



Marketing and Advertising Policy

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Related Policies and Documents

- Freedom of Speech and Academic Freedom Policy (E1E2.5)
- Information Disclosure Policy (C1.1)
- Complaints Handling Policy (C1.4)
- Social Media Guidelines (if applicable)
- OfS Regulatory Guidance: Freedom of Speech
- Advertising Standards Authority (ASA) Codes
- Consumer Protection Legislation (CMA Guidance)

Version History

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1.0	01/08/2023	Original version	Academic Board
2.0	15/09/2025	Policy aligned with OfS freedom of speech expectations	Governing Council



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Marketing and Advertising Policy

Section 1: Policy Summary

1. This policy sets out Mortha Halls of Ivy's approach to marketing, advertising, and public communication. It ensures that all representations of the institution are accurate, accessible, and compliant with relevant regulatory frameworks.
2. The policy applies to all forms of promotional activity, including digital media, print materials, open days, outreach events, and third-party communications. It also addresses how students, staff, and agents are involved in the preparation, approval, and delivery of marketing content.
3. MHI is committed to promoting its educational services in a transparent, inclusive, and professional manner that respects the rights of prospective and current students, upholds freedom of expression, and meets the expectations of the Competition and Markets Authority (CMA), the Advertising Standards Authority (ASA), and the Office for Students (OfS).
4. This policy supports compliance with OfS Conditions C1 and E1 and aligns with MHI's commitment to freedom of speech, student protection, and public interest governance.

Section 2: About This Policy

5. This policy outlines the principles, regulatory obligations, and operational procedures that govern how Mortha Halls of Ivy (MHI) promotes its educational services to prospective and current students, stakeholders, and the wider public.
6. It applies to all individuals and teams involved in marketing and communications activity on behalf of MHI, including staff, student ambassadors, agents, and third-party service providers.
7. The policy is structured in two integrated parts:
 - Part 1: Governance and Legal Standards for Marketing – sets out MHI's legal and regulatory obligations, internal oversight responsibilities, and guiding principles for marketing conduct.
 - Part 2: Operational Framework – provides guidance on marketing activities, digital communications, use of agents, and processes for monitoring, complaints, and improvement.
8. Both parts should be read together as a single policy. The document is reviewed annually and updated where necessary to reflect changes in legislation, regulatory guidance, or institutional strategy.



Section 3: Scope and Application

9. This policy applies to all marketing, advertising, and public communication activities carried out by Mortha Halls of Ivy (MHI), whether internally produced or developed in collaboration with third parties.

10. It covers:

- Prospectuses, brochures, websites, and other digital content;
- Social media activity and paid advertising;
- Printed and electronic promotional materials;
- Public statements and event publicity;
- Engagements with agents, consultants, and third-party promoters;
- Verbal representations made to prospective students.

11. The policy applies to all staff, student ambassadors, governors, contractors, and partners involved in promoting MHI's educational services. It also applies to the use of the MHI name, logo, and branding.

12. The policy is relevant across all levels and modes of study and applies equally to UK and international audiences, regardless of recruitment channel or location.

Part 1: Legal and Regulatory Compliance Framework

Section 4: Legal and Regulatory Framework

13. Mortha Halls of Ivy (MHI) ensures that all marketing and advertising activity complies with UK law and the expectations of key sector regulators. In particular, this policy supports compliance with the following frameworks:

- Consumer Protection Law, including the Consumer Protection from Unfair Trading Regulations 2008 and the Consumer Contracts (Information, Cancellation and Additional Charges) Regulations 2013. These laws require the institution to provide accurate, timely, and clear information to students at all stages of their engagement.
- The Competition and Markets Authority (CMA) guidance for higher education providers, which sets out expectations for pre-contract information, fairness in terms and conditions, and complaint resolution.
- Advertising Standards Authority (ASA) Codes, including the UK Code of Non-broadcast Advertising and Direct & Promotional Marketing (CAP Code), which ensure that marketing communications are legal, decent, honest, and truthful.
- Office for Students (OfS) Conditions C1 and E1, which require institutions to provide timely and accurate information to enable informed student choice and to uphold public interest governance principles, including integrity and transparency in communications.
- The Higher Education (Freedom of Speech) Act 2023, which protects lawful expression and ensures that the institution's communication practices do not unduly restrict the lawful expression of ideas, views, or opinions.

14. This policy works alongside other internal policies including the Freedom of Speech and Academic Freedom Policy, Equality and Diversity Policy, and Student Protection Plan.



