

# BRITISH ACCREDITATION COUNCIL INSPECTION REPORT

## SUPPLEMENTARY INSPECTION REFERRAL (Online, Distance & Blended Learning)

**PROVIDER:** Online Education

**ADDRESS:** 4407/4 Daydream Street  
Warriewood  
New South Wales  
2102  
Australia

**HEAD OF PROVIDER:** Mr Anthony Mondello

**ACCREDITATION STATUS:** Probation accreditation

**DATE OF INSPECTION:** 17-20 September 2018

**ACCREDITATION COMMITTEE DECISION AND DATE:** Awarded full accreditation 31 January 2019

## **PART A – INTRODUCTION**

### **1. Background to the provider**

Online Education Proprietary Limited (the Provider) is a provider of online courses. Its base is located in Warriewood, which is a suburb in Northern Sydney, Australia. The Provider was founded and registered in 2006, as a proprietary limited company in Australia, by its present owner.

The first online course, which was offered was in interior design. This was firstly offered in the United States of America (USA) and, subsequently, in the United Kingdom (UK) market with limited success. In 2007, promotion of the course in the home Australian market brought in more enrolments and the company began to expand its operation into New Zealand, Canada and South Africa. In late 2007, a second online course in photography was developed and marketed. In 2008, the Provider moved to larger premises and more staff were employed. With the appointment of a Chief Executive Officer (CEO) in 2008, the size of the Provider's activities grew rapidly. In 2014, the third course, an online art appreciation course, was launched.

Enrolments on the three courses have increased steadily and, currently, the Provider has 11,000 active learners, the majority being based in the English speaking countries of Australia, Canada, USA and the UK. With courses now being offered in eight other languages, enrolments in other countries are steadily rising.

The owner of the Provider works remotely for the greater part of the year and the day-to-day running of the operation is managed by the CEO and his team of 11 local part and full-time staff. Tutors and learner support staff are located in countries around the world.

The Provider makes use of serviced offices in 50 overseas locations. These provide a mail forwarding facility and serve to reassure online applicants that there is a local presence, although no Online Education staff are employed in these offices.

### **2. Brief description of the current provision**

Online Education Proprietary Limited currently runs four online courses. These are Interior Design, Photography, Art Appreciation and Makeup Artistry. These courses are based on 12 modules, each of which can normally be completed in two weeks. The modules are downloaded by the learner and can be worked through at the learner's own pace. Assignments are set for each module and, after the first two modules, learners are required to submit and pass a module before they have access to the next module. The courses can be completed in about 24 weeks. However, learners may take up to one year to complete.

Learners who have completed their course can opt for an advanced module in their subject. These are single modules with a further assignment and offer the learner a chance to pursue a particular field of interest. The advanced modules are offered, for example, in wedding photography, photographing food and kitchen and bathroom design. Advanced modules for makeup artistry are in preparation.

During the week of the inspection, a new course in makeup artistry was launched. This was the result of a significant period of planning and investment, particularly in video content. A fifth course, based on nutrition, is being planned for next year. The organisation is looking to further extend the range of courses it provides and to offer further language versions.

Courses are currently offered in English, French, Spanish, Portuguese, Italian, Dutch and Japanese. For each of these courses there are tutors who work in that language as well as international student support team members and social media managers.

Tutors in all subject areas tend to be professionals working in that field and many are authors of books or contributors to journals and magazines. Prospective applicants for courses can view the profiles of the tutors on the Provider's websites.

In 2017, there were 24,000 enrolments. The majority of participants are from a wide range of English-speaking markets including Australia, UK, USA, Canada, New Zealand, Ireland and South Africa. Although the courses are aimed at adults, juniors are not currently excluded. In 2017, there were 630 registered participants under the age of 18. The photography course is the most popular and accounted for approximately half of all enrolments.

The Provider employs tutors on a freelance basis. There are currently about 40 tutors worldwide with more being recruited for the newly launched makeup artistry course, which had attracted a dozen enrolments in the first week. At the time of the inspection, there were 14,261 enrolled learners, of whom 734 were under the age of 18.

