



Procedure

Advertising

Version effective: 22/03/2021

Version: 1.6

Audience

Department-wide including regions and all state schools.

Purpose

The purpose of this procedure is to ensure that all advertising by schools and corporate units of the Department of Education (the department) is undertaken in an open, transparent, fair and responsible manner.

Overview

The key principles underpinning advertising advice are based on:

- ensuring all arrangements are consistent with the [Queensland Government Advertising and Marketing Communication Code of Conduct](#)
- alignment with the [Queensland Government advertising guidelines](#) (Qld govt employees only)
- appropriate authorisation
- ethical behaviour and fair dealing
- effective management and reporting
- value for money
- effectiveness.

Responsibilities

School principals

- approve all school advertising proposals
- ensure all arrangements are consistent with the [Queensland Government Advertising and Marketing Communication Code of Conduct](#) and [Queensland Government advertising guidelines](#) (Qld Govt employees only) ensure all external advertising bookings (newspapers etc.) are made through the Queensland Government Master Media provider – [MediaCom](#)
- ensure familiarity and compliance with unacceptable advertising (see definitions)
- ensure familiarity and compliance with the political advertising in schools protocol (see definitions)



- ensure behaviour of any final arrangement would withstand critical public scrutiny when negotiating advertising
- should avoid advertising goods or services of organisations that are in direct competition to suppliers the school has contracts with
- consult [Strategic Communication and Engagement \(SCE\)](#) (DoE employees only) for advice as required.

Parents and Citizens' Associations

- refer proposals and arrangements to your school principal for approval
- use the [advertising checklist](#) to help assess suitability of advertising proposals
- ensure behaviour or any final arrangement could withstand critical public scrutiny when arranging advertising.

Regional Directors

- approve all non-school based advertising proposals in their region
- refer all non-school based advertising requests and communication activities (including mailouts, handouts and brochures) to SCE for advice
- ensure all arrangements are consistent with the [Queensland Government Advertising and Marketing Communication Code of Conduct](#) and [Queensland Government advertising guidelines](#) (Qld Govt employees only)
- ensure all bookings are made through the Queensland Government Master Media provider (non-campaign) – [MediaCom](#)
- ensure familiarity and compliance with unacceptable advertising (see definitions).

Departmental officers who are not directors

- refer all advertising enquiries to your director for advice.

Directors, Executive Directors, Assistant Directors-General and Deputy Directors-General

- refer all advertising plans and major communication activities worth more than \$20,000 to SCE for advice and referral to the [Government and Advertising Communication Committee \(GACC\)](#) (Qld Govt employees only) for approval (activity cannot be broken into segments to go under this threshold)
- ensure familiarity and compliance with unacceptable advertising (see definitions)
- approve the publication of advertisements via the [Approval to Publish](#) (DoE employees only) process prior to dispatch.

Executive Director, Strategic Communication and Engagement

- approve advertising campaigns in line with the Queensland Government process
- facilitate approval from GACC as required
- advise principals, central office directors or regional directors, and relevant delegates of the outcome of proposals submitted for advice/approval
- approve advertisements via the [Approval to Publish](#) (DoE employees only) process.



Director-General, Department of Education

- approve advertising campaigns in line with the Queensland Government process
- approve final creative for advertisements via the [Approval to Publish](#) (DoE employees only) process.

Process

School staff

- refer all advertising approvals to your principal.

School principals

Step 1 – Assess suitability of advertising proposal

- use the [Advertising checklist for schools and Parents and Citizens' Associations](#) to help assess suitability of advertising proposals
- ensure all arrangements are consistent with the [Queensland Government Advertising and Marketing Communication Code of Conduct](#) and consult SCE for advice regarding any significant or potentially controversial advertising arrangements
- ensure all bookings are made through the Queensland Government Master Media provider – [MediaCom](#)
- ensure all advertisements are placed in the approved template, provided by MediaCom
- ensure familiarity and compliance with unacceptable advertising (see definitions)
- ensure familiarity and compliance with the political advertising in schools protocols (see definitions)
- ensure behaviour of any final arrangement would withstand critical public scrutiny when negotiating advertising.

