# Advertising Policy

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### SCOPE

 This policy is to support internal and external customers with guidance when advertising products and services with Smart Awards. This Smart Awards policy, unless otherwise apparent from the context, includes advertising on the Smart Awards website and any of its assets. This policy maps to Ofqual general conditions and SQA Accreditation principles.

## OFQUAL GENERAL CONDITIONS

- 2. B5.2: An awarding organisation must not (and must take all reasonable steps to ensure that any person connected with it does not) make any statement that would be likely to lead Users of qualifications to believe that a qualification it makes available is a regulated qualification when it is not a regulated qualification.
- 3. B5.2: An awarding organisation must not (and must take all reasonable steps to ensure that any person connected with it does not) advertise or promote its qualifications in a manner that is likely to be misleading to Users of qualifications.
- 4. E2.3; An awarding organisation must ensure that each qualification which it makes available, or proposes to make available, has a title which it uses consistently in its advertising and in its communications with Users of qualifications.

# SQA ACCREDITATION PRINCIPLES

5. Principle 2: The awarding body shall ensure it has the necessary resources to effectively carry out its operational functions to meet regulatory requirements.

### RESPONSIBILITIES

6. This is policy is for qualifications offered by Smart Awards. This policy is for centres accessing Smart Awards qualifications and related services and all those involved with the delivery and quality assurance of Smart Awards qualifications. Smart Awards has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. Smart Awards has the day-to-day responsibility for implementing this policy and for monitoring its use and effectiveness and dealing with any queries on its interpretation.

R	Responsibilities		The person who actually carries out the process or task. The person is responsible for action/implementation. Responsibilities can be shared										
A	Accountabilities	decisior	The person who is ultimately accountable for the process or task being completed and who has the authority to make decisions, yes or no authority and veto power. Responsible person (s) are accountable to this person. Only one A can be assigned to a task										
С	Consulted		The person to be consulted prior to a final decision or action (two-way communication). People who are not directly involved with carrying out the task but are consulted with.										
I	Informed		Anyone whose work depends on the process or task and who has to be updated about the progress after a decision or action has been taken (one-way communication).										
POLI	CY	BOARD	CEO	MD	OPS	QUALITY	STANDARDS	QUAL	IT	FINANCE	EQA	NOPS	CENTRES
					DIRECTOR	PORTFOLIO MANAGER	COMPLIANCE OFFICER	ADMIN OFFICER	CONSULT	AUDITOR		BOARD	
Awarding Policies and Process													

Advertising	А	R	R	R	R	R	С	I	I	Ι	I	R
ASSOCIATED POLICIES												
Complaints												
Holiday/Sickness Cover												
The MD, CEO and Operations Director cover holiday/sickness and absenteeism for areas where the person is responsible for action/implementation of a task. The MD. CEO and Operations Director hold company wide experience to be able to carry out these tasks and hold no conflicts of interest.												

# GENERAL APPROACH

- 7. Smart Awards is looking to maximise revenue from advertising and therefore, wherever possible, will permit advertising. Acceptance of any advertisement does not imply endorsement of any particular products or offers or that Smart Awards is responsible for their quality and reliability. Smart Awards accepts no liability for any loss or damage arising out of or in connection to any advertisement.
- 8. Smart Awards reserves the right to refuse any individual advertisement or endorsement not deemed appropriate without explanation and can remove any advertisement immediately, if Smart Awards deems it reasonable to do so.

### PROHIBITED PRODUCTS, SERVICES

- 9. All centres must comply with controls put in place by the ASA (Advertising Standards Authority) which is an independent body set up by the advertising industry to police the rules laid down in advertising codes. The ASA works to ensure that all advertisements are legal, decent, honest and truthful.
- 10. As Smart Awards wishes to promote the use of its products and services within our customer's business's, web advertising space will normally only be provided for approved centres.

### STYLE AND CONTENT OF ADVERTISING

- 11. Smart Awards has an open approach to styles of advertising. Centres must not mislead by advertising an unregulated qualification that implies it's a regulated qualification. Centres must recognise awarding organisations cannot permit advertising which could reasonably be construed as being either:
  - directly or indirectly sexual in nature and/or which features partial or complete nudity and/or which appears to promote or give undue publicity to illegal or inappropriate behaviour or lifestyles.
  - Special or political material which is contentious or which conflicts with the Smart Awards policies, values or statutory obligations (for example, equalities legislation)
- 12. Smart Awards will approach apparent humour in submitted advertising with the utmost caution since humour can sometimes directly or indirectly be seen as mocking specific groups of citizens or potentially poking fun at particular types of individuals or their behaviour or in relation to various situations. However, Smart Awards will permit 'innocent humour', providing Smart Awards considers there is no likely innuendo or subtext which might cause offence.
- 13. Where an image or text is used that make any individual(s) regognisable, consent must be obtained from those individuals who must also understand that they may withdraw their consent at any time.

- 14. Advertising which Smart Awards deems to be critical of Smart Awards, its products and services or its staff and partners will not be permitted. Smart Awards logo shall not be incorporated into any advertisement without the prior written consent of Smart Awards. It is the responsibility of the centre to check the correctness of their advertisement before it is uploaded to any external websites.
- 15. Each year at centre re-registration, Smart Awards will check the centres website for correct use of our logo and wording associated with the provision your centre is registered to deliver.
- 16. Regulated and Non-Regulated Provision. Smart Awards take all reasonable steps to ensure that advertisement or promotion of its qualifications is not misleading to users of qualifications. Definitions are shown below.
- 17. When advertising unregulated courses you can use wording that is appropriate to your centre but must make it clear to leaners and/or potential user that they are not recognised qualifications regulated by qualification regulators.



- 18. Centres must ensure that any advertising by third parties is consistent with and also follows the stipulations outlined in this document.
- 19. Centres should email proofs of any promotional material that references Smart Awards before publishing.
- 20. Centres must refer to Smart Awards qualifications using their full title. This includes marketing and in communication with learners.
- 21. It is essential that the master file of the logo is always used. Do not lift low-resolution versions from other documents or websites and never redraw our logo.
- 22. All centres are provided with a high-resolution version of our logo on approval; to request a copy please contact the <u>info@smartawards.co.uk</u>

- The logo should be kept in proportion and not stretched
- Do not rotate the UAL Awarding Body logo
- Do not rearrange the order of the logo
- Do not display the logo in a different colour
- Do not use the logo over imagery which does not offer a high contrast
- Do not use imagery within our logos

### **REVIEW OF THIS POLICY**

23. This policy is reviewed and revised annually in response to feedback, changes in legislation and guidance from the regulators, SQA Accreditation or Ofqual.

#### PROCESS FOR CENTRE ADVERTISEMENT

Process Step Description	Process	Person Responsibility	Organisation Responsibility		
Submit marketing brief for approval	Process	Centre Manager	Centre		
Review marketing content	Process	MD	Smart Awards		
Approve or do not approve	Decision	MD holds responsibility for	Smart Awards		
marketing content		making corporate decisions			
Communicate outcome to centre	Process	MD	Smart Awards		
Review centre website annually	Process	EQA	Smart Awards		
Stop	End	MD	Smart Awards		