Section 5: Institutional Commitments to Free and Fair Communication

15. Mortha Halls of Ivy (MHI) is committed to conducting all marketing and advertising activities in a manner that is:

- Accurate and honest: Information will not mislead by exaggeration, omission, or ambiguity.
- Transparent and timely: Students will be provided with clear and relevant information before they make decisions about applying, accepting offers, or enrolling.
- Accessible and inclusive: Marketing materials will be reviewed to ensure they reflect MHI's commitment to equality, diversity, and inclusion.
- Balanced and fair: Comparisons with other providers will be factual and respectful. Marketing will not undermine the reputation of others or imply guarantees that cannot be delivered.
- Consistent across platforms: Published information will be regularly reviewed to ensure consistency between the website, prospectuses, social media, and internal documents.

16. MHI will not publish or endorse any communication that misrepresents the institution, its programmes, its academic standing, or its partnerships. All materials must support informed decision-making and promote trust between the institution and its stakeholders.

17. The institution also affirms that the right to lawful freedom of expression extends to marketing and promotional contexts. MHI does not restrict lawful views or identities in its visual or written communications, and marketing will reflect the institution's academic values as well as its brand.



Section 6: Content Moderation and Freedom of Expression

18. Mortha Halls of Ivy (MHI) maintains a range of communication channels including social media platforms, institutional websites, student forums, and public-facing events. While these channels are moderated to uphold professionalism and safety, MHI remains committed to protecting lawful freedom of expression.

19. MHI may remove or restrict content on its platforms if it:

- Incites violence, hatred, or discrimination;
- Harasses or unlawfully targets individuals or groups;
- Contains defamatory or knowingly false information;
- Breaches legal or regulatory requirements (e.g. GDPR, copyright);
- Violates platform terms of use or institutional codes of conduct.

20. Moderation decisions will not be based on the political, religious, or philosophical viewpoint expressed — unless that content crosses legal thresholds. Users of MHI's platforms, including staff and students, are expected to model respectful disagreement and use institutional spaces constructively.

21. MHI distinguishes clearly between:

- Moderated official platforms, where institutional branding and responsibility apply; and
- Personal or non-affiliated platforms, where MHI has no jurisdiction unless legal or reputational risks arise.

22. Where content is removed or moderated, a record will be kept, and where appropriate, the affected individual will be informed of the reason. Appeals or concerns about moderation may be raised via the Complaints Handling Policy

23. Mortha Halls of Ivy affirms its commitment to lawful freedom of speech and academic freedom in all marketing and communications. The institution will not restrict, censor, or discourage lawful expression, even where views may be controversial or unpopular, provided they remain within the law.

24. Decisions on moderation will take into account the Freedom of Speech and Academic Freedom Policy, ensuring consistency across all institutional policies.

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Section 7: Roles and Governance Oversight

25. Responsibility for the integrity and compliance of marketing and advertising activity at Mortha Halls of Ivy (MHI) is shared across academic, administrative, and governance teams.

26. Key roles are defined as follows:

Governing Council

- Approves this policy and monitors its implementation as part of institutional governance.
- Receives periodic reports on marketing practices, risks, complaints, and regulatory compliance.
- Oversees alignment between MHI's public communications and its strategic direction and governance values.

Academic Registrar

- Acts as the institutional lead for marketing policy implementation.
- Ensures marketing practices meet legal and regulatory requirements, including consumer protection and OfS obligations.
- Coordinates periodic audits of published content and promotional material.
- Oversees handling of complaints, challenges, or corrections related to marketing.

Marketing and Finance Panel

- Advises on strategy, brand positioning, budget allocation, and digital presence.
- Reviews new campaigns and content for risk, accuracy, and inclusivity.
- Ensures that student feedback is considered in shaping communications.

All Staff, Student Ambassadors, and Contractors

- Are expected to uphold the principles of this policy in any promotional or public engagement capacity.
- Must refer all formal or published content to the appropriate approval route before public release.

27. Where institutional reputation, student understanding, or legal compliance may be at risk, the Academic Registrar has delegated authority to suspend or correct communications, pending review.



Section 8: Complaints and Escalation

28. Individuals who believe they have been misled by marketing or advertising materials issued by Mortha Halls of Ivy (MHI), or who wish to raise concerns about content accuracy or fairness, may do so through MHI's Complaints Handling Policy.

29. Complaints may relate to:

- Inaccurate or unclear information in prospectuses, on the website, or in public presentations;
- Unfair comparisons or misleading claims;
- Omission of key facts that affect student decision-making;
- Inappropriate imagery, tone, or representation;
- Concerns about biased or disproportionate moderation of user-generated content.

