

**From:** [Li, Diana AEST:EX](#)  
**To:** ["lois@jobready.ca"](mailto:lois@jobready.ca)  
**Cc:** ["celeste@jobready.ca"](mailto:celeste@jobready.ca)  
**Subject:** 193 - Compliance Order  
**Date:** Friday, March 15, 2019 5:42:00 PM  
**Attachments:** [193 - Compliance Order 2019.03.15.pdf](#)  
[image001.jpg](#)  
[image002.jpg](#)  
**Importance:** High

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Dear Ms. McNestry,

Please find attached a compliance order which requires your immediate attention.

Sincerely,

Diana Li  
Regulation Administrator  
Private Training Institutions Branch  
Ministry of Advanced Education, Skills and Training  
203 – 1155 West Pender St, Vancouver, BC V6E 2P4  
P: 604-398-6092 | F: 778-945-0606 | Toll Free: 1-800-661-7441  
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# Private Training Institutions Branch

March 15, 2019

**Sent by email:** *lois@jobready.ca, celeste@jobready.ca*

Lois McNestry  
Discovery Community College  
150 - 1260 Shoppers Row  
Campbell River, BC V9W 2C8

ID-00193

Dear Ms. McNestry:

## **RE: Issuance of a Compliance Order**

Please see attached Compliance Order issued to Discovery Community College (the "Institution").

Compliance orders are one of the criteria used to determine an institution's category assignment.

For the reasons outlined below, I am satisfied that the Institution engaged in advertising in relation to the Police Foundations program (the "Program") that was false or misleading, in contravention of s.41(2) of the *Private Training Act*.

Pursuant to s.17 (4) of the *Private Training Act*, the Compliance Order will be published on the Online Directory for a period of one year.

I am not ordering that the Institution take any specific action to remedy the contravention, as I consider that the contravention has been remedied.

I note that I am making this determination, in part, on the basis that the Institution has confirmed it will submit a new title for the Program.

I have also identified one other contravention, which is detailed below, and is not the subject of the Compliance Order.

## *The Records*

Prior to making this determination, I have reviewed PTIB's Inspection Findings letter dated January 11, 2019 (the "Inspection Findings") and the Institution's response dated February 11, 2019 (the "Response").

### *The Program*

I find the Program is intended to prepare a student for a variety of positions within law enforcement. It is not a direct path to becoming a police officer.

This finding is consistent with the Program Outline, the student employment outcome data and the Institution's Response.

The Program Outline describes the career occupations for which the Program is intended to prepare a student as follows:

The Police Foundations diploma program is designed to provide learners with the knowledge, skills, and attitudes that will enable them to work at various levels of policing, public safety, security, by-law enforcement, and related justice professions. Graduates will be better prepared and more qualified to seek employment in these fields.

The student employment outcome data shows that, one year after having graduated from the Program, only one out of 118 students was employed as a police officer.

The Institution submits that "the employment outcome data one year post graduation is not a reasonable basis on which to assess the outcome of the Program" because the data represents "interim positions" and does not show the ultimate position the student may achieve. I do not agree.

When a student enrolls in a career training program and the institution lists the potential career occupations, the reasonable expectation is that the student will be prepared to enter these occupations upon graduation.

If, as the Institution claims, the Program is intended to prepare students to be police officers in five to seven years time, then this should be clearly stated in the promotion and advertising of the Program.

### *Misleading Advertising*

I find that prospective students would reasonably infer from the representations made by the Institution that the Program leads directly to employment as a police officer. This is misleading.

I find, in particular, the following two representations were misleading:

#### **1. Facebook post, June 4, 2018**

Image of a police officer and the following statement:

"98.46% of the graduates from our #BC #Police Foundations training program have found #jobs within 1 year of graduation. Their common #career options include municipal as well as provincial police services, #RCMP, customs and border security..."

## **2. Institution's website, October 18 and 31, 2018**

Image of a police officer and the following statement:

"Aspiring police officers and law enforcement professionals require post-secondary education. But you don't have to spend time studying an unrelated field that doesn't interest you. Instead, consider Police Foundations training, which can be the bridge to a rewarding career in public safety."

The institution says that the use of the photograph of a police officer was not misleading as "not one photograph can illustrate all of the possibilities" and "given that employment as a police officer is an employment outcome achieved by some graduates of the Program, it cannot be said that it amounts to false advertising to use a photograph of someone in such a position".

I do not agree. The photograph is a powerful image, the purpose of which is to attract students interested in employment as a police officer. The image makes a direct link between the Program and the career occupation of police officer. As demonstrated by the employment outcome data, there is no direct link.

The statement in the Facebook post (#1) lists the municipal and provincial police services and the RCMP as the first two "common career options". This statement, combined with the image, conveys a false impression that a likely outcome following graduation from the Program is employment with police services and the RCMP.

I note that a copy of the Facebook post was published in a CBC news article which was attached to the Inspection Findings. In making my decision, I have only considered the Facebook post, not the accompanying CBC article.

The Institution has referenced two statements included in its enrolment contract and curriculum guide which notify applicants of the varying requirements for law enforcement personnel employment and specifies that completion of the Program does not guarantee entry into these professions. While these provisions

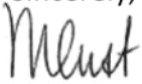
are accurate and may be helpful to students, in my view, they are not sufficient to correct the false impression created by the misleading advertising.

*Other Contravention*

I find, contrary to s. 19(2) of the *Private Training Regulation*, the Institution failed to hold a Program Advisory Committee (PAC) meeting within the last two years.

The Institution has confirmed that a PAC meeting was held on February 5, 2019 and another meeting is scheduled for May 7, 2019. I am therefore not setting any requirements to remedy the contravention.

Sincerely,

A handwritten signature in black ink, appearing to read 'MLust', is positioned above the printed name.

Monica Lust  
Registrar and Executive Director

Enclosure: Compliance Order



## Private Training Institutions Branch

# Compliance Order

The following order is made by the registrar of the  
Private Training Institutions Branch pursuant to s. 32 of the *Private Training Act*.

Discovery Community College (ID-00193), by engaging in advertising in relation to the Police Foundations program, that was false or misleading, has contravened section 41(2) of the *Private Training Act*.

Issued:  
March 15, 2019

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Monica Lust  
Registrar, Private Training Institutions  
Branch