### **3. Inspection process**

The initial inspection was carried out by one inspector over three days at the head office in Warriewood. Meetings were held with the Managing Director and the CEO. Further interviews were held with the Business Development Manager, the Accounts Manager, the Software Engineer and a Graphic Designer. Two of the student support team were interviewed and two tutors. Telephone and online video interviews were held with three further tutors and with three learners. The inspector was given demonstrations on how the Information Technology (IT) platform was used to monitor all activity within the Provider globally, including enrolments and payments, learner assignment submissions, tutor and learner interactions, marked assignments and communications between staff. A weekly staff meeting at the office was attended by the inspector. Modules from all courses and their corresponding assignments were reviewed as were the websites for each course. Staff provided all requested documentation. The setting up of telephone and online video interviews was extremely helpful.

Following from the inspection report and the Accreditation Committee's assessment, a follow-up inspection was carried out by the same inspector. This inspection was of documentation submitted by the Provider in support of actions taken in response to action points identified in the initial report. Online or telephone interviews were held with the CEO in Australia and with two tutors and one student based in the UK.

### **4. Background to supplementary inspection**

Several action points were identified in the initial inspection. The areas identified were the monitoring and appraisal of online tutors and appraisals of head office staff. A range of policies needed to be drafted and made accessible to staff and learners. The Provider has made significant changes including to its policies and practices to address the points raised in the initial report. Documentation relating to these developments has been inspected and evaluated without the need for a further visit to the head office in Australia.

The Provider has made considerable, prompt and effective progress in responding to the action points and recommendations identified in the initial report.

### **5. Inspection History**

<b>Inspection Type</b>	<b>Date</b>
Full Accreditation	9-11 April 2018

## **PART B – JUDGMENTS AND EVIDENCE**

*The following judgments and comments are based upon evidence seen by the inspector during the inspection and from documentation provided by the provider.*

### **1. Significant changes since the last inspection**

The Provider has engaged a third party Human Resources (HR) consultant to devise and advise on an appraisal process for their head office team members.

### **2. Response to action points in the last report**

*2.5 Policies and procedures for tutors must be coherently compiled in a single document folder so that staff are informed of and have access to all relevant documents.*

These have now been satisfactorily collated on the online management system and include such documents and policies as an organisational chart, the online safety policy, complaints procedure, plagiarism policy, marking guides, training guides and a list of tutors who have Working with Children clearance. Working with Children clearance is the Australian equivalent of Disclosure and Barring Service checks.

*3.1 3.2 When new staff are recruited references must be filed and qualifications checked with copies held on file.*

A comprehensive checklist has been developed and put into operation for use when appointing new staff. This has appropriate check boxes to confirm that qualifications are verified and references are requested.

*3.3 Annual appraisals for staff and tutors must be comprehensive, structured and formally documented.*

The Provider has engaged the services of an independent HR consultant to develop and administer an appraisal process for Head Office staff members. Appropriately completed samples of appraisals have been submitted for inspection.

*5.1 Tutor performance must be systematically monitored.*

A comprehensive checklist is now in use to monitor tutor performance. A cross-section of students are consulted to verify that their tutor is following guidelines and complying with the requirement to give detailed and constructive feedback on assignments and in a timely fashion. Any areas for improvements are noted and these, as well as positive feedback, are notified to the tutor.

*5.10 5.11 Marking of learners' assignments must be standardised with a marking scheme that is transparent and meaningful to learners.*

Detailed marking guides for each of the online courses have been produced. These provide tutors and students with clear descriptors of what the numerical marks mean. Use of the guides will serve to harmonise assessment of assignments among tutors and will assist students in identifying where improvements can be made. Tutors interviewed found the marking guide a positive development.

*5.12 Guidelines relating to plagiarised work must be produced for tutors.*

The Provider has produced clear guidelines for tutors who suspect that a student's work may be plagiarised. A policy effectively sets out the steps to be taken in such cases. Potential punitive steps in the case of plagiarised work have been included in the terms and conditions on enrolment.

*6.4 There must be regular appraisals of tutors.*

The task of tutor appraisal has been assigned to the Operations Manager. An effective system of tutor monitoring is being put into practice which will contribute to the process of tutor appraisals. These appraisals are planned to take place over the coming months.

*11.6 Learners must have access to a clearly indicated complaints procedure.*

Learners now have appropriate access to a complaints system through the Provider's online messaging system. Communications go directly to the support team. Complaints can be submitted using a library template.

*14.2 14.3 Management must produce annual reports which detail the year's activity against targets and incorporate action plans.*

A detailed annual report has been produced. This specifies performance in the last year and sets out targets in revenue, student numbers, creation of new courses, new markets and other initiatives.

