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PUBLIC SUBMISSION Proposed Updates to Schedule A of the .au Domain Administration Rules: Licensing
Consultation period: 21 April – 19 May 2026

Submission in Response to Proposed Changes to Schedule A (.au Licensing Rules)

Submitted by: Marcus Sellen, CEO Hader Institute of Education (RTO 45162) ABN 49 615 319 358 Registered Training Organisation – Regulated by the Australian Skills Quality Authority (ASQA)

1. Introduction and Standing

Hader Institute of Education is a fully online Registered Training Organisation (RTO 45162) regulated by the Australian Skills Quality Authority (ASQA) under the Standards for RTOs 2025. We deliver nationally accredited qualifications in community services, mental health, youth work, and alcohol and other drugs (AOD) across Australia.

We hold an edu.au domain name and submit this response as a regulated education and training provider with a direct and material interest in the integrity of the edu.au namespace. Our submission opposes the proposed expansion of eligibility that would allow unregulated short course providers and non-accredited training entities to hold edu.au domain licences.

2. Personal Background in the VET Sector and edu.au Domain History

I submit this response drawing on over two decades of personal experience founding, operating, and leading registered training organisations in the Australian VET sector — each of which has held an edu.au domain licence.

In 2004, I founded Selmar Institute of Education, a Melbourne-based RTO specialising in community services and early childhood education and care. The name Selmar was deliberately constructed to reflect my personal commitment to the sector — combining my surname, Sellen, and my first name, Marcus. Under my leadership, Selmar grew from a start-up operation to a nationally recognised RTO with revenues exceeding \$13 million and a team of more than 120 staff. Selmar held an edu.au domain for the duration of my tenure, and that domain was integral to the organisation's credibility and market positioning. Students, industry partners, and government stakeholders relied on the edu.au address as a signal of legitimacy and quality.

I subsequently sold Selmar into the Catalyst Education group, one of Australia's larger private VET consolidators at the time, where I held a number of senior leadership roles including interim CEO. The organisations within the Catalyst group collectively held multiple edu.au domains. This experience gave me direct insight into how edu.au domain licences function as trust infrastructure across a portfolio of regulated providers — and how that trust can be damaged when the namespace is not carefully managed.

I acquired and am the CEO of Hader Institute of Education in January 2022. Hader is a fully online RTO regulated by ASQA, delivering nationally accredited qualifications in mental health, youth work, community



services, and alcohol and other drugs. Hader holds an edu.au domain and operates in full compliance with the Standards for RTOs 2025.

Across these organisations, I have observed first-hand the role the edu.au namespace plays in the broader education and training market. The domain is not merely a technical address — it is a trust signal that students, employers, and government agencies actively rely upon. That trust has been built over many years, by many regulated providers, operating under demanding compliance frameworks. It is precisely because of this history that I write in strong opposition to changes that would extend edu.au access to entities that have not earned that trust through regulatory accountability.

3. Summary of Our Position

We strongly oppose the proposed expansion of the definition of 'Entity Delivering Non-Accredited Training' to include providers of micro-credentials. This change, if adopted, would fundamentally dilute the credibility and consumer trust that the edu.au namespace has built over decades as a marker of legitimate, regulated Australian education and training.

Our position is clear: access to the edu.au domain should be restricted to entities that are registered, accredited, or approved by a recognised Commonwealth, State or Territory education or training authority. Any entity that does not meet this threshold — regardless of how it describes its services — should not be eligible.

4. The edu.au Domain Carries Significant Public Trust

The edu.au namespace exists to identify legitimate, quality-assured education and training institutions. Students, employers, government agencies, and the broader public reasonably interpret an edu.au domain as a signal that the entity behind it is regulated, accountable, and subject to enforceable quality standards.

This trust is not cosmetic. It directly influences:

- Student decision-making — learners choose providers partly on the basis of domain legitimacy;
- Employer confidence — businesses rely on edu.au credentials as a quality indicator when assessing applicant qualifications;
- Government and regulatory confidence — funding bodies and policy makers use domain presence as a proxy for institutional legitimacy.

Extending edu.au access to unregulated entities erodes this trust. Once the domain is devalued as a quality signal, that erosion cannot be reversed simply by tightening eligibility rules in the future.