30. Complaints will be:

- Triaged by the Academic Registrar or nominee;
- Investigated in accordance with the institutional complaints process;
- Logged and tracked for reporting to the Governing Council where systemic issues are identified.

31. MHI is committed to resolving complaints in a timely, impartial, and transparent manner. Where marketing content is found to breach this policy or any regulatory requirement, the institution will take prompt corrective action and update affected materials.

32. Any concerns that moderation or marketing decisions have restricted lawful speech can be raised under the Complaints Handling Policy. These complaints will be treated confidentially and considered with specific reference to the principles of freedom of speech and academic freedom.

Part 2: Operational Framework

Section 9: Marketing Channels and Procedures

33. Mortha Halls of Ivy (MHI) uses a variety of channels to communicate with prospective and current students, stakeholders, and the wider public. These include:

- Print and digital prospectuses
- The institutional website
- Email campaigns and newsletters
- Social media platforms
- Events, open days, and recruitment fairs
- Third-party listings and advertising platforms
- Verbal or visual presentations delivered by staff or ambassadors

Marketing Approval and Review

- All externally published marketing content must be approved by the Marketing and Finance Panel or by a delegated lead authorised by the Academic Registrar.
- Final approval must be granted before any publication, broadcast, or promotional activity is released to the public.
- Marketing materials are reviewed periodically for accuracy, accessibility, and brand consistency. Outdated or misleading content is corrected or withdrawn promptly.

Use of Claims and Statistics

- Any statistical claim, ranking, or comparison must be supported by evidence and clearly dated.
- Where quotes or testimonials are used, consent must be obtained, and the source must be traceable on request.
- Use of league tables or national performance data must reference the source and methodology, avoiding selective or misleading presentation.

Inclusive and Accessible Language

- MHI reviews marketing content to ensure it reflects the institution's values of inclusion, fairness, and respect for diversity.
- Language, imagery, and tone are monitored to ensure they are welcoming, culturally sensitive, and appropriate for a diverse audience.

Section 10: Use of Website and Social Media

34. Mortha Halls of Ivy (MHI)'s website and social media accounts are important tools for engaging with prospective students, partners, and the public. These platforms are managed centrally to ensure accuracy, consistency, and compliance with regulatory obligations.

Website Management

- The institutional website is the primary source of official course information, policy documents, and key institutional communications.
- The content team, under the Academic Registrar's oversight, is responsible for maintaining up-to-date programme details, fee structures, admissions information, and policies.
- The website is reviewed regularly to ensure that information provided to students remains accurate and consistent with approved documents.

Social Media Governance

- Official MHI social media accounts are maintained by designated staff, with oversight from the Marketing and Finance Panel.
- Posts must reflect the institution's values and comply with relevant laws, including data protection and advertising standards.
- Where third-party platforms host reviews or comments, MHI may respond but does not remove content unless it violates platform rules or UK law.

Moderation and Response

- Moderation of social media is conducted to ensure that comments do not breach the law or MHI's codes of conduct.
- MHI may remove posts or block users only where content is:
 - Defamatory or false;
 - Threatening, discriminatory, or abusive;
 - Spam or commercial promotion not affiliated with MHI;
 - Misleading or impersonating MHI representatives.
- Users will not be censored or blocked based solely on their opinions, provided their contributions remain lawful. Concerns about moderation may be raised through the institutional complaints process.

Section 11: Internal Communication and Consent

35. Mortha Halls of Ivy (MHI) recognises the importance of consent, privacy, and transparency in all internal communications that involve the use of individual data, identity, or contributions for promotional purposes.

Student and Staff Consent

- MHI obtains informed consent from any student or staff member whose name, image, testimonial, or personal story is used in promotional content.
- Consent must be freely given, specific, informed, and documented. Individuals may withdraw consent at any time, and content will be removed or revised accordingly.
- Consent is also required before recording student or staff participation in marketing campaigns, videos, or case studies.

Use of Testimonials and Quotes

- Testimonials must accurately represent the views of the individual and reflect their authentic experience at MHI.
- Where testimonials are edited for clarity or space, the meaning must not be changed or distorted.
- Anonymous or composite quotes may only be used if this is clearly stated and ethically justified.

Internal Briefings and Brand Use

- Staff must refer to the institutional Brand Guidelines before using the MHI name, logo, or identity in communications.
- Internal communications used for promotional purposes (e.g. campus notices, classroom materials shared online) must not be repurposed for external marketing without approval.
- The Academic Registrar is responsible for overseeing the consent process, in collaboration with the Data Protection Officer.

