, answered or unanswered);
- The client, campaign or service (as appropriate) for which the call was made.

These records are maintained for all calls and attempted calls (that is, not just calls that give rise to an outcome, or the final attempt to a number before it is abandoned).

Campaign Records

For each campaign, Makeup School Sydney representative's record:

- Details of the services marketed by telemarketing calls (for example, call scripts, brochures, information sheets)
- The names, addresses, contact details and roles of all parties who were involved in making the calls or causing them to be made;
- The carriage RTOs who provided the outbound telephone service through which the calls were made
- If another person such as a contracted call centre or reseller made telemarketing calls under a telemarketing agreement, copies of all contracts and agreements relating to the making of telemarketing calls.

Records are stored in various Customer Relationship Management (CRM) recording systems relevant to each individual Makeup School Sydney representative entity.

Electronic Marketing

The *Spam Act 2003* prohibits the sending of unsolicited commercial electronic messages—known as spam—with an Australian link. A message has an Australian link if it originates or was commissioned in Australia, or originates overseas but was sent to an address accessed in Australia.

The *Spam Act 2003* defines a commercial electronic message as:

- Offers, advertises or promotes the supply of goods, services, land or business or investment opportunities;
- Advertises or promotes a supplier of goods, services, land or a provider of business or investment opportunities; or
- Helps a person dishonestly obtain property, commercial advantage or other gain from another person.

The Act classifies an electronic message as 'commercial' by considering:

- The content of the message;
- The way the message is presented; and
- Any links, phone numbers or contact information in the message that leads to content with a commercial purpose—as these may also lead the message to be defined as 'commercial' in nature.

Messages sent without consent

As an educational institution, Makeup School Sydney representatives can send messages to past and current students without their consent, but only if the messages relate to goods or services supplied by Makeup School Sydney.

Identification

All commercial electronic messages sent by Makeup School Sydney representatives accurately identify Makeup School Sydney as the organisation that authorised the sending of the message. Information provided includes:

- Clear and accurate information on the Makeup School Sydney XXXXXXXX that authorised the sending of the message — including the correct legal name of the organisation and an Australian Business Number; and
- Accurate information about how the recipient can contact Makeup School Sydney.

Makeup School Sydney ensures that this information remains correct and valid for at least 30 days after the message is sent.

Prospective Student Expressions of Interest & Registrations

All Makeup School Sydney promotional activities conducted by internal and third party representatives are aimed at providing initial general purpose information to prospective clients, in order to secure initial interest and/or a registration for further information.