5. Non-Accredited Training Providers Are Not Held to the Same Standards

RTOs operating under the Standards for RTOs 2025 are subject to extensive regulatory obligations including:

- Registration and ongoing audit by ASQA, VRQA, or TAC WA;
- Compliance with 15 Outcome Standards covering training and assessment quality, learner support, marketing accuracy, and complaints handling;
- Mandatory disclosure obligations regarding fees, refund policies, and qualification outcomes;

- Requirement to employ qualified trainers and assessors meeting defined competency standards;
- Real consequences for non-compliance — including registration suspension or cancellation.

By contrast, a provider of non-accredited short courses or micro-credentials faces no comparable regulatory framework. Any person or company can establish a micro-credential business today with no registration requirement, no quality audit, no qualified trainer obligations, no standardised assessment requirements, and no enforceable consumer protections. Awarding these providers an edu.au domain licence implies a level of quality assurance that simply does not exist. It is misleading to consumers and damaging to the sector.

6. The Micro-Credentials Market Is Specifically Vulnerable to Misuse

The micro-credentials market is currently one of the fastest-growing and least-regulated segments of the Australian training landscape. Without a nationally consistent regulatory framework — which does not currently exist — there is no mechanism to ensure that a micro-credential provider holding an edu.au domain is operating to any identifiable standard. The proposed change would allow providers to leverage the credibility of the edu.au domain to market products that have no independent quality verification. This is not a hypothetical risk. It is a direct and foreseeable consequence of the proposed change.

7. The Proposed Change Undermines Regulated Providers

RTOs invest significantly in regulatory compliance. Maintaining ASQA registration requires ongoing investment in systems, staff competency, assessment validation, learner support infrastructure, and marketing compliance. The standards are demanding, and non-compliance carries real consequences.

Allowing unregulated providers to access the same domain namespace as regulated RTOs creates a two-tier system where the regulatory burden is borne by those who comply, while those who face no regulatory obligations gain access to the same trust markers. This is not equitable, and it is not in the public interest. If auDA's intent is to be inclusive of emerging training modalities, the appropriate response is to wait until a credible regulatory framework for those modalities exists — not to extend edu.au access in advance of it.

8. Specific Response to the Proposed Changes

8.1 Expansion of 'Entity Delivering Non-Accredited Training' to include micro-credential providers

We oppose this change. The proposed expansion broadens access to a category of provider that is entirely self-defined, with no external validation, registration, or accountability mechanism. 'Micro-credential' is not a regulated term in Australia. Extending edu.au access on the basis of self-description is indefensible from a consumer protection standpoint.

Recommendation: Remove micro-credentials from the expanded definition. If auDA wishes to accommodate credible micro-credential providers in the future, eligibility should be conditional on recognition by a Commonwealth or State/Territory education authority or accreditation body.

8.2 Expansion of 'National Interests and Responsibilities' to include Commonwealth-registered entities



We support this change. Registration or accreditation with a Commonwealth education or training authority — such as ASQA — is an objective, verifiable standard. This expansion appropriately recognises that RTOs operating nationally should be eligible for the edu.au namespace at the third level.

8.3 Addition of the 'Value Judgement' definition and legacy exemption

We support both of these changes as sensible administrative clarifications that do not materially affect the integrity of the namespace.

9. Recommended Approach

We recommend that auDA adopt the following principle as the foundational eligibility threshold for the edu.au namespace:

A Person is eligible for an edu.au domain licence only where it is registered, accredited, or approved by a recognised Commonwealth, State or Territory education or training authority.

This would include RTOs (ASQA, VRQA, TAC WA), Higher Education Institutions (TEQSA), schools, childcare providers (ACECQA), and other formally regulated bodies. It would exclude any entity — including non-accredited training providers and micro-credential businesses — that has not been subject to independent quality assessment by a recognised authority. The existing warranty and Eligible Referee pathway may remain as a residual option for genuine edge cases, but should not be the basis for opening access to entire unregulated categories.

10. Conclusion

The edu.au namespace is one of Australia's most trusted digital assets in the education sector. Its value derives directly from the quality and regulatory standing of the entities that hold licences within it. Any change that dilutes the eligibility threshold — particularly in favour of unregulated providers — weakens the signal that edu.au sends to students, employers, and the public.

We urge auDA to reject the proposed expansion to micro-credential and non-accredited training providers, and to reaffirm regulation by a recognised authority as the non-negotiable baseline for edu.au eligibility.

We thank auDA for the opportunity to contribute to this consultation and welcome further engagement on this issue.

Marcus Sellen

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Chief Executive Officer Hader Institute of Education