Step 2 – Approve advertisement

- approve advertisement
- refer any questions to [SCE](#) for advice.

Step 3 – Book advertisement

- ensure all bookings are made through the Queensland Government Master Media provider – [MediaCom](#)
- ensure all advertisements are placed in the approved template, provided by MediaCom.

Parents and Citizens' Associations

Step 1 – Assess suitability of advertising proposal

- use the [Advertising checklist for schools and Parents and Citizens' Associations](#) to help assess suitability of advertising proposals
- ensure behaviour or any final arrangement could withstand critical public scrutiny when arranging advertising.



Step 2 – Refer advertising proposal

- refer proposals and arrangements to your school principal for approval.

Regional Directors**Step 1 – Assess suitability of advertising proposal**

- refer all non-school advertising requests and communication activities (including mailouts, handouts and brochures) to SCE for advice
- ensure all arrangements are consistent with the [Queensland Government Advertising and Marketing Communication Code of Conduct](#)
- ensure familiarity and compliance with unacceptable advertising (see definitions).

Step 2 – Approve advertisement

- approve advertisement.

Step 3 – Book advertisement

- ensure all advertising bookings are made through the Queensland Government Master Media provider (non-campaign) – [MediaCom](#).

Departmental officers who are not directors

- refer all advertising enquiries to your director for advice.

Directors, Executive Directors, Assistant Directors-General and Deputy Directors-General**Step 1 – Assess suitability of advertising proposal**

- ensure familiarity and compliance with unacceptable advertising (see definitions)
- refer all advertising plans and major communication activities worth more than \$20,000 to SCE for advice and referral to the [GACC](#) (Qld Govt employees only) for approval (activity cannot be broken into segments to go under this threshold).

Step 2 – Approve and publish advertisement

- ensure all advertisements are approved via the [Approval to Publish](#) (DoE employees) process prior to dispatch.

Executive Director, Strategic Communication and Engagement**Step 1 – Assess suitability of advertising proposal**

- consider and assess forwarded advertising enquiries
- advise principals, central office directors or regional directors, and relevant delegates, the outcome of all proposals submitted for advice/approval.



Step 2 – Approve and publish advertisement


- seek approval from the GACC for all advertising plans and major communication activities worth more than \$20,000
- approve the publication of advertisements via the [Approval to Publish](#) (DoE employees) process.

Director-General, Department of Education

- approve significant advertising campaigns in line with the Queensland Government process
- approve final creative for advertisements via the [Approval to Publish](#) (DoE employees only) process.

Definitions

Term	Definition
Advertising	Advertising may be incoming, e.g. where a local business pays to advertise in a communication device managed by the department, or outgoing, e.g. where the department pays to place an advertisement in the external media. See campaign advertising and non-campaign / recruitment advertising.
Appropriate association	Refers to ensuring advertising activity is with media outlets and advertisers whose public image and products or services are compatible with the ethos of public education.
Political advertising in schools protocol	<p>Advertisements that provide the contact details for local, state and federal elected members are permissible in schools.</p> <p>All elected member advertisements and signage must be provided with the following authorisation statement so they can be run at all times of the year including during local, state and federal elections. Section 328(1) of the <i>Commonwealth Electoral Act 1918</i> (Cwlth) (the Act) requires the name and address of the individual who authorised the electoral advertisement.</p> <p>Authorisation Statement example: 'Authorised J. Smith, 123 Smith St, Smithfield, QLD 2222.' (see the samples below).</p> <p>Advertisements that do not contain this authorisation must be removed during local, state and federal election periods, otherwise the school may be in breach of the Act and liable for a financial penalty from the Electoral Commission.</p> <p>Advertisements should also be clearly labelled with Advertisement (in a font no smaller than 10 point) at the top.</p> <p>Both advertisements and signage must not contain political messages, campaign slogans (e.g. Standing up for the community or Working hard for this school) or political party logos.</p> <p>NOTE: This protocol does not apply on election day when schools are used as a polling station.</p>

