

## QQI Consultation

### White Paper: Topic-Specific Quality Assurance Guidelines for Blended Learning - Version 2

#### Submission

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<b>Date</b>	02 November 2017

This response is made on behalf of Dublin and Dún Laoghaire Education and Training Board.

Dublin and Dún Laoghaire Education and Training Board gives QQI permission to publish this submission.

## **Submission/Considerations**

The White Paper was sent to all centres in Dublin and Dún Laoghaire ETB in mid-September 2017. What follows is a collation of responses received in September and October 2017. Feedback was invited from Further Education centres, Adult Education centres, training centres and Youthreach centres.

## **Summary**

This is a welcome policy development. It is timely and relevant as education provision increasingly exploits the potential of technology for innovation and for inclusion of those who cannot always attend traditional time-tabled, centre-based courses.

The guidelines are comprehensive, with helpful examples.

DDLETB does, however, find the definition and scope of blended learning given here problematic and would wish to see them further pinned down. The section Context (points 1-6, pp 6 and 7)) seems to infer that blended learning is a mix of distance learning and face-to-face classroom-based learning, with which DDLETB would concur. Yet some of the statements in the guidelines introduce a degree of ambiguity and we would like to see the guidelines presenting clarity on this.

Discussion of this and some others issues follows in the sections below

## **General feedback**

### **1 Definition of Blended Learning**

We acknowledge that much consideration has been given to date to the definition of Blended Learning in the guidelines. However, discussion and feedback on this subject make it clear that confusion and concern still remain about the definition and scope of Blended Learning. The policy and programme validation implications are considerable depending on what constitutes blended learning.

### **What is classroom face-to-face learning and what is on-line learning?**

On page 6 the definition ‘the integration of **classroom face-to-face learning experiences** with **online learning experience**’ is open to conflicting interpretation. Namely, one interpretation of the term **classroom face-to-face** that arose was a group of learners and a teacher being present together in the same physical classroom at the same time; another interpretation was a group and teacher face-to-face in a real-time class situation delivered

on-line by, for example, webinar (synchronous online). These are two very different interpretations, and taking the second interpretation could imply that a blended learning programme does not need a physical classroom at all and could therefore be justifiably also termed 'distance learning' or 'on-line learning'.

Helpfully Section 1.2, page 2, states that the guidelines 'are not intended to cover any programmes where the **sole** connection between the provider and the learner is online learning'. This is supported by section 1.3 Scope and relevance on page 5: 'blended learning where learners may be physically remote from other learners, teachers and assessors, the provider institution, or learning and support services, for **part** of their programme of study'.

These latter two sections in the guidelines suggest that classroom face-to-face learning experience must be in an actual physical classroom, and that the synchronous on-line classroom (webinar for example) would constitute the **online learning experience** in the second part of the definition.

We would like to see further clarification on this.

### **What does the integration of online learning experience mean?**

DDLETB has concerns about the scope of blended learning as laid out in the guidelines. It will be crucial to clearly distinguish between technology enhanced learning (TEL) in wholly centre-based provision and blended learning. DDLETB finds it difficult to determine from these guidelines whether centre-based programmes with TEL would fall within their remit.

On the one hand, QQI's position on blended learning and TEL seems to be clear from its Validation Policy and Criteria (p11):

4.6 Flexible and Distributed Learning (FDL) '...Unless otherwise indicated on the certificate of validation...validation does not allow for the use of flexible or distributed learning arrangements not considered during the validation process. **This restriction does not apply to the use of teaching and learning technology supports in the context of centre-based programmes.**'

Yet, on the other hand, statements in the guidelines such as the following are problematic for DDLETB.

- 'Assessment submitted, marked and returned to learners with feedback through electronic or other media', p7 point 6.
- 'Mechanisms such as web-based methods or correspondence for the transfer of learners' work directly to assessors have been approved and tested by the institution to ensure they are secure and reliable; and there is an institutionally approved and consistent means of proving or confirming the safe receipt of student work', p14.

- ‘Access to learning technologies such as virtual learning environment’, p6 section 2 Context, is too broad a statement. VLEs are increasingly used in our fully centre-based programmes.

While DDLETB may need to review or develop policy relating to VLEs, we question whether, within the context of a wholly centre-based programme, the above treatment of assessment hand-in and feedback, the use of such transfer mechanisms, and access to VLEs should bring a programme within the remit of blended learning.

What specifically does integration of online learning experience mean? Is it augmentation for example, through the use of VLEs, apps, devices, online content and YouTube videos? Or does it mean delivery of online content and assessments that are not covered in the face-to-face component of a course? Is the proportion of TEL within a centre-based course relevant to the determination? If so, what proportion of TEL, how many hours of TEL, would deem a course to be categorised as blended learning? These are questions that remain for us after studying the document.

