

QQI White Paper
*'Statutory Quality Assurance
Guidelines for Flexible and
Distributed Learning'*

SOLAS Feedback

February 2016

1 Introduction

In December 2015 QQI published White Paper 'Statutory Quality Assurance Guidelines for Flexible and Distributed Learning' for stakeholder consultation. This White paper has been reviewed by the SOLAS eCollege Unit and the resulting feedback, comment and observations are contained in the pages that follow, and are presented in blue text for ease of identification. SOLAS feedback will link, where possible, to the relevant areas and headings of the original White Paper.

2 General Feedback on Terminology, Structure and Fitness for Purpose

Feedback and suggestions would be especially welcome on the following areas:

1 Terminology.

For example, the adoption of 'Flexible and Distributed Learning' as the umbrella term in the document.

There is an issue with language when it comes to the introduction of flexibility in the delivery of Education and Training, often enabled through the embedding of digital technologies. There are a range of terms used in policy documents, strategies and academic research ('e-learning', 'digital technologies', 'new technologies', 'new media', 'learning technologies', 'ICT' and 'Technology Enhanced Learning'; to name but a few). The reality is that no single term has gained a common understanding and level of currency so that a major contribution of this document is to not only decide on the term but to clearly define it for the sector, in Ireland. In this context FDL seems restricted in referring to technology used in distributed learning but fails to include the application of technology to traditional face to face classroom type learning or assessments. In this context the FDL term introduces the risk of excluding for example technology enhanced learning supports and assessments (inc. e-Portfolios) in traditional classroom settings. The term Technology Enhanced Learning (TEL) is increasingly used and is being adopted by SOLAS in the development of a strategy for the FET sector. SOLAS have defined TEL: *"Where technology is used to enable new types of learning practices and to enhance existing learning settings."*

The adoption of FDL (or Technology Enhanced Learning) is becoming so ubiquitous that there is an argument for including these guidelines, where necessary, as an expansion of the core Quality Assurance guidelines.

- 2 The structure of the document into sections focussing on organisational, programme and learner experience context.

These headings are appropriate and facilitate the structuring of the specific guidelines, however a section on Assessment might also be appropriate.

- 3 Fitness for purpose and user-friendliness.

Overall the document risks the duplication, confusion or version control issues resulting from repeating guidelines already covered in the Core Statutory Quality Assurance Guidelines, despite stated efforts avoid such risks. It could be argued that guidelines within this document are already capable of being interpreted within the context of the core Guidelines, in particular, programme development and approval, staff development and assessment of learning achievement, once accepted that they take account of the methodology used in the stated course delivery. At the same time the guidelines do not cover flexible learner centred approaches that becomes increasingly viable under FDL, such as continuous intake and access to assessments, individual learning paths and the implication for prescribing course durations.

Specific Feedback

1.1 Legal and Policy Context

These statutory topic specific guidelines need to be read in conjunction with the Core Statutory Quality Assurance Guidelines. While the Core QA guidelines provide the majority of the quality assurance guidance required, these topic specific guidelines add to the core by addressing the more specific requirements for Flexible Distributed Learning (FDL).

The document will form a part of QQI's suite of **topic specific** statutory QA guidelines as set out in the QQI *Policy on Quality Assurance Guidelines, December 2014 (updated December 2015)*. As per that policy (Section 4.2), QA guidelines can be expected to have different and often discrete purposes in each part of the education and training sector and in the themes they address.

SOLAS input: The new learning methodologies that become a viable reality in the context of FDL are not facilitated through these guidelines. For example assessment on demand, flexible durations based on individual learning paths, competency based learning and assessment

approaches where awards are based on evidence of the attainment of identified competencies, rather than time spent on courses, etc. are ignored, so that the guidelines contained in core Quality Assurance Guidelines will apply, resulting in unnecessary restrictions on a learner centred approach to programme design that are facilitated through FDL.

3 Guideline

3.1.1 The provider's approved and published strategy, and its policies to support the strategy, take appropriate account of its existing or planned FDL provision.

This is a critical guideline and addresses the need to ensure that existing quality assurance procedures are implemented in the context of FDL. For example that in designing a programme for FDL delivery, that the Teacher/Trainer Profile, Learner Profile, Induction Module and learning outcomes and assessments are constructed so as to facilitate the intended approach (Blended, Online, continuous intake, etc.)

The remaining Guidelines places too much emphasis on Learning Content and Resources while ignoring the synchronous tools increasingly used in FDL provision (such as virtual classroom sessions and video conferencing tools)

The implication of Badges, that are gaining credibility as an informal method of recognition as a certification methodology is not mentioned in the current draft document and should also be addressed. This may have a major implication for Recognition of Prior Learning.