*16.1 16.4 Detailed feedback from learners and tutors must be systematically collected at different stages of the programme and analysed to identify areas for improvement.*

Currently the Provider carries out an internal survey which is completed by students at the end of their course. This comprises a set of ten questions relating to different aspects of the learner experience whilst engaged in the course. It is proposed to additionally carry out this survey at a mid-point in the course. A supplementary comment box will be added to the survey to allow students to make further open comments and give feedback.

*16.3 The Provider must introduce a formal mechanism for reporting on the action taken as a result of learner feedback.*

The results of the above feedback survey will be monitored by student support and comments labelled as read or flagged for further action.

Survey questions and open feedback will be formatted into a bi-annual report which will also feature graphs and comparisons with previous surveys. Reports will be shared with head office staff at their weekly meetings. There will be a nominated quality assurance team member to action any specific improvements.

### **3. Response to recommended areas for improvement in last report**

*The Provider should introduce formal job descriptions for administrators in order to avoid any overlap in their roles and for clarity.*

Detailed job descriptions are now in place for all members of head office staff and for all staff working remotely.

*Terms and conditions could be expanded to cover other eventualities such as change of tutor.*

Appropriate changes have been made to Terms and Conditions for all courses and in all languages to include provision for changes of tutors. Actions to be taken when plagiarism is detected are also now set out in the Terms and Conditions.

#### 4. Compliance with BAC accreditation requirements

##### 4.1 Management, Staffing and Administration (spot check)

The standards are judged to be:  Met  Partially Met  Not Met

###### Comments

Policies and procedures are now coherently compiled in a single file on the Management System, IT platform, where they can be easily accessed by tutors and support staff.

Qualifications and references are appropriately checked prior to new appointments being made.

A professional and effective strategy for staff appraisals has been introduced using the services of an external HR consultant.

##### 4.2 Teaching, Learning and Assessment (spot check)

The standards are judged to be:  Met  Partially Met  Not Met

###### Comments

A robust tutor recruitment system has been introduced. The Designated Safeguarding Lead (DSL) is charged with carrying out appropriate DBS checks or their national equivalents and seeking references for new staff. A comprehensive set of online safety guidelines and policies is included in tutor training and induction. A spreadsheet is maintained of dates when checks are due for renewal.

Alerts advising parental guidance are posted on social media sites used by the Provider. It is not clear how parents or guardians might access this warning if they are not themselves enrolled on a course.

A clear and coherent assessment marking scheme for assignments has been introduced. This allows for coordinated standard setting between tutors and gives students objective feedback and guidance on what the numerical assessment of their assignments means.

An effective strategy for dealing with suspected plagiarism has been put in place, allowing for suspension of a student in certain circumstances. This is now clearly stated in the Terms and Conditions on enrolment.

##### 4.3 Learner Support (spot check)

The standards are judged to be:  Met  Partially Met  Not Met

###### Comments

An appropriate complaints system has now been introduced. This is accessed through the online messaging system and complaints are directed to the Student Support Team.

##### 4.4 Management of Quality (spot check)

The standards are judged to be:  Met  Partially Met  Not Met

###### Comments

A survey is offered to students at the end of their courses. Feedback is requested through ten questions to which students ascribe a one to five star rating. These ratings are reviewed annually and produce some useful data. The Provider also makes use of an online reviewer of online business services.

An enhanced survey, which the Provider will now administer at a half-way point in courses, will produce more information about the learner experience and allow prompt remedial action when it is appropriate. The production of bi-annual reports will also give the Provider a useful quality assurance mechanism.

The requirement to provide feedback, however, remains optional and is not always taken up.

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4.5 Premises and Facilities – face-to-face component (spot check)

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**The standards are judged to be:**  Met  Partially Met  Not Met

**Comments**

This is not applicable as this was a remote inspection of documentation and online and telephone interviews, premises and facilities were not part of the inspection.

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4.6 Compliance Declaration

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**Declaration of compliance has been signed and dated.**  Yes  No

**PART C – SUMMARY OF ACTION POINTS**

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**ACTIONS REQUIRED**

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None

High

Medium

Low

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**RECOMMENDED AREAS FOR IMPROVEMENT *(to be reviewed at the next inspection)***

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The Provider is advised to explore ways within its enrolment procedure to ensure that when minors are enrolled, their parents or guardians are notified that they should monitor contributions to the social media sites.

The Provider is advised to look at ways in which it can include all students in the feedback process.

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**COMPLIANCE WITH STATUTORY REQUIREMENTS - FURTHER COMMENTS, IF APPLICABLE**

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