Therefore DDLETB request further elaboration and clarity on the definition and scope of blended learning to distinguish it from technology enhanced learning in wholly centre-based contexts.

## **2 Use of the terms ‘blended’ and ‘online’ seems interchangeable**

In some part of the document the words ‘online learning’ are substituted for ‘blended learning’. And both ‘online learners’ and ‘remote learners’ are used. In addition the following phrase occurs:

‘A provider moving into online learning and other blended learning formats ...’, p8. This raises the question as to what is inferred by ‘other’ blended learning formats.

This interchangeability of terms may be contributing to confusion and questions around what constitutes blended learning; how it is distinct from wholly centre-based delivery on the one hand, and from wholly online delivery on the other. This White Paper is specifically for blended delivery of programmes.

We note that QQI is developing a Green Paper on On-line Learning and we would acknowledge this as a welcome development.

### 3 Some restatement of core guidelines

Many guidelines are already laid out in the core guidelines or in the validation policy. While some feedback related to the possibility of redundancy, overall DDLETB does not have a problem with this and suggests that it may be useful for those who may have need to refer to the Blended Learning guidelines but who may not be so familiar with core guidelines and programme validation policy.

### 4 Experts

The validation and evaluation of blended learning courses could potentially be problematic nationally due to the lack of experts, for both QQI and for ETBs.

#### Section: Introduction

‘To whom do these guidelines apply?’ pp3-4, section 1.1.

- We note that ETBs are not specified although their inclusion may be implied given that they are covered by the 2012 Act. We ask if there is a reason for this omission.
- We ask if reference is needed to provider relationships with second providers (eg City & Guilds, ECDL/CCNA) where the second provider delivers the online portion of the blended learning course.

#### Section: Organisational Context

Strategy and planning for blended learning, p10, section 3.1.2.

- Should the examples be made prescriptive?

‘Recruitment and admissions policies and processes **are open to** any online requirements’, p10.

- Clarification is sought for use of the phrase ‘are open to’. Does this mean ‘accommodate’ or ‘are reviewed in relation to’?

‘Any additional registration arrangements are made clear’, p10.

- Clarification is sought as to what this infers: does this infer pre-assessments of prospective learners to make sure they can handle the technology?

## Section: Programme Context

‘All online content is subject to approval’, p19, section 4.1.2.

Clarification is sought:

- Does this apply to all teaching materials that go on a VLE or to teaching materials used in the online/distance portion of a blended learning programme?
- Who should it be approved by and at what stage? In programme validation? There is currently no formal approval process and there is a concern that instituting such a process could risk constraining innovation and enhancement by the teacher. The same risk relates potentially to the requirement for all materials and media being subject to informed peer comment, p20, section 4.2.1. DDLETB values creativity, innovation and enhancement.

‘All modules of a programme are owned by an academic department’, p20, section 4.2.1.

- While this makes sense in a third level context, the ETBs do not run academic departments and therefore it is difficult to see how this statement could apply in an ETB context, unless the statement could be reworded to include ownership at provider level.
- The statement would seem to over-reach the power of a provider to own the on-line modules or sections that are outsourced to another certifying body such as City and Guilds or ITEC, for example, when a programme contains both QQI accreditation and accreditation of another body. Clarification is sought on this.

‘For example, there will need to be appropriate protocols for managing and archiving formal or informal learning conversations between learners or between learners and teaching staff’, p2, section 4.3.6.

- While it is acknowledged that online conversations will leave a trail, we question whether archiving of informal conversations is necessary, given that they would not be managed and archived in fully face-to-face centre-based learning.

## Section: Learner Experience Context

‘Learners will be enabled to pre-assess their own readiness to engage with online/blended learning programme’, p24.

- Online programmes are different from blended learning programmes.

Unique identifiers, p26.

- We would find it helpful to have further clarification or elaboration on what these could be, whether the phrase refers to email addresses or other types of electronic signatures or mechanisms.

‘Mechanisms which monitor and/or moderate standards (... in terms of ... teachers and assessors’ practice)’, p27, section 5.2.2.

- We have concerns that this statement relating to teacher practice could be an IR issue and it may need to be clarified with the relevant trade unions.

## **Conclusion**

Notwithstanding the clarifications being sought, we welcome the fact that the White Paper acknowledges that there are important differences between online learning, blended learning and face-to-face wholly centre-based learning.

It is comprehensive and covers the broad range of issues that arise when planning, developing, designing, delivering and assessing blended learning courses.

As DDLETB moves ahead with its TEL strategy, it is of the utmost importance to have clarity on when the level of technological enhancement nudges our provision/programmes into the ambit of these blended learning guidelines.