	<p>EXAMPLE ADVERTISEMENT:</p> <div style="display: flex; align-items: center;"> <div style="border: 1px solid black; padding: 5px; text-align: center;"> <p style="font-size: small;">Advertisement</p>  </div> <div style="margin-left: 10px;"> <p>☐ Mandatory</p> <p>☐ Mandatory</p> <p>☐ Contact details</p> <p>☐ Mandatory</p> </div> </div>
<p>Campaign advertising</p>	<p>Is developed to raise awareness, educate and generate positive attitudinal and behavioural changes in relation to services, products, projects, laws or policies. It is generally long-term in duration but can include short, intense bursts of media activity on a particular matter.</p> <p>Campaign advertising generally involves substantial strategic planning and creative development, and sophisticated evaluation of the creative concept, media exposure and outcomes.</p> <p>Campaign advertising can appear in any medium or a combination of media.</p>
<p>Non-campaign/recruitment advertising</p>	<p>Generally informational in nature, developed to fulfil immediate or short-term needs of clients – that is, it supports the basic administrative aspects of business. School advertisements promoting courses or attendance to events or activities are classified as non-campaign advertising.</p> <p>Non-campaign advertising includes:</p> <ul style="list-style-type: none"> • recruitment opportunities • educational courses and enrolment information • auctions or sales of goods or property • tenders and expressions of interest for goods and services • public, legal and statutory notices (for example, public meetings, consultation opportunities) • emergency notices (for example, power supply disruptions, road closures) • general announcements • special notices (for example, grants, fellowships) • special announcements (for example, electoral notices). <p>The Queensland Governments Master Media agency, MediaCom has pre-approved advertising templates for school- based advertisements. All non-campaign advertising must be booked through MediaCom.</p>

Commercial billboard advertising	Commercial billboard advertising greater than four square metres is not permissible at Queensland state schools. The only exception is existing billboards already erected at individual sites prior to the implementation of this procedure.
Core funding	Money provided by the department or government for day-to-day operation of schools and delivery of budgeted services. Advertising revenue received should be used to value-add to this existing funding, but not replace it.
Endorsement	<p>Involves any activities that could create a public perception that a school, other departmental unit or staff member is promoting or recommending an external organisation.</p> <p>Departmental units (including schools) that offer outgoing advertising opportunities via newsletters or other communication devices must ensure that all advertising arrangements are transparent, open to all acceptable organisations and do not directly suggest or imply endorsement of third parties.</p> <p>For example, endorsement includes:</p> <ul style="list-style-type: none"> • schools sending a letter to parents recommending or promoting a company's products or services. • advertising or promoting businesses or offers that involve the school or departmental unit receiving goods, incentives or commissions for sales of goods, loans, mortgages, insurance, real estate or other high risk products. <p>Contact Strategic Communication and Engagement (SCE) for further advice.</p>
Goods and Services Tax (GST)	When determining value for money for advertising arrangements, be aware that such arrangements may have GST implications and that revenue from an arrangement should meet any GST liability. The department's Corporate Taxation Unit can provide advice on GST. In addition, Executive Director, SCE, can provide advice on determining market value.
Government and Advertising Communication Committee (GACC)	<p>The GACC (Qld Govt employees only) has been established by the Department of the Premier and Cabinet to ensure:</p> <ul style="list-style-type: none"> • good governance with communication aligned to government priorities • effective strategies that are evidence based and offer value for money • campaign messages are coordinated and are in market at appropriate times • communication activity synergies are maximised • communication is coordinated, targeted and responsive to the diverse needs of the public • advertising adheres to the Queensland Government Advertising and Marketing Communication Code of Conduct and other relevant communication policies • evaluation and final expenditure is reviewed following the campaign • overall departmental advertising expenditure is monitored.



	<p>GACC will review:</p> <ul style="list-style-type: none"> • campaign activity with a spend greater than \$50,000 excl. GST — campaign spend should include all costs associated with the development and deployment of a campaign including media placement, creative development, events, PR, research, print and production, digital assets such as apps and websites • television and/or cinema advertising, including community service announcements • communication on significant projects, programs and initiatives • major community engagement activities • statewide direct mail and/or inserts • full-page advertising in major metropolitan newspapers. <p>GACC will note:</p> <ul style="list-style-type: none"> • low spend campaigns with a spend greater than \$20,000 excl. GST or which could be considered controversial or sensitive by the public • minor updates to existing campaigns.
Personal information	<p>Personal information means information or an opinion, whether true or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. This includes, but is not limited to name, telephone number of home address of students, parents or staff.</p>
Food and drinks of minimal nutritional value	<p>Any advertising arrangements in state schools should be consistent with the Smart Choices - Healthy Food and Drink Supply Strategy for Queensland Schools. This includes advertising arrangements which involve direct access to food or drinks, the use of vouchers to promote food or drinks, and images, names or logos synonymous with the sale of food or drinks of minimal nutritional value. When considering advertising proposals involving food or drinks, schools should act cautiously and consider the guiding principles for applying Smart Choices in the school environment as outlined in the document Smart Choices@school events.</p>
Signage advertising	<p>Signage advertising includes posters, placards, notices, signs, fence signage and an advertising structure to which such advertising is affixed to, painted on, or supported by.</p>
Unacceptable advertising	<ul style="list-style-type: none"> • is contrary to the political advertising and signage in schools protocol • involves departmental endorsement or perceived endorsement of commercial products, services or third parties • promotes, contains, undermines or disparages religious views or beliefs • is religious in nature, noting that information about chaplaincy or student welfare worker events or activities should be presented as editorial content, rather than advertising, and should adhere with the Chaplaincy and student welfare worker services – guidelines for schools



- involves advertising arrangements where the school or departmental unit receives a commission or incentive for sold items
- is contrary to the ethos, values and purpose of the department
- is discriminatory, obscene or degrading
- incites people to commit illegal acts or violate school rules
- promotes tobacco products, alcohol, drugs, sex industry, gaming and gambling
- **Note:** Organisations that receive grants or donations derived from gambling industry, such as Gambling Community Benefit Fund, are acceptable.
- promotes or condones alcohol consumption or drink driving
- portrays violence, undue aggression, and menacing or horrific elements likely to disturb children and young people or likely to disturb people in general
- uses sexual overtones to advertise products or services
- is otherwise objectionable or offensive
- involves a commercial advertiser who could reasonably be seen to diminish public confidence in a school, the department or government acting in the public interest
- conflicts with the core business of the department
- is targeted at students and/or made available on student lesson pages available on departmental or school intranet sites
- is not consistent with any existing policies of the department or Queensland Government
- conflicts with events and initiatives of the Queensland Government
- involves students providing personal information in order to access services provided by a company
- compromises privacy including providing personal information about students, parents/guardians, staff or other members of school community to any organisation not authorised to access this information
- includes an unsolicited offer of a gift or benefit, where benefit will only be accrued upon indirect supply of contact details of students, their parents or guardians
- promotes food or drinks that are not aligned with the intent of the [Smart Choices - Healthy Food and Drink Supply Strategy for Queensland Schools](#), including those items which are classified as 'red' under the strategy.



Legislation

- Nil

Delegations/Authorisations

- [Advertising - Government and Advertising Communication Committee \(GACC\) process](#) (Qld Govt employees only)

Related policies

- [Queensland Government Advertising and Marketing Communication Code of Conduct](#)

Related procedures

- Nil

Supporting information

- [Advertising checklist for schools and Parents and Citizens' Associations](#)
- [Media buying and planning – Marketing Matters](#) (Qld govt employees only)

Contact

For further information, please contact:

Strategic Communication and Engagement

Phone: (07) 3328 6601

Please address inquiries about contracts in the first instance to the above contacts. The above contacts can then liaise with the Legal and Administrative Law Branch.

Review date

23/12/2018

Superseded versions

Previous seven years shown. Minor version updates not included.

1.0 Advertising

Creative Commons Licence