Section 12: Oversight by the Marketing and Finance Panel

36. The Marketing and Finance Panel is a standing advisory group within Mortha Halls of Ivy (MHI)'s governance structure. It supports the effective planning, approval, and monitoring of marketing and advertising activity.

Purpose and Function

37. The Panel's core functions are to:

- Review and approve marketing campaigns, key publications, and branding initiatives;
- Provide advice on institutional messaging, outreach strategy, and audience targeting;
- Monitor compliance with this policy, CMA guidance, and related regulatory frameworks;
- Advise on budgetary allocations for marketing and communications;
- Ensure marketing activities are aligned with institutional strategy, values, and equality commitments.

Membership

38. The Panel is chaired by the Academic Registrar and includes representatives from:

- Academic leadership;
- Admissions and student recruitment;
- Finance and business development;
- Student engagement and communications;
- External consultants or advisors, where appropriate.

39. The Panel meets regularly and may convene ad hoc meetings to respond to reputational risks or urgent compliance matters. Decisions and actions are reported to the Governing Council as part of institutional oversight.

40. The Governing Council will receive an annual report on the handling of marketing-related complaints and moderation actions, including how decisions have supported transparency, freedom of speech, and compliance with OfS conditions.



Section 13: Use of Agents and Third Parties

41. Mortha Halls of Ivy (MHI) may engage agents, consultants, or third-party providers to support its marketing, recruitment, or public relations activities. All such arrangements must reflect the institution's commitment to lawful, ethical, and accurate communication.

Selection and Contracting

- Third parties must be vetted and formally contracted before being authorised to act on MHI's behalf.
- Contracts must include clauses that:
 - Require compliance with consumer protection law and ASA standards;
 - Prohibit misleading or unauthorised claims;
 - Require use of approved messaging, materials, and data handling procedures;
 - Specify expectations for student interactions, follow-up, and reporting.

Monitoring and Accountability

- MHI monitors the performance and conduct of agents and third parties through periodic audits and student feedback.
- The Academic Registrar retains the right to suspend or terminate any arrangement where there is evidence of non-compliance or reputational risk.

Branding and Representation

- Agents may only use MHI's name, logo, and promotional materials with express permission.
 - All public representations made by third parties must reflect the same standards of honesty, clarity, and respect outlined in this policy.
42. Agents found to have breached these requirements may be removed from approved listings, and corrective communications may be issued where necessary.



Section 14: Monitoring and Continuous Improvement

43. Mortha Halls of Ivy (MHI) is committed to ensuring that all marketing and advertising activity remains lawful, accurate, student-focused, and aligned with the institution's values.

Monitoring Activities

44. The Academic Registrar coordinates regular monitoring to:

- Review the accuracy and clarity of published materials;
- Check for consistency across platforms and communications;
- Ensure that outdated content is promptly corrected or withdrawn;
- Evaluate the tone, imagery, and inclusiveness of content;
- Identify and address any systemic complaints or reputational risks.

45. Monitoring may include:

- Internal reviews and staff spot-checks;
- Student surveys and feedback forms;
- Input from the Marketing and Finance Panel;
- Oversight by the Governing Council and relevant subcommittees.

Continuous Improvement

- Lessons learned from complaints, regulatory updates, or internal audits will be used to improve marketing practices.
- This policy is reviewed annually and updated to reflect legal changes, sector guidance, or institutional priorities.
- Staff involved in marketing, recruitment, or public communications receive regular training and updates on policy developments and best practice.

46. The outcomes of policy reviews and monitoring activity are included in annual reports to the Governing Council.

Section 15: Minimum Information Standards

47. Mortha Halls of Ivy (MHI) ensures that all prospective students are provided with timely, accurate, and accessible information to support informed decision-making.

48. The following categories of information must be clearly available before a prospective student:

- Applies to a course;
- Accepts an offer; or
- Enrols with the institution.

Core Information Requirements

- Full course title and qualification level
- Entry requirements and application process
- Course content, structure, and mode of delivery
- Tuition fees and any additional mandatory costs
- Location of delivery and awarding body (if applicable)
- Methods of assessment
- Accreditation or recognition of qualifications
- Support services and learning resources
- Terms and conditions of enrolment
- Complaints and appeals process

49. This information must be:

- Consistent across all platforms (website, prospectus, agents);
- Kept up to date and reviewed regularly;
- Written in plain English and accessible formats.

50. Any substantial change to the above information - especially after a student has accepted an offer - must be communicated promptly, with options for students to withdraw or transfer where appropriate.