



COMMUNITY  
COLLEGES  
AUSTRALIA



# RTO Marketing and Naming

Submission by

Community Colleges Australia

To the Australian Skills Quality Authority  
(ASQA)

14 October 2016



*CCA expresses high concern with respect to:*

## **1. The choice of names that are currently allowed for private RTOs.**

See the Appendix pages of this document for details of a number of RTOs that have potentially misleading names. CCA is particularly concerned with the use of the words “community”, “Australia”, “Australian”, “Aboriginal”, “Indigenous” and other means whereby words are placed together to imply that the RTO is either a not-for-profit community-owned and managed RTO or a TAFE college. CCA believes that certain words in RTO naming should be “restricted”.

## **2. The lack of transparency of a large number of RTOs regarding their ownership and management**

ASQA regulations (see following two pages) do not appear to require any specific details regarding ownership structures. CCA has great concerns that many RTOs pretend to be community-based through this lack of transparency. A large majority of the websites of RTOs that CCA has examined do not include details of:

- Who owns the RTO, including any company directors
- Where the owner/s are domiciled
- Who the key staff are, and their qualifications

Given the low respect that the Australian VET sector now holds in Australia – in part because of VET FEE-HELP malpractices and the collapse of some private providers – CCA believes that now is the time to:

- Commence a review of the proper naming of RTOs in Australia
- Develop proper advertising and promotion guidelines that require certain minimum standards of business transparency.



# RTO Marketing and Naming



The *ASQA Standards for Registered Training Organisations (RTOs) 2015* states:

- The RTO is ultimately responsible for ensuring transparent and accurate information about RTO services and performance is accessible to prospective and current learners and clients of the RTO, regardless of any arrangements to have this information distributed on behalf of the RTO.
- Transparent and accurate information about RTO services and performance enables prospective and current learners and clients to make informed decisions regarding their training and/or assessment needs.
- The information about RTO services and performance provided by the RTO must be relevant to and reflect the needs of the client which will vary from RTO to RTO.

See <https://www.legislation.gov.au/Details/F2014L01377>.



# RTO Marketing and Naming



## To be compliant with Standard 4 the RTO must meet the following:

4.1. Information, whether disseminated directly by the RTO or on its behalf, is both accurate and factual, and:

- a) accurately represents the services it provides and the training products on its scope of registration;
- b) includes its RTO Code;
- c) refers to another person or organisation in its marketing material only if the consent of that person or organisation has been obtained;
- d) uses the NRT Logo only in accordance with the conditions of use specified in Schedule 4;
- e) makes clear where a third party is recruiting prospective learners for the RTO on its behalf;
- f) distinguishes where it is delivering training and assessment on behalf of another RTO or where training and assessment is being delivered on its behalf by a third party;
- g) distinguishes between nationally recognised training and assessment leading to the issuance of AQF certification documentation from any other training or assessment delivered by the RTO;
- h) includes the code and title of any training product, as published on the National Register, referred to in that information;
- i) only advertises or markets a non-current training product while it remains on the RTO's scope of registration;
- j) only advertises or markets that a training product it delivers will enable learners 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;
- k) includes details about any VET FEE-HELP, government funded subsidy or other financial support arrangements associated with the RTO's provision of training and assessment; and
- l) does not guarantee that:
  - i) a learner will successfully complete a training product on its scope of registration; or
  - ii) a training product can be completed in a manner which does not meet the requirements of Clause 1.1 and 1.2; or
  - iii) a learner will obtain a particular employment outcome where this is outside the control of the RTO.



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# RTO Marketing and Naming



In September 2013, ASQA published its report entitled Marketing and advertising practices of Australia's registered training organisations (see [http://www.asqa.gov.au/verve/resources/Strategic Reviews 2013 Marketing and Advertising Report .pdf](http://www.asqa.gov.au/verve/resources/Strategic%20Reviews%202013%20Marketing%20and%20Advertising%20Report.pdf)).

Key Messages of that report (p. iii) were:

- Marketing practices of up to half of registered training organisations are potentially misleading to consumers
- Some marketing is also in breach of the national standards governing registered training organisations
- Organisations that are not registered training organisations are acting as brokers, with such arrangements potentially misleading consumers
- The national training standards relating to consumer protection need to be strengthened

*CCA believes that it is time to re-examine the outcomes of this report and subsequent actions. CCA requests ASQA and the Australian Government to commence a systematic review of how for-profit RTOs market themselves (including requirements for transparency of ownership), and to work with the Australian Securities and Investments Commission (ASIC) and other organisations on proper RTO naming protocols.*



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# Confusing Private RTO Names 1



AUSTRALASIAN COLLEGE OF EDUCATION AND TRAINING

TOID: 121666



AUSTRALIAN SCHOOL OF MANAGEMENT

AUSTRALIAN COMMUNITY Education College

● Early Childhood Training Solutions



Australian College

RESEARCH - EVIDENCE - KNOWLEDGE - PRACTICE



AUSTRALIAN ADULT LEARNING INSTITUTE



*Community Education Australia*



# Confusing RTO Names 2





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# Confusing RTO Names 3



**EmbassyCES**

ENGLISH LANGUAGE TRAINING WORLDWIDE

 **ELISIS**

ENGLISH LANGUAGE SCHOOL IN SYDNEY

**SACE**

**SOUTH AUSTRALIAN  
COLLEGE OF ENGLISH**

 **discoverENGLISH**

CRICOS Code: 03262J

 **AICE** Australian International  
College of English

CRICOS Provider No 02834G



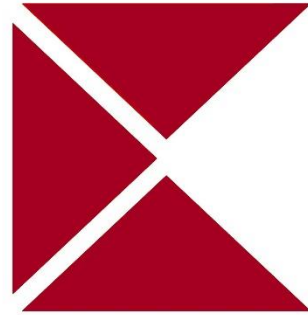


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# Confusing RTO Names 4



CRICOS No :03134F



**ANCE**  
*key to opportunity*



# AELC

# AUSTRALIAN ENGLISH LANGUAGE CENTRE



SYDNEY COLLEGE OF ENGLISH





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# Confusing RTO Names 5



# SIIT

SYDNEY INSTITUTE OF INTERPRETING & TRANSLATING



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PROFESSIONAL  
EDUCATION  
INSTITUTE



NATIONAL COLLEGE  
AUSTRALIA





# Further Information

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