

SUBMISSION TO QQI CONSULTATION PROCESS

White Paper on Statutory Quality Assurance Guidelines for Flexible and Distributed Learning

ETBI welcomes the publication by QQI of topical QA guidelines for Flexible and Distributed Learning (FDL). The following are some observations on the draft document. This feedback has been collated by the Further Education Support Service (FESS) on behalf of ETBI.

Observations

ETBI commends QQI on a detailed and thorough document; it is timely and welcomed within the sector, in light of a number of activities in schools, FET and HET. This single set of guidelines span provision across the 10 Levels of the NFQ. ETBI considers that this is a challenge, as the needs of the learner are very different at each level. For example issues of literacy and numeracy will be key for learners at levels to 1-3 in terms of the reading level and design of materials, something that will not may not be as critical an issue at the higher levels of learning in framework.

Overall there would seem to be too much focus on *asynchronous learning* and on learners 'interacting' with pre-created content. This is understandable, but there is a danger that courses will be too content heavy and too much QA focus will be on the content (e.g. the analogy of the textbook being the focus rather than the interaction between learners and providers). Experience within this field would suggest, *more synchronous* type interaction around content, ideas and discussion are equally valid and these are not prominent in the document. There is a danger that the FDL model could become too content focused and in turn support didactic forms of learning.

There is very limited guidance in the document around the *role of synchronous or live learning using FDL*. It is too focused on asynchronous and there is clear evidence that synchronous will play a greater role going forward. Here providers will need tutors who are skilled and competent in designing and running such learning sessions.

There is a lot of reference to *learner-centred* and the potential of FDL to be learner-centred. It is not clear however what this will look like or how providers should interpret this notion online. Does QQI envisage learners enrolling in *personalised* programmes or is it something different? This needs to be elaborated on further.

The notion of providers designing learning activities that meet the needs of their learners, while taking maximum advantages of the technology, at their disposal appears to be missing. The technology allows but also curtails what is possible to design and implement for learners, so providers will need to design learning activities that suit the technologies that are available. The notion of *learning and assessment design* needs to be very strong and not just in content creation. Both need to be considered.

Professional development is key for the entire education and training sector; QQI, Providers, Teachers/trainers/tutors/lecturers and learners. The challenge is, how do we design online programmes that can facilitate learning? This will take time and ongoing investment. How can opportunities for professional practice be facilitated to enable this area to develop and for providers and learners to share their experiences? Do teachers need to have participated in an online course themselves to effectively support the delivery of the programmes?

The challenge nationally is, there is limited capacity and capability in this space; how can it be developed over time, what can QQI do to enhance and facilitate development in FDL. The development of these highly relevant topical QA Guidelines are a welcome start in this regard.

5 February 2016