



QQI

Dearbhú Cáilíochta agus Cáilíochtaí Éireann
Quality and Qualifications Ireland

QQI COMPREHENSIVE POLICY DEVELOPMENT PROGRAMME

FEEDBACK REPORT

FOLLOWING THE CONSULTATION PROCESS ON

White Paper on Topic-Specific Quality Assurance Guidelines for Blended Learning

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1. Introduction

The overall structure and approach towards the development of the statutory quality assurance (QA) guidelines is set out in this [diagram](#). The structure involves [CORE QA Guidelines](#) which capture in one place those elements which are fundamental and common to all providers associated with QQI. All other categories of guidelines are a supplement to the CORE QA guidelines. Sector and Topic-Specific QA guidelines are examples of additional guidelines on specific areas beyond the core. They apply as appropriate to individual providers.

QQI has published Sector-Specific guidelines for the Designated Awarding Bodies (universities, DIT and RCSI), Institutes of Technology, Private and Independent Providers and Education and Training Boards. They capture specific legislative requirements for each set of providers.

QQI is also developing a series of Topic-Specific QA guidelines, which apply to a particular topic or type of provision. This includes topics that are optional for providers depending upon the range and type of their provision, such as the [Statutory Topic-Specific QA Guidelines for Blended Learning Programmes](#). Topic-specific QA guidelines have been published for providers of apprenticeship programmes and providers of research degree programmes.

This report sets out the response of QQI to the feedback received on the development of these QA guidelines and describes the next steps in the finalisation of this QA Guideline. While it has not been feasible to capture the full extent of every comment made by each contributor in the consultation process, this report tries to capture the most salient points and the areas for action by QQI. The feedback on the White Paper was used to inform the final quality assurance guidelines published.

The remainder of this document provides an overview and summary of the feedback received from the institutions and other core stakeholders on the draft of the quality assurance guidelines.

2. Consultation process

These Topic-Specific Quality Assurance Guidelines represent a significant milestone after a two-year consultation process. QQI published an earlier version of this white paper in December 2015 for consultation as the **White Paper on the Topic-Specific QA Guidelines for Flexible and Distributed Learning**. Those draft guidelines were developed by an expert group representing further and higher education and training institutions (with experts nominated) including other experts on the topic and an independent international chair. They were published on the [QQI consultations page](#) on 17 December 2015. QQI received feedback from institutions and other interested stakeholders on the proposed guidelines and a variety of consultation methods were used to gather feedback. Consultation on this first White Paper closed in February 2016. Feedback received during the first consultation was extremely comprehensive and although many issues raised by stakeholders referred to learning experiences in a blended context some were exclusively for learning in an online context. Feedback at the stage resulted in the decision to retitle to **Topic-Specific Quality Assurance Guidelines for Blended Learning Programmes** and reorientate them to have a focus on online learning as the most typical non-face-to-face part of the blend. It was also decided to develop a separate green paper to encourage discussion on the overall impact of online learning, technology and digital capacity and developments on teaching and learning and the more traditional “programme structure” within the existing education and training context. This is with a view to considering the necessity for a more comprehensive set of quality assurance guidelines on online learning.

Following consideration of the stakeholder feedback, this revised version of the White Paper on Blended Learning was published on the [QQI consultations page](#) on 22 August 2017, with consultation closing on 3 November 2017. In the main, QQI stakeholders and providers expressed support for the balanced reasonable approach within the content and welcomed the rationale for the Guidelines for Blended Learning Programmes. Other respondents were critical of the proposals, and some respondents were critical of some proposals but supportive of others. Across the education and training providers some of the feedback was consistent, including some of the more critical responses, but in other cases responses that were specific to a more narrow context provided by different contributors were mutually irreconcilable. While it is practically impossible to note all of the responses, the themes set out in section four of this feedback report capture the majority of the overall responses, all of which will be published unless otherwise requested by the respondent.

3. Sources of feedback

Feedback on the White Paper for the QA Guidelines for Blended Learning was received from a range of stakeholders involved in the development of blended learning programmes. In keeping with the QQI consultation framework, all submissions received through the formal public consultation processes were [published](#) on the QQI website, unless otherwise requested. The list of organisations who contributed to the consultation is provided in Appendix 1. QQI would like to thank all contributors to the consultation process. The feedback received was excellent and made a significant contribution to the content of the quality assurance guidelines. QQI is grateful to all those who took the time to provide feedback and demonstrate their absolute commitment to the quality and standard of blended learning in Ireland. QQI also thanks the many respondents who provided useful resources on blended learning and these will be made available to providers via the QA Guidelines [website](#). QQI is delighted to add to these resources at any time and providers and other stakeholders are encouraged to forward same to QQI.

The European Association for Quality Assurance Agencies (ENQA) has established a [working group](#) to look at “eLearning” in the context of the ESG, 2015 and the work of the national QA agency. QQI made contact with ENQA to ensure that these national QA guidelines take into account any future proposed European contributions.

4. Summary of feedback

4.1 The definition of blended learning

Many submissions queried the definition of “blended learning” used in the guidelines. In particular there was a desire for this to be expanded to offer a more prescriptive definition of blended learning. Views on what form this alternate definition might take varied widely. Various definitions that apply locally were provided but were too specific to that local policy context to be universally applied.

QQI response

The definition of blended learning used was decided as the most appropriate for the Irish education and training sectors at this point in time by the expert group who developed the guidelines. While there is clearly a continuum of e-learning which involves varying proportions of online delivery, the guidelines clearly set out that blended learning is “the integration of classroom face-to-face learning

experiences with online learning experiences” as defined by Garrison and Kanuka (2004).¹ Furthermore, the structure and content of the guidelines consider blended learning programmes to be face-to-face programmes which typically incorporate online learning as the flexible/distance element of the blend. This has led to the focus in the guidelines on what may be described as online learning in a blended context. Providers should nevertheless continue to apply the QA context principle. As stated in the QQI Policy on QA Guidelines, quality systems are context dependent, i.e. the scale and scope of a provider’s provision will impact on how it operates quality assurance, and this is equally applicable in relation to blended learning programmes. The use of the term “blended learning” in the guidelines is not intended to constrain the terminology or the practices used by individual providers.

4.2 The exclusion of “fully online” programmes

A number of submissions mentioned the lack of reference to fully online programmes and questioned their absence from these guidelines.

QQI response

In light of feedback received during the first consultation, it was decided to develop guidelines specifically on blended learning, as defined in 4.1 above. It was also decided to develop a separate green paper to encourage discussion on the impact of online learning technology/digital capacity on teaching and learning within the existing education and training context. This is with a view to considering the necessity for a more comprehensive set of quality assurance guidelines on online learning. As outlined above, due to the fact that blended learning will always include a face-to-face element, the guidelines are not intended to cover programmes where learning is fully online or providers that operate in an exclusively online mode, hence the omission of references to them.

4.3 Requests for more prescriptive guidance

Many providers were looking for more prescriptive guidance on the practical details of quality assuring blended learning programmes. For example, in some sections more prescriptive examples

¹ Garrison, D.R. & Kanuka, H. (2004). Blended Learning: Uncovering Its Transformative Potential in Higher Education. *Internet and Higher Education*, 7(2), 95-105, p. 96.

were sought. A breakdown of the proportion of Technology Enhanced Learning/online hours versus in-class/face-to-face hours was requested.

QQI response

QA guidelines do not provide this type of detail as this would see them enter into a high level of prescription. It is ultimately up to providers to interpret the guidelines within their own context. As stated in the Core QA guidelines (1.6), “the desired level of quality and complexity of related procedures will be influenced by a provider’s context, including its scope; the NFQ level of provision and overall provider goals, as well as its external obligations to all stakeholders”. QA is provider-owned and QQI’s role is to publish guidelines to be used by providers of higher, further and English language education and training when designing, establishing, evaluating, maintaining, renewing and reviewing these QA policies and procedures, as stated in the 2012 Act. It is beyond the remit of QQI to prescribe how providers should quality assure their provision. However these Topic-Specific QA guidelines do infer that all types of teaching and learning provision will impact upon the learning experience and the guidelines should therefore apply to blended learning that is neither credit-bearing nor leading to a qualification. Massive Open Online Courses (MOOCs) and other less formal kinds of blended learning, for example, may be a learner’s first experience of online interaction. To mitigate the risk of reputational damage to the provider, the expectations and good practice captured in the guidelines should be considered. Individual providers may choose to have more or less restrictive internal QA procedures for such programmes based on their own strategic decisions about risk appetite and investment. A resources section has been added to the end of the guidelines as an annex, which may offer providers more specific and practical detail on the quality assurance of blended learning programmes.

4.4 Moderation of online courses

Feedback raised concerns about the level of moderation that the guidelines were seen to prescribe for online materials, particularly when compared to existing practice in relation to more “traditional” face-to-face courses. Some providers felt that the need for peer review in the development of blended learning courses and course materials was out of sync with practices already in place. Furthermore, the need for specialist technical knowledge when developing and delivering online content was considered by some to be a challenge. A number of respondents also expressed resourcing concerns in relation to this area.

QQI response

The *Topic-Specific Quality Assurance Guidelines for Blended Learning* are a supplement to the *QQI Core Statutory QA Guidelines* and *Sector-Specific QA Guidelines*. Providers are required to “have regard to” QQI’s QA guidelines when establishing their own quality assurance procedures. A provider delivering blended learning programmes is required to “have regard to” the Core QA Guidelines, their own Sector-Specific guidelines and the Topic-Specific Guidelines for Blended Learning. QQI reminds providers that guidelines for programme development and approval (3.1), as well as programme monitoring and review (3.3), are clearly laid out in the Core QA Guidelines, and should be considered when developing and providing programmes of education and training regardless of the mode of delivery. The Core QA Guidelines also include guidelines on staff recruitment (4.1) and staff development (4.3). Of particular relevance in response to the feedback received are the guidelines that “the provider ensures that academic and administrative staff have sufficient experience and expertise to fulfil their designated roles and thereby enhance the teaching and learning environment for students” and that the provider utilises the available resources to “offer opportunities for and promote the professional development of staff”. The *Topic-Specific Quality Assurance Guidelines for Blended Learning* supplement these Core guidelines and the Sector-Specific Guidelines to offer additional guidance relevant specifically to a blended learning context. Providers should have regard to all of the above-mentioned guidelines regardless of the mode of delivery of a programme. Finally, the lack of resources available does not diminish the responsibility of all providers to continue to have regard to QA guidelines even though initiatives around blended learning and quality assurance in general will always have a cost attached.

4.5 Learners outside of Ireland

Clarification was sought by providers on the exact meaning of a “learner outside of Ireland”. It was also questioned if the guideline relating to legal jurisdiction to operate is more relevant to Transnational Provision rather than being specific to blended learning.

QQI response

For the purpose of the Statutory QA Guidelines for Blended Learning, the term “outside of Ireland” refers to countries outside the state.

4.6 Differentiation between higher education and further education providers

Some feedback raised questions about the different application of these guidelines in the HE and FE sectors. It was felt that the research used to inform the development of these guidelines emanated mainly from the HE sector and there was not enough consideration of valuable work in the FE sector.

QQI response

The Sector-Specific QA guidelines address the more specific requirements of each sector. The Core Statutory QA Guidelines apply to all providers and the Topic-Specific Guidelines for Blended Learning apply to all providers who provide blended learning programmes leading to awards on the NFQ. Some experts say that more money has been spent on blended learning in the HE sector both nationally and internationally so there is a stronger evidence base from that sector. On the other hand, blended learning methodologies of their nature tend to blur the institutional and physical campus differences that traditionally differentiate the FET and HE.

The expert panel who developed these guidelines was made up of representatives from both the HE and FE sectors. Practice and research in both sectors informed the development of these guidelines. FE specific resources provided to QQI during the consultation process have been added to the resources annex

5. Next Steps

The final version of the Topic-Specific QA guidelines for providers of blended learning programmes incorporating the changes set out in this document is now published on the QQI website. QQI thanks all those who contributed to the development of these guidelines over the past two years.

As referenced earlier, the next stage of development is the establishment of a green paper (discussion paper) on the impact of technology, digital capacity and the need for QA guidelines for online learning.

Appendix 1

Names and representative organisations of those individuals who engaged in the consultation process on both the **White Paper on the Topic-Specific QA Guidelines for Flexible and Distributed Learning** and the **White Paper on the Topic-Specific Quality Assurance Guidelines for Blended Learning Programmes**:

Athlone Institute of Technology
Chevron Training and Recruitment
Dublin City University
Dublin Dún Laoghaire Education and Training Board
Dublin Institute of Technology
Dún Laoghaire Institute of Art, Design and Technology
Education and Training Boards Ireland
Gabrielle Kelly
Griffith College
Higher Education Colleges Association
Hibernia College
Institute of Guidance Counsellors
Institute of Technology Sligo
iScoil
Letterkenny Institute of Technology
Mary Immaculate College
Maynooth University
National Adult Literacy Agency
National Association of Principals and Deputy Principals
National College of Ireland
National Forum for the Enhancement of Teaching and Learning
SOLAS
Technological Higher Education Association
The Open University in Ireland
Trinity College Dublin
Union of Students in Ireland
University College Cork
University College Dublin
University of Limerick
Waterford